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CLERK, CIRCUIT COURT  
FAIRFAX, VA

# Transcript of Jury Trial - Day 15

**Date:** May 4, 2022  
**Case:** Depp, II -v- Heard

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WORLDWIDE COURT REPORTING & LITIGATION TECHNOLOGY

Transcript of Jury Trial - Day 15  
Conducted on May 4, 2022

1 (4030 to 4033)

4030	4032
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 Wednesday, May 4, 2022 16 10:00 a.m. EDT 17 TRIAL DAY 15 18 19 20 Job No.: 443897 21 Pages: 4030 - 4321 22 Reported by: Judith E. Bellinger, RPR, CRR	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 CAMILLE M. VASQUEZ, ESQUIRE 13 BROWN RUDNICK LLP 14 2211 Michelson Drive 15 7th Floor 16 Irvine, CA 92712 17 949.440.0234 18 19 20 21 22
4031	4033
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	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 WAYNE F. DENNISON, ESQUIRE 10 REBECCA MACDOWELL LECAROS, ESQUIRE 11 BROWN RUDNICK LLP 12 One Financial Center 13 Boston, MA 02111 14 617.856.8149 15 16 17 18 19 20 21 22

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2 (4034 to 4037)

4034	4036
<p>1 APPEARANCES CONTINUED</p> <p>2 ON BEHALF OF THE DEFENDANT AND COUNTERCLAIM</p> <p>3 PLAINTIFF:</p> <p>4</p> <p>5 ELAINE CHARLSON BREDEHOFT, ESQUIRE</p> <p>6 ADAM S. NADELHAFT, ESQUIRE</p> <p>7 CHARLSON BREDEHOFT COHEN BROWN &amp;</p> <p>8 NADELHAFT, P.C.</p> <p>9 11260 Roger Bacon Drive</p> <p>10 Suite 201</p> <p>11 Reston, VA 20190</p> <p>12 703.318.6800</p> <p>13</p> <p>14 J. BENJAMIN ROTTENBORN, ESQUIRE</p> <p>15 WOODS ROGERS PLC</p> <p>16 10 South Jefferson Street</p> <p>17 Suite 1400</p> <p>18 P.O. Box 14125</p> <p>19 Roanoke, VA 24011</p> <p>20 540.983.7540</p> <p>21</p> <p>22</p>	<p>1 EXHIBITS</p> <p>2 Offered Admitted</p> <p>3 Plaintiff's</p> <p>4 1241 4057 4057</p> <p>5 1242 4146 4146</p> <p>6 1244 4131 4132</p> <p>7 1246 4081 4081</p> <p>8 1247 4104 4104 (first page)</p> <p>9 1247 4107 4109 (entire document)</p> <p>10</p> <p>11 Defendant's</p> <p>12 167A 4286 4286</p> <p>13 167 4290 4290 (with redactions)</p> <p>14 170A 4274 4275</p> <p>15 170 4276 4278</p> <p>16</p> <p>17</p> <p>18</p> <p>19</p> <p>20</p> <p>21</p> <p>22</p>
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<p>1 CONTENTS</p> <p>2 EXAMINATION OF DAWN M. HUGHES, PH.D., ABPP (CONTINUING)</p> <p>3 By Mr. Dennison 4046</p> <p>4 By Ms. Bredehoft 4144</p> <p>5 EXAMINATION OF AMBER LAURA HEARD PAGE</p> <p>6 By Ms. Bredehoft 4193</p> <p>7</p> <p>8</p> <p>9</p> <p>10</p> <p>11</p> <p>12</p> <p>13</p> <p>14</p> <p>15</p> <p>16</p> <p>17</p> <p>18</p> <p>19</p> <p>20</p> <p>21</p> <p>22</p>	<p>1 PROCEEDINGS</p> <p>2 THE BAILIFF: All rise.</p> <p>3 Please be seated and come to order.</p> <p>4 THE COURT: All right. Good morning.</p> <p>5 If I could have counsel approach for a</p> <p>6 moment, please.</p> <p>7 (Sidebar.)</p> <p>8 THE COURT: This new PR guy, I don't</p> <p>9 know who he is, but he just came through the back</p> <p>10 and he was extremely disrespectful to my sheriffs.</p> <p>11 To my captain, to my lieutenant. Very</p> <p>12 disrespectful because I told him he can't have his</p> <p>13 phone out. One of the deputies said he saw him</p> <p>14 with his phone out. Very disrespectful. I don't</p> <p>15 want him coming back.</p> <p>16 Ms. Barlow does not come through</p> <p>17 security. I thought I made myself very clear</p> <p>18 about that. She doesn't come through the back.</p> <p>19 Ms. Barlow came through the back with Ms. Heard</p> <p>20 this morning.</p> <p>21 MS. BREDEHOFT: Oh, I didn't know.</p> <p>22 THE COURT: I don't care if you didn't</p>

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3 (4038 to 4041)

<p style="text-align: right;">4038</p> <p>1 know, Ms. Bredehopt. This is your responsibility. 2 From now on, only Ms. Heard, her assistant and the 3 insurance attorney comes back to the back. 4 Period. If it happens again, I won't have anymore 5 come to the back. Understood? 6 MS. BREDEHOFT: Completely understood, 7 Your Honor. I apologize. 8 THE COURT: I don't know his name, but 9 he's very close to getting kicked out of my 10 courtroom. If you want to let everyone know right 11 now. I'm very upset about that. Nobody 12 disrespects my sheriffs. 13 MS. BREDEHOFT: I totally agree. Do 14 you want me to go talk to him now? 15 THE COURT: Absolutely. 16 Do we have anything else? 17 MS. BREDEHOFT: Yes. 18 THE COURT: Okay. 19 MS. BREDEHOFT: Your Honor may recall 20 that we talked about -- 21 MR. CHEW: Your Honor, just to clarify. 22 Ms. Barlow is not to come in the courtroom,</p>	<p style="text-align: right;">4040</p> <p>1 MS. BREDEHOFT: Nothing about IPV. And 2 then, Your Honor, I highlighted page 246. This is 3 where it starts. This is where Mr. Dennison says, 4 I think the witness just said that she saw no 5 prior evidence of intimate partner violence. And 6 then he argues that that implicates the prior 7 arrest of Ms. Heard because the person involved, 8 et cetera. 9 THE COURT: Okay. 10 MS. BREDEHOFT: And then he talked 11 about the notes. And your Honor may recall, both 12 Your Honor and I said I don't recall her 13 testifying to that. 14 THE COURT: Okay. 15 MS. BREDEHOFT: And she didn't. And, 16 in fact, she mentions nothing of it in her 17 disclosure. She did not testify to any of that. 18 She did not -- it doesn't come up in her 19 deposition, in her 8-hour deposition. 20 THE COURT: Okay. 21 MS. BREDEHOFT: So I think that's 22 incorrect. I don't think she's opened the door</p>
<p style="text-align: right;">4039</p> <p>1 correct? 2 THE COURT: No. She wasn't supposed to 3 come in the back way. 4 MS. BREDEHOFT: She has been barred. 5 THE COURT: Then she couldn't have 6 come. 7 MS. BREDEHOFT: I'm with you 8 completely, Your Honor. I completely understand 9 where you are coming from. 10 THE COURT: All right. Thank you. 11 MS. BREDEHOFT: So this is the rough 12 transcript. Your Honor may remember Mr. Dennison 13 said that the witness had testified about IPV with 14 prior relationships. And the actual testimony she 15 gave, and I've highlighted them in all of our 16 copies, is she was talking about personality 17 disorder. She said -- I'll let Your Honor read. 18 THE COURT: "Her emotional instability, 19 her affect dysregulation or her fear of 20 abandonment is only occurring in the relationship 21 with Mr. Depp, and we don't have evidence of it 22 before and we don't have evidence of it after."</p>	<p style="text-align: right;">4041</p> <p>1 and I don't think you can ask that question. 2 MR. DENNISON: Your Honor, it is 3 indirectly in her own notes. But with respect to 4 this testimony, these are the symptoms that she 5 has testified to relative to IPV. These are the 6 emotional instability, dysregulation, fear of 7 abandonment, those are all the symptoms she was 8 talking about at nauseam with the assistance of 9 her notes. That's exactly what we're talking 10 about. 11 THE COURT: I think I'm -- again, I 12 think I'm just going to stay with what I said 13 yesterday. You can ask that initial question 14 about whether or not -- 15 MR. DENNISON: I wrote down your 16 question. We have it verbatim. 17 THE COURT: Okay. 18 MS. BREDEHOFT: The question I was 19 going to look at the question so I understand. 20 MR. CHEW: We've got it verbatim, the 21 question that Your Honor allowed. 22 THE COURT: She wants to make sure</p>

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4 (4042 to 4045)

<p>4042</p> <p>1 everybody is on the same page. What is the 2 question? 3 MR. DENNISON: I have it in my notes. 4 I will have to find it in my notes. 5 THE COURT: I understand, Mr. Dennison. 6 MS. BREDEHOFT: So, "I'm going to allow 7 him to ask her that question." 8 THE COURT: What page are you on? 9 MR. DENNISON: "Did you say on direct 10 that you saw no previous inter-partner violence, 11 just yes or no?" 12 THE COURT: That's it. We'll just go 13 with that. 14 MR. DENNISON: Before we move out of 15 your face, I'm sorry. 16 THE COURT: That's okay. 17 MR. DENNISON: I just want to try to 18 figure out what we're doing with notes. Is this 19 witness coming back up to our cross-examination -- 20 THE COURT: Yeah. We can't have her 21 have her notes. We understand that, right? I 22 mean, she can't refer to her notes unless she asks</p>	<p>4044</p> <p>1 THE COURT: Okay. So just don't have 2 them. 3 MS. BREDEHOFT: May I tell her that? 4 THE COURT: You have a few things you 5 have to tell some different people, Ms. Bredehoft. 6 I'm sorry, I'm giving you homework, but I need to 7 get that done. It's totally upsetting. 8 MS. BREDEHOFT: I totally agree. I 9 feel exactly the way Your Honor does. I totally 10 respect Your Honor. 11 THE COURT: All right. 12 MS. BREDEHOFT: One more thing as long 13 as we're up here. We think there's going to be -- 14 Ms. Heard is going to be on after Dawn Hughes. 15 THE COURT: Which is after lunchtime? 16 MS. BREDEHOFT: We anticipate there's 17 going to be some significant hearsay exceptions to 18 that because they have been accusing her of 19 falsifying prior testimony. So we prepared a 20 brief, and I just want to give it to Your Honor 21 now. 22 THE COURT: Okay. So we can start</p>
<p>4043</p> <p>1 to do it. It appears yesterday, even when I was 2 watching her, she was still using her notes. 3 MS. BREDEHOFT: Your Honor, I've always 4 had experts bring their notes up there. 5 THE COURT: Bringing them is one thing. 6 Put them to the side and have them face down. 7 MS. BREDEHOFT: We'll tell her to make 8 sure to put them face down, and if she needs to 9 refer to them -- 10 THE COURT: No, no. 11 MS. BREDEHOFT: What should she do? 12 THE COURT: I don't think she should 13 bring them to the witness stand, at all. That way 14 she won't have that urge, I think, maybe. That'll 15 be better. And then if she thinks she needs to 16 refresh her recollection, she can ask Mr. Dennison 17 and then maybe her notes can be retrieved for that 18 one question. 19 Is that okay? 20 MR. DENNISON: I have a significant 21 number of questions for her, but I don't think 22 it's going to be anything close to a memory test.</p>	<p>4045</p> <p>1 dealing with the issues. 2 MS. BREDEHOFT: Right. We think there 3 are some cases that are pretty on point to this. 4 THE COURT: We'll take a look at it. 5 I'll take a look at it. 6 MS. BREDEHOFT: Thank you, Your Honor. 7 MR. CHEW: Thank you, Your Honor. 8 MR. DENNISON: Thank you, Your Honor. 9 THE COURT: Okay. 10 (Open court.) 11 THE COURT: All right. Are we ready 12 for the jury, then? 13 MR. DENNISON: Yes, Your Honor. 14 THE COURT: Wait. No, no, no. Not 15 yet. 16 I put my microphone on. Sorry, Judy. 17 Are we ready for the jury? 18 MS. BREDEHOFT: Yes, Your Honor. 19 Appreciate it. 20 THE COURT: Yes. 21 (Whereupon, the jury entered the 22 courtroom and the following proceedings took</p>

<p>4046</p> <p>1 place.)</p> <p>2 THE COURT: All right. Good morning,</p> <p>3 ladies and gentlemen.</p> <p>4 All right. Dr. Hughes, if you could</p> <p>5 come back to the stand for me, please.</p> <p>6 Thank you.</p> <p>7 THE WITNESS: Good morning.</p> <p>8 THE COURT: Good morning.</p> <p>9 Cross-examination.</p> <p>10 MR. DENNISON: Thank you, Your Honor.</p> <p>11 EXAMINATION BY COUNSEL FOR THE PLAINTIFF AND</p> <p>12 COUNTERCLAIM DEFENDANT (CONTINUING)</p> <p>13 BY MR. DENNISON:</p> <p>14 Q Good morning, Dr. Hughes. I'm Wayne</p> <p>15 Dennison. We haven't met before.</p> <p>16 A No. Good morning.</p> <p>17 Q You testified yesterday that you have</p> <p>18 to give careful attention to gendered stereotypes,</p> <p>19 correct?</p> <p>20 A That is correct.</p> <p>21 Q When you're talking about intimate</p> <p>22 partner violence, you have to pay attention to</p>	<p>4048</p> <p>1 the characteristic of a "victim" of intimate</p> <p>2 partner violence yesterday, you used the pronouns</p> <p>3 "she" or "her," didn't you?</p> <p>4 A I was using the she and her pronouns in</p> <p>5 this case because my determination was, as I</p> <p>6 stated, that Ms. Heard was the victim of intimate</p> <p>7 partner violence. That is why I was using the</p> <p>8 she/her pronouns.</p> <p>9 Q You, in fact, said women get into a</p> <p>10 relationship for all the right reasons.</p> <p>11 That's what you said, the woman gets</p> <p>12 into the relationship for all the right reasons.</p> <p>13 Then you say difficult for her -- for a</p> <p>14 victim to extricate herself. You go on to say</p> <p>15 that she can and she should; over and over you</p> <p>16 used "she," right?</p> <p>17 A I believe, in that case, I did because</p> <p>18 I was referencing this case, where I found</p> <p>19 Ms. Heard to be the victim of intimate partner</p> <p>20 violence. It doesn't mean that men don't get into</p> <p>21 the relationship for all the right reasons too. I</p> <p>22 believe they do.</p>
<p>4047</p> <p>1 gendered stereotypes.</p> <p>2 And during your testimony you, in fact,</p> <p>3 paid attention to gendered stereotypes, correct?</p> <p>4 A I'm not sure what you mean.</p> <p>5 Q Well, you said we were going to have to</p> <p>6 pay attention to gendered stereotypes. And then</p> <p>7 you testified at length, where you referenced both</p> <p>8 men and women. You paid attention to those</p> <p>9 stereotypes during the course of your testimony,</p> <p>10 correct?</p> <p>11 A What I was saying was you have to pay</p> <p>12 attention to gendered stereotypes when you're</p> <p>13 conducting these evaluations. You can't assume</p> <p>14 all the time that the male is the perpetrator and</p> <p>15 the female is the victim. You have to go into the</p> <p>16 evaluation understanding that the male also could</p> <p>17 be the victim of intimate partner violence.</p> <p>18 Q In fact, you're aware that there are</p> <p>19 large-scale studies that do say that IPV towards</p> <p>20 males does exist?</p> <p>21 A Of course.</p> <p>22 Q Okay. And every time you referred to</p>	<p>4049</p> <p>1 Q Nearly every time you referenced "the</p> <p>2 perpetrator" of IPV, you used he or him, didn't</p> <p>3 you?</p> <p>4 A And that goes back to the same</p> <p>5 reasoning, as I'm describing my understanding of</p> <p>6 my evaluation in this matter. Of course, men can</p> <p>7 be perpetrators and victims of intimate partner</p> <p>8 violence. That's well-established in the</p> <p>9 research, and that's well-established in my</p> <p>10 clinical practices as well.</p> <p>11 Q Isn't the reason that you used the</p> <p>12 pronouns that you did, that you almost always</p> <p>13 testify on behalf of a woman?</p> <p>14 A That's not correct.</p> <p>15 Q You don't even remember the last time</p> <p>16 you testified on behalf of a man.</p> <p>17 A Well, I don't testify on behalf of</p> <p>18 someone, I testify as to the results of my</p> <p>19 evaluation. I frequently treat and assess male</p> <p>20 victims of childhood sexual abuse who are coming</p> <p>21 into treatment for abuse by their Boy Scouts</p> <p>22 leader, by their coach, by their teacher, by a</p>

<p>4050</p> <p>1 trusted adult. I see them in therapy, I see them 2 in forensic matters, in criminal cases. So I 3 evaluate men all the time. 4 Q I didn't ask you about treatment. I 5 asked you about testimony. 6 You broke up your practice between 7 treatment and testimony. I'm not asking you about 8 treatment. 9 When is the last time you testified on 10 behalf of a man? 11 A I testified recently in a deposition on 12 behalf of a man who was traumatized because he was 13 wrongly convicted. 14 Q At the time of your deposition, 15 six weeks ago, you couldn't remember a single time 16 you had testified on behalf of a man? 17 A I testified, in my deposition, that I 18 testified in a case of a man who was wrongly 19 convicted, about 20 years, and suffered physical 20 and sexual violence in prison. And I detailed the 21 traumatic effect that happened on that gentleman. 22 Q All right. Why don't we take a look at</p>	<p>4052</p> <p>1 case that I testified in was in a same-sex 2 intimate partner violence, where the man was the 3 victim of another man. I routinely treat and 4 assess same-sex couples where the female can be 5 the perpetrator of another female, and the male 6 can be the perpetrator or victim of his partner. 7 Q So, let me get this. You testified in 8 a case where one male is alleged to have engaged 9 in an IPV against another male? 10 A Correct. 11 Q All right. Okay. 12 But that's the only one you remember? 13 A No. I've done this frequently. As you 14 well know, most cases don't go to trial. I've 15 worked on hundreds and hundreds of cases. You've 16 limited the testimony. Many cases don't come to 17 trial, but I've issued reports and worked on many 18 cases of same-sex intimate partner violence where 19 men are the victims. 20 Q But I did ask you about testimony. And 21 the question, your testimony, and the only 22 testimony you remember is the same-sex couple,</p>
<p>4051</p> <p>1 your deposition. 2 A Sure. 3 MR. DENNISON: I made two copies. 4 THE COURT: All right. Thank you. 5 MR. DENNISON: May I approach? 6 THE COURT: Yes. 7 THE WITNESS: Thank you. 8 Q All right. Transcript of the 9 deposition that you gave March 28th, 2022, 10 correct? 11 A Yes. 12 Q All right. Let's go to page 77. Let's 13 look at -- page 70, line 8. 14 "So you can't recall a single instance 15 where you were hired by the attorney representing 16 the male in an IPV matter, correct?" 17 A In an IPV matter. Not in a trauma 18 matter or a child sexual abuse matter. 19 Q So, that's the distinction. You don't 20 have any recollection of ever testifying on behalf 21 of a male in an IPV matter? 22 A As I stated yesterday, the very first</p>	<p>4053</p> <p>1 right? 2 A There were multiple same-sex couples 3 that I believed I testified. 4 Q That you testified in court, at trial? 5 A I believe, yes. 6 Q But you didn't remember that in March? 7 A I did remember that in March. 8 Q Okay. You're a professional witness, 9 correct? 10 A That's not correct. 11 Q No? You make hundreds of thousands of 12 dollars a year testifying in court, correct? 13 A Not testifying in court. I conduct 14 thorough comprehensive psychological evaluations 15 of individuals who are involved in a court case. 16 The majority of those cases never show up in a 17 courtroom. And half of my practice and half of my 18 income is about my clinical work with people who 19 are coming to me for therapy. 20 Q I didn't ask you about the other half 21 of your income. I'm asking you whether you made 22 hundreds of thousands of dollars a year testifying</p>

<p>4054</p> <p>1 as an expert witness in court?</p> <p>2 <b>A As you're phrasing that question,</b></p> <p>3 <b>that's not correct. That would be the amount of</b></p> <p>4 <b>income that I generate from my forensic practice.</b></p> <p>5 <b>I testify, perhaps, maybe once or twice a year.</b></p> <p>6 <b>Most of the work is done behind the scenes in</b></p> <p>7 <b>evaluating individuals and issuing reports.</b></p> <p>8 Q But you'll agree with me that a big</p> <p>9 part of that practice is providing expert witness</p> <p>10 testimony?</p> <p>11 <b>A That's not correct.</b></p> <p>12 Q No? That's not a big part of your</p> <p>13 practice?</p> <p>14 <b>A If I testify twice a year, that's not a</b></p> <p>15 <b>big part of my practice. All the other time is</b></p> <p>16 <b>doing the work for the cases and evaluating the</b></p> <p>17 <b>individuals and issuing reports.</b></p> <p>18 Q What percentage of work do you devote</p> <p>19 to forensic psychology?</p> <p>20 <b>A As I stated yesterday, I say half and</b></p> <p>21 <b>half, clinical, half forensic, but I also have a</b></p> <p>22 <b>substantial amount of time that I use in the</b></p>	<p>4056</p> <p>1 instruct others on the use of expert testimony in</p> <p>2 court cases, correct?</p> <p>3 <b>A On the use and understanding trauma and</b></p> <p>4 <b>violence abuse in the courtroom and how to – for</b></p> <p>5 <b>advocates and people who could not have this level</b></p> <p>6 <b>of training or experience. How to come into the</b></p> <p>7 <b>courtroom and talk about very difficult issues of</b></p> <p>8 <b>domestic violence, yes.</b></p> <p>9 MR. DENNISON: Can we pull up PX 1241.</p> <p>10 Q Do you recognize that document?</p> <p>11 <b>A Yes, it looks like the front page of a</b></p> <p>12 <b>PowerPoint presentation.</b></p> <p>13 Q And it's a PowerPoint presentation</p> <p>14 given by whom?</p> <p>15 <b>A By myself and Mary Ann Dutton, who is a</b></p> <p>16 <b>very well-known and respected researcher and</b></p> <p>17 <b>clinician in the area of domestic violence.</b></p> <p>18 Q And what's the topic of the PowerPoint</p> <p>19 that you're giving?</p> <p>20 <b>A "Expert Witness Testimony in Cases</b></p> <p>21 <b>Involving Domestic Violence."</b></p> <p>22 Q Okay. And who did you give this</p>
<p>4055</p> <p>1 professional activities and serving on</p> <p>2 professional boards.</p> <p>3 Q So, what portion of your practice do</p> <p>4 you provide expert witness services?</p> <p>5 <b>A I think you're using the "expert</b></p> <p>6 <b>witness services" synonymous with the forensic</b></p> <p>7 <b>psychology part of the practice.</b></p> <p>8 <b>So, the forensic psychology practice,</b></p> <p>9 <b>what I do here today, is one part of it, and it's</b></p> <p>10 <b>a smaller part, as opposed to all the evaluations</b></p> <p>11 <b>and individuals that I'm assessing.</b></p> <p>12 Q Your practice is successful enough that</p> <p>13 you maintain your offices on Madison Avenue in New</p> <p>14 York, correctly [sic]?</p> <p>15 <b>A Correct. I've had that office since</b></p> <p>16 <b>2005.</b></p> <p>17 Q Right. And you're sufficiently</p> <p>18 successful at your forensic work that you're able</p> <p>19 to perform unpaid work at a hospital, correct?</p> <p>20 <b>A Correct. And I also do pro bono work</b></p> <p>21 <b>as well.</b></p> <p>22 Q All right. In fact, you actually</p>	<p>4057</p> <p>1 presentation to?</p> <p>2 <b>A That was to the National Clearinghouse</b></p> <p>3 <b>for the Defense of Battered Women. That is an</b></p> <p>4 <b>organization that provides legal services to women</b></p> <p>5 <b>who have assaulted or killed their partners in</b></p> <p>6 <b>self-defense, and mostly people who – these</b></p> <p>7 <b>individuals, the women who are being seen in</b></p> <p>8 <b>treatment through shelter-based programs or</b></p> <p>9 <b>through advocates, and those are individuals who</b></p> <p>10 <b>don't really know how to come into the courtroom</b></p> <p>11 <b>and talk, and that's what this presentation and</b></p> <p>12 <b>training was for.</b></p> <p>13 MR. DENNISON: I'm going to move</p> <p>14 PX 1241 into evidence.</p> <p>15 THE COURT: Any objection?</p> <p>16 MS. BREDEHOFT: No, Your Honor.</p> <p>17 THE COURT: All right. 1241 in</p> <p>18 evidence.</p> <p>19 Do you want to publish it?</p> <p>20 MR. DENNISON: Yeah, let's publish it</p> <p>21 to the jury, Your Honor.</p> <p>22 THE COURT: Okay.</p>



<p>4058</p> <p>1 MR. DENNISON: All right. Why don't we 2 pull up PX 1242. 3 Q Do you recognize this document? 4 A Yes. This also looks like a PowerPoint 5 presentation that I gave. 6 Q All right. What is the name of this 7 PowerPoint presentation? 8 A This is called "The Use of 9 Psychological Experts in Cases of Domestic 10 Violence." It was presented to the Kings County 11 Bar Association, which is in Brooklyn, and what 12 this presentation talked about was some of the 13 things that I talked to you all about yesterday, 14 the myths and misconceptions in intimate partner 15 violence, when women use force, what happens if 16 they drop protective orders, how they present in 17 court. And that's what this presentation was to 18 attorneys at the bar association. 19 Q Okay. But this is another presentation 20 that you gave as to the use of psychological 21 experts and you gave it to a bar association? 22 A Right. There were prosecutors and</p>	<p>4060</p> <p>1 much are you being paid? 2 A I'm being paid \$500 an hour. 3 Q \$500 an hour. And that's the bill you 4 set for your deposition, right, \$500 an hour? 5 A Correct. 6 Q All right. You submitted a number of 7 disclosures in this case. You have not formed an 8 opinion as to whether Mr. Depp committed intimate 9 partner violence against Ms. Heard, correct? 10 A Correct. I formed the opinion that 11 Ms. Heard's report of the intimate partner 12 violence is consistent with what we know in the 13 literature about intimate partner violence. 14 Q You have a limited role here comparing 15 individual data to group data, and then just 16 determining whether it's consistent, right? 17 A I wouldn't say it's a limited role, but 18 that's generally correct. 19 Q You used the word "limited role"? 20 A A limited role in terms on of how we go 21 about our forensic evaluation, not limited role in 22 this case.</p>
<p>4059</p> <p>1 defense attorneys in attendance at that bar 2 association. 3 Q Right. 4 Your deposition, you testified that you 5 were going to be paid a hundred dollars an hour 6 for your time in this case? 7 A I did not testify to that. 8 Q You did not? 9 A That's an error in the transcript. 10 Q Oh, that's not right? 11 A That's correct. 12 Q So and you corrected the transcript? 13 A We did not do an errata in the 14 transcript at this point. 15 Q So you knew there was an error in the 16 transcript, but you didn't fix it? 17 A There were several errors in the 18 transcript. 19 Q But you didn't fix any of them? 20 A There was no time to fix them. That's 21 correct. 22 Q You're not being paid \$100 an hour, how</p>	<p>4061</p> <p>1 Q Do you remember whether you used 2 limited role in your deposition? 3 A I don't. If you want it in front of 4 me, you probably think I did, but, sure. 5 Q And you have no independent knowledge 6 of the facts underlying the alleged abuse, 7 correct? 8 A I have the knowledge of the plethora of 9 documents that I've reviewed in this case. 10 Q I'm asking your independent, firsthand 11 knowledge. You have none of that, right? 12 A You mean whether I was there? 13 Q Yeah, you weren't there. 14 A Of course not. 15 Q Okay. And you're not testifying to the 16 veracity, the truthfulness of any of the 17 allegations? 18 A Correct. I'm testifying to the 19 consistency of the data points of all the 20 different documents, including the psychological 21 testing and the clinical evaluation that I 22 conducted of Ms. Heard, and how that comports with</p>

<p style="text-align: right;">4062</p> <p>1 the therapy records and all the other documents 2 and the photos and texts that I reviewed. 3 Q And you have no personal knowledge of 4 any abuse? 5 A <b>Correct, personally. Correct.</b> 6 Q Right. And all you know is what 7 Ms. Heard self-reported to you and others? 8 A <b>That's not correct.</b> 9 Q Because you did collateral interviews? 10 A <b>And I reviewed medical records and I</b> 11 <b>reviewed other witness statements of what they</b> 12 <b>witnessed and what they saw.</b> 13 Q And all of those statements that you 14 reviewed, those are statements that started with 15 Ms. Heard, correct? 16 A <b>Not necessarily.</b> 17 Q Well, the medical records did, didn't 18 they? 19 A <b>Well, the medical records, if she's</b> 20 <b>self-reporting what happened to her, sure. I</b> 21 <b>mean, that's what we do when we go to a physician.</b> 22 <b>We say, I have a headache. We're self-reporting</b></p>	<p style="text-align: right;">4064</p> <p>1 A <b>I had.</b> 2 Q So they already knew who you were, 3 right? 4 A <b>Correct.</b> 5 Q Right. And anytime that you were 6 working with Ms. Heard, or assessing Ms. Heard, 7 she could have chose to fire you, correct? 8 A <b>I suppose her legal team could have</b> 9 <b>chose to fire. I was not her -- she is not my</b> 10 <b>client. The legal team is the one who hires me.</b> 11 <b>I am responsible to the legal team, not Ms. Heard.</b> 12 Q And this legal -- and the legal team 13 that hired you already knew who you were because 14 you worked together previously? 15 A <b>Including they knew of my expertise in</b> 16 <b>this area of intimate partner violence and</b> 17 <b>traumatic stress, which is why they contacted me</b> 18 <b>to work on this matter.</b> 19 Q All right. Several times yesterday you 20 used language about assessing Ms. Heard's 21 relationship with Mr. Depp. 22 Do you remember talking about that?</p>
<p style="text-align: right;">4063</p> <p>1 <b>our difficulties.</b> 2 Q And everything Ms. Heard reported 3 directly to you was after she was sued by Mr. Depp 4 in this case, correct? 5 A <b>Correct.</b> 6 Q And you didn't meet Ms. Heard until, 7 what, September 2019? 8 A <b>That was the first evaluation</b> 9 <b>appointment, correct.</b> 10 Q All right. How did you get engaged? 11 A <b>Engaged?</b> 12 Q How did you get hired to do this work? 13 A <b>Oh. I was contacted by the legal team.</b> 14 Q Were you interviewed by her legal team 15 as to whether you were going to testify here? 16 A <b>I was not.</b> 17 Q You were not interviewed? 18 A <b>I was not.</b> 19 Q You were contacted? 20 A <b>Correct.</b> 21 Q Had you worked with that legal team 22 before?</p>	<p style="text-align: right;">4065</p> <p>1 A <b>Sure.</b> 2 Q You can't assess a relationship without 3 talking to both parties, can you? 4 A <b>You certainly can get a lot of</b> 5 <b>information from one party, absolutely.</b> 6 Q But -- 7 A <b>Especially when it is buttressed by</b> 8 <b>other documents, including four years of therapy</b> 9 <b>records and couples therapy records. You can get</b> 10 <b>a lot of information based on those documents and</b> 11 <b>contemporaneous reports of the relationship.</b> 12 Q Respectfully, I didn't ask whether you 13 get a lot of information. I asked whether you can 14 assess a relationship without talking to both 15 parties? 16 A <b>I believe you can. There are certainly</b> 17 <b>limitations inherent in that, but you certainly</b> 18 <b>can.</b> 19 Q You talked to Ms. Heard for, what, 20 approximately 30 hours, right? 21 A <b>Correct.</b> 22 Q How long did you spend with Mr. Depp?</p>

<p>4066</p> <p>1 A I did not spend any time with Mr. Depp. 2 It was my understanding that he did not sit for a 3 psychological evaluation. 4 Q Right. In fact, you've never met 5 Mr. Depp, have you? 6 A I have not. 7 Q But you purport to be able to assess 8 the relationship between Mr. Depp and Ms. Heard? 9 A But I also read Mr. Depp's transcripts 10 of his testimony. I watched his deposition 11 testimony. I reviewed his medical records. I 12 reviewed his text messages. So it's not 13 necessarily totally blind. I did have 14 information, although I'm not making a conclusion 15 about Mr. Depp himself. 16 Q Is the standard, now, not necessarily 17 totally blind? Is that how you assess the 18 relationship? If it's not necessarily totally 19 blind, I can assess it? 20 A No. We assess, as clinical 21 psychologists, relationships all the time. That's 22 what we're trained to do. Certainly someone who</p>	<p>4068</p> <p>1 A I believe she was not in treatment with 2 Dr. Jacobs at the time the Australian incident 3 occurred, so that would be correct. She did reach 4 out to Dr. Connell Cowan about Australia, who she 5 was treating with at that time, contemporaneously. 6 Q I'll ask you about Dr. Cowan. We'll 7 get there. 8 A Okay. 9 Q So you know that Ms. Heard stopped 10 seeing Dr. Jacobs in August 2014? 11 A That's correct. 12 Q She didn't go back until after she got 13 sued, right? 14 A I believe that's the date. I'd have to 15 look to make sure. But I believe that you're 16 correct. 17 Q All right. And you said you reviewed 18 Dr. -- you interviewed Dr. Connell Cowan? 19 A That's correct. 20 Q You also reviewed his deposition 21 testimony? 22 A That's correct.</p>
<p>4067</p> <p>1 has been trained in intimate partner violence to 2 understand and look for the dynamics that happen 3 in that relationship, and then when we have 4 external data that supports what the individual is 5 telling us, way before this legal case even came 6 on the scene, that becomes very strong data to 7 support that conclusion. 8 Q Let's talk about some of that data. 9 A Sure. 10 Q All right? 11 You chose to conduct some collateral 12 interviews -- 13 A Correct. 14 Q -- right? 15 And you interviewed Dr. Bonnie Jacobs? 16 A Correct. 17 Q And you looked at her notes? 18 A Correct. 19 Q And you know that Ms. Jacobs, 20 Dr. Jacobs, doesn't note anything about the 21 version of what happened in Australia until 22 Ms. Heard had already been sued, correct?</p>	<p>4069</p> <p>1 Q And you know that when -- that he 2 testified when he was treating a patient, he 3 assumes the patient is telling the truth, correct? 4 A I believe he said something to that 5 effect in his deposition. If he has no reason to 6 believe otherwise. If there's no other data to 7 believe otherwise, that your patient's not being 8 totally honest with you, then you believe what 9 they're saying. 10 Q Right. No other data to believe 11 otherwise. 12 But the sole thing that's happening is 13 Ms. Heard is talking to Mr. Cowan, or Dr. Cowan? 14 A I wouldn't say she's talking to him. 15 She's going to him for therapy and he's using his 16 clinical psychological expertise to understand the 17 connection between her symptoms and what she's 18 reporting, what's going on in her life. 19 Q But you understand that he testified 20 that he assumes the patient is telling the truth? 21 A Again, I understand that statement in 22 his testimony. I have a lot more rich</p>

Transcript of Jury Trial - Day 15  
Conducted on May 4, 2022

11 (4070 to  
4073)

<p style="text-align: right;">4070</p> <p>1 information, having spoken to him for two hours 2 and reviewing his clinical notes. 3 Q He testified he was making a leap of 4 faith with respect to that, right? With respect 5 to the truthfulness? 6 A Again, that was not my understanding of 7 speaking with him and reviewing his notes. I'm 8 aware that he testified something to that effect. 9 Q Right. And you testified yesterday 10 that Dr. Cowan never diagnosed Ms. Heard with any 11 personality orders. 12 Do you remember that? 13 A Yes. 14 Q In fact, Dr. Cowan's deposition 15 testimony reflects the fact that he doesn't make 16 diagnoses, correct? 17 A Correct. And I asked him, 18 specifically, did he have any indications that 19 even if he doesn't, as his practice, use them, 20 does she meet criteria for a personality disorder, 21 and he told me she did not. 22 Q All right. So you asked him,</p>	<p style="text-align: right;">4072</p> <p>1 and that's what made him, him, Dr. Cowan, 2 concerned, because in those moments, when he was 3 not controlled, that he could accidentally 4 seriously hurt Ms. Heard. 5 Q Let's do this again. 6 Ms. Heard told Dr. Cowan that Mr. Depp 7 was poorly controlled, correct? 8 A That's not correct. 9 Q Okay. He determined that from the 10 treatment he was providing Ms. Heard? 11 A And he also had a couples session with 12 Mr. Depp, and he also had correspondence with 13 Dr. Kipper. So he had other information as to 14 Mr. Depp's functioning. 15 Q All right. You talked about Dr. Banks. 16 A Correct. 17 Q Dr. Banks was doing relationship 18 consulting, right, consultation on relationship? 19 A Correct. 20 Q And Dr. Banks only met with him once? 21 A Correct. 22 Q And you did an interview, I think, with</p>
<p style="text-align: right;">4071</p> <p>1 specifically, with respect to a topic that you 2 haven't disclosed in your expert report, and then 3 he made a conclusion that's reflected in no 4 document? 5 A It's reflected in my notes. It's 6 reflected in his notes, about what he's treating. 7 He's treating the symptoms. He's not focusing on 8 the diagnosis, but he is treating the symptoms. 9 Q You talked about Dr. Cowan's concern 10 for Ms. Heard's safety. 11 A Correct. 12 Q He wasn't talking about her physical 13 safety, was he? 14 A Yes, he was. 15 Q No, he was talking about her emotional 16 safety. Wasn't that what he was talking about? 17 A He was concerned for both. 18 Q Okay. Did Dr. Cowan testify that he 19 never had the feeling that Johnny intended to hurt 20 Ms. Heard? 21 A I believe he said that. I mean, he 22 talked about Mr. Depp being very poorly controlled</p>	<p style="text-align: right;">4073</p> <p>1 Ms. Heard's mother, Paige? 2 A That's correct. 3 Q All right. You'd agree with me that a 4 person's family member is not the most objective 5 source of information? 6 A Sometimes you have to certainly control 7 for that, that the person may be wanting to be 8 protective of their daughter, of course. 9 Q And you interviewed Ms. Paige Heard 10 after Mr. Depp had already sued Amber Heard? 11 A Right. The entirety of my work in this 12 case happened, obviously, after the lawsuit. 13 Q Did you review, in that context, any of 14 Paige Heard's text messages with Mr. Depp? 15 A I'm not sure if I saw them with 16 Mr. Depp. I do believe I saw some with Ms. Heard. 17 I mean, Ms. Heard, Ms. Paige Heard, Amber Heard's 18 mother did talk with me about her relationship 19 with Mr. Depp. 20 Q And she told you that she loved Johnny, 21 even after Amber's alleged abuse, correct? 22 A She did.</p>

Transcript of Jury Trial - Day 15  
Conducted on May 4, 2022

12 (4074 to  
4077)

<p style="text-align: right;">4074</p> <p>1 Q All right. Now, you testified that you 2 approach a forensic evaluation with, I think you 3 said it again today, a healthy degree of 4 skepticism? 5 A Correct. 6 Q All right. This skepticism didn't 7 cause you to conduct interviews with, for 8 instance, Laurel Anderson? 9 A Right. I did not speak to Dr. Laurel 10 Anderson. 11 Q And you chose not to speak to 12 Dr. Laurel Anderson because you disagreed with 13 Dr. Laurel Anderson? 14 A That's not correct. 15 Q All right. What did Dr. Laurel 16 Anderson do on behalf of Ms. Heard and Mr. Depp? 17 A She was a couples therapist that they 18 sought. They had four couples sessions, as I 19 stated yesterday, one of them in which Mr. Depp 20 stormed out of. She did have a long, I guess, 21 evaluation or interview with Mr. Depp individually 22 and with Ms. Heard individually. And then she saw</p>	<p style="text-align: right;">4076</p> <p>1 almost 20 or 30 years, correct? 2 A Up until this point, I believe she 3 said. 4 Q Right. I know that you testified that 5 you reviewed medical records. 6 A Yes. 7 Q All right. So, you know Ms. Heard had 8 a personal nurse? 9 A Correct. 10 Q Erin Falati? 11 A Correct. 12 Q You didn't interview Ms. Falati either? 13 A I did not. 14 Q You know she spent time with Ms. Heard 15 on a regular basis during her relationship with 16 Mr. Depp? 17 A Correct. I had her clinical notes that 18 I reviewed. 19 Q Right. And you reviewed her deposition 20 testimony? 21 A Correct. 22 Q Some of which the jury's heard, right?</p>
<p style="text-align: right;">4075</p> <p>1 them intermittently after the May 21st, 2016 2 incident, when they were filing for divorce. 3 Q So, you didn't interview Laurel 4 Anderson, but you know what she did. 5 How did you figure that out? 6 A Because we had her redacted notes and 7 her deposition. 8 Q All right. And you understood, from 9 her deposition, that Dr. Anderson didn't believe 10 Ms. Heard to be a victim of spousal abuse? 11 A I believe those were her words, yes. 12 Q And you also understood, from her 13 deposition, that Mr. Depp had not had a very long 14 history of being violent with any of his wife or 15 women? 16 A She said that as well. 17 Q Yeah. 18 A But that something about Ms. Heard 19 significantly triggered him. She talked about 20 that as well. 21 Q Dr. Anderson thought that Mr. Depp had 22 been, her words, "well-controlled," I think for</p>	<p style="text-align: right;">4077</p> <p>1 A I believe so. 2 Q You reviewed the nursing notes? 3 A Yes. 4 Q So you know that Ms. Heard admitted to 5 a history of eating disorders to Ms. Falati, 6 correct? 7 A I know that's in the notes. That's 8 nowhere else in any other record, so I'm not sure 9 where that came from. 10 Q But you relied on everybody else's 11 notes? 12 A And there are some things that I 13 disagreed with. Like I disagree with Dr. Laurel 14 Anderson about it being mutual abuse. 15 Q Right. So the stuff you disagree with, 16 you disregard, and the rest you keep, correct? 17 A Well, that's not correct. 18 Q But that's what you did. 19 A That's not correct. 20 Q All right. You know that Ms. Falati 21 summons her immediately after she returned from 22 Australia?</p>

<p style="text-align: right;">4078</p> <p>1     <b>A</b>   I'd have to look at the notes again to 2   be sure, but I know she did see her when she came 3   back from Australia, that's correct. 4     <b>Q</b>   Did Ms. Falati document any injuries to 5   Ms. Heard in her notes? 6     <b>A</b>   <b>I did not see that in the record.</b> 7     <b>Q</b>   Okay. So you looked at her notes and 8   there's no injury to Ms. Heard documented in her 9   nurse's notes following her return from Australia? 10   <b>A</b>   <b>Correct.</b> 11    <b>Q</b>   Okay. You talked about this concept, 12   which you then defined, "lethality." 13       And you testified there are certain 14   factors that are present in relationships where 15   the woman ends up murdered by her partner? 16   <b>A</b>   <b>Correct.</b> 17    <b>Q</b>   All right. And that's one of the ways 18   you look as to whether a woman is in a very 19   dangerous situation? 20   <b>A</b>   <b>Correct.</b> 21       MR. DENNISON: Can we pull up PX 92. 22       THE COURT: It's in evidence.</p>	<p style="text-align: right;">4080</p> <p>1     <b>A</b>   <b>Yes, I do.</b> 2     <b>Q</b>   And you specifically talked about 3   Mr. Depp displaying jealousy regarding the actor 4   James Franco? 5     <b>A</b>   <b>Correct.</b> 6     <b>Q</b>   Now, the very first time you met with 7   Ms. Heard, she talked to you about Ms. Franco -- 8   Mr. Franco, James Franco, correct? 9     <b>A</b>   <b>I don't know if it was the first time,</b> 10   <b>but I did ask about some other relationships.</b> 11    <b>Q</b>   Okay. So why don't we do this. 12       MR. DENNISON: Let's go to PX 1246. I 13   just want to go to the first page. All right. 14    <b>Q</b>   So, do you recognize the document 15   that's in front of you? 16   <b>A</b>   <b>Yes.</b> 17    <b>Q</b>   All right. And what I would like to 18   do -- what is it? 19   <b>A</b>   <b>It's one -- a top sheet of a background</b> 20   <b>information questionnaire that I use to help guide</b> 21   <b>the evaluation.</b> 22    <b>Q</b>   Okay. So, now, who filled it out?</p>
<p style="text-align: right;">4079</p> <p>1       MR. DENNISON: Can we publish it to the 2   jury? 3       THE COURT: It will be published. 4     <b>Q</b>   Do you know what this is? 5     <b>A</b>   <b>I believe this is the knife that</b> 6   <b>Ms. Heard gave to Mr. Depp as a gift.</b> 7     <b>Q</b>   All right. And do you speak Spanish? 8     <b>A</b>   <b>Un Poquito.</b> 9     <b>Q</b>   Do you know what it says? 10    <b>A</b>   <b>Yes, it says "hasta la muerte," until</b> 11   <b>death.</b> 12    <b>Q</b>   So, a woman you suggest has 13   characteristics of being afraid for her life gives 14   her intimate partner a large knife, which she has 15   inscribed "until death." 16       That's your testimony? 17    <b>A</b>   <b>Well, there's context.</b> 18    <b>Q</b>   Okay. We can do that later. 19       So, we talked about -- you talked a 20   little about Mr. Depp purporting to demonstrate 21   jealousy with Ms. Heard. 22       Do you recall that?</p>	<p style="text-align: right;">4081</p> <p>1     <b>A</b>   <b>I filled it out.</b> 2     <b>Q</b>   Whose form is it? 3     <b>A</b>   <b>My form.</b> 4       MR. DENNISON: I'll going to move just 5   the first page into evidence because we're going 6   to talk about other portions of it later. 7       THE COURT: Could you back out so she 8   can see the whole first page. 9       Any objection? 10    MS. BREDEHOFT: Your Honor, I would 11   want the whole thing in. 12    THE COURT: Okay. 13    MR. DENNISON: We will admit the whole 14   thing into evidence. 15    THE COURT: You want the whole thing 16   into evidence? 17    MS. BREDEHOFT: No objection, 18   whatsoever. 19    THE COURT: All right. 1246 in 20   evidence, in full. 21       Are there any identifiers that need -- 22   or we're just going?</p>

<p>4082</p> <p>1 MS. BREDEHOFT: Yeah, I'm sure there's 2 going to be some. 3 THE COURT: All right. So you owe me a 4 redacted one, correct? 5 MR. DENNISON: Don't know what the 6 nature of the redactions are going to be, but... 7 MS. BREDEHOFT: We'll work with him on 8 that. 9 THE COURT: Okay. Thank you. 10 MS. BREDEHOFT: I'm positive there are 11 identifiers in there. 12 MR. DENNISON: All right. 13 1246 has been moved into evidence. 14 Can we blow up the bottom right-hand 15 corner? 16 THE COURT: All right. Do you want to 17 publish it to the jury? 18 MS. BREDEHOFT: Your Honor, I'm not 19 comfortable publishing it to the jury if there's 20 identifiers. I'm happy to do it on a break to 21 make sure -- 22 MR. DENNISON: I don't see any on the</p>	<p>4084</p> <p>1 Q Says "friends," but you put him under 2 intimate relationships? 3 A <b>Well, there's a line there because I 4 was asking specifically about other things that 5 were allegations in this matter.</b> 6 Q There's a line there because you did 7 not believe that it should go under intimate 8 relationships but it's on your form? 9 A <b>She wasn't telling me that this was an 10 intimate relationship. I queried as to what's 11 going on with James Franco because that was 12 something that was raised in this case.</b> 13 Q All right. And there's a note for 14 December 2015. 15 A <b>When they became more friends, more 16 friendly.</b> 17 Q Right. And that was a period of time 18 in which Ms. Heard was married to Mr. Depp, 19 correct? 20 A <b>Correct.</b> 21 Q So she became close with Mr. Franco in 22 December 2015, and at least you put it under</p>
<p>4083</p> <p>1 first page. 2 THE COURT: If you want to look at 3 that. Any objection to that? 4 MS. BREDEHOFT: Is that the whole page? 5 THE COURT: That's what they're going 6 to show. 7 MR. DENNISON: That's what we're going 8 to show. 9 MS. BREDEHOFT: All right. 10 THE COURT: All right. Publish, then. 11 Q So this is the bottom corner, your 12 notes. And it's under the section of your notes 13 that's entitled "intimate relationships." 14 A <b>Correct.</b> 15 Q Right. And one of the notes here on 16 the right says "JF." 17 That's James Franco, right? 18 A <b>Correct.</b> 19 Q Got close but really wanted to be with 20 Johnny. 21 A <b>Well, it says "JF friends." They were 22 friends.</b></p>	<p>4085</p> <p>1 intimate relationships? 2 A <b>With a line differentiating another 3 part of this document.</b> 4 Q Okay. Did you provide another header, 5 like a header that says "friends"? 6 A <b>No.</b> 7 Q No. Let's look at the next one. The 8 next one says -- I think it says "Elon." 9 A <b>Correct.</b> 10 Q That's Elon Musk, right? 11 A <b>Correct.</b> 12 Q All right. May 2016. 13 A <b>Correct.</b> 14 Q "Met him Met Ball." 15 A <b>Correct.</b> 16 Q That's a big, fancy party in New York, 17 right? 18 A <b>Yes, it is.</b> 19 Q All right. And she said she dated him 20 after Johnny? 21 A <b>Correct.</b> 22 Q She met Elon Musk in May 2016.</p>

Transcript of Jury Trial - Day 15  
Conducted on May 4, 2022

15 (4086 to  
4089)

<p>1 When did she file the TRO?</p> <p>2 <b>A The last incident was May 21st. I</b></p> <p>3 <b>believe it was May 26th, 27th, if I'm correct.</b></p> <p>4 Q When did she start dating Elon Musk?</p> <p>5 <b>A Sometime after that.</b></p> <p>6 Q All right. Sometime after the TRO?</p> <p>7 <b>A I believe so, yes.</b></p> <p>8 Q Okay. You talked --</p> <p>9 MR. DENNISON: We can take that down.</p> <p>10 Q You talked quite a lot yesterday about</p> <p>11 this concept of reactive violence.</p> <p>12 <b>A Yes.</b></p> <p>13 Q Yeah. So, just so I understand your</p> <p>14 position on this, is it your position that if</p> <p>15 Ms. Heard was abused, she gets to hit Mr. Depp?</p> <p>16 <b>A That's not my opinion.</b></p> <p>17 Q But you know she hits him, right?</p> <p>18 <b>A And I testified to that.</b></p> <p>19 Q Right. And how many times do you</p> <p>20 believe that she told you that she hit him?</p> <p>21 <b>A Do I believe that she told me or how</b></p> <p>22 <b>many instances were there?</b></p>	<p>1 no, I said to you, hey, tell Travis what just</p> <p>2 happened. You remember?</p> <p>3 MS. HEARD: You told me to do it. You</p> <p>4 told me to. You said, "Go do that."</p> <p>5 MR. DEPP: I said, no, tell him what</p> <p>6 just happened.</p> <p>7 MS. HEARD: And I lied.</p> <p>8 MR. DEPP: And that you punched me in</p> <p>9 the fuckin' --</p> <p>10 MS. HEARD: You're right.</p> <p>11 MR. DEPP: -- thing --</p> <p>12 MS. HEARD: You figured it out.</p> <p>13 MR. DEPP: -- in the face. And you</p> <p>14 said, "No, fucking, I didn't. What the fuck are</p> <p>15 you talking about?" And I watched you lie.</p> <p>16 MS. HEARD: I didn't punch you.</p> <p>17 MR. DEPP: And then I -- I.</p> <p>18 MS. HEARD: I didn't punch you, by the</p> <p>19 way. I'm sorry that I didn't hit you across the</p> <p>20 face in a proper slap. But I was hitting you. I</p> <p>21 was not punching you.</p> <p>22 Babe, you're not punched.</p>
<p>1 Q Well, I don't know. How would you know</p> <p>2 other than her telling you? You weren't there,</p> <p>3 right?</p> <p>4 <b>A I was not there, that's correct.</b></p> <p>5 Q All right. How many times did she</p> <p>6 admit to hitting him?</p> <p>7 <b>A She indicated a number of times and a</b></p> <p>8 <b>number of instances.</b></p> <p>9 Q You indicated that you had listened to</p> <p>10 audio recordings as part of work you did in this</p> <p>11 case?</p> <p>12 <b>A That's correct.</b></p> <p>13 Q All right. I would like to play a</p> <p>14 portion of one of those recordings. It's</p> <p>15 Plaintiff's Exhibit 343. It's already in</p> <p>16 evidence.</p> <p>17 MR. DENNISON: And for the record, the</p> <p>18 portion I want to play is 2 minutes 46 -- 2:46:01</p> <p>19 to 2:47:20.</p> <p>20 (Whereupon, the following audio</p> <p>21 recording was played.)</p> <p>22 MR. DEPP: I said to Travis, I said --</p>	<p>1 MR. DEPP: Don't tell me what it feels</p> <p>2 like to be punched.</p> <p>3 MS. HEARD: You know you've been in a</p> <p>4 lot of fights. You've been around a long time.</p> <p>5 And I know.</p> <p>6 MR. DEPP: No. When you fuckin' have a</p> <p>7 closed fist --</p> <p>8 MS. HEARD: You didn't get punched.</p> <p>9 You got hit. I'm sorry I hit you like this, but I</p> <p>10 did not punch you. I did not fucking deck you. I</p> <p>11 fucking was hitting you.</p> <p>12 MR. DEPP: You can't --</p> <p>13 MS. HEARD: I don't know what the</p> <p>14 motion of my actual hand was, but you're fine. I</p> <p>15 did not hurt you. I did not punch you. I was</p> <p>16 hitting you.</p> <p>17 MR. DEPP: Now you're talking.</p> <p>18 MS. HEARD: What am I supposed to do,</p> <p>19 do this? I'm not sitting here bitching about it,</p> <p>20 am I? You are.</p> <p>21 That's the difference between me and</p> <p>22 you. You're a fucking baby.</p>



Transcript of Jury Trial - Day 15  
Conducted on May 4, 2022

16 (4090 to  
4093)

4090	4092
<p>1 MR. DEPP: Because you start --</p> <p>2 MS. HEARD: You are such a baby. Grow</p> <p>3 the fuck up, Johnny.</p> <p>4 MR. DEPP: Did you start physical</p> <p>5 fights.</p> <p>6 MS. HEARD: I did start physical</p> <p>7 fights.</p> <p>8 MR. DEPP: Yeah, you did. So I had to</p> <p>9 get the fuck out of there.</p> <p>10 MS. HEARD: Because -- yes, you did.</p> <p>11 You did the right thing, the big thing.</p> <p>12 You know what, you are admirable.</p> <p>13 (Whereupon, the audio recording ended.)</p> <p>14 BY MR. DENNISON:</p> <p>15 Q Do you agree with Ms. Heard that it's</p> <p>16 admirable to retreat from a fight?</p> <p>17 A Is it admirable? It is admirable to</p> <p>18 retreat from a fight.</p> <p>19 Q Anything about this tape suggest to you</p> <p>20 that it's characteristic of reactive violence?</p> <p>21 A In this instance, if true, if she said</p> <p>22 she hit him first, then that would not be reactive</p>	<p>1 A Correct.</p> <p>2 Q And you reviewed photographs?</p> <p>3 A Correct.</p> <p>4 Q So, other than the reports to her</p> <p>5 therapists, which you call "medical records,"</p> <p>6 right?</p> <p>7 A Yeah, I would call those medical</p> <p>8 records, sure.</p> <p>9 Q Other than the reports to her</p> <p>10 therapists, there's not a single medical record</p> <p>11 that reflects any injury to Ms. Heard, is there?</p> <p>12 A That's not correct.</p> <p>13 Q All right. There is not a -- other</p> <p>14 than -- what doctor reflected injuries to</p> <p>15 Ms. Heard?</p> <p>16 A The note by Erin Boreum, her married</p> <p>17 name is Falati, I'm not recalling her married</p> <p>18 name, indicated that she was headbutted by</p> <p>19 Mr. Depp and that she went for a concussion check</p> <p>20 and she had a busted lip, and then she went to</p> <p>21 Dr. Kipper's office in order to get checked.</p> <p>22 Q And there's a medical record other than</p>
4091	4093
<p>1 violence.</p> <p>2 Q All right. You testified that</p> <p>3 Ms. Heard reported to you that she engaged in low</p> <p>4 levels of violence, correct?</p> <p>5 A Well, I don't think she said that. I</p> <p>6 think that was the characterization of knowing the</p> <p>7 types of minor and severe levels of violence.</p> <p>8 Q Okay. I got it wrong.</p> <p>9 You considered it low levels of</p> <p>10 violence?</p> <p>11 A Well, I considered that the literature</p> <p>12 and the research talks about low levels of</p> <p>13 violence as opposed to severe levels of violence.</p> <p>14 Q And I think you suggested that</p> <p>15 Ms. Heard sustained more severe injuries, correct?</p> <p>16 A I think I said more frequent injuries.</p> <p>17 Q More frequent but not more severe?</p> <p>18 A Well, certainly the incidence in</p> <p>19 Australia and the sexual violence and the</p> <p>20 incidence on December 15, 2015, were quite severe.</p> <p>21 Q You said you reviewed medical records</p> <p>22 in rendering your opinion?</p>	<p>1 that note that reflects it?</p> <p>2 A There's a note that she showed up at</p> <p>3 Dr. Kipper's office. There's a note --</p> <p>4 Q But there's not a --</p> <p>5 A -- in there that Dr. Laurel Anderson</p> <p>6 saw the two bruises from that same incident as</p> <p>7 well.</p> <p>8 Q You reviewed photographs?</p> <p>9 A Yes.</p> <p>10 Q All right.</p> <p>11 MR. DENNISON: I'd like to put up</p> <p>12 PX 144. It's been published to the jury briefly.</p> <p>13 I'm going to keep it up very briefly.</p> <p>14 Q That photograph doesn't reflect a low</p> <p>15 level of violence, does it?</p> <p>16 A That reflects a severe injury; I would</p> <p>17 agree.</p> <p>18 Q Yeah.</p> <p>19 MR. DENNISON: Why don't we go to</p> <p>20 PX 145.</p> <p>21 Q That's a severe injury that ended up</p> <p>22 with Mr. Depp on a gurney, correct?</p>

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Conducted on May 4, 2022

17 (4094 to  
4097)

<p>4094</p> <p>1     <b>A   That is a severe injury, correct.</b></p> <p>2     Q   Yeah. All right.</p> <p>3         Is it your testimony that throwing a</p> <p>4 can of mineral spirits at your spouse is</p> <p>5 characteristic of reactive violence?</p> <p>6     <b>A   If you are running away from your</b></p> <p>7 <b>spouse who is trying to hurt you, yes.</b></p> <p>8     Q   All right. So you can throw a can of</p> <p>9 mineral spirits.</p> <p>10        What about if you throw a can of Red</p> <p>11 Bull?</p> <p>12    <b>A   Again, it depends on – the incident, I</b></p> <p>13 <b>think, that you're referring to, that was not</b></p> <p>14 <b>necessarily reactive violence. That was in a</b></p> <p>15 <b>state of frustration or anger.</b></p> <p>16    Q   So when you throw a can of Red Bull in</p> <p>17 the state of frustration or anger, that's not</p> <p>18 reactive violence?</p> <p>19    <b>A   No.</b></p> <p>20    Q   All right. What about if you throw a</p> <p>21 bottle of vodka because your husband fell off the</p> <p>22 wagon? Is that reactive violence?</p>	<p>4096</p> <p>1         Is it your testimony that once you've</p> <p>2 thrown the one bottle and missed, when you throw</p> <p>3 the second one, now it's reactive violence?</p> <p>4     <b>A   That's not what I'm saying. I don't</b></p> <p>5 <b>think throwing bottles is acceptable in any</b></p> <p>6 <b>context.</b></p> <p>7     Q   All right. I'm going to ask you about</p> <p>8 some of the testing that you did.</p> <p>9         One of the things that you did was a</p> <p>10 form, looked like, called a CTS2 Relationship</p> <p>11 Behaviors form.</p> <p>12    <b>A   On the Conflict Tactics Scale, correct.</b></p> <p>13    Q   So, "CTS2" stands for Conflict Tactics</p> <p>14 Scale?</p> <p>15    <b>A   That's correct.</b></p> <p>16    Q   And this is one of the documents that</p> <p>17 you had with you on the stand yesterday?</p> <p>18    <b>A   I had all my testing with me and all my</b></p> <p>19 <b>clinical notes from my evaluation with Ms. Heard.</b></p> <p>20    Q   And you gave me a copy of it because</p> <p>21 you looked at it during your testimony?</p> <p>22    <b>A   Because you asked me, so I gave it to</b></p>
<p>4095</p> <p>1     <b>A   Are you asking me hypothetically?</b></p> <p>2     Q   I'm asking you, would that be a</p> <p>3 characteristic of reactive violence, throwing a</p> <p>4 bottle of vodka because your husband fell off the</p> <p>5 wagon?</p> <p>6     <b>A   If it's in the middle of an assault,</b></p> <p>7 <b>perhaps. If it's independent of that, no.</b></p> <p>8     Q   Right. For instance, if your husband</p> <p>9 was just having a couple of shots at the bar?</p> <p>10    <b>A   Again, you would need more information</b></p> <p>11 <b>and context to make that determination.</b></p> <p>12    Q   You don't think that's a reflection of</p> <p>13 reactive violence.</p> <p>14        And you agree with me that when you</p> <p>15 throw the second bottle, that's not reactive</p> <p>16 violence?</p> <p>17    <b>A   If somebody's throwing multiple bottles</b></p> <p>18 <b>it can – psychological violence and abuse is</b></p> <p>19 <b>psychologically destabilizing, which destabilizes</b></p> <p>20 <b>individuals' coping strategies. That is</b></p> <p>21 <b>absolutely true.</b></p> <p>22    Q   Lost what's true.</p>	<p>4097</p> <p>1    you, yes.</p> <p>2     Q   Right. All right.</p> <p>3         But you have a recollection of what</p> <p>4 that test is about, the CTS2 test?</p> <p>5     <b>A   I have a very good memory and a very</b></p> <p>6 <b>good recollection. I want to give the jury the</b></p> <p>7 <b>most accurate and thorough information. Of having</b></p> <p>8 <b>done 12 tests with so many questions, I wanted to</b></p> <p>9 <b>just be as accurate as possible. I'm sure my</b></p> <p>10 <b>memory would miss some things that might be</b></p> <p>11 <b>relevant.</b></p> <p>12    Q   All right. So let's talk about the</p> <p>13 CTS2.</p> <p>14        It's dated 9/26/2019, 2019.</p> <p>15    <b>A   Correct.</b></p> <p>16    Q   9/26/2019. And it goes through and it</p> <p>17 asks a whole series of questions about what you've</p> <p>18 done and what your partner's done?</p> <p>19    <b>A   That's correct.</b></p> <p>20    Q   There's tons of these questions.</p> <p>21    <b>A   Correct.</b></p> <p>22    Q   And every single one of those questions</p>

Transcript of Jury Trial - Day 15  
Conducted on May 4, 2022

18 (4098 to  
4101)

<p style="text-align: right;">4098</p> <p>1 is preceded by the same question, right? How 2 often did this happen in the past year? 3 <b>A Correct.</b> 4 Q You knew that as of 9/26/2019, not a 5 single one of the things that Ms. Heard identified 6 happened to her in the last year? 7 <b>A Correct. She was oriented to a</b> 8 <b>different time frame to get a checklist of those</b> 9 <b>behaviors.</b> 10 Q And one of the -- although it says 11 please -- how often did this happen in the past 12 year, one of the questions is, "My partner used 13 force to make me have oral or anal sex"? 14 <b>A Correct.</b> 15 Q She wrote a zero on that, right? 16 <b>A I'd have to see, if you'd like to show</b> 17 <b>me.</b> 18 Q You have any recollection that she 19 didn't go to zero on that? 20 <b>A I have a recollection, at that point in</b> 21 <b>time, she was framing those type of acts as angry</b> 22 <b>sex.</b></p>	<p style="text-align: right;">4100</p> <p>1 page, and I think we are. This gold standard test 2 that I am referring to is the CAPS-5? 3 <b>A That is correct.</b> 4 Q That's the one that Dr. Curry 5 administered, correct? 6 <b>A Correct.</b> 7 Q All right. You didn't administer the 8 CAPS-5 until, A, after you had already diagnosed 9 Amber Heard with PTSD, right? 10 <b>A She had PTSD in 2019. She had PTSD in</b> 11 <b>the beginning of 2021, when I evaluated her. And</b> 12 <b>then she had PTSD in December 27, 2021, when I</b> 13 <b>administered the CAPS. That's correct.</b> 14 Q All right. I think I asked a much more 15 narrow question than that. 16 You didn't diagnose -- you didn't get 17 the CAPS-5 -- hold on. I'm going to strike that 18 question, altogether, and start it again. 19 You had already diagnosed her with PTSD 20 before you did the gold standard, correct? 21 <b>A Before I administered the CAPS-5, there</b> 22 <b>was enough data in the psychological testing and</b></p>
<p style="text-align: right;">4099</p> <p>1 Q Okay. 2 <b>A She wasn't framing them as physical</b> 3 <b>force, as most women don't on these measures.</b> 4 Q And you helped her to reframe it as 5 something other than angry sex, didn't you, 6 Doctor? 7 <b>A My job was not to do treatment. My job</b> 8 <b>was to do an evaluation, and that's what I did.</b> 9 Q All right. So you did an evaluation. 10 One of the evaluations you did and one of the 11 diagnoses that you ultimately made relates to 12 PTSD? 13 <b>A That is correct.</b> 14 Q All right. And you diagnosed Amber 15 Heard with PTSD long before you made use of the 16 gold standard test for PTSD? 17 <b>A That is correct.</b> 18 Q All right. 19 <b>A And I make the diagnosis of PTSD in my</b> 20 <b>clinical practice without using the CAPS, all the</b> 21 <b>time.</b> 22 Q Just so that you and I are on the same</p>	<p style="text-align: right;">4101</p> <p>1 <b>my clinical evaluation to establish that she met</b> 2 <b>criteria for PTSD; that is correct.</b> 3 Q You submitted an expert disclosure in 4 this case on January 11th, 2022? 5 <b>A I believe the attorneys submitted that</b> 6 <b>disclosure, yes.</b> 7 Q You participated in that? 8 <b>A In the January 11th? It was the same</b> 9 <b>disclosure that went before. There were no</b> 10 <b>changes on that.</b> 11 Q Did you reference the CAPS-5 in that at 12 all? 13 <b>A I don't believe I gave the results of</b> 14 <b>the CAPS-5 to the attorneys at that point.</b> 15 Q All right. You met with -- oh, I've 16 got dates here. This time I'm using the cheat 17 sheet. 18 You met with Amber Heard on 19 September 16th, 2019. 20 <b>A I would like to have my cheat sheet,</b> 21 <b>but I'll take your word for it.</b> 22 Q I'll share.</p>

Transcript of Jury Trial - Day 15  
Conducted on May 4, 2022

19 (4102 to  
4105)

4102	4104
<p>1     <b>A   Thank you.</b></p> <p>2     Q   October 11th, 2019.</p> <p>3         When did you give the CAPS-5?</p> <p>4     <b>A   The CAPS-5 was administered the last</b></p> <p>5 <b>time that I saw Ms. Heard. I saw her over, as</b></p> <p>6 <b>stated multiple times, over the past two and a</b></p> <p>7 <b>half years, and having not seen her in about a</b></p> <p>8 <b>year, to get an accurate assessment of her current</b></p> <p>9 <b>symptoms, having had all the background</b></p> <p>10 <b>information, the CAPS-5 is a great structured</b></p> <p>11 <b>clinical interview to do that.</b></p> <p>12    Q   You hadn't seen her for about a year</p> <p>13 before you gave her that test?</p> <p>14   <b>A   That is correct.</b></p> <p>15    Q   And you did it over Zoom?</p> <p>16   <b>A   That is correct.</b></p> <p>17    Q   All right.</p> <p>18         MR. DENNISON: Why don't we pull up</p> <p>19 PX 1247.</p> <p>20         MS. BREDEHOFT: Your Honor, this is a</p> <p>21 new one, so we don't have it. I'm just making a</p> <p>22 note.</p>	<p>1 first page to the jury.</p> <p>2         THE COURT: Do you wish to have it in</p> <p>3 evidence? Are you moving it into evidence?</p> <p>4         MR. DENNISON: Yes, I am.</p> <p>5         MS. BREDEHOFT: I'd like to have a copy</p> <p>6 of it before I --</p> <p>7         THE COURT: He's just publishing the</p> <p>8 first page. Any objection on the first page?</p> <p>9         MS. BREDEHOFT: I don't have any</p> <p>10 objection to the first page.</p> <p>11         THE COURT: Okay. First page in</p> <p>12 evidence.</p> <p>13         MS. BREDEHOFT: I think, Your Honor, in</p> <p>14 the future, they should, at a minimum, give us a</p> <p>15 copy of whatever they're putting in. I know --</p> <p>16         THE COURT: Could you put your</p> <p>17 microphone on? I'm just having --</p> <p>18         MS. BREDEHOFT: I'm sorry.</p> <p>19         I don't have the ability to scroll</p> <p>20 down, so I can't see the rest of this. It's a</p> <p>21 brand-new exhibit.</p> <p>22         THE COURT: I'm sure they'll get you a</p>
4103	4105
<p>1         MR. DENNISON: I'll get you a copy.</p> <p>2         THE COURT: Sure. It's just to the</p> <p>3 witness right now.</p> <p>4         MS. BREDEHOFT: Correct. But it would</p> <p>5 be nice to know how many pages there are.</p> <p>6         THE COURT: Okay.</p> <p>7         MR. DENNISON: Sure.</p> <p>8     Q   Dr. Hughes, you can actually help with</p> <p>9 that question. This is like more than 20 pages</p> <p>10 long, right?</p> <p>11   <b>A   It's about 20 pages.</b></p> <p>12    Q   Right.</p> <p>13         MR. DENNISON: Let's get a copy of it.</p> <p>14    Q   This is a series of questions that you</p> <p>15 used to test for PTSD?</p> <p>16   <b>A   Correct.</b></p> <p>17    Q   All right. And you recognize the first</p> <p>18 page, this is the first page that you filled out;</p> <p>19 that's your handwriting?</p> <p>20   <b>A   That's correct.</b></p> <p>21    Q   All right.</p> <p>22         MR. DENNISON: I'd like to publish the</p>	<p>1 copy of it.</p> <p>2         MS. BREDEHOFT: Thank you.</p> <p>3         THE COURT: That's fine.</p> <p>4         MR. DENNISON: I'd like to go to the</p> <p>5 second page.</p> <p>6         Can we put up the second page?</p> <p>7         THE COURT: Are you putting the second</p> <p>8 page into evidence?</p> <p>9         MR. DENNISON: Not yet.</p> <p>10         THE COURT: Then I can't put it up.</p> <p>11         MR. DENNISON: I'm sorry. I'd like the</p> <p>12 witness to see the second page.</p> <p>13         THE COURT: The witness can see the</p> <p>14 second page.</p> <p>15    Q   This is the second page. This is the</p> <p>16 instruction on how you do it?</p> <p>17   <b>A   Correct.</b></p> <p>18    Q   And then we'll go to the third page.</p> <p>19         MR. DENNISON: Let's let the witness</p> <p>20 see the third page.</p> <p>21    Q   Now, this is entitled "scoring."</p> <p>22   <b>A   Correct.</b></p>

Transcript of Jury Trial - Day 15  
Conducted on May 4, 2022

20 (4106 to  
4109)

<p>1 Q So when you score, you look at two 2 things, right, you look at frequency and 3 intensity? 4 A Correct. 5 Q All right. Those are the two factors 6 you use to score? 7 A Correct. 8 MR. DENNISON: Can we go to the fourth 9 page of this document, and just show it to the 10 witness. All right. 11 Q So, Dr. Hughes, this is a first page of 12 the CAPS B where, other than the identifying 13 information, where there's any input into the 14 document, correct? 15 A The CAPS-5. You said the CAPS B. 16 Q Yeah, I misspoke. 17 A Yes. This is the criterion A, which 18 means that in order to, as I said yesterday, to 19 obtain a diagnosis of PTSD, you have to have 20 sustained a very specific traumatic event. That's 21 the first deed to get through the door. 22 Q Okay.</p>	<p>4106 1 entirety of 1247 in? 2 MR. DENNISON: Yes. 3 THE COURT: Do you have a copy of 1247? 4 It's Exhibit 1247. 5 MS. BREDEHOFT: Your Honor, I don't 6 have the whole page in front of me. 7 THE COURT: Well, I mean, do you have 8 Plaintiff's Exhibit 1247? Plaintiff's 1247. I 9 don't have it either. 10 MR. DENNISON: It's Defendant's 1435. 11 THE COURT: 1435. Defendant's 1435. 12 MS. BREDEHOFT: I'll find it as quickly 13 as possible, Your Honor. 14 MR. DENNISON: Take your time. 15 THE COURT: Do you want to take a look 16 at the Court's copy? Would that be easier for 17 you? 18 MS. BREDEHOFT: Your Honor, it's 59 19 pages. What is he moving? I mean, I don't 20 think -- 21 THE COURT: I think he's moving -- are 22 you moving the entire document in?</p>
<p>4107 1 MR. DENNISON: Your Honor, I'm going 2 to -- I'd like to be able to get them a copy of 3 this. Is it too early to take that break? 4 THE COURT: A little bit. 5 MR. DENNISON: All right. I can do 6 something else. 7 THE COURT: All right. 8 MR. DENNISON: All right. 9 Q All right. So do you recognize the 10 first page -- or the fourth page of this document? 11 A Yes, I do. 12 Q And the handwriting on the fourth page 13 is yours? 14 A It's all my handwriting. 15 Q All right. The entirety of it is 16 yours. 17 MR. DENNISON: I'm going to move this 18 document into evidence, along with the first page. 19 And that one is what number? I think it is -- 20 THE COURT: You're still on 1247. 21 MR. DENNISON: 1247. 22 THE COURT: So you want to move the</p>	<p>4109 1 MR. DENNISON: Yeah, I'm going to move 2 the entire document into evidence. 3 MS. BREDEHOFT: I don't think I have an 4 objection to that. 5 THE COURT: No objection? 6 MS. BREDEHOFT: No objection. 7 THE COURT: Do you want to take a look 8 at the Court's copy or are you good? 9 MS. BREDEHOFT: I would, thank you. My 10 apologies, Your Honor. 11 THE COURT: That's fine. 12 MS. BREDEHOFT: No objection, Your 13 Honor. 14 THE COURT: All right. So, even though 15 I pulled it from Defendant's 1435, we want to make 16 this 1247, Plaintiff's, correct? 17 MR. DENNISON: Yes, Your Honor. Thank 18 you. 19 MS. BREDEHOFT: Did you want your copy 20 back? 21 THE COURT: I kind of need it. Thank 22 you. We'll just change the number on it. So it's</p>

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Transcript of Jury Trial - Day 15  
Conducted on May 4, 2022

21 (4110 to  
4113)

<p>4110</p> <p>1 1247. 2 1247 in evidence, Plaintiff's 1247 in 3 evidence, and now it can be published to the jury. 4 MR. DENNISON: Thank you. Why don't we 5 publish the fourth page, where we're talking 6 about. 7 Q All right. So, what this references is 8 the event you said was the worst, and what you 9 have filled in here, is three words, "IPV by 10 Johnny," right? 11 A Correct. 12 Q And then what happened is the next box, 13 and you've not written a single thing in the box, 14 right? 15 A Because I've already spent 20-some-odd 16 hours with Ms. Heard. I know what goes in that 17 box. If you look at the top, it says administered 18 the Life Events Checklist, among other structured 19 trauma screens. That screen had already been 20 conducted. 21 Q Right. But there's a box, on the gold 22 standard test, that asks what happened. And it</p>	<p>4112</p> <p>1 A And I knew that they would have my 2 clinical notes as well. 3 Q So they're supposed to parse through 4 your clinical notes so that they can figure out 5 what you chose to be the anchoring event? 6 A I didn't choose the anchor. The client 7 chooses the anchor to identify what the worst 8 event is for them. 9 Q You wrote "IPV by Johnny." That's what 10 you determined to be the anchoring event. 11 A When I asked Ms. Heard, once again, of 12 the traumatic events that she experienced in her 13 life, which one is the worst, this is what she 14 indicated. 15 Q Okay. But you provided no details with 16 respect to it? 17 A There are details -- plethora of 18 details in my 80-page, handwritten, single-spaced 19 clinical notes. 20 Q All right. Let's go to the next page. 21 All right. You felt it appropriate to 22 fill this page out, didn't you, Doctor?</p>
<p>4111</p> <p>1 says how old were you? How were you involved? 2 Who else was involved? Was anyone seriously 3 injured or killed? Was anyone in life danger? 4 And none of that information you 5 provide in your analysis on the CAPS-5? 6 MS. BREDEHOFT: Your Honor, I hesitate 7 to object, but that's very compound. 8 MR. DENNISON: It is. 9 THE COURT: Okay. I'll sustain the 10 objection. If you want to rephrase. 11 MR. DENNISON: We can do it the slow 12 way. 13 THE COURT: Okay. 14 Q The first question is, how old were 15 you? 16 A All of the information that would go in 17 that box is contained in my 80-plus clinical notes 18 of my evaluation of Ms. Heard up to this point. 19 It would have been incredibly redundant to do that 20 again here. 21 Q But you knew other people would review 22 this, didn't you?</p>	<p>4113</p> <p>1 A Well, these are the questions about the 2 symptoms. So I'm asking specific questions and 3 getting her responses. 4 Q Didn't you know this already? 5 A I was making sure, at this point, 6 having not seen her for a year, what is the trauma 7 expression at this time. It can change over time. 8 It could go away. It can get better. It can get 9 worse. 10 Q All right. 11 MR. DENNISON: Why don't we go a couple 12 more pages in. Let's go in to page 7 of 20. 13 Q Now, there are a couple of boxes that 14 you filled in on this. Let's look at item 5, B5. 15 You don't provide any indication of 16 what kind of triggers -- what kind of reminders 17 triggers these reaction? 18 A She answered that on the previous 19 questions. 20 Q All right. And you didn't provide any 21 answer as to how long does it take to recover? 22 A She has some difficulty recovering.</p>

<p>4114</p> <p>1 Q Okay. And then there's this question 2 that says "how often has this happened in the past 3 month, number of times"? 4 A Correct. 5 Q We've talked about how these things are 6 scored. You've got to look at frequency and 7 intensity, right? 8 A Correct. 9 Q And you left the frequency box blank? 10 A Well, no, she said several times a 11 month. Then that's what the frequency is. 12 Q And you didn't fill that frequency box 13 in at all? 14 A Because she told me it was frequently, 15 several times a month, which is one of the anchors 16 in coding the CAPS. 17 Q All right. Let's look at the next one. 18 The very next box. 19 Again, this is scored by frequency and 20 intensity? How often in the past month? 21 A Correct. 22 Pardon?</p>	<p>4116</p> <p>1 Again, you left it blank? 2 A If you look on the right-hand box, that 3 is where we are indicating the frequency and the 4 severity. If you can see where I circled 5 "moderate," it's happening more than twice a 6 month, that's where I'm indicating the frequency 7 of the symptom expression. 8 Q Okay. But aren't you skipping a step? 9 You're supposed to do intensity and frequency. 10 A And when somebody says it's happening 11 more than twice a month, that is a frequency 12 indicator. 13 Q All right. Let's go to the next box. 14 Again, we have "In the past month, how 15 many of the important parts of event have you 16 difficulty remembering? Number of important 17 aspects." 18 Didn't fill it out? 19 A Well, I listed two specific incidents 20 of where she indicates she has important aspects 21 that are missing. 22 Q But all you had to do was put a number</p>
<p>4115</p> <p>1 Q How often in the past month? You left 2 that one blank, again, right? 3 A She told me it happens at least twice a 4 week, so, certainly, I can multiply two times four 5 and put an eight. 6 Q You certainly could have written the 7 number two? 8 A But it wasn't two, if it's happening 9 two times a week. 10 Q All right. Two times a week times the 11 number of months, now you've got two digits 12 instead of one, right, that's all it took to write 13 that down? 14 A This is in a one-month period, so it 15 would have been a four-week period. 16 Q How often in the past month; that's 17 what it says? 18 A Correct. You said months. 19 Q You chose not to answer that question. 20 Let's look at the next page. Again, 21 scoring is frequency and intensity. How often in 22 the past month.</p>	<p>4117</p> <p>1 in here. You know you had to -- you knew how to 2 score this thing? 3 A Well, this measure actually doesn't get 4 scored by the frequency. 5 Q All right. You know something, you're 6 right. Let's look at the next one. 7 A I know I'm right. 8 Q The next one gets scored by the 9 frequency. That's blank, right? 10 A Well, I did not code it as a PTSD 11 symptom. 12 Q All right. Let's go to the next one. 13 "How much of the time in the past month 14 have you felt that way as a percentage"? 15 A Right. As you can see, I circled 20 to 16 30 percent of the time. 17 Q Right. 18 A I'm putting it on the right side, in 19 the box where I'm coding the instrument. 20 Q We're going to talk about the right 21 side in a minute. 22 You took issue with the way that</p>

<p>4118</p> <p>1 Dr. Curry did this test, didn't you?</p> <p>2 <b>A Correct.</b></p> <p>3 Q All right. But your test, in every</p> <p>4 instance where you're asked the number of times</p> <p>5 and to fill in the blank, you leave it blank?</p> <p>6 <b>A They're on the right side of the</b></p> <p>7 <b>document.</b></p> <p>8 Q All right. You want to talk about the</p> <p>9 right side of the document.</p> <p>10 Let's do that.</p> <p>11 After you did the CAPS-5 for the</p> <p>12 anchoring -- the three-word anchoring event, "IPV</p> <p>13 by Johnny," you went back through again and you</p> <p>14 said, you know, maybe I should consider childhood</p> <p>15 trauma as well, right?</p> <p>16 <b>A I wanted to test for the limits and</b></p> <p>17 <b>see -- at this point in time, Ms. Heard had had a</b></p> <p>18 <b>child, and sometimes when people have children,</b></p> <p>19 <b>their trauma gets evoked, and she's having those</b></p> <p>20 <b>symptoms as well. She already had, based on this</b></p> <p>21 <b>instrument, the PTSD from the interpersonal</b></p> <p>22 <b>violence. I wanted to see if there were any</b></p>	<p>4120</p> <p>1 <b>about childhood? Is that happening for you now as</b></p> <p>2 <b>well?</b></p> <p>3 Q All right. So there are a series of</p> <p>4 notations on the right-hand side.</p> <p>5 MR. DENNISON: Let's go to page 5 of 20</p> <p>6 in the test. All right.</p> <p>7 Why don't we highlight the right-hand</p> <p>8 notations that start under the word "childhood."</p> <p>9 All right.</p> <p>10 Q So the way you tested for childhood</p> <p>11 PTSD is to write a notation in the corner and</p> <p>12 answer a couple of questions? Same test?</p> <p>13 <b>A Well, I wasn't administering a whole</b></p> <p>14 <b>CAPS again. What I was doing was seeing, as we</b></p> <p>15 <b>know with people who have, what we call,</b></p> <p>16 <b>polyvictimization or re-victimization. Someone</b></p> <p>17 <b>could, in fact, meet criteria for the PTSD from</b></p> <p>18 <b>the domestic violence but then they're also</b></p> <p>19 <b>experiencing some symptoms as a result of the</b></p> <p>20 <b>childhood abuse. Both can occur.</b></p> <p>21 Q Right. But Mr. Depp isn't responsible</p> <p>22 for her childhood abuse?</p>
<p>4119</p> <p>1 <b>additional symptoms.</b></p> <p>2 Q Right. And you knew that she had had</p> <p>3 severe child abuse as a young person?</p> <p>4 <b>A That is correct.</b></p> <p>5 Q She grew up in a home full of heroin</p> <p>6 addicts, right?</p> <p>7 <b>A Opiate abuse, yes.</b></p> <p>8 Q And there was IPV between her parents?</p> <p>9 <b>A Correct.</b></p> <p>10 Q All right. And so, you wanted to make</p> <p>11 sure that there wasn't some impact with this</p> <p>12 childhood trauma in the diagnosis of PTSD?</p> <p>13 <b>A Yes.</b></p> <p>14 Q Right. And so you decided to give her</p> <p>15 the test again?</p> <p>16 <b>A Well, I didn't give it again. What's</b></p> <p>17 <b>called testing the limits. I went back to some of</b></p> <p>18 <b>the questions where she answered in the</b></p> <p>19 <b>affirmative and said, is this also happening</b></p> <p>20 <b>vis-à-vis your childhood abuse? Are you also</b></p> <p>21 <b>having intrusive thoughts and feelings of</b></p> <p>22 <b>childhood? Are you avoiding thinking about things</b></p>	<p>4121</p> <p>1 <b>A That is correct.</b></p> <p>2 Q Right. And the way you tested this</p> <p>3 childhood abuse PTSD is you made notations on the</p> <p>4 right-hand corner -- in the right-hand column of a</p> <p>5 form that you partially filled out for the "IPV by</p> <p>6 Johnny," right?</p> <p>7 <b>A I disagree with the "partially filled</b></p> <p>8 <b>out." The frequency was clearly filled out in the</b></p> <p>9 <b>box where we scored the CAPS. But, yes, I did</b></p> <p>10 <b>write about the childhood to the right of that</b></p> <p>11 <b>box.</b></p> <p>12 Q Okay. And that is the appropriate way</p> <p>13 that the gold standard test for PTSD for childhood</p> <p>14 trauma should be administered?</p> <p>15 <b>A If there were any affirmative, and I</b></p> <p>16 <b>needed to go further, I could have administered</b></p> <p>17 <b>another CAPS-5. There were not. I did not need</b></p> <p>18 <b>to do that.</b></p> <p>19 Q Okay. So you chose not to do a second</p> <p>20 CAPS-5 although you knew that she had suffered</p> <p>21 from severe childhood trauma?</p> <p>22 <b>A No. Because she wasn't suffering</b></p>



Transcript of Jury Trial - Day 15  
Conducted on May 4, 2022

24 (4122 to  
4125)

<p style="text-align: right;">4122</p> <p>1 symptoms at that point in time, PTSD symptoms from 2 the childhood trauma. 3 Q All right. 4 THE COURT: Mr. Dennison, are you 5 moving to a different topic now? 6 MR. DENNISON: I am. 7 THE COURT: This might be a great time 8 to take our morning break. 9 Ladies and gentlemen, we will take our 10 15-minute break. Please do not discuss this case 11 with anybody, don't do any outside research, okay? 12 Thank you. 13 (Whereupon, the jury exited the 14 courtroom and the following proceedings took 15 place.) 16 THE COURT: All right. We'll go ahead 17 and take -- 18 MS. BREDEHOFT: Your Honor, before we 19 take the break. 20 THE COURT: Yes. 21 MS. BREDEHOFT: May I get a copy of the 22 new exhibits from them so that I can see it over</p>	<p style="text-align: right;">4124</p> <p>1 (Whereupon, the jury entered the 2 courtroom and the following proceedings took 3 place.) 4 THE COURT: All right. Thank you. You 5 can be seated. 6 Next question. 7 MR. DENNISON: Why don't we put back up 8 Plaintiff's 1247. 9 BY MR. DENNISON: 10 Q Again, this is the CAPS-5. 11 You didn't administer this until you 12 already had Dr. Curry's scores, did you? 13 <b>A That's not correct.</b> 14 Q No? You administered it after 15 Dr. Curry made a disclosure, correct? 16 <b>A That's not correct.</b> 17 Q All right. You administered it after 18 Dr. Curry had administered hers? 19 <b>A I learned that in late February, when</b> 20 <b>she submitted her report, but I had no way of</b> 21 <b>knowing that in December 2021.</b> 22 Q All right. And you didn't make any</p>
<p style="text-align: right;">4123</p> <p>1 the break? 2 MR. DENNISON: I don't know if we can 3 do it before, but we'll certainly get them to you. 4 MS. BREDEHOFT: I mean, I need to be 5 able to redirect, and I have never seen these. 6 THE COURT: We'll go through it, that's 7 fine. All right? 8 MR. DENNISON: Although it's in your 9 exhibit list. 10 MS. BREDEHOFT: If it's in my exhibit 11 list, if they just tell me. 12 THE COURT: Tell you the exhibit 13 numbers. That's fine. We'll work through it. 14 Let's take a recess to 11:40, then, 15 okay? Back at 11:40. 16 THE BAILIFF: All rise. 17 (Recess taken from 11:27 a.m. to 18 11:42 a.m.) 19 THE BAILIFF: All rise. 20 Please be seated and come to order. 21 THE COURT: All right. Are we ready 22 for the jury? Okay.</p>	<p style="text-align: right;">4125</p> <p>1 reference to this in your disclosures until after 2 Dr. Curry made reference to hers, right? 3 <b>A I don't recall the date of the final</b> 4 <b>disclosure or the fourth disclosure.</b> 5 Q All right. 6 MR. DENNISON: Can we go to the next 7 page. Let's go to the top of the page and blow 8 that up. 9 Q The instructions start with "Standard 10 administration and scoring of the CAPS-5 are 11 essential for producing reliable and valid scores 12 and diagnostic decisions." 13 Do you see that language? 14 <b>A I do.</b> 15 Q You don't contend it's standard not to 16 fill out the frequency line? 17 <b>A I think if you're filling it out on the</b> 18 <b>right side of the box, I think that's perfectly</b> 19 <b>fine.</b> 20 Q You think it's standard administration 21 to simply leave blanks that are already in the 22 form?</p>

<p style="text-align: right;">4126</p> <p>1     <b>A</b>   I didn't leave blanks when I needed to 2   <b>find out the frequency of the symptoms.</b> 3     Q   All right. 4     MR. DENNISON: Let's go down a little 5   bit further. 6     Let's go to "administration." 7     Q   It says, number 2, "Read prompts 8   verbatim one at a time and in the order 9   presented," and then has a variety of exceptions. 10    With respect to the childhood trauma 11   notations you made in the margin of the CAPS-5, 12   you didn't read the prompts verbatim, did you? 13   <b>A</b>   I read the first prompt. If there was 14   a yes, then I would have made a decision, do I 15   need to administer a whole nother CAPS? 16    Q   Right. And you ultimately didn't do 17   that, you just simply wrote in the margin of the 18   last one? 19   <b>A</b>   Because she wasn't endorsing those 20   symptoms. 21    Q   You talked about endorsement of 22   symptoms.</p>	<p style="text-align: right;">4128</p> <p>1     <b>A</b>   She had a number of PTSD symptoms while 2   she was filming Aquaman 2. 3     Q   Right. 4     <b>A</b>   That interfered with her ability to 5   really organize a lot of resources for herself in 6   order to go forward and film that -- 7     Q   I asked you whether -- 8     <b>A</b>   -- production. 9     Q   -- I asked you whether she was 10   performing at the highest level of her profession, 11   yes or no? 12   <b>A</b>   I don't know if I'm qualified to answer 13   that. 14    Q   Okay. But did she report to you that 15   she loves to cook? 16   <b>A</b>   She loves to cook, yes. 17    Q   Hike? 18   <b>A</b>   I don't recall hiking, but... 19    Q   Read? 20   <b>A</b>   Yep. 21    Q   Spend time with friends? 22   <b>A</b>   If she can. That has been</p>
<p style="text-align: right;">4127</p> <p>1     Ultimately, what you're looking for, 2   with respect to PTSD, is functional deficiencies. 3   That's one of the things you look for, right? 4     <b>A</b>   Well, with any DSM diagnosis, you're 5   looking for what are the functional impairments as 6   a result of the symptoms that the individual is 7   experiencing. 8     Q   Okay. So and, in fact, if you go all 9   the way to the end of the form, one of the things 10   that we deal with is impairment in occupational 11   functioning, right? 12   <b>A</b>   Correct. 13    Q   All right. What's Ms. Heard's 14   occupation? 15   <b>A</b>   She's an actor. 16    Q   And she's in -- she had just wrapped a 17   major motion picture, correct? 18   <b>A</b>   That's correct. 19    Q   So you didn't determine that she had an 20   impairment in occupational function? 21     She's still performing at, literally, 22   the highest level of her profession, correct?</p>	<p style="text-align: right;">4129</p> <p>1   <b>significantly diminished [sic] as a result of her</b> 2   <b>PTSD symptoms and as a result of this case.</b> 3     Q   She just had a baby? 4     <b>A</b>   She did. 5     Q   Right? 6     Exercises every day? 7     <b>A</b>   The most that I can tell, she does. 8     Q   Yeah. Completed level 3 Sommelier 9   training? 10    <b>A</b>   She did. 11    Q   She did all of these things and you've 12   made a determination that she is impaired with 13   respect to her occupational functioning? 14    <b>A</b>   I made a determination that the 15   symptoms interfere with her functioning. She does 16   these things, but it's not like the symptoms 17   aren't there. She has to continue to work even 18   though she has a panic attack, even though she has 19   an intrusive recollection of the trauma, even 20   though she's having heart palpitations and sweaty 21   palms when something comes into her mind. It does 22   not stop her from doing what she needs to do. But</p>

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26 (4130 to  
4133)

<p>4130</p> <p>1 <b>it does interfere.</b></p> <p>2 Q Okay. So I'm going to ask you about</p> <p>3 another test that you administered, and that one's</p> <p>4 called the "PAI."</p> <p>5 Do you know that one?</p> <p>6 <b>A Yes, I do.</b></p> <p>7 Q That's the Personality Assessment</p> <p>8 Inventory?</p> <p>9 <b>A That's correct.</b></p> <p>10 MR. DENNISON: Why don't we mark -- why</p> <p>11 don't we put in front of the witness PX 1244.</p> <p>12 Your Honor, if I may approach.</p> <p>13 THE COURT: All right. 1244.</p> <p>14 MR. DENNISON: Here's her copy.</p> <p>15 THE COURT: Thank you.</p> <p>16 Q All right. So, Dr. Hughes, do you</p> <p>17 recognize PX 1244?</p> <p>18 <b>A Yes.</b></p> <p>19 Q And that's a list of critical item</p> <p>20 endorsements?</p> <p>21 <b>A Correct.</b></p> <p>22 Q And that's derived from the PAI?</p>	<p>4132</p> <p>1 just the first page?</p> <p>2 MS. BREDEHOFT: No.</p> <p>3 THE COURT: All right. 1244 in</p> <p>4 evidence.</p> <p>5 Q Okay. So critical item endorsement.</p> <p>6 This starts "A total of 27 PAI items reflecting</p> <p>7 serious pathology" have been very low endorsement</p> <p>8 rates -- "have very low endorsement rates in</p> <p>9 normal samples. These items have been termed</p> <p>10 critical items."</p> <p>11 You're familiar with that concept?</p> <p>12 <b>A Yes, I am.</b></p> <p>13 Q All right. I just want to ask you</p> <p>14 about a couple of the critical items.</p> <p>15 The first one is potential for</p> <p>16 aggression. This was deemed, under your PAI, a</p> <p>17 critical item. It says "Sometimes my temper</p> <p>18 explodes and I completely lose control."</p> <p>19 How did that potential for aggression</p> <p>20 bear on your analysis?</p> <p>21 <b>A Well, there's a few things. Number</b></p> <p>22 <b>one, certainly, Ms. Heard reported to me that in</b></p>
<p>4131</p> <p>1 <b>A Correct.</b></p> <p>2 Q And this is the PAI that you gave</p> <p>3 9/26/2019?</p> <p>4 <b>A I don't have the cover sheet in front</b></p> <p>5 <b>of me, so...</b></p> <p>6 MR. DENNISON: Why don't we scroll down</p> <p>7 to the bottom, Tom. There.</p> <p>8 <b>A Yeah.</b></p> <p>9 Q There it is, down there.</p> <p>10 <b>A Thank you.</b></p> <p>11 Q You bet.</p> <p>12 Okay. Now, critical item --</p> <p>13 MR. DENNISON: Your Honor, I'm going to</p> <p>14 move this document, PX 1244, into evidence.</p> <p>15 MS. BREDEHOFT: Your Honor, I would</p> <p>16 request that the entire document be put in, not</p> <p>17 just this piece.</p> <p>18 MR. DENNISON: I'm only going to ask</p> <p>19 her about this piece.</p> <p>20 MS. BREDEHOFT: I still would ask --</p> <p>21 THE COURT: Well, it's his exhibit. Do</p> <p>22 you have any objection to his exhibit, which is</p>	<p>4133</p> <p>1 <b>her relationship, that would happen, her anger and</b></p> <p>2 <b>her affect regulation would become impaired.</b></p> <p>3 <b>Number two, you have to look at the</b></p> <p>4 <b>total scales, where that scale is not elevated, so</b></p> <p>5 <b>it would not be a major cause of clinical concern.</b></p> <p>6 <b>Number three, she had four responses</b></p> <p>7 <b>that she could say for this question, mainly</b></p> <p>8 <b>true -- or very true, mainly true, sometimes true</b></p> <p>9 <b>or false. She chose "sometimes true."</b></p> <p>10 <b>So she's answering honestly about her</b></p> <p>11 <b>experience.</b></p> <p>12 Q Sometimes -- it's sometimes true that</p> <p>13 sometimes my temper explodes --</p> <p>14 <b>A Correct.</b></p> <p>15 Q -- that's what you're testifying?</p> <p>16 <b>A Correct.</b></p> <p>17 Q All right. So you've talked a little</p> <p>18 bit about this concept called malingering. And</p> <p>19 there's one here for potential malingering. And</p> <p>20 this is another one of these critical item</p> <p>21 endorsements.</p> <p>22 Critical items means that these are</p>

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27 (4134 to  
4137)

<p>4134</p> <p>1 serious pathology, right?</p> <p>2 <b>A Well, as you can see, it says</b></p> <p>3 <b>"endorsement of these critical items is not, in</b></p> <p>4 <b>and of itself, diagnostic."</b></p> <p>5 <b>So, you need to review the content of</b></p> <p>6 <b>the item and that's how you make the</b></p> <p>7 <b>determination, is this something of clinical</b></p> <p>8 <b>concern that you need to do more understanding</b></p> <p>9 <b>about?</b></p> <p>10 Q Okay. So this critical item</p> <p>11 endorsement, this one reads, under potential</p> <p>12 malingering, "I think I have three or four</p> <p>13 completely different personalities inside of me."</p> <p>14 <b>A Correct.</b></p> <p>15 Q And she endorsed that as sometimes</p> <p>16 true?</p> <p>17 <b>A Correct.</b></p> <p>18 Q Okay.</p> <p>19 <b>A And there's not one elevated</b></p> <p>20 <b>malingering scale on the PAI.</b></p> <p>21 Q Let me ask you about another document.</p> <p>22 MR. DENNISON: The document is PX 1248.</p>	<p>4136</p> <p>1 violent because you were so upset?</p> <p>2 <b>A Correct.</b></p> <p>3 Q Do you see that language?</p> <p>4 You knew Ms. Heard to do violent things</p> <p>5 when she's upset?</p> <p>6 <b>A This test specifies how often have you</b></p> <p>7 <b>had these symptoms in the last six months?</b></p> <p>8 Q Just in the last six months?</p> <p>9 <b>A Correct.</b></p> <p>10 Q So she hadn't had them in the last</p> <p>11 six months?</p> <p>12 <b>A Correct.</b></p> <p>13 Q This test also asks and inquires about</p> <p>14 intentionally hurting yourself or cutting.</p> <p>15 <b>A In the last six months.</b></p> <p>16 Q Right.</p> <p>17 <b>A Is the prompt.</b></p> <p>18 Q In the last six months?</p> <p>19 <b>A Correct.</b></p> <p>20 Q Had Ms. Heard previously indicated to</p> <p>21 you that she cut herself?</p> <p>22 <b>A She indicated one time, as a teenager,</b></p>
<p>4135</p> <p>1 THE COURT: 1248.</p> <p>2 MR. DENNISON: 1248. Your Honor, may I</p> <p>3 approach?</p> <p>4 THE COURT: Okay. Yes, sir.</p> <p>5 MR. DENNISON: All right.</p> <p>6 THE COURT: Thank you.</p> <p>7 MR. DENNISON: Can you put up PX 1248,</p> <p>8 just for the witness.</p> <p>9 Q Dr. Hughes, do you recognize this?</p> <p>10 <b>A Yes.</b></p> <p>11 Q All right. And these are critical</p> <p>12 items that were deduced on the TSI-2 critical</p> <p>13 items list?</p> <p>14 <b>A Correct.</b></p> <p>15 Q And what's a zero mean?</p> <p>16 <b>A Means that she scored a zero on that</b></p> <p>17 <b>item. She said it's not something that's relevant</b></p> <p>18 <b>for her at the time frame that the test was</b></p> <p>19 <b>administered.</b></p> <p>20 Q And these are all self-reports, right?</p> <p>21 <b>A Correct.</b></p> <p>22 Q So she scored a zero on doing something</p>	<p>4137</p> <p>1 <b>in a reckless moment, she did. "It was stupid and</b></p> <p>2 <b>I never did it again."</b></p> <p>3 Q All right. So that was the first time</p> <p>4 you met her, she indicated that she had cut</p> <p>5 herself. What did you do to satisfy yourself that</p> <p>6 she didn't continue to engage in that behavior?</p> <p>7 <b>A As with most things, I asked about the</b></p> <p>8 <b>frequency of the behavior and had it ever occurred</b></p> <p>9 <b>again. Had she ever engaged in suicidal behavior</b></p> <p>10 <b>or suicidal gestures. That's part of that screen.</b></p> <p>11 Q Where did Ms. Heard cut herself?</p> <p>12 <b>A I'd have to look at my notes to be</b></p> <p>13 <b>sure.</b></p> <p>14 Q All right. Why don't we do that?</p> <p>15 That's in your intake note, correct?</p> <p>16 <b>A I don't recall.</b></p> <p>17 MR. DENNISON: Why don't we go to</p> <p>18 PX 938. And if you'd put it up for the witness.</p> <p>19 That's not it. Let's go to the next page. There</p> <p>20 we go. All right.</p> <p>21 Q PX 938, we're on the third page. This</p> <p>22 background information sheet has already been</p>

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28 (4138 to  
4141)

4138	4140
<p>1 admitted into evidence. And there's a discussion 2 here, we talked about earlier, about intimate 3 relationships? 4 <b>A I'm sorry. Your question?</b> 5 Q Yeah. 6 MR. DENNISON: Let's go back to the 7 first page. All right. There we go. 8 This is in at 1246, this page, anyway. 9 I'll ask that it be published to the jury. 10 MS. BREDEHOFT: I think it already was, 11 Your Honor, but we can do it again. 12 MR. DENNISON: We're going to do it 13 again. 14 THE COURT: You said 1246? 15 MR. DENNISON: 1246. 16 THE COURT: It's in evidence. There's 17 supposed to be redactions, though. 18 MS. BREDEHOFT: That's in. 19 THE COURT: All right. That's in. 20 1246. 21 MR. DENNISON: So why don't we blow up 22 the intimate relationships section.</p>	<p>1 THE COURT: Yes, sir. 2 MR. DENNISON: I got there. 1246. 3 THE COURT: 1246, yes. 4 MR. DENNISON: Which opposing counsel 5 insisted come in as a full exhibit. 6 THE COURT: All right. 7 MR. DENNISON: When we get to the last 8 page, there's a legal history that addresses her 9 arrest for domestic violence. 10 THE COURT: Okay. 11 MS. BREDEHOFT: Your Honor, I would 12 want this redacted, Your Honor. I wasn't aware, 13 but I didn't have the exhibit. 14 THE COURT: Okay. 15 MR. DENNISON: I would like to ask -- 16 MS. BREDEHOFT: It also has the dog -- 17 the dogs, it has all of that on that page. I 18 would want that redacted. 19 MR. DENNISON: These are the notes that 20 this witness took with respect to her initial 21 intake relative to domestic violence, and Tasya, 22 Tasya, is an intimate partner who is identified in</p>
4139	4141
<p>1 Q There's intimate relationships here 2 relevant to various people, including a person 3 called Tasya? 4 <b>A Tasya.</b> 5 Q Who is she? 6 <b>A She was Ms. Heard's wife.</b> 7 Q Okay. And that relationship preceded 8 her relationship with Mr. Depp? 9 <b>A That's correct.</b> 10 Q Did you say, on direct, that you saw no 11 previous inter-partner violence? Just yes or no. 12 <b>A I don't believe I did.</b> 13 Q You don't believe that you saw 14 inter-partner violence or you didn't say it on 15 direct? 16 <b>A I don't believe I said that yesterday.</b> 17 Q Okay. 18 MR. DENNISON: Your Honor, can we 19 approach? 20 THE COURT: Yes, sir. 21 MR. DENNISON: Thanks. 22 (Sidebar.)</p>	<p>1 the intake form. 2 MS. BREDEHOFT: Your Honor can see. 3 This is legal history. 4 THE COURT: I'm sorry. Wait, where am 5 I looking? 6 MS. BREDEHOFT: Legal history. It 7 doesn't say intimate partner violence. It also 8 says -- 9 MR. DENNISON: The arrest is for 10 domestic violence. 11 MS. BREDEHOFT: The arrest, that should 12 stay out, and that should be redacted, Your Honor. 13 THE COURT: So, what are you asking me? 14 Are you asking me if you can ask her about it 15 because it was in her notes? 16 MR. DENNISON: I'm asking to her ask 17 about -- because Ms. Heard identified this as part 18 of her legal history and this incident included an 19 arrest for domestic violence relative to an 20 intimate partner. 21 THE COURT: Right. But she didn't 22 testify to it.</p>

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29 (4142 to  
4145)

<p>4142</p> <p>1 MS. BREDEHOFT: No.</p> <p>2 THE COURT: I have the Motion in Limine</p> <p>3 in place, so I'm just not going to allow it at</p> <p>4 this time.</p> <p>5 MS. BREDEHOFT: I ask that this page be</p> <p>6 redacted. I asked before that we go through for</p> <p>7 redaction. This is one I'm asking for redactions.</p> <p>8 MR. DENNISON: So the Motion in Limine</p> <p>9 allowed me to ask that single question --</p> <p>10 THE COURT: No. I believe that the</p> <p>11 door ain't opened. If she testified to that, you</p> <p>12 definitely would have been able to get into, but</p> <p>13 the Motion in Limine, you wouldn't be able to get</p> <p>14 into it unless the door was opened. But I just</p> <p>15 want you to know, if the door opens, the door</p> <p>16 opens.</p> <p>17 But I think that last page has to be</p> <p>18 redacted. I'm waiting for redactions anyway. You</p> <p>19 have a chance to look at it.</p> <p>20 MS. BREDEHOFT: Okay.</p> <p>21 THE COURT: All right?</p> <p>22 MR. DENNISON: Thank you.</p>	<p>4144</p> <p>1 of violence perpetrated on him, as well as</p> <p>2 psychological aggressive acts perpetrated upon</p> <p>3 him.</p> <p>4 MR. DENNISON: No further questions.</p> <p>5 THE COURT: All right. Redirect.</p> <p>6 EXAMINATION BY COUNSEL FOR THE DEFENDANT AND</p> <p>7 COUNTERCLAIM PLAINTIFF</p> <p>8 BY MS. BREDEHOFT:</p> <p>9 Q Dr. Hughes, you were asked about some</p> <p>10 presentations. I think Plaintiff's 1241 was the</p> <p>11 first one.</p> <p>12 MS. BREDEHOFT: If we can bring that</p> <p>13 up. Tom, would you help me out with that? 1241.</p> <p>14 A Yes.</p> <p>15 MS. BREDEHOFT: And if you can scroll</p> <p>16 down.</p> <p>17 Q What was the significance of this</p> <p>18 presentation?</p> <p>19 MS. BREDEHOFT: And can you give her</p> <p>20 control, or do you have to have control of the</p> <p>21 document?</p> <p>22 AV TECHNICIAN: It's one page.</p>
<p>4143</p> <p>1 THE COURT: All right.</p> <p>2 (Open court.)</p> <p>3 BY MR. DENNISON:</p> <p>4 Q Did you speak to Ms. Heard around the</p> <p>5 circumstances that gave rise to the TRO?</p> <p>6 A On May 21st?</p> <p>7 Q Yes. Thank you.</p> <p>8 A Yes, I did.</p> <p>9 Q Okay. Did Ms. Heard ever tell you that</p> <p>10 James Franco spent the night with her at the ECB</p> <p>11 between May 21 and May 27?</p> <p>12 A I recall -- I mean, again, it would be</p> <p>13 helpful to have my notes so I can tell you exactly</p> <p>14 what, but I do recall that she did see him, at</p> <p>15 some point. I do not know if he spent the night.</p> <p>16 Q Do you know if Elon Musk spent the</p> <p>17 night during that period?</p> <p>18 A I don't know.</p> <p>19 Q All right.</p> <p>20 You cannot testify that Johnny Depp was</p> <p>21 not abused, can you?</p> <p>22 A I can testify that he had physical acts</p>	<p>4145</p> <p>1 MS. BREDEHOFT: It's just one page?</p> <p>2 Oh, it's not the entire presentation? Okay.</p> <p>3 Q Can you, please, tell the jury what you</p> <p>4 provided in this presentation?</p> <p>5 A To the best of my recollection, it was</p> <p>6 what I spoke to you about before, of how people</p> <p>7 who are not trained in forensic psychology, but</p> <p>8 who are working with victims of domestic violence,</p> <p>9 can go into court and navigate with the court</p> <p>10 system and present and talk about domestic</p> <p>11 violence in a legal setting.</p> <p>12 Q Okay. Thank you. And that's been</p> <p>13 moved into --</p> <p>14 MS. BREDEHOFT: That's been moved in,</p> <p>15 correct?</p> <p>16 THE COURT: Yes.</p> <p>17 MS. BREDEHOFT: Let's go to the one I</p> <p>18 don't think was. 1242, please.</p> <p>19 Tom, if you could bring that up. All</p> <p>20 right. And is that just one page, too? How many</p> <p>21 pages is that one?</p> <p>22 AV TECHNICIAN: Multiple pages.</p>

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30 (4146 to  
4149)

<p>4146</p> <p>1 Q Do you recall this presentation, 2 Dr. Hughes? 3 <b>A Yes, I do.</b> 4 Q Okay. Could you please -- 5 MS. BREDEHOFT: Well, I'm going to move 6 the admission of Plaintiff's Exhibit 1242, first 7 of all. 8 THE COURT: Any objection? 9 MR. DENNISON: No. 10 THE COURT: All right. 1242. 11 MS. BREDEHOFT: Can we publish it to 12 the jury, please? 13 THE COURT: Yes, ma'am. 14 Q And, Dr. Hughes, could you, please, 15 tell the jury -- explain to the jury what this 16 presentation entails? 17 <b>A So I was asked, by the head of the</b> 18 <b>Kings County Bar Association, to give a</b> 19 <b>presentation about intimate partner violence,</b> 20 <b>domestic violence, and how psychological experts</b> 21 <b>can be of assistance.</b> 22 <b>This was, just because of how Brooklyn</b></p>	<p>4148</p> <p>1 MS. BREDEHOFT: No, no, no, no. 2 We need -- thank you, Sammy. But you 3 were doing a fine job, Tom. I didn't mean to take 4 it away from you. Thank you, Michelle. 5 Q Dr. Hughes, is this your CV? 6 <b>A Yes, it is.</b> 7 MS. BREDEHOFT: I'm going to move the 8 admission of Defendant's 1434. 9 MR. DENNISON: Objection, Your Honor. 10 Hearsay. 11 MS. BREDEHOFT: Your Honor, 12 completeness. They've got all the other records 13 in here for Dr. Hughes. I'm trying to seek 14 completeness. 15 THE COURT: I understand. I'll sustain 16 the objection. 17 Next question. 18 MS. BREDEHOFT: Okay. Let's go to 19 Defendant's 1435, please. 20 Q Now, Dr. Hughes, you've testified about 21 the different testings that you administered, and 22 this is one of the ones that, I believe, you</p>
<p>4147</p> <p>1 is, a bar association that was attended by many of 2 the prosecutors from the Kings County District 3 Attorneys Office as well as defense attorneys. 4 And as I stated before, this presentation was 5 about how to really understand cases of domestic 6 violence. How to understand, what if she drops 7 the restraining order? What if she doesn't call 8 the police? What are the myths and misconceptions 9 about intimate partner violence? And when she 10 uses force, what does that mean? How do we 11 understand that? How do we evaluate for that? 12 <b>Again, without seeing the rest of the</b> 13 <b>presentation, I believe that was the thrust of</b> 14 <b>this presentation.</b> 15 Q Okay. Great. Thank you. 16 Now, you testified about the notes you 17 took and the notes you reviewed, and you were 18 asked about some limited questions on testing. 19 MS. BREDEHOFT: I'm going to ask for 20 Defendant's Exhibit 1434. 21 MR. DENNISON: Are you going to do that 22 one?</p>	<p>4149</p> <p>1 testified to earlier, correct? 2 <b>A That's correct.</b> 3 Q And this is the DSM-5? 4 <b>A This is the Clinician-Administered PTSD</b> 5 <b>Scale for the DSM-5.</b> 6 Q Okay. 7 MS. BREDEHOFT: I'm going to move the 8 admission of 1435. 9 THE COURT: Any objection? 10 MR. DENNISON: We object, Your Honor, 11 because it has a lot of other documents in it, not 12 just the CAPS-5. 13 MS. BREDEHOFT: It's not the CAPS-5. 14 It's the DSM-5. 15 MR. DENNISON: Yes. 16 MS. BREDEHOFT: But she administered 17 all these tests, Your Honor, and for completeness 18 of record, they can't put in partials and then not 19 have the rest of it. 20 THE COURT: Well, I mean -- 21 MS. BREDEHOFT: I have the rule on 22 this, Your Honor.</p>

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31 (4150 to  
4153)

<p>4150</p> <p>1 THE COURT: -- there was no objection 2 to when they put theirs in, and now they're 3 objecting to you putting. 4 MS. BREDEHOFT: I would cite rule of 5 completeness, Your Honor, Virginia Rule 2:106, 6 that they can't just put a partial in and then not 7 have the completeness of the testing in the 8 documents. 9 THE COURT: Well, they put their test 10 in, now you want to put more tests in, correct? 11 MS. BREDEHOFT: Correct. 12 THE COURT: That's not a completeness 13 argument, then. That's just a different test. 14 MS. BREDEHOFT: Well, it's -- 15 THE COURT: But what's the objection, 16 though. 17 MR. DENNISON: Hearsay, Your Honor. 18 THE COURT: All right. I'll sustain 19 the objection. 20 Next question. 21 MS. BREDEHOFT: All right. Well, then, 22 we'll go for the other ones.</p>	<p>4152</p> <p>1 A So, not only on this. I mean, this 2 instrument can stand alone, where she meets PTSD 3 criteria, just by virtue of this instrument. 4 Pardon me. But, also, the other testing that I 5 gave, where she had elevated scales on PTSD 6 measures, which correspond with the DSM-5 symptoms 7 of PTSD. So there were multiple measures that are 8 consistent across time that she meets criteria for 9 PTSD. 10 Q Thank you, Dr. Hughes. 11 Now, you were also given one page of 12 the scoring on the TSI-2 and one page with respect 13 to the PAI. 14 Do you recall seeing that? 15 A It wasn't the scoring. They were the 16 critical items on those respective tests. 17 Q Okay. 18 MS. BREDEHOFT: Well, I'm going to ask 19 to bring up Defendant's Exhibit 1858, which is the 20 full PAI. 21 Q And was this the actual testing and 22 scoring?</p>
<p>4151</p> <p>1 You did the TSI -- 2 Q Before we go on to the others, let's 3 talk about. 4 Can you, please, tell the jury what you 5 administered in this DSM-5 and why this is 6 significant? 7 MR. DENNISON: Objection. Compound. 8 THE COURT: Sustained. 9 Q Can you tell us why the DSM-5 is 10 significant, that you administered? 11 A So, the DSM-5 is the diagnostic and 12 statistical manual for psychiatric disorders. 13 It's published by the American Psychiatric 14 Association. That's where it has all the criteria 15 and all the information for all major mental 16 disorders, like major depressive disorder or panic 17 disorder or PTSD. What the CAPS is, the 18 Clinician-Administered PTSD Scale, is it follows 19 all of that criteria that's in the DSM-5 so that 20 you can make a very accurate diagnosis. 21 Q And what, if any, diagnosis did you 22 make as a result of this DSM-5?</p>	<p>4153</p> <p>1 A Yes. This is the profile, the scores 2 that are generated from the 344 questions that 3 Ms. Heard answered on this test. 4 Q And what did you -- what were the 5 results? What did you determine based on the 6 testing of this PAI? 7 A Well, that the results were valid and 8 reportable. There was no evidence of exaggeration 9 or malingering on this test, and there were 10 significant symptoms that correspond with 11 traumatic stress and post-traumatic stress 12 disorder symptomatology. 13 Q And I believe you've said, again, that 14 there was -- that there was no elevated scores. 15 Can you explain to the jury what you 16 meant by that? 17 MR. DENNISON: Objection. Leading. 18 THE COURT: Overrule that. 19 Go ahead. 20 A So, elevated scores are a way that we 21 get to know where a cutoff is to say that 22 something is clinically significant. And that</p>



<p>4154</p> <p>1 follows very standard statistical principles. So 2 when a scale is elevated, it means that we have 3 sort of greater confidence that this individual 4 endorsed a lot of different symptoms that make 5 this scale relevant, and we want to figure out why 6 that person is having an elevated score on 7 something like depression or anxiety. It gives us 8 greater confidence that, you know, this person may 9 be reporting depressive symptoms like people who 10 are depressed. 11 Q And what would constitute an elevated 12 score? 13 A Well, on different tests, it's 14 different things. Certainly on the PAI, it 15 doesn't follow the newer T scores. It's a little 16 different statistically. So you have to look at 17 it differently. But, certainly, you know, it's 18 usually about a T score of a 65, and on some, it's 19 a T score of 70. Which is -- a T score is 20 normative curve. It's a way of allowing us to 21 compare people's scores, comparing your scores to 22 the normative group of scores.</p>	<p>4156</p> <p>1 A The Trauma Symptom Inventory is a test 2 of common symptoms of post-traumatic stress 3 disorder and related traumatic symptomatology. 4 And on this score, she had, you know, elevations 5 in intrusive experiences, which is the intrusive 6 components of PTSD, where thoughts or memories or 7 feelings come into your mind when you don't want 8 them, with accompanying distress. And then the 9 defensive avoidance, doing many, many different 10 things to push it down, to try not to think about 11 it, to try not to talk about it so that you don't 12 get upset. 13 And she also scored high on a scale of 14 relational avoidance, having difficulty feeling 15 close in relations -- relationships, not only 16 intimate relationships, but friendships as well. 17 And that's a related trauma symptom that 18 individuals have after having sustained an 19 interpersonal trauma like domestic violence. 20 Q Okay. And would it be helpful to have 21 the full exam as opposed to one page out of it? 22 A As with anything, seeing an entire</p>
<p>4155</p> <p>1 Q Would it be helpful to have the entire 2 test as opposed to a -- one piece of paper or one 3 page? 4 A Well, certainly, you cannot tell the 5 entirety of how the symptoms that Ms. Heard 6 endorsed on the scales were elevated just by the 7 critical items. 8 MS. BREDEHOFT: I'm going to move the 9 admission of Plaintiff's -- of Defendant's 10 Exhibit 1858. 11 MR. DENNISON: Objection. Hearsay. 12 MS. BREDEHOFT: And this is the 13 completeness, Your Honor. 14 THE COURT: I'll sustain the objection. 15 Next question. 16 MS. BREDEHOFT: Let's bring up 1859. 17 Q And this is -- you were shown one page 18 from the TSI-2, the Trauma Symptom Inventory-2. 19 Do you recall that? 20 A Correct. 21 Q What is the significance of the TSI-2 22 exam, the full exam?</p>	<p>4157</p> <p>1 profile gives one more information. 2 MS. BREDEHOFT: Your Honor, I move the 3 admission of Defendant's Exhibited 15 -- 1859. 4 MR. DENNISON: Objection. Hearsay. 5 THE COURT: All right. 6 MS. BREDEHOFT: I would argue the 7 completeness for that. 8 THE COURT: You can approach for this. 9 (Sidebar.) 10 THE COURT: I just want to make sure. 11 They just did the first page. Is that the actual 12 test or is that just -- 13 MS. BREDEHOFT: It's the entire test. 14 THE COURT: You want the entire test, I 15 understand that. But the first page was just a 16 summary of it? 17 MS. BREDEHOFT: No. The two pages that 18 he put in were a page from it, and it wasn't even 19 the beginning or a summary. It was a particular 20 snapshot. It was one page from there in a 21 particular area. 22 MR. DENNISON: I asked the witness</p>

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33 (4158 to  
4161)

<p>4158</p> <p>1 about the critical items identified on the test. 2 I didn't go into anything other than the critical 3 items on the test. That's why I put those pages 4 in. 5 THE COURT: Okay. 6 MS. BREDEHOFT: It's just one page of a 7 particular critical for that particular topic. 8 There's all kinds of different pages and critical 9 items in there. 10 THE COURT: All right. I understand 11 the objection by him. I'm going to sustain the 12 objection. 13 Thank you, though. I just wanted to 14 make sure. 15 MS. BREDEHOFT: Okay. Thank you. 16 (Open court.) 17 BY MS. BREDEHOFT: 18 Q Now, Dr. Hughes, you were asked -- you 19 were shown a couple of finger pictures of 20 Mr. Depp. And I believe you indicated -- those 21 were shown to you, and I think you were asked if 22 you were -- if these were severe injuries,</p>	<p>4160</p> <p>1 MS. BREDEHOFT: The part I'm trying to 2 admit is in another exhibit, so let's go in a 3 different way. We'll take that one down. 4 Let's go with 398. 5 THE COURT: 398 redacted is in 6 evidence. 7 MS. BREDEHOFT: That might be the one. 8 All right. If you could blow that up. 9 And I think we're looking for -- if you could, 10 move that up, Michelle. There we go. If you 11 could blow that one up. 12 Q And this is an email from Mr. Depp to 13 David Kipper, his -- your understanding was that 14 was his doctor, correct? 15 <b>A Correct.</b> 16 Q Okay. And then I'm going to draw your 17 attention to the last part of this, and this was 18 on 3/19/2015, "thank you for everything" -- figure 19 out how to do this. I'm missing the controls on 20 this. "Thank you for everything. I've chopped 21 off my left middle finger as a reminder that I 22 should" -- thank you, Your Honor -- "that I should</p>
<p>4159</p> <p>1 correct? 2 <b>A Correct.</b> 3 Q All right. Did you have any 4 understanding of the cause of those injuries by 5 Mr. Depp? 6 <b>A I do understand that there's competing</b> 7 <b>accounts of what happened, for sure.</b> 8 Q All right. 9 MS. BREDEHOFT: Let's bring up 10 Defendant's Exhibit 373. 11 Your Honor, I think this is already 12 admitted. 13 THE COURT: I don't see it and Jamie 14 doesn't have it. So, 373, I can mark it, but it's 15 not admitted yet. 16 MS. BREDEHOFT: I think there's a 17 version of that. 18 THE COURT: Well, I don't know that. I 19 can just tell you that 373 has not been admitted 20 into evidence. 21 MR. DENNISON: Your Honor, it's not 22 redacted, and I don't believe it's been admitted.</p>	<p>4161</p> <p>1 never cut off my finger again." 2 Do you see that? 3 <b>A Yes, I do.</b> 4 Q So that's Mr. Depp admitting that to 5 Dr. Kipper in 3/19/2015? 6 MR. DENNISON: Objection. Leading. 7 MS. BREDEHOFT: Okay. 8 THE COURT: I'll sustain the objection. 9 MS. BREDEHOFT: That's fine. I'm good 10 with that. 11 Let's go to Defendant's Exhibit 499. 12 And, Your Honor, I believe this one is 13 in as well. Or is it the redacted? 14 THE COURT: It's the redacted one. 15 Yes, that's the one. 16 MS. BREDEHOFT: Okay. Thank you. 17 Q And then, if I could draw your 18 attention, this is a text message from Mr. Depp to 19 Erin Falati, we talked about her earlier, on 20 10/31/2015. And it says "This is the second time 21 he's held off giving me my meds by blackmailing me 22 into seeing him. The first time I had just</p>

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34 (4162 to  
4165)

<p style="text-align: right;">4162</p> <p>1 chopped my finger off." 2 Do you recall seeing that as part of 3 the documents that you reviewed? 4 <b>A I believe I did.</b> 5 Q Okay. Thank you. 6 MS. BREDEHOFT: We can take that down. 7 Q Now, you were also asked to listen to 8 an audiotape, and it's Plaintiff's 343. I'm going 9 to -- and do you recall listening to that audio 10 tape, at some point, as part of your review? 11 <b>A Yes, I do.</b> 12 Q Okay. I'm going to, now, pull up that 13 same audiotape from the same day, and I believe 14 that's June 2016. 15 MS. BREDEHOFT: And if we could go 16 to -- we're going to have a few different ones, so 17 hold in there with us. We're going to start with 18 2 minutes, 40 seconds, 00, going to 2 minutes, 19 40 seconds and 21. 20 (Whereupon, the following audio 21 recording was played.) 22 MS. HEARD: Come knocking on the door.</p>	<p style="text-align: right;">4164</p> <p>1 Q Well, the tape recording that you 2 listened to was at 2:46:01 to 2:47:20, and that 3 was 2:40 through 2:40:21, correct? 4 <b>A I understand.</b> 5 MR. DENNISON: Objection. Leading. 6 Q Okay. 7 THE COURT: Overruled. 8 Go ahead. 9 MS. BREDEHOFT: Thank you. 10 Q Now, let's go to after that, 2:52:00 to 11 2:52:34. 12 (Whereupon, the following audio 13 recording was played.) 14 MS. HEARD: Stress yesterday because of 15 how it's been lately, like, since Australia. And 16 I have been on the road with you. I haven't been 17 working. I don't know what else I can fucking do. 18 MR. DEPP: Since Australia? We were on 19 our honeymoon. We had a great time other than the 20 fight. We had a fight on the train. 21 MS. HEARD: Yeah. 22 MR. DEPP: Which was physical.</p>
<p style="text-align: right;">4163</p> <p>1 I don't get why I want -- 2 MR. DEPP: Because that is a fucking 3 irrational -- 4 MS. HEARD: I don't get why one informs 5 the other. 6 MR. DEPP: -- and violent fucking 7 maneuver. 8 MS. HEARD: How does one inform the 9 other? 10 MR. DEPP: So a man would want to get 11 out of that area so that he doesn't get so fucking 12 angry that he actually does pop the fucking wife. 13 MS. HEARD: How does one inform the 14 other? 15 MR. DEPP: Oh, man. Go home and listen 16 to the tape. 17 (Whereupon, the audio recording ended.) 18 BY MS. BREDEHOFT: 19 Q Now, that was just before the 20 punching/hitting that was played. 21 Do you recall that? 22 MR. DENNISON: Objection. Leading.</p>	<p style="text-align: right;">4165</p> <p>1 MS. HEARD: Yeah. 2 MR. DEPP: And then we had a fight in 3 San Francisco. And I thought everything else was 4 great. And you're saying I'm doing this since 5 Australia? 6 MS. HEARD: No. 7 (Whereupon, the audio recording ended.) 8 MS. BREDEHOFT: And then, let's go to 9 3:20:00 to 3:21:37. 10 Q And while they're getting that, I'll 11 just ask you the question, Dr. Hughes. 12 Do you recall that Mr. Depp said that 13 they had fights in the places that he listed on 14 that audiotape? 15 MR. DENNISON: Objection. Leading. 16 THE COURT: Sustained. 17 MS. BREDEHOFT: All right. 18 Q What do you recall Mr. Depp saying 19 about fights that they'd had, on that audiotape? 20 MR. DENNISON: Objection. No 21 foundation. 22 MS. BREDEHOFT: She just listened to</p>

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35 (4166 to  
4169)

<p>4166</p> <p>1 it.</p> <p>2 THE COURT: Overruled.</p> <p>3 <b>A I think it was hard to hear in this</b></p> <p>4 <b>one. I had listened to it previously, just</b></p> <p>5 <b>acknowledging that there were fights previously.</b></p> <p>6 Q Okay. Thank you.</p> <p>7 (Whereupon, the following audio</p> <p>8 recording was played.)</p> <p>9 MR. DEPP: I left last night, honestly,</p> <p>10 I swear to you, because I just couldn't take the</p> <p>11 idea of more physicality, more physical abuse on</p> <p>12 each other. Because had we continued, it would</p> <p>13 have --</p> <p>14 MS. HEARD: I know.</p> <p>15 MR. DEPP: -- gotten fucking, you know,</p> <p>16 bad. Baby, I told you this once, I'm scared to</p> <p>17 death of this. We are a fucking crime scene</p> <p>18 waiting to happen --</p> <p>19 MS. HEARD: I know.</p> <p>20 MR. DEPP: -- if we don't get our shit</p> <p>21 together. And I -- by getting our shit together,</p> <p>22 that might mean fucking, aye, we do this, we make</p>	<p>4168</p> <p>1 Q Okay.</p> <p>2 MS. BREDEHOFT: Is it possible to turn</p> <p>3 that up any more? I have one more. Just...</p> <p>4 Thank you, Jamie.</p> <p>5 Q Okay. My last one is 3:26:20 to</p> <p>6 3:29:50.</p> <p>7 MR. DENNISON: Your Honor, can we</p> <p>8 approach?</p> <p>9 THE COURT: Okay. Yes, sir.</p> <p>10 (Sidebar.)</p> <p>11 MR. DENNISON: All of this is beyond</p> <p>12 the scope of cross.</p> <p>13 THE COURT: Well, I mean, you put the</p> <p>14 audiotope in.</p> <p>15 MR. DENNISON: Every audiotope comes in</p> <p>16 because I asked about one thing?</p> <p>17 MS. BREDEHOFT: It's the same</p> <p>18 audiotope.</p> <p>19 THE COURT: It's the same audiotope.</p> <p>20 This is the last, correct?</p> <p>21 MS. BREDEHOFT: Yes.</p> <p>22 MR. DENNISON: Thanks.</p>
<p>4167</p> <p>1 it. That might mean, damn, you know, say, I've</p> <p>2 tried. Done. Toodeloo. But we've got to get our</p> <p>3 shit together as individuals and as a couple</p> <p>4 because I love you and I do not want to leave you?</p> <p>5 I do not want a divorce. I do not want you out of</p> <p>6 my life. I just want peace.</p> <p>7 And if I'm the culprit majority of the</p> <p>8 time, I will fucking do everything I can. And I</p> <p>9 will recognize when I'm fucking starting to go</p> <p>10 sideways. Will recognize it.</p> <p>11 (Whereupon, the audio recording ended.)</p> <p>12 BY MS. BREDEHOFT:</p> <p>13 Q Do you recall listening to that part of</p> <p>14 the tape, the audiotope?</p> <p>15 <b>A Yes, I do.</b></p> <p>16 Q And what do you recall from that</p> <p>17 portion? Again, I know it's hard to hear.</p> <p>18 <b>A It's hard to hear, but what I recall,</b></p> <p>19 <b>from hearing that, was the negotiation that the</b></p> <p>20 <b>couple is trying to do and trying to say, you</b></p> <p>21 <b>know, I'm going to do my part. I'm going to do</b></p> <p>22 <b>better.</b></p>	<p>4169</p> <p>1 (Open court.)</p> <p>2 MS. BREDEHOFT: When you're ready.</p> <p>3 (Whereupon, the following audio</p> <p>4 recording was played.)</p> <p>5 MR. DEPP: I need more understanding,</p> <p>6 from both of us.</p> <p>7 MS. HEARD: It's -- that sounds very</p> <p>8 good and I agree. But what about the -- what are</p> <p>9 we --</p> <p>10 MR. DEPP: In the moment.</p> <p>11 MS. HEARD: What are we going to do</p> <p>12 different in the moment, when you're mad and you</p> <p>13 go, "Fuck it" --</p> <p>14 MR. DEPP: In the moment.</p> <p>15 MS. HEARD: -- and you decide all bets</p> <p>16 are off?</p> <p>17 MR. DEPP: In the moment.</p> <p>18 Well, look what I did in Australia.</p> <p>19 Look what I accomplished. I put the fucker away.</p> <p>20 I told myself every fucking day, "No, he's gone.</p> <p>21 No, he's gone because I fucking put him away. Put</p> <p>22 him away."</p>

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36 (4170 to  
4173)

<p>4170</p> <p>1 And by a list of the things that I feel 2 that fuck you over or make you feel shitty, or 3 anything like that, I'm fucking, when we're in the 4 moment, I remember it. I remember what I put on 5 my list. I remember it and I try to, to, to bring 6 it down notches, many notches. I've tried, when 7 we're heightened, to say, please, I don't want you 8 to feel this. I don't want -- I don't want to 9 feel this. Let's -- 10 MS. HEARD: I'm not. I need to know 11 what we need to do different. I need to know. 12 MR. DEPP: It's got to be done with 13 your mind and your heart. 14 MS. HEARD: What do we do different if 15 I have a problem? 16 MR. DEPP: Tell me. 17 MS. HEARD: You need to tell me how to 18 tell you different if I'm hurting you. You need 19 to let me be able to be mad. Sometimes you're 20 going to make me mad. I'm a human. I cannot live 21 where it's like -- 22 MR. DEPP: Well, then, the same thing</p>	<p>4172</p> <p>1 there in our fucking heads and in our hearts. 2 Let's go back there and know on your list -- 3 MS. HEARD: Is the monster gone? Did 4 you put him away? It's been so --when you get on 5 that train, you're angry, you stay on it for so 6 long and you won't come down. You won't talk to 7 the person that is you -- 8 MR. DEPP: That's not -- that's not 9 always. That's not always. 10 MS. HEARD: Doesn't have to always be 11 the monster. But what is it? Can you put that 12 away? Can you remember the bigger picture? You 13 don't want to spend your life -- I've asked you 14 this so many times in fights, do you want to spend 15 your time in this? I know you don't. But I ask 16 you because this is something you're choosing. 17 I'm saying to you "olive branch." And you don't 18 take my olive branches. You make me feel 19 humiliated for offering them. You asked me to 20 stay in Australia. I stayed. And then you walk 21 out on me all the time. 22 You've got to take some olive branches</p>
<p>4171</p> <p>1 goes for me, then. You're going to have to allow 2 me to get mad then. 3 MS. HEARD: Yes. Exactly. If I do 4 something that makes you mad -- 5 MR. DEPP: Okay. But I get mad and you 6 start fucking yelling. 7 MS. HEARD: I don't have to start 8 yelling. I think I start yelling once it gets 9 fucking heightened. I've gotten a lot better 10 about that. It's just only -- I only start 11 yelling when it's fuckin' hour 11 and we're really 12 in it. 13 MR. DEPP: Yeah, yeah. I get hot, but 14 I've been better about that. I was -- we've had 15 three physical fights in the last month and a 16 half. 17 MS. HEARD: I was talking about the 18 yelling, but... 19 MR. DEPP: No, but I'm saying -- we -- 20 we -- you witnessed it. You're the one that 21 brought it up. Australia was fucking great. We 22 just argued. Let's go back there. Let's go back</p>	<p>4173</p> <p>1 from me. You've got to offer them too. You've 2 got to be bigger than what you feel at that 3 moment, and so do I. So do I. 4 But if I call you on it, will you hear 5 it? 6 MR. DEPP: Yeah. 7 MS. HEARD: You call me out on it if 8 I'm doing it? 9 MR. DEPP: Of course I will. 10 (Whereupon, the audio recording ended.) 11 BY MS. BREDEHOFT: 12 Q Do you remember listening to that, 13 Dr. Hughes? 14 A Yes, I do. 15 Q And what is your interpretation of 16 that? What do you recall? 17 MR. DENNISON: Objection, Your Honor. 18 Speculation. 19 MS. BREDEHOFT: She's an expert. 20 THE COURT: Overruled. 21 A I think this is how the couple was 22 trying to negotiate in the face of all of the</p>

<p style="text-align: right;">4174</p> <p>1   turmoil and violence and the abuse. I think it's 2   important pointing out, my recollection is there's 3   two Australias. So they're talking about the 4   honeymoon Australia, not the Australia where the 5   incident happens. They go back and that becomes a 6   honeymoon time for them. And I think, certainly, 7   hearing how this couple has talked about the 8   monster and the person who comes out, we talked 9   about that cycle of violence, where the person 10   who, you know, hurts her and hits her and controls 11   her isn't the same person that she loves and she 12   cares about and that she wants to be with. 13   Q   Thank you, Dr. Hughes. 14       Now, you also were asked about 15   Dr. Bonnie Jacobs and her treatment and her 16   treatment notes. 17       Did you review the notes of Bonnie 18   Jacobs? 19   A   Yes, I did. 20   Q   I'm going to ask you -- 21       MS. BREDEHOFT: Can we bring up 22   Defendant's 1059.</p>	<p style="text-align: right;">4176</p> <p>1       MR. DENNISON: Objection. Compound. 2       THE COURT: Overruled. 3       A   These were the notes that I was 4   referring to yesterday. 5       Q   And what was the significance of these 6   notes to you? You were asked, again, about them 7   on cross. 8       A   Again, I found the treatment notes very 9   significant because they had contemporaneous 10   reports of what Ms. Heard was going through. Not 11   only what she was reporting in her relationship 12   with Mr. Depp, but her accompanying 13   symptomatology. What the notes revealed was 14   there's a significant amount -- what we see is 15   unfolding time. We see where the violence starts 16   and we see how it unfolds. We see at least three 17   indications of sexual assaults. We see constant 18   pleadings and upset about his substance abuse and 19   trying to find ways to get him help. And she 20   joins Al-Anon to get herself help as a family 21   member of someone who struggles with substance 22   abuse. We see how she is reporting a lot of</p>
<p style="text-align: right;">4175</p> <p>1       Q   And do you recognize these -- this 2   document? 3       A   Yes. 4       Q   Okay. And what is it? 5       A   This looks like the first of Dr. Bonnie 6   Jacobs' treatment notes, starting in October 17th, 7   2011. 8       Q   Okay. And do you recall whether 9   Ms. Heard was already in a relationship with 10   Mr. Depp at that time? 11   A   Yes, she was. 12   Q   Okay. And you testified, quite 13   extensively, yesterday, about Bonnie Jacobs' notes 14   and entries there. 15       Were those reflected in these notes? 16   A   These were the notes that I -- 17       MR. DENNISON: Objection, Your Honor. 18   Leading. 19       MS. BREDEHOFT: I can ask it 20   differently. 21   Q   What, if any, of those citations that 22   you gave to the jury were in these notes?</p>	<p style="text-align: right;">4177</p> <p>1   controlling behavior and obsessive behavior. We 2   see that there's two instances where the police 3   were going to be called in her apartment in Orange 4   because of the fighting at that time. Once they 5   actually were called and once they weren't, from 6   what I can amass from the notes. 7       So, what it does is it really shows how 8   this relationship is unfolding over time and 9   actually getting worse. 10   Q   And then you indicated that Amber Heard 11   moved from Bonnie Jacobs to Dr. Cowan, and that 12   was in 2014; is that correct? 13   A   Correct. 14   Q   Okay. And what is your understanding 15   of the relationship between Dr. Cowan and 16   Dr. Kipper? 17   A   They were professional colleagues and 18   they were friends, and Dr. Curry -- well, it's 19   understanding why Ms. Heard left the relationship 20   with Bonnie Jacobs. It became a tumultuous 21   relationship for her there because she was doing a 22   lot to protect Johnny and Bonnie Jacobs had</p>

<p>4178</p> <p>1 concerns --</p> <p>2 MR. DENNING: Objection, Your Honor.</p> <p>3 THE COURT: What's the objection?</p> <p>4 MR. DENNISON: No foundation.</p> <p>5 MS. BREDEHOFT: I just established the</p> <p>6 foundation. She reviewed the notes and she</p> <p>7 interviewed Bonnie Jacobs.</p> <p>8 THE COURT: I'll overrule the</p> <p>9 foundation objection.</p> <p>10 Q Go ahead.</p> <p>11 MR. DENNING: Objection.</p> <p>12 Nonresponsive.</p> <p>13 THE COURT: I'll overrule</p> <p>14 nonresponsive.</p> <p>15 Q Please continue, Dr. Hughes.</p> <p>16 A The reason that Ms. Heard left her</p> <p>17 treatment with Bonnie Jacobs was, one, that</p> <p>18 Mr. Depp continued to denigrate that relationship,</p> <p>19 their therapeutic relationship.</p> <p>20 But number two, really, more</p> <p>21 importantly, she wanted to protect Mr. Depp</p> <p>22 because she didn't want -- Dr. Jacobs had some</p>	<p>4180</p> <p>1 Dr. Connell Cowan, correct?</p> <p>2 A Cowan, Connell Cowan, yes.</p> <p>3 Q That's correct.</p> <p>4 And you also interviewed him as well?</p> <p>5 A Correct.</p> <p>6 Q And what was the significance of what</p> <p>7 he reported to you that related to your opinions?</p> <p>8 A Well, this was a continuation of her</p> <p>9 treatment and the treatment here, where it seemed</p> <p>10 like Dr. Connell Cowan was going with a harm</p> <p>11 reduction model, really trying to help Amber stay</p> <p>12 safe in the relationship by not talking back, by</p> <p>13 leaving, by not engaging. And those are very sort</p> <p>14 of short-term strategies when you're in a</p> <p>15 relationship mired with interpersonal violence.</p> <p>16 What we also see is what I mentioned</p> <p>17 yesterday, is her psychological status and</p> <p>18 functioning continues to deteriorate. She</p> <p>19 continues to have more anxiety, more affect</p> <p>20 dysregulation, so the feelings are coming up and</p> <p>21 down all the time. She's having more sleep</p> <p>22 problems, she's going on more medication.</p>
<p>4179</p> <p>1 concerns about, perhaps, his substance using in</p> <p>2 front of his children and that she would be a</p> <p>3 mandated reporter. So, Ms. Heard did not want to</p> <p>4 do anything and talk more about what was going on</p> <p>5 with -- Mr. Depp with her therapist for fear that</p> <p>6 something might happen. So she left that</p> <p>7 treatment, really, to protect Mr. Depp.</p> <p>8 MS. BREDEHOFT: Your Honor, I would</p> <p>9 like to move the admission of Defendant's</p> <p>10 Exhibit 1059, the treatment notes.</p> <p>11 MR. DENNISON: Objection. Hearsay.</p> <p>12 Your Honor, this is what we dealt with yesterday.</p> <p>13 MS. BREDEHOFT: Your Honor, I think</p> <p>14 that for completeness here, she has relied upon</p> <p>15 these and they reflect the present tense</p> <p>16 impressions.</p> <p>17 THE COURT: I'll sustain the objection</p> <p>18 to hearsay.</p> <p>19 MS. BREDEHOFT: All right. Let's go to</p> <p>20 Defendant's Exhibit 1057, please.</p> <p>21 Q And, Dr. Hughes, you also indicated</p> <p>22 that you relied on the treatment notes of</p>	<p>4181</p> <p>1 And the conceptualization and</p> <p>2 understanding of that is sort of exposure to</p> <p>3 repeated trauma causes psychological</p> <p>4 disequilibrium and destabilization. And that sort</p> <p>5 of, again, seeing the trauma unfold over time.</p> <p>6 And also in these notes, I mean,</p> <p>7 certainly, there were other contemporaneous</p> <p>8 reports that correspond to specific incidents.</p> <p>9 Like I was speaking with you yesterday about the</p> <p>10 Boston plane incident, there are actual notes</p> <p>11 where she called him after --</p> <p>12 MR. DENNISON: Objection, Your Honor.</p> <p>13 THE COURT: What's the objection?</p> <p>14 MR. DENNING: Beyond the scope of the</p> <p>15 question.</p> <p>16 THE COURT: Okay. I'll sustain the</p> <p>17 objection.</p> <p>18 Next question.</p> <p>19 MS. BREDEHOFT: Okay.</p> <p>20 Q What, if any, additional information</p> <p>21 did you get from Dr. Cowan that assisted you in</p> <p>22 your opinions?</p>

Transcript of Jury Trial - Day 15  
Conducted on May 4, 2022

39 (4182 to  
4185)

<p style="text-align: right;">4182</p> <p>1 A Well, certainly, from the notes, as I 2 was stating, that, you know, there were times 3 where right after an incident, you know, Ms. Heard 4 wrote -- she contacted Dr. Cowan, either by text 5 or by email, and saying, you know, Johnny did a 6 number on me tonight. I really need to see you. 7 I'm safe. 8 MR. DENNISON: Objection. Hearsay. 9 MS. BREDEHOFT: I think she can rely on 10 hearsay, Your Honor. 11 THE COURT: Sustain the objection to 12 hearsay. 13 MS. BREDEHOFT: Okay. Well, Your 14 Honor, I'm going to move the admission of the 15 notes, Defendant's 1057. 16 MR. DENNISON: Objection. Hearsay, 17 Your Honor. 18 THE COURT: I'll sustain the objection. 19 Thank you. 20 MR. DENNISON: Move to strike the 21 hearsay testimony as well. 22 THE COURT: No, we'll continue on.</p>	<p style="text-align: right;">4184</p> <p>1 the questions asked by counsel for Mr. Depp, you 2 said it depends upon what the context is. 3 What did you mean by that? 4 A Well, first, I believe that this is the 5 knife that has a turquoise end, and this was 6 when -- a time when Mr. Depp was filming the 7 Lone Ranger and he was in a turquoise phase, and 8 she purchased him that because she felt it would 9 be a kind gift. 10 The phraseology is that Mr. Depp told 11 her the only way out of this relationship is 12 death. 13 Q Okay. 14 MR. DENNISON: Objection. Hearsay. 15 MS. BREDEHOFT: I don't understand the 16 objection. I think she was entitled to be able to 17 speak to that. 18 THE COURT: But she -- 19 MS. BREDEHOFT: Yeah, it's Mr. Depp's 20 statement. A party-opponent admission. 21 THE COURT: I'll overrule the 22 objection.</p>
<p style="text-align: right;">4183</p> <p>1 Go ahead. 2 MS. BREDEHOFT: Thank you. 3 Q You were asked about a knife. You were 4 shown Plaintiff's Exhibit 92 and a knife that's, I 5 think, "until death." 6 What is your understanding of the 7 significance of that knife and that phrase as it 8 related to Amber Heard? 9 MR. DENNISON: Objection, Your Honor. 10 No foundation. 11 MS. BREDEHOFT: He showed it in 12 cross-examination. I'm able to ask about it and 13 what her understanding was. He cut her off when 14 she was trying to talk. I'm just letting her go 15 back in. 16 MR. DENNISON: Her understanding of a 17 knife? 18 MS. BREDEHOFT: Let's pull up 19 Plaintiff's 92. 20 Tom, could I get you to do that, 21 please. 22 Q I believe you respond -- in response to</p>	<p style="text-align: right;">4185</p> <p>1 MS. BREDEHOFT: Thank you. 2 Q What is your opinion -- what do you 3 think of that as a clinical psychologist 4 specializing in IPV and trauma? 5 MR. DENNISON: Objection, Your Honor. 6 Can I -- can we approach? 7 THE COURT: Sure. 8 (Sidebar.) 9 MR. DENNISON: We're about to launch 10 into, yet, another undisclosed opinion that's not 11 reflected. 12 MS. BREDEHOFT: This is from 13 cross-examination. 14 THE COURT: I know, but it's still an 15 opinion. I mean... 16 MS. BREDEHOFT: Yeah, but if it comes 17 up in the examination. I didn't raise that with 18 her. This is something he raised and I can ask 19 her about it. 20 THE COURT: You did ask her about it. 21 But I don't think her opinion on -- her opinion on 22 it is a different matter.</p>



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Conducted on May 4, 2022

40 (4186 to  
4189)

<p>4186</p> <p>1 MS. BREDEHOFT: I'll try to rephrase 2 it, Your Honor. 3 THE COURT: Okay. Thank you. 4 MS. BREDEHOFT: Thank you. 5 MR. DENNISON: Thank you. 6 (Open court.) 7 BY MS. BREDEHOFT: 8 Q Dr. Hughes, do you think that the 9 phraseology on the knife bears any relationship or 10 significance to the opinions you've had in this 11 case? 12 MR. DENNISON: Objection, Your Honor. 13 Leading. 14 THE COURT: Sustain the objection. 15 Q What, if any, significance does the 16 phraseology on the knife have to the opinions you 17 have provided in this case? 18 MR. DENNISON: Objection, Your Honor. 19 Beyond the scope of the disclosure. 20 MS. BREDEHOFT: He brought it up in 21 cross, Your Honor. 22 THE COURT: I'll overrule the</p>	<p>4188</p> <p>1 part of your examination? 2 MR. DENNISON: Objection. Beyond the 3 scope of cross. 4 MS. BREDEHOFT: He was asking all the 5 different authority. I'm just establishing that 6 she also looked at photos. 7 THE COURT: I'll sustain the objection. 8 MS. BREDEHOFT: Okay. 9 THE COURT: It's beyond the scope. 10 Q Dr. Hughes, based on everything in the 11 cross-examination and redirect what, if any, 12 changes do you have to any of the opinions that 13 you provided to this jury yesterday? 14 <b>A I don't –</b> 15 MR. DENNISON: Objection. Compound. 16 THE COURT: Overruled. 17 <b>A I don't have any changes to my opinions</b> 18 <b>that I gave yesterday.</b> 19 Q Okay. And do you still hold those 20 within a reasonable degree of psychological 21 probability or certainty? 22 <b>A Yes, I do.</b></p>
<p>4187</p> <p>1 objection. 2 MS. BREDEHOFT: Thank you. 3 <b>A So there are several things. I</b> 4 <b>certainly am aware that, at this time, that</b> 5 <b>Ms. Heard purchased this knife for Mr. Depp. She</b> 6 <b>was engaged in a – her whole – a lot of denial</b> 7 <b>and minimization about the extent of the violence</b> 8 <b>in the relationship. There is a notation in</b> 9 <b>Dr. Bonnie Jacobs' notes about when Mr. Depp</b> 10 <b>uttered this to her, was around the discussion of</b> 11 <b>the prenup. And he said, I don't want one because</b> 12 <b>the only way out of this relationship is death.</b> 13 <b>Dr. Jacobs didn't think that that was</b> 14 <b>funny. Ms. Heard was taking it like, oh, maybe</b> 15 <b>it's endearing. Maybe this is okay. But it was</b> 16 <b>definitely a clinical cause of concern at the time</b> 17 <b>that that phraseology was used.</b> 18 Q Thank you, Dr. Hughes. 19 Now, you were -- you listened to an 20 audiotope and then we shared some additional ones 21 from that. 22 What, if any, photos did you review as</p>	<p>4189</p> <p>1 MS. BREDEHOFT: Thank you. 2 I have no further questions. 3 THE COURT: All right. Is this witness 4 subject to recall? 5 MS. BREDEHOFT: Yes, Your Honor. 6 THE COURT: Ma'am, you can't discuss 7 your testimony with anyone, but you're free to 8 stay in the courtroom, based on your expert 9 testimony, okay? 10 THE WITNESS: Thank you, Your Honor. 11 THE COURT: All right. I think we'll 12 go ahead -- yes, sir. 13 MR. DENNISON: May we approach? 14 THE COURT: Okay. 15 (Sidebar.) 16 THE COURT: Yes, sir. 17 MR. DENNISON: Your Honor, I'd like to 18 make an oral motion to strike those portions of 19 Dr. Hughes's testimony that exceeded the scope of 20 the disclosure, including all evidence related to 21 the MMPI-2, her views on personality disorders, 22 and her testimony relative to the various</p>

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41 (4190 to  
4193)

<p style="text-align: right;">4190</p> <p>1 communications she had with the other doctors as 2 to personality disorders. None of that appeared 3 in any of the four disclosures she made. The 4 MMPI-2 information was Dr. Curry's disclosure and 5 she had every opportunity to rebut it. 6 MS. BREDEHOFT: Your Honor, those 7 needed to be made simultaneously if he was going 8 to -- 9 MR. DENNISON: I did object. 10 MS. BREDEHOFT: I don't agree that you 11 did simultaneously object, and they were in the 12 disclosures, and they were in her deposition. I 13 read through the deposition last night. So I 14 don't think there's any basis, whatsoever, for 15 striking any of those. 16 MR. DENNISON: This is exactly the 17 conversation we had yesterday, where we asked 18 opposing counsel, where, in the disclosure, does 19 it say -- 20 THE COURT: Right. And I sustained 21 that objection. 22 MS. BREDEHOFT: Exactly. Your Honor</p>	<p style="text-align: right;">4192</p> <p>1 (Recess taken from 12:49 p.m. to 2 2:00 p.m.) 3 THE BAILIFF: All rise. Please be 4 seated and come to order. 5 MS. BREDEHOFT: I have one housekeeping 6 matter, Your Honor. 7 THE COURT: Okay. All right. Which 8 ones are those... 9 MS. BREDEHOFT: These are the four tape 10 recordings that we played out of 343. 11 THE COURT: 343? 12 MS. BREDEHOFT: Yeah. Those four that 13 we played. 14 THE COURT: Okay. All right. I assume 15 there's no objection? 16 MS. VASQUEZ: No, Your Honor. 17 THE COURT: Are we ready for the jury? 18 MS. VASQUEZ: Yes. 19 THE COURT: Okay. Sorry, Judy. It's 20 been that kind of day. 21 (Whereupon, the jury entered the 22 courtroom and the following proceedings took</p>
<p style="text-align: right;">4191</p> <p>1 sustained that objection. 2 MR. DENNISON: But it was much broader 3 testimony. I made repeated objections. 4 THE COURT: I'm going to overrule the 5 motion, okay? 6 MS. BREDEHOFT: Thank you. 7 MR. DENNISON: Thank you, Your Honor. 8 (Open court.) 9 THE COURT: Ladies and gentlemen, we're 10 going to go ahead and take our lunch break -- 11 sorry, Judy. 12 Let's go ahead and take our lunch break 13 now. Do not do any outside research, and don't 14 talk to anybody about the case, okay? We'll see 15 you back here at 2:00, okay? 16 (Whereupon, the jury exited the 17 courtroom and the following proceedings took 18 place.) 19 THE COURT: All right. We'll be back 20 at 2:00, then, all right? 21 Thank you. 22 THE BAILIFF: All rise.</p>	<p style="text-align: right;">4193</p> <p>1 place.) 2 THE COURT: All right. Thank you, 3 ladies and gentlemen. Be seated. 4 All right. Your next witness. 5 MS. BREDEHOFT: Your Honor, we would 6 like to call Laura Amber Heard to the stand. 7 Amber -- Amber Laura. 8 AMBER LAURA HEARD, 9 A witness called on behalf of the 10 DEFENDANT AND COUNTERCLAIM PLAINTIFF, having been 11 duly sworn by the clerk, testified as follows: 12 EXAMINATION BY COUNSEL FOR THE DEFENDANT AND 13 COUNTERCLAIM PLAINTIFF 14 THE COURT: All right. Thank you. All 15 right. 16 MS. BREDEHOFT: Thank you, Your Honor. 17 BY MS. BREDEHOFT: 18 Q Will you please state your name. 19 A Yes. It's Amber Laura Heard. 20 Q And what is your address? 21 A I live in Napa Valley, California. 22 Q And how old are you, Amber?</p>

<p>4194</p> <p>1 A I am 36. I just celebrated. 2 Q Okay. And do you have a daughter? 3 A I do. She also celebrated her birthday 4 recently. She's one. 5 Q Okay. And what is your profession? 6 A I am an actor, mostly. 7 Q Okay. Now, why are you here? 8 A I am here because my ex-husband is 9 suing me for an op-ed I wrote. 10 Q And how do you feel about that? 11 A I struggle to have the words. I 12 struggle to find the words to describe how painful 13 this is. This is horrible, for me to sit here for 14 weeks and relive everything here, people that I 15 knew, some well, some not, my ex-husband, with 16 whom I shared a life, speak about our lives in the 17 way that they have. This has been one of – this 18 is the most painful and difficult thing I've ever 19 gone through, for sure. 20 Q Now, there was a trial in the U.K. in 21 July of 2020 where Mr. Depp had sued The Sun 22 newspaper and Dan Wootton.</p>	<p>4196</p> <p>1 background. Tell us where you grew up. 2 A I come from Austin, Texas, a small town 3 outside of Austin that you probably haven't heard 4 of – no one has – called Maynard, and I was 5 raised by my mother and my father and I grew up 6 with a little sister, although I have a big sister 7 as well. 8 Q And your little sister's name is? 9 A Her name is Whit, Whit Heard. 10 Q And how much of an age difference is 11 there between the two of you? 12 A Whitney and I are about one year, I 13 think we're 16 months apart, so right next to each 14 other. 15 Q And what did your father do for a 16 living? 17 A My father broke horses and did 18 construction, had – he painted houses and hunted 19 and fished, but that was for fun. 20 Q And what did your mom do? 21 A She worked for the State of Texas. 22 Q Since you talked about the breaking</p>
<p>4195</p> <p>1 Do you recall that? 2 A Yes. 3 Q And what was your level of 4 participation in that lawsuit in that trial? 5 A Well, I was not party to that lawsuit. 6 I was a witness, I suppose the primary witness, 7 since it dealt with the truth of the relationship 8 that I shared with Johnny. 9 Q And what, if any, role did you have to 10 play with respect to, for example, witness 11 statements and testifying? 12 MS. VASQUEZ: Objection. Compound. 13 MS. BREDEHOFT: I said "for example." 14 THE COURT: Overruled. 15 A I had to write – I think I gave seven 16 witness statements under oath, testimony. I sat 17 on the stand for four days under mostly 18 cross-examination. And up until this point, it 19 was the hardest thing I have ever had to do. 20 Q Thank you, Amber. 21 I'm going to take you back, and if you 22 can just tell the jury a little bit about your</p>	<p>4197</p> <p>1 horses, can you just tell the jury what your role 2 is in assisting your dad on that and what is 3 involved in breaking horses? 4 MS. VASQUEZ: Objection. Leading. 5 Q Can you just tell me about -- 6 THE COURT: Overruled. Go ahead. 7 A Just got to stay on, basically. 8 I would help him. I was more of a 9 crash test dummy. You know, when you train a 10 horse, it's a wild animal, it doesn't necessarily 11 like to be ridden. And there are people out there 12 who are crazy enough, like my dad, to pick that as 13 a profession, I guess, and he was really good with 14 horses, and I was the son he never had, so it was 15 my job to, you know, stay on. 16 Q And what, if anything, did you learn 17 from your father about how to react to the horses? 18 A Well, with training the horses, I guess 19 the key – the key things are to not show fear, 20 not get intimidated, not show fear, be tough and 21 calm. 22 Q Tell the jury a little bit about your</p>

<p style="text-align: right;">4198</p> <p>1 educational background during those growing-up 2 years and your work experience. 3 A I worked any job that I could from the 4 time I was really young. I wanted to get out of 5 Texas and do something with my life and see things 6 and do things. So I was in school and really 7 pushed myself to -- I just always pushed myself to 8 be able to accelerate the process. I wanted to, 9 you know, get out of school as fast as I could, 10 and I wanted to do -- I wanted to do more things 11 with my life than stay in Texas. 12 Q So what types of things -- so where did 13 you go to school when you were younger? 14 A I was a scholarship kid at a Catholic 15 school growing up, several different Catholic 16 schools. But they were always in the other -- you 17 know, on the other side of town in the wealthier 18 part of town, and I grew up quite working class. 19 And thankfully with, you know, as long as I 20 maintained an A average, I enjoyed the benefit of 21 a scholarship, and I did that until I realized 22 that I could take my GED and SATs early, and I did</p>	<p style="text-align: right;">4200</p> <p>1 school I went to, and then I liked it so much I 2 think because it meant I wasn't at home and it was 3 important to me just to not spend time at home. 4 And I -- I really loved meeting people, so I 5 worked at the soup kitchen every morning before 6 school during the school year for about four 7 years. There were -- I didn't go on weekends. 8 But on weekends I would do various things, worked 9 at children's, like, children's museums, 10 typically, because I would work with younger 11 volunteers, and mostly soup kitchens and things 12 involving children. I worked with deaf kids for a 13 while and, yeah, I love it. 14 Q And when you worked with the deaf kids, 15 what, if anything, did you do to learn to be able 16 to work with them? 17 MS. VASQUEZ: Objection. Leading and 18 404. And relevance, Your Honor. 19 THE COURT: Overruled. 20 A Well, I taught myself how to sign basic 21 sign language, and then I -- I pursued it. I 22 audited a translation course at the community</p>
<p style="text-align: right;">4199</p> <p>1 that and placed out of school and effectively left 2 school at 16 years old, I believe. 3 Q And what did you do for work during 4 those younger years? 5 A I took any job that I could. I worked 6 at my father's construction company, sometimes, 7 you know, just administrative stuff. I mean, it 8 was a small company. But I answered phones and I 9 worked at, like, a modeling agency that was also, 10 you know, offered photography classes, makeup 11 classes, hair -- hair and makeup classes for 12 people that were pursuing a career in 13 entertainment, and I started taking classes that I 14 paid for by working there, effectively as a trade. 15 And I eventually worked there long enough to be 16 able to pay for my headshots, which are the 17 pictures that you use in the industry to promote 18 yourself, you know, in whatever, acting, modeling, 19 or both. 20 Q Okay. And what, if any, charitable 21 work did you do when you were still young? 22 A It started off as a requirement for the</p>	<p style="text-align: right;">4201</p> <p>1 college which I ended up going to to get out of 2 high school early later on, but I would audit 3 classes; the teachers never wanted to kick the, 4 you know, random 12-year-old out of their class, I 5 suppose. So I remarkably was able to audit, I 6 think, the majority of two semesters, and that 7 also helped me learn. 8 Q So how did you end up in Los Angeles? 9 A I used -- I met -- I did a small job in 10 Texas where I played a part in a movie, and the 11 actor in the movie that I was playing opposite had 12 an agent visiting him from LA. And I met her on 13 set, and she said that she had heard about me from 14 another bit part I did. You know, I was taking 15 jobs in Austin for, really, anything, to be an 16 extra, to apply -- I did makeup once. You know, 17 nothing -- no job was too small for me, so I put 18 myself out there. And she had heard about me, and 19 she said, "I have heard about you in this town, 20 and I'd love to meet you in LA if you're ever out 21 in LA." 22 And I was, like, "When can I come?"</p>

<p style="text-align: right;">4202</p> <p>1 And she made an appointment with me for the 2 following week, and I used all the \$180 or 3 something to get out there, and that's -- I 4 landed; I didn't know anyone. I was 17. And I 5 have effectively been there ever since, I suppose. 6 Q So when you arrived in Hollywood, 7 please tell the jury what you did to get moving 8 there, get going. 9 A I went to every audition, every 10 casting, every meeting, every appointment that I 11 could. I put myself out there. I didn't have a 12 car because those are expensive, so I took the bus 13 around LA. It was before smartphones. I had a 14 Thomas Guide in my bag and the change of tank 15 tops, not that it mattered. But I went to about 16 ten auditions, sometimes, a day and would change 17 clothes if I needed to in the back of, you know, 18 the bus I was taking, and I just hustled from one 19 audition to the other. And I got a bit part on 20 one thing, and then I got a bit part on another 21 thing. 22 And then eventually my roles kind of</p>	<p style="text-align: right;">4204</p> <p>1 film, and he came out of retirement to do that. 2 And that's kind of just how it was in terms of my 3 career for those initial -- that first initial ten 4 years or so. It was just going from slightly 5 bigger role to slightly bigger role and just 6 working my butt off. 7 Q So I'm going to take you up to 2008. 8 Did there come a time that you auditioned for the 9 Rum Diary? 10 A Yes. I auditioned for that in about 11 2008, I believe. 12 Q Please describe for the jury your 13 experience in auditioning for the Rum Diary. 14 A Well, I auditioned a few times, which 15 is common in my work. You know, you get a 16 callback, as they say, and I think I had at least 17 one, maybe two, callbacks with the director, and 18 then I got a call saying that Johnny, who at the 19 time, was -- I think I knew that he was producing 20 it as well -- was doing a project that was 21 something very personal to him. He was reprising 22 his role as his late friend Hunter S. Thompson,</p>
<p style="text-align: right;">4203</p> <p>1 became more important or bigger, and it's been a 2 slow progression, I guess, since then, you know, 3 of doing either tiny bit parts in bigger movies or 4 doing, you know, larger roles in movies that no 5 one would see. And I guess, you know, it still is 6 kind of like that. 7 Q So I'm going to ask you to go from 2002 8 to 2009. 9 If you could, just describe for the 10 jury a little bit what types of parts you had. I 11 think they've indicated they didn't -- you have 12 not been well known here in this courtroom 13 compared to Mr. Depp. So perhaps just take them 14 through a little bit of that. 15 A Yeah, that's fair. 16 I did small roles in big films, like 17 Zombieland and Pineapple Express, and movies that 18 were well known. My first one was Friday Night 19 Lights. But, again, I had small roles in those 20 bigger films. And then I would do larger roles in 21 kind of smaller films, like I brought -- I did a 22 project where I was the lead in a John Carpenter</p>	<p style="text-align: right;">4205</p> <p>1 and it was a very important project to him and 2 that he wanted to meet me in person. 3 I thought I would be going for maybe an 4 audition, but it was just a meeting. I went to 5 his office and met with him for a few hours. 6 Q And what did you talk about during 7 that, those few hours? 8 A We talked about books and music, 9 poetry. We like a lot of the same -- we liked a 10 lot of the same stuff, you know, obscure writers 11 and interesting books and pieces of poetry that I 12 hadn't heard anybody else reference or know or 13 like. And he was very well-read and charismatic, 14 and, you know, I think I left the office with a 15 few books that he gave me. And we spent the whole 16 time just talking about things that we care about, 17 and I was -- I was so surprised that somebody, you 18 know -- I knew who he was. 19 I wasn't familiar, you know, I wasn't a 20 fan of his work. I wasn't familiar with him, but 21 I knew who he was. You know, he's one of the most 22 famous people in the world. So it was already a</p>

<p style="text-align: right;">4206</p> <p>1 weird thing to go and get called into his office 2 and, you know, I'm a no-name actor. I was 22, I 3 think, and I thought it was unusual. It was weird 4 because he's -- he was twice my age, and he's this 5 world-famous actor and here we are getting along 6 about obscure books and we were, you know, old 7 blues. I thought it was remarkable. You know, I 8 just hadn't really -- I thought it was unusual and 9 remarkable. I left there just feeling like, wow. 10 Q So did there come a time that you 11 learned that you were going to be cast for the 12 role in the Rum Diary? 13 A Yes. A few days later, my agent said 14 that "Johnny's going to call you. We gave him 15 your phone number." 16 I was like, "Oh, okay." 17 And shortly after, my phone rings. I 18 pick it up and I hear, you know, this, like, deep 19 voice on the other line, and he said, "You got 20 the -- you know, you're it, kid. You're the 21 dream. Hunter wrote this part, and you're the 22 dream. You're it, kid."</p>	<p style="text-align: right;">4208</p> <p>1 A It was a bit surreal. You know, 2 filming in a place like Puerto Rico, it was 3 beautiful. It takes place in the '50s, so 4 everything really looked beautiful, you know, cars 5 and clothing, the music. It was just -- it was a 6 very colorful shoot in general. 7 I couldn't have asked for, you know, a 8 better scenario. I was on film -- I mean, I was 9 on set reading my books, and occasionally Johnny 10 would talk to me. And then he started to be 11 really kind to me, like, more open with me. When 12 we'd have hot days filming, you know, there'd be 13 this big SUV pull up, and a security guard would 14 kind of usher me into this car and it would have 15 the A/C blasting, and I'd be sitting in the back 16 of the SUV thinking what a strange experience the 17 whole thing was. 18 And, you know, we didn't really have a 19 whole lot of interaction on set until -- until we 20 did a scene that involved kissing. We had a 21 kissing scene, and it didn't feel like a normal -- 22 it didn't feel like a normal scene anymore. It</p>
<p style="text-align: right;">4207</p> <p>1 I was amazed. 2 Q Please describe for the jury what that 3 means. What was the Rum Diary and this Hunter 4 Thompson? What was the concept here? And what 5 role were you playing? 6 A Well, it was my understanding that he 7 was bringing to life a -- his late friend. And 8 what he told me was that this character is 9 supposed to be the dream woman, like the dream, 10 American dream. And so I knew what he meant. He 11 indicated to me, when he told me I got the role, 12 that I was that, you know, he -- I was the dream 13 kid. That's what he said. 14 Q So did there come a time that you 15 started filming the Rum Diary? 16 A Yes. I'm not quite sure how much -- I 17 think we started filming in maybe March of 2009. 18 Q And where did you film the Rum Diary? 19 A We shot it in Puerto Rico. 20 Q Describe if you can the events of the 21 filming and your interactions with Mr. Depp during 22 that time.</p>	<p style="text-align: right;">4209</p> <p>1 felt -- it felt more real. There are certain 2 things that you do in the job to be professional, 3 like when you have to do that sort of scene, and 4 you don't, like -- you don't use your tongue if 5 you can avoid it. There are certain things that 6 you do to just maintain a certain line, and it 7 just felt like those lines were blurred. I mean, 8 he grabbed my face and pulled me into him and 9 really kissed me. But we were filming a scene. 10 Q Did he use his tongue? 11 A Yes. 12 Q Okay. Did your birthday, did you 13 celebrate your birthday while you were in Puerto 14 Rico? 15 A I did. I celebrated, I think, maybe my 16 23rd birthday there. 17 Q And what, if anything, did Mr. Depp do 18 for your birthday? 19 A Well, we were already kind of talking 20 about books and poetry and things like that. He 21 gave me a few very beautiful poetry books, and he 22 gave me a bicycle, like a vintage bicycle, because</p>

<p style="text-align: right;">4210</p> <p>1 at the time I was riding around on a bike. And I</p> <p>2 had a lot of time off since I was a smaller role</p> <p>3 in the movie. And, yeah, I think that was it.</p> <p>4 Q Okay. Now, did there come a time that</p> <p>5 you ended up visiting him in his trailer?</p> <p>6 A Yes. I think there was – we would</p> <p>7 hang out if, you know, after – or in between</p> <p>8 scenes or in between setups, we often were, you</p> <p>9 know, talking about things and would continue the</p> <p>10 conversation into the trailer, often with the</p> <p>11 director, Bruce Robinson was his name. And then</p> <p>12 at one point we'd talk about wine. That's another</p> <p>13 thing that Johnny and I shared in common, a love</p> <p>14 for wine, red wine. And we were talking about a</p> <p>15 kind of wine that I enjoyed, and I was, you know,</p> <p>16 going on about how great this bargain wine was.</p> <p>17 And I didn't understand, you know, how</p> <p>18 much more sophisticated Johnny's taste in wine</p> <p>19 was. So I was going on about the virtues of</p> <p>20 Malbec or something, and I bought him a bottle of</p> <p>21 this wine and I set it down. And at some point</p> <p>22 I'm going back to get back to set, and he kind of</p>	<p style="text-align: right;">4212</p> <p>1 moved on, went back to set.</p> <p>2 Q And were you in a relationship at that</p> <p>3 time?</p> <p>4 A I was.</p> <p>5 Q Okay. And was Mr. Depp in a</p> <p>6 relationship at that time?</p> <p>7 A That was my understanding, yeah.</p> <p>8 Q Okay. And did anything else of</p> <p>9 significance happen during that time period while</p> <p>10 you were filming with Mr. Depp, other than what</p> <p>11 you've told us?</p> <p>12 A We just had this, you know, it was a</p> <p>13 friendship, flirtatious thing. I felt chemistry.</p> <p>14 I felt this other thing that was – that went</p> <p>15 beyond the pale of my job for sure. Johnny</p> <p>16 clearly felt that way about me, had indicated to</p> <p>17 me that that's how he felt in many different ways.</p> <p>18 But at the same time, you know, we were both in</p> <p>19 relationships, and it's a job and, you know, it</p> <p>20 was intimidating. I just remember feeling kind of</p> <p>21 intimidated and a little nervous about that, and I</p> <p>22 also was in a relationship. So we went our</p>
<p style="text-align: right;">4211</p> <p>1 kicked his, like, you know, foot up in the air and</p> <p>2 basically kind of lifted the back of my bathrobe</p> <p>3 up and --</p> <p>4 Q Okay. Just stop you there. Why were</p> <p>5 you wearing a bathrobe?</p> <p>6 A Because I was doing a scene. It was a</p> <p>7 period film, so it took place in the '50s. And so</p> <p>8 I had all of this old undergarments that were for</p> <p>9 that time era on. And the scene involved me</p> <p>10 changing. So I had all the costume on. And he</p> <p>11 kind of picked up the back of my robe with his</p> <p>12 boot, and I kind of turned around and, like,</p> <p>13 laughed, like, giggled, you know. I didn't</p> <p>14 feel -- I just didn't -- like, I didn't know what</p> <p>15 to make of it at the time, and it just kind of --I</p> <p>16 just kind of giggled and batted away playfully.</p> <p>17 And he kind of playfully kind of pushed me down on</p> <p>18 this, like, bed sofa. But that was in his</p> <p>19 trailer, just playful and flirtatious, and he</p> <p>20 said, "Yum," and he kind of lifted up his eyebrows</p> <p>21 like that (indicating). And I just giggled,</p> <p>22 laughed it off, kind of batted him away, you know,</p>	<p style="text-align: right;">4213</p> <p>1 separate ways, and we didn't hear -- I didn't hear</p> <p>2 from him for a long time.</p> <p>3 Q So approximately how long were you</p> <p>4 filming in Puerto Rico for the Rum Diary?</p> <p>5 A A few months is my best guess.</p> <p>6 Q All right. And when you left Puerto</p> <p>7 Rico and the filming, when is the next time that</p> <p>8 you had any contact from Mr. Depp? And contact</p> <p>9 could include anything, communications, written</p> <p>10 communications as well as telephone or otherwise.</p> <p>11 A We had no contact until Johnny called</p> <p>12 me on the phone one day and I was driving, and he</p> <p>13 invited me over to his home in California, in</p> <p>14 Beverly Hills. And I -- I mean, it was out of the</p> <p>15 blue. I didn't even have his phone number, so it</p> <p>16 was quite unexpected. He called me a second time,</p> <p>17 but I -- I don't think we actually connected or we</p> <p>18 didn't stay on the phone because we didn't --</p> <p>19 well, yeah, we didn't really speak. But the first</p> <p>20 time was the only time I actually spoke to him,</p> <p>21 and he invited me over to his house under kind of</p> <p>22 the -- he said that, you know, we could get Bruce,</p>