

33	<p>1 that resulted in conflict and arguments.</p> <p>2 Q And did Mr. Depp have any -- in working</p> <p>3 with Amber, did Mr. Depp have any distrust of</p> <p>4 Amber?</p> <p>5 MR. PRESIADO: Objection, lacks</p> <p>6 foundation, calls for speculation.</p> <p>7 A Yes. That's my understanding.</p> <p>8 Q Was -- did -- in working with Amber, did</p> <p>9 Mr. Depp ever express to Amber any jealousy about</p> <p>10 Amber performing and working in certain sex scenes</p> <p>11 in movies?</p> <p>12 MR. PRESIADO: Objection, lacks</p> <p>13 foundation, calls for speculation.</p> <p>14 A That -- I believe that that's true.</p> <p>15 Although, it was -- it was more general than that.</p> <p>16 It wasn't just sex scenes.</p> <p>17 Q Okay. And was Mr. Depp ever concerned</p> <p>18 about the clothes that Amber would wear?</p> <p>19 MR. PRESIADO: Objection, lacks</p> <p>20 foundation, calls for speculation.</p> <p>21 A I don't recall her ever mentioning that.</p> <p>22 Q Okay. In working with Amber, do you know</p>	35	<p>1 Q Do you know who else -- in working with</p> <p>2 Amber, do you know who else would be with Mr. Depp</p> <p>3 at that studio?</p> <p>4 MR. PRESIADO: Objection, vague and</p> <p>5 ambiguous as to time, lacks foundation, calls for</p> <p>6 speculation.</p> <p>7 A There were other people in his kind of</p> <p>8 music group that he spent time with there. I</p> <p>9 don't know the names.</p> <p>10 Q Do you know -- if in working with Amber,</p> <p>11 do you know if Mr. Depp ever spent time away from</p> <p>12 her while he was with Marilyn Manson?</p> <p>13 MR. PRESIADO: Objection, lacks</p> <p>14 foundation, calls for speculation.</p> <p>15 A I do recall, now that you mention his</p> <p>16 name, yes.</p> <p>17 Q And do you recall, in working with Amber,</p> <p>18 that there were concerns that Mr. Depp did drugs</p> <p>19 with Mr. Marilyn Manson?</p> <p>20 MR. PRESIADO: Objection, lacks</p> <p>21 foundation, calls for speculation.</p> <p>22 A Yes.</p>
34	<p>1 if Mr. Depp had a separate apartment or studio</p> <p>2 from where he lived with Amber?</p> <p>3 A Yes, he did.</p> <p>4 Q What was your understanding of what</p> <p>5 Mr. Depp would do at that studio?</p> <p>6 MR. PRESIADO: Objection, vague and</p> <p>7 ambiguous, lacks foundation.</p> <p>8 A I think he practiced, you know, his music</p> <p>9 there.</p> <p>10 Q Would Mr. Depp stay at his studio for days</p> <p>11 without going back and being with Amber?</p> <p>12 MR. PRESIADO: Objection, lacks</p> <p>13 foundation, calls for speculation, vague and</p> <p>14 ambiguous.</p> <p>15 A Yes, she did indicate that.</p> <p>16 Q All right. And from working with Amber,</p> <p>17 was it your understanding that Mr. Depp would do</p> <p>18 drugs and alcohol while at that studio away from</p> <p>19 Amber?</p> <p>20 MR. PRESIADO: Objection, lacks</p> <p>21 foundation, calls for speculation.</p> <p>22 A Yes.</p>	36	<p>1 Q In working with Amber, was it your</p> <p>2 understanding that she was trying to make the</p> <p>3 relationship with Mr. Depp work?</p> <p>4 A Yes.</p> <p>5 Q In treating Amber, did you ever get the</p> <p>6 sense that she acquired Mr. Depp for success and</p> <p>7 fame?</p> <p>8 MR. PRESIADO: Objection, lacks</p> <p>9 foundation, calls for speculation.</p> <p>10 A No. I thought she genuinely cared for</p> <p>11 him.</p> <p>12 Q Now, at the time Amber had been referred</p> <p>13 to you, did you understand that Dr. Kipper had</p> <p>14 been working with Mr. Depp in the Bahamas, on</p> <p>15 Mr. Depp's private island?</p> <p>16 A I knew that he went with them, when they</p> <p>17 got married, to that island, yes.</p> <p>18 Q Did you ever understand that Mr. Depp was</p> <p>19 in the Bahamas working on trying to detox off of</p> <p>20 drugs?</p> <p>21 MR. PRESIADO: Objection, lacks</p> <p>22 foundation, calls for speculation, vague and</p>

<p>1 ambiguous.</p> <p>2 A No, I don't recall that. I just know that</p> <p>3 they went to the island when they got married.</p> <p>4 Q Okay. Did you ever have an understanding</p> <p>5 that Mr. Depp was trying to detox off of drugs</p> <p>6 with --</p> <p>7 MR. PRESIADO: Objection, lacks</p> <p>8 foundation, calls for speculation.</p> <p>9 A That was my understanding, yes.</p> <p>10 Q Do you know what drugs Mr. Depp was trying</p> <p>11 to detox off of with Dr. Kipper?</p> <p>12 MR. PRESIADO: Objection, assumes fact not</p> <p>13 in evidence, calls for speculation, lack of</p> <p>14 foundation.</p> <p>15 A Not specifically. I know that -- I know</p> <p>16 that he was drinking a lot. I don't know the</p> <p>17 variety of drugs that he was using.</p> <p>18 Q Was your under- -- did you have any</p> <p>19 understanding that Mr. Depp ever took cocaine</p> <p>20 while he was in his relationship with Amber?</p> <p>21 MR. PRESIADO: Objection, lacks</p> <p>22 foundation, calls for speculation.</p>	<p>37</p>	<p>1 larger.</p> <p>2 THE TECHNICIAN: (Complies.)</p> <p>3 THE WITNESS: Okay.</p> <p>4 BY MR. NADELHAFT:</p> <p>5 Q Okay. Dr. Cowan, I'm showing you what's</p> <p>6 been marked as Cowan Exhibit 1. It's actually an</p> <p>7 e-mail from Dr. Kipper, to Christi Dembrowski, on</p> <p>8 October 18th, 2014. It's called, "Update."</p> <p>9 And I just want to point you to a couple</p> <p>10 of things. First of all, do you know who</p> <p>11 Christi Dembrowski?</p> <p>12 A No.</p> <p>13 Q And Dr. Kipper writes, "Christi, I'm</p> <p>14 alerting you to some concerning issue that arose</p> <p>15 last night after we spoke. Amber called us at</p> <p>16 around midnight, asking that we come over to their</p> <p>17 house. They evidently had a fight, she claims he</p> <p>18 pushed her, and she asked him to leave the house."</p> <p>19 Did you ever have an understanding, in</p> <p>20 working with Amber, that Mr. Depp had pushed Amber</p> <p>21 in the Bahamas?</p> <p>22 MR. PRESIADO: Objection, calls for</p>	<p>39</p>
<p>1 A She indicated that, yeah.</p> <p>2 Q Was it your understanding that Mr. Depp</p> <p>3 ever took opioids when he was in his relationship</p> <p>4 with Amber?</p> <p>5 MR. PRESIADO: Objection, lacks</p> <p>6 foundation, calls for speculation.</p> <p>7 A I don't recall her saying he was taking</p> <p>8 opioids.</p> <p>9 MR. NADELHAFT: Brennan, can you put up</p> <p>10 Heard 1, and we'll mark this as Cowan 1.</p> <p>11 THE TECHNICIAN: Sure. One moment.</p> <p>12 BY MR. NADELHAFT:</p> <p>13 Q And, Dr. Cowan, I'm going to be showing</p> <p>14 you documents throughout this deposition, as I'm</p> <p>15 sure Mr. Depp's counsel will as well. They should</p> <p>16 come up on your screen, and hopefully you'll be</p> <p>17 able to look through them, and we can make it</p> <p>18 larger for you as well.</p> <p>19 (Whereupon, the above-referenced document</p> <p>20 was marked as Exhibit No. 1.)</p> <p>21 (Document displayed.)</p> <p>22 THE WITNESS: Okay. Can you make that</p>	<p>38</p>	<p>1 speculation, lacks foundation.</p> <p>2 A Not in the Bahamas, no.</p> <p>3 Q Where did -- in what locations, did you</p> <p>4 understand that Mr. Depp had pushed Amber?</p> <p>5 MR. PRESIADO: Objection, assumes facts</p> <p>6 not in evidence, lacks foundation, calls for</p> <p>7 speculation.</p> <p>8 A I recall Amber telling me it was sometime</p> <p>9 in December, before they were to -- I think it was</p> <p>10 before they went to the island for Christmas, I</p> <p>11 think they were going to the island, and they had</p> <p>12 a big fight and that he pushed her, pushed her</p> <p>13 down.</p> <p>14 Q Do you recall anything else that Amber</p> <p>15 told you Mr. Depp did to her, in December, before</p> <p>16 they went to the island?</p> <p>17 A I got a text from her, that I didn't pick</p> <p>18 up until the next morning, that they had had a big</p> <p>19 fight, and that he had -- I don't know exactly</p> <p>20 what happened, but she said she had been hurt, but</p> <p>21 she was safe and she had -- I think she had some</p> <p>22 medical staff with her. And this was where they</p>	<p>40</p>

<p style="text-align: right;">41</p> <p>1 lived downtown, and so that there were other 2 people around. 3 And then I saw her the next day after 4 that. We discussed it. 5 Q Okay. 6 MR. NADELHAFT: And, Brennan, why don't 7 you put up Kipper -- Heard 31. 8 (Whereupon, the above-referenced document 9 was marked as Exhibit No. 2.) 10 (Document displayed.) 11 MR. NADELHAFT: And we can make these 12 bigger. 13 BY MR. NADELHAFT: 14 Q Dr. Cowan, I'm showing you what's been 15 marked as Cowan Exhibit 2. You produced text 16 messages in response to a subpoena in this case, 17 right? 18 A Yes, I did. 19 Q Okay. And, as you said, you would, in 20 your treatment of Amber, would text -- would 21 exchange text messages with Amber; is that right? 22 A Yes. Largely over, you know, scheduling</p>	<p style="text-align: right;">43</p> <p>1 Well, what did you understand Amber to 2 mean when she said, "Johnny did a number on me 3 tonight"? 4 MR. PRESIADO: Objection, lacks 5 foundation, calls for speculation. 6 A Well, "did a number on me," and, 7 "concussion," you know, suggested that they had a 8 fight where she was hurt. 9 Q Okay. So Amber reported to you 10 that Mr. Depp was physical to her; is that right? 11 MR. PRESIADO: Objection, lacks 12 foundation, calls for speculation. 13 A Yes. 14 Q Okay. And if we go to the next page, you 15 wrote, "So sorry, Amber. Come over today at 11a" 16 -- a.m., or "a," right? 17 A Yes. 18 Q So when you received that text from Amber, 19 that, "Johnny did a number," on her, you believed 20 Amber, correct? 21 A Yeah. I had no reason not to believe her. 22 Q Did you believe Amber had any ulterior</p>
<p style="text-align: right;">42</p> <p>1 issues. 2 Q Okay. And these text messages, you 3 produced them off of your telephone -- off of your 4 cell phone; is that right? 5 A Yes. 6 Q Okay. And if we go down a little bit 7 here, to December 16th, 2015 -- 8 MR. NADELHAFT: Right there. 9 Q -- is the gray, as your understanding, 10 Amber, a message from Amber? 11 A Yeah. 12 Q Okay. And she wrote, "Johnny did a number 13 on me tonight. I'm safe and my support tonight -- 14 I'm safe and with my support tonight, but I need 15 some real help. Can I come tomorrow? I called 16 earlier because I thought I had a concussion and 17 didn't know if I should have called police, but I 18 have a nurse close to me - and Rocky and her have 19 been here for me. Can I see you tomorrow?" 20 You received that text from Amber? 21 A I did. 22 Q And if we can go down.</p>	<p style="text-align: right;">44</p> <p>1 motive for informing you that Mr. Depp did a 2 "number" on her? 3 MR. PRESIADO: Objection, lack of 4 foundation, calls for speculation. 5 A No. 6 Q And, then, Amber wrote, "Connell, sorry 7 haven't called you because Rocky came over last 8 night. Then dealt with security and called nurse 9 for medical help and went down to sleep. Today 10 has been filled with work (I'm shooting a Late 11 Show appearance today with two black eyes). In 12 short? I need your help. But will have time 13 tomorrow to get it. Can you please, please make 14 time for me?" 15 You received that message, correct? 16 A Correct. 17 Q And then she wrote, "Johnny beat me up 18 pretty good last night." 19 You received that text message, correct? 20 A Yes. 21 Q And what did you understand Amber to mean 22 when she wrote, "Johnny beat me up pretty good</p>

<p>1 last night"?</p> <p>2 MR. PRESIADO: Objection, calls for 3 speculation, lacks foundation.</p> <p>4 A Well, that she was referring to the fight 5 that she had mentioned in an earlier text.</p> <p>6 Q And, in receiving this text message from 7 Amber, you thought her message to be credible, 8 correct?</p> <p>9 MR. PRESIADO: Objection, lacks 10 foundation, calls for speculation, vague and 11 ambiguous.</p> <p>12 A I took it at face value, yes.</p> <p>13 Q And then Amber wrote to you, "He's using 14 again."</p> <p>15 Do you see that?</p> <p>16 A Yes, I do.</p> <p>17 Q And, "He's using again," you understood 18 that to mean Mr. Depp was using again, correct?</p> <p>19 A Yeah.</p> <p>20 MR. PRESIADO: Objection, leading, calls 21 for speculation, lack of foundation.</p> <p>22 BY MR. NADELHAFT:</p>	<p>45</p>	<p>1 A That's correct.</p> <p>2 Q And what was your understanding Amber was 3 referring to in those text messages?</p> <p>4 MR. PRESIADO: Objection, calls for 5 speculation, lacks foundation.</p> <p>6 A My understanding was that, exactly what 7 she was saying. He was going to leave and he was 8 going to go to the studio.</p> <p>9 Q Okay. You wrote, "All I can tell you, 10 Amber, is that it's important to trust what you 11 know to be safe and healthy for you and to 12 distrust any of those feelings that come from fear 13 and insecurity. Whatever you decide, whatever you 14 do, make sure you try and let it come from 15 strength and not weakness. I know you don't want 16 him to go, but staying and using leads to what?"</p> <p>17 You wrote that text?</p> <p>18 A I did.</p> <p>19 Q Okay. And where you wrote -- what did you 20 mean where you said, "It's important to trust what 21 you know to be safe and healthy for you."</p> <p>22 A Well, "safe and healthy," was -- really</p>	<p>47</p>
<p>1 Q And what was your understanding that 2 Mr. Depp was "using"?</p> <p>3 MR. PRESIADO: Same objections.</p> <p>4 A Probably, cocaine.</p> <p>5 Q And, if you keep scrolling down, there's 6 messages about -- back and forth about trying to 7 schedule a time with you; do you see that?</p> <p>8 A Yes.</p> <p>9 Q Okay. And if you keep going down --</p> <p>10 MR. NADELHAFT: Move up for one second.</p> <p>11 Yeah, keep going down. I'm sorry. Keep 12 going down.</p> <p>13 Keep going.</p> <p>14 Okay. Right there.</p> <p>15 BY MR. NADELHAFT:</p> <p>16 Q On December 20th, Amber wrote, "I don't 17 feel strong enough. I want to be, just don't feel 18 it. He wants to say bye to me. He came over to 19 grab some things, I just don't want him to leave. 20 I don't know what to do."</p> <p>21 You received those text messages from 22 Amber, right?</p>	<p>46</p>	<p>1 referred to her taking care of herself. "Safe and 2 healthy" -- look, I thought the relationship was a 3 toxic relationship. And so, "safe and healthy," 4 really, was not to be in that relationship. I 5 didn't think it was a safe and healthy place for 6 her to be.</p> <p>7 Q Were you concerned, at all, for Amber's 8 safety?</p> <p>9 MR. PRESIADO: Objection, vague and 10 ambiguous.</p> <p>11 A I was concerned more for her mental 12 well-being than her physical well-being, but, yes. 13 I mean, they're combined elements. It was a very 14 unhealthy relationship from, I think from the very 15 beginning. And what I wanted Amber to do was to 16 trust herself, to believe in herself that she was 17 just fine on her own, and she didn't need to be in 18 a relationship that was not nurturing, and what I 19 considered to be healthy and constructive.</p> <p>20 Q And you were concerned both for Amber's 21 mental well-being and her physical well-being; is 22 that right?</p>	<p>48</p>

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<p>1 MR. PRESIADO: Objection, asked and 2 answered, misstates testimony. 3 A Do I answer? 4 Q Yeah, you can answer. 5 A I was concerned, you know, for them both. 6 As I said, I was concerned, you know, more for her 7 emotional and mental well-being, but I understood 8 that, you know, they also got into some -- 9 something physical, and that was a danger too. 10 Q And where you wrote -- you wrote, "Staying 11 and using leads to what?" Where you wrote, "I 12 know you don't want him to go, but staying and 13 using leads to what?" 14 What were you referring to there? 15 A More emotional and, possibly, physical 16 turmoil and danger. 17 Q Okay. And is it -- in working with 18 patients, is it uncommon for someone to be in a 19 relationship and be abused, but not want to leave 20 their romantic partner? 21 MR. PRESIADO: Objection, vague and 22 ambiguous, calls for speculation, over broad.</p>	<p>1 MR. NADELHAFT: Okay. And can we put up 2 Heard 32. 3 (Whereupon, the above-referenced document 4 was marked as Exhibit No. 3.) 5 (Document displayed.) 6 BY MR. NADELHAFT: 7 Q Dr. Cowan, in response to a subpoena, you 8 produced your, "Psychotherapy Progress Notes"; is 9 that right? 10 A Yes. What these are, these are really 11 process notes. I mean, I wasn't writing these to 12 document -- I mean, I wasn't anticipating this 13 process that we're going through today, so these 14 are really notes more to myself, in terms of 15 what's going on and what I think needs to be 16 addressed. 17 Q Right. So you're not taking notes, like 18 the court reporter is, and writing down everything 19 that someone says; is that right? 20 A No. 21 Q Okay. And you keep these notes in the 22 ordinary course of business?</p>
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<p>1 A Yes, that's a common dynamic. 2 Q Okay. And even during this time, in 3 December of 2015, was it your understanding that 4 Amber was trying to save her relationship and help 5 Mr. Depp? 6 A Yes, it was. 7 MR. PRESIADO: Objection, calls for 8 speculation, lacks foundation. 9 BY MR. NADELHAFT: 10 Q And, then, at the bottom of this, Cowan 11 Exhibit 2, you wrote, on December 22nd, 2015, 12 "Amber, please let me know how you are and what's 13 going on. Concerned that I haven't heard from 14 you." 15 What were you worried about? 16 A Well, I'm just trying to look at the 17 timeline. I'm not sure exactly what I meant -- 18 you know, this is a long time ago. But I'm 19 assuming that, you know, I knew that she was in 20 distress, and she had gone silent and I hadn't 21 heard from her. So I was trying to check in and 22 see how she was.</p>	<p>1 A Yeah. 2 Q And these are notes from your file for 3 Amber Heard; is that right? 4 A That's correct. 5 Q Okay. And these are notes from 6 December 16th, 20- -- well, December 17th, 2015; 7 is that right? 8 A That's correct. 9 Q Okay. And in, "Mood/Affect," you wrote, 10 "anxious, sad"? 11 A Yes. 12 Q This is your handwriting, correct? 13 A Yes. 14 Q Okay. What did you mean by, "anxious, 15 sad"? 16 A That she was upset, experiencing anxiety 17 and sadness. She was -- she was very upset about 18 the relationship. 19 Q So Amber was experiencing anxiety and 20 sadness from her relationship with Mr. Depp, 21 right? 22 A Yes.</p>

<p>53</p> <p>1 MR. PRESIADO: Objection, calls for 2 speculation, lacks foundation. 3 BY MR. NADELHAFT: 4 Q And under, "New Issues," what did you 5 write there? 6 A Can you go down a little bit. 7 Q Sure. 8 MR. PRESIADO: Also I would object to 9 this, document is inauthentic to the extent it's 10 been modified from its original form, and apply 11 that objection to all questions based on this 12 document. 13 THE WITNESS: Do you want me to read it? 14 "Sister's estrangement" -- 15 BY MR. NADELHAFT: 16 Q No. Where it says, "New Issues," what did 17 you write there? 18 A Oh, "Altercation with JD." 19 Q And, "JD," stands for what? 20 A Johnny Depp. 21 Q And, then, what's written under there? 22 A "Stress over holiday plans."</p>	<p>55</p> <p>1 related that he started the physicality - pushed 2 her down"? 3 A Yeah. 4 Q And "he," in this, refers to Mr. Depp? 5 A Yes. 6 Q And then you wrote, "Amber got back up." 7 Is that right? 8 A Yes. 9 Q And then you wrote, "Hard for her to 10 de-escalate a fight"? 11 A Yeah. 12 Q And then you wrote -- what do you write 13 next? 14 A "Her strategy, despite our conversations, 15 is to give and fight back (not protective of self 16 and very self-defeating)." 17 Q Okay. 18 A The reason I wrote that was really, I 19 mean, a note to myself. I mean, in terms of when 20 they would get into -- they would have arguments, 21 and it was very hard for her to regulate her own 22 emotions, and they would -- they would escalate,</p>
<p>54</p> <p>1 This was their -- how they were going to 2 spend their Christmas holiday, and with whom. 3 Q And then continue, what else did you write 4 there? 5 A "Sister's estrangement." Amber was having 6 difficulties with her sister. "Plans with Amber's 7 parents and Johnny and Amber's friends, planning 8 Christmas." 9 There was some conflict over who to invite 10 and who was going to be there, and arrangements, 11 and she was upset about all of those plans. And 12 there was something, I see what I wrote here, 13 "Some spark ignited an argument." 14 I don't know exactly what the, "spark," 15 was, but it escalated and got violent. 16 Q So you wrote, "Some spark ignited an 17 argument that escalated and got violent," correct? 18 A Yeah. 19 Q And then you wrote, "shoving and 20 screaming"? 21 A Yeah. 22 Q And then you wrote, if we go down, "Amber</p>	<p>56</p> <p>1 as opposed to -- I was trying to teach her how to 2 de-escalate those kinds of situations, to handle 3 the conflict that they got into in more 4 constructive ways, and ways that were less likely 5 to, you know, result in anything that would be 6 damaging. 7 Q And -- the highlighting, do you know what 8 the highlighting is on the document? 9 (Whereupon, an unintended conversation 10 occurred.) 11 MR. NADELHAFT: Ben, you're on. 12 (Whereupon, the audio was muted.) 13 MR. NADELHAFT: Sorry about that. 14 BY MR. NADELHAFT: 15 Q Dr. Cowan, do you know what the 16 highlighting is? 17 MR. PRESIADO: Objection, vague and 18 ambiguous. 19 A I'm not sure why I highlighted. I guess 20 it was -- I don't recall why I highlighted it. 21 But, maybe, just to remind myself of, you know, 22 what I thought was important here.</p>

<p>57</p> <p>1 MR. NADELHAFT: All right. Okay. 2 You can take that down. Thank you. 3 And why don't you put up -- can you put up 4 Heard 33. 5 (Document displayed.) 6 (Whereupon, the above-referenced document 7 was marked as Exhibit No. 4.) 8 BY MR. NADELHAFT: 9 Q And, Dr. Cowan, I'm showing you what's 10 been marked as Cowan -- 11 MR. NADELHAFT: Is this Exhibit 4? 12 Q -- Cowan 4. Did you produce these 13 documents -- this document from your files? 14 A I did. 15 Q And it's your handwriting on the top that 16 says, "Note: Amber Heard"? 17 A Yeah. 18 Q Okay. And then it says, "Text message, 19 12/22/15," in your handwriting, correct? 20 A That's correct. 21 Q Okay. And then the message says, in type, 22 "I am so sorry if I worried you. As you can</p>	<p>59</p> <p>1 A I, you know, I felt that it was important 2 because -- you know, they had gone to the island. 3 She -- you know, my -- between the lines, what I 4 was doing here was, I was really trying to get 5 Amber to look at how toxic her relationship with 6 Johnny was and to be able to leave that 7 relationship. I didn't think it was a healthy 8 relationship for her. 9 And I think, maybe, that's why I, you 10 know, I pulled this out and put it in a note, 11 because I thought the relationship was destructive 12 -- a destructive one and not in her best interest. 13 Q And then you wrote in this note -- this is 14 your handwriting under the text message, correct? 15 A Yes. 16 Q And you wrote, "This text was in response 17 to a message I sent expressing concern." 18 And then you wrote, "This is, obviously, a 19 toxic and destructive relationship. Amber 20 understands how damaged and damaging the 21 relationship is, and still refuses to move on." 22 That was your assessment, correct?</p>
<p>58</p> <p>1 imagine, the day of travel, (the 20th), he came 2 over to," quote, "'say goodbye,' and there 3 commenced an entire day of hashing it 4 out...ultimately ending in his agreement to commit 5 to the couple's counseling, et cetera...and my 6 decision to go to the island with him and the 7 kids. It's just us, and has been relaxing and 8 incredibly peaceful, even if it's just avoiding an 9 inevitable larger 'discussion/conclusion.' 10 Anyway, sorry for the long text. I will text you 11 when I get back to LA. I wish I could tell you I 12 had the ability to walk away, but I just wasn't 13 (although I certainly saw he believed I had). But 14 anyway...I will text you when I get back on the 15 30th. Perhaps I need to rush on in there as soon 16 as you open up for the new year...Thank you for 17 checking in, Connell. That means a lot to me." 18 Why did you put that text message in your 19 notes? 20 A I -- I don't recall any particular reason, 21 but I -- I'm not sure. 22 Q Okay.</p>	<p>60</p> <p>1 A Yeah. And, you know, I think, when I make 2 a note like this, it's really a process note for 3 me to kind of remind myself of, you know, where we 4 are in this -- in this process, you know, and what 5 my position is, and, you know, where she is. 6 Q And how was -- how, in your evaluation, 7 how was Amber "damaged" in this relationship? 8 MR. PRESIADO: Objection, lacks 9 foundation, calls for speculation. 10 A I think she was damaged from the 11 standpoint of being able to express her gifts, her 12 talents, her intelligence, her ambition and career 13 aspirations. He -- Johnny was insecure in his 14 relationship with her, and controlling. So 15 instead of having a partner that was encouraging 16 and nurturing and wanting the best for her, I felt 17 that it was something that was constraining, and 18 debilitating, and depleting. 19 Q And, as of December the 22nd of 2015, it 20 was your understanding that Amber was still trying 21 to work on her relationship with Mr. Depp, right? 22 A Yes.</p>

<p>77</p> <p>1 A I don't recall the specifics of what they 2 were fighting about, but it was usually around, 3 then, the common theme of her leaving and being in 4 situations where -- that made Johnny worry and 5 feel insecure, you know, would lead to the kind of 6 conflict that they had.</p> <p>7 Q Okay. And so just so the record is clear, 8 where it says, "After tumultuous fighting, Amber 9 did go to London," that is, "tumultuous fighting," 10 with Mr. Depp, correct?</p> <p>11 MR. PRESIADO: Objection, lacks 12 foundation, calls for speculation. 13 Go ahead.</p> <p>14 A I'm assuming, yes, that's what it's 15 referring to.</p> <p>16 Q And do you know what Amber was going to 17 London for?</p> <p>18 A For work.</p> <p>19 Q Okay. For an acting job; Amber was going 20 to London for an acting job?</p> <p>21 A That's correct.</p> <p>22 Q And you said, "We are doing the session</p>	<p>79</p> <p>1 Q And, then -- then what did you write next?</p> <p>2 A "Particularly any kind of romantic scene 3 she has to do. Her movie with JF" -- I'm not sure 4 who "JF" is.</p> <p>5 Q James Franco.</p> <p>6 A Maybe Franco, "precipitated a drinking 7 binge that put Johnny Depp in the hospital. 8 Everyone around Johnny seems to be intimidated by 9 his power and money. No one stands up to him."</p> <p>10 Q And was -- was this your impressions, or 11 -- what you wrote here, or what Ms. Heard told 12 you, or a combination of both?</p> <p>13 MR. PRESIADO: Objection, compound.</p> <p>14 A It was a combination of both. I mean, 15 this is, obviously, something that Amber indicated 16 to me, but I, you know, I may have put it in words 17 that, you know, were -- you know, that I was 18 concluding. You know, "by his power and money," I 19 don't know whether she said that or I just, you 20 know, wrote that based on some of the things that 21 she was saying.</p> <p>22 Q Okay. And so you understood -- it was</p>
<p>78</p> <p>1 over Viber." 2 What is "Viber"?</p> <p>3 A It was just a way to communicate, you know 4 -- it was a phone. Viber is a phone app, you 5 know, where you can communicate, you know, long 6 distance.</p> <p>7 Q Okay. And is it where you can see 8 somebody, or just talking -- speaking?</p> <p>9 A No, it was just speaking.</p> <p>10 Q Okay. And if we go down a little bit in 11 these notes, do you see where -- and this is your 12 highlighting here?</p> <p>13 A Yeah.</p> <p>14 Q Okay. And you wrote, "JD is very 15 threatened by career," correct?</p> <p>16 A Yeah.</p> <p>17 Q And that meant that Johnny Depp was very 18 threatened by Amber's career?</p> <p>19 A Yeah.</p> <p>20 MR. PRESIADO: Objection, lacks 21 foundation, calls for speculation, leading. 22 BY MR. NADELHAFT:</p>	<p>80</p> <p>1 your understanding, in working with Amber, that 2 Mr. Depp was threatened by romantic scenes that 3 Amber Heard did in her movies; is that right?</p> <p>4 A Yes, that's correct.</p> <p>5 Q Okay. And you understood that these 6 feelings led to Mr. Depp going on a drinking 7 binge?</p> <p>8 A That's what she told me.</p> <p>9 Q Okay. And if we go down some more, and do 10 you see where you have -- and this is your 11 highlighting at the bottom of this page?</p> <p>12 A Yeah.</p> <p>13 Q Okay. And you wrote, "His narcissism 14 presents enormous challenges for his," what?</p> <p>15 A Yeah, I don't know what that is. It looks 16 like "mangled," but I don't know what that word 17 is. I don't know what I was referring to, "to 18 construct his own world."</p> <p>19 I'm not sure what I meant by that.</p> <p>20 Q Okay. But where you write about, "His 21 narcissism," you're taking about -- you're writing 22 about Johnny Depp, correct?</p>

Depp, II -v- Heard

<p style="text-align: right;">81</p> <p>1 A Yes.</p> <p>2 Q And where you're writing about, "manage to 3 construct his own world," you're writing about 4 Johnny Depp, correct?</p> <p>5 MR. PRESIADO: Objection, lacks 6 foundation, assumes facts not in evidence, 7 leading, calls for speculation.</p> <p>8 A Yes.</p> <p>9 Q Okay. And this sentence here that you 10 wrote here, in reading it -- in writing and 11 reading it, what did you mean by it?</p> <p>12 A Well, again, this is -- you know, I wrote 13 this a long time ago. I don't really recall 14 exactly. This sentence, as I read it, doesn't 15 make any sense to me. So I mean, I was referring 16 to -- you know, if I can kind of open the aperture 17 here a little bit, when I talk to patients and get 18 impressions of the important people in their life, 19 and, in this case, Johnny, the impressions I was 20 getting and coming to formulate in my own mind, 21 were impressions that I was getting from Amber as 22 she described their relationship.</p>	<p style="text-align: right;">83</p> <p>1 Q Okay. And all of these notes that we've 2 looked through, your progress notes, your 3 handwritten notes, did Ms. Heard ever look at the 4 notes?</p> <p>5 A No.</p> <p>6 Q And did you show these notes to anybody 7 else?</p> <p>8 A No.</p> <p>9 MR. NADELHAFT: Okay. Can we put up 10 Heard 9, please.</p> <p>11 (Whereupon, the above-referenced document 12 was marked as Exhibit No. 9.)</p> <p>13 (Document displayed.)</p> <p>14 BY MR. NADELHAFT:</p> <p>15 Q And, Dr. Cowan, I'm showing you what's 16 been marked as Cowan Exhibit 9, and these are more 17 of your psychotherapy progress notes, correct?</p> <p>18 A Yes.</p> <p>19 Q And these notes are from 20 September 15th, 2014, with Amber Heard?</p> <p>21 A That's correct.</p> <p>22 Q And do you see where there's highlighting</p>
<p style="text-align: right;">82</p> <p>1 And it -- it felt that -- that -- the only 2 thing I can think the sentence meant that I was 3 referring to, was that, when -- when you have a 4 kind of singular focus on yourself, everything, 5 then, relates to and challenges and enhances or 6 detracts from your sense of well-being. That's 7 what I meant by "narcissism."</p> <p>8 And it -- it was just kind of my growing 9 suspicion that, that this was going to be an 10 issue. So I mean, again, these notes that I'm 11 making, I mean, I had no idea anybody would ever 12 read them.</p> <p>13 Q Right.</p> <p>14 A They were more just reminders to me of 15 what, you know, what lie ahead, and, you know, 16 what, maybe, was going to be important.</p> <p>17 Q So in working with Ms. -- in working with 18 Amber, it was your impression that Mr. Depp was a 19 narcissist?</p> <p>20 MR. PRESIADO: Objection, leading, lacks 21 foundation, calls for speculation.</p> <p>22 A Yes.</p>	<p style="text-align: right;">84</p> <p>1 there?</p> <p>2 A Yes.</p> <p>3 Q And that's your highlighting?</p> <p>4 A Yes.</p> <p>5 Q Okay. And you wrote, "She did" -- "She 6 did report that she is concerned about his Xanax 7 usage."</p> <p>8 What are you referring to there?</p> <p>9 A She thought he was -- that he was taking 10 too much Xanax.</p> <p>11 Q Just so the record is clear, Amber thought 12 that Mr. Depp was taking too much Xanax, correct?</p> <p>13 A That's correct.</p> <p>14 Q All right. And then you wrote, "Has a 15 history of Xanax," what's the next word?</p> <p>16 A I think it was probably Ativan, Klonopin.</p> <p>17 Q Okay. "Abuse and a personality change"?</p> <p>18 A Yeah.</p> <p>19 Q So what -- what did you mean here?</p> <p>20 A What I was referring to was her -- I'm 21 assuming these were -- based on my conversation 22 with her, that she told me that, you know, his use</p>

<p style="text-align: center;">85</p> <p>1 of Xanax, and Ativan, and Klonopin, which are all 2 sedatives, were abusive, meaning that he took too 3 much of it, and when he took these medications, 4 that, you know, she experienced a personality 5 change. That he would get angry and morose, and 6 she was concerned. 7 Q Did Ms. Heard ever -- was there ever any 8 references to Mr. Depp being a "monster"? 9 MR. PRESIADO: Objection, leading, lacks 10 foundation, calls for speculation, assumes facts 11 not in evidence. 12 A A "monster." I don't recall "monster" as 13 being a word that she used. 14 Q Okay. 15 A It may have been, but I don't recall that. 16 Q But you recall that when she informed you 17 that when he abused -- when Mr. Depp abused drugs, 18 there was a personality change, correct? 19 A Yes. 20 Q And that personality change included being 21 angry and morose with Ms. Heard, correct? 22 A Yeah.</p>	<p style="text-align: center;">87</p> <p>1 been marked as Cowan Exhibit 10, and these are 2 more text messages between you and Amber Heard, 3 correct? 4 A Yes. 5 Q Okay. And on -- and these text messages 6 came from your cell phone, correct? 7 A Yes. 8 Q Okay. And, on November 7th, 2014, it's 9 Amber's texts that are in gray, correct? 10 A That's correct. 11 Q And, on November 7th, 2014, Amber wrote, 12 "I can't call. Johnny just broke up with 13 me...He's manic though. Hasn't slept. Is high. 14 And probably drinking. I don't know what to do. 15 But I can't talk right now." 16 Did you receive that text message? 17 A I did. 18 Q And you wrote, "So sorry you are going 19 through this. I'm home and in for the night. 20 Call me when you can." 21 A Yes. 22 Q Okay. And you believed Ms. Heard when she</p>
<p style="text-align: center;">86</p> <p>1 MR. PRESIADO: Objection, leading, asked 2 and answered, calls for speculation, lacks 3 foundation. 4 BY MR. NADELHAFT: 5 Q And then, under that, you write, "A is 6 afraid this may happen again." 7 And, "A," is referring to Amber, correct? 8 A Yes. 9 Q Okay. And do you recall what Amber was 10 "afraid" of? 11 A I'm assuming what I meant there was that 12 -- that he would continue to abuse these 13 medications, and that she would experience, yeah, 14 his anger. 15 Q Okay. 16 MR. NADELHAFT: And if we can put up 17 Heard 10. 18 (Whereupon, the above-referenced document 19 was marked as Exhibit No. 10.) 20 (Document displayed.) 21 BY MR. NADELHAFT: 22 Q And, Dr. Cowan, I'm showing you what's</p>	<p style="text-align: center;">88</p> <p>1 texted you that, correct? 2 A Yes. 3 Q Okay. And then Amber -- 4 MR. NADELHAFT: If we scroll down a little 5 bit. 6 Right there. 7 Q -- Amber says, November 7th, 2014, "Can we 8 come to see you tomorrow? You mentioned before 9 you were available around noon or something." 10 Do you see that? 11 A Yes. 12 Q And when Amber said, "Can we come to see 13 you tomorrow," who is she referring to? 14 A She and Johnny. 15 Q Okay. So were you going to have -- was it 16 the intention to have a joint session with Amber, 17 and Mr. Depp, and you? 18 A Yes. 19 Q And, then, down on -- on 20 November 8th, 2014, Amber writes, "Hey there. 21 Good news - things are better. He wants to come 22 and see you. Bad news, we're both exhausted from</p>

Depp, II -v- Heard

89	91
<p>1 the marathon breakup fighting, and I feel like 2 just a little more of a break or rest before 3 starting dialogue about things. I just feel like 4 going in with a little more energy and a little 5 less mad will help initiate this process. Can we 6 come see you tomorrow instead, perhaps?" 7 Did you receive that text message? 8 A Yes, I did. 9 Q Okay. And did Mr. Depp and Amber come in 10 to a joint session with you? 11 A Yes, they did. 12 Q Okay. And what do you remember about that 13 joint session? 14 A It was -- it was a very difficult session. 15 (Whereupon, Dr. Curry joined the meeting.) 16 A The -- the thing that stood out for me was 17 Amber was very subdued. This is the first time I 18 had had a chance to talk with Johnny directly, and 19 to try and understand his perspective on the 20 relationship. He was -- he was angry with her. 21 It felt very diffuse. It wasn't related to 22 anything that he talked about directly, but it had</p>	<p>1 A Yes. He was very angry. 2 Q Would you say that he yelled? 3 A Yes. 4 Q Okay. Did he yell at you? 5 A No, you know, he was just -- he was upset 6 and he was angry. I'm used to -- if I see 7 couples, yelling is not uncommon. You know, 8 people get emotional. And he was emotional. He 9 was, you know, he was loud. 10 Q Do you recall if Mr. Depp went to the 11 bathroom during any time during this session? 12 A Yes, he did. 13 Q And do you have any belief as to what 14 Mr. Depp did when he went to the bathroom? 15 MR. PRESIADO: Objection, lacks 16 foundation, calls for speculation. 17 A I'm assuming that he rolled a joint. When 18 he came out, he had it in his mouth. 19 Q Okay. So in his session with -- in his 20 session with you, Mr. Depp was smoking a joint? 21 A No. No. He just had it in his mouth. He 22 never lit it.</p>
90	92
<p>1 to do with trust, and his sense of, I think, of 2 having been lied to or betrayed for some breach of 3 trust. 4 He was -- he was very emotional. He was 5 having angry, and he terminated the session early. 6 He wanted to leave, and she was very upset that he 7 wanted to leave and no longer was able to be there 8 emotionally, and they left. 9 Q What was your sense of what Mr. Depp felt 10 that he was lied to about? 11 A He didn't -- he didn't go into any 12 specifics. It was about trust. I remember when 13 they were walking out the door, Amber said, you 14 know, I want you to believe me, I want you to 15 trust me. 16 And he said very, you know, in a very 17 angry voice, you know, "Well then, fucking earn 18 it." 19 So I don't know what that meant. That's 20 what he said. 21 Q And did Mr. Depp raise his voice during 22 the joint session?</p>	<p>1 Q Okay. 2 THE TECHNICIAN: I'd like to note that 3 Dr. Shannon Curry just joined in. 4 MR. NADELHAFT: Can we -- I'm going to -- 5 I'm going to object to Dr. Curry being at this 6 deposition. We weren't given any notice that she 7 was going to be here. 8 MR. PRESIADO: She's been disclosed as an 9 expert witness, and there's no obligation to give 10 notice prior to the deposition. 11 MR. NADELHAFT: All right. Well, we note 12 our objection that Dr. Curry is here. Anyway -- 13 MR. PRESIADO: Do you want to be more 14 specific, other than just your negative objection? 15 MR. NADELHAFT: I -- I'm not sure that she 16 has a right, as a nonparty, to be at this -- at 17 the deposition, but I don't want to take up time 18 with that. You know, I know she was disclosed as 19 an expert, but, you know, I'm not sure she has -- 20 you know, she can read a transcript. I'm not sure 21 she has the right to be here at the deposition. 22 But I'm not going to take up more time with that.</p>

<p style="text-align: right;">93</p> <p>1 MR. PRESIADO: But do you have any 2 objection, for the record, on that position? 3 MR. NADELHAFT: I don't want to take up 4 more time with this. We have our objection. I 5 assume she's not going to -- I assume she's 6 staying, so we'll just move on. 7 MR. PRESIADO: Okay. and I just want to 8 state, for the record, that it's not a full and 9 complete objection that would support the 10 [indiscernible]. 11 MR. NADELHAFT: Do you have authority for 12 her being here? 13 MR. PRESIADO: I'm -- you're taking the 14 deposition. 15 MR. NADELHAFT: As will you, so what's 16 your authority for her being here? 17 MR. PRESIADO: It's not my objection. 18 You're making the objection. 19 MR. NADELHAFT: Right, do you have -- you 20 don't have any authority either. So we'll move 21 on. Okay. 22 BY MR. NADELHAFT:</p>	<p style="text-align: right;">95</p> <p>1 Dr. Dawn Hughes [ph] about Amber? 2 A Well, maybe that was who I talked to. It 3 was months ago. I had a phone conversation with 4 someone from Amber's side, so I'm assuming that 5 Dr. Curry is on Mr. Depp's side. 6 Q I don't know that Dr. Curry is on 7 Mr. Depp's side. 8 Did you have any conversations with anyone 9 from Mr. Depp's side before this deposition? 10 A No. 11 Q If we could go back into the exhibit, 12 Cowan 10. And, if we go down, on 13 November 8th, 2014, in the blue, this is a text 14 from you, correct? 15 A That's correct. 16 Q Okay. And you wrote, "Amber, so sorry our 17 time together didn't go better. So much hurt and 18 distrust in the mix. Both sides. Just want you 19 to know that you didn't do anything to provoke him 20 today. It's very hard for Johnny to stay on the 21 vulnerable side instead of armoring up. Hope he 22 will stay in therapy and get the skills to deal</p>
<p style="text-align: right;">94</p> <p>1 Q Dr. Cowan, do you know how long this 2 session was before Mr. Depp aborted it? 3 A I would imagine about a half an hour. 4 Q And how long was the session supposed to 5 be? 6 A An hour. 7 Q Okay. Dr. Cowan, have you ever spoken to 8 Dr. Curry before? 9 A I believe I had a phone conversation with 10 her, months ago, about Amber. 11 Q You had a conversation with Dr. Curry 12 about Amber? 13 A Yes. 14 Q Okay. 15 A Well, no. I'm not sure. I had a 16 conversation with someone about Amber, where there 17 was a release. I don't know whether it was Dr. -- 18 I don't remember the names, so I was assuming that 19 it was Dr. Curry, but I'm not sure that that's 20 true. 21 Q Okay. That's fair. 22 Do you know if you had a conversation with</p>	<p style="text-align: right;">96</p> <p>1 with his feelings more constructively. He's hurt 2 and will have to find ways to heal himself. Maybe 3 down the road, the three of us can get together. 4 Not sure that he's ready to do that at this point, 5 even though it would be helpful. 6 "It's very important for you to trust 7 yourself, be straight, and believe you are strong 8 enough to deal with what comes. It takes ten 9 thousand truths to keep a house up, and only one 10 lie to bring it down. Get your point on context 11 totally, but the only way to make sure he doesn't 12 attach fear and distrust to you is to be painfully 13 transparent. For now, let Johnny work on himself 14 and you do the same. I'm around. Call or text me 15 tomorrow and we'll make a plan to talk or get 16 together. Be strong and believe in yourself. I 17 do." 18 You wrote that, correct? 19 A I did. 20 Q Okay. And, after reading this, is there 21 anything more about the session with Mr. Depp and 22 Amber, the joint session, that you recall, that</p>

97	99
1 you haven't already shared?	1 write, "anxious/unstable."
2 A No.	2 Do you see that?
3 Q Okay. And then Amber wrote, "Thank you	3 A Yes.
4 for your text. It means a lot to me. I'm really	4 Q And how do you make that determination?
5 upset that it appeared to 'fail.' I had hopes of	5 A Just from behavior. Nonverbal behavior,
6 it helping. And no doubt, one day it could. But	6 verbal behavior. She was moody, depressed,
7 I agree, I don't think he's ready. He is like a	7 anxious, agitated.
8 child in many ways. With very little foresight	8 Q Okay. And so when you say,
9 and a hairline trigger that only he knows he's	9 "anxious/unstable," you mean that Amber was
10 tripped. I love him more than anything, but he is	10 anxious and unstable, correct?
11 really difficult. My heart and body are simply	11 A Yes.
12 exhausted from this battle. I really hope you can	12 Q Okay. And, if we go down the page, do you
13 help me figure out how I can cope with him despite	13 see where it's highlighted?
14 his state. I hope I can build our house again,	14 A Yeah.
15 I'm homesick."	15 Q That's your highlighting?
16 You received that text message?	16 A Yeah.
17 A I did.	17 Q And you wrote, "Exchanged texts with Amber
18 Q And what did you understand Amber to mean	18 11/7, telling her that J had broken up with her.
19 there?	19 Reported that he was manic and probably drinking."
20 MR. PRESIADO: Objection, calls for	20 And that's based on the text messages that
21 speculation, lacks foundation.	21 we just looked at, correct?
22 A Well, she was — she had the hope that	22 A Yeah.
98	100
1 that session would have gone, you know, in a very	1 Q Okay. And if we do down to the bottom,
2 different direction, and that she was very	2 there's more highlighting; do you see that?
3 disappointed and desirous of trying to, you know,	3 A Yeah.
4 develop some kind of healthier way of being with	4 Q And that's your highlighting?
5 him.	5 A Yes.
6 Q And so as of November 8th/9th, 2014, Amber	6 Q And you wrote, "Joint session, Amber and
7 was looking to make her relationship with Mr. Depp	7 Johnny Depp. He was very provocative and angry
8 work, correct?	8 with her. Unproductive, and he aborted the
9 A Yes.	9 session," correct?
10 MR. NADELHAFT: Okay. We can take that	10 A Correct.
11 down.	11 Q And these notes accurately describe the
12 Can you put up Heard 11.	12 joint session that you had with Amber and
13 (Whereupon, the above-referenced document	13 Mr. Depp, correct?
14 was marked as Exhibit No. 11.)	14 A Correct.
15 (Document displayed.)	15 Q Okay.
16 BY MR. NADELHAFT:	16 MR. NADELHAFT: You can take that down.
17 Q Dr. Cowan, I'm showing you your	17 Can you put up Heard 14.
18 psychotherapy progress notes from	18 (Whereupon, the above-referenced document
19 November 8th, 2014, correct?	19 was marked as Exhibit No. 12.)
20 A Yes.	20 (Document displayed.)
21 Q And this is Cowan 11.	21 BY MR. NADELHAFT:
22 And where you have, "Mood/Affect," you	22 Q And, Dr. Cowan, I'm showing you what's

101	103
1 been marked as Cowan Exhibit 12. And this is an 2 e-mail chain between you and Dr. Kipper. 3 Do you see that? 4 A Yes. 5 Q Okay. And if you go down a little bit, 6 right there, on January 27th, 2015, at 6:11 p.m., 7 you received an e-mail from Dr. Kipper? 8 A Yes. 9 Q And it says, "Con, sorry for getting back 10 to you late. I'm swamped. Amber and JD have been 11 fighting non-stop since he confirmed his need for 12 a prenop on their way to the airport (going to 13 Japan to promote his movie). She tried to push up 14 the date up of the wedding to avoid all this, but 15 the reality is he will need a prenop. If she 16 fails to sign, they won't get married. 17 "Both behaved like super triple DD types, 18 complete with thrown coffee, attempts to storm the 19 cockpit by him to turn the plane around, and 20 attempts by her to leave the plane while they were 21 over the fucking ocean, et cetera. They are due 22 home in a day and or so, but, as I point out to	1 behaved like super triple DD types"? 2 MR. PRESIADO: Objection, calls for 3 speculation, hearsay. 4 A I know exactly what he means by that. 5 This refers to – "D" refers to dopamine, and when 6 you have a dopamine imbalance you – dopamine 7 imbalance results in certain kind of predictive 8 behavior, and that's what he's referring to when 9 he says a double D – is someone with a dopamine 10 imbalance. 11 Q And so what happens when someone has a 12 dopamine imbalance? 13 MR. PRESIADO: Objection, assumes facts 14 not in evidence, calls for speculations, lacks 15 foundation. 16 A They tend to be more impulsive, they tend 17 to externalize anger, as opposed to internalizing 18 anger. They tend to have a more difficult time 19 delaying gratification. There are other aspects, 20 but those are some of the characteristics of that 21 kind of imbalance. They are also more vulnerable 22 to bipolar disease.
102	104
1 him, she is in control because she can either sign 2 or not sign. I told him if she didn't sign, I 3 would buy him another island." 4 Did you receive this e-mail from 5 Dr. Kipper? 6 A Yes. 7 Q What is your understanding of what 8 happened on the flight to Japan? 9 A Well – 10 MR. PRESIADO: Objection, calls for 11 speculation, lacks foundation. 12 A You know, I don't know. I mean, this is 13 not something that Amber talked about. This was 14 just an e-mail I got from Dr. Kipper, and it's – 15 my understanding it was just what I'm reading here 16 now. 17 Q Okay. Did you have any conversations with 18 Amber about anything happening either in Japan or 19 on the flight to Japan? 20 A No. 21 Q Okay. What does it mean -- what do you 22 understand it to mean where Kipper said, "both	1 Q And you're writing a book on dopamine 2 imbalance currently, correct? 3 A Yes. I mean, that's one of the imbalances 4 that there are; so yes, that's correct. 5 Q Okay. 6 MR. NADELHAFT: We can take this down. 7 Can you put up Heard 16, please. 8 (Whereupon, the above-referenced document 9 was marked as Exhibit No. 13.) 10 (Document displayed.) 11 BY MR. NADELHAFT: 12 Q Dr. Cowan, I'm showing you what's been 13 marked as Cowan 13. These are more psychotherapy 14 progress notes from your files for Amber Heard, 15 correct? 16 A Yeah. 17 Q And these notes are from 18 February 24th, 2015? 19 A Yes. 20 Q And in the, "Mood/Affect," you wrote, 21 "anxious," for Amber? 22 A Yes.

105	107
<p>1 Q Okay. And, if we go down, and that's your 2 highlighting there on this page? 3 A Yes. 4 Q Okay. And then it says, "Apparently, J 5 fired Amber's prenup lawyer and they got married 6 without one, on an island property of Johnny's," 7 correct? 8 A Yes. 9 Q And then you write, "Afraid marriage will 10 not provide any solution to this toxic 11 relationship"? 12 A Yes. 13 Q So in working with Amber, your belief was 14 that the relationship between Mr. Depp and Amber 15 was toxic, correct? 16 A Yes. 17 Q Okay. And then it says, "Hard being the" 18 -- what does that say? 19 A "Spoil sport." 20 Q Okay. "Hard being the spoil sport at a 21 time that should be celebratory." 22 Are you referring to yourself as being a</p>	<p>1 Q Okay. 2 MR. NADELHAFT: All right. We can take 3 this down. 4 THE TECHNICIAN: (Complies.) 5 Q And did you understand that, shortly after 6 Mr. Depp and Amber got married, Mr. Depp was 7 filming a movie in Australia? 8 A Yes. 9 Q And that Amber went out to see Mr. Depp in 10 Australia to be with him? 11 A Yes. 12 Q And this was, approximately, in March of 13 2015? 14 A Yes. 15 MR. NADELHAFT: Okay. Can we put up 16 Heard 17. 17 (Whereupon, the above-referenced document 18 was marked as Exhibit No. 14.) 19 (Document displayed.) 20 BY MR. NADELHAFT: 21 Q This is Cowan 14, and I'll represent to 22 you that these are text messages between</p>
106	108
<p>1 "spoil sport"? 2 A Yes, I am. 3 Q And you highlight, "I think this is a just 4 a slow-moving crash." 5 What did you mean by that? 6 A I didn't think the relationship was 7 sustainable. 8 Q And then you write, "Issues of sobriety 9 and trust have not been resolved." 10 In terms of "sobriety," who were you 11 referring to? 12 A Mr. Depp. 13 Q And "trust," who were you referring to? 14 A Mr. Depp. But, you know, I think they 15 both had trust issues. 16 Q Okay. 17 A I don't think that it was, you know, 18 one-sided. By I think the issues of distrust were 19 much more pointed of Johnny's distrust of Amber. 20 Q Okay. And then the last thing you wrote 21 was, "Toxic situation"? 22 A That's correct.</p>	<p>1 Dr. Kipper and Mr. Depp. And if we look at the 2 one at the bottom there, it says, 3 "March 7th, 2015." 4 Do you see where it starts -- 5 MR. NADELHAFT: Move up a little bit. 6 Right there. 7 BY MR. NADELHAFT: 8 Q Do you see where it says -- starts with, 9 "Hi"? 10 A Yes. 11 MR. PRESIADO: I'm sorry. What number box 12 are you referring to? 13 MR. NADELHAFT: Seventy-eight. Box 78. 14 Thank you. 15 BY MR. NADELHAFT: 16 Q And Mr. Depp wrote to Mr. Kipper. "Hi. 17 Fucked, man...had another one. I cannot -- I just 18 cannot live like this. She is as full of shit as 19 a Christmas Goose. I'm done, no more. The 20 constant insults, the demeaning, the belittling, 21 most heartbreaking spew that is only released from 22 a malicious, evil, and vindictive cunt. But you</p>