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Transcript of Jury Trial - Day 9

Date: April 25, 2022
Case: Depp, II -v- Heard

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Transcript of Jury Trial - Day 9
Conducted on April 25, 2022

1 (2187 to 2190)

2187	2189
<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 Monday, April 25, 2022 16 10:24 a.m. EDT 17 TRIAL DAY 9 18 19 20 Job No.: 443890 21 Pages: 2187 - 2504 22 Reported by: Judith E. Bellinger, RPR, CRR</p>	<p>1 A P P E A R A N C E S 2 3 ON BEHALF OF THE PLAINTIFF AND COUNTERCLAIM 4 DEFENDANT: 5 BENJAMIN G. CHEW, ESQUIRE 6 BROWN RUDNICK LLP 7 601 Thirteenth Street NW 8 Suite 600 9 Washington, D.C. 20005 10 202.536.1700 11 12 SAMUEL A. MONIZ, ESQUIRE 13 CAMILLE M. VASQUEZ, ESQUIRE 14 BROWN RUDNICK LLP 15 2211 Michelson Drive 16 7th Floor 17 Irvine, CA 92712 18 949.440.0234 19 20 21 22</p>
2188	2190
<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 LECAROS, 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 9
 Conducted on April 25, 2022

2 (2191 to 2194)

2191		2193		
<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>1 EXHIBITS</p> <p>2 Offered Admitted</p> <p>3 Plaintiff's</p> <p>4 1 2281 2281</p> <p>5 120C 2304 2305</p> <p>6 357A 2373 2373</p> <p>7 365 2339 2339</p> <p>8 366 2211 2211</p> <p>9 396B 2212 2212</p> <p>10 582 2201 2201</p> <p>11 598C 2361 2361</p> <p>12 804 2290 2292</p> <p>13</p> <p>14 Defendant's</p> <p>15 120B 2250 2251 (with redactions)</p> <p>16 195 2231 2232 (with redactions)</p> <p>17 207 2241 2241 (with redactions)</p> <p>18 272 2252 2253 (with redactions)</p> <p>19 376C 2467 2467</p> <p>20 376G 2467 2468</p> <p>21 394 2235 2235 (with redactions)</p> <p>22 470 2245 2246 (with redactions)</p>		
2192		2194		
<p>1 CONTENTS</p> <p>2 EXAMINATION OF JOHN C. DEPP, II (CONTINUING) PAGE</p> <p>3 By Mr. Rottenborn 2200</p> <p>4 By Ms. Meyers 2280</p> <p>5 EXAMINATION OF BEN KING PAGE</p> <p>6 By Mr. Moniz 2380</p> <p>7 By Mr. Nadelhaft 2434</p> <p>8 By Mr. Moniz 2489</p> <p>9</p> <p>10</p> <p>11</p> <p>12</p> <p>13</p> <p>14</p> <p>15</p> <p>16</p> <p>17</p> <p>18</p> <p>19</p> <p>20</p> <p>21</p> <p>22</p>		<p>1 EXHIBITS CONTINUED</p> <p>2</p> <p>3 581 2203 2203</p> <p>4 586B 2210 2210</p> <p>5 587B 2247 2247</p> <p>6 598B 2206 2206</p> <p>7 620 2227 2228</p> <p>8</p> <p>9</p> <p>10</p> <p>11</p> <p>12</p> <p>13</p> <p>14</p> <p>15</p> <p>16</p> <p>17</p> <p>18</p> <p>19</p> <p>20</p> <p>21</p> <p>22</p>		

<p style="text-align: right;">2195</p> <p style="text-align: center;">P R O C E E D I N G S</p> <p>1</p> <p>2</p> <p>3 THE BAILIFF: All rise. Please be</p> <p>4 seated and come to order.</p> <p>5 THE COURT: Good morning. Everything</p> <p>6 good now, Judy?</p> <p>7 COURT REPORTER: Yes, ma'am.</p> <p>8 THE COURT: All right. Do we have any</p> <p>9 preliminary matters before the jury?</p> <p>10 MR. ROTTENBORN: Just a few preliminary</p> <p>11 matters, Your Honor.</p> <p>12 THE COURT: Okay.</p> <p>13 MR. ROTTENBORN: One, we have redacted</p> <p>14 exhibits for the Court from last week. We've</p> <p>15 given them to Ms. Meyers this morning, and they've</p> <p>16 confirmed they look okay to them.</p> <p>17 THE COURT: Okay.</p> <p>18 MR. ROTTENBORN: So here are paper</p> <p>19 copies, and the thumb drive contains electronic</p> <p>20 copies of these as well as the excerpted audio</p> <p>21 recordings that were played.</p> <p>22 THE COURT: Okay. Well, I kind of need</p>	<p style="text-align: right;">2197</p> <p>1 THE COURT: Just so we can have them</p> <p>2 numbered that way, correct?</p> <p>3 MR. ROTTENBORN: Sure.</p> <p>4 THE COURT: All right. I think you'd</p> <p>5 keep me happy. Yes.</p> <p>6 MR. ROTTENBORN: No problem. I just</p> <p>7 have one more issue I would like to approach</p> <p>8 about.</p> <p>9 THE COURT: Okay. Sure.</p> <p>10 (Sidebar.)</p> <p>11 THE COURT: Yes, sir.</p> <p>12 MR. ROTTENBORN: Good morning. We</p> <p>13 believe that Mr. Depp's testimony opened the door</p> <p>14 for the U.K. judgment. He testified that --</p> <p>15 THE COURT: On direct?</p> <p>16 MR. ROTTENBORN: On direct, he</p> <p>17 testified that six years ago that Ms. Heard made</p> <p>18 these allegations against him. And then he went</p> <p>19 on to say that he had to wait for his opportunity</p> <p>20 to address the charges, and he said, "So I felt a</p> <p>21 responsibility of clearing the record the only way</p> <p>22 that I could get to the point where I could speak.</p>
<p style="text-align: right;">2196</p> <p>1 a thumb drive for each audio recording.</p> <p>2 MR. ROTTENBORN: Oh, a separate thumb</p> <p>3 drive for each?</p> <p>4 THE COURT: It's marked as different</p> <p>5 exhibits, so I have to have different exhibits.</p> <p>6 MR. ROTTENBORN: We can have that for</p> <p>7 you by tomorrow.</p> <p>8 THE COURT: Good. We'll go through</p> <p>9 what we have. And you have yours as well?</p> <p>10 MS. MEYERS: Yes, Your Honor. If I may</p> <p>11 approach, I have --</p> <p>12 THE COURT: Okay.</p> <p>13 MS. MEYERS: -- this is Plaintiff's</p> <p>14 Exhibit 40 redacted and the photographs that were</p> <p>15 Plaintiff's exhibits --</p> <p>16 THE COURT: Okay. Perfect. All right.</p> <p>17 Great. We'll go through those, and if we need</p> <p>18 anything else we'll let you know, okay?</p> <p>19 MR. ROTTENBORN: Each of the excerpted</p> <p>20 recordings are on a separate audio file on the</p> <p>21 thumb drive. I understand you're saying you'd</p> <p>22 like a separate physical.</p>	<p style="text-align: right;">2198</p> <p>1 It really has taken this whole six years."</p> <p>2 THE COURT: Okay.</p> <p>3 MR. ROTTENBORN: And then later he</p> <p>4 says, on the next page he says, "This is actually</p> <p>5 the first opportunity that I've been able to speak</p> <p>6 about this case in full for the first time." So</p> <p>7 he's careful there to say "this case."</p> <p>8 THE COURT: This case?</p> <p>9 MR. ROTTENBORN: So what he's left the</p> <p>10 jury with is the impression that he talks about</p> <p>11 these accusations six years ago. He's leaving the</p> <p>12 jury with the impression that he's never had the</p> <p>13 opportunity to address the truth of those</p> <p>14 accusations, when the fact is -- the jury's left</p> <p>15 with the impression he's never been able to</p> <p>16 address them to this point.</p> <p>17 THE COURT: All right.</p> <p>18 MR. CHEW: I think he was very careful</p> <p>19 to avoid that, Your Honor. I think he's grasping</p> <p>20 at straws.</p> <p>21 MS. MEYERS: I believe this is an issue</p> <p>22 for damages.</p>

2199	1 THE COURT: I don't think the door's 2 been opened at this point. 3 MR. ROTTENBORN: Do I have your leave 4 to refer to the article, ask about that article? 5 THE COURT: Which article? 6 MR. ROTTENBORN: The article that was 7 the subject of the lawsuit, the op-ed -- not the 8 op-ed. 9 MS. BREDEHOFT: Has nothing to do with 10 this case. 11 THE COURT: I don't know which article 12 you're talking about. 13 MR. ROTTENBORN: We'll just take it as 14 it comes, Your Honor. 15 MR. CHEW: The Sun article he's 16 referring to, which has nothing to do with this 17 case. 18 THE COURT: I'm not going to allow 19 that. 20 MR. ROTTENBORN: I just want to be very 21 clear. 22 THE COURT: Perfect. I appreciate it.	2201	1 A Yes, indeed. 2 Q Emotional? 3 A Indeed. 4 Q Verbal? 5 A Indeed. 6 Q Psychological abuse? 7 A Indeed. Some of those sort of flow 8 into the others. 9 Q I would like to talk -- understood. 10 I would like to talk about some of that 11 abuse. 12 MR. ROTTENBORN: Can we pull up 13 Exhibit 582, please. Your Honor, this is a 14 recording, Defendant's Exhibit 582, that we will 15 play the entirety of. 16 THE COURT: All right. Any objection 17 to 582? 18 MS. MEYERS: No objection, Your Honor. 19 THE COURT: All right. 582 in 20 evidence. 21 (Whereupon, the following audio was 22 played.)
2200	1 (Open court.) 2 THE COURT: Ready for the jury? 3 MR. ROTTENBORN: Yes, Your Honor. 4 (Whereupon, the jury entered the 5 courtroom and the following proceedings took 6 place.) 7 THE COURT: All right. Thank you. Be 8 seated. All right. Just a reminder, Mr. Depp, 9 you're still under oath, okay, sir? 10 THE WITNESS: Yes, ma'am. 11 THE COURT: Cross-examination. 12 MR. ROTTENBORN: Thank you, Your Honor. 13 THE COURT: All right. 14 MR. ROTTENBORN: Good morning, 15 everyone. I hope you had a nice weekend. 16 EXAMINATION BY COUNSEL FOR THE DEFENDANT AND 17 COUNTERCLAIM PLAINTIFF (CONTINUING) 18 BY MR. ROTTENBORN: 19 Q Mr. Depp, we talked about this a little 20 bit, but you've testified that abuse can come in 21 many forms, correct, physical being one of them, 22 right?	2202	1 MS. HEARD: Go put your fucking 2 cigarettes out on someone else. You fucking have 3 consequences for your actions. That's it. 4 MR. DEPP: Shut up, fat ass. 5 MS. HEARD: Yeah, you got me there. 6 MR. ROTTENBORN: Can you play that one 7 more time, please, Michelle? 8 MS. MEYERS: Objection, Your Honor. 9 THE COURT: I'll sustain the objection. 10 Move on. 11 BY MR. ROTTENBORN: 12 Q Mr. Depp, when Ms. Heard tells you in 13 that recording to go put your cigarette out on 14 someone else, you don't deny that, but instead you 15 simply say, "Shut up, fat ass"; is that correct? 16 A I think that was another grossly 17 exaggerated moment of Ms. Heard's. I did not put 18 a cigarette out on her or throw a cigarette at 19 her. 20 MR. ROTTENBORN: Let's pull up 21 Exhibit 581, please. This is another recording 22 that we'll play the entirety of with Your Honor's

<p>2203</p> <p>1 leave. 2 THE COURT: Any objection to 581? 3 MS. MEYERS: No objection. 4 THE COURT: 581. 5 (Whereupon, the following recording was 6 played.) 7 MS. HEARD: Go, "I fucked up," and cry 8 in my bedroom after I had dumped you a fucking 9 week prior, a fucking week prior, after you beat 10 the shit out of me, and then a week later, you 11 show in my -- show up at my doorstep in my room 12 saying you want to say goodbye. Okay. Say 13 goodbye. 14 MR. DEPP: Oh, I said it? 15 MS. HEARD: Yes, you did say it. I'll 16 go to the text messages so that we're clear on the 17 tape. 18 MR. DEPP: Yes. Because you had said 19 and forward it to me. 20 MS. HEARD: Okay. No doubt. But you 21 did not say you're going to come over, say 22 goodbye?</p>	<p>2205</p> <p>1 extent Your Honor's agreeable, we may be agreeable 2 to just entering the whole thing as evidence. But 3 for now since there's a very small portion at the 4 end that we're not going to play of a third party, 5 we'll just -- I'll just give you the excerpts, if 6 that works. 7 THE COURT: Well, then I need 598B, and 8 I need to know what the time of excerpts are. 9 MR. ROTTENBORN: Yes. We'll prepare 10 that for you, Your Honor. 11 THE COURT: Well, I need it now. I 12 mean... 13 MR. ROTTENBORN: I have the excerpts. 14 THE COURT: Okay. 15 MR. ROTTENBORN: So this will be 598B, 16 and it's seconds 1 through 20, and then it's 17 minutes 30 minutes and 2 seconds through 31 18 minutes and 45 seconds. 19 THE COURT: Okay. All right. Any 20 objection to 598B then? 21 MS. MEYERS: No objection, Your Honor. 22 THE COURT: Thank you.</p>
<p>2204</p> <p>1 MR. DEPP: I made a huge mistake, a 2 huge mistake. 3 MS. HEARD: You didn't say that to me? 4 MR. DEPP: Well, I won't do it again. 5 MS. HEARD: Did you or did you not say 6 you were coming over to say bye? 7 MR. ROTTENBORN: Can we please pull up 8 Exhibit 598? 9 THE COURT: Is this is another audio? 10 MR. ROTTENBORN: It is, Your Honor, and 11 I will give the excerpts that we proposed to play, 12 and I'll say, Your Honor, this is a -- it's a 13 lengthy recording where -- 14 THE COURT: Well, I already have 598A 15 in evidence. 16 MR. ROTTENBORN: Right. And I just 17 wanted to clarify. Spoke with Ms. Meyers this 18 morning. We're going to speak at a break. It's 19 a -- we're trying to be very careful about whether 20 there's a third party on the tape. This is one 21 where at the very end, someone else comes in. But 22 Ms. Meyers and I will speak and we may be, to the</p>	<p>2206</p> <p>1 (Whereupon, the following recording was 2 played.) 3 MS. HEARD: What is it? 4 MR. DEPP: You're not being able to 5 do... 6 MS. HEARD: Nope. I meant exactly what 7 I said. 8 MR. DEPP: What did you say? 9 MS. HEARD: At least I'm not doing it 10 behind your back. I'm telling you. You gave me 11 shit that I was recording, and I said "Yeah. I'm 12 recording, but at least I'm telling you." 13 MR. DEPP: Okay. 14 MS. HEARD: And if you had asked me not 15 to, I wouldn't. 16 MR. DEPP: Well, record. 17 MR. ROTTENBORN: Okay. So the next 18 excerpt is minute 30 minutes and 2 seconds. 19 (Whereupon, the following recording was 20 played.) 21 MR. DEPP: Walking away -- and I will 22 fucking stick to this until I die: Walking away</p>

<p style="text-align: right;">2207</p> <p>1 is necessary, is necessary especially between you 2 and I. It is of utmost importance because the 3 next move if I don't walk away or just go out for 4 a little while, it's just going to be -- it's just 5 going to be a bloodbath like it, you know, like it 6 was on the island, of course, like it was, you 7 know -- it's just not worth it, no. It's just not 8 worth it. 9 MS. HEARD: Yeah. 10 MR. DEPP: I'm miserable. Can we 11 just -- 12 MS. HEARD: The options are there. 13 MR. DEPP: -- have some semblance of 14 understanding of each other? 15 MS. HEARD: Please. Please, can we? 16 Because I'm not trying to say -- hey, by the way, 17 no one in their right mind is going to choose the 18 bloodbath over walking away, obviously, if you're 19 given the option between the two. 20 MR. DEPP: Then why has it been chosen 21 so many times? 22 MS. HEARD: It's that snowball. It is</p>	<p style="text-align: right;">2209</p> <p>1 Mr. Depp, isn't the first time that you refer to 2 an argument as a bloodbath. In fact, in this text 3 exchange that we saw on Friday, when you informed 4 Ms. Heard that there exists a book entitled "Disco 5 Bloodbath," and she asked you if it is "about last 6 Friday night by any chance," you say, "How can you 7 make me smile about such a hideous moment? Yes, 8 it is. Funny bitch." 9 Did I read that right? 10 A Certainly did, sir. Thank you. 11 MR. ROTTENBORN: Can we pull up 12 Exhibit 586, please? 13 Your Honor, the only portion of this 14 exhibit that we plan to play to recording is 15 minute 7:35 to 8:20. 16 THE COURT: Okay. But I already have a 17 586A. 18 MR. ROTTENBORN: So this will be 586B, 19 if.. 20 THE COURT: 7:35 to what? 21 MR. ROTTENBORN: 8:20. 22 THE COURT: Thank you. No objection to</p>
<p style="text-align: right;">2208</p> <p>1 not a distinct choice that either one of us make 2 at any discernible point. 3 MR. DEPP: No. It's stubbornness, and 4 it's all kind of shit. 5 MS. HEARD: It builds, right? Like you 6 build, I build. It isn't like at one moment 7 either of us sign a certificate saying, or like 8 sign a contract, or say, "Okay, now. Bloodbath." 9 No. So acting as though there's a choice between 10 the two is irrelevant. I'm not asking you to stay 11 over having a bloodbath. I'm asking you -- I 12 mean, over walking away. I'm not asking you to 13 have a bloodbath over walking away. I'm asking 14 you to work it out over prolonging it to making it 15 bigger. 16 MR. ROTTENBORN: Can you please pull up 17 Defendant's Exhibit 161, which was admitted into 18 evidence on Thursday, Your Honor, I believe. 19 THE COURT: Okay. Yes, it was. 20 MR. ROTTENBORN: Thank you. 21 BY MR. ROTTENBORN: 22 Q Now, that recording that we just heard,</p>	<p style="text-align: right;">2210</p> <p>1 586B? 2 MS. MEYERS: No objection, Your Honor. 3 THE COURT: 586B. 4 (Whereupon, the following recording was 5 played.) 6 MS. HEARD: Yes, you do. Because you 7 wouldn't have used that as a way to hit me. I was 8 pouring my heart out to you. What do you do? 9 We get it. We get a stab in here. That's what 10 you saw, huh? You listened to me cry, you know. 11 Is that what you think? Or you just do it without 12 thinking? You do it without thinking, huh? You 13 don't get (indiscernible due to background noise) 14 a stab in when you can. You throw a swing when 15 you can. And what -- when better than to wait 16 when I'm on the floor? Because that's when it's 17 really good to hit someone. 18 MR. ROTTENBORN: Can you please pull up 19 Plaintiff's Exhibit 366. This is another 20 recording, Your Honor, that we would propose to 21 admit all of although we will only be playing 22 minute 3:20 through 3:38.</p>

2211	1 THE COURT: All right. So no objection 2 to 366 in its entirety; is that correct? 3 MS. MEYERS: That's correct, Your 4 Honor. 5 THE COURT: All right. 366 in 6 evidence. Oh, Plaintiff's, I'm sorry. 7 (Whereupon, the following recording was 8 played.) 9 MS. HEARD: Talk louder. Every other 10 man I know, every other relationship I know, other 11 man is like, "Oh, yeah. Shit," and you go louder. 12 Every single time you get -- 13 MR. DEPP: Because you're a fucking 14 cunt. 15 MR. ROTTENBORN: Can you please pull up 16 Plaintiff's Exhibit 396. Your Honor, portions of 17 this were used on Thursday, so with your leave, 18 we'd like to introduce this as 396B with the 19 following excerpts: 2:44 and 0 seconds through 20 2:44 and 16 seconds, and then 2:49 and 30 seconds 21 through 2:49 and 55 seconds. 22 THE COURT: All right. Any objection	2213	1 shut up with that. 2 MS. HEARD: You shut up. Whenever 3 you -- 4 MR. DEPP: That's right. 5 MS. HEARD: Stop. Get off me. 6 MR. DEPP: Impossible. I'll talk to 7 you later. 8 MS. HEARD: No. Wait, wait. 9 MR. DEPP: I'll talk to you later. 10 MS. HEARD: No. 11 MR. DEPP: I'll talk to you later. 12 BY MR. ROTTENBORN: 13 Q You heard Ms. Heard say, "Get off me," 14 right? 15 A No, I did not. There's just screaming, 16 and then I heard, "I'll talk to you later. I'll 17 talk to you later." 18 MR. ROTTENBORN: Look at Exhibit 857, 19 please. 20 THE COURT: That's Defendant's 857? 21 MR. ROTTENBORN: Yes, Your Honor. 22 THE COURT: Okay. This is another
2212	1 to 396B? 2 MS. MEYERS: No objection, Your Honor. 3 THE COURT: 396B. 4 (Whereupon, the following recording was 5 played.) 6 MR. DEPP: Please what? This is my 7 fucking last day. 8 MS. HEARD: (Indiscernible.) 9 MR. DEPP: If you ask me, this is your 10 last call for (indiscernible). 11 MS. HEARD: (Indiscernible) selfishly 12 I'm trying to help us. 13 MR. DEPP: This is not helping, you 14 stupid fuck. This is not helping. 15 MR. ROTTENBORN: If you could, please 16 go to 2:49 and 30 seconds, please. 17 (Whereupon, the following recording was 18 played.) 19 MR. DEPP: I don't want to figure it 20 out. 21 MS. HEARD: (Indiscernible.) 22 MR. DEPP: I don't fucking care. You	2214	1 audio? 2 MR. ROTTENBORN: It's not, no. 3 THE COURT: Okay. Is there any... 4 Q Mr. Depp, I'd like to direct your 5 attention to the second-to-last text on this. 6 A Yes. 7 Q This is a text from you to your agent, 8 Christian Carino, on August 15th, 2016, correct? 9 A That's correct. That's what it looks 10 like, yes. 11 MS. MEYERS: Objection, Your Honor. 12 Relevance and prejudice. 13 THE COURT: If you could, approach for 14 a moment. Could you make it a little bigger for 15 me? Thank you. 16 (Sidebar.) 17 MS. MEYERS: Your Honor -- 18 THE COURT: 2016. 19 MS. MEYERS: This is, again, after the 20 separation. They've already put in exhibits that 21 they're using foul language after this point, and 22 this is needlessly cumulative, and it's

2215	1 irrelevant. 2 THE COURT: What's the relevance? 3 MR. ROTTENBORN: Well, it's just the 4 second-to-last text. It's not cumulative for a 5 couple reasons, Your Honor. Number one, Your 6 Honor allowed us to put in texts of violence that 7 he wants to have happen to Ms. Heard. You already 8 allowed the texts of Isaac Baruch, which was 9 after -- those were after May 21st, 2016. 10 THE COURT: Oh, I understand that. But 11 I don't see -- 12 MR. ROTTENBORN: He -- this is the same 13 thing. This is him saying -- the one at the 14 bottom, "I hope that karma kicks in and takes the 15 gift of breath from her. She's going to" -- 16 second one up from the bottom, he refers to her -- 17 and this is a document Your Honor's admitted into 18 evidence that his violence toward Amber Heard, 19 toward Alan Barkley (phonetic) on Friday in the 20 deposition designations, and this is him talking. 21 THE COURT: This kind of makes it sound 22 like it's cumulative.	2217	1 think it's 2014, "She will hit the wall hard." 2 This is language of violence. 3 THE COURT: There's a couple -- but 4 it's engrossed in a lot of irrelevant information. 5 It doesn't belong in here. So if you want to pick 6 out those two, looks like "I'm so funny now she 7 wants to act this out. She'll hit the wall," I'll 8 allow that. 9 And then I think the one that 10 complicates (indiscernible) that's about it. 11 MR. ROTTENBORN: Okay. Well, I'd like 12 to get it in to ask him about those. 13 THE COURT: If you could redact it to 14 just those two. 15 MR. ROTTENBORN: Okay. Thank you, Your 16 Honor. 17 THE COURT: We need to make progress 18 here soon. 19 MR. ROTTENBORN: Okay. 20 (Open court.) 21 MR. ROTTENBORN: Your Honor, for the 22 sake of time, I'll go ahead, and may I ask the
2216	1 MR. ROTTENBORN: This is critically 2 important that the jury see. This is what he's 3 saying about Amber. 4 THE COURT: I mean, I can understand 5 some of it, not all of it, obviously. Is not 6 relevant. 7 MR. ROTTENBORN: That one -- 8 THE COURT: One line? 9 MR. ROTTENBORN: When he says, "global 10 humiliation." 11 THE COURT: That's -- 12 MR. ROTTENBORN: He says something like 13 he hopes that "Karma gets the best of her; she 14 will hit the wall hard," I can point to another 15 exhibit right after this, Your Honor, 2014, he 16 uses "hit the wall hard," he uses that same 17 phrase. That's another reason I want to use that 18 exhibit. 19 THE COURT: Doesn't say that in this 20 particular text. Oh, here it goes. 21 MR. ROTTENBORN: And then the next 22 exhibit that I introduce, one where he says I	2218	1 witness about the portions that we discussed and 2 then -- 3 THE COURT: Yeah, that's fine. 4 MR. ROTTENBORN: -- we can provide a 5 redacted version? 6 THE COURT: Okay. 7 BY MR. ROTTENBORN: 8 Q Mr. Depp, in this text message from you 9 to Christian Carino, your agent, on August 15th, 10 2016, you tell him, you go on at some length about 11 Amber, but you say "She will hit the wall 12 hard!!!!" and then later down you say, "I can only 13 hope that Karma kicks in and takes the gift of 14 breath from her." 15 Did I read that right? 16 MR. ROTTENBORN: Objection. Compound. 17 THE COURT: I'll allow it. Go on. 18 A You read that correctly, sir. 19 Q And this wasn't the first time that you 20 talked about Amber hitting the wall hard. 21 MR. ROTTENBORN: Let's pull up 22 Exhibit 213, please.

2219	<p>1 A Hitting the wall hard based on the 2 accusations that she'd pulled out -- 3 Q Let's take a look at -- 4 A I'm sorry. I was talking. Is that all 5 right? 6 Q You had answered my question. We'll 7 take a look at the next exhibit. 8 A Oh, I understand. Long as you're 9 happy, sir. 10 Q Mr. Depp, this is a text that you sent 11 to Bruce Witkin on February 4th, 2014, right at 12 the top of the page. 13 A Where am I looking, sir? 14 Q On your screen, please. 15 A I figured that out. 16 Q The top text on the screen. 17 A Okay. I didn't know if there was a 18 specific -- if it was third from the bottom or 19 somewhere around the corner. 20 What would you like me to do? 21 Q This is a text that you sent to Bruce 22 Witkin on February 4th, 2014, correct?</p>	2221	<p>1 just read, correct? 2 A They are similar words, but they have 3 different meanings if -- I don't know if it makes 4 sense to you. 5 MR. ROTTENBORN: Can we pull up 6 Exhibit 498, please. 7 Q Mr. Depp, is this a text exchange that 8 you had with Ms. Heard on or about October 28th, 9 2015? 10 A Yes, sir. 11 Q And I'd like to direct your attention 12 to the third text down. 13 A Yes. 14 MR. ROTTENBORN: Your Honor, I'd move 15 for the admission of Defendant's Exhibit 498 with 16 identifiers redacted. 17 THE COURT: Any objection? 18 MS. MEYERS: Relevance, Your Honor. 19 THE COURT: All right, let's -- 20 MS. MEYERS: May we approach? 21 THE COURT: Okay. Sure. 22 (Sidebar.)</p>
2220	<p>1 A February 4th, 2014, yes. 2 MR. ROTTENBORN: Your Honor, move for 3 admission of this exhibit with just that text 4 displayed. 5 MS. MEYERS: With the redactions 6 applied and also the identifiers. 7 THE COURT: Okay. Redactions and 8 identifiers -- 9 MR. ROTTENBORN: We have that ready. 10 THE COURT: All right. 213 in evidence 11 with redactions. 12 MR. ROTTENBORN: Move for the admission 13 of this. Permission to publish, Your Honor? 14 THE COURT: It is in evidence. You can 15 publish it. 16 MR. ROTTENBORN: Thank you. 17 Q Mr. Depp, on February 4, 2014, you tell 18 Mr. Witkin "Amber and I hit the wall hard." 19 Do you see that? 20 A I do, sir. 21 Q And that's the same phrase that you 22 used in your text to Mr. Carino in this text we</p>	2222	<p>1 MS. MEYERS: Your Honor, the relevance 2 of Mr. Depp using an inappropriate word to 3 describe someone other than Ms. Heard, I don't 4 understand the relevance. 5 THE COURT: What's the relevance? 6 MR. ROTTENBORN: It's the violence 7 that's been -- I want to show that he said this -- 8 he's already opened the door and said he had such 9 a loving marriage and relationship with Vanessa, 10 so, at a minimum, it's impeachment. This is the 11 type of -- they're hoping that he's a classy guy 12 that never erupts. Amber's just brought out the 13 worst in him. This is showing that he had violent 14 thoughts toward others as well. He keeps saying 15 that he -- he testified repeatedly on direct about 16 his peaceful tendencies and how it was only on 17 Amber. This shows that that's -- I'm sorry to do 18 it, but there is a lot of horrible incidents of -- 19 THE COURT: It is cumulative. 20 MS. MEYERS: Your Honor, these are 21 words about someone that's not Ms. Heard. I don't 22 understand the relevance, and if anything, they're</p>

2223	1 offering it for improper character to suggest 2 that -- because he uses bad words. 3 THE COURT: I'm going to sustain the 4 objection at this time. 5 MS. MEYERS: Thank you. 6 THE COURT: All right. 7 (Open court.) 8 MR. ROTTENBORN: Can you pull up 9 Exhibit 330, please. 10 BY MR. ROTTENBORN: 11 Q Mr. Depp, I'd like to turn your 12 attention to the middle text on this page, which 13 is a text from you to someone named Ryan A on 14 January 12th, 2015. 15 Do you see that? 16 A January? Well, the second one from the 17 last? 18 Q Yes. 19 A The January 12th? 20 Q Yes. 21 A Yes, sir. 22 Q Is that Ryan Adams, the singer?	2225	1 MR. ROTTENBORN: I know. But that's -- 2 THE COURT: If there's not a specific 3 date tied to it. 4 MR. ROTTENBORN: It goes to his main -- 5 he's testified to his main beef with Amber was 6 that she didn't want him to be doing drugs, and he 7 hated her for it. 8 THE COURT: I think we get that over 9 the last day. 10 MR. ROTTENBORN: I'm going to have to 11 hit it a little bit more. I want to -- 12 THE COURT: If it's not tied to a 13 specific date. I to have to draw the line, we've 14 got too much cumulative things. I've gone through 15 all of the exhibits over the weekend, 16 Mr. Rottenborn, and there's plenty in here about 17 his substance abuse and his texts of substance 18 abuse. 19 Until you tie it down to a date -- 20 MR. ROTTENBORN: But it's not only 21 substance abuse, but, the violence that grows from 22 that.
2224	1 A Yes, it is. 2 MR. ROTTENBORN: Your Honor, move for 3 admission of Defendant's Exhibit 330, just plan on 4 asking him about that text. 5 MS. MEYERS: Objection. Relevance, 6 Your Honor. 7 MR. ROTTENBORN: Your Honor, I'm happy 8 to approach if you want. 9 THE COURT: Okay. 10 (Sidebar.) 11 MR. ROTTENBORN: It's directly toward 12 his state of mind on how Ms. Heard -- 13 THE COURT: Was it that date 14 specifically? Is there something that happens on 15 that date that's why we need to know about his 16 state of mind on that date? 17 MR. ROTTENBORN: I'm not sure he was 18 married. But he was with Ms. Heard that day. It 19 was getting toward the wedding, and this is a man 20 with -- 21 THE COURT: But we've had so many 22 substance abuse it's a cumulative nature --	2226	1 THE COURT: This one just says hatred. 2 MR. ROTTENBORN: Then the next one -- 3 we can discuss the next one. The next one he said 4 that -- I'm going to try to get in this one 5 from -- he texted her sober friend and said "The 6 head is a C word with a grievous intent. That's 7 why drugs are good." I mean, this ties into the 8 pain that he's testified that he experienced and 9 the fact that he numbs the pain with the drugs. 10 He just -- 11 THE COURT: I have a lot of exhibits 12 that say that, Mr. Rottenborn. So it becomes 13 cumulative. I'm going to sustain the objection at 14 this time. If words are tied to a date, it's 15 important in this case, okay? 16 MR. ROTTENBORN: We believe that the -- 17 okay. 18 THE COURT: All right? 19 MS. MEYERS: Thank you, Your Honor. 20 (Open court.) 21 MR. ROTTENBORN: Can you pull up 22 Exhibit 620, please.

2227	1 BY MR. ROTTENBORN: 2 Q Mr. Depp, I'd like to turn your 3 attention to text Number 40. 4 A Okay. 5 Q It's the third one down. 6 A Yes. 7 Q This is a text from you to Malcolm 8 Connolly; is that right? 9 A That's correct. 10 MR. ROTTENBORN: Your Honor, I'd move 11 for admission of this document with the third text 12 down. 13 MS. MEYERS: If I just -- 14 THE COURT: Sure. 15 MR. ROTTENBORN: And I'm happy to 16 approach to discuss if Your Honor would like. 17 MS. MEYERS: Relevance objection again. 18 THE COURT: Okay. Do you want to 19 approach? 20 (Sidebar.) 21 MR. ROTTENBORN: I believe that 22 February 10th -- you can correct me if you	2229	1 address the court. 2 That was the text message that I would 3 like to get in. I'm not sure what she's asking, 4 Your Honor. 5 THE COURT: We'll just go forward with 6 that text message for now, okay? 7 BY MR. ROTTENBORN: 8 Q Mr. Depp, do you remember last week the 9 jury saw the video of you, as you called it, 10 "assaulting the cupboards" in that kitchen on 11 Sweetzer Avenue? 12 A Yes, sir. Very well said. 13 Q And that was on or about February 10th, 14 2016, correct? 15 MS. MEYERS: Objection. Calls for 16 speculation. 17 THE COURT: I'll allow it if he can 18 answer. 19 A I don't know when that is from. I've 20 asked for the metadata, I've asked for the data 21 and received nothing. 22 Q Okay. This text you sent on
2228	1 disagree, but I believe February 10th, 2016, is 2 the date of that Sweetzer kitchen video that we 3 saw. 4 THE COURT: Right. 5 MS. MEYERS: I don't believe that that 6 date was ever established. I believe Mr. Depp 7 asked you about the date of that. 8 MR. ROTTENBORN: Well, you can 9 establish that with Amber. 10 THE COURT: I'll allow it at this time, 11 again, redacted. 12 MR. ROTTENBORN: Thank you. 13 (Open court.) 14 MS. MEYERS: Mr. Rottenborn, if that's 15 coming in, we would like the contextual text 16 messages as well if we might take a look, please. 17 MR. ROTTENBORN: I'm sorry? 18 MS. MEYERS: We would like to take a 19 look and just make sure the contextual text 20 messages are coming in with the one that you're 21 directing Mr. Depp to. 22 MR. ROTTENBORN: I'm just going to	2230	1 February 10th, 2016, to Malcolm Connolly? 2 A Yes. 3 Q Malcolm Connolly is one of your 4 security guards, correct? 5 A Yes, he is. 6 Q And in this text you say "Thanks, dear 7 Mal. I'm just at the point where I feel like I'm 8 going to puke all the time. Once I get this shit 9 moving and get meself out of her level of shit, I 10 will never mention this cunt's name again, ever 11 again. And the first prick that asks about her 12 gets a warning. Should the single-cell prick 13 decide to push it, he never forgets me and will 14 always be remembered throughout his life as the 15 guy that got his fucking nose bit off, chewed up, 16 and swallowed by Johnny Depp. While I do have 17 some civilized bones in my body, just on a matter 18 of principle, I must force him to watch me fulfill 19 this promise of mangling this motherfucker of 20 abuser. Love you, X." 21 Did I read that right? 22 A You did.

<p>2231</p> <p>1 Q I'd like to turn to your views on 2 Ms. Heard's career. 3 MR. ROTTENBORN: Can you please pull up 4 Exhibit 195. 5 Q I'd like to direct your attention to 6 the second-to-last text from the bottom. This is 7 a text message exchange between you and Ms. Heard 8 on October 29th, 2013, correct? 9 A It looks like it is, yes. 10 MR. ROTTENBORN: Your Honor, I move for 11 the admission of Defendant's Exhibit 195 with the 12 appropriate identifiers redacted. 13 MS. MEYERS: We would object on 14 relevance grounds, Your Honor. 15 MR. ROTTENBORN: Your Honor, this is 16 him expressing his views on her taking a meeting 17 about a movie, her career. 18 THE COURT: Approach. Just come and 19 approach. 20 (Sidebar.) 21 THE COURT: How is that relevant? 22 MR. ROTTENBORN: He's jealous and he's</p>	<p>2233</p> <p>1 BY MR. ROTTENBORN: 2 Q Mr. Depp, you see the text from Amber 3 that says, "I'm at a coffee meeting now"? 4 Do you see that? 5 A I do, sir. 6 Q Right there. So she tells you at 7 12:41:00 p.m., "I'm at a coffee meeting now. Will 8 be home soon." 9 And then you respond, "Holy crap horse, 10 no goddamn meetings. No movies. Why? Why do you 11 deviate from our agreement? What species of 12 meeting? Fuck it. Just tell me when you get 13 home." 14 Did I read that right? 15 A You did. But coffee meeting. 16 Q You didn't want her to take the meeting 17 that she was taking that day, correct? 18 A It seems as though we had an agreement, 19 what seems like we had an agreement to do 20 something together. I'm actually asking what 21 species of meeting. So this is not necessarily an 22 angry text. It's just "Why do you deviate from</p>
<p>2232</p> <p>1 controlling and he told her, "No movies. No 2 meeting, no movies." This is what he says in that 3 text message to her. It goes entirely towards his 4 motive for abusing her. We're going to hear from 5 Ms. Heard about this. This is directly relevant. 6 MS. MEYERS: Your Honor, it's his view 7 on her. I mean, I don't have the context of this. 8 I don't understand how that -- 9 THE COURT: I guess it goes to his true 10 nature. I'll allow it. Did you have any 11 objection to the page coming in, or did you just 12 want the text? 13 MS. MEYERS: No, I would like the 14 entire page. 15 THE COURT: All right. Just get the 16 identifiers off. 17 MR. ROTTENBORN: Thank you. 18 THE COURT: Uh-huh. 19 (Open court.) 20 THE COURT: All right. So 195 will be 21 in evidence with redacted identifiers. 22</p>	<p>2234</p> <p>1 our agreement?" It's not about her doing films. 2 How do you think she got Aquaman, sir? 3 Q You tell her, "No goddamn meetings, no 4 movies," because you didn't want her acting; you 5 wanted to control her career, correct? 6 MS. MEYERS: Objection. Compound. 7 A That's patently untrue. And -- 8 THE COURT: I'll -- hold on, Mr. Depp. 9 Mr. Depp. 10 All right. Yes, I'll sustain the 11 objection. 12 Next question. 13 THE WITNESS: Sorry. 14 THE COURT: That's all right. 15 MR. ROTTENBORN: We can move on. 16 Exhibit 394, please, defendant's exhibit. 17 THE COURT: Thank you. 18 Q Mr. Depp, if you can take a look at the 19 fourth text down, this is a text from you to 20 Dr. Kipper on -- what's in the time stamp? I 21 believe it was sent on March 8th, 2015, Australia 22 time-stamped March 7th, 2015.</p>

2235	1 Do you see that? 2 A I do, sir. 3 MR. ROTTENBORN: Your Honor, move for 4 the admission of 394. 5 MS. MEYERS: No objection with the 6 proper redactions of the rest of the text messages 7 and identifiers. 8 THE COURT: Okay. 9 MR. ROTTENBORN: Thank you, Your Honor. 10 THE COURT: 394 in evidence with 11 redactions. 12 MR. ROTTENBORN: Permission to publish? 13 THE COURT: All right. Yes. Yes, sir. 14 Q Mr. Depp, on this date, right after you 15 had suffered an injury to your finger, you text 16 Dr. Kipper, and you say, "Hi. Fucked, man. Had 17 another one. I just cannot live like this. She 18 is as full of shit as a Christmas goose. I'm 19 done. No more. The constant insults, the 20 demeaning, belittling most heartbreaking spew that 21 is only released from a malicious, evil, and 22 vindictive cunt. But you know what? Far more	2237	1 MS. MEYERS: Objection. Compound. 2 THE COURT: All right. Sustain as 3 compound. 4 Q You're complaining about her ambition 5 in this text to her -- to Dr. Kipper, correct? 6 A I'm realizing that her ambition is far 7 stronger than her supposed feelings for me, yes. 8 Q And there's nothing about this text 9 that's trying to protect her? 10 A Protect her from what? 11 Q And you tell Dr. Kipper, "I cut the top 12 of my middle finger off," in this text, correct? 13 A It's just the way it was worded. It 14 doesn't mean that I actually literally cut my 15 finger off after, at the age of 12, finding the 16 only thing that gave me peace, which is playing 17 the guitar. Very unlikely. Why didn't I start 18 lopping off digits when I was 13, then? 19 Q Just the way it was worded. 20 Now, Ms. Heard -- 21 A Yeah. 22 Q Ms. Heard wasn't the only one that had
2236	1 hurtful than her venomous and degrading endless 2 educational ranting is her hideously and purposely 3 hurtful tirades and her goddamn shocking treatment 4 of the man she was meant to love above all. 5 Here's the real deal, mate. Her obsession with 6 herself is far more important. 7 "She is so fucking ambitious. She's so 8 desperate for success and fame, that's probably 9 why I was acquired, mate. Although she has 10 hammered me with what a sad old-man has-been I am, 11 Cowan has done me the most cruel of favors. 12 "I'm so very sad. I cut the top of my 13 middle finger off. What should I do except, of 14 course, go to a hospital? I'm so embarrassed for 15 jumping into anything with her. Fuck the world." 16 Did I read that right? 17 A Yes, Mr. Rottenborn. 18 Q So even as you are ranting about 19 Ms. Heard to Dr. Kipper, even as you are talking 20 about her ambition and expressing your objections 21 to that, you still admit to him that you cut the 22 top of your middle finger off, correct?	2238	1 a problem with you -- 2 MR. ROTTENBORN: You can take that 3 down. 4 Q Ms. Heard wasn't the only one that had 5 a problem with your drinking and abuse of alcohol, 6 correct? 7 MS. MEYERS: Objection. Compound. 8 THE COURT: All right. I'll sustain 9 the objection. 10 Q Ms. Heard wasn't the only one who had a 11 problem with your drinking, correct? 12 A Sir, if anyone had a problem with my 13 drinking at any time in my life, it was me. The 14 only person that I have ever abused in my life is 15 myself. 16 Q In fact, you tried to hide your 17 drinking from your daughter, Lily-Rose, didn't 18 you? 19 MS. MEYERS: Objection. Relevance. 20 THE COURT: What's the relevance? 21 A When you're nerves -- 22 THE COURT: Sir.

2239	2241
<p>1 MR. ROTTENBORN: Can we approach, Your 2 Honor? 3 THE WITNESS: Pardon. 4 THE COURT: Okay. 5 (Sidebar.) 6 MR. ROTTENBORN: Again, she's brought 7 his kids into it. He said that they hated 8 Ms. Heard. They didn't like her, blah, blah, 9 blah. And he's testified that no one had a 10 problem with his drinking. He said, "No one's had 11 a problem but me." And here -- the next text I'm 12 going to bring up is one where he says -- and this 13 is directly contrary to his testimony so far -- he 14 says, "Now Lily-Rose hates me because she thinks 15 I'm drinking, and she's right but I can't admit it 16 or I die in her eyes." 17 That's entirely relevant because it 18 undermines -- 19 THE COURT: What's the date? 20 MR. ROTTENBORN: January 21st, 2014, 21 directly in the middle of their relationship. 22 MS. MEYERS: That's not tied to any</p>	<p>1 A He was. 2 Q This is a text from you to Kevin Murphy 3 on January 21st, 2014, correct? 4 A Yes, sir. 5 MR. ROTTENBORN: Your Honor, I would 6 move for the admission of that portion of 7 Defendant's Exhibit 207 with redactions. 8 MS. MEYERS: With the identifiers 9 redacted, that's fine. Thank you. 10 THE COURT: All right. 207. 11 MR. ROTTENBORN: Permission to publish? 12 THE COURT: Yes, sir. 13 MR. ROTTENBORN: And in this text to 14 Kevin Murphy on February -- sorry, January 21st, 15 2014, you say, "Just trying to get over my 16 shocking discussion with Vanessa that lasted 17 five-plus hours." 18 Vanessa is your former parter, correct? 19 A She's the mother of my children, yes. 20 Q The mother of your children, that's 21 right. And then you say, "I feel ill and have 22 invested my guts into some side corner. Now</p>
2240	2242
<p>1 incidents of abuse. I don't believe he's denied 2 drinking during the relationship. 3 THE COURT: I'll allow that. We're 4 moving forward at some point. 5 MR. ROTTENBORN: I am. I'm trying to 6 go as fast as I can. I have a few more drug 7 things to do and then... 8 THE COURT: That sounds interesting. 9 MR. ROTTENBORN: I'm moving as fast as 10 I can. I think I'm less than 30 minutes away. 11 THE COURT: All right. I'll overrule 12 the objection. Move on. 13 MR. ROTTENBORN: Thank you, Your Honor. 14 (Open court.) 15 MR. ROTTENBORN: Thank you, Your Honor. 16 Can you pull up Exhibit 207, please. 17 Scroll down, please. Thank you. 18 BY MR. ROTTENBORN: 19 Q Mr. Depp, I'd like to direct your 20 attention to the last text on this page. It's a 21 text from you to Kevin Murphy. He was your estate 22 manager, correct?</p>	<p>1 Lily-Rose hates me because she thinks I'm 2 drinking, and she's right. But I can't admit or I 3 fucking die in her eyes. Thanks for that one, 4 Vanessa. Come to master in main house." 5 Did I read that correctly? 6 A You did, sir. 7 MR. ROTTENBORN: Can you pull up 8 Exhibit 1092, please. 9 Q Mr. Depp, is this a picture of you 10 passed out in a chair during daylight hours? 11 A Again, isn't passed out -- that's a 12 very specific term. "Sleep" could be one. Passed 13 out -- 14 Q Let's try it this way: This is a 15 picture of you in a chair, correct? 16 A That is correct. 17 MR. ROTTENBORN: Move for the admission 18 of 1092, Your Honor. 19 THE COURT: Any objection? 20 MS. MEYERS: Relevance, Your Honor. 21 MR. ROTTENBORN: Your Honor, I'm trying 22 to move this along. When we stop with</p>

2243	1 relevance -- 2 THE COURT: Do you want to lay a 3 foundation? 4 MR. ROTTENBORN: This is a picture of 5 Mr. Depp. We've introduced another on Thursday, 6 another -- 7 THE COURT: Do you want to approach? 8 THE WITNESS: What is the date of this 9 photograph? I'm sorry. 10 THE COURT: Thank you. 11 (Sidebar.) 12 MR. ROTTENBORN: Just three of these 13 I'm trying to -- 14 THE COURT: I know. But what's the 15 relevancy as far as what date? Do you have a 16 frame for this? 17 MR. ROTTENBORN: Ms. Heard can testify 18 to these. I don't know what the day is, but if he 19 says it's him, and again -- 20 THE COURT: It's him, but it's not 21 relevant unless I get a time frame. If you'll 22 wait until she gets on the stand and bring all	2245	1 an effort to move along, I'll skip through these, 2 and we'll bring them through Ms. Heard's 3 testimony. 4 THE COURT: Okay. That would be 5 perfect. 6 (Open court.) 7 MR. ROTTENBORN: Can you take that down 8 and put up Exhibit 470, Michelle, please. 9 BY MR. ROTTENBORN: 10 Q Mr. Depp, is this, is the bottom text 11 on this page a text exchange -- or a text message 12 from you to your personal assistant, Stephen 13 Deuters, on September 3rd, 2015? 14 A That's what it looks like, yes, sir. 15 MR. ROTTENBORN: Your Honor, I'd move 16 for this admission of this exhibit with just that 17 text and the appropriate redactions, Exhibit 470. 18 MS. MEYERS: Again, relevance, Your 19 Honor. And cumulative. 20 THE COURT: I'll allow this one -- 21 MR. ROTTENBORN: Thank you, Your Honor. 22 THE COURT: -- with the redactions.
2244	1 these in, that's fine. 2 MR. ROTTENBORN: I'm happy to do that 3 to speed it along. I believe they're all 4 relevant. Because they all go toward his systemic 5 drug abuse. 6 THE COURT: Well, maybe they are 7 relevant, but that could have been taken 8 yesterday; then it wouldn't be relevant. That's 9 my problem. She objected to relevance. I have to 10 sustain at this time unless you lay a foundation. 11 MR. ROTTENBORN: Well, he's not going 12 to know when. 13 THE COURT: Then I guess you have to 14 wait until Ms. Heard. 15 MR. ROTTENBORN: I have pictures of him 16 passed out on the floor -- 17 MS. MEYERS: You have not allowed us to 18 lay that foundation. 19 THE COURT: If you have pictures of him 20 this past weekend passed out, they're not 21 relevant. 22 MR. ROTTENBORN: I take your point. In	2246	1 MR. ROTTENBORN: Permission to publish, 2 Your Honor? 3 THE COURT: All right. Yes, sir. 4 MR. ROTTENBORN: Thank you. 5 Q Mr. Depp, in the efforts to move this 6 along, I'm not going to read the whole thing, but 7 I'm going to start with the word "main bits," 8 which is five lines down. You write to 9 Mr. Deuters on September 3rd, 2015, "Main bits 10 needed are Xanax and Adderall, and I want no 11 judgment from Kipper or Debbie." Kipper means 12 Dr. David Kipper, correct? 13 A That's correct. 14 Q And Debbie means Debbie Lloyd, your 15 sobriety nurse, correct? 16 A That is correct. 17 Q "Just found out from Joel last night 18 how much I spent on having Kipper and Debbie 19 around. Millions and fucking millions, mate, all 20 the while Debbie just hung around, broad BCH, and 21 gave me new meds like every two weeks. She was on 22 set maybe four times. Wow," and five money

2247	<p>1 symbols, "Sorry, just how it is." 2 Did I read that right? 3 A You did. 4 MR. ROTTENBORN: Could we pull up 5 Exhibit 587, please? 6 This is a recording, Your Honor. 7 THE COURT: All right. And I already 8 have 587A, so this is 587B? 9 MR. ROTTENBORN: 587B, Your Honor. The 10 excerpts to be played are 19:40 through 19:53 and 11 23:04 through 23:29. 12 THE COURT: Any objection? 13 MS. MEYERS: No objection, Your Honor. 14 THE COURT: All right. 587B in 15 evidence. 16 (Whereupon, the following recording was 17 played.) 18 MS. HEARD: I wanted you. I just so 19 wanted to tell you I was thinking of you. I want 20 to be able to talk to you. I thought you would 21 keep clean and sober and that we would fix a lot 22 of our problems.</p>	2249	<p>1 MR. DEPP: You gotta stop. You gotta 2 stop with the coke and booze. Because you're 3 wrong. 4 MS. HEARD: All the coke you've done 5 today and all the booze you've drank today -- 6 MR. DEPP: By the way -- 7 MS. HEARD: -- has it helped you? 8 MR. DEPP: I just got it. 9 MS. HEARD: Has it helped us? 10 MR. DEPP: I just got the coke -- 11 MS. HEARD: Has it helped? 12 MR. DEPP: -- today. 13 MS. HEARD: Yeah, I know because 14 last -- yesterday you were a thousand times 15 better. Yesterday did we get -- 16 BY MR. ROTTENBORN: 17 Q I would like to turn, now, to a few 18 more of your words around the time that you went 19 into detox about how you viewed Amber's role in 20 that process, Mr. Depp. 21 MR. ROTTENBORN: Can you please pull up 22 Plaintiff's Exhibit 120_40.</p>
2248	<p>1 MR. DEPP: I'm never getting clean and 2 sober. 3 MS. HEARD: I know. 4 BY MR. ROTTENBORN: 5 Q In that clip, Mr. Depp, you tell 6 Ms. Heard, "I'm never getting clean and sober," 7 correct. 8 A It sounds like to me that -- yes, 9 either that or "I have never been clean and 10 sober." 11 Q Thank you. 12 A That's one of the -- 13 Q Thanks. 14 MR. ROTTENBORN: Let's go to 23:04, 15 please. 16 (Whereupon, the following recording was 17 played.) 18 MS. HEARD: I mean, the big picture, 19 the big scheme of things, it does nothing but hurt 20 us. And why? Because the coke and booze doesn't 21 make it easier for you to see how clearly that 22 is --</p>	2250	<p>1 And, Your Honor, 120_41 was admitted 2 the other day, but I would like to introduce this 3 as a separate exhibit. 4 THE COURT: So 120B, and that would be 5 _40, you said, 4-0? 6 MR. ROTTENBORN: Yes, Your Honor. 7 THE COURT: Okay. 8 Any objection to that? 9 MS. MEYERS: If I may, it just came up 10 on the screen. 11 THE COURT: Okay. 12 Q Mr. Depp, while they're looking at 13 that, is the second text from the bottom a text 14 that you sent to Amber's mom, Paige, on 15 August 19th, 2014? 16 A Yes, that's correct, sir. 17 Q And this is when you were either in the 18 middle of or finishing up your detox process from 19 Roxicodone, correct? 20 A That is correct. 21 THE COURT: All right. No objection? 22 MS. MEYERS: No objection, Your Honor.</p>

2251	1 THE COURT: Okay. 120B in evidence. 2 Do you want to publish? Oh, you did. 3 As is, correct? 4 MS. MEYERS: With the other text 5 messages redacted. 6 THE COURT: Okay. All right. 7 MS. MEYERS: Thank you. 8 MR. ROTTENBORN: Oh, with the -- sure. 9 THE COURT: Okay. You can publish. 10 Q And in this text message that you write 11 Amber's mom on August 19th, 2014, you say "My 12 Dearest Paige, how unbelievably kind and pure your 13 message was. I am beyond thankful to have you in 14 my life. There's no luckier man on this earth to 15 have the strength that Amber gives me, and the 16 full support of each of you individually that I've 17 gotten helps immeasurably. I don't need to 18 explain the horrors to you. You know as well as 19 I. What you do need to know, that your daughter 20 has risen far above the nightmarish task of taking 21 care of this poor old junkie. Never a second has 22 gone by that she didn't look out for me or have	2253	1 can publish. 2 Q Now, Mr. Depp, you testified on 3 Thursday that you saw nothing wrong with referring 4 to Amber as a lesbian camp counselor when she was 5 trying to get you to stop using drugs, but -- 6 A She had used that term before. 7 Q -- in this text, Mr. Depp, you say, 8 "Just to let you know that I'm fine, my angel. I 9 miss you, of course, but this was the right thing 10 to do to speed up the process. I love you more 11 than life. Yours, Steve." 12 Did I read that correctly? 13 A You did. 14 MR. ROTTENBORN: You can take that 15 down. 16 Q Now, you've brought this lawsuit about 17 the op-ed specifically. But for years prior to 18 the date that Ms. Heard wrote the op-ed, there 19 were numerous negative news stories about you; 20 you'd agree with that, correct? 21 MS. MEYERS: Objection. Compound. 22 THE COURT: All right. I'll sustain as
2252	1 her eyes on me to make sure that I was okay. Why 2 in words are truly feeble in attempting to explain 3 her heroism in a text. Suffice to say that I have 4 never met or loved a woman or a thing more. She 5 has the strength of a thousand men, and that is 6 due to no one or nothing but you, sweetheart. 7 Thank you. I love you. Your son out law." 8 Did I read that correctly? 9 A You did, sir. 10 MR. ROTTENBORN: I would like to take a 11 look at another document, Exhibit 272, please. 12 Q Is this a text message that you shared, 13 text message exchange between you and Amber the 14 following day, on April 20th, 2014? 15 A Yes, sir. 16 MR. ROTTENBORN: Your Honor, I move for 17 the admission of 272 and ask for permission to 18 publish. 19 MS. MEYERS: With the identifiers 20 removed, we have no objection. 21 THE COURT: All right. Remove the 22 identifiers. 272 in evidence as redacted. You	2254	1 to compound. 2 Q For years prior to 2018, when Amber 3 wrote the op-ed, there were numerous negative news 4 stories about you that were released into the 5 public, correct? 6 MS. MEYERS: Objection. Calls for 7 speculation. 8 THE COURT: I'll allow it if he can 9 answer. 10 A By 2018, you say? 11 Q Correct. 12 A Yes. It all started with Ms. Heard 13 going to -- going directly to a court to get a 14 TRO, which is with a bruise on her face and 15 paparazzi. That was the sort of beginning of the 16 ball rolling down the hill and gaining momentum. 17 Q There were lots of negative stories 18 about you prior to May 27th, 2016, when Amber went 19 into court, correct? 20 MS. MEYERS: Objection. Asked and 21 answered. 22 THE COURT: Now it's 2016. I'll allow

2255	<p>1 it if he can answer it.</p> <p>2 Q There are plenty of negative stories</p> <p>3 about you prior to that date, weren't there?</p> <p>4 A So, I've been in this racket of</p> <p>5 Hollywood since 1984. My –</p> <p>6 Q Mr. Depp, I'm asking you a yes-or-no</p> <p>7 question. There was plenty of negative news</p> <p>8 stories about you prior to May 27th, 2016,</p> <p>9 correct?</p> <p>10 A From 1984 up until then, there are</p> <p>11 both. So of course people write negative stories.</p> <p>12 Q Sure. But you just testified to the</p> <p>13 jury that it all started on May 27th, 2016. So</p> <p>14 that's why I asked you to clarify about the</p> <p>15 negative stories prior to that date. And you'd</p> <p>16 agree that there were, correct?</p> <p>17 A Can you be specific about the stories?</p> <p>18 Of course there have been negative stories.</p> <p>19 MR. ROTTENBORN: Permission to</p> <p>20 approach, Your Honor.</p> <p>21 THE COURT: All right.</p> <p>22 MR. ROTTENBORN: Your Honor, I have</p>	2257	<p>1 THE COURT: You said he said that there</p> <p>2 were articles written, so it's not impeachment.</p> <p>3 What is it?</p> <p>4 MR. ROTTENBORN: So I'm going to</p> <p>5 introduce them as evidence -- so defamation we</p> <p>6 focus a lot on falsity, but the words also have to</p> <p>7 be defamatory. And the Schaecher case, Virginia</p> <p>8 Supreme Court case, 290 Va. 83, says that</p> <p>9 "Defamatory words" -- you have to have the</p> <p>10 defamatory staying -- "Defamatory words are those</p> <p>11 tending so to harm the reputation of another as to</p> <p>12 lower him in the estimation of the community or to</p> <p>13 deter third persons from associating with him,"</p> <p>14 and then they go on to describe the nature of</p> <p>15 that. The Court says, "We have stated that</p> <p>16 defamatory language 'tends to injure one's</p> <p>17 reputation in the common estimation of mankind, to</p> <p>18 throw contumely, shame, or disgrace upon him, or</p> <p>19 which tends to hold him up to scorn, ridicule, or</p> <p>20 contempt, or which is calculated to render him</p> <p>21 infamous, odious, or ridiculous."</p> <p>22 So this goes directly to elements that</p>
2256	<p>1 here numerous exhibits in one sort of compendium,</p> <p>2 all press articles about Mr. Depp, if I may</p> <p>3 approach.</p> <p>4 THE COURT: All right. Thank you.</p> <p>5 MR. ROTTENBORN: May I approach the</p> <p>6 witness?</p> <p>7 THE COURT: All right. Yes, sir.</p> <p>8 THE WITNESS: Thank you so much.</p> <p>9 MS. MEYERS: Your Honor, having</p> <p>10 received this, I would like to preemptively lodge</p> <p>11 a hearsay, lack of foundation.</p> <p>12 THE COURT: He hasn't got them into</p> <p>13 evidence. Are you moving these into evidence?</p> <p>14 MR. ROTTENBORN: No. I'm happy to</p> <p>15 approach, but they're certainly not being admitted</p> <p>16 for the truth of the matter asserted. But I'm</p> <p>17 happy to approach.</p> <p>18 THE COURT: All right. Come forward.</p> <p>19 (Sidebar.)</p> <p>20 THE COURT: I mean, if they don't come</p> <p>21 in, you're just going to use them to what?</p> <p>22 MR. ROTTENBORN: So, yeah.</p>	2258	<p>1 they have to prove in order to win this case, that</p> <p>2 not only were the statements false, but that they</p> <p>3 have had the defamatory sting. And so the fact</p> <p>4 that all of these articles, you know, a drop in</p> <p>5 the bucket, that these were out there, what I</p> <p>6 propose to do is to get him to admit that this</p> <p>7 headline is not hearsay. It's for his reputation</p> <p>8 what the public knew, whether true or not, and I'd</p> <p>9 just like to go through them, so that's why I gave</p> <p>10 them all to him at once, so we could move</p> <p>11 expeditiously through this. I will say one of</p> <p>12 them is the headline or the subject of the U.K.</p> <p>13 suit. I don't plan to emphasize that.</p> <p>14 THE COURT: I don't see how they can</p> <p>15 get into evidence. If you maybe ask him.</p> <p>16 MR. ROTTENBORN: I'll ask him about it.</p> <p>17 I don't need to get them in, but I would like to</p> <p>18 go through and get him to acknowledge that as of</p> <p>19 this date, an article was written that said why.</p> <p>20 And if they don't come into evidence, that's fine</p> <p>21 at this point. I think they'll be -- I think that</p> <p>22 that's very relevant, and under the Schaecher</p>

2259	1 case, it goes to the heart of what he has to 2 prove. 3 MS. MEYERS: Your Honor, most of these 4 articles have absolutely nothing to do with the 5 defamatory statements that were made in the op-ed, 6 which is that he was an abuser of a woman. These 7 are completely irrelevant. 8 MR. ROTTENBORN: Doesn't matter. 9 MS. MEYERS: This goes to a completely 10 different aspect of reputation that's not at issue 11 in this case. 12 MR. ROTTENBORN: Doesn't matter. It's 13 reputation as a whole is what the Supreme Court 14 says that you look at. "Or intending so to harm 15 the reputation of another as to lower him in the 16 estimation of the community," when you look at 17 these articles, something by Ms. Heard saying, 18 "Two years ago, I became a public figure 19 representing domestic abuse" is a lot less likely 20 to have any impact. 21 THE COURT: But this one doesn't come 22 in. You can't ask him about this one.	2261	1 whatever statement is the subject of defamation 2 case is going to potentially carry more defamatory 3 sting than someone who's had all of this stuff 4 written about him. 5 MS. MEYERS: Your Honor, an article 6 does not establish what someone's reputation is. 7 THE COURT: It's out in the public 8 because he's a public person, so I understand 9 that. I'm just -- I'm just seeing which ones of 10 these are cumulative. 11 MR. ROTTENBORN: That one that you're 12 looking -- all right. 13 THE COURT: None of them come into 14 evidence, but you can ask him about them. 15 MR. ROTTENBORN: Thank you. I'll take 16 that out. 17 THE COURT: And you're just doing the 18 headlines? 19 MR. ROTTENBORN: Yes, nothing more. 20 THE COURT: And the dates, I assume? 21 MR. ROTTENBORN: And the dates, yes, 22 Your Honor.
2260	1 MR. ROTTENBORN: Okay. I won't. 2 THE COURT: I have to go through these 3 separately. 4 MS. MEYERS: Your Honor, I mean, the 5 headlines themselves are hearsay. They lack any 6 foundation. I mean, some of these are tabloids. 7 MR. ROTTENBORN: They're not hearsay. 8 They're not being offered for the truth of the 9 matter asserted. 10 THE COURT: But they are being offered 11 because you're saying they ruined his reputation. 12 MR. ROTTENBORN: I know but it's 13 something that says, "Apparently Johnny Depp was 14 drunk." I don't care if Johnny Depp was drunk, 15 but if that's out in the public, that's directly 16 relevant to his reputation. I'm not saying that 17 they prove something. I'm saying that the public 18 knew -- that these were out there, and that's -- 19 under the Schaecher case, that's the heart of the 20 case, Your Honor. If he had been someone with a 21 crystal clean record who had never had any 22 negative press about him, whatever's being sued,	2262	1 THE COURT: The date of the op-ed 2 again? 3 MR. ROTTENBORN: December 18, 2018. 4 THE COURT: I think we already did this 5 one. 6 MR. ROTTENBORN: We did. I'll take it 7 out. 8 THE COURT: You want to see the ones? 9 MR. ROTTENBORN: Yeah, okay. 10 THE COURT: If you want to switch 11 stacks with me, I can -- if you want to make sure. 12 MR. ROTTENBORN: Sure. 13 THE COURT: You might take a look at 14 what I have. 15 MS. MEYERS: Thank you. 16 MR. ROTTENBORN: I'm just going to set 17 these to the side. 18 MS. MEYERS: I would maintain my 19 relevance objection. 20 THE COURT: It's reputation of a public 21 person, so that's out in the public. They're not 22 coming into evidence, but he can question about it

2263	1 and you can redirect about it as well. But I just 2 want to make sure. 3 MR. ROTTENBORN: Your Honor, with this 4 one, I would propose to read the title but then 5 the subtitle as well. 6 THE COURT: Okay. That's fine. 7 MS. MEYERS: Can I see the subtitle? 8 MR. ROTTENBORN: After this, I only 9 have one little module, and then I'm done. 10 THE COURT: Okay. Thank you. 11 MR. ROTTENBORN: Thank you, Your Honor. 12 Can I get that back from the witness? Maybe it 13 might make sense for me to -- 14 THE COURT: That one. You can take 15 mine if you like. 16 MR. ROTTENBORN: Okay. I think there 17 were only four. I can just take his out really 18 quick. 19 THE COURT: Okay. 20 MR. ROTTENBORN: Do you want to give 21 this to the witness, please. And then this has 22 the full set.	2265	1 Ceremony," correct? 2 A That's what it says, yes, sir. 3 Q And the next article is an article from 4 May 7th, 2016. It's entitled, "Johnny Depp: 5 Friends and Family Seriously Concerned About Him. 6 Here's Why." 7 A Yes. How did they know? 8 Q The next article, from May 1st, 2017 -- 9 A Yes. 10 Q -- before Ms. Heard filed for 11 restraining order, a year and a half before she 12 published -- no, sorry, this would be after 13 May 1st, 2017, the headline is "Johnny Depp Has a 14 Clear and Epic Sense of Entitlement, Ex-managers 15 Say." 16 A Yes. 17 Q That was in the Hollywood Reporter, 18 correct? 19 A I was in a lawsuit with them, so... 20 Q The next article, from May 10th, 2017, 21 is entitled, "Johnny Depp: A Star in Crisis and 22 the Insane Story of His Missing Millions."
2264	1 THE COURT: Okay. 2 MR. ROTTENBORN: But I'll let you know 3 when I skip over one. 4 THE COURT: Okay. That's fine. Thank 5 you. 6 (Open court.) 7 BY MR. ROTTENBORN: 8 Q Mr. Depp, if you could, please take a 9 look at the stack of articles in front of you. 10 A Yes. It's a stack of head pieces 11 generated by Ms. Heard's publicity team. 12 Q Mr. Depp, we're going to try to get 13 through this as quickly as possible. 14 A I'm just stating what they are, sir. 15 Q Well, we're going to talk about them. 16 The first one is entitled from -- is from the 17 Guardian. 18 Do you see that? 19 A Apparently drunk, yes. 20 Q Yeah. And this is an article from 21 November 15th, 2014, entitled "Apparently Drunk 22 Johnny Depp Cut Off at Hollywood Film Awards	2266	1 Did I read that right? 2 A Yes. That's straight from the same 3 lawsuit, sir. 4 Q The next article, also from May 10th, 5 2017, a year and a half before the op-ed was 6 published, says, "Johnny Depp Reportedly Drank 7 Heavily and Was Constantly Late on the New Pirates 8 Movie Set." 9 Did I read that right? 10 A You did. "Reportedly." 11 Q The next article, also from May 10th -- 12 A This is a pathetic attempt -- 13 Q Mr. Depp, please just respond to the 14 question that I'm asking you. 15 A What's your question, sir, 16 Mr. Rottenborn? 17 Q The next document, an article published 18 in Vanity Fair on May 10th, 2017 -- 19 A Yes, sir. 20 Q -- is entitled, "Johnny Depp's 21 Financial Woes Might Sink the next Pirates of the 22 Caribbean."

2267	1 Did I read that right? 2 A You did. I don't know how – 3 Q The next one, May 25th, 2017, a year 4 and a half before the op-ed was published, an 5 article entitled, "Where did it all go wrong for 6 Johnny Depp? After a string of flops and a ton of 7 bad press, Johnny Depp's star power looks as 8 wobbly as Jack Sparrow on a plank." 9 Did I read that right? 10 A You read that very, very well. 11 Q The next one, Hollywood Reporter, 12 May 27th, 2017, headline, "Pirates of the 13 Caribbean: The Diminishing Returns of Johnny 14 Depp." 15 Did I read that right? 16 A You certainly did. Hollywood Reporter 17 were very nice to me. 18 Q July 12, 2017, "Why are all of Johnny 19 Depp's movies bombing at the box office?" Did I 20 read that right? 21 A You certainly did. 22 Q November 4th, 2017, a year and a month	2269	1 Depp." 2 Did I read that right? 3 A You did. You should read the article. 4 It's wonderful. 5 Q And the last one, the last one, 6 June 22nd, 2018, the Daily Mail, "Vodka for 7 breakfast, 72-hour Drug Binges and Spending Sprees 8 that Beggar Belief: Allison Boshoff reveals why 9 Hollywood's reeling over what's being called 10 'Johnny Depp's career suicide note.'" 11 Did I read that correctly? 12 A You did. Who is Allison Boshoff, and 13 how does she know? 14 Q Mr. Depp, you can't name -- 15 A Oh, I see. 16 Q -- a single actress who has benefited 17 in her career by coming forward and stating that 18 she was a victim of domestic violence, can you? 19 A I'm sorry, what? 20 MS. MEYERS: Objection. Calls for 21 speculation. 22 THE COURT: I'll sustain the objection.
2268	1 before Amber published the op-ed, headline, 2 "Johnny Depp allegedly showed up drunk to movie 3 premiere, reports say." 4 Did I read that correctly? 5 A "Reports say," this is hearsay. 6 Q June 21st, 2018 -- 7 A Okay. Right. 8 Q -- six months before the op-ed was 9 published, Vanity Fair article, "The Real Reason 10 Johnny Depp Used an Earpiece on a Film Set." 11 A I think that was explained in court the 12 other day. 13 Q Did I read that correctly? 14 A Oh, you did, yeah. 15 Q June 24th, 2018, six months before the 16 op-ed was published -- 17 A Uh-huh. 18 Q -- a Rolling Stone article entitled, 19 "The Trouble with Johnny Depp: 20 Multimillion-dollar lawsuits, a haze of booze and 21 hash, a marriage gone very wrong, and a lifestyle 22 he can't afford, inside the trials of Johnny	2270	1 Next question. 2 Q When Amber made abuse accusations 3 against you in May 2016, fair to say it got a lot 4 of press attention, right? 5 MS. MEYERS: Objection. Calls for 6 speculation. 7 THE COURT: All right. I'll sustain 8 the objection. 9 Next question. 10 Q When Amber made abuse allegations 11 against you in May of 2016, you became aware that 12 it got a lot of press attention, correct? 13 A Very quickly, I became aware. 14 Q And she became associated with those 15 abuse accusations that she made against you in 16 May 2016, correct, to your knowledge? 17 MS. MEYERS: Objection. Calls for 18 speculation. 19 THE COURT: I'll sustain the objection. 20 Next question. 21 Q You became associated with those 22 domestic abuse accusations that she made against

2271	<p>1 you, correct?</p> <p>2 A I think that's clear, yes.</p> <p>3 Q And you understood that she became</p> <p>4 associated with those same accusations that she</p> <p>5 made, correct? You testified to that?</p> <p>6 A Well, she had a choice; I didn't.</p> <p>7 Q And you've talked about the immediate</p> <p>8 impact that those accusations on May 27th, 2016,</p> <p>9 allegedly had on your career, correct?</p> <p>10 A Yes.</p> <p>11 Q You testified earlier in your</p> <p>12 examination on direct that when Amber made those</p> <p>13 accusations in 2016, you said you lost "nothing</p> <p>14 less than everything," correct?</p> <p>15 A That is correct, sir.</p> <p>16 Q But you didn't try to get the</p> <p>17 restraining order lifted in 2016, did you?</p> <p>18 A I don't -- if she wanted a restraining</p> <p>19 order --</p> <p>20 Q It's a yes-or-no question. You didn't</p> <p>21 try to get the restraining order lifted?</p> <p>22 A No. Why would I?</p>	2273	<p>1 at that time through any sort of legal proceeding,</p> <p>2 correct?</p> <p>3 MS. MEYERS: Objection. Asked and</p> <p>4 answered.</p> <p>5 THE COURT: I'll sustain the objection.</p> <p>6 Next question.</p> <p>7 Q And you chose to sign a divorce</p> <p>8 agreement in which you stated that Amber had not</p> <p>9 made any false statements against you for</p> <p>10 financial gain. We looked at that, correct?</p> <p>11 MS. MEYERS: Objection. Asked and</p> <p>12 answered.</p> <p>13 THE COURT: Asked and answered. I'll</p> <p>14 sustain the objection.</p> <p>15 Next question.</p> <p>16 Q In fact, you waited until Amber wrote</p> <p>17 the op-ed in the Washington Post in December of</p> <p>18 2018 to file a lawsuit against her, correct?</p> <p>19 A That is correct.</p> <p>20 MR. ROTTENBORN: Can you pull up</p> <p>21 Plaintiff's Exhibit 2, please.</p> <p>22 A It was the only time that I was able to</p>
2272	<p>1 Q And you didn't have a divorce trial</p> <p>2 where you could respond to Amber's accusations of</p> <p>3 abuse in 2016, did you?</p> <p>4 MS. MEYERS: Objection. Calls for a</p> <p>5 legal conclusion.</p> <p>6 MR. ROTTENBORN: I'm asking if he had a</p> <p>7 trial.</p> <p>8 THE COURT: I'll allow it.</p> <p>9 Q You didn't have a divorce trial where</p> <p>10 you could respond to Amber's accusations of abuse,</p> <p>11 did you?</p> <p>12 A No. There were no charges pressed</p> <p>13 against me.</p> <p>14 Q You chose not to --</p> <p>15 A She didn't tell the police that I had</p> <p>16 done anything. She didn't mention my name.</p> <p>17 Q And you didn't have a California</p> <p>18 divorce judge decide these facts, did you?</p> <p>19 MS. MEYERS: Objection. Asked and</p> <p>20 answered.</p> <p>21 THE COURT: I'll sustain the objection.</p> <p>22 Q You chose not to try to clear your name</p>	2274	<p>1 speak and use my own voice.</p> <p>2 Q You chose not to sue The Washington</p> <p>3 Post in this lawsuit, correct?</p> <p>4 MS. MEYERS: Objection. Relevance.</p> <p>5 Asked and answered.</p> <p>6 MR. ROTTENBORN: It's not been asked</p> <p>7 and answered.</p> <p>8 THE COURT: Hasn't been asked and</p> <p>9 answered, but I'm not sure what the relevance is.</p> <p>10 Q You chose to sue only Ms. Heard and not</p> <p>11 the newspaper that published this article,</p> <p>12 correct?</p> <p>13 MS. MEYERS: Objection. Compound.</p> <p>14 THE COURT: Sustain as to compound.</p> <p>15 Q You chose not to sue The Washington</p> <p>16 Post, correct?</p> <p>17 MS. MEYERS: Objection. Relevancy.</p> <p>18 THE COURT: I'll sustain the objection.</p> <p>19 Q You only sued the author of this</p> <p>20 article, Amber Heard, correct?</p> <p>21 A Which seems she was the one making the</p> <p>22 statements. Yes, I had the opportunity to fight</p>

2275	<p>1 back.</p> <p>2 MR. ROTTENBORN: Permission to publish</p> <p>3 Exhibit 2, Your Honor?</p> <p>4 THE COURT: All right. Exhibit 2</p> <p>5 already in evidence. Publish.</p> <p>6 Q Mr. Depp, you realized that the only</p> <p>7 job for this jury to decide --</p> <p>8 A Yes, sir.</p> <p>9 Q Its only job is to determine whether</p> <p>10 this op-ed, and this op-ed alone, is defamatory?</p> <p>11 MS. MEYERS: Objection. Calls for a</p> <p>12 legal conclusion.</p> <p>13 THE COURT: I'll sustain the objection.</p> <p>14 Q This is the only writing that you</p> <p>15 are -- that's the subject of this lawsuit that you</p> <p>16 brought, correct?</p> <p>17 MS. MEYERS: Same objection.</p> <p>18 MR. ROTTENBORN: It's fact, Your Honor.</p> <p>19 THE COURT: I'll allow that question.</p> <p>20 I'll allow that question.</p> <p>21 A This is a version of that story of the</p> <p>22 op-ed that I've never seen. The one that was</p>	2277	<p>1 objections.</p> <p>2 Q In fact, this article doesn't contain</p> <p>3 any details of your relationship with Ms. Heard?</p> <p>4 MS. MEYERS: Objection. Asked and</p> <p>5 answered.</p> <p>6 THE COURT: I'll sustain the objection.</p> <p>7 Q The only thing that this article</p> <p>8 states, Mr. Depp, is that in 2016, Amber made</p> <p>9 accusations of domestic abuse, correct?</p> <p>10 A It was clear that she'd made</p> <p>11 11 allegations in 2016.</p> <p>12 Q And she did that when she obtained a</p> <p>13 restraining order against you in 2016, correct?</p> <p>14 A Yeah, I suppose. Yes, yes.</p> <p>15 Q And even if you disagree with the</p> <p>16 accusations that she made against you in May 2016,</p> <p>17 it is a true fact that she did make those</p> <p>18 accusations in 2016 and got a restraining order</p> <p>19 against you, correct?</p> <p>20 MS. MEYERS: Objection. Compound,</p> <p>21 asked and answered.</p> <p>22 THE COURT: Sustain the objections.</p>
2276	<p>1 published before the one that -- the only one I've</p> <p>2 ever seen is the one that was published prior to</p> <p>3 this. They changed the title because they were in</p> <p>4 fear of trouble.</p> <p>5 MR. ROTTENBORN: Well, I move to strike</p> <p>6 that last testimony, Your Honor.</p> <p>7 A Well, I mean --</p> <p>8 Q Whether it's the online edition or this</p> <p>9 edition in the paper, this article is the only</p> <p>10 statement, the only publication of anything that's</p> <p>11 the subject of the lawsuit that you brought,</p> <p>12 correct?</p> <p>13 MS. MEYERS: Objection. Asked and</p> <p>14 answered.</p> <p>15 THE COURT: I'll sustain the objection.</p> <p>16 Q This op-ed, Mr. Depp, does not discuss</p> <p>17 any of the details of your relationship that we've</p> <p>18 seen in text and emails and recordings over the</p> <p>19 past few days, does it?</p> <p>20 MS. MEYERS: Objection. Compound and</p> <p>21 asked and answered.</p> <p>22 THE COURT: I'll sustain both</p>	2278	<p>1 Next question.</p> <p>2 Q To your knowledge, the words that</p> <p>3 Ms. Heard used in this article about getting a</p> <p>4 restraining order against you in 2016, those are</p> <p>5 true, correct?</p> <p>6 A I'm sorry?</p> <p>7 MS. MEYERS: Objection. Misstates the</p> <p>8 document.</p> <p>9 THE COURT: All right. I'll sustain</p> <p>10 the objection.</p> <p>11 Q Can you go to the third paragraph.</p> <p>12 MR. ROTTENBORN: Pull up the third</p> <p>13 paragraph, please.</p> <p>14 Q The statement that, then two years ago</p> <p>15 Ms. Heard became a public figure representing</p> <p>16 domestic abuse, that is true, isn't it?</p> <p>17 A I'm not sure what we're looking at.</p> <p>18 MS. MEYERS: Objection.</p> <p>19 A Oh, I see it.</p> <p>20 MS. MEYERS: Calls for a legal</p> <p>21 conclusion.</p> <p>22 THE COURT: I'll sustain the objection.</p>

2279	1 I'll sustain the objection. 2 Q And in 2016, for the first time 3 publicly, Ms. Heard accused you of domestic abuse, 4 correct? 5 A In 2016? 6 Q Yes. 7 A That's correct. 8 MR. ROTTENBORN: No further questions. 9 THE COURT: All right. Ladies and 10 gentlemen, why don't we go ahead and take our 11 morning recess for 15 minutes? Do not do any 12 outside research, and do not talk to anybody about 13 the case, okay? Come back in 15 minutes. 14 (Whereupon, the jury exited the 15 courtroom and the following proceedings took 16 place.) 17 THE COURT: All right. So let's just 18 come back at 12:05; shall we do that? 19 MR. ROTTENBORN: Thank you, Your Honor. 20 THE COURT: All right. Thank you. 21 MR. CHEW: Thanks. 22 THE BAILIFF: All rise.	2281	1 MS. MEYERS: I would move Exhibit 1, 2 Plaintiff's Exhibit 1, into evidence and ask that 3 it be published to the jury. 4 THE COURT: All right. Any objection? 5 MR. ROTTENBORN: No objection. 6 THE COURT: All right. 1 in evidence 7 and published. 8 Q Mr. Depp, when did you see Ms. Heard's 9 December 18, 2018 op-ed for the first time? 10 A It was presented to me by one of my 11 team. I can't remember. But it was within a day 12 or so of it, couple of days of it having been 13 written, I believe. 14 Q And what was your reaction when you saw 15 it? 16 A Shock. 17 Q Why were you shocked? 18 A Because I, at that point, it had been a 19 good, solid two or so years of this – of the 20 accusations of the allegations planted firmly on 21 my back, so something that I had to carry with me, 22 and I just couldn't believe that it was
2280	1 (Recess taken from 11:47 a.m. to 2 12:05 p.m.) 3 THE BAILIFF: All rise. Please be 4 seated and come to order. 5 THE COURT: All right. Are we ready 6 for the jury? 7 MR. CHEW: Yes, Your Honor. 8 (Whereupon, the jury entered the 9 courtroom and the following proceedings took 10 place.) 11 THE COURT: All right. Be seated and 12 redirect. 13 EXAMINATION BY COUNSEL FOR THE PLAINTIFF AND 14 COUNTERCLAIM DEFENDANT 15 BY MS. MEYERS: 16 Q Good afternoon, Mr. Depp. 17 A Hi. 18 MS. MEYERS: Could we please pull up 19 Plaintiff's Exhibit 1. 20 Q Mr. Depp, is this the version of the 21 op-ed that you recognize? 22 A Yes. That's the one.	2282	1 continuing – that it was continuing in such a way 2 that the – it was clear the more bad press, the 3 more hit pieces that came out on me, the more of 4 these stories of Ms. Heard and her righteous chase 5 against me, it wasn't stopping. And it's 6 difficult to – once you've chewed on it for a 7 couple of years, it becomes pretty difficult to 8 swallow anymore, as it was completely untrue. 9 Q How did you feel when you saw the op-ed 10 for the first time? 11 MR. ROTTENBORN: Objection. Asked and 12 answered just now. 13 MS. MEYERS: My prior question was 14 about his reaction. 15 THE COURT: All right. I'll allow it. 16 A Hurt. Yeah, a blinding hurt. It was 17 like somebody had hit me in the back of the head 18 with a two-by-four. And, as I said, I had no – I 19 had had no ability to speak prior to, because even 20 if I had done an interview to try to explain 21 myself, it turned into a hit piece. So my mouth 22 was shut, and this was the opportunity where I

2283	<p>1 thought something's got to be done. It's just got 2 to be done. I couldn't take it anymore. 3 Q When did you first learn that Disney 4 was not going to recast you in the Pirates 5 franchise? 6 A It was probably two or three days after 7 this op-ed appeared. One of my crew -- again, I 8 don't remember who had sent me -- excuse me -- had 9 sent me a piece that was in some magazine and Sean 10 Bailey, who was the number 3 -- 11 MR. ROTTENBORN: Objection. Hearsay. 12 THE COURT: I don't know yet. I'll 13 overrule it at this point. 14 MR. ROTTENBORN: Thank you. 15 THE WITNESS: May I continue, Your 16 Honor? 17 THE COURT: Yes, sir. 18 THE WITNESS: Thank you. 19 A Sean Bailey, who was the third in line, 20 I suppose, in the upper echelon of Disney, just 21 basically said -- 22 MR. ROTTENBORN: Objection. Hearsay.</p>	2285	<p>1 at the time, I don't know what his status is 2 anymore. But at the time, he was the number 3 3 sort of upper echelon of Disney top dogs, and Sean 4 Bailey was quoted as saying that -- 5 MR. ROTTENBORN: Objection. Hearsay. 6 THE COURT: All right. 7 Q Mr. Depp, where was Sean Bailey quoted 8 without getting into what he was quoted as saying? 9 A He was quoted in whatever the article 10 was that I was -- that was brought to my 11 attention. 12 Q And can you please just clarify what 13 article you're referring to? 14 A I don't know what journal it came from. 15 I don't know what magazine. I don't know any of 16 that, so I don't know. I don't know who did the 17 interview with him. 18 MR. ROTTENBORN: Objection. Lack of 19 foundation. 20 THE COURT: I'll overrule the 21 objection. 22 Go ahead.</p>
2284	<p>1 MS. MEYERS: Your Honor, this is -- 2 MR. ROTTENBORN: As to what Sean Bailey 3 said. 4 MS. MEYERS: This is about him learning 5 about it. It's not for the truth. 6 MR. ROTTENBORN: It is the truth. 7 THE COURT: Do you want to approach? 8 (Sidebar.) 9 MR. ROTTENBORN: She's soliciting 10 testimony on what Sean Bailey said to him about 11 what Disney was going to do with him. It's 12 hearsay. 13 MS. MEYERS: Well, I was asking about 14 how he learned about it. 15 THE COURT: Okay. Redirect him. 16 MR. ROTTENBORN: Thank you. 17 BY MS. MEYERS: 18 Q Mr. Depp, could you please explain to 19 the jury who Sean Bailey is? I think you were 20 starting to. 21 A Yes. I'll try again. 22 Sean Bailey is the number 3 -- or was</p>	2286	<p>1 Q Mr. Depp, how did you feel when you 2 learned that you were being dropped from the 3 Pirates of the Caribbean franchise? 4 A Well, it was -- the Pirates of the 5 Caribbean franchise, it was the character that -- 6 Captain Jack Sparrow was a character that I had 7 built from the ground up and was something that 8 I -- I, of course, put a lot of -- as you do with 9 all characters, but you put a lot of yourself into 10 the characters. And also having worked on these 11 films with these people and having added much of 12 myself, much of my own rewriting of the dialogue 13 and scenes and the jokes and whatever they are, I 14 didn't quite understand how that -- after that 15 long relationship and quite a successful 16 relationship, certainly, for Disney, that they 17 would -- that suddenly I was guilty until proven 18 innocent. 19 Q Up until the point that you learned 20 that you were not going to be in the Pirates of 21 the Caribbean franchise any longer, what was your 22 intention with respect to future Pirates movies?</p>

2287	1 A The last thing that I knew from the – 2 I say the – there's the producer team, there's 3 the creative team, and there were many 4 discussions. I, in fact, had been approached to 5 take part in writing Pirates 6. 6 MR. ROTTENBORN: Objection. Hearsay. 7 Q Mr. Depp, what was your intention with 8 respect to future Pirates movies, aside from what 9 you'd been asked to do? 10 A My feeling was that these characters 11 should be able to have their proper good-bye, as 12 it were. A franchise can only last for so long. 13 And there's a way to end a franchise like that, 14 and I thought that the characters deserved to have 15 their – their way out of – to end the franchise 16 on a very good note. I planned on continuing 17 until it was time to stop. 18 Q Mr. Depp, last week Mr. Rottenborn 19 asked you about a quote where you said you 20 wouldn't come back to the Pirates franchise for 21 \$300 million and a million alpacas; do you 22 remember that?	2289	1 Q And what year would that have been, if 2 you can recall? 3 A I believe it was last year or so. 4 MS. MEYERS: Can you please pull up 5 Plaintiff's Exhibit 804. 6 Q Mr. Depp, do you recognize this 7 document? 8 A As soon as my eyes go on, I hopefully 9 will. 10 Scaramanga Brothers. Yes. 4 and 5, 11 11 yes. 12 Q What is this document? 13 A I don't quite know. I'd have to read 14 it to get some – 15 MS. MEYERS: Could we -- 16 A – understanding of it. 17 MS. MEYERS: Could we scroll through so 18 Mr. Depp can look at the rest of this document. 19 A There it goes. 20 This appears to me to be some species 21 21 of contract, no? 22 Q Is this a contract that you entered
2288	1 A I do. 2 Q When, relative to learning that you 3 would no longer be a part of the Pirates 4 franchise, did you make that statement? 5 A I think long before I made the 6 statement, there was a very deep and distinct 7 sense of having been betrayed by the people that I 8 had been working with, the people that I had 9 worked hard for, the people that I had delivered a 10 character to that they initially despised, but 11 somehow, you know, even -- I stuck to my guns with 12 the character, and it seemed to work. 13 Q Do you recall when, specifically, you 14 made that statement about the \$300 million and the 15 hundred alpacas? 16 MR. ROTTENBORN: Objection. Asked and 17 answered. 18 THE COURT: Overruled. I'll allow it. 19 A I believe I made that statement during 20 a press conference in the San Sebastian film 21 festival when I was asked about my, well, 22 situation.	2290	1 into? 2 A With Disney. 3 MS. MEYERS: Your Honor, I'd ask that 4 Plaintiff's Exhibit 804 be moved into evidence and 5 published. 6 THE COURT: Any objection? 7 MR. ROTTENBORN: I think it's outside 8 the scope of direct or cross-examination. 9 THE COURT: I'll overrule on that 10 objection. 11 MR. ROTTENBORN: Okay. And -- well, 12 I'll reserve other objections to portions of the 13 document, depending on what she's going to ask 14 about. It could be hearsay. 15 THE COURT: She's asking to put it all 16 into evidence right now. 17 MR. ROTTENBORN: Well, then I would 18 object to that at this point. 19 THE COURT: All right. You want to 20 come forward? 21 (Sidebar.) 22 MS. MEYERS: Your Honor, it's a

2291	1 contract. It's not hearsay. It's an agreement 2 amongst partners. 3 MR. ROTTENBORN: Well, a contract can 4 be hearsay. 5 MS. MEYERS: But it can be hearsay 6 (indiscernible due to cross talking) it's a 7 contract. 8 THE COURT: Is there a -- 9 MR. ROTTENBORN: With the cover letter 10 is (indiscernible) over the last -- 11 THE COURT: The cover letter 12 (indiscernible) of the contract. 13 MR. ROTTENBORN: Isn't their -- isn't 14 he first page -- maybe not. No. 15 MS. MEYERS: This isn't the contract. 16 MR. ROTTENBORN: Is the first page the 17 contract? 18 THE COURT: Let me see. It says, 19 "Ladies and Gentlemen" -- 20 MR. ROTTENBORN: Ladies and Gentlemen, 21 right. So there's a cover letter. 22 THE COURT: All right. So if we took	2293	1 what does this reflect? 2 A Sorry. It appears to be the agreement 3 of Pirates 4 and 5 compensation and merchandise. 4 Q Mr. Depp, at this time, how many other 5 franchise films had you been a part of? 6 A At that time, Alice in Wonderland, boy, 7 Alice in Wonderland. I'm so pathetic when it 8 comes to knowing what movies I've done. I'm 9 sorry. I just -- I don't watch them. I feel 10 better not watching them. 11 I couldn't -- what was the question 12 again? 13 THE COURT: Order in the court or I 14 will have you removed. Understood? Thank you. 15 Q How many other franchise films have you 16 been a part of at the time of this contract? 17 A There was a third. There was Pirates, 18 there was -- oh, sorry. With Warner Brothers, 19 Fantastic Beasts and Where to Find Them, and then 20 Crimes of Grindelwald. 21 Q And how does the compensation reflected 22 in this contract compare to that, what you
2292	1 out the cover letter -- 2 MR. ROTTENBORN: That's fine. 3 THE COURT: Just a contract without the 4 cover letter. 5 MS. MEYERS: Certainly. 6 THE COURT: So 804 minus page 1. 7 MS. MEYERS: Okay. 8 MR. ROTTENBORN: Thank you. 9 THE COURT: All right. 10 (Open court.) 11 THE COURT: So 804 will be in evidence 12 other than page 1, not page 1, but the contract 13 itself. 14 BY MS. MEYERS: 15 Q Mr. Depp, if -- 16 THE COURT: You can publish the second 17 page onward. And I expect to just get a redacted 18 copy of that at some point. 19 MS. MEYERS: Okay. 20 Q Mr. Depp, if I could direct your 21 attention to section 6 of the contract, which is 22 on pages 8 through 10 of the document, Mr. Depp,	2294	1 received for the other franchises that you've been 2 a part of? 3 MR. ROTTENBORN: Objection. 4 Foundation. 5 MS. MEYERS: He just established that 6 he was a member of other franchise films at this 7 point. 8 MR. ROTTENBORN: He hasn't established 9 a foundation that he knows how he was compensated. 10 THE COURT: I'll overrule the objection 11 if you can answer. 12 A I believe the compensation, obviously, 13 all of the pay and back end and all those things, 14 are negotiated by agents, lawyers, and this was -- 15 comparatively, this is -- my salary on that film 16 and other salaries were of a similar -- of a 17 similar status, I suppose. 18 Q If I could direct your attention to the 19 12th page of the document -- 20 A Yes. 21 Q -- is this your signature, Mr. Depp? 22 A Yes, it is.

2295	1 Q Okay. 2 MS. MEYERS: We can take this down. 3 Thank you. 4 Q Mr. Depp, I recall that you testified 5 that you don't know, during a given period, what 6 movies you were working on. So my question is who 7 would know that? 8 A Well, first and foremost, it's my agent 9 or agents. 10 I do recall a couple of the other films 11 that I had made after. One was initially called 12 Richard Says good-bye, and that was -- they 13 changed the name to The Professor. And during all 14 of the nastiness over the past six years, that 15 film went straight to pay-per-view. 16 There was another film called Minamata. 17 It was produced -- it was my company of Infinitum 18 Nihil, we had developed a film called Minamata, 19 about Eugene Smith and the Minamata of -- well, 20 the mercury poisoning of a very small fishing 21 village in southern Japan. There was that one. 22 And then there was a film called Waiting for the	2297	1 been -- there was a lot of -- in context it's 2 important to know none of it was ever intended to 3 be real, and the language that's used, which I -- 4 yes, I am ashamed that that has to be spread on 5 the -- on the world like peanut butter. 6 I -- for example, the text that is 7 about burning Ms. Heard is -- it's directly from 8 Monty Python in a sketch about burning witches and 9 then drowning the witches. This is a film that 10 we'd all watched when we were ten, and it's just 11 irreverent and abstract humor. That's what we 12 were referring to in those texts. 13 Q The text message that you just 14 referenced, other than Mr. Bettany, who else saw 15 that text message at the time that it was sent? 16 A No one. Of course not. 17 Q Based on your own observations, how 18 would you describe Mr. Bettany's relationship with 19 Ms. Heard while you and Ms. Heard were together? 20 A Abominable. 21 Q Why was that? 22 A Ms. Heard despised Mr. Bettany
2296	1 Barbarians, with Mark Rylance and Robert 2 Pattinson. Those were three films that I'd done. 3 Q Mr. Depp, during your 4 cross-examination, Mr. Rottenborn showed you a 5 number of text messages between you and Paul 6 Bettany. Do you remember that? 7 A I do. 8 Q Could you please explain to the jury 9 what your relationship with Mr. Bettany is? 10 A Mr. Bettany and I had -- we met while I 11 was making a film call The Tourist in Venice, and 12 we were -- it was an instant connection. He's 13 born and bred in the U.K. and has a -- that 14 English sort of dry, kind of obtuse, abstract 15 sense of humor, and that was one of the things 16 that we connected on is taking -- even if it was a 17 difficult or unpleasant situation, we would, you 18 know, do our best to deal with it with humor, as 19 opposed to just a constant complaint or whine or 20 anything of that nature. 21 We dealt with it with humor, albeit, 22 sometimes, as these are private texts, that have	2298	1 because -- mainly because we had become such close 2 friends and for her he was a threat and would take 3 me away from her with regard to if Paul Bettany 4 was getting the attention from me, that was a 5 showstopper. It would cause all kinds of 6 unpleasantries to the point where we were on the 7 island with Mr. Bettany, his wife, and his four 8 children, Ms. Heard and Mr. Bettany got into some 9 debate over lunch, and I just remember that 10 whenever Mr. Bettany tried to make a point, she 11 would talk over him and then it started to get 12 quite rude. 13 She got mean and she got loud, and then 14 his -- I believe it was his 18-year-old boy, who 15 was -- who was getting ready to go to a really -- 16 he's a very bright, brilliant, kid, he entered the 17 conversation because these -- this was something 18 to do with what he'd studied in school and he knew 19 quite a lot about it, and he voiced his opinion, 20 and Ms. Heard demeaned that young man to the point 21 of where he burst into tears and walked away. 22 And it was at that point that I had

<p style="text-align: right;">2299</p> <p>1 spoken to Ms. Heard and said, "That's just 2 unacceptable. That behavior is unacceptable. You 3 have no right to demean that boy. You cannot 4 always be right. You should try being wrong 5 sometime because you might learn something." 6 And then I asked her – I asked her 7 to – I thought it was best that she leave the 8 island. 9 MS. MEYERS: Could we please pull up 10 Defendant's Exhibit 245. 11 Q And, Mr. Depp, I believe this is 12 another text message with Mr. Bettany that you 13 were shown on your cross-examination. 14 A Oh, yeah. 15 Q And directing your attention to the 16 text message at the top of the page from May 30th, 17 2014, do you recognize this text message you sent 18 to Paul Bettany? 19 A Yes, I do. 20 Q And could you please describe to the 21 jury what you are conveying to Mr. Bettany in this 22 message?</p>	<p style="text-align: right;">2301</p> <p>1 And saying that I was too messed up in 2 the head was – it's kind of like if you've been 3 told since you were a child that everything you do 4 is wrong, and that you shouldn't have even been 5 alive, or whatever, you know, joyous little treats 6 that my then very sick, very ill mother brought to 7 me, Ms. Heard was well aware of my past, my 8 childhood, therefore, was very adept at knowing 9 exactly which buttons to push. 10 So at this point, I mean, I felt 11 like – well, I was that little boy again in my 12 head. Like, I guess I'm the – I guess I am 13 incapable of doing anything right. I guess I will 14 never be happy. I guess that this is who I am. I 15 can't get along with this person. But it was – 16 it's confusion. You know, it's nothing that you 17 can – it's nothing that anyone could sustain for 18 any length of time. It's nothing that anyone 19 should have to sustain for any length of time when 20 you're being demeaned, berated, judged, and 21 treated like a lesser animal. 22 I'm treated as if I'm only surrounded</p>
<p style="text-align: right;">2300</p> <p>1 A This is, again, it's a -- this is a, I 2 suppose, an example of the way that I write and 3 express myself. That is to say, you stretch -- 4 you stretch the -- you stretch your situation out 5 to give them the understanding that you're 6 drowning, essentially. So everything that I say 7 here is in fact an impossibility for the human 8 body. I would have been -- well, I would have 9 certainly at least had to be rushed to the 10 hospital for a stomach pump. 11 There's a line here that if you don't 12 mind I say, when I say "I'm done," I'm admittedly 13 too fucked, pardon me, fucked in the head to spray 14 my rage at the one I love for many reasons as 15 well. I'm too old to be that guy, but pills are 16 fine. 17 Pills that were referenced were -- were 18 the pills that I had had to -- or that I was 19 coming off of, and they were the only thing that 20 could give me some semblance of the same numbing 21 effect that I searched for as a child with my 22 mother.</p>	<p style="text-align: right;">2302</p> <p>1 by yes men and that I'm a bad father and that -- 2 it was -- these things were endless. They were 3 endless and they -- there was no call for them. 4 It's hard to understand why someone that is 5 supposed to love you could be that cruel. And 6 I -- there's also times where you just say, "Okay. 7 I'm going to try to not have a -- I won't fall for 8 the argument. I won't participate in the 9 argument," because I knew where it would go, into 10 her circular pattern of psychological abuse. 11 Q Mr. Depp, what do you mean when you use 12 the term "blackout" in this text message? 13 A Blackout -- oh, yes. Because I'm 14 talking about a thousand Red Bulls and vodkas, a 15 thousand of them, two bottles of champagne, no 16 food for days, half a bottle of whiskey, those 17 things, had that been all absolutely true, would 18 have not only caused a blackout, but it would have 19 caused a severe alcohol poisoning, overdose. I 20 would have had to have gone immediately -- if that 21 were true, I would have had to have been taken to 22 a hospital or just die.</p>

2303

1 So, you know, blackout is when someone
2 gets so drunk on alcohol, essentially on alcohol.
3 But the pills that I had, my addiction, that I was
4 addicted to, the Roxicodone, which are very, very
5 powerful opiates, two of those would knock me out.
6 That is to say, so there's blackout, which is you
7 can be -- a person can be wide awake and wreaking
8 havoc or having a giggle in a blackout and never
9 remember it. But when you go -- when you are --
10 when you're taking the prescription medication, it
11 knocks you out. You are certainly not -- well,
12 you're not in any condition to, first of all,
13 swing at anyone. You are out. You go on what's
14 called "the nod," and then it takes you away into
15 sleep. It's just very deep sleep. And I found
16 that much more accepting than having to hear
17 constant badgering and insults.
18 Q Mr. Depp, I'd like to show you
19 Defendant's Exhibit 153, which I believe
20 Mr. Rottenborn also showed you last week.
21 A Yes.
22 Q Do you remember seeing this during

2304

1 Mr. Rottenborn's examination of you last week?
2 A Yes. Yes, I do.
3 Q Now, I'd like to show you the full text
4 exchange which is in Plaintiff's Exhibit 120, and
5 since there have been a number of text messages
6 drawn from this document, this would be
7 Plaintiff's Exhibit 120C.
8 THE COURT: Which page would that be or
9 underscore?
10 MS. MEYERS: This would be 4 and 5,
11 Your Honor.
12 THE COURT: 4 and 5? Thank you.
13 Q Mr. Depp, do you recognize these text
14 messages?
15 A Yes, I do.
16 MS. MEYERS: Your Honor, I'd move
17 Plaintiff's 120C into evidence and ask that it be
18 published to the jury.
19 MR. ROTTENBORN: No objection, Your
20 Honor.
21 THE COURT: All right. 120C in
22 evidence and published.

2305

1 Q Mr. Depp, who are you communicating
2 with in these text messages?
3 A In fact, though it says "Merino," these
4 are texts between my ex, Vanessa Paradis, the
5 mother of my children, and this is, again abstract
6 humor that we're conveying back and forth to one
7 another. This was all -- it was a joke. It
8 wasn't about -- certainly wasn't about Ms. Heard.
9 We didn't speak of her much together.
10 Q Do you recall what you were talking
11 about?
12 A I don't recall who it was. I don't
13 recall who it was, but it was someone who had, for
14 some reason, I think it was -- oh. I think the
15 possibility is that -- 2013. It might have
16 been -- we had a nanny at one point who we, in
17 fact, we had -- we found her -- she was caught
18 stealing even from my, at the time, my -- yeah,
19 maybe 10-, 11-year-old boy, Jack, who was bright
20 enough, because he knew it, he was bright enough.
21 He had a \$5 bill that he wadded up and put on his
22 desk in his bedroom. And when he came home from

2306

1 school --
2 MR. ROTTENBORN: Your Honor, I'm just
3 going to object on relevance. The question was
4 who was this about.
5 MS. MEYERS: We can move on.
6 THE COURT: Okay.
7 Q Mr. Depp, I'd also like to show you
8 Exhibit 143, which I believe Mr. Rottenborn showed
9 you last week.
10 Do you remember seeing this email
11 exchange?
12 MS. MEYERS: If you could, scroll down
13 as well, please. Thank you.
14 A Oh, yes. Yes, yes.
15 Q Who are you exchanging these emails
16 with?
17 A Stephen Deuters, who was, at the time,
18 was my assistant.
19 Q And what are you and Mr. Deuters
20 discussing here?
21 A Gobbledygook, essentially. It was, as
22 I remember, it was a day of work, and there were

<p style="text-align: right;">2307</p> <p>1 times when I would send a text to Mr. Deuters. 2 Because he's the worrisome type, I would send him 3 a text in jest, of course, to get a rise out of 4 him, to get some reaction out of him. So, you 5 know, I would tell him things like, you know, "I 6 woke up, and I'm bleeding profusely from the 7 inside of my ear. Is that normal?" You know, it 8 would be things like that. 9 So this is exactly the same kind of 10 thing. I think we're even referencing The 11 Hangover, the film The Hangover in part of the 12 Mike Tyson meat and sort of bizarre circus that I 13 was telling him that I had in my room and that 14 there was blood everywhere. It was a joke to just 15 sort of throw him off where I am and make -- 16 ultimately, it was a joke and we were laughing 17 about it. 18 Q Mr. Depp, what, if any, portion of this 19 email exchange is literally true? 20 A "We're all set to leave here at 21 approximately 1:30 p.m. Hope you rested well." 22 Q Mr. Depp, I would like to talk to you</p>	<p style="text-align: right;">2309</p> <p>1 this out-of-control -- 2 MR. ROTTENBORN: Same objection, Your 3 Honor. What Ms. Heard's view of the monster was 4 is not for this witness to say. 5 Q Mr. Depp, how do you know how Ms. Heard 6 defined the word "monster"? 7 A She said the words to me. 8 Q And what words did she say, with 9 respect to the term "monster"? 10 A It was her go-to phrase, and it was the 11 go-to phrase for me being, again, you know, as has 12 been embellished and elaborated, the drug use or 13 the drink or the whatever. But the monster was, 14 for me, and, again, you start to think about these 15 things and you put it in your own head, what the 16 real context is. The monster was sobriety. The 17 monster was trying to be -- to be sober because I 18 was plagued by these requests to stop drinking. 19 But the monster could also be -- if 20 a -- if a conversation, if something starts as a 21 conversation, which would quickly ramp up to quite 22 an antagonizing argument, if I responded to her,</p>
<p style="text-align: right;">2308</p> <p>1 about some text messages that Mr. Rottenborn 2 showed you where you referred to "the monster," 3 and this is in context of in conversations that 4 don't include Ms. Heard. Do you remember seeing 5 some of those communications? 6 A Yes. 7 Q First, I would like to show you 8 Defendant's Exhibit 427, please, which is a text 9 message from you to Jerry Judge. 10 How are you using the term "monster" in 11 this context when you're communicating with 12 Mr. Judge? 13 A The monster, the monster could 14 essentially -- the monster, it could be two 15 separate things. The monster, in her eyes, was 16 my -- 17 MR. ROTTENBORN: Objection as to what 18 the monster was in Ms. Heard's eyes, Your Honor. 19 THE COURT: All right. I will sustain 20 as to her eyes, if you want to rephrase. 21 MS. MEYERS: Oh. 22 A The monster was defined by Ms. Heard as</p>	<p style="text-align: right;">2310</p> <p>1 if I took part in the verbal back-and-forth, where 2 people do in life, and of saying obscenities, 3 screaming obscenities at one another, or calling 4 them names, when it gets to that point, I mean, 5 the monster was just the -- for me, it was just 6 the guy who actually was dumb enough to continue 7 to take part in arguments that would ultimately 8 get nowhere. 9 So that is one of the reasons why I 10 would try to get away from Ms. Heard and not 11 participate in her debates and her -- the 12 knowledge that she wanted to express to me and 13 circular and painful insults that were just 14 constant. It was rapid-fire. 15 So I stopped participating in those. I 16 tried to walk away. I tried to go to another 17 room, even to the point of locking myself in rooms 18 so that she just could pound on the door and 19 scream. That was clearly -- I should have never 20 fallen for that or taken the bait to allow myself 21 to get into a conversation which led to an 22 argument which led to physical violence. It was</p>

<p style="text-align: right;">2311</p> <p>1 not going to be good, so I would -- I would just 2 walk away, which drove her through the roof. 3 Q But, Mr. Depp, why would you use the 4 term "monster" when communicating with people 5 other than Ms. Heard? 6 A Because I heard it all the time. I 7 mean, it was -- as I said, that was her go-to, 8 "the monster. The monster's here, the monster's 9 back. The monster." So I would refer to the 10 monster, again, in terms of with Elton, or with 11 friends, Patty Smith, the monster was -- like with 12 Elton, it was just the monster was, you know, "I 13 let the monster creep back in," or something. 14 That is sobriety. That's what I'm 15 telling him is I have failed, and I've had a drink 16 where I've been drinking, but my drinking, again, 17 was not to excess. It never went into blackouts 18 or anything of that nature. I was disappointed in 19 myself for not staying there. 20 Though when you are constantly in a 21 position to be harassed by your beloved other, 22 what else could I do? I wanted to be numb. I</p>	<p style="text-align: right;">2313</p> <p>1 and things like that, which is sort of a passion, 2 and I saw a book called Disco Bloodbath, and I 3 thought it was -- I thought it was a funny title. 4 I can't say that was necessarily referencing 5 anything other than I thought it was a funny 6 title, Disco Bloodbath. It sounded like a sort of 7 a bad slasher movie to me. So I said, "Just 8 thought you should know that there exists a book 9 titled Disco Bloodbath. That's all." 10 And then she said, "We need that book." 11 Then she asked me, "Is it about last Friday night 12 by any chance?" 13 And then my answer to her, "How can you 14 make me smile about such a hideous moment?" 15 The fact is, this is a lighthearted 16 exchange that she's even saying, "We need that 17 book." Then she makes reference to last Friday 18 night, which I don't recall what last Friday night 19 was or whatever, so I just -- "How can you make me 20 smile about such a hideous moment?" A hideous 21 moment could have been some grotesque thing that 22 we saw on television. It could have been</p>
<p style="text-align: right;">2312</p> <p>1 didn't want to hear that. I didn't want to feel 2 that, especially from one who had professed such 3 love for me but gave me mostly hatred. 4 MS. MEYERS: Your Honor, I'm about to 5 switch subjects, so if this would be a good time 6 for the lunch break... 7 THE COURT: All right. We started a 8 little later, so I don't mind going a little 9 further. If you want to do that, go ahead. 10 MS. MEYERS: Okay. 11 Q Mr. Depp, I'd like to show you 12 Defendant's Exhibit 161. I believe Mr. Rottenborn 13 showed you this last week and again today. 14 A Yes, he did. 15 Q Do you recognize these text messages as 16 between you and Ms. Heard? 17 A Yes, I do. Yes, I do. 18 Q Why are you informing Ms. Heard there's 19 a book called Disco Bloodbath? 20 A I -- when I texted her, 2:30 in the 21 afternoon, I was in a bookstore, a used bookstore 22 or a bookstore that had a lot of first editions</p>	<p style="text-align: right;">2314</p> <p>1 anything. I don't recall now. But all I was 2 saying is -- and it even says at the end of my 3 text, "That's all," Disco Bloodbath, you know. 4 So I -- this was not a -- we were not 5 butting heads in this exchange whatsoever. It was 6 very lighthearted. 7 Q Mr. Depp, I'd like to show you 8 Defendant's Exhibit 375, which is another document 9 Mr. Rottenborn showed you last week. 10 A Yes. 11 Q Could you please remind the jury what's 12 reflected in this photograph? 13 A This is from Australia on March 8th, I 14 believe it was, where, after my finger had been -- 15 the tip of my finger had been taken off, I began 16 to -- I was in such shock, I just started writing 17 on the mirror, on walls, and basically what these 18 were, for me to Ms. Heard, were reminders of 19 moments in our past where I had caught her, caught 20 her, where it was revealed to me even by her that 21 she had been caught in lies that she had told me. 22 So that's what these are in reference to. The</p>

<p style="text-align: right;">2315</p> <p>1 red, the lipstick that says, "Call Carly Simon. 2 She said it better, babe," in reference to "You're 3 So Vain," I'm imaging. But that's not -- I 4 didn't -- the Carly Simon message is not mine; 5 that's Ms. Heard's. 6 Q So let's just break this down a little 7 bit. 8 Who wrote the text that's in black on 9 the mirror? 10 A That would be me. 11 Q And what does that say? 12 A "She loves -- I don't, like, "naked 13 Hollywood or something. An artist of" -- I don't 14 know what the rest says, but what that is, is 15 Ms. Heard had come to me, and she was seriously -- 16 seemed to be seriously concerned about how she was 17 being portrayed in Hollywood. She was concerned 18 that because she had done films where there was 19 kind of arbitrary nudity and things of that 20 nature, she had voiced to me that she did not want 21 to be -- she didn't want to be looked upon that 22 way in the industry. She wanted to be able to</p>	<p style="text-align: right;">2317</p> <p>1 So I had experienced something similar 2 in terms of being looked upon as something that 3 you're not. And so I fought against it in the 4 very beginning, and it worked out for me, you 5 know, for a while there. And I was giving her 6 basically the same advice. 7 Q Now, Mr. Depp, you said that you did 8 not write this portion that's in red here that 9 says, "Carly Simon said it -- call Carly Simon; 10 she said it better, babe"; is that right? 11 A No, that's not mine. 12 Q How do you know that it was Ms. Heard 13 that wrote that? 14 MR. ROTTENBORN: Objection. Lack of 15 foundation. 16 THE COURT: Overruled. 17 You can answer. 18 A It's -- well, first, it doesn't -- 19 looks like it's trying to match my handwriting, 20 but my handwriting is a lot more of a scribble. 21 And also there's another photograph of this where 22 she went in to make sure that they were -- that</p>
<p style="text-align: right;">2316</p> <p>1 escape the chains of being objectified by the 2 Hollywood system, which is a difficult thing for 3 any woman, certainly, unfortunately. 4 But she asked me, "How can I -- how can 5 I avoid being stereotyped as the beautiful blonde 6 who gets her breasts out, goes naked, and has to 7 strip people in movies?" 8 And I gave her my advice on it, on how 9 to avoid it, which I thought it was pretty 10 accurate. And she -- her ambition was stronger 11 than what she received from my advice is what it 12 was, my advice that I thought long and hard about 13 because I did care for her and I did understand. 14 I didn't want her to have to do that. 15 And early on in my career, I was put in 16 a position where, you know, I could have gone 17 on -- I could have been just a guy who was on a TV 18 series for a couple of years, and then, you know, 19 what was going to be left of me was -- would be on 20 lunch boxes and Thermoses and posters and Teen 21 Idol things, and I fought that tooth and nail 22 because I didn't -- that's not who I was.</p>	<p style="text-align: right;">2318</p> <p>1 the red was more prominent. I believe there's 2 also a napkin down there where -- 3 MR. ROTTENBORN: Objection, Your Honor. 4 Lack of foundation. He's referring to exhibits 5 that aren't in evidence and has no idea whether 6 they even exist. 7 THE COURT: I'll sustain the objection 8 now. 9 Next question. 10 Q Was -- do you recall whether the 11 lipstick writing was on the mirror when you wrote 12 in the black paint? 13 A No, of course not. No. 14 Q Mr. Depp, I'd like to show you one of 15 the text messages that Mr. Rottenborn showed you 16 concerning the injury to your finger. 17 MS. MEYERS: So if we could, please 18 pull up Defendant's Exhibit 398. 19 Q This is a text message from you to 20 Dr. Kipper that I believe Mr. Rottenborn showed 21 you on cross-examination. 22 Do you remember that?</p>

<p style="text-align: right;">2319</p> <p>1 A Yes. 2 Q Okay. And why are you apologizing to 3 Dr. Kipper in this message? 4 A I believe that at that point in my 5 brain and in my life and in my heart, I was 6 completely and utterly frustrated with how I had 7 to – or how I was living my life. And I had had 8 some disagreement with Dr. Kipper, and I was – I 9 was apologizing to him for having gone against his 10 wishes – or gone against his advice, let's say. 11 Q What did you mean when you said, "I 12 have chopped off my left middle finger as a 13 reminder that I should never cut off -- cut my 14 right finger off again"? 15 A It's – again, it's my way of dealing 16 with – dealing with a painful situation. It's my 17 way of dealing with a painful situation where I 18 resort to humor. So I had lost the tip of my 19 right finger, and so I'm saying to him, "I've now 20 cut off my left finger to remind me never to cut 21 my right finger off again." That's not – I mean, 22 when you say, "I cut my finger or I got my finger</p>	<p style="text-align: right;">2321</p> <p>1 my mind was "Thank God it wasn't the left hand," 2 which is the fret hand. I'm right-handed, so 3 that's the fret – that's where the fret board is. 4 If you lose a finger from your left hand, you 5 know, I'm not Django Reinhardt who had only two 6 fingers to play with. If I had lost a finger from 7 here, I would have had to relearn how to play the 8 guitar all over again. 9 It's just not the case. Even though I 10 say, "I've chopped my finger off," it's like 11 saying, you know, "I bumped into a knife" or 12 something, you know. It's not – I'm not 13 admitting to – I think if I was going to admit to 14 someone that I actually chopped my finger off, 15 this text wouldn't be as it is. I think it would 16 have been a long explanation as to why I got to 17 that point. 18 But, no, I can't take responsibility 19 for what I now call "Little Richard," my chopped 20 finger. 21 Q Mr. Depp, at the time that you sent 22 this text message to Dr. Kipper, had you told him</p>
<p style="text-align: right;">2320</p> <p>1 cut off," or this or that, it doesn't necessarily 2 mean that you did it yourself. 3 And, again, I'm a guitarist and have 4 been since I was 12, and that was the only peace 5 that I found in my life at the age of 12, where I 6 knew what I – I knew who I could – that I could 7 escape into music and learn music. And the last 8 thing, I'm a guitar – I mean, I still play the 9 guitar. It's still my first love; aside from my 10 children, it's still my first love. There is no 11 reason in the world why I literally would cut my 12 own finger off to ruin this beautiful opportunity 13 that I was given at 12 to learn how to play the 14 guitar. And, again, why would I start lopping off 15 digits in my 50s if I, as Mr. Rottenborn suggests, 16 am a kind of a walking tantrum? 17 When I was younger, why wouldn't I just 18 start chopping off fingers and – or some kind 19 of – why would I ruin the only thing that was 20 really good in my life aside from my children? 21 So, when this finger went, the tip of 22 this finger went, the only thing I could think in</p>	<p style="text-align: right;">2322</p> <p>1 what had actually happened to your right finger? 2 A Oh, yes. Yeah. Oops. 3 Q And when did you tell him that? 4 A He was aware of that, that day, the day 5 that it happened. Malcolm was aware it. Jerry 6 was aware of it. Stephen was -- everyone was 7 aware of it. And of course, yes, when I went to 8 the doctor, the emergency room, I lied to them 9 because I didn't -- I didn't -- I didn't think it 10 wise to cause a ruckus, implicate Ms. Heard, and 11 then have eight million stories out in the press 12 about how she'd thrown a bottle of vodka at my -- 13 at me and it smashed the -- all the bones in the 14 tip of my finger and cut off about -- well, it was 15 all sliced down through -- you've seen the 16 pictures. It was pretty horrible. 17 It was -- and I didn't want to -- I 18 didn't want to put her in that situation. I 19 didn't want to put any of us in that situation. I 20 didn't want to put the film in that situation. 21 That was why I said it was crushed in an accordion 22 door, and it was only the second doctor who had --</p>

2323	<p>1 who actually told me what he – 2 MR. ROTTENBORN: Objection, Your Honor. 3 Hearsay. 4 THE WITNESS: I haven't finished my 5 sentence. How do you know? 6 THE COURT: I'll overrule. Go ahead. 7 THE WITNESS: Should I -- thank you. 8 A The emergency room doctor was the 9 first. The next day I went to see a specialist, 10 hand surgeon, and this was still in Australia, and 11 he had recognized that my excuse for the finger 12 being gone – 13 MR. ROTTENBORN: Objection, Your Honor. 14 Hearsay. What the doctor conveyed to him about 15 his thoughts on the finger injury, that's classic 16 hearsay. 17 MS. MEYERS: Your Honor, it's in the 18 context of medical treatment. 19 THE COURT: I'll sustain that 20 objection. 21 MS. MEYERS: Okay. Your Honor, I think 22 this is a good stopping point.</p>	2325	<p>1 That goes for all the remote witnesses when we get 2 to them, okay? Thank you. Bailiff. 3 MR. CHEW: Thank you. 4 THE BAILIFF: All rise. 5 (Recess taken from 1:16 p.m. to 6 2:20 p.m.) 7 THE BAILIFF: All rise. Please be 8 seated and come to order. 9 THE COURT: Are we ready for the jury? 10 MS. BREDEHOFT: Your Honor, may we 11 approach? 12 THE COURT: Yes, ma'am. 13 (Sidebar.) 14 MS. BREDEHOFT: Your Honor, today, the 15 audience has been much more rowdy. 16 THE COURT: I'm trying. Yeah, yeah. 17 MS. BREDEHOFT: And I know Your Honor 18 has. But they've been -- perhaps Your Honor can 19 say something in addition to it. Explaining to 20 them a little bit, and I think they can be 21 admonished too. 22 THE COURT: Well, if I could get -- I</p>
2324	<p>1 THE COURT: All right. Ladies and 2 gentlemen, we'll go ahead and take our hour lunch 3 recess. Again, do not do any outside discussions, 4 and don't talk to each other about it, okay? 5 We'll see you after lunch, okay? 6 If everybody in the courtroom could be 7 quiet, please. Court is in session. Thank you. 8 (Whereupon, the jury exited the 9 courtroom and the following proceedings took 10 place.) 11 THE COURT: All right. So we can take 12 a recess until 2:20. 13 Just for planning purposes, though, I 14 plan to go until 5:30 today, since we had a late 15 start. So just to let you know. I know you plan 16 to have a remote witness which is fine, just let 17 us know so we can set that up. Also let your 18 remote witness know this is a courtroom. I don't 19 expect there to be any outside noises or anything 20 else going on and direct attention, and also if 21 they would know that if there's an objection, for 22 them to hold off answering until it's resolved.</p>	2326	<p>1 was waiting for objections, honestly. I'm not 2 going to -- 3 MS. BREDEHOFT: Oh, is that what -- 4 that's what we should do? We weren't what to do 5 with that. 6 MR. ROTTENBORN: And I'm just kind of 7 letting you know, that, you know, every time -- 8 THE COURT: And sometimes that's trial 9 strategy, so I don't want to say anything. I 10 don't want to interject myself in either one of 11 your cases unless you object to something, except 12 if it gets too loud. 13 MS. BREDEHOFT: And I know that it has 14 impacted the jury also, they laugh when they 15 laugh. 16 THE COURT: Right, right. Yeah, I'm 17 not going to say -- I think they got it. I'll do 18 it again if I think there's an issue. 19 MS. BREDEHOFT: Okay. 20 MR. CHEW: Yeah, I don't think he's 21 planned anything distracting. 22 THE COURT: I don't know. I mean, he</p>

2327	1 has had some comments that I -- if there was an 2 objection, I would have addressed it. 3 MS. BREDEHOFT: Okay. Thank you, Your 4 Honor. 5 THE COURT: Okay. 6 MR. CHEW: Thank you, Your Honor. 7 (Open court.) 8 THE COURT: All right. Are we ready 9 for the jury, then? 10 MS. MEYERS: Yes. 11 THE COURT: Okay. All right. 12 (Whereupon, the jury entered the 13 courtroom and the following proceedings took 14 place.) 15 THE COURT: Thank you. Be seated. 16 Your next question. 17 BY MS. MEYERS: 18 Q Mr. Depp, before the break, we were 19 talking about your -- how your finger got injured 20 in Australia. 21 Do you remember that? 22 A Yes.	2329	1 me. 2 Q And, in the middle, here, it says "Her 3 obsession with herself is far more important. 4 She's so fucking ambitious, she's so desperate for 5 success and fame, that's probably why I was 6 acquired, mate." 7 What did you mean by that? 8 A Unfortunately, I meant exactly -- I 9 meant exactly what I said in this text. It 10 seems -- it had become clear they were -- she 11 seemed to take more care and importance in going 12 to auditions, getting -- going to the Met Ball or 13 going to any sort of premiere or opening, or 14 whatever, where she could be. 15 MR. ROTTENBORN: Objection. Beyond the 16 scope of the question, Your Honor. 17 THE COURT: All right. 18 MS. MEYERS: I believe he was 19 responding to what he meant by what he wrote in 20 his text message. 21 MR. ROTTENBORN: Then he said exactly 22 what the words said, and now he's going beyond
2328	1 Q Okay. 2 MS. MEYERS: I'd like to pull up 3 Defendant's Exhibit 394, please. 4 Q Mr. Depp, do you recall Mr. Rottenborn 5 showing you this exhibit during your 6 cross-examination? 7 A Yes, I do. 8 Q And can you please explain when, 9 relative to your finger injury, you sent this text 10 message? 11 A That's the day before. 12 Am I correct? 13 Q At the bottom, it says "I cut the top 14 of my finger off, what should I do, except, of 15 course, go to a hospital?" 16 A Ah, Australia, exactly. Big time 17 difference. 18 Yes, that's what I said. 19 Q And so when, relative to when your 20 finger was injured, did you send this text 21 message, to your best recollection? 22 A This looks like it's at the time, to	2330	1 what the text said. 2 THE COURT: All right. I'll sustain 3 the objection. 4 Next question. 5 THE WITNESS: Thank you, 6 Mr. Rottenborn. 7 MR. ROTTENBORN: Your Honor. 8 THE COURT: Just answer the questions, 9 please. Direct your attention just to your 10 attorney, okay? 11 THE WITNESS: Sorry, Your Honor. 12 Q Mr. Depp, last week, Mr. Rottenborn 13 showed you an audio recording where you referenced 14 your finger getting cut off in Australia. 15 Do you recall that? 16 A Yes. 17 Q Okay. I would like to play a different 18 portion of that recording that came before the 19 portion that Mr. Rottenborn played. 20 MS. MEYERS: So if we could, please, 21 pull up Plaintiff's Exhibit 343, and we will be 22 playing the portion from at one hour, 54 minutes,

<p style="text-align: right;">2331</p> <p>1 11 seconds, to one hour, 56 minutes, 10 seconds. 2 (Whereupon, the following audio was 3 played.) 4 MS. HEARD: It's early. It's quick. 5 It's so not -- you're not interested in not 6 hitting. You're guaranteeing a fight when you do 7 that, and I've told you this so many times. You 8 guarantee it. If you were interested in not 9 fighting, you would be respectful, if you needed 10 the space, to make -- you would be careful not to 11 perpetuate the fight longer by saying I need a few 12 minutes, and then actually honoring that. 13 How can I trust you that it will be a 14 few minutes when you've done this in the past and 15 disappeared for hours? You know, I got mad at you 16 in Australia about this. I said, baby, I want to 17 trust you. It's hard for me not to try and work 18 it out. If you want to be the person that's like, 19 I need to cool down. Help me do that -- give that 20 to you. But I can't give it to you if you always 21 let me down and fuck up and forget it. 22 MR. DEPP: Because I gave you a time</p>	<p style="text-align: right;">2333</p> <p>1 arguments. 2 MR. DEPP: Yes, and our -- 3 MS. HEARD: Earlier and earlier and 4 earlier now you split. You take off right away. 5 You don't deal with the issue. You don't deal 6 with the confrontation. And you split. Whether 7 it is -- and then you do it for an undeterminate 8 amount of time. You do it without actually 9 respecting me. When you give me a time, like, 10 say, I need a few minutes, you never -- 11 BY MR. ROTTENBORN: 12 Q Mr. Depp, whose voices can you hear in 13 that audio recording? 14 A Ms. Heard's and myself. 15 Q And there was a mention about Ms. Heard 16 getting mad about something in Australia? 17 What did Ms. Heard get mad at you about 18 in Australia? 19 A There were -- there were many, many 20 instances where Ms. Heard would get upset, angry, 21 and argumentative and violent in Australia. There 22 were many times.</p>
<p style="text-align: right;">2332</p> <p>1 limit. Because I said I'll be back in a three 2 minutes. So I'm just -- 3 MS. HEARD: No, it's different. 4 MR. DEPP: If it happens -- 5 MS. HEARD: It's different. You 6 never -- 7 MR. DEPP: If it happens, I'm just 8 going to say, look, I need some time. That's it. 9 MS. HEARD: I'm telling you, that will 10 make it worse. 11 MR. DEPP: No. 12 MS. HEARD: I guarantee you it will. 13 MR. DEPP: In you're fucking throwing 14 punches, it's -- 15 MS. HEARD: I'm not talking about 16 throwing punches. I'm talking about an argument. 17 MR. DEPP: Right. In arguments, you 18 tend to throw punches. 19 MS. HEARD: I'm talking about 20 arguments. I'm not talking about the times when 21 it's got physical. I'm talking about arguments. 22 I'm talking about arguments. I'm talking about</p>	<p style="text-align: right;">2334</p> <p>1 I -- the one that was the day when my 2 finger, tip of my finger disappeared, that had to 3 do with a phone call. When she arrived in 4 Australia, she'd complained that an attorney, who 5 was explaining to her the -- 6 MR. ROTTENBORN: Objection, Your Honor. 7 It's hearsay as to what he alleges her attorney 8 was explaining to her. 9 MS. MEYERS: We can move on, Your 10 Honor. 11 THE COURT: Okay. Yes, ma'am. 12 Q In the context of this audio recording 13 that we just heard, what, to your recollection, is 14 Ms. Heard referencing when she said you split? 15 A I would -- I would excuse myself from 16 the situation. I would try to get away so that -- 17 so that nothing escalated. Because if given the 18 chance to allow things to escalate, Ms. Heard 19 would take it to the very extreme, which ended up 20 with my finger being chopped off. 21 So I rather thought it was a best idea 22 to avoid things like that.</p>

<p style="text-align: right;">2335</p> <p>1 Q Mr. Depp, I'd like to show you what's 2 been marked as Defendant's Exhibit 272, I believe 3 this is another document that you saw during your 4 cross-examination. 5 Do you recognize these text messages? 6 A Yes. 7 Q And these were after your detox on the 8 island; is that right? 9 A That's correct. 10 Q Now, where it says here "this was the 11 right thing to do to speed up the process," what 12 are you referring to there? 13 A I -- when we were on the island and I 14 was going through the process of detox, the 15 detoxing from the opiates, which was a very 16 unpleasant and powerful, painful, process, it 17 wasn't working with Ms. Heard there. I could not 18 properly detox, as every day was a -- another 19 problem or this or that. 20 So, I asked we leave the island and go 21 back to Los Angeles. And I asked Ms. Heard if she 22 would, please, allow me to get a bungalow at the</p>	<p style="text-align: right;">2337</p> <p>1 video? 2 A That's the kitchen at a house that I -- 3 on Sweetzer, that I've lived in for -- since mid 4 '90s. 5 Q And do you recall what you were upset 6 about in that video? 7 MR. ROTTENBORN: Objection. Leading. 8 THE COURT: Overruled. 9 A I don't recall, as I don't know the 10 date of -- there's no metadata, that I am aware 11 of, for that tape. Also, apparently, looking for 12 any metadata is impossible, as it is not owned 13 by -- 14 MR. ROTTENBORN: Your Honor -- 15 THE COURT: I'll sustain the objection. 16 Do you want to ask the question again? 17 Q Mr. Depp, what, if anything, do you 18 remember being upset about that resulted in what 19 was seen in that video? 20 A I can't recall if it was bad news about 21 my mother's health. I can't recall if it was 22 something to do with my former business</p>
<p style="text-align: right;">2336</p> <p>1 Beverly Hills Hotel, where she and her friends 2 could go for, I needed five days, six days, 3 seven days, anything I could get, where I could 4 finish the detox by myself without any unnecessary 5 interruptions or unpleasant interruptions, to 6 which she replied that she was -- felt like I was 7 throwing her out and abandoning her after all she 8 had done for me. When the fact is, no matter what 9 I wrote to her mother and to her, I needed the 10 time because she -- I would have gone straight 11 back to the pills. I would have not been able to 12 detox properly without that time alone. And she 13 reluctantly gave me the time and I sent her and 14 her friends to Beverly Hills Hotel and a bungalow 15 and went through the detox by myself in penthouse 16 3 for the next five or six days. 17 Q Mr. Depp, last week, Mr. Rottenborn 18 showed you a video that was taken of yourself 19 where you're slamming some cabinets. 20 Do you recall that? 21 A Yes, I do. 22 Q First of all, where are you in that</p>	<p style="text-align: right;">2338</p> <p>1 managers -- you know, finding out that they'd 2 taken me for a very nasty ride. 3 I don't recall exactly what it was 4 about. What I do know is that it didn't have 5 anything to do with her. 6 MR. ROTTENBORN: Objection. Beyond the 7 scope of the question. 8 THE COURT: Overruled. I'll allow it. 9 It's fine. 10 A There was nothing between us before she 11 entered that room. It was me alone. 12 Q Okay. Do you know where Ms. Heard was 13 before she entered the room? 14 A I assume that she was up in the, you 15 know, she'd gotten out of bed and gotten dressed 16 and come down the stairs. 17 Q Mr. Depp, earlier today, Mr. Rottenborn 18 played a recording where you can hear Ms. Heard 19 seeming to claim that you put a cigarette out on 20 her. 21 Do you remember that? 22 A I remember hearing that, yes.</p>

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<p>1 Q I'd like to play you another recording, 2 which is Plaintiff's Exhibit 365. 3 A Okay. 4 MS. MEYERS: And this is, for the 5 record, an 11-second recording, so we'll be 6 putting in the entire. 7 THE COURT: All right. Any objection 8 to 365? 9 MR. ROTTENBORN: No, Your Honor. 10 THE COURT: All right. 365 in 11 evidence. 12 (Whereupon, the following audio was 13 played.) 14 MS. HEARD: Couch. Couch. Couch. You 15 give me one couch. I gave you three other 16 couches. Two? Two couches. What do you want, 17 please? 18 MR. DEPP: You don't pay attention to 19 it. 20 MS. HEARD: Please, give me couch. 21 MR. DEPP: What do you want? 22 MS. HEARD: Couch.</p>	<p>1 MR. ROTTENBORN: Stop. 2 MS. MEYERS: I'm sorry; I think I 3 misspoke. It may have been 45. I may have 4 switched around -- 5 MR. ROTTENBORN: She said it was 6 11 seconds long and that one was way longer. 7 MS. MEYERS: I apologize. I just 8 remembered. 9 MR. ROTTENBORN: It may help if -- can 10 we ask them to move the media player so we could 11 see it too. We can't tell with the blank screen, 12 so... 13 THE COURT: Probably just because we 14 didn't publish it. There you go. 15 Okay. 16 MS. MEYERS: Can we play that? Thank 17 you. 18 (Whereupon, the following audio was 19 played.) 20 MS. HEARD: Couch. Couch. Couch. You 21 give me one couch. I gave you three other 22 couches. Two? Two couches. What do you want,</p>
2340	2342
<p>1 MR. DEPP: Couch. Fine. What do you 2 want? 3 MS. HEARD: I want couch. 4 MR. DEPP: We don't have to take one. 5 MS. HEARD: I want couch. 6 MR. DEPP: Couch. 7 MS. HEARD: Agree, please. So -- you 8 said you agreed before -- 9 MR. DEPP: Couch. Agreed. 10 MS. HEARD: -- and then you started 11 talking. 12 It was self-fighting. 13 MR. DEPP: Have I been fighting? 14 MS. HEARD: Yes. Everything you've 15 said -- 16 MR. ROTTENBORN: Your Honor, she said 17 this was 11 seconds. 18 MS. HEARD: -- has been nasty and 19 provoking and mean-spirited -- 20 MR. DEPP: Not yours, though? 21 MS. HEARD: No, I'm not saying that. 22 You asked --</p>	<p>1 please? 2 MR. DEPP: You don't pay attention to 3 it. 4 MS. HEARD: Please, give me couch. 5 MR. DEPP: What do you want? 6 MS. HEARD: Couch. 7 MR. DEPP: Couch. Fine. What do you 8 want? 9 MS. HEARD: I want couch. 10 MR. DEPP: We don't have to take one. 11 MS. HEARD: I want couch. 12 MR. DEPP: Couch. 13 MS. HEARD: Agree, please. So -- you 14 said you agreed before -- 15 MR. DEPP: Couch. Agreed. 16 MS. HEARD: -- and then you started 17 talking. 18 It was self-fighting. 19 MR. DEPP: Have I been fighting? 20 MS. HEARD: Yes. Everything you've 21 said has been nasty and provoking and 22 mean-spirited --</p>

<p>2343</p> <p>1 MR. DEPP: Not yours, though? 2 MS. HEARD: No, I'm not saying that. 3 You asked me yours. 4 By the way, you just threw a fucking 5 cigarette on me. 6 BY MS. MEYERS: 7 Q Mr. Depp, do you recognize what's in 8 that recording. 9 A Do I recognize what's in the recording? 10 Q Yes. 11 A Seems pretty clear that she's ordering 12 me to the couch, and I didn't want to go through 13 with any – again, avoiding confrontation, trying 14 to avoid confrontation in any way. I can 15 certainly say that, without hesitation, there's no 16 way, under the sun, that I would flick a cigarette 17 at her or burn her with a cigarette. If I flicked 18 ashes and an ash got on her, but she's certainly 19 not screaming out in pain as if a cigarette is 20 being put out on her. That's ludicrous. 21 Q Do you recall the situation that's 22 reflected in that audio recording?</p>	<p>2345</p> <p>1 providing context for -- 2 THE COURT: We can go to the 22nd. 3 That's fine. 4 Q If you could, Mr. Depp, please, explain 5 where you were on the 22nd of May in 2016. 6 A As far as I can remember, on May 22nd, 7 2016, I was preparing -- I was preparing to leave 8 for New York for rehearsals and then a tour with 9 the Hollywood Vampires. I was either preparing to 10 leave or I had left. 11 MS. MEYERS: Could we, please, pull up 12 Defendant's Exhibit 736, please. 13 Q Do you recall sending this text message 14 to Ms. Heard on May 22nd, 2016, at 6:19 p.m.? 15 A Yes, I do. 16 Q Okay. What did you mean when you told 17 her "nothing I have to say to you should elicit 18 anything but a sense of ease"? 19 A It was essentially, for me, I was 20 bringing up what I had spoken to her about before, 21 which was a peaceful resolution to the problems. 22 A peaceful resolution in terms of a peaceful and</p>
<p>2344</p> <p>1 A I believe that's Montreal – excuse me, 2 Toronto, which was right after the Venice Film 3 Festival. We were at the Toronto Film Festival. 4 Q Mr. Depp, I would like to ask you about 5 a couple of text messages from May 22nd, 2016, 6 that Mr. Rottenborn asked you about earlier. 7 A Yes. 8 Q And before I do, could you, please, 9 remind the jury what was going on between you and 10 Ms. Heard's -- between you and Ms. Heard on 11 May 22nd, 2016? 12 A On May 22nd? On May 21st, I had -- she 13 wanted -- I hadn't seen her since the 22nd of 14 April, her birthday, which was when I left at 4:30 15 in the morning. 16 MR. ROTTENBORN: Objection. Your 17 Honor. This is cumulative. He's already gone 18 through all of this in his direct examination and 19 she asked him what was happening on May 22nd, and 20 he's getting into what happened on May 21st. 21 We've already been through this. 22 MS. MEYERS: I believe that he's</p>	<p>2346</p> <p>1 private and quiet and calm divorce. And so, 2 that's why I say it shouldn't elicit anything but 3 a sense of ease because it was not about -- I 4 didn't want to argue. I didn't want anything but 5 to end the marriage in the kindest way possible 6 for all her family, my family, her, myself, et 7 cetera. 8 Q And what did you mean when you said 9 "all my love and profound apologies"? 10 A "Profound apologies" is that it just 11 didn't work. We just could not work. There was 12 no way. And I had to try to put a peaceful end -- 13 peaceful stop to the endless -- endless 14 opportunities for these constant arguments. 15 If I didn't put a stop to it, then -- I 16 mean, if I didn't try to put a peaceful stop to 17 it, peaceful end to it, then if you don't stop it 18 yourself, it'll stop you. It'll stop you, and you 19 don't know what that could be. But it's -- it was 20 horrific, and I wanted her out of it and I wanted 21 out of it. No one deserves to live like that. No 22 one deserves to live like that, not her, not me,</p>

2347	<p>1 not anyone.</p> <p>2 So, I just wanted a smooth exit for</p> <p>3 both of us. That's all I was looking for.</p> <p>4 Q Mr. Depp, last week, Mr. Rottenborn</p> <p>5 played a clip from an audio recording where</p> <p>6 Ms. Heard told you that you vomit in your sleep a</p> <p>7 lot.</p> <p>8 Do you remember that recording?</p> <p>9 A Yes, I do.</p> <p>10 Q And what's your response to that?</p> <p>11 A When someone tells you that you vomit,</p> <p>12 she didn't tell me. I heard it in court. When</p> <p>13 someone brings up the fact that you vomit in your</p> <p>14 sleep every night, and – well, first, I think</p> <p>15 you'd be aware of it. And, also, I think the</p> <p>16 first thing that I would do is seek medical</p> <p>17 attention. Didn't exist. I never vomited in my</p> <p>18 sleep every night.</p> <p>19 There were times when I would get, yes,</p> <p>20 physically ill from the endless shots that you</p> <p>21 take when you're just – you're unable to take any</p> <p>22 more. And it does affect you physically after a</p>	2349	<p>1 342, just the entire audio in?</p> <p>2 MS. MEYERS: Yes. I don't believe that</p> <p>3 there's anyone else in this audio recording, Your</p> <p>4 Honor.</p> <p>5 THE COURT: I don't believe. I heard</p> <p>6 this before. Okay.</p> <p>7 342. Any objection?</p> <p>8 MR. ROTTENBORN: As long as there's no</p> <p>9 one else in the audio recording, no objection.</p> <p>10 MS. MEYERS: We can confirm afterwards.</p> <p>11 If Your Honor is more comfortable, we can put it</p> <p>12 in as 342A.</p> <p>13 THE COURT: Okay. Let's put 342A. I'm</p> <p>14 sorry, what's the part that you're going to play?</p> <p>15 MS. MEYERS: It's 19 minutes,</p> <p>16 40 seconds to 25 minutes, 25 seconds.</p> <p>17 THE COURT: And it's just the two of</p> <p>18 them in this excerpt?</p> <p>19 MS. MEYERS: That's correct.</p> <p>20 THE COURT: 342A in evidence, then.</p> <p>21 Thank you.</p> <p>22 (Whereupon, the following audio was</p>
2348	<p>1 while.</p> <p>2 So, I would have to leave and go and</p> <p>3 vomit when fights got into these surreal and</p> <p>4 absurd and horrible places.</p> <p>5 But, it still confounds me as to why</p> <p>6 she would record that. I don't know why anyone</p> <p>7 would record that.</p> <p>8 Q Mr. Depp, the portion, the clip that</p> <p>9 Mr. Rottenborn played was from Defendant's</p> <p>10 Exhibit 839.</p> <p>11 MS. MEYERS: And just for the record,</p> <p>12 this is a portion of a larger recording which is</p> <p>13 reflected in Plaintiff's Exhibit 342. So, with</p> <p>14 the Court's permission, I would like to play a</p> <p>15 clip from Plaintiff's Exhibit 342 and the -- we're</p> <p>16 at -- the portion I'd like to play is at</p> <p>17 19 minutes, 40 seconds to 25 minutes, 25 seconds.</p> <p>18 THE COURT: All right. Do we have 342</p> <p>19 already in evidence?</p> <p>20 MS. MEYERS: I don't believe so, Your</p> <p>21 Honor.</p> <p>22 THE COURT: No? So you want to put</p>	2350	<p>1 played.)</p> <p>2 MR. DEPP: I don't care.</p> <p>3 MS. HEARD: Do you understand why</p> <p>4 ten minutes sounds seriously --</p> <p>5 MR. DEPP: I don't care.</p> <p>6 MS. HEARD: -- doesn't seem real?</p> <p>7 MR. DEPP: I don't care.</p> <p>8 MS. HEARD: Did you hear what I said?</p> <p>9 MR. DEPP: I don't care. I don't care.</p> <p>10 MS. HEARD: You do care.</p> <p>11 MR. DEPP: There's plenty of things</p> <p>12 you've done, plenty of things you've fucking done</p> <p>13 that were absolute fucking lies.</p> <p>14 MS. HEARD: I didn't ever --</p> <p>15 MR. DEPP: And I didn't fuck with you</p> <p>16 about it.</p> <p>17 So, anyway, I'm leaving. So, I'll see</p> <p>18 you in a bit, yeah?</p> <p>19 MS. HEARD: Is that what matters?</p> <p>20 MR. DEPP: Your lies?</p> <p>21 MS. HEARD: Is this what matters to</p> <p>22 you, your party?</p>

2351	1 MR. DEPP: Your lies matter to me. 2 MS. HEARD: I never lie to you. And 3 what we're talking about tonight is what? 4 Who are you? Why? Why are you doing 5 this? 6 MR. DEPP: I'm leaving. I'll be back. 7 MS. HEARD: Why? 8 MR. DEPP: Because I'm leaving. 9 MS. HEARD: What is it that is so 10 important, always, to run away to? Why? 11 MR. DEPP: To run away, yeah. I run 12 because I'm a coward. 13 MS. HEARD: Why don't you stay? I -- 14 you asked me once not to leave, and I'm asking 15 you. So why every five seconds do I get I'm 16 leaving because there's a fucking movie party I've 17 got to go to? I have never prioritized you behind 18 that. And you, of all people, of all people, all 19 this talk about not being that guy, you have done 20 nothing but -- over the last two days, but tell me 21 that your movie parties were more important, 22 including the night before last, when I said to	2353	1 MR. DEPP: Yeah. Yeah. For you, from 2 all this bitching, from all this -- these rules. 3 All these -- 4 MS. HEARD: Rules? Because I asked you 5 to stay? 6 MR. DEPP: Because you -- 7 MS. HEARD: Because I asked you to 8 stay? 9 MR. DEPP: No, because you're fucking 10 barking. 11 MS. HEARD: What was it when you asked 12 me to stay? 13 MR. DEPP: Because you're a pain in the 14 ass. 15 MS. HEARD: What was it when you asked 16 me to stay? 17 MR. DEPP: I can't stand it no more. 18 MS. HEARD: What was it when you asked 19 me to stay? In Australia, you said you promise me 20 not to leave. You said you promise me not to 21 leave. What did I do? 22 MR. DEPP: I thought you would change.
2352	1 you the same thing. Stay. And today, you 2 apologize. You said, I love you, I'm so sorry. 3 And then today, it takes you two seconds. It 4 takes you 20 seconds, at most, to go, fuck that. 5 I hate you. I don't want to be with you. 6 Good-bye. I'm leaving. I'm running away. But 7 I'm not running, I'm walking away. 8 MR. DEPP: Well, one thing is for sure, 9 I don't want to be with you. I don't. I really 10 don't. 11 MS. HEARD: Then if you don't want to 12 be with me in life -- 13 MR. DEPP: Good-bye. 14 MS. HEARD: -- then you need to 15 actually do it. You need to actually take off 16 your ring and forget that five hours ago you said 17 the opposite. Otherwise, you can't keep throwing 18 that around. You can't keep saying to me that 19 this is something you care about. 20 MR. DEPP: There you go. 21 MS. HEARD: Is that what it's worth to 22 you?	2354	1 MS. HEARD: What did I do? 2 MR. DEPP: Not change. 3 MS. HEARD: What did I do? Did I stay 4 or did I leave? 5 MR. DEPP: You changed -- you -- 6 MS. HEARD: Did I stay or did I leave? 7 MR. DEPP: You stayed and you didn't 8 change, and you were a fucking pain in the ass and 9 you were a cunt. 10 MS. HEARD: So I stayed. And I've been 11 a cunt ever since. Which is why you told me, 12 about every other day, how you couldn't imagine 13 your life without me, including today. So 14 which -- 15 MR. DEPP: When you're -- 16 MS. HEARD: Does that seem normal to 17 you? 18 MR. DEPP: When you're -- 19 MS. HEARD: Does that seem normal to 20 you? You told me tonight -- 21 MR. DEPP: Let me -- 22 MS. HEARD: -- that you couldn't

2355	1 imagine your life without me. And now you're 2 throwing your ring on the ground. Does that seem 3 normal? 4 MR. DEPP: Let's have you tell me your 5 (indiscernible). 6 MS. HEARD: Does that seem sober? Do 7 you seem normal? 8 MR. DEPP: Give me the definition of 9 normal, you. You. 10 MS. HEARD: Does that seem normal? 11 MR. DEPP: You. 12 MS. HEARD: Does that seem normal to 13 you? 14 MR. DEPP: Borderline personality 15 disorder. 16 MS. HEARD: I'm borderline personality 17 disorder now? 18 MR. DEPP: Without a question. 19 MS. HEARD: When I've been consistent 20 all night saying, don't go, don't fuck this all 21 up. I'm not fighting with you anymore. 22 I've been saying this to you the whole	2357	1 MS. HEARD: I love you. 2 MR. DEPP: You wanna smack my ear 3 again. So it fuckin' resounds in my fuckin' 4 cranium. 5 MS. HEARD: I love you. 6 MR. DEPP: Would you like that? 7 MS. HEARD: I love you. 8 MR. DEPP: Huh? 9 MS. HEARD: I'm sorry. I'm sorry. I 10 love you. I love you. 11 MR. DEPP: I love you too. No, no. I 12 don't love you that much. 13 MS. HEARD: You do love me. 14 MR. DEPP: No, I don't. I do not love 15 you that much to give up myself. No. I do not. 16 I will not give up myself. And you want me to 17 fuckin' be some kind perched goddamn parrot or a 18 fucking weird frenzy dog. No, I won't be it. 19 MS. HEARD: I don't want you to be a 20 frenzy dog. I'm trying to talk to the -- 21 MR. DEPP: Or your goddamn -- 22 MS. HEARD: Oooh.
2356	1 night. I'm really sorry we disagreed. You're not 2 perfect. I said this two hours ago. I'm not 3 perfect. You're not perfect. 4 MR. DEPP: I love you. You put me 5 first. 6 MS. HEARD: But we don't have to do 7 this every time we disagree. 8 MR. DEPP: No. No, we don't, but we 9 do. But we do. 10 MS. HEARD: Please. Please. Come 11 here. Please come here. 12 MR. DEPP: And you have every insult in 13 the world. 14 MS. HEARD: Please come here. I am not 15 insulting you. I have not been insulting you. I 16 love you. 17 MR. DEPP: And you smacked me on the 18 ear. 19 MS. HEARD: Johnny, what do you mean 20 you do? I love you. Stop. 21 MR. DEPP: You gonna smack me on the 22 ear again.	2358	1 MR. DEPP: -- fucking lover. 2 MS. HEARD: Calm down. Calm down. 3 MR. DEPP: Fascia Fantasia. 4 MS. HEARD: Calm down. 5 MR. DEPP: I'm not going to be that 6 shit, man. 7 MS. HEARD: Baby, stop. 8 MR. DEPP: No, I don't want to be with 9 you. 10 MS. HEARD: Stop baby. 11 MR. DEPP: These are the fucking rules. 12 Fucked up. 13 MS. HEARD: No rules. You're making 14 this whole thing. You're doing this whole thing. 15 MR. DEPP: I want to get out of here. 16 MS. HEARD: No one's fighting you. 17 MR. DEPP: I'm making this up? That, 18 above all else, is an insult. 19 BY MS. MEYERS: 20 Q Mr. Depp, what are you and Ms. Heard 21 discussing in this recording? 22 A It is a -- another argument that is

<p style="text-align: right;">2359</p> <p>1 apparently not an argument to her. The screeching 2 of her voice, the demand that things go her way 3 and only her way. I was done. And I think I 4 stated clearly, I don't want to be with you. I 5 don't want to be with you. I'm not going to be a 6 parrot on a -- or some, you know, little dog that 7 runs through hoops for you. I ain't going to do 8 that. And I wanted out. She said, take your ring 9 out. She still wouldn't let me leave. I did, and 10 she still wouldn't let me leave. 11 So, it's just another example of kind 12 of being nailed in one spot, not allowed to do 13 anything but react to her screaming and -- 14 screaming like a banshee and then telling me to 15 calm down when I had been pretty calm, I thought. 16 Q Where were you trying to go, if you can 17 recall? 18 A Anywhere. Away. 19 Q And why did you ask Ms. Heard if she 20 wanted to smack you in the ear again? 21 A She had given me a good chop in the 22 ear, you know, one of those where it leaves you</p>	<p style="text-align: right;">2361</p> <p>1 the second portion, which is 56 minutes, 2 27 seconds to 59 minutes, 54 seconds. 3 THE COURT: Okay. All right. 598C in 4 evidence. 5 (Whereupon, the following audio was 6 played.) 7 MS. HEARD: It's a joke, right? Like, 8 you build, I build, you know. It isn't like a one 9 moment either of us signed a certificate saying or 10 signed a contract, oh, okay, now a bloodbath. No. 11 So acting as though there's a choice between the 12 two is irrelevant. 13 I'm not asking you to stay over having 14 a bloodbath. I'm asking -- I mean, over walking 15 away. I'm not asking you to have a bloodbath over 16 walking away. I'm asking you to work it out over 17 prolonging it to making it bigger. 18 MR. DEPP: Right. But if -- 19 MS. HEARD: I mean, at least that's how 20 I see it. 21 MR. DEPP: But if things get heated and 22 it looks like it's going somewhere nasty and the</p>
<p style="text-align: right;">2360</p> <p>1 ringing, you know. And it was not long before 2 that. And, so, I thought maybe this will make you 3 happy. Will it make you happy? Would you like to 4 hit me in the ear again? Would that make you feel 5 better? Will that make you stop this? I would 6 have done anything to have stopped, outside of 7 taking anything to some physical level. I 8 disagreed with that wholeheartedly. That's not 9 me. That's not who I've ever been. That's not 10 who I'll ever be. 11 Q Mr. Depp, I'm going to play another 12 audio recording. This is a different portion from 13 what Mr. Rottenborn played for you today. It's 14 DX58 -- 598. I believe the portion Mr. Rottenborn 15 played was designated 598B, so this will be 598C. 16 A Okay. 17 Q First, I would like to play the portion 18 from 31 minutes, 14 seconds to 33 minutes, 19 four seconds. 20 THE COURT: Any objection to 598C? 21 MR. ROTTENBORN: No, Your Honor. 22 MS. MEYERS: Then we'll go on and play</p>	<p style="text-align: right;">2362</p> <p>1 name-calling begins and all that stuff, I've got 2 to get away. 3 MS. HEARD: Okay. 4 MR. DEPP: Because I don't want to be 5 ever in a situation again like that. Never. 6 MS. HEARD: Me too. Me too. 7 MR. DEPP: Never, so -- 8 MS. HEARD: Me too. 9 MR. DEPP: So don't freak out if we do 10 have a fight and I walk away. 11 MS. HEARD: I'm not going to do that. 12 I'm asking you to stay when you feel you're also 13 in the interest of working it out. 14 MR. DEPP: I think it's a good idea for 15 us to take a moment or two or -- not even a 16 moment. Take some time. Take some time to think 17 about ourselves without being, you know, barraged 18 by each other's fucking bullshit, whatever. Just 19 let's take a break from it and then come back, try 20 and be calm, and walk through the thing. But I'm 21 not going to stand and fight with you. 22 MS. HEARD: I don't want that.</p>

2363	1 MR. DEPP: You can call me a coward, 2 you can call me any name you want, all those 3 names. Do it. But I will not do it again. 4 MS. HEARD: Please stop asking -- I 5 mean, please, can you stop for the sake of this 6 conversation? 7 MR. DEPP: I'm just saying I won't do 8 it again, that's all. 9 (Whereupon, the following audio was 10 played.) 11 MR. DEPP: Okay, great. Then let's 12 take our space and let's not do this anymore 13 because I'm really getting frustrated and I'm 14 really, really, really sick of this argument. 15 MS. HEARD: Stop, sorry. 16 MR. DEPP: Okay? So let me go, you go, 17 and I'll speak to you in a couple hours, okay? 18 Okay? 19 MS. HEARD: Stop. Okay. 20 MR. DEPP: Why are you saying stop? 21 MS. HEARD: Because you're being -- 22 MR. DEPP: Why are we --	2365	1 MR. DEPP: Amber, I'm not pushing you. 2 I'm rushing you, that's it. I need space. I 3 don't want this conversation anymore right now. I 4 need space. I will take my space, whether you 5 like it or not. I will take it. And you will 6 take your space. But if you keep haunting -- 7 MS. HEARD: I'm not doing anything to 8 you. 9 MR. DEPP: -- me and this continuing 10 its -- 11 MS. HEARD: I'm not continuing it. I'm 12 begging you to stop. 13 MR. DEPP: I'm stopped. Stopped. Now 14 I have to go, okay? So we will speak to each 15 other in a couple of hours, okay? I hope you have 16 some kind of revelation that makes you feel 17 better, you know? I hope I do, too. But we'll 18 just see when I get home, and we'll just talk or 19 we won't talk or, you know, we'll finish this or 20 we won't finish it. 21 MS. HEARD: I just need you to stop. 22 Please, stop doing this. Please, you cause so
2364	1 MS. HEARD: Because it causes me so 2 much stress when you leave, when you walk away 3 from me. You don't understand how much worse for 4 me it is. 5 MR. DEPP: I can't believe this. 6 MS. HEARD: Please, you're making it 7 worse for me. 8 MR. DEPP: Oh, for you? 9 MS. HEARD: Please, I'm only trying to 10 tell you so that you know you're causing me 11 immense stress right now when you walk away like 12 that. There's no reason to be mad. 13 MR. DEPP: Well, then say good-bye. I 14 haven't walked away. You're not saying good-bye. 15 You won't let me fucking leave. Let me leave. 16 MS. HEARD: Please. Stop pushing me. 17 Stop pushing me in the corner and then poking me 18 with a stick, and then saying, why are you using 19 the words you want me to say. Stop poking me. 20 Stop poking me. Stop putting me against the wall. 21 What, you don't like the wall? You don't like the 22 fucking wall? Stop pushing me.	2366	1 much fucking stress. I'm going to die at this 2 age. I'm going to fucking die. You're causing me 3 so much stress. Please, stop. Please. I really 4 have a heart attack almost every day. Please, 5 stop. Please, stop. Please, stop doing this. 6 Please, stop being so fucking mean. You're a 7 fucking bully, stop. Please, stop. I've been 8 begging you to stop. I just said can we please 9 have a normal argument, even a normal 10 conversation, normal argument. For the last hour, 11 I've been begging you, please. But you leave it 12 at this, go out for the night. I would have been 13 able to come in with you, able to go in a few 14 minutes. Would have been fine if we allowed 15 ourself to have a fucking normal arguments. 16 Please, you're killing me with this. You're 17 killing me. You're fucking killing me. Fuck. 18 MR. DEPP: Sean, could you, please, I 19 want you to just go. I want you to take your meds 20 or whatever. I'm sorry that I've upset you. 21 MS. HEARD: Yeah, I think -- thank you, 22 Sean, I'm ready to go. Thank you so much.

<p style="text-align: right;">2367</p> <p>1 Q Mr. Depp, in the beginning -- well, 2 first of all, do you know where you are when 3 you're having this discussion with Ms. Heard? 4 A The only -- excuse me. The only clue 5 that I have is that Sean is being called, I called 6 Sean and said to drive her home. I believe it was 7 probably at Sweetzer, so then she could drive 8 back -- he would drive her back to downtown, 9 penthouse 3 with -- she didn't seem in any shape 10 to drive, to me. 11 Q And earlier in the clip, there was a 12 reference to a bloodbath. What does that mean in 13 the context of that conversation? 14 A I don't know. Again, it seems like 15 some word that was -- 16 MR. ROTTENBORN: Objection, Your Honor. 17 He said he doesn't know. 18 THE COURT: All right. I'll sustain 19 the objection. 20 Next question. 21 Q Mr. Depp, at the end of the day, on 22 Thursday, Mr. Rottenborn played an audio recording</p>	<p style="text-align: right;">2369</p> <p>1 to come within, I don't know, a hundred, 200 feet, 2 or something, of her. So, at first, I said -- 3 MR. ROTTENBORN: Objection, Your Honor. 4 The question was, simply, do you remember when 5 that was from? It's beyond the scope. 6 THE COURT: Okay. 7 Q So, where were you when that recording 8 was taken? 9 A That was in San Francisco at a hotel. 10 So we went to our hotel room so we could finish 11 the discussion that she wanted to have with me. 12 Q And how did that discussion go? 13 A Not particularly well. I was quite 14 confused as to why I had been summoned to her at 15 that point, since all the news was -- all the news 16 was just about the fact that I had allegedly done 17 all these horrible things to her. And, so, I was 18 talked into going there, I met with her in hopes 19 that she would retract her lies that the world was 20 now fed, they had been fed. And in no way was she 21 ready to do that, and I couldn't understand why I 22 was there. Everything had been taken from me. My</p>
<p style="text-align: right;">2368</p> <p>1 for you where you were heard saying you're going 2 to hurt yourself. 3 Do you remember that? 4 A Yes, I do. 5 Q Okay. And I'm not going to play that 6 audio recording again. It seemed upsetting to 7 you. But I do want to ask you a couple questions 8 about that, okay? 9 A Sure. 10 Q Could you, please, tell the jury when 11 that recording is from? 12 A That recording is from July of 2016. 13 This was a couple of months, a few months after 14 the restraining order had been put on me. I had 15 been on tour through Europe, and then coming 16 through the States, I got messages from Christian 17 Carino, who was both of our former agent, saying 18 that Ms. Heard wanted to meet with me in 19 San Francisco because we had a -- one of our last 20 dates on the tour was San Francisco. And I was 21 confused as to why Ms. Heard wanted to meet with 22 me, especially since I was under a court order not</p>	<p style="text-align: right;">2370</p> <p>1 children couldn't escape the fact that all this 2 had gone down. 3 MR. ROTTENBORN: Objection, Your Honor. 4 The question was, how did the discussion go? He's 5 talking about his children. Way beyond the scope. 6 THE WITNESS: I'm just talking in -- 7 THE COURT: Sir, just wait for the 8 objection. 9 MS. MEYERS: I think he's describing 10 the context around that conversation. 11 MR. ROTTENBORN: It's way beyond the 12 scope of the question. 13 THE COURT: All right. I'll sustain 14 the objection. 15 Next question. 16 Q Mr. Depp, why were you threatening to 17 hurt yourself in that audio recording? 18 A In fact, I wasn't threatening to hurt 19 myself. I felt that Ms. Heard had brought me to 20 San Francisco, at that point, it was clear, under 21 false pretenses. I don't know what she was after. 22 So, I had a knife in my pocket and I</p>

2371	<p>1 just took the knife out and I said, here, cut me. 2 That's what you want to do. Ultimately, you've 3 taken everything. You want my blood, take it. 4 Have my blood. 5 Then she said, no, no. And then I 6 said, look, if you don't -- if you're not going to 7 take it, you want it, I know you want it, that's 8 all I've got left, take it. If she wasn't going 9 to do it, I would have done it because that's 10 psychologically, emotionally where I was. I was 11 at the end. I was broken. 12 Not only had I had to deal with 13 everything from coming in from, you know, arrows 14 from all over the world, but now she's -- I don't 15 know what she was trying to do. So I just thought 16 the only answer is, here, cut me. Take my blood. 17 That's all I've got left to give you. 18 And, obviously, there was no threat to 19 Ms. Heard with that knife. It was about spilling 20 my blood because I thought that she -- the only 21 thing she didn't have at that point. And I was 22 broken and really just at the end. Just at the</p>	2373	<p>1 you give me the numbers again so I have them for 2 the record? What are you going to play? 3 MS. MEYERS: It's 357 beginning at 4 18 minutes, 43 seconds through 21 minutes, 5 46 seconds. 6 THE COURT: All right. Any objection 7 to 357A? 8 MR. ROTTENBORN: No, Your Honor. 9 THE COURT: All right. 357A in 10 evidence. 11 (Whereupon, the following audio was 12 played.) 13 MR. DEPP: It been going on too long 14 now, and we've just got to stop this. It's got to 15 stop it. 16 MS. HEARD: I don't know how to get my, 17 um, reputation back. 18 MR. DEPP: We write a letter together. 19 MS. HEARD: Saying? 20 MR. DEPP: Saying that we're going to 21 take this out of the public eye. Saying that 22 we're going to try ad work this out on our own.</p>
2372	<p>1 end. I couldn't take it anymore. 2 It's -- I thought -- I mean, everybody, 3 I know that that's his job, but that was quite 4 cruel -- 5 MR. ROTTENBORN: Objection, Your Honor. 6 We're well beyond the scope. 7 THE COURT: Okay. I'll sustain the 8 objection. 9 Next question. 10 MS. MEYERS: I would like to play a 11 portion from Plaintiff's Exhibit 357, specifically 12 the portion at 18 minutes, 43 seconds through 13 21 minutes, 46 seconds. 14 THE COURT: 357; is that correct? 15 MS. MEYERS: 357, yes. 16 THE COURT: All right. So is this 17 going to be another one where it's going to be an 18 A, or is this going to be all that's going to be 19 offered? 20 MS. MEYERS: Why don't we go with A, to 21 be safe? 22 THE COURT: We're going with A. Can</p>	2374	<p>1 Saying that the media has created such a fucking 2 hateful storm that it's sickening. That we love 3 each other and that we want to make sure each 4 other's okay. How we had fights in the past, how 5 we had this, or whatever. Fuck it. They already 6 know all that shit, don't matter. 7 Here's the deal -- 8 MS. HEARD: No, it matters, I have 9 been -- I have been -- you have no idea. Every 10 ounce of my credibility has been taken from, I 11 mean, and then shown in a dishonest way, you know. 12 MR. DEPP: Amber, the abuse -- the 13 abuse thing is -- we've got to deal with that, 14 yeah. We've got to deal with that, Amber. 15 MS. HEARD: And we don't have any way 16 of -- my credit -- it's my credibility. You know, 17 I -- I don't. 18 MR. DEPP: Then why did you put that 19 out there? 20 MS. HEARD: I did not. You forced me. 21 Your team forced me to by going on the offense. 22 MR. DEPP: I didn't force you to.</p>

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1 MS. HEARD: And then I'm so discouraged 2 to then leave. I promise. Look up the timeline 3 for these things. Everything is -- forget it. 4 Forget it. You don't believe what I say. You 5 don't believe what I say. But I did not -- I did 6 not choose this. You had -- every step of the way 7 has been an offense. 8 MR. DEPP: I did not put this anywhere. 9 I didn't -- let me talk to the fucking team. 10 MS. HEARD: I did not call the cops. I 11 mean, there's no cases against you. 12 MR. DEPP: IO called the cops. You 13 told iO to call the cops. 14 MS. HEARD: I did not call the cops. 15 And I did not give them any statement when they 16 came. I've been trying to protect you. 17 MR. DEPP: You told iO to call the 18 cops. 19 MS. HEARD: When? While it was 20 happening? 21 MR. DEPP: Yes. 22 MS. HEARD: Oh, I'm sorry. I'm sorry	1 big -- 2 BY MS. MEYERS: 3 Q Mr. Depp, when did you have the 4 conversation reflected in this recording with 5 Ms. Heard? 6 A I don't recall exactly when it was. 7 Q What's your best estimate? 8 A My best estimate is that it was 9 before -- long before -- a while, quite a while 10 before the meeting in San Francisco in July. 11 Excuse me. 12 Q How far after May 21st, 2016, do you 13 think that conversation was? 14 MR. ROTTENBORN: Objection. Calls for 15 speculation. He already said he doesn't remember 16 when it was. 17 MS. MEYERS: I'm asking for his best 18 estimate. 19 THE COURT: I'll allow him to answer, 20 if he can. 21 A Sorry, can you ask it again? I was 22 distracted.
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1 because the last time that it got pretty heated 2 between us, I really did think I was going to lose 3 my life, and I thought you would do it on 4 accident. And I told you that. I said, oh, my 5 god, I thought the first time -- 6 MR. DEPP: Amber, I lost a fucking 7 finger, man, come on. I had a fucking -- I had 8 fucking -- a mineral can -- I had mineral spirits 9 thrown at my nose. 10 MS. HEARD: You can, please, tell 11 people it was a fair fight, and see what the 12 judge -- see what the jury and judge think. Tell 13 the world, Johnny. Tell them, Johnny Depp, I, 14 Johnny Depp, yes, I'm a victim, too, of domestic 15 violence and I -- 16 MR. DEPP: Yes. 17 MS. HEARD: -- you know it's a fair 18 fight. And see how these people believe or side 19 with you. 20 MR. DEPP: It doesn't matter if it's a 21 fair fight, my ass. 22 MS. HEARD: Exactly, because you're a	1 Q How long after May 21st, 2016, do you 2 believe that conversation took place? 3 A I would say that it was not too far, 4 maybe a couple of months. It was far enough to 5 where the world media was already bombarding me. 6 So it was -- it was an attempt to try to make all 7 the -- 8 MR. ROTTENBORN: Objection, Your Honor. 9 Beyond the scope. 10 THE COURT: All right. I'll sustain 11 the objection. 12 Next question. 13 Q What are you referring to when you said 14 you and Ms. Heard would write a letter together? 15 A I was trying to make a peaceful 16 settlement. 17 Q And what are you referring to when you 18 say you lost a finger? 19 A A very large bottle of vodka severing 20 my index finger -- or my middle finger in 21 Australia. 22 Q And what were you referring to when you

2379	1 said a can of mineral spirits was thrown at your 2 nose? 3 A One of the arguments on the island, 4 where Ms. Heard had been howling at me with some 5 argument, and she picked up a can of mineral 6 spirits, about yea big, and just heaved it at me, 7 and it struck me on the bridge of the nose, right 8 there, you know, in the forehead. 9 Q What did you say in response when 10 Ms. Heard said, tell the world, Johnny, tell them 11 Johnny Depp, I, Johnny Depp, I'm a victim, too, of 12 domestic violence? 13 A I said, yes, I have. 14 MS. MEYERS: I have nothing further, 15 Your Honor. 16 THE COURT: All right. Sir, you can 17 have a seat next to your attorney, please. 18 All right. 19 Your next witness. 20 MR. MONIZ: We call Ben King, Your 21 Honor. 22 THE COURT: Ben King.	2381	1 assistant, presently, with an individual who also 2 lives in Central London. 3 Q Okay. Can you lean into the microphone 4 a little bit? 5 A Yeah, certainly. There we go. 6 Q Okay. Did you say you're a house 7 manager? 8 A That's right. Personal assistant, 9 house manager. 10 Q And can you just tell those of us in 11 the courtroom who aren't familiar, what does that 12 mean? 13 A I work presently for a gentleman who's 14 in the entertainment industry, who – and I manage 15 his property, large apartment in Central London, 16 take care of the daily needs and running of the 17 oversight of that stuff, and traveling with him, 18 when needed, and things like that. 19 Q And how long have you been in this 20 occupation? 21 A Ooh, since about 1991. I started in 22 private services, if you'd like, in-house
2380	1 MR. DEPP: Can I do away with these? 2 THE COURT: You can leave that there. 3 MR. DEPP: Okay. 4 BEN KING, 5 a witness called on behalf of the 6 Plaintiff and Counterclaim Defendant, having been 7 first duly sworn by the Clerk, testified as 8 follows: 9 EXAMINATION BY COUNSEL FOR THE PLAINTIFF AND 10 COUNTERCLAIM DEFENDANT 11 THE COURT: Go ahead, sir. 12 BY MR. MONIZ: 13 Q Good afternoon, Mr. King. 14 A Good afternoon. 15 Q Would you, please, state your full name 16 for the record. 17 A Ben King. 18 Q And, Mr. King, can you briefly tell us 19 where you're from? 20 A London, Central London. 21 Q Okay. And can you tell us a little bit 22 about your background? What's your occupation? 23 A I'm a house manager, personal	2382	1 management and butlering, all that stuff. 2 Q Typically based around London? 3 A Correct. I started work in London, was 4 my first big job at Buckingham Palace, oddly 5 enough, for four years. And then I continued in 6 different positions full-time and self-employed, 7 freelance capacity for many years as well. 8 Q Okay. Just generally, can you tell us, 9 without getting into any specifics, but what type 10 of people would you say you typically provide 11 these services for? 12 A Generally, high net worth people. 13 Individuals or families, residences. 14 Q Okay. Are you familiar with the 15 plaintiff in this case, Johnny Depp? 16 A Yes, I am. 17 Q And how are you familiar with Mr. Depp? 18 A I met and worked for Mr. Depp in 2014, 19 and, subsequently, a couple of times after that. 20 Q Okay. Can you briefly just explain to 21 the jury how it came to be that you were working 22 for Mr. Depp?

<p style="text-align: right;">2383</p> <p>1 A Sure. Yes, I -- at that point, I was 2 working in the freelance, self-employed capacity. 3 I was -- a lot of my jobs came through friends of 4 friends, you know, personal recommendations, et 5 cetera. And I was asked, by a friend of a friend, 6 on this occasion, would I be available, A, to go 7 and manage a property where Mr. Depp was going to 8 be staying for about a month in Central London. 9 Was I available, would I be willing to do it. And 10 I was available at that point, and so I said, 11 yes -- yeah, absolutely. 12 Q And just to make sure we're on the same 13 page. What time frame are we talking about here? 14 A That was August 2014. 15 Q And did you, in fact, end up working 16 for Mr. Depp in that time frame? 17 A I did, yes. 18 Q Now, just to clarify, were you employed 19 by Mr. Depp? 20 A No. 21 Q So who was your employer? 22 A I was paid through a large hotel which</p>	<p style="text-align: right;">2385</p> <p>1 London at this point? Just kind of describe, for 2 us, the house. 3 A This house? 4 Q Yeah. 5 A This was in Mayfair, a large townhouse 6 in an old building but it was very contemporary 7 inside, modern. Furnished very modern sort of 8 way. Quite spacious, maybe four, five bedrooms, I 9 think, a small indoor pool, a small gym. Quite an 10 open plan layout throughout the house. 11 Q Okay. And how long were they there? 12 A For the month, essentially, yes. 13 Q Okay. Can you tell us, just generally, 14 what hours you would typically work in a day while 15 you were working for them in London in this time 16 frame? 17 A Yeah, approximately, it depended on 18 what was going on, but I mean, generally, 7 or 8 19 in the morning until 7 or 8 in the evening, 20 typically. There was a chef employed as well, 21 Russell, brilliant chef. He tended to stay after 22 I left in the evenings. He would cook dinner,</p>
<p style="text-align: right;">2384</p> <p>1 was close by to the house, who also -- they 2 provided the housekeeper who was working with us 3 for that month as well, so I was paid through 4 them. 5 Q Okay. Can you just generally explain 6 to us what kind of work you were doing for 7 Mr. Depp and Ms. Heard in this time frame? 8 A Sure. Yeah. It was the setup of the 9 house, basically. Sorry. Setting up the house 10 initially, which meant ahead of the principals 11 arriving, which meant making sure all the linens 12 were in place for the bedrooms. It was a sizeable 13 property. Just organizing everything ahead of 14 their arrival. Once they arrived, it was the 15 management of that property, the oversight of it, 16 and the day-to-day running, some service, you 17 know, like butler service, and managing the 18 housekeeper day-to-day, through that whole month. 19 Q And when you refer to "the principals," 20 who are you referring to? 21 A Mr. Depp and Ms. Heard. 22 Q Where, exactly, were you working in</p>	<p style="text-align: right;">2386</p> <p>1 serve dinner, and thankfully cleaned up after 2 dinner so I could leave sort of early to mid 3 evening, usually, most days. 4 Q Okay. 5 A Unless we had guests. Sorry, unless we 6 had guests or other things going on. 7 Q All right. During your time managing 8 the house for Mr. Depp and Ms. Heard in 2014, did 9 you have occasion to observe the interactions 10 between Mr. Depp and Ms. Heard? 11 A Yes, absolutely. 12 Q How often? 13 A Most daily, I would say. Pretty much 14 most days through that period. 15 Q And did you, yourself, interact with 16 Mr. Depp and Ms. Heard? 17 A Yes. Also daily, I would say. 18 Q Which of them would you say -- or did 19 you see one of them more often than the other? 20 A Ms. Heard was there. Mr. Depp was the 21 reason, I think, they rented the house, because 22 Mr. Depp was working at a studio. I think it was</p>

<p style="text-align: right;">2387</p> <p>1 Mortdecai, the movie. So Ms. Heard was there at 2 the house most of the days. Mr. Depp often went 3 to work and came back later on in that evening, 4 that day. 5 Q Okay. How would you generally describe 6 the interactions that you observed between 7 Mr. Depp and Ms. Heard? 8 A Initially, very loving towards each 9 other. Nice couple. Mr. Depp was always a 10 gentleman and keen to make sure Ms. Heard was 11 taken care of, anything she needed. Often poured 12 a glass of wine for her, just nice, you know, 13 pleasant. 14 Q How about your own interactions with 15 the couple? How did you get along with them both? 16 A I think very well. Yeah, they were 17 very open to me. And, I mean, my background is 18 quite formal, so it was quite an informal setting. 19 It was – I was able to ask questions to either of 20 them. Ms. Heard, especially, was really helpful 21 to get information about what time they wanted 22 dinner, you know, basic stuff like that, or</p>	<p style="text-align: right;">2389</p> <p>1 MR. MONIZ: I don't think it's offered 2 for the truth, You Honor. I think it's just 3 offered to explain his own behavior towards the 4 couple. 5 MR. NADELHAFT: Can we approach? 6 THE COURT: Okay. 7 (Sidebar.) 8 THE COURT: I don't know what he's 9 going to say, so I'm not sure. 10 MR. NADELHAFT: I think he's going to 11 say (indiscernible). 12 THE COURT: He was told that? 13 MR. NADELHAFT: He was told by Depp's 14 agent, Depp's assistant that (indiscernible). If 15 it's not offered for the truth, what else would it 16 be for? 17 MR. MONIZ: Yeah, it's just being 18 offered for the fact -- and that is what he is 19 going to say, I think, is that he was informed -- 20 he told her on that basis, he was bringing wine -- 21 he understood he that wasn't bringing wine to 22 Mr. Depp. It was just to explain his own</p>
<p style="text-align: right;">2388</p> <p>1 anything. It was good interaction all the time 2 with the both of them. 3 Q Okay. Now, you mentioned wine. Could 4 you tell us, to what approximate extent did you 5 observe either of them consume alcohol over the 6 course of these four weeks? 7 A Sure. When I started that job or when 8 I was taking that job on, I was told, I think, by 9 Mr. Depp's assistant that he was – 10 MR. ROTTENBORN: Objection, Your Honor. 11 Hearsay. Mr. Depp's assistant. 12 THE WITNESS: Oh, sorry. 13 BY MR. MONIZ: 14 Q Can you answer without telling what you 15 were told? 16 A I was made aware. 17 MR. ROTTENBORN: Same objection. 18 THE COURT: Can you put your microphone 19 on? 20 MR. NADELHAFT: Same objection. He's 21 explaining what he was told; now he is saying I 22 was informed.</p>	<p style="text-align: right;">2390</p> <p>1 understanding of the context. 2 MR. NADELHAFT: You Honor, it's 3 hearsay. 4 THE COURT: Still hearsay. Thank you. 5 (Open court.) 6 BY MR. MONIZ: 7 Q All right. So, Mr. King, moving past 8 the conversation, let's not touch on that. 9 A Yes. 10 Q In general, can you describe the 11 alcohol consumption that you personally observed 12 and what you personally witnessed? 13 A Sure. I didn't see Mr. Heard – 14 Mr. Depp, excuse me, consume any alcohol during 15 that time in London. There was a large 16 confinement of wine that had been delivered to the 17 house at the start of the visit, many cases, I had 18 to store, I had to find a place to store. 19 And generally speaking, on a 20 day-to-day, about one or two boxes of red wine 21 were consumed per day. I think that's fair to 22 say.</p>

2391	1 Q Did you ever observe Mr. Depp drink any 2 of the wine? 3 A No, I didn't. 4 Q Did you ever observe Ms. Heard drink 5 any of the wine? 6 A Yes, I did. 7 Q Regularly? 8 A Daily. 9 Q Now, I think you already testified that 10 you observed interactions with Mr. Depp and 11 Ms. Heard and you generally found them to be 12 friendly; is that fair? 13 A Very much so, yes. 14 Q Were there any exceptions to that? 15 A Towards me? 16 MR. NADELHAFT: Objection. Leading. 17 MR. MONIZ: I'll rephrase. 18 THE COURT: Okay. 19 Q Did you ever observe any arguments 20 between the two? 21 MR. NADELHAFT: Objection, Your Honor. 22 THE COURT: I'll allow it. Go ahead.	2393	1 footsteps sort of going across, there's, like, a 2 corridor, if you like, to the top of those stairs 3 that went around the master suite. Loud footsteps 4 and then more footsteps following, more shouting. 5 And that sort of went on for some time. I mean, I 6 knew what time they needed to leave. I don't 7 recall what time that was, but they – I knew they 8 were supposed to have left already, and it went on 9 for a bit. 10 Q Do you recall how that first fight or 11 argument resolved? 12 A Not necessarily. I mean, I know that 13 they left eventually, albeit late. I don't know 14 how it really resolved, as I made myself busy but 15 not going too far away from the door, make sure I 16 saw them out. 17 Q All right. And then what about the 18 second argument that you mentioned? 19 A Second one, I was pretty much in the 20 same vicinity, the same room, on the ground floor. 21 Again, the couple were in the TV room, I think, 22 which was off the main sitting room, early
2392	1 A Oh, yes I did. 2 Q Can you describe, for us, the arguments 3 that you observed? 4 A I can describe two of them, certainly. 5 There were a few arguments during that month. 6 Q Let's start with those two. 7 A Okay. The first one I remember was an 8 evening, actually both the ones I recall were – I 9 was close to were evenings. The first particular 10 evening, the couple had agreed to go out for 11 dinner, I guess. I know the car was waiting 12 and – in the little courtyard there, ready for 13 them to go, and security was waiting to take them. 14 I was waiting to see them out into the cars on the 15 foot of the – on the ground level, ground floor 16 level to wait to see them out, essentially. 17 And I heard – the first thing I heard 18 was Ms. Heard shouting upstairs in the master 19 suite, where they were getting ready to leave. I 20 heard her shout something, I don't recall what, 21 you know. I was in the vicinity, I wasn't really 22 there to listen. And I heard footsteps, loud	2394	1 evening, and I was going about my early evening 2 duties, replenishing drinks close by, lighting the 3 fire, lighting candles, whatever it might have 4 been. I was close enough to hear Ms. Heard say 5 "Why did you take your hand away from me, Johnny? 6 Do you love me anymore?" Like, not in a playful 7 way I might add. And I think he replied "Of 8 course I do. Don't be silly. Of course I do." 9 And it kind of launched from that 10 point. And at one point, Mr. Depp got up and went 11 to the bathroom or went upstairs and I was sort of 12 scuttling around out of the way because, you know, 13 I wasn't there listening, I was just there doing 14 my stuff in and around them. Yeah, it was a 15 strange, sort of bizarre way to start an argument, 16 but... 17 Q How would you describe Ms. Heard's tone 18 when she said "Why did you take your hand away, 19 Johnny?" 20 A Accusatory. Spoiled teenage child, 21 maybe. Is that fair? Not playfully, let's put it 22 that way. More angrily.

2395	1 Q Over the course of the four weeks in 2 August and September of 2014, when you were 3 working with Mr. Depp and Ms. Heard in the 4 London -- 5 A Yes. 6 Q -- did you ever observe any physical 7 violence, of any kind, between the two of them? 8 A No, I didn't. 9 Q Did you ever observe any injuries on 10 either one? 11 A No, neither of them. 12 Q Okay. After those four weeks, did you 13 ever work for Mr. Depp or Ms. Heard again? 14 A I did. A couple of occasions. The 15 following year was the first one, the following 16 spring. 17 Q Okay. And where was that? 18 A In Australia. 19 Q And was it unusual for you to be in 20 Australia? 21 A In Australia maybe, but not unusual for 22 me to travel with -- for clients for my	2397	1 I flew in on that day. 2 Q Okay. How did your job 3 responsibilities in Australia compare to your job 4 responsibilities in London? 5 A Much the same. Just on a bigger scale. 6 The house was larger. There was a bit more setup 7 to do. But, essentially, the same oversight of 8 the house, responsible for it during the whole 9 gig. 10 Q And were you employed by Mr. Depp or 11 Ms. Heard? 12 A No. 13 Q Who were you employed by? 14 A Essentially, by Disney, the production 15 company affiliated with Disney who were making the 16 movie. I think their name was Herschel 17 (phonetic), was the production company. 18 Q Now, I think you said you arrived in 19 Australia on February 4th, 2015, correct? 20 A Yes. 21 Q Do I have that right? 22 A Yes.
2396	1 assignments, to wherever it was needed. 2 Q Okay. How exactly did it come about 3 that you were in Australia with Mr. Depp and 4 Ms. Heard? 5 A Towards the end of the London visit, 6 Mr. Depp had kindly said, thanks so much for 7 looking after us, we really like you. Maybe if 8 you're free next year and we can arrange it, we 9 can make it happen. Perhaps you'll be able to 10 come to Australia with us, I've got a film, 11 Pirates 5. So I said, great, I'd love to, 12 obviously. I was freelance at the time so it was 13 going to be about four months work. I think it 14 was billed up, so, I thought, yes, I wouldn't mind 15 some of that. Thank you very much. 16 Q And where in Australia were you 17 staying? 18 A Gold Coast. It's an area -- Brisbane 19 was the main airport. So, about an hour's drive 20 south of Brisbane. 21 Q And do you recall when you arrived? 22 A I arrived on February the 4th. I know	2398	1 Q How about Mr. Depp and Ms. Heard, when 2 did they arrive? 3 A The setup for me, for us was about a 4 few weeks. I think they arrived towards the end 5 of February, 2015. 6 Q And between your arrival and their 7 arrival, what had you been doing? 8 A Just setting up the house. I lived on 9 site. There was a guesthouse on site, 10 two-bedroom, single-story guesthouse that I stayed 11 in for those first couple weeks, setting up the 12 house and just getting everything ready during 13 that time. Then I moved out to apartments, which 14 we all had -- we, I mean a lot of the crew, the 15 chef had an apartment. We all had apartments 16 about a 30-minute drive south of the house. 17 Q Okay. So we're talking about this 18 house in Australia. 19 A Yes. 20 Q So can you kind of describe that 21 property to us? 22 A Yes. It was a large house on a few

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1 acres of land, three-story house, five bedrooms
2 with two or three buildings on – within the
3 grounds as well. A good size house, beautiful
4 house. Beautiful location.
5 Q How many entrances would you say it
6 had?
7 A Entrances? Many. I mean, many on –
8 on the lower ground level, out to the garden; on
9 the first or on the main floor level, there was
10 many entrances. I mean, every room in that house
11 had a balcony, at least. Every room on the lower
12 ground floor had a sliding door, a door out. The
13 utility room, the garage, the gym, the –
14 everything. Obviously, the front door. Many. On
15 the main level, large glass sliding doors out to
16 the pool area, which had a gazebo and steps down
17 to the ground.
18 Q Okay. Once Mr. Depp and Ms. Heard
19 arrived to stay at this house, was anybody else
20 staying in the house?
21 A Staying in the house? No.
22 Q Was anybody else staying on the

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1 grounds?
2 A On the property, yes. I mean, there
3 was a couple there -- caretaking couple, Sean and
4 his wife, Sandra, who worked for the owner of the
5 house. They lived on site, essentially, all the
6 time. They were there pretty much throughout, and
7 their house was whatever, couple hundred yards
8 away from the main house. And, yes, security was
9 there also.
10 Q All right. Sticking with the
11 caretaker, just briefly, about how long would it
12 take, would you estimate it would take to walk
13 from the main house to the caretaker's house?
14 A Under five minutes. Yeah, no more than
15 five minutes.
16 Q And then you mentioned security. What
17 was the security setup?
18 A Security was set up by Jerry Judge.
19 They reported -- they stayed in the grounds for
20 the duration. They didn't come in the house.
21 They had a little sort of shack, right by the
22 perimeter wall, where they would do their -- start

2401

1 their patrols from, walk around the grounds,
2 around the exterior of the house at certain times
3 of the day, write their reports and go back and
4 stand there, their shack.
5 Q And how many security guards would be
6 on site at any particular time?
7 A I think one in the day, one in the
8 night. So, 12 hours about, as I remember it.
9 Q Oh, it was 24/7?
10 A Yes, definitely.
11 Q Okay. Do you know whether those were
12 local employees or were they regularly employed by
13 Mr. Depp?
14 A They were Australian, yes.
15 Q Okay. Now, I think you said you were
16 not on the property 24/7, right? You had an
17 apartment elsewhere?
18 A Correct. I kept the same hours as I
19 did in London, essentially, Monday to Friday, 9 to
20 5, not quite, but 7:00 a.m. to evening, until
21 everything was set up and I could leave.
22 Q Okay. And did you have an opportunity,

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1 when you were in Australia, to observe Mr. Depp
2 and Ms. Heard's interactions with each other?
3 A Yes. Of course.
4 Q And how would you describe them?
5 A Initially, very good. Like in London,
6 seemed very pleasant towards each other.
7 Q Did you observe any arguments?
8 A Yes. Several.
9 Q Okay. Can you tell us a little bit
10 about those?
11 A Yes. Similar pattern, it seemed, to
12 London arguments. One in particular was very
13 similar to the second one in London. Started in
14 the TV room, funny enough, loud, loud voices and
15 Mr. Depp leaving the room, shutting the door,
16 going to another room to play his guitar or, you
17 know, to a bathroom, whatever, and Ms. Heard
18 closely following and opening the door or
19 certainly rapping on the door, it seemed to
20 continue.
21 Q Can you give us an estimate about how
22 many arguments you think you observed in this time

2403	1 frame, approximately? 2 A Several. I was there for several 3 months, so certainly many more than in London. 4 Q Did you observe any alcohol consumption 5 in Australia, by either of them? 6 A Yes. Again, Ms. Heard, again, my 7 responsible -- part of the responsibility was to 8 provision the house and have everything set up for 9 that, so I regularly brought red wine for 10 Ms. Heard. What she consumed, you know, the same 11 amount as in London, I think. 12 Q And what amount is that? 13 A Generally speaking. One or two bottles 14 a day. 15 Q Okay. Did you ever observe Mr. Depp 16 start any arguments with Ms. Heard? 17 MR. NADELHAFT: Objection. 18 THE COURT: Hold on. Objection. 19 THE WITNESS: Sorry. 20 THE COURT: Would you put your 21 microphone -- there you go. 22 MR. NADELHAFT: Leading. Objection.	2405	1 sort of seeing him to say good-bye, you know, have 2 a good weekend. 3 Q How about Ms. Heard? Do you recall if 4 she was there when you left? 5 A Yes, she was. 6 Q Okay. Did anything unusual happen that 7 weekend? 8 A Yeah. I would say something pretty 9 unusual happened. 10 Q Can you tell us about that? 11 A Yeah, I can. 12 MR. NADELHAFT: Foundation. 13 THE COURT: All right. Foundation. 14 Do you want to lay a foundation? 15 Q At some point, did you become aware 16 that something had happened? 17 A Yes. 18 MR. NADELHAFT: Objection. It calls 19 for hearsay. 20 THE COURT: All right. I'll sustain 21 that objection. 22 Q All right. Turning to the following
2404	1 Leading. 2 THE COURT: I'll sustain as to leading. 3 If you want to rephrase. 4 MR. MONIZ: I'll move on. 5 THE COURT: New question, okay. 6 Q Do you remember anything about Friday, 7 March 6th, 2015? 8 A It was essentially a normal Friday, if 9 you'd like, end of the week, yay. Nothing 10 extraordinary about that day. 11 Q Did you come into work that day? 12 A Yeah. Yeah, I was there. 13 Q Okay. Do you recall about what time 14 you would have left the house on that date? 15 A I remember taking a photo of the 16 beautiful sunset over the pool, the sun was set 17 over the pool and the creek, and I took a photo of 18 that early evening, so 6:30, 7, I would think. I 19 wouldn't have left much later than that. 20 Q Was Mr. Depp there when you left? 21 A I don't think so. I think Mr. Depp was 22 at the studio still on that day. I can't remember	2406	1 Sunday. 2 THE COURT: Mr. Moniz, how much more do 3 you have, because it's time for an afternoon 4 break? 5 MR. MONIZ: Think we can -- I have a 6 little bit more, Your Honor, so maybe this would 7 be a good time for a break. 8 THE COURT: Okay. Let's go ahead and 9 take our afternoon break, ladies and gentlemen. 10 Again, don't talk to anybody and don't do any 11 outside research, okay? You're excused. Thank 12 you. 13 (Whereupon, the jury exited the 14 courtroom and the following proceedings took 15 place.) 16 THE COURT: All right. Mr. King, since 17 you're in the middle of your testimony, you can't 18 discuss your testimony with anybody, to include 19 the attorneys, okay? 20 THE WITNESS: All right. 21 THE COURT: Okay. Let's take a break 22 until 4:05, okay? Let's come back at 4:05.

2407	1 THE BAILIFF: All rise. 2 (Recess taken from 3:47 p.m. to 3 4:05 p.m.) 4 THE BAILIFF: All rise. Please be 5 seated and come to order. 6 THE COURT: All right. Are we ready 7 for the jury? 8 MR. MONIZ: Yes, Your Honor. 9 MR. NADELHAFT: Yes, Your Honor. 10 (Whereupon, the jury entered the 11 courtroom and the following proceedings took 12 place.) 13 THE COURT: All right. Have a seat. 14 Your next question, sir. 15 MR. MONIZ: Thank you, Your Honor. 16 BY MR. MONIZ: 17 Q Mr. King. 18 A Yes. 19 Q Before we went on break, we were 20 discussing Friday, March 6th, 2015. 21 A Right. 22 Q After you left the house that evening,	2409	1 Kipper was Dr. David Kipper, Ms. Heard was 2 Ms. Heard, and Jerry Judge was head of security. 3 Q And when you arrived at the house on 4 Sunday, March 8th, 2015, what did you do? 5 A I just parked up and went into the 6 house. 7 Q And did you observe anything when you 8 went into the house? 9 A Yeah. I mean, initially, I walked into 10 the front door. Initially, I heard, rather than 11 saw anything. I could hear pretty hysterical 12 sobbing, crying, which sounded like Ms. Heard to 13 me. I heard Jerry Judge's voice. There's a few 14 steps as you go up into the house, so you can't 15 immediately see what's going on. So I went up the 16 steps. I could see them, Ms. Heard, over on the 17 right-hand side, toward the TV room, with Jerry 18 Judge, David Kipper was in the kitchen area, which 19 was pretty much directly ahead as you walk up 20 those steps. 21 Q And were you able to visually see 22 Ms. Heard?
2408	1 when did you next see Ms. Heard? 2 A Sunday, the 8th. 3 Q And where did you see Ms. Heard? 4 A At the house. 5 Q What were your typically hours? 6 A Monday through Friday from 7:00 or 7 8:00 a.m. until the end of the day each evening, 8 late evening, usually. 9 Q Why were you at the house that Sunday? 10 A I was called to the house by one of 11 Mr. Depp's assistants. 12 Q And about what time did you arrive at 13 the house? 14 A Around 2:00, 2:30. 15 Q Who was there when you arrived? 16 A Debbie Lloyd was there, Dave Kipper was 17 there, Amber Heard was there, Jerry Judge was 18 there. 19 Q And I think by now, probably, 20 everybody's familiar, but can you just, very 21 quickly, say who those people are? 22 A Sure. Debbie Lloyd was a nurse, David	2410	1 A Yes. 2 Q And you were able to hear her, as well? 3 A Absolutely. 4 Q How would you describe her demeanor? 5 A Hysterical. Probably the best way to 6 describe it. Crying a lot and, you know, just 7 crying uncontrollably, I think it's fair to say. 8 Q And how would you describe Jerry 9 Judge's demeanor when he was speaking with her? 10 A He was keeping her calm, saying it's 11 all right, love, it will be all right. Jerry was 12 good. Big heart, Jerry. Good guy. He was calm, 13 Jerry was always calm – well, mostly. 14 Q And what did you do next? 15 A I saw them engaged across the way 16 there, so I went into the main kitchen area, 17 which, as I said, was just directly ahead of those 18 main steps, and spoke to David Kipper. 19 Q And following that conversation, what 20 did you do? 21 A Well, he told me that Mr. Depp – 22 MR. NADELHAFT: Objection. Hearsay.

<p style="text-align: right;">2411</p> <p>1 THE COURT: All right. 2 MR. MONIZ: Your Honor -- well, may we 3 approach? 4 THE COURT: Okay. 5 (Sidebar.) 6 THE COURT: One, the question was, what 7 did you do after you spoke with Dr. Kipper? Let's 8 get that straight. 9 MR. MONIZ: Understood. Your Honor, 10 Mr. King just searched the house for the finger, 11 so he's just going to say he was told he needed to 12 look for the finger. It's not being offered for 13 the truth, it's just being offered to explain why 14 he was going around looking for the finger. He's 15 not going to testify he was told, at this point, 16 how it was lost. So it's not being offered for 17 the truth. It's purely the effect on the 18 listener. 19 MR. NADELHAFT: (Indiscernible.) 20 MR. MONIZ: Definitionally, not 21 hearsay, Your Honor. It's simply being offered to 22 explain why he is going --</p>	<p style="text-align: right;">2413</p> <p>1 You know, as one would. And he said, yeah, that 2 would be a good idea. I left him in the kitchen. 3 He said there was a lot more damage downstairs. 4 So I went to -- you know, we split up. I left him 5 in the kitchen, I went downstairs to search. 6 Q At some point, was Mr. Depp's fingertip 7 found? 8 A Yes. 9 Q Who found it? 10 A I did. 11 Q And where did you find it? 12 A Downstairs in the bar area, the games 13 room, bar area. 14 Q So, can you walk us through how you 15 found it? 16 A Yes. So I walked down the stairs, 17 there's a bit of damage down the steps, a big 18 chunk had been taken out of the marble staircase. 19 On my way down, remnants of what looked like a 20 plant pot or something around it smashed. Walking 21 down into the bar, I could see the damage that 22 Dr. Kipper had told me about, a broken ping-pong</p>
<p style="text-align: right;">2412</p> <p>1 THE COURT: If he starts saying 2 something about Johnny, we know what he's going to 3 say. 4 MR. MONIZ: He's going to say he was 5 informed that he needed to go find Mr. Depp's 6 finger. 7 THE COURT: Okay. Not the reason for 8 it? 9 MR. MONIZ: He was not informed of how 10 he lost his finger. 11 THE COURT: I think that's fine. Okay. 12 (Open court.) 13 BY MR. MONIZ: 14 Q So, you can answer the question. What 15 did you do next? 16 A I spoke to David Kipper, who was in the 17 kitchen area, seemingly rummaging through a bin. 18 He said Mr. Depp had sustained an injury to his 19 finger, one of his fingers, and he was looking for 20 the fingertip. He said it had been severed. 21 Q And -- 22 A So, I said, well, shall I help you?</p>	<p style="text-align: right;">2414</p> <p>1 table had collapsed on to the floor, lots of 2 grass, broken glass and cans strewn around the bar 3 area. 4 Q And where, exactly, was the finger in 5 the bar area? 6 A Directly below the bar. I mean, the 7 bar -- the setup like a conventional bar, that 8 stuck out from a wall, and with a marble top, 9 there was a big chunk out of that as well, like on 10 the staircase. Directly at the end of the bar, 11 there was a scrunched up piece of kitchen paper, 12 if you'd like, tissue, with lots of blood around 13 it, on it. So I thought that's probably a pretty 14 good place to look. And it was within that 15 scrunched up piece of paper on the tiled floor at 16 the end of the bar, the base of the bar, by one of 17 the barstools. 18 Q Was there any property damage around 19 the finger? 20 A Yes, a fair bit. On the floor, around 21 the area, there were puddles of what smelled like 22 alcohol to me. There seemed like several drinking</p>

<p style="text-align: right;">2415</p> <p>1 glasses, a couple of bottles, one was Stolichnaya, 2 a vodka bottle. And at the end of the bar, as I 3 said, there's a big chunk out of the bar itself, 4 the bar marble top. At the end of the bar, there 5 was plaster damage right at the end of the bar, on 6 the wall behind the bar, it was smashed and 7 cracked. There's a blue mirror that stretched 8 that whole span of behind the bar. Lots of cans, 9 again, behind the bar on the floor, broken window 10 at the end of the bar, and more plaster work 11 damage on the wall above the sink; it's sort of a 12 kitchenette, bar, if you'd like, as well. 13 Q You mentioned a bottle of vodka. Was 14 the vodka bottle intact? 15 A No. No. Nothing was really intact. 16 The top of it, you know, the top of the bottle 17 has, like, the label on it, which is how I knew it 18 was a Stolichnaya bottle, had that sort of 19 squiggly S, sort of yellow top. There was a large 20 chunk of the bottle, where, I guess, was the rest 21 of that, and several other – I mean, lots of 22 other broken glass around the area.</p>	<p style="text-align: right;">2417</p> <p>1 damage you observed? 2 A Sure. Do you want me to start at the 3 lower ground floor in that bar area? I mean, I 4 described it a lot. 5 Q Sure, that's fine. 6 A It was pretty extensive down there, all 7 that broken glass, the blood. There were a lot of 8 blood drips across that floor, as it was a kind of 9 cream-colored tile floor in that whole game area. 10 As I said, the ping-pong table was collapsed. 11 Blood drips across the floor and around the bar, 12 and the damage on the walls, as I said, the 13 plaster work at the end of the bar, behind the 14 bar, and the chunk out of the marble top. So, on 15 the ground, that was the predominant damage in 16 that area, on that level. 17 The next floor, the main floor, where 18 David Kipper was, be it in the kitchen itself, 19 again, a few broken glasses and cans on the floor, 20 soda cans behind the kitchen island, chef's 21 kitchen island, liquid, puddles. There was a 22 sitting room with a couch on a cream-colored</p>
<p style="text-align: right;">2416</p> <p>1 Q After you found the fingertip in the 2 bar area, what did you do next? 3 A Well, I covered it up in that kitchen 4 paper, took it upstairs, I might have shouted up 5 to David Kipper I found it, I'm not sure, but I 6 walked back upstairs to the kitchen. And put 7 it – got a bag, you know, little plastic bag, put 8 the fingertip in there, set it on top of some ice 9 in this plastic kitchen container, and pretty much 10 handed it over to David Kipper and Jerry Judge, I 11 think, at the time, who were keen to get it to the 12 hospital quickly to see if it could be reattached. 13 Q Do you recall about what time you found 14 Mr. Depp's finger in the bar area? 15 A It was about an hour after I got there, 16 so it would have been around 3:30, I would think, 17 3:20, 3:30. 18 Q Okay. Now, you've told us a little bit 19 about the state the house was in when you arrived. 20 A Yes. 21 Q Can you generally describe for us, and 22 maybe go level by level through the house, what</p>	<p style="text-align: right;">2418</p> <p>1 couch, which had a fair amount of blood drops on 2 the cushions, and that was obvious. The TV, which 3 was directly in front of that, wall-mounted TV, 4 was cracked with seemed like remnants of a coffee 5 cup embedded in some of it, and the rest, below, 6 looked like coffee splattered behind and 7 underneath the TV, and on the floor as well. 8 Through there, it's an art studio, so a 9 lot of the art materials from that, you know, 10 paintbrushes, paint, various art materials were on 11 the floor. A lot of paint on the floor, blood 12 drips throughout that area as well, especially 13 over the, it was a vast sort of wooden pocket 14 door, so there was a lot of oil paint and blood 15 drips up to the staircase. 16 In one of the bedrooms, there were two 17 bedrooms off of the main kitchen area, one of 18 those bedrooms had blood drips on the duvet and 19 the lamp had seemingly been broken, the shade was 20 removed. There were a couple of lamp shades in 21 that -- in the art studio area on the floor. That 22 was about the extent of the damage.</p>

<p style="text-align: right;">2419</p> <p>1 Going up the stairs to the next level, 2 there was a few blood smears on the wall and on 3 the – drips up the stairs going up, again, the 4 cream-colored carpet, which is not ideal. And, 5 so, the top floor was the master bedroom, master 6 suite floor, and two bedrooms also up there. 7 Outside the master bedroom, there was 8 damage to the plaster work on the pillar outside 9 on the wall, blood drips into the master bedroom, 10 across the master bedroom floor. Going into the 11 master bathroom, there was – there was a 12 his-and-her sink and a mirror, large mirror above 13 each of the sinks, that had writing on each of 14 them. Again, one of the bedrooms or both of the 15 bedrooms, I think, had blood on the duvet covers 16 and another lamp was broken. Mr. Depp's guitar 17 was in one of those bedrooms, bloodstained guitar. 18 His iPad was standing up on one of the beds in one 19 of the bedrooms. 20 That's, I mean, that's about the extent 21 of it. 22 Q That's the damage?</p>	<p style="text-align: right;">2421</p> <p>1 house, yes. Mr. Depp and Ms. Heard had done some 2 artwork themselves, yes. But, yes, there were 3 some that came with the house, if you'd like. 4 Q Focusing just on the artwork that came 5 with the house. 6 A Uh-huh. 7 Q Did you observe any damage to any of 8 that? 9 A No. Nothing that I needed to repair or 10 replace. Certainly not. Thank goodness. 11 Q Any other damage that comes to mind? 12 A Just a little blood, a lot of repairs. 13 Just the floors were quite heavy with blood and 14 paint, yeah. 15 Q And in terms of bodily fluids, it was 16 just blood that you observed, no urine or anything 17 else? 18 MR. NADELHAFT: Objection. Leading. 19 THE COURT: I'll sustain. Strike the 20 answer from the record. 21 Q No other damage -- does any other 22 damage come to mind?</p>
<p style="text-align: right;">2420</p> <p>1 A On each level, yeah. 2 Q Whose job was it to clean all that up? 3 A Well, it was mine. It was my 4 responsibility. The house was, essentially, my 5 responsibility. 6 Q So you were familiar -- were you 7 familiar with the damage, generally, throughout 8 the house? 9 A I had a pretty good idea, as I walked 10 around and saw it all, yes. 11 Q Did you observe any damaged phones? 12 A No. 13 Q Did you observe any damage to a wall 14 where a phone might have been ripped off the wall? 15 MR. NADELHAFT: Objection, Your Honor. 16 Leading. 17 THE COURT: All right. Maybe the next 18 one. 19 MR. NADELHAFT: Yeah. 20 Q Was there any artwork in this house, 21 decorating the house? 22 A The owners, they left their art in the</p>	<p style="text-align: right;">2422</p> <p>1 A No. 2 Q Can you take a look at Defendant's 3 Exhibit 375. 4 MR. MONIZ: Which I believe is already 5 in evidence. 6 THE COURT: Yes. 7 MR. MONIZ: And can we publish this to 8 the jury? 9 THE COURT: Okay. 10 Q Mr. King, are you familiar with the 11 image that's on the screen in front of you? 12 A Yeah, that's one of the mirrors I was 13 telling you about in the master bathroom. 14 Q And so, were you involved in cleaning 15 any of this up? 16 A I cleaned both of those mirrors at some 17 point that evening, that night, yes. 18 Q Were you able to tell what was used, or 19 what substance the, I guess, what sort of ink it 20 is that's used on the black writing there? 21 A That was the same oil paint that was on 22 the floor, the parquet floor downstairs, and</p>

<p style="text-align: right;">2423</p> <p>1 various other areas, the same oil paint. 2 Q All right. How about the red writing 3 that says "call Carly Simon. She said it better, 4 babe"? Were you able to tell what was used to 5 make that writing? 6 A Lipstick, I believe. 7 MR. NADELHAFT: Objection. Foundation. 8 Objection. Foundation. 9 MR. MONIZ: He's testified that he was 10 cleaning it up. 11 THE COURT: I'll allow it. Go ahead. 12 A Certainly seemed like lipstick to me. 13 Red lipstick. It was quite waxy. I remember 14 taking that off. It seemed like lipstick. 15 Q Okay. 16 MR. MONIZ: We can take that down. 17 Q Mr. King, about how long were you at 18 the house on that Sunday? 19 A Quite a long time. It actually went 20 into the early hours of Monday morning, so, at 21 least, I got there around 2 in the afternoon of 22 Sunday. I don't think I left there until 2 or</p>	<p style="text-align: right;">2425</p> <p>1 will be the end if I leave. Those sorts of 2 things. And so, it was just – these went over a 3 few hours, those negotiations, if you'd like. And 4 eventually, Ms. Heard agreed that I would fly with 5 her. 6 Q And did you, in fact, fly with her? 7 A I did. On Monday, the 9th. 8 Q Okay. Sticking with Sunday, when you 9 were interacting with her on that Sunday, were 10 you -- how close were you to her? 11 A Very close. You know, like, very 12 close. In front of her. 13 Q And do you recall observing any 14 injuries on Ms. Heard? 15 A No. None whatsoever. 16 Q Did you notice anything unusual about 17 her physically, at all? 18 A No. I mean, she was obviously crying a 19 lot. She had red eyes and – but, no. Otherwise, 20 no. 21 Q So what happens the following day, that 22 Monday, March 9th, I guess it would be, 2015?</p>
<p style="text-align: right;">2424</p> <p>1 3:00 the next morning of the night. 2 Q Over the course of the time that you 3 were there that day, did you have any interactions 4 with Ms. Heard? 5 A Yes. I certainly did. Yes. 6 Q Can you describe those for us, please? 7 A Yeah, not too much, initially. She was 8 very, as I said, quite hysterical and crying a 9 lot, and Jerry Judge was taking care of her, 10 keeping her calm. But later in the evening, it 11 was – it was suggested that Ms. Heard go to a 12 local hotel, to leave the house to go to a local 13 hotel, which then became a suggestion that she go 14 back to LA. And that's when, I think, I started 15 interacting in terms of, at some point, I 16 volunteered to travel with her to LA. 17 Q How did Ms. Heard respond to the 18 suggestion that she leave Los Angeles -- leave for 19 Los Angeles? 20 A She was resistant to both of those 21 suggestions, very resistant, really didn't want to 22 go. She said, I can't leave. I can't leave. It</p>	<p style="text-align: right;">2426</p> <p>1 A Right. So, I mean, it was eventually 2 agreed that I would fly with Ms. Heard. So I had 3 to, at some point, go back to my apartment, drive 4 to my apartment to pick up my passport, which, 5 fondly enough, I hadn't brought with me, and some 6 clothes, you know, a bag to take. So I think I 7 left the house early hours, as I said, two or 8 three, may have been a bit later, a.m. I drove 9 back to my apartment, which was a 30 minutes' 10 drive south, picked up those things. I mean, I 11 didn't know what I was – how long I was going to 12 go for, but I knew I was traveling, so passport, 13 quick shower, pick up a bag of clothes. And then 14 I drove back up to the house. I don't recall 15 exactly what time I arrived there, but I know we 16 had to leave. All the arrangements were being 17 made by the travel agent, and Jerry Judge was 18 liaising with them to make the flight 19 arrangements, which, I believe, was going mid to 20 late morning. So I think we had to leave the 21 house around 7 or 8:00 a.m. that morning, Monday 22 the 9th.</p>

<p style="text-align: right;">2427</p> <p>1 Q And did you travel to the airport with 2 Ms. Heard? 3 A Yes. With -- yes, we were driven. 4 Q How would you describe her demeanor 5 that morning? 6 A Calmed down a fair bit. She was mostly 7 on the phone, to be honest, for pretty much the 8 whole of that car journey, to various people, one 9 of which, I believe, was Mr. Depp. 10 Q Do you recall her saying anything on 11 the ride to the airport about what had happened 12 the night prior? 13 A Nothing really mentioned in that -- as 14 way of an explanation, no. 15 Q What happened when you got to the 16 airport, if anything? 17 A We were running a bit late, I remember 18 that. Luckily, we were traveling first class so 19 the driver knew to pull up to kind of VIP, for 20 want of a better word, VIP checking point, and, 21 so, the car got pretty close to where the desk 22 was. Ms. Heard was still on the phone and so we</p>	<p style="text-align: right;">2429</p> <p>1 said, we were flying first class, which is lovely. 2 She was in the window seat, like, I think, 1A, 1B, 3 window seat. I had aisle seat. And finally, we 4 could both sit down and in way of conversation, it 5 wasn't a great deal, to be honest. I did sort of 6 say, finally, so what happened? And, obviously, 7 referring to the house. And I mean, she didn't 8 give much explanation, if any. She did say, Ben, 9 have you ever been so angry with someone that you 10 just lost it with them? And I sort of said, no, 11 actually. I'm a pretty calm, you know, 12 even-tempered guy. But she did repeat it. She 13 looked pretty incredulous that I hadn't. She 14 repeated it. You mean you've never lost it where 15 somebody -- got so angry with someone that you 16 just lost it with them? I said, not unless you 17 count the time when I was 14 years old and I hit 18 the light switch in my bedroom because I wasn't 19 allowed out that night or something. With a 20 person, no, never. And that was pretty much the 21 end of the conversation. She dropped it then. 22 Q How would you describe her tone when</p>
<p style="text-align: right;">2428</p> <p>1 sat there for a bit with the driver, and Ms. Heard 2 was talking. I don't know who to, at that point. 3 And I was thinking, oh, we need to make this 4 flight, actually, pretty soon because we were 5 already running a bit late. 6 So I decided to go in, maybe I could go 7 in, check in our bags ahead, and then come back 8 and get Ms. Heard and she should be finished by 9 then. Which is what I did. 10 Q Okay. And did you eventually get on 11 the plane? 12 A Eventually, we did. It was a close 13 call, to be honest. 14 Q Once you were on the plane, did you 15 have any conversations with Ms. Heard? 16 A Yes. I mean, not initially, which took 17 some time in the bathroom. She was on the phone, 18 again, to the point where the cabin crew had to 19 sort of tap on the door and say we need to leave 20 now. Everybody needs to sit down. And she did 21 come to sit down, you know, after 10 or 15 minutes 22 in there. And so, eventually, and luckily, as I</p>	<p style="text-align: right;">2430</p> <p>1 she asked those questions of you? 2 A To me? Incredulous, be fair to say. 3 Surprised that I hadn't lost it with somebody. 4 Q Does anything else stand out about that 5 flight? 6 A It was fairly calm. After that, it was 7 calm. I mean, we were both exhausted. I 8 certainly was, and I think -- I can't remember 9 eating either. Just slept most of the flight 10 until, obviously, we landed or close to landing. 11 Q At any point, did you observe anything 12 about Ms. Heard physically on that flight? 13 A Yes, I did. Right. Just before we 14 landed, I noticed some marks on her arm, her left 15 forearm. 16 Q How would you describe those? 17 A Long, kind of uniform, evenly spaced, 18 sort of long, thin, marks. Very uniform, in fact. 19 Q And when did you first notice those? 20 A On the plane towards coming into 21 landing. They were gathering the stuff up. I 22 noticed them then.</p>

<p style="text-align: right;">2431</p> <p>1 Q Okay. What did you do after you landed 2 in Los Angeles? 3 A Once I fired up my phone on landing, I 4 saw the arrangements that we would be picked up by 5 one of Mr. Depp's security personnel, who I think 6 was Travis McGovern -- McGovern -- McGovern. So I 7 made contact with him and he met us in the place 8 that had been arranged. We walked through the, 9 you know, the arrivals lounge and met him at the 10 end of that. Got in the car with him and drove to 11 the Eastern Columbia Building. 12 Q And how did Ms. Heard -- how would you 13 describe Ms. Heard's demeanor in Los Angeles? 14 A Yeah, very calm. I mean, she seemed -- 15 I mean, obviously, a lot calmer from the house, 16 but she was pleasant towards Travis, certainly, in 17 the car. Obviously, they knew each other. She 18 was -- when we got to the building, she was kind 19 enough to show me around the apartment. I'd never 20 been before. She showed me around the penthouse, 21 a little tour. She wrote down some restaurant 22 recommendations because she knew I'd be staying a</p>	<p style="text-align: right;">2433</p> <p>1 Q Did you observe them interacting with 2 each other after they came back to Australia? 3 A Yes, yep. 4 Q And how would you describe their 5 interactions? 6 A Again, initially, the first few days 7 was certainly very pleasant, almost honeymoon 8 like, I would say. They strolled around the 9 grounds a bit and they seemed fine with each 10 other. 11 Q Did you ever observe any arguments 12 after they returned? 13 A Yes. I mean, many. Several more. 14 Yeah. 15 Q And how would you describe those? 16 A Not dissimilar to the London arguments, 17 in terms of the pattern of things. You know, the 18 sort of provocation and the reaction to leave the 19 room, Mr. Depp leaving the room, going to another 20 room, playing his guitar. Seemed to follow the 21 same pattern as that -- as I witnessed those two 22 times in London.</p>
<p style="text-align: right;">2432</p> <p>1 few days probably. And I didn't really know LA 2 that well. So she recommended a few restaurants. 3 And then I left, I said, if you need anything, as 4 usual, as I always did, if you need anything, give 5 me a shout. I'll be staying fairly close by. 6 Just give me a call or a text. 7 Q How long were you in LA? 8 A Less than a week. I think I flew back 9 to Australia on the 14th or 15th. So about 10 five days, six days tops. 11 Q And when you got back to Australia, 12 what were you doing? 13 A Pretty much putting the house back 14 together and repairing all the damage with the 15 help of professional contractors, vendors I 16 brought in, and just getting the house back as it 17 was originally. 18 Q At some point, did Mr. Depp and 19 Ms. Heard return to Australia? 20 A Yes, they did. 21 Q Were you there when they returned? 22 A Yes.</p>	<p style="text-align: right;">2434</p> <p>1 Q All right. 2 MR. MONIZ: Nothing further. 3 THE COURT: All right. 4 Cross-examination. 5 EXAMINATION BY COUNSEL FOR THE DEFENDANT AND 6 COUNTERCLAIM PLAINTIFF 7 BY MR. NADELHAFT: 8 Q Good afternoon. 9 A Good afternoon. 10 Q So, to understand your testimony, is it 11 your testimony that Amber and Mr. Depp arrived 12 together in Australia in February of 2015? 13 A Initially, together, I don't think so. 14 I think Mr. Depp arrived ahead of Ms. Heard, 15 actually. 16 Q Mr. Depp arrived first, correct? 17 A I think so, yes. 18 Q Isn't it true that Ms. Heard, Amber 19 didn't arrive until March 5th, 2015, to Australia? 20 A I can't remember the date she arrived, 21 to be honest. 22 Q But she could have arrived March 5th,</p>

2435	1 2015; isn't that true? 2 MR. MONIZ: Objection. Foundation. 3 Speculation. 4 THE COURT: I'll allow it. 5 You can answer it. 6 A Sorry, what was the question? 7 Q Ms. Heard could have arrived on 8 March 5th, 2015, correct? 9 A It's possible, I suppose. 10 Q And isn't it true, then, that you 11 didn't see any arguments between Ms. Heard and 12 Mr. Depp before the injury that occurred to 13 Mr. Depp's finger, in Australia? 14 A I saw them argue. 15 Q You saw them argue when they came back. 16 When they came back in April, correct? 17 A I saw them argue in April and through 18 most of the months they were there, yes. 19 Q But you can't recall any arguments in 20 February or March of 2015 between Ms. Heard and 21 Mr. Depp, correct? 22 A Specific days, not necessarily, no.	2437	1 Q It was in a piece of paper. But, 2 again, like someone had wrapped it up; is that 3 right? 4 A I don't know. It was within that 5 scrunched up piece of paper. Kitchen paper, 6 tissue. 7 Q It was in kitchen paper; is that right? 8 A Tissue paper. It was white with a lot 9 of blood on it. 10 Q So, like a paper towel? 11 A Like a piece of kitchen towel. 12 Q When you say "kitchen towel," even 13 though we both speak English, I may say it a 14 little different. Like a paper towel? 15 A Like kitchen, paper, towel, like a 16 tissue. 17 Q Was that sort of paper towel in the 18 kitchen at the house at the time? 19 A Yes, in both areas of the kitchen and 20 the bar. 21 Q Okay. You said you were in Australia 22 starting in February of 2015, correct?
2436	1 Q All right. So you don't know, you 2 can't say that there were any arguments before you 3 came to the house on March 8th, 2015, correct? 4 A I think there were. I mean... 5 Q Excuse me? Say that again. 6 A I think there were. 7 Q But you don't even know when she 8 arrived, correct? 9 A Specifically, the day? Not 10 necessarily, no. 11 Q Okay. And you said when you arrived at 12 the house on March 8th, when you eventually found 13 the finger, it was wrapped in paper; is that 14 right? 15 A Wrapped. I mean, it was loosely 16 wrapped. The paper was open by that point, the 17 blood had dried up and it was sitting in this sort 18 of nest of this paper. 19 Q So like someone had put their finger in 20 a piece of paper? 21 A I don't know. I mean, it was in that 22 piece of paper.	2438	1 A Correct. I arrived on the 4th of 2 February. 3 Q And Mr. Depp arrived sometime after 4 that; is that right? 5 A Correct. 6 Q Did you see Marilyn Manson while you 7 were there? 8 A No, I didn't. 9 Q You don't know if Mr. Depp was with 10 Marilyn Manson in late February, early March, 11 2015? 12 MR. MONIZ: Objection. Foundation. 13 Speculation. Relevance. 14 MR. NADELHAFT: I'm just asking if he 15 saw him. He said he saw him every day, so I was 16 asking if he saw -- 17 THE COURT: I'll allow the question. 18 If you can answer it, that's fine. 19 A Marilyn Manson didn't come to the 20 house. I didn't see him at any point. 21 Q Do you know if Mr. Depp left to be with 22 Marilyn Manson?

2439	1 A I don't know. I didn't always know 2 where he was going when he went out. It was 3 either to work or security would go with him. I 4 wouldn't generally go. In fact, I don't think I 5 went out with him at all in Australia. 6 Q You didn't go out with Mr. Depp at all 7 when he was in Australia, correct? 8 A I don't recall it. I saw him on set 9 once or twice, yeah. 10 Q So, you don't know what Mr. Depp was 11 doing in Australia unless you saw him on set or at 12 the house; is that right? 13 A I saw him at the house, yes, every day. 14 Q But you don't know what Mr. Depp was 15 doing when he left the house, correct? 16 A Generally, going to work on Pirates of 17 the Caribbean 5, yes. 18 Q Were you with him? 19 A No, the security was with him. I had 20 to liaison with them for when he would go, when he 21 would come back for the driver, et cetera. 22 Q But you weren't there when Mr. Depp	2441	1 Speculation. 2 A I didn't -- 3 THE COURT: Sir, there's an objection. 4 Q Do you recall testifying to that in the 5 U.K.? 6 THE COURT: I'll overrule the 7 objection. 8 You can answer it. 9 A What, sir? 10 Q That the filming of Pirates of the 11 Caribbean 5 continued filming on April 21st, 2015. 12 A I wasn't involved in the filming 13 schedule. I don't know when it resumed, to be 14 honest. I knew Mr. Depp came back to resume 15 filming for sure. 16 Q You didn't live with Mr. Depp in his 17 house in Australia, correct? 18 A Live with? No, I wasn't a resident 19 there. 20 Q Now, when you arrived at the house, you 21 saw a significant amount of damage, correct? 22 A Yes. The course of -- yeah, after I
2440	1 left the house, correct? 2 A Generally, I didn't go, didn't leave 3 the house with Mr. Depp on those days, no. 4 Q And I just want to make sure -- want to 5 be clear, there were two kind of periods that 6 Mr. Depp was in Australia in 2015, right? 7 A Sorry. Say again. 8 Q Mr. Depp was in Australia from sometime 9 in February 2015 until about March 8th, March 9th, 10 when he injured his finger; is that right? 11 A Correct, yeah. 12 Q And then Mr. Depp left Australia too, 13 correct? 14 A At some point, he flew to LA, yes. 15 Q And Mr. Depp returned to Australia on 16 April 21st, right, 2015? 17 A Again, that sounds about that time. I 18 don't know the specific date. I don't recall. 19 Q And the filming of Pirates of the 20 Caribbean 5 continued filming on April 21st, 21 correct? 22 MR. MONIZ: Objection. Foundation.	2442	1 arrived, yes. 2 Q And the scene was chaos, correct? 3 A Chaos? I mean, there was a fair amount 4 of damage. 5 Q The house was wrecked? 6 A There was a lot of damage in the house, 7 yes. 8 Q And the house was not in a good state, 9 correct? 10 MR. MONIZ: Asked and answered. 11 THE COURT: He's got to object first 12 and then -- you can have your objection, 13 Mr. Moniz. Then it helps. 14 MR. MONIZ: Objection. 15 THE COURT: Okay. I'll overrule the 16 objection. 17 Go ahead. Next question. 18 Q And you said there was glass on the 19 floor, correct? 20 A In a few areas, mainly, predominantly 21 in the bar, yeah, down in the lower ground floor, 22 correct.

2443	1 Q And there was blood on the walls, 2 correct? 3 A In various places, there was blood on 4 the floor, blood on the walls. 5 Q And there was blood on the walls 6 throughout the three stories of the house; isn't 7 that right? 8 A No. I wouldn't say that was the extent 9 of it. There was smears up the staircase going up 10 to the master from the main level. There was 11 smears and drips on the carpet. 12 Q So there were smears from the master 13 level up to the bedroom area -- I mean, from the 14 main level up to the bedroom area; is that right? 15 A Up to the third floor, yes. 16 Q Like someone had walked from the main 17 floor up to the bedroom floor, correct? 18 A There was blood going up the stairs, up 19 the steps, on the staircase, and some on the wall, 20 you know, smears, where he might have done that, 21 yeah. 22 Q As if someone was walking from the main	2445	1 A Some lamps, a couple of lamps, yes. 2 Q Okay. And there were bottles of 3 alcohol in and out of the fridge, correct? 4 A Sorry, what do you mean? 5 Q Did you see bottles of alcohol in and 6 out of the fridge? 7 A Yes. I mean, I don't completely 8 understand what you mean. 9 Q You saw that, correct? 10 A There were alcohol bottles, yes. In 11 the fridge, I mean, there may have been a bottle 12 of wine. I don't know. 13 Q And the floors were ruined, correct? 14 A Ruined? I mean, there was a lot of 15 damage on the floor down in the bar area, and the 16 staircase and on the main floor area, the wooden 17 parquet floor, correct. 18 Q And the floors were going to have to be 19 sanded, correct? 20 A I eventually got them sanded, yes. 21 Q And it took -- you were there, I think 22 you testified it took you about 12 to 13 hours in
2444	1 level up to the master bedroom, correct? Is that 2 what the blood was like? 3 A Yeah, maybe. I don't know. 4 Q Okay. 5 A Or down. 6 Q Up or down. From the main level to the 7 third floor, correct? 8 A Correct, yes. 9 Q And you said the sofas were damaged; is 10 that right? 11 A One sofa in that sitting room, which 12 was just off the kitchen, it was quite an open 13 plan thing, so you have that. There was a sofa 14 with a large TV on a -- a wall-mounted TV in front 15 of that sofa. 16 Q And the sofa was on the main level, 17 correct? 18 A By the main kitchen, correct. 19 Q Where the sofa was damaged, that was 20 with what? 21 A Blood. 22 Q And lights were damaged?	2446	1 the house cleaning up, correct? 2 A Correct. 3 Q And you said that there was -- is it 4 your testimony that you didn't see any of the 5 paintings damaged? 6 A The existing paintings from the owners 7 from the house, no. None of them were damaged. 8 Q You didn't see any paintings with a 9 painting of a penis drawn on it? 10 A I did not. And thankfully that was 11 something I didn't have to replace or anything 12 else. 13 Q Do you know if anyone else saw that? 14 MR. MONIZ: Objection. Speculation. 15 A I mean, I would have seen it. 16 THE COURT: Wait, there's an objection. 17 Just stop. 18 THE WITNESS: I'm sorry. 19 THE COURT: If you stand, we can see 20 you better when you do that. 21 MR. MONIZ: Understood. 22 THE COURT: I'll sustain the objection.

2447	1 Next question. 2 MR. NADELHAFT: Okay. 3 Q You said that Jerry Judge was at the 4 house, correct? 5 A Correct. 6 Q And he's the head of Mr. Depp's 7 security? 8 A Correct. 9 Q And Dr. Kipper was at the house? 10 A Yes, he was. 11 Q And Debbie Lloyd was at the house as 12 well, correct? 13 A Yes, she was. 14 Q Now, you understood that Mr. Judge saw 15 scratches on Ms. Heard on March 8th, correct? 16 MR. MONIZ: Objection. Hearsay. 17 Speculation. Foundation. 18 THE COURT: I'll sustain the objection. 19 Next question. 20 Q Did you have -- the cleaning lady was 21 going to be coming to the house, correct? 22 A The housekeeper?	2449	1 principals weren't there, Mr. Depp wasn't there, 2 Ms. Heard was obviously with me at that point, so 3 I said they didn't need to come to the house. 4 Q Isn't it true that you told Mr. Judge 5 that you thought you could get the cleaning lady 6 to swear to silence about what the house looks 7 like? 8 MR. MONIZ: Objection. Hearsay. 9 MR. NADELHAFT: His own statement. 10 THE COURT: His own statement. I'll 11 allow it. 12 Q Isn't it true that you told Mr. Judge 13 that you thought you could get the cleaning lady 14 to swear to silence about what the house looked 15 like? 16 A I think I probably made a comment 17 about, you know, I should just come back and deal 18 with this myself, if that's what you mean, and 19 just kept cleaning up. 20 Q And make sure that she wouldn't say 21 anything, correct? 22 A I don't know. We trusted -- I trusted
2448	1 Q Yes, the housekeeper. 2 A The resident housekeeper, yes, she was 3 going to be. I mean, yes, she was employed 4 through the week. Again, she wasn't there on 5 weekends. 6 Q There was concern about the cleaning 7 lady coming to the house and seeing everything 8 that was in the house, correct? 9 MR. MONIZ: Objection. Speculation. 10 Foundation. Vague. 11 THE COURT: I'll allow it. He can 12 answer it. 13 You can answer it, sir. 14 THE WITNESS: Thank you. 15 A Sorry. 16 Q There was concern about the cleaning 17 lady coming to the house and seeing all the damage 18 that had been done, correct? 19 A I know that when I left to fly to LA 20 with Ms. Heard, I told both the chef and the 21 housekeeper they didn't need to be coming to the 22 house because Ms. Heard, essentially, the	2450	1 her and the chef anyway. They were good team 2 members. 3 Q As the house manager, part of your job 4 is to -- you said you work with high profile 5 people, correct? 6 A High profile, high net worth, I 7 believe, is what I actually said. 8 Q Would you agree that part of your job 9 is to keep things discreet for your client? 10 A Of course, that's part of my job, 11 discretion. 12 Q And Mr. Depp was your client? 13 A I worked on an assignment on these 14 occasions, yes. But I was self-employed at the 15 time, yeah. 16 Q But on March 8th, 2015, in Australia, 17 Mr. Depp was your client, correct? 18 A Correct, essentially. Yep. 19 Q Okay. 20 A And Ms. Heard. Both of them, the 21 principals. 22 Q Who paid -- and do you know how -- who

<p>2451</p> <p>1 paid your -- for your services? 2 A As I said before, it was paid through 3 Disney, who were making the Pirates of the 4 Caribbean, that production company, which I 5 believe was called Herschel. 6 Q Okay. 7 MR. NADELHAFT: Can we put up 8 Defendant's Exhibit 377, which is already in 9 evidence. 10 THE COURT: All right. You can put it 11 on -- that's there. 12 Q Mr. King, do you see Exhibit 377 in 13 front of you? 14 A I do, yes. 15 Q And do you recognize this as a 16 lampshade that was in the house in Australia on 17 March 8th, 2015? 18 A Yes. It was, I believe, one of the 19 lampshades that was missing from one of the lamps. 20 Q Okay. And you saw -- did you see this 21 painting on the lampshade? 22 A I did, yeah. As part of my walk</p>	<p>2453</p> <p>1 A Correct. There were two mirrors in the 2 bathroom, above each sink. 3 Q And this was on the top floor, correct? 4 A The master bathroom, essentially. 5 Q The master bathroom, just so I'm clear, 6 was on the top floor, right? 7 A Top floor, correct. 8 Q And this painting says "Starring Billy 9 Bob"; is that correct, is that what you recall? 10 A Yeah, I don't know his writing. 11 Q And was this in -- the writing, was it 12 in paint? 13 A I believe it is the same paint, the oil 14 paint that was used on the other mirror that we 15 saw earlier. 16 Q Okay. And did you take this picture? 17 A Again, possible. I haven't seen the 18 metadata, but, yes, probably. 19 MR. NADELHAFT: And let's put back up 20 Defendant's Exhibit 375. 21 Q This writing was also in the master 22 bathroom, correct?</p>
<p>2452</p> <p>1 around. 2 Q And what floor was the lampshade on? 3 A This was on -- where the art studio 4 was, on that main level. 5 Q So on the main level, okay. 6 A Yes. Excuse me. 7 Q And was this -- did you notice it was 8 dark paint that was on the lampshade? 9 A Certainly looked like it, yes. 10 Q Did you take this picture? 11 A I believe I did. Yeah, without seeing 12 that metadata. 13 Q Okay. 14 A I believe I did. 15 MR. NADELHAFT: Can we put up 16 Defendant's Exhibit 374, please. 17 Q And you recognize Defendant's 18 Exhibit 374 as a mirror that was in the house in 19 Australia on March 8th, 2015, correct? 20 A Yes, I do. 21 Q And this mirror was in the bathroom, 22 correct?</p>	<p>2454</p> <p>1 A Correct, yes. 2 Q Okay. And can you tell if the black 3 paint was on top of the red or under the red? 4 A I didn't really analyze it, to be 5 honest. I just knew I was going to have to clean 6 it up at some point. 7 Q Right. Your whole point was cleaning 8 up the house, correct? 9 A Correct. 10 Q And you don't know who wrote what on 11 this, on the mirror, correct? 12 A No. I know that one was oil paint and 13 the other red writing was lipstick. 14 Q And lipstick, you're not even sure of 15 that, you just saw it was something sticky; is 16 that right? 17 A I'm pretty sure. Waxy. 18 Q Waxy? 19 A Lipstick-like, same as the oil paint 20 was oil paint-like. 21 Q Okay. Did you see paint -- did you 22 see, also, any writing in blood?</p>

2455	1 A Writing? No, not necessarily. 2 Q No? Okay. 3 Now, did you help -- when Ms. Heard was 4 leaving to go back to LA, you were with her, 5 correct? 6 A Correct. 7 Q Did you help her pack? 8 A I think I may have done that, at that 9 point. Yeah, I think I did. 10 Q Did you see -- weren't Ms. Heard's 11 clothes ruined? 12 A I didn't see any ruined clothes. 13 Q There wasn't paint on her clothes? 14 A Not that I could see. Not so much. 15 Yeah, not at that point of packing. I mean... 16 Q There was paint in the tub, correct? 17 A Say it again, sir. 18 Q There was paint in the tub in the 19 bathroom, correct? 20 A I don't recall that. 21 Q You don't recall one way or the other? 22 A I don't recall it being paint in the	2457	1 Q Photos of the house. 2 A By whom? 3 Q Did you take any pictures of the house? 4 A I took a few, yeah. I mean, that -- 5 yes. 6 Q And did you take pictures other than 7 the three that we saw? 8 A I think I probably did as I was going 9 around. 10 Q Do you know who you gave those pictures 11 to? 12 A No. 13 Q Do you know what you took the photos 14 with? 15 A My phone. 16 Q And who would you have sent those 17 photos to? 18 A I didn't send them to anybody at that 19 point. 20 Q You just kept them? 21 A Yes. 22 Q Did you show the photos to anyone?
2456	1 tub. 2 Q And it's your testimony there was no 3 paint or blood on Ms. Heard's clothes; is that 4 what you're saying? 5 MR. MONIZ: Asked and answered. 6 A It is. 7 THE COURT: I'll allow it. 8 Q Now, you said you were in charge of the 9 cleanup, correct? 10 A Yes, it was my responsibility, the 11 house was. 12 Q And you were working with Mr. Judge in 13 cleaning up the house; is that right? 14 A The night, the day that I arrived 15 there? 16 Q Yes. 17 A Mr. Judge did help me at some point, 18 yes, sweeping up glass, et cetera. 19 Q And were there -- was there photos 20 taken of more than the three pictures you've been 21 shown? 22 A Photos?	2458	1 A No. 2 Q Do you still have the photos? 3 A Yes. 4 Q Where are they, on your phone still? 5 A They're on one of my devices, yes. 6 Q Okay. Did you take a photo of the 7 vodka bottle that you said was broken? 8 A Yes. 9 Q And you have that photo? 10 A Yes. 11 Q Okay. And you didn't -- you didn't 12 give that to anybody? 13 A There have been a few photos. I can 14 show it to you now, if you want. 15 Q How many photos did you have on your 16 phone? 17 A I don't remember the number. Probably 18 more than ten. 19 Q Did anyone ever ask you for the photos? 20 A Several of them, yes. I was -- yes. 21 Q Did you give them to the people who 22 asked?

2459	1 A Some of them, yes. 2 Q Not all of them? 3 A I don't recall how many. 4 Q Who asked you for the photos? 5 A I was involved in a case in London a 6 couple of years ago. 7 Q Did you give the photo of the vodka 8 bottle to the people that you were involved in the 9 case in London? 10 MR. MONIZ: Objection. Relevance, Your 11 Honor. 12 THE COURT: Overruled. I'll allow it. 13 A Say it again, sorry. 14 Q Did you give a photo of the vodka 15 bottle to the people you were working with in 16 London? 17 A I don't recall what photos I sent, gave 18 them. 19 Q So did you take photos of the walls? 20 A The walls, certainly the smears of the 21 blood and the damage, the plaster damage, yes. 22 Q So you took photos of the walls with	2461	1 about \$75,000 to clean up the damage; isn't that 2 right? 3 A The exact cost, I think, what I 4 calculated at the time, you know, after all the 5 vendors been and done there, I think it was about 6 50,000, I seem to recall. 7 Q Okay. Now, you said you flew back to 8 Australia with Ms. Heard, correct? 9 A I didn't fly back with Ms. Heard. 10 Q You flew back to LA from Australia, 11 thank you, with Ms. Heard, correct? 12 A Correct. 13 Q And you were asleep for most of the 14 flight, correct? 15 A A lot of it. I think it was a 14-hour 16 flight, so I think we both slept for quite a lot 17 of it. 18 Q You were exhausted from the 13 hours 19 you were working on the house, right? 20 A Correct. 21 Q And your testimony was that Ms. Heard 22 said to you, have you ever been so angry with
2460	1 blood on it; is that right? 2 A Yes. 3 Q And you took photos of the plaster, 4 right, that was damaged? 5 A At the end of the bar, in the bar, 6 behind the bar, by the sink, yeah. 7 Q And did you take photos of the 8 ping-pong table that you said was broken? 9 A Yes, as part of the bar area, I'm sure. 10 Q Did you take photos of -- there was a 11 glass table that was broken too, correct? 12 A A glass table? I don't recall a glass 13 table. 14 Q Okay. Did you take photos of all the 15 damage that was around the house? 16 A Probably most of it, yeah. 17 Q And the only time you gave those photos 18 to anyone, you're saying, was in the U.K. case a 19 couple years back? 20 A I've never shared them with anybody 21 else, yes. 22 Q Okay. And it costs between -- it cost	2462	1 someone that you just lost it, correct? 2 A After I asked sort of what happened. 3 Q But you didn't inquire as to what she 4 was referring to, right? 5 A I mean, by what happened, it was pretty 6 clear what I was referring to. 7 Q Let me ask you again. You did not 8 inquire as to what she was referring to, did you? 9 A With her answer? 10 Q Correct. 11 A She didn't inquire as to my reason for 12 asking, but it was pretty obvious, to both of us, 13 what I was asking and what her reply was 14 regarding. 15 THE COURT: Yes, that's fine, sir. 16 Thank you. 17 THE WITNESS: Thank you. 18 MR. NADELHAFT: Uh-huh. 19 Q Mr. King, you testified on behalf of 20 Mr. Depp in the U.K., correct? 21 A Correct. 22 Q Okay. And you provided two witness

2463

1 statements, correct?
2 **A Correct.**
3 Q And then you provided testimony in
4 court, correct?
5 **A Correct.**
6 Q Okay. And if you take a look at
7 page 1103 of your testimony. Do you see how the
8 pages go in fours?
9 **A Yeah.**
10 Q Do you see it's actually on the --
11 **A Bottom right.**
12 Q Bottom right.
13 Do you see that?
14 **A Yeah, got it.**
15 Q If you actually look at -- you see,
16 starting at the bottom of 1102, there's -- this
17 was a statement when you said you did not -- you
18 say Ms. Heard asked you, have you ever been so
19 angry with anyone that you lost it? Your answer,
20 that's correct. And you specifically remember
21 that, do you? Yes. You said it never happened to
22 you?

2464

1 "ANSWER: That is correct.
2 "QUESTION: She did not. I mean, it
3 was -- if it was said, nothing was said about who
4 she was talking about, was it?
5 "ANSWER: She was asking me a question.
6 "QUESTION: She was asking you a
7 question?
8 "ANSWER: Yes.
9 "QUESTION: You did not inquire as to
10 what she was referring to, did you?
11 "I do not recall asking. I know she
12 was asking for a question, and I gave her an
13 answer."
14 Do you see?
15 **A Yes.**
16 Q That's the testimony you gave in the
17 U.K. two years ago, correct?
18 **A Yes.**
19 Q Okay. So you don't know what -- and
20 you don't know what Ms. Heard was talking about
21 when she made that statement, correct? You don't
22 know if she was inquiring -- that she was making

2465

1 that statement about Mr. Depp, right?
2 **A Like I said, I asked the question, what
3 happened, referring to the house. And she gave me
4 that answer. So I think we were both -- it was
5 pretty clear, to both of us, what we were talking
6 about. I mean, at that point.**
7 Q And then you went to sleep, and then
8 you had the flight the rest of the time?
9 **A Sometime after that.**
10 Q Okay.
11 **A Uh-huh.**
12 Q Now, and you said you saw Ms. Heard
13 with cuts on her arm; is that right, on the
14 flight?
15 **A That's right. Toward the end of the
16 flight, yeah.**
17 Q All right.
18 MR. NADELHAFT: If we could put up
19 376G.
20 Q Do you recognize this picture?
21 **A I've not seen this picture before.**
22 Q Were these the cuts? Did you see cuts

2466

1 like this on Ms. Heard?
2 **A Is that Ms. Heard?**
3 MR. NADELHAFT: Why don't we put up
4 376C.
5 Q Do you recognize the person in that
6 picture?
7 **A That's Ms. Heard.**
8 Q All right. And did you see cuts like
9 that, which are on her left arm?
10 **A Similar to that. Long, like I
11 described earlier, long, thin, cuts. Pretty
12 uniform cuts.**
13 Q These were the cuts -- it was -- the
14 cuts were like this on her kind of wrist, forearm
15 area; is that right?
16 **A I don't know what the date of this
17 photograph is, but they looked pretty uniform,
18 like they do here, yes.**
19 Q Okay.
20 MR. NADELHAFT: I would like to enter
21 376C into evidence.
22 THE COURT: Any objection?

2467	1 MR. MONIZ: No objection. 2 THE COURT: Okay. 376C in evidence. 3 MR. NADELHAFT: And can we put back up 4 376G. 5 Q Seeing 376C, is this consistent with 6 the scratches -- on 376G, are these consistent 7 with the scratches that you saw on Ms. Heard? 8 A I didn't see a date. Is that the same 9 time? Is that the same date? I mean -- 10 Q My question is, are the scratches 11 similar to what you saw on Ms. Heard? 12 A These are uniform, kind of long, thin 13 scratches, yes. 14 MR. NADELHAFT: I would like to enter 15 376G into evidence. 16 THE COURT: Any objection? 17 MR. MONIZ: Foundation. He hasn't 18 authenticated the document through this witness. 19 MR. NADELHAFT: I'm just asking if 20 pictures are consistent. 21 THE COURT: I'll allow it. 376G into 22 evidence.	2469	1 MR. NADELHAFT: I'm asking what he 2 wasn't told. 3 THE COURT: I'll sustain the objection. 4 Next question. 5 Q You didn't know what could cause damage 6 to Mr. Depp's hand while you were there on 7 March 8th, correct? 8 A Dr. Kipper told me he sustained an 9 injury on one of his fingers. 10 MR. NADELHAFT: Your Honor, objection. 11 Hearsay. 12 THE COURT: Well, you asked the 13 question. 14 MR. NADELHAFT: Okay. 15 Q You said he sustained an injury to his 16 finger? 17 A Yes. 18 Q But you don't know what caused the 19 injury to his finger? 20 A One of his fingers. 21 Q But you don't know how his finger was 22 injured, correct?
2468	1 MR. NADELHAFT: And can you publish it, 2 please? 3 THE COURT: It is. 4 MR. NADELHAFT: Thank you. 5 Q Now, you were in the house, you said, 6 for 12 to 13 hours on March 8th, 2015, correct? 7 A Correct. Going into March 9th, 2015. 8 Q Okay. And you spoke to Mr. Judge when 9 you were in the house, correct? 10 A Yeah, I had interaction with Judge, 11 yes. 12 Q And you had interaction with Dr. Kipper 13 when you were in the house, correct? 14 A Correct. 15 Q And you had interaction with Debbie 16 Lloyd when you were in the house, correct? 17 A Yes, briefly. 18 Q Okay. And isn't it true that in the 19 entire time you were there, you were not informed 20 as to what caused damage to Mr. Depp's hand on -- 21 finger on March 8th? 22 MR. MONIZ: Objection. Hearsay.	2470	1 A I don't think anybody mentioned it to 2 me at that time. 3 Q Right. No one mentioned it to you at 4 that time, right? 5 A (Indiscernible.) 6 MR. MONIZ: Same objection, Your Honor. 7 Hearsay. 8 THE COURT: That's okay. I'll allow 9 the question. 10 Next Question. He answered it. 11 Q You understand there was a phone in the 12 house that was recording during the cleanup, 13 correct? 14 A Sorry, I didn't hear all of that. 15 Q Did you come to understand that there 16 was a phone in the house that was recording as 17 people were cleaning up? 18 A At that time, no. 19 Q But you now know that there was a phone 20 that was recording people as they were cleaning 21 up, correct? 22 MR. MONIZ: Objection. Foundation.

2471	1 Hearsay. 2 MR. NADELHAFT: I'm not asking for a 3 particular statement. 4 THE COURT: That's fine. I'll allow 5 it, if he knows. 6 A I believe that came up somewhere later 7 on. At that time, I wasn't aware. I believe I 8 became aware of it later, yes. 9 Q Okay. 10 MR. NADELHAFT: I would like to put up 11 Defendant's 378. It's a recording. I want to 12 play a couple of times, 12:07 through 13:19. 13 THE COURT: Is that the only segment 14 you wish to have? 15 MR. NADELHAFT: And then I would also 16 use, I would also like to play 19:51 through 17 21:38. 18 THE COURT: Is this going to be used 19 again or is this -- 20 MR. NADELHAFT: I think it would be A. 21 THE COURT: Okay. 378A. Any objection 22 to 378A?	2473	1 THE COURT: You would have to lay a 2 foundation and Mr. Judge is no longer with us, 3 so... 4 MR. NADELHAFT: It's been testified to, 5 20 years, Mr. Judge, I think, actually, Mr. King 6 testified that he was -- 7 MR. MONIZ: Your Honor, even if we can 8 get around hearsay on this -- 9 MR. NADELHAFT: And it's also present 10 impression as well. 11 MR. MONIZ: Your Honor, even if he can 12 get around hearsay on this, there's no foundation 13 for Mr. Judge's knowledge. He's not able to 14 testify. What's the foundation for even hearing 15 his voice? 16 MR. NADELHAFT: I can ask if it's his 17 voice. 18 MR. MONIZ: Regardless, there's no 19 foundation for Mr. Judge's knowledge, and it's 20 still hearsay. 21 MR. NADELHAFT: And then on page 9, 22 there's Mr. King --
2472	1 MR. MONIZ: Yes, Your Honor, we do have 2 an objection. I believe this is a recording that 3 has the voices of people other than Ms. Heard and 4 Mr. Depp, and on that basis, it's hearsay. 5 THE COURT: Okay. 6 MR. MONIZ: Unless I'm incorrect about 7 which document we're talking about. 8 MR. NADELHAFT: Can we approach? 9 THE COURT: Sure. 10 (Sidebar.) 11 THE COURT: Transcript. 12 MR. NADELHAFT: Correct but it -- 13 THE COURT: The highlighted parts are 14 the ones you want to play? 15 MR. NADELHAFT: Yeah, highlighted parts 16 are the ones I want to play. It's on page 5, 19. 17 THE COURT: Sure. 18 MR. MONIZ: Thank you, Your Honor. 19 Who's talking here? 20 MR. NADELHAFT: This is a statement 21 from Mr. Judge. And is evidence from an agent of 22 Mr. Depp.	2474	1 MR. MONIZ: Can I see your -- I'm 2 sorry. 3 THE COURT: Page 9. 4 MR. MONIZ: Who is J? 5 THE COURT: That's -- 6 MR. MONIZ: Oh, Jerry Judge. 7 I mean, Your Honor, this is all -- 8 MR. NADELHAFT: There's a question 9 about what's happening at the time. It's not 10 talking about -- 11 THE COURT: I'll sustain the objection. 12 It's not coming in. 13 MR. NADELHAFT: Can I ask -- so you're 14 saying this is all hearsay, I just want to make 15 sure? 16 THE COURT: It's hearsay. Mr. Judge 17 is, obviously, deceased, so we can't lay a 18 foundation. 19 MR. NADELHAFT: It's also a statement 20 that has an interest of a party person. 21 THE COURT: That's Mr. Judge's 22 statement.

<p>2475</p> <p>1 MR. NADELHAFT: Okay. 2 THE COURT: No. 3 MR. NADELHAFT: Okay. Your Honor, I do 4 want to -- I don't want to make you upset, but I 5 do want to, for the record, I want to ask about 6 another recording. I understand your ruling is 7 going to be with Mr. Judge. 8 THE COURT: Okay. So I'll sustain the 9 same, for the record. I'll sustain the objection. 10 MR. NADELHAFT: So it's clear, it would 11 be Exhibit 380. 12 THE COURT: 380? 13 MR. NADELHAFT: Yeah. 14 THE COURT: Okay. 15 MR. NADELHAFT: So you're going to 16 sustain that as hearsay; is that right? 17 THE COURT: Any other objection other 18 than foundation? 19 MR. MONIZ: Hearsay, foundation, I 20 think that covers it, Your Honor. 21 THE COURT: Okay. Thank you. 22 (Open court.)</p>	<p>2477</p> <p>1 think so, no. 2 Q You didn't give them all to Mr. Depp 3 and his counsel? 4 A I don't believe I gave them all the 5 photos. 6 Q Why not? 7 A Because there are a decent amount of 8 them. I mean -- 9 Q So you picked and chose what photos you 10 were going to give to Mr. Depp and his counsel? 11 A I gave an amount of photos to them. 12 Q Do you know how many photos you gave to 13 Mr. Depp and his counsel? 14 A I don't know precisely, no. 15 Q Could you give an estimate as to how 16 many photos you gave? 17 A I really can't. You know, an amount, I 18 don't recall how many. 19 Q More than three? 20 A Yes. 21 Q More than ten? 22 A Possibly more than ten, yeah, maybe.</p>
<p>2476</p> <p>1 BY MR. NADELHAFT: 2 Q Excuse me, sorry about that. 3 Going back to the photos that you took, 4 for a moment, of that damage in the house. 5 Do you recall giving that testimony? 6 A Yes. 7 Q Okay. Did Mr. Depp ask you for the 8 photos? 9 A No. 10 Q Did you give the photos to counsel for 11 Mr. Depp? 12 A Some of them, yes. Yeah. 13 Q Did you withhold any photos from 14 Mr. Depp or his counsel? 15 A I didn't withhold any photos from 16 anybody. I didn't withhold. 17 Q Did you give all the photos you have on 18 your phone to Mr. Depp and his counsel? 19 A Not all the photos on my phone. 20 Q All of the photos of the damage that 21 occurred on March 8th, 2015? 22 A Probably not all of them. I don't</p>	<p>2478</p> <p>1 Q Between 10 and 20? 2 MR. MONIZ: Objection. Speculation. 3 THE COURT: Overruled. I'll allow it. 4 Q Do you know? 5 A Sorry. 6 Q She overruled. 7 A Oh, okay. Possibly more than ten, 8 yeah. 9 Q But somewhere between 10 and 20; is 10 that right? 11 A Possibly. I honestly don't know. 12 Q Could it be more than 20? 13 A I don't think so. 14 Q Did Mr. Depp's counsel ask for all the 15 photos? 16 A I don't recall. 17 Q You don't recall, one way or the other, 18 what they asked for? 19 A I gave them some photos. I don't 20 recall how many or how many were asked for, 21 requested. 22 Q And those were requested in 2020?</p>

2479	<p>1 A Correct. Prior to -- 2 Q Prior to the U.K. trial? 3 A That, yeah. 4 Q Did they ask for them in this case? 5 A I believe I supplied some for this case 6 also, yeah. 7 Q You supplied photos for this case to 8 Mr. Depp's counsel? 9 A I believe I did. 10 Q Okay. And was that about the -- 11 between 10 and 20 photos that you're talking 12 about? 13 A I don't remember how many for this. 14 Q But it was the same amount of photos 15 that you gave to Mr. Depp's counsel in the U.K.? 16 A I don't know if it was the same amount. 17 I don't recall. 18 Q Did Mr. Depp's counsel in this case ask 19 for all the photos you had of the damage of 20 March 8th, 2015? 21 A All of the photos? I don't think they 22 requested all of the photos.</p>	2481	<p>1 were asking for all the -- were asking for photos 2 from Australia from March 8th, 2015; is that 3 right? 4 A They requested them at some point, some 5 of them. 6 Q And you provided -- that's when you 7 provided the 10 to 20 photos; is that right? 8 A A number of photos, correct. 9 Q And, then, was there separate counsel 10 that asked you for the photos in this case? 11 A Yes. 12 Q There was? 13 A Yeah. It was essentially the same -- 14 Q Who was it that asked you for photos in 15 this case? 16 A I don't recall a name specifically. 17 Q Was it a man or a woman? 18 A I -- just part of the team. I don't 19 recall. 20 Q Okay. And when did they make that 21 request? 22 A When? I don't know a date. I don't</p>
2480	<p>1 Q They didn't ask for all the photos you 2 had of that damage? 3 A I don't know if they requested them 4 all. 5 Q Was it Mr. Waldman who asked you for 6 the photos? 7 A Originally, I don't remember who, 8 called Schillings. 9 Q Did Mr. Waldman ever ask you for the 10 photos? 11 A I don't know if he asked me 12 specifically. He was part of that team, I assume, 13 so... 14 Q And you spoke to Mr. Waldman; is that 15 right? 16 A I did a couple of years ago, yeah. 17 Q And he was part of the team that was 18 asking for the evidence you had of what occurred 19 in Australia in 2015; is that right? 20 A He was part of that team, as I 21 understood it, yep. 22 Q And as part of that team, he and others</p>	2482	<p>1 know specifically. 2 Q Do you know what year? 3 A This year, last year. I mean, prior to 4 this, obviously. 5 Q So it could have been in 2022 that they 6 asked you for the photos? 7 A I think it was prior to that. I don't 8 recall. 9 Q So maybe late 2021 or early 2022; is 10 that what you're saying? 11 A I honestly don't recall which part of 12 the year. 13 Q But either 2021 or 2022; is that right? 14 A I will imagine that's probably correct. 15 Q Okay. And you gave them some of the 16 photos you had? 17 A As I just said, yes. 18 Q But not all of them? 19 A Correct. 20 Q So do you have more than 10 to 20 21 photos on your phone, of the damage that occurred 22 in Australia?</p>

<p style="text-align: right;">2483</p> <p>1 A Again, I don't recall the amount. 2 Q But you have a larger amount on your 3 phone than what you provided to Mr. Depp's team? 4 MR. MONIZ: Objection, Your Honor. 5 Asked and answered. Cumulative. 6 THE COURT: I'll sustain the objection 7 as asked and answered. 8 Q Going to London for a couple minutes. 9 You didn't live at the house in London, correct? 10 A I didn't live there, correct. 11 Q Do you know if Ms. Heard had friends 12 over to the house in London? 13 A She did. They came to stay, yes. 14 Q And they stayed for -- they stayed from 15 September 9th through September 22nd, 2014, 16 correct? 17 A I don't know the duration, but that's 18 possible. 19 Q Okay. And they were staying, they were 20 literally staying at the house, correct? 21 A They were accommodated at the house, 22 correct.</p>	<p style="text-align: right;">2485</p> <p>1 A I would say more. 2 Q But you don't know one way or the 3 other, right? 4 A I don't recall the count, but certainly 5 more than when there was just two of them in the 6 house because seven extra people or five people. 7 Q You don't know the count? 8 A Precisely, no, I don't. 9 Q Do you know how much time Ms. Heard was 10 in London with Mr. Depp not with her friends? 11 A A fair amount of that time. 12 Q Well, what do -- 13 A I don't recall days, no. I don't 14 recall. 15 Q So they were there for a month, 16 correct. 17 A Thereabouts, yes. 18 Q When I say "they," Ms. Heard and 19 Mr. Depp were in London for about a month, right? 20 A Correct. Roundabout a month. 21 Q Wasn't it true that for about two to 22 three weeks, Ms. Heard's friends were also staying</p>
<p style="text-align: right;">2484</p> <p>1 Q Right. So you don't know who was 2 drinking the bottles of wine that were brought 3 into the house, correct? 4 A At which point? What do you mean? 5 Q When Ms. Heard's friends were there, 6 you don't know who was drinking the wine? 7 A They were all enjoying the wine. 8 Q They were all drinking the wine? 9 A I took care of them, as I would take 10 care of any guests that came into any house. 11 Q Wasn't it five to seven guests that 12 were at the house with Ms. Heard? 13 A I don't remember the number. Sounds 14 about right. 15 Q And then at the end of the night, there 16 was one or two bottles of wine finished, right? 17 A When Mr. Depp and Ms. Heard were there 18 on their own, there was certainly that amount, 19 yes. 20 Q But you don't know how many bottles 21 were there when it was Ms. Heard and her friends, 22 correct?</p>	<p style="text-align: right;">2486</p> <p>1 in London? 2 A I don't think two or three weeks. I 3 don't recall, but I don't think it was that long. 4 Q You don't know one way or the other, 5 right? 6 A I don't think it was that long. 7 Q You don't have anything to base that 8 on, right, just what your memory is saying? 9 A Correct. 10 Q Okay. And you don't know what happened 11 in London when you weren't there, correct? 12 A You mean after I had left of an 13 evening? 14 Q Yeah. 15 A Usually the chef was there still when I 16 left each evening, Russell, who would take care of 17 dinner, and he'd leave later that -- each night. 18 Q And then after the chef left, you don't 19 know what happened in the house, right? 20 A I wasn't there. 21 Q Right. And you don't know, for 22 certain, whether Mr. Depp drank wine or not in</p>

2487	1 London, right? 2 A I don't believe so. There's usually – 3 when it was just the two of them in the house, 4 there was usually only one glass in the morning, 5 either on the kitchen sink or on the bedside stand 6 in the master bedroom. 7 Q But you don't know who drank from that 8 glass when you weren't there, right? 9 A When I wasn't there, correct. But when 10 I left the house, I had already poured Ms. Heard a 11 glass of wine before I left, inherently. 12 Q But once you left, you don't know 13 whether Mr. Depp drank wine or not, correct? 14 A I wasn't there after I left. 15 Q Okay. And you don't know what started 16 the fights you talked about in London, correct, 17 other than that one you said you heard about her 18 hand? 19 A The second one that I described, I was 20 in the vicinity. I heard the first comment. That 21 was the start of that argument. 22 Q And you don't actually know if there	2489	1 other. 2 Q You never saw Ms. Heard be violent at 3 any time, right? 4 A I didn't see her be violent, depending 5 on your – 6 Q Let me show you your witness statement, 7 where you said you never saw Ms. Heard be violent 8 at any time. 9 A Violence? Yes, I didn't see violence, 10 per se. 11 Q Okay. 12 MR. NADELHAFT: Thank you. I have 13 nothing further. 14 THE COURT: All right. Redirect. 15 THE WITNESS: Thank you. 16 EXAMINATION BY COUNSEL FOR THE PLAINTIFF AND 17 COUNTERCLAIM DEFENDANT 18 BY MR. MONIZ: 19 Q Mr. King, have you ever been employed 20 by Mr. Depp? 21 A No. 22 Q So, in each of these situations where
2488	1 was an argument before what you heard, right? 2 A Of that evening? I didn't hear another 3 one. 4 Q Okay. 5 A Put it that way. It started in that 6 room, as I described earlier. 7 Q And you don't know what happened in 8 Australia, also, between March 5th and March 8th, 9 correct? 10 A The 6th. I left Friday the 6th, was 11 when I left for the weekend. 12 Q To between Friday the 6th and when you 13 got to the house on March 8th, you don't know what 14 happened? 15 A I wasn't there. 16 Q Okay. And you never saw Ms. Heard be 17 violent at any time, right? 18 A Sorry, say again. 19 Q You never saw Ms. Heard be violent at 20 any time, correct? 21 A Beyond finger prodding and violent, I 22 didn't see either of them be violent towards each	2490	1 you've been around Mr. Depp, you've always been 2 employed by somebody else? 3 MR. NADELHAFT: Objection. Leading. 4 A Correct. 5 THE COURT: All right. I'll sustain as 6 to leading. 7 Strike the answer. 8 Next question. 9 Q Are you based anywhere other than the 10 U.K.? 11 MR. NADELHAFT: Objection. Leading. 12 Q Where do you live? 13 A I live in Central London. 14 Q Have you ever lived anywhere else? 15 MR. NADELHAFT: Objection. Leading. 16 THE COURT: Sustain the objection. 17 Next question. 18 MR. MONIZ: Okay. 19 Q We heard some discussion on cross about 20 photos, which I suspect you remember. 21 Why did you take the photos of the 22 property damage in Australia?

2491

1 A As I do a lot of my jobs and various
2 assignments and jobs through the years, I take
3 photos as points of reference and for whatever
4 reason. I mean, if I'm packing suitcases up and
5 they're going to be in transit and I'm not with
6 the suitcases, I'll take a picture of contents and
7 when I send stuff so I know what's going and
8 what's gone. I take pictures as points of
9 reference. I sometimes take pictures of table
10 settings that I've done or, which I knew I could
11 use later on as reference.
12 Q Were the photos of property damages in
13 Australia the first photos that you had taken in
14 the course of working with Mr. Depp and Ms. Heard?
15 MR. NADELHAFT: Objection. Leading.
16 THE COURT: All right. I'll sustain as
17 to leading.
18 Next question.
19 Q Had you ever taken photos before?
20 A Yes.
21 Q What kinds of things had you taken
22 photos of?

2492

1 A In London, reference points and dinner
2 table settings. Sometimes Mr. Depp would write
3 notes for Ms. Heard, leave notes on the sort of
4 kitchen table when he left for work. I believe I
5 took pictures of those. They were, you know,
6 there. Things like that. Just setups of -- once
7 I've set up houses, it's always good to take
8 photos of rooms so I can cross-reference later on,
9 if I need to.
10 Q Did Ms. Heard or her counsel ever ask
11 you for photos of -- any of the photos you took in
12 Australia?
13 A No.
14 MR. NADELHAFT: Objection. Leading.
15 THE COURT: I'll sustain as to leading.
16 Next question.
17 MR. MONIZ: Can I see Plaintiff's
18 Exhibit 159. And I think this is a multipage
19 document. Can you scroll through, about three
20 pages here.
21 Q Mr. King, do you recognize this
22 document?

2493

1 A Yes. That's the floor plan of the
2 house in Australia.
3 Q And do you recall, on
4 cross-examination, you were asked to kind of
5 describe where some of the property damage was?
6 A Yes.
7 Q So, right now, on the screen in front
8 of you --
9 A Yep.
10 Q -- which floor would you say this is?
11 A This is the top floor with the master
12 suite and two other bedrooms.
13 Q Okay. And I believe counsel asked you
14 if there was blood in one of the bathrooms, or one
15 of the bathtubs.
16 Do you recall that?
17 A Yes, they did ask that.
18 Q Would that have been on this floor?
19 A I think that was referring to the
20 master tub. That's what he said.
21 Q Okay. So can you mark on the screen
22 where that would have been?

2494

1 A The master tub? It's over here. Can I
2 just dot it out?
3 Q You can just dot it, yes.
4 A Okay. So that looks like the master
5 tub to me.
6 Q And just to clarify, did you recall
7 seeing any blood or damage there?
8 A In the tub? No.
9 Q Okay. Can you mark for us, on the
10 screen, where you did see the damage that was
11 discussed on cross?
12 A The mirrors and -- can I dab on here
13 again?
14 Q Sure.
15 A So these are the sinks. The two
16 mirrors were above the mirrors -- above each sink.
17 Q Okay.
18 MR. MONIZ: Can we scroll up to the
19 page prior.
20 Q And can you point out for us, on this
21 page -- well, first of all, which floor is this?
22 A This is the main level floor.

<p style="text-align: right;">2495</p> <p>1 Essentially, the second floor, if you want. 2 Q Okay. And can you point out for us, 3 here on this map, which of the -- where the 4 property damage was? 5 A Yes. How many dabs am I allowed? 6 Around here, kitchen area. This was the TV, the 7 wall-mounted TV. 8 Oh, I've run out of dabs. 9 MR. MONIZ: I apologize. Actually, 10 Your Honor. Can we move this into evidence? 11 THE COURT: Any objection? 12 MR. NADELHAFT: No objection. 13 MR. MONIZ: Can we publish it to the 14 jury? 15 THE COURT: Okay. 16 Q So, Mr. King, I apologize for 17 interrupting you. You were just pointing out 18 where on -- I think this is the second floor. 19 A Essentially the main level, yes. 20 Q So other than these three dots, do you 21 recall any other places where there was damage? 22 A Yes. Where it says "family," family</p>	<p style="text-align: right;">2497</p> <p>1 Q Okay. And any other significant 2 property damage that you want to point out on 3 this, on this floor? 4 A Yes. As I said, this was the -- can I 5 dab again? Yeah. So, that was the most part of 6 the broken glass, that's where the Stolichnaya 7 bottle was, below that bar, by the barstools. 8 There were three barstools that you could sit at 9 there. On this back wall here, there was plaster 10 damage on -- over here, above the sink, or to the 11 side of the sink, was more plaster damage on the 12 walls behind the bar. That mirror was cracked, 13 broken. Ping-pong table was around there, 14 collapsed on the floor. And around those three 15 dots there, I'm going to put another one, that was 16 the spillages, as well, that smelled like alcohol 17 to me, the puddles of alcohol. 18 Q Is that it? 19 A I mean, that was the most part of the 20 damage around that area in front of the bar, 21 especially. As I said, there were blood drips 22 around that white cream-colored tile floor in the</p>
<p style="text-align: right;">2496</p> <p>1 room, there was -- where the TV was wall mounted, 2 on that wall in between family and lounge. The 3 sofa was, approximately, where you've got the red 4 square -- red rectangle now, facing towards the 5 TV. The lounge is -- sorry, too quick. The 6 lounge was, essentially, the art studio, and the 7 bedrooms, over to the left there, where the lamp, 8 damaged lamp and shade, blood on the duvet, et 9 cetera, that I described. 10 Q Okay. 11 MR. MONIZ: And then let's go to the 12 first page. 13 Q And which floor is this? 14 A This is the lower ground floor. 15 Q Okay. And can you point out for us -- 16 did you find the finger on this floor? 17 A Correct. 18 Q Can you point out to us where you found 19 the finger? 20 A Yes, I can. Right here. Maybe here. 21 It's the end of the bar. It was on the tiled 22 floor below that end of the bar.</p>	<p style="text-align: right;">2498</p> <p>1 games room. And this is the staircase down, is 2 this side that the chip was out of the stone step. 3 And, if I can get another dab in there, right 4 about in the center of that bar, the chunk out of 5 the side of the counter, bar top. 6 Q Okay. How many exits are there on the 7 ground floor? 8 A Well, exits, all of these were. And 9 all of these. My office was off over here. I 10 think you can just see it says "study," big, 11 glass, sliding door. The gym had an exit up here 12 (indicating). This went into the garage. There 13 was a button you could press for the automatic 14 doors to come up. The laundry area, which was 15 right here, this is actually an exit out into the 16 yard, essentially. The gym, all of those rooms 17 had an exit. 18 Q Okay. Other than Mr. Depp's counsel, 19 did anybody else ever ask to see your photos? 20 MR. NADELHAFT: Objection. Leading. 21 THE COURT: I'll allow it. 22 A No.</p>

Transcript of Jury Trial - Day 9
Conducted on April 25, 2022

79 (2499 to
2502)

2499	1 MR. MONIZ: All right. Nothing 2 further, Your Honor. 3 THE COURT: All right. Is this witness 4 subject to recall? 5 MS. BREDEHOFT: Your Honor, we have an 6 issue we would like to approach on. 7 MR. MONIZ: Subject to recall. 8 THE COURT: All right. 9 So, since you're subject to recall, 10 it's important that you do not discuss your 11 testimony with anybody and do not pay attention to 12 the trial, and don't watch anything about the 13 trial, okay? 14 THE WITNESS: Of course. Thank you. 15 THE COURT: All right. You can step 16 down, sir. 17 MS. BREDEHOFT: Your Honor, may we 18 approach? 19 (Sidebar.) 20 MS. BREDEHOFT: Your Honor, there are 21 two court orders requiring them to produce all the 22 photos, and they did not produce those. I would	2501	1 them tonight, turn them over tonight to 2 Ms. Bredehoft, so she can have them. And he's 3 subject to recall, so if we need call him back at 4 any time, we can call him back. I'll give you 5 leeway to have questions, obviously, you can waive 6 it today. 7 MR. MONIZ: And just as a point of 8 clarification, Your Honor, this is not a witness 9 to -- it is a U.K. resident not subject to 10 subpoena. 11 THE COURT: I know, but he said he 12 handed over 10 to 20 photos. It may be prior 13 counsel, I don't know, but still. This resolves 14 the issue. I think we can take care of it from 15 there, okay? 16 MR. CHEW: Thank you, Your Honor. 17 THE COURT: Ladies and gentlemen, that 18 comes to end of our day, so we're going to excuse 19 you for the evening. Again, do not do any outside 20 research and do not talk to anybody, and we'll see 21 you tomorrow morning. Have a great evening. 22 Thank you.
2500	1 like to be able to get the Court to order Mr. King 2 to turn them over. 3 THE COURT: Okay. 4 MS. BREDEHOFT: If not, we're asking 5 for spoliation instruction. I just want to give 6 the Court that. 7 MR. MONIZ: First of all, Your Honor, 8 this is obviously not somebody who's employed by 9 Mr. Depp. 10 THE COURT: Understand. The question 11 is, are those photos in your custody? 12 MR. MONIZ: They're not in our custody, 13 possession, or control, but we have no objection 14 to him turning -- 15 THE COURT: Well, we'll get them before 16 he leaves. Get everything that's on his phone, 17 and we'll turn it all over. 18 MR. MONIZ: Those are after the close 19 of discovery, obviously. But, yeah, I mean, if he 20 has photos that he hasn't produced, then, yeah, 21 that's fine. 22 THE COURT: Sure. Why don't you get	2502	1 (Whereupon, the jury exited the 2 courtroom and the following proceedings took 3 place.) 4 THE COURT: All right. I just have one 5 housekeeping matter. We're going through the 6 exhibits you gave me this morning. Thank you, 7 again, for that. One of them was 485, and I had 8 in my notes that it was 485A, just the first page, 9 but you gave me all eight pages. 10 Have you all agreed that all eight 11 pages of this document come in, or should I give 12 485 back and you can try again to give it back to 13 me tomorrow? 14 MR. ROTTENBORN: Sure, Your Honor. 15 THE COURT: Okay. I'll give that back 16 to you, and we'll see what happens tomorrow. 17 And we're going to start with a remote 18 witness tomorrow; is that going to be your first 19 witness? 20 MR. CHEW: Yes, Your Honor. 21 THE COURT: Make sure she's signed on 22 by 9:40 so we can have it all set up for 10:00

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2503

1 start, okay?
2 MR. CHEW: We will, Your Honor. Thank
3 you, Your Honor.
4 THE BAILIFF: All rise.
5 (Whereupon, the trial was recessed at
6 5:35 p.m. to reconvene at 10:00 a.m., Tuesday,
7 April 26, 2022.)
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2504

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 26th day
14 of April, 2022.
15 My Commission Expires: September 30, 2024
16
17
18 *Judith E. Bellinger*
19 _____
20 NOTARY PUBLIC IN AND FOR
21 THE COMMONWEALTH OF VIRGINIA
22