

SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF LOS ANGELES

In re the Marriage of

Petitioner: AMBER LAURA DEPP

and

No. BD641052

Respondent: JOHN CHRISTOPHER DEPP
II (AKA JOHNNY DEPP)

VIDEOTAPED DEPOSITION OF AMBER LAURA DEPP

VOLUME II

August 13, 2016

10:00 a.m. - 7:04 p.m.

2049 Century Park East, Suite 800

Los Angeles, California

Reported by:

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CSR No. 5189

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DEPP V. DEPP

Saturday, August 13, 2016

Pamela J. Felten, CSR No. 5189

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1 Los Angeles, California

2 Saturday, August 6, 2016, 10:00 a.m.

3
4 THE VIDEOGRAPHER: Good morning. We're on the
5 record. This is the recorded video deposition of Amber
6 Laura Depp in the matter of Petitioner, Amber Laura Depp,
7 versus Respondent, John Christopher Depp II, taken on
8 behalf of the respondent. This deposition is taking
9 place at 2049 Century Park East, Los Angeles, California,
10 on August 13th, 2016 at approximately 10:01 a.m.

11 My name is Stan Beverly. I'm the videographer
12 with U.S. Legal Support located at 11845 West Olympic
13 Boulevard, Los Angeles, California. Video and audio
14 recording will be taking place unless all parties have
15 agreed to go off the record.

16 MR. KOENIG: Where are Charles and Lenny?
17 Okay.

18 THE VIDEOGRAPHER: Would all present please
19 identify themselves.

20 MS. BERK: Yes. Good morning. Blair Berk on
21 behalf of respondent, John -- Johnny Depp.

22 MR. ALLHOFF: Hans Allhoff on behalf of
23 respondent, Johnny Depp.

24 MS. WASSER: Laura Wasser on behalf of the
25 respondent, Johnny Depp.

1 before she came today.

2 MR. HARDER: Well, she's doing it now.

3 MS. WASSER: Well, it's okay.

4 Maybe it's privileged because it was sent to
5 her attorneys.

6 MR. HARDER: Take your time with this document.
7 Make sure you're comfortable with what this document is.
8 Okay?

9 MS. BERK: Okay. I'll move on.

10 Q Ms. Heard --

11 THE WITNESS: I haven't seen this ever.

12 MR. HARDER: Don't -- don't say anything.

13 THE WITNESS: Okay.

14 MR. HARDER: Just let her ask a question.

15 MS. BERK: I need this.

16 Q Did --

17 MR. ALLHOFF: What is that?

18 MS. BERK: That's her declaration in support of
19 her DVRO.

20 Q In your declaration that you filed in support
21 of your request for a restraining order, did you say --
22 do you have it there so that you can refer to it?

23 A That's what this is, right? It's Exhibit K?

24 Q Exhibit K.

25 Did you say in -- did you claim in paragraph 7

1 that:

2 "After my guests had left, Johnny
3 and I had a discussion about his
4 absence from my birthday celebration
5 which deteriorated into a bad
6 argument that started with Johnny
7 throwing a magnum size bottle of
8 champagne at the wall and a wine
9 glass on me and the floor -- both
10 which shattered. Johnny then
11 grabbed me by the shoulders and
12 pushed me onto the bed, blocking the
13 bedroom door. He then grabbed me by
14 the hair and violently shoved me to
15 the floor."

16 Did you say that when you swore under penalty of
17 perjury and signed your name to this document?

18 A Yes.

19 Q Okay. And did you say in this same document
20 that "Johnny was screaming and threatening me, taunting
21 me to stand up"?

22 A Yes. He did that often in fights.

23 Q Did he do that -- are you saying he did that on
24 April 21, 2016?

25 A Yes. It's something that had been happening a

1 lot lately.

2 Q Did you say in your declaration that "After
3 several minutes, Johnny stormed out of the condominium,
4 but not before tossing aside and breaking nearly
5 everything in his path"?

6 A Yes. Are you asking me if I said that?

7 Q Yes.

8 A Yes.

9 Q And is that the truth?

10 A Yes.

11 Q Okay. After you say he did this, did you call
12 the police?

13 A No, I did not.

14 Q Did you call the police regarding these things
15 you say happened at any time after you say they happened?

16 MR. HARDER: Vague and ambiguous, compound.

17 BY MS. BERK:

18 Q Do you understand my question?

19 A Yes.

20 Q Okay. Did you call the police -- can you
21 answer my question?

22 MR. HARDER: Go ahead.

23 THE WITNESS: Oh, okay. Did I call the police
24 on any of the other occasions or any occasion?

25 BY MS. BERK:

1 Q I'm speaking of April 21 when you make these
2 claims.

3 A No, I did not.

4 Q When you say these things happened on April 21,
5 at any time after April 21, did you call the police about
6 these things you say happened on April 21?

7 A No. I never called the police on Johnny
8 myself.

9 Q Did you ever report to any law enforcement
10 authority other than the police your claims that he did
11 these things on April 21?

12 A No. I attempted as best as I could to hide
13 this and keep our lives as private as -- as possible, and
14 I did what a lot of I guess women do, tried to protect
15 him.

16 Q Were you attempting to hide this when you filed
17 this declaration on May 27, 2016?

18 A It was unhideable because the cops had been
19 called.

20 Q Ms. Heard, when you claim in your declaration
21 that the argument started with Johnny throwing a magnum
22 size bottle of champagne at the wall, um, do you recall
23 that event?

24 A Yes.

25 Q Okay. Did the bottle break?

1 A I don't know if it broke or if there was a
2 bottle on the table next to it that broke and a wine
3 glass next to it that broke, but there was both a wine
4 glass and a bottle. I'm not sure which of the two it was
5 that broke when -- the one that was thrown at me but
6 missed, or if it was the one perhaps sitting on the table
7 nearby. But our paint -- the painting behind it, behind
8 it that rests on the wall behind where I was standing,
9 still is missing a big chunk out of it. So --

10 Q Did the bot- --

11 A -- it made quite an impact.

12 Q Are you finished? I want to make sure if
13 you're finished or not.

14 A Yeah.

15 Q Okay. Did the bottle you refer to, did it ever
16 touch your body?

17 A No.

18 Q Did the wine glass you refer to in reference to
19 the bottle ever touch your body?

20 A Uh, pieces of it did. That's -- it shattered.

21 Q Okay. Where did the pieces you say touched
22 your body touch your body? What part of your body?

23 A I don't remember exactly what part of my body
24 was touched by the glass breaking upon impact. I do know
25 that it touched my body, knees and hands -- no, not my

1 hands -- my knees anyway when I went down to the floor,
2 or some version of my legs when I went down to the floor
3 later in the fight, but nothing significant. Not like
4 Australia or anything.

5 Q Were there any injuries to your body at the
6 places you claim the wine glass touched your body?

7 A No, I don't think so.

8 Q Was there --

9 A Not that I saw.

10 Q -- any indication that you could see on your
11 body that the wine glass shards had touched your body?

12 A No. Not that I could see.

13 Q Okay.

14 A Or nothing that I remember.

15 Q At the time the wine glass touched you, as you
16 claim it did, was it intact or was it already broken?

17 A I can't tell because it was -- I assume it was
18 shattered upon impacting -- impact with the magnum size
19 bottle of wine that was thrown. Um, I'm assuming that's
20 what shattered it. But at some point there was glass
21 everywhere and, um, I was standing right next to it.

22 Q When it -- when you claim it touched your body,
23 where specifically in the apartment were you standing?

24 A Uh, I was standing in our bedroom.

25 Q Okay. And where did the bottle and glass end

1 what -- what -- what was on the floor of your bedroom as
2 you described it and where it was --

3 A I -- I don't --

4 Q -- from this incident?

5 A I don't remember.

6 Q Was --

7 A I don't --

8 Q Was there anything in addition on the floor in
9 addition to the broken wine bottle and a broken glass?

10 A Uh, broke -- wine. Um, wine, as well, but it
11 might have been dried up by the time -- um, by the time I
12 left. I don't really remember what else.

13 Q In terms of the broken glass you claim was on
14 your bedroom floor, could you describe specifically where
15 it was on your bedroom floor relative to your bed?

16 A Uh, it was around my bed because the paint --
17 and probably by the entrance of the door, as well, but
18 I'm not exactly sure.

19 Q Okay.

20 A There was a lot of -- we were -- there was a
21 lot of fighting and a lot of movement in several
22 different parts of our room. So when he was holding me
23 down on the bed and I was trying to stand up, that was by
24 the bath -- closer to the bathroom and I know there was
25 broken glass there. When I was -- when I tried to get

1 out of the bedroom door and he blocked it and shoved me
2 back down to the floor by the -- that was by the -- by
3 the entrance to the door. And I can't remember what else
4 was breaking and what had been knocked over. I know the
5 lamp -- the lamp broke, as well. I didn't mention that.
6 It's still in -- in the storage closet. I just saw it
7 the other day. And it has wine on it. You know, I found
8 it the other day. But --

9 Q Did you take pictures of that at any time?

10 A No. Not that I recall.

11 Q Did you bring that with you today?

12 A I did not bring that with me. The lamp?

13 Q Yes.

14 A No, I did not bring the lamp with me today.

15 Q Okay. Were you ever asked to locate any of the
16 items that were -- that you say were damaged or broken
17 from April 21?

18 MR. HARDER: Privilege. Don't answer.

19 (Instruction not to answer)

20 BY MS. BERK:

21 Q Did you ever make any attempts to locate any of
22 the items from 21 -- from April 21 that you say were
23 damaged or broken?

24 A No.

25 Q Okay. And, in fact --

1 A Oh, my -- yes, I'm sorry. My phone. I tried
2 to find my phone, but I never recovered it.

3 Q And in the DVRO that you filed with the Court,
4 did you attach any photographs whatsoever from the events
5 you claim on April 21, 2016?

6 MR. HARDER: The Court filing would speak for
7 itself.

8 BY MS. BERK:

9 Q To your knowledge..

10 A I don't know what we attached off the top of my
11 head.

12 Q Okay. Do you know what you gave any other
13 person for the April 21 -- relating to the April 21
14 events?

15 MR. HARDER: If it has to do with lawyers, it's
16 privileged.

17 BY MS. BERK:

18 Q Ms. Heard, can you tell me exactly what you say
19 happened, uh, uh, on -- in the argument you had with --
20 you say you had with Johnny on April 21?

21 A What was the question exactly if you don't mind
22 me asking?

23 Q What happened?

24 MR. HARDER: She wants to hear you tell what
25 happened.

1 THE WITNESS: I was -- Johnny and I, when we
2 made it back to our apartment, I was being cold to him.
3 I -- I wasn't being very -- I wasn't being as, you know,
4 open or friendly as I normally am. Um, it was -- I
5 was -- I was crushed that he missed my birthday. And
6 this is after a month of him not coming home like five
7 nights a -- on average five nights a week. Just not
8 showing up or showing up at like 2:00, 3:00, 4:00 o'clock
9 in the morning or at like 8:00 o'clock in the morning,
10 I'd find out that he was passed out at one of the other
11 places in West Hollywood. So it had been building up.

12 And -- and so the birthday incident was
13 heartbreaking. It was my 30th birthday. And I was just
14 so sad about it.

15 MR. HARDER: She --

16 THE WITNESS: So we -- he asked me -- he -- we
17 got in bed and I was just being quiet. I think I picked
18 up my book and tried to read, and he said, um, "What's
19 your fucking problem?"

20 And I said, "I'm just hurt." And I had been
21 seeing this -- you know, I've been trying to get us to
22 see a marriage counselor -- who said that that's how I
23 should like word things, as opposed to it being
24 accusatory, and I said, "I'm just hurt. Hurt that you
25 didn't make it to my birthday party." And then it

1 quickly deteriorated into the normal, "It's my fault.

2 Why do you always blame me for everything? You always

3 blame me for everything."

4 BY MS. BERK:

5 Q Okay.

6 A And then it escalated and he -- I don't know
7 what I said that immediately preceded it, but he -- the
8 first big action was the wine bottle that I remember
9 being thrown at me. Or -- or maybe it was that I was
10 trying to leave. I don't really remember which of the
11 first --

12 Q Was that while you were in the bed that the
13 wine bottle was thrown at you?

14 A No. It was in -- I was standing in the
15 bedroom.

16 Q Okay.

17 A In front of this painting, kind of closer to
18 the bathroom. And when I moved to leave, um, he shoved
19 me at some point, shoved me down on the ground. I stood
20 back up and, um, and then he did -- he did this taunting
21 thing where I guess it -- it was to challenge me to see
22 if I was really going to leave. "You think you're really
23 going to be the little -- want to leave. You really
24 think you're that tough, huh? Tough guy. Tough guy."
25 And then shoved me down again. I stand back up. Again,

1 "You think you're so tough."

2 And eventually I did make it out of the
3 bedroom, um, and -- and, um, I don't -- I don't know if I
4 was walking back from where my clothes are with an
5 overnight bag and I have to pass through the office
6 because of the adjoining apartments, but in my passing
7 him, um, he grabs my hair at some point, um -- well, we
8 were arguing kind of in passing as I'm walking through
9 the office and as I make it around the edge of the desk,
10 it's either a shove to initiate or something with my
11 head, a push or something, and it turns into him grabbing
12 me by the back of my hair. And -- and I -- and I -- and
13 I -- and I -- I -- I said some, you know, comment to him,
14 I don't remember what it was, and walked into the
15 bedroom, grabbed my -- to grab my toothbrush, things like
16 that that I don't keep in -- in my closet room, and in
17 doing that, um, we had more of a -- more of a fight. It
18 was pushing, um, uh -- I -- I put my hands up like this
19 once.

20 MS. BERK: Let the record reflect the witness
21 is raising her hands above her head.

22 MR. HARDER: You're interrupting her. She's
23 being videotaped. Don't interrupt her, please. She's --
24 she's telling her story.

25 Go ahead.

1 THE WITNESS: Um, yeah. I put my hands up and
2 he did this, he pushed them down, and squared off to me,
3 bumped his chest into mine. I kind of fell back a little
4 bit onto the bed. I stood back up and, um, tried to --
5 tried to get -- walk past him to the door. At some point
6 I end up on the floor. Um, I don't -- um, he walks out.
7 Um, I tried to actually even at that point say, "Don't
8 walk out. Like we just need to talk about it. You know,
9 can we just take a break and then just talk? Because
10 it's my birthday. And I don't want to wake up on my --
11 you know, my birthday -- we have -- we've had a million
12 of these fights. Just don't leave. I just don't want to
13 wake up on my birthday by myself. Don't go, please."

14 Even though it had gotten violent, this is
15 nothing compared to so many of the other things. I -- it
16 actually wouldn't even be a major thing if -- if it
17 weren't one of the just most recent -- this is not a bad
18 thing. I mean it wasn't bad in my head in relation to
19 what I -- what we have lived through.

20 MR. HARDER: Say what happened.

21 THE WITNESS: Sorry. Um, it -- it escalates.
22 I tried to get him to stop in that moment and he -- and
23 he -- and he broke a bunch of shit in the kitchen. I
24 think he wrote on the countertop -- I think that's one --
25 one of the times he wrote on the countertop in Sharpie

1 some -- some crazy message to me. And I -- I -- I went
2 upstairs. I heard him kind of coming in and out and --
3 and then when I walked downstairs -- it was quiet for a
4 really long time. When I walked back downstairs, there
5 was just a note on the floor that said, you know, "Happy
6 fucking birthday."

7 BY MS. BERK:

8 Q Was there -- was there any other debris on the
9 floor downstairs other than on the countertops in the
10 kitchen?

11 A I don't remember. I know he -- he smashed --
12 he -- he was -- he knocked over lamps and a statue thing
13 and paintings. And he's gotten really into -- he had
14 been punching photographs with me in them recently and
15 this was one of those times, but nothing that I --
16 nothing downstairs specifically that I remember at this
17 moment.

18 Q Okay. And did I hear you say you had tried to
19 convince Johnny to stay to talk about it?

20 A At some point in the argument, yeah.

21 Q Okay. And were you successful in getting him
22 to stay?

23 A No. No. Just -- just long enough to have it
24 explode.

25 Q And at any --

1 BY MS. BERK:

2 Q To your knowledge that you saw.

3 A I can't remember.

4 Q During the call with iO Wright, please tell us
5 exactly what happened.

6 A She picked up the phone and I said, "Hey, babe,
7 um, just for clarity, I'm here with Johnny, he's upset
8 about some things. Can you just clarify and we can put
9 some things to bed?"

10 She said, "What?"

11 And I said, "Were you over here on the morning
12 of my birthday?"

13 And she said, "Why are you asking me that?"

14 And "Of course I wasn't. I met you in Palm Springs."

15 And I said, "I'm here with Johnny and he's
16 upset about something and I just want to put it to bed."

17 And she said, "No. I" -- you know, like I
18 don't know if she got much more out because he started
19 screaming, grabbed the phone out of my hand -- she was on
20 speakerphone -- and he started yelling at her.

21 Q Were you holding the phone prior to -- the
22 phone that you were speaking to iO Tillett on?

23 A Yeah.

24 Q Okay. And you claim that he then grabbed the
25 phone for you -- from you?

1 A He grabbed the phone from me and then before he
2 went upstairs, presumably to pack a bag or get some of
3 his things as he indicated to me, he, you know, like
4 tossed it on -- in -- tossed it in my direction or
5 something on the table or on the couch, I can't remember
6 which. I picked it up and I said, "Oh, my God, iO" -- I
7 can't remember if the call disconnected and it was two
8 separate calls or if it was one call, but I remember
9 saying to iO, "Oh, my God, I'm so sorry. I did not call
10 you to get screamed at." Because she answered the phone,
11 the poor thing, without any real expectation, just
12 started being screamed at by Johnny this way, and I
13 didn't want to make it seem like I called her for a setup
14 to just be yelled at. And -- and -- and -- and he was
15 saying, "You know, you dike bitch, you -- you know, your
16 ten cent words and your fucking book deal and your
17 fucking sell out my family," you know, just the worst
18 things that you can -- expletives and -- and -- and very
19 personal things to her situation. And he started to go
20 upstairs and I had the phone in my hand again and I'm on
21 speakerphone, and -- and he -- he makes it upstairs --
22 makes it partway up the stairs and she says, "It is -- it
23 does not sound safe. Get out before it gets worse this
24 time. Get out of there. Get out. It's not safe."

25 And all of my friends who are informed of our

1 history are very very very very scared of me being alone
2 in a room with him when there are things wrong, when
3 we're fighting, when we're working things out, and when
4 he's using. So she was very clear and on speakerphone
5 saying, "Get out of the house. It's not safe. It
6 doesn't sound safe. Get out." And he heard it and it
7 was -- it -- it was like a -- um, like a -- he just -- he
8 turned around, bolted back down the stairs, grabbed the
9 phone, and -- and -- and started screaming at her even
10 louder this time and even worse this time. And really
11 lit into her. And I'm sitting on the couch. I haven't
12 even gotten up off the couch. My legs were cross-legged.
13 And -- and he -- and he -- he says, "You want her so
14 much, you -- you -- you dike bitch, you want to be her
15 man now, you want to be a man to her now, you can fucking
16 have her." And he winds up his hand -- he winds his arm
17 back and he throws the phone at me. And it -- it hits
18 me, bam, right in the -- what felt like the eye. And it
19 just felt like this pop or what I thought was a pop and
20 it -- it just felt -- I -- it felt -- I -- and I put my
21 head in my hands and when I had my head covered, I didn't
22 know what he was doing or where he was going, but I had
23 my head down and I was saying -- I think I was crying and
24 I said, "You've hit me." It -- it -- it -- it -- and
25 then I -- I could hear him yelling and knocking things

1 over. And I wanted him to know that -- that he had hurt
2 me because sometimes he wouldn't remember these
3 incidences. And so I remember I said, "Johnny, you -- it
4 hit me in the eye." And I don't know -- it felt like
5 my -- it just felt like -- um, it felt like my eye or it
6 could have been my eye and I didn't know, you know, um.

7 Q Okay. Before we get to the injuries, let me
8 just ask you about what you say happened with Ms. Tillett
9 Wright.

10 A Sure.

11 Q Was she on the phone during all of this?

12 A Yes. But at the time, I wasn't sure. Because
13 the phone, after it impacted my face, fell on the ground.
14 So . . .

15 Q Okay. Isn't it true that, Ms. Heard, you
16 yelled to Tillett Wright to call 911?

17 A I -- I don't remember yelling that. I'm sure
18 I -- I --

19 Q Okay.

20 MR. HARDER: Well --

21 THE WITNESS: I'm sure I -- I -- I yelled,
22 "Help. Help." I don't know what -- it was traumatic.

23 BY MS. BERK:

24 Q Isn't it the truth, Ms. Heard, that you swore
25 in your declaration at line 11, page 3, that I then

1 yelled out, quote, "Call 911," end quote?

2 A Yeah. Then I -- then I said that. This was
3 taken immediately after and it's been a while.

4 Q Okay. So you did yell to -- for Tillet Wright
5 to call 911 --

6 A Yeah.

7 Q -- correct?

8 A Yeah.

9 Q Okay. But didn't you testify earlier that you
10 had kept these abuse allegations secret?

11 A Not from everybody.

12 Q Okay. So --

13 A There was -- like I said earlier to you, my
14 select -- my select group was starting to become more and
15 more informed of it as time went on. So at the very
16 beginning, I would only tell my mom who -- somebody who
17 understands this sort of situation. And then I --

18 Q So your mom?

19 A And then I --

20 Q You told her that you had been physically
21 abused by Johnny Depp?

22 A Yeah. I would tell her from the -- almost --
23 almost at the very beginning I confided in her. That's
24 why I had pictures. Yeah.

25 Q Okay. So from the very beginning, to this

1 incident, May 21, you had confided in your mom?

2 A Yeah. I think I probably hid the first few
3 incidences, but very very soon into it, I started to tell
4 her.

5 Q Okay. And you confided in other people,
6 including your friends, correct?

7 A Therapists until -- until it became
8 problematic. Um --

9 Q Okay. When you confided in your therapist --
10 when did you confide in your therapist that you've been a
11 victim of domestic violence?

12 MR. HARDER: I'm -- I'm just going to object on
13 the grounds of the therapist privilege.

14 THE WITNESS: Okay.

15 MS. BERK: She's just told us what she told her
16 therapist, therefore, under the law, she's waived any
17 claim as to privilege for me asking her what she told her
18 therapist.

19 MR. HARDER: Well, that may have been
20 inadvertent. I'm -- I'm asserting it right now. If I --
21 if I didn't catch it the first time, it was probably
22 quick and I apologize.

23 BY MS. BERK:

24 Q Ms. Heard, when did you have this conversation
25 with your therapist about these events? We don't have to

1 Q Okay.

2 A -- but it was -- it didn't hurt me.

3 Q Okay. And was there any other act of violence
4 against you prior to when he went upstairs, came back
5 downstairs and threw the phone?

6 A I don't -- I don't know if you'd count
7 screaming at me --

8 Q Okay.

9 A -- or -- but no --

10 Q Other than --

11 A -- physical.

12 Q Okay. Other than screaming, had he broken
13 anything in the apartment yet --

14 A Um --

15 Q -- on the floor?

16 A I'm not sure.

17 Q You're not sure?

18 A I'm not sure.

19 Q Okay. Had he thrown any bottles prior to your
20 saying he threw this phone?

21 A I'm not sure. I'm not -- I can't remember now.
22 I'm not sure what -- what he did prior to throwing the
23 phone at me.

24 Q Okay. Was there any broken glass on the -- on
25 the floor where you were prior to his throwing the phone

1 at you?

2 A Was there any broken glass on the floor around.

3 Q Anywhere on the floor of the room you both were
4 in prior to when he threw the phone at you that you were
5 aware of.

6 A At this moment, I don't remember there being
7 any.

8 Q Okay. Okay. And after you say he threw the
9 phone at you, what happened next?

10 (Sotto voce discussion among petitioner's
11 counsel off the record)

12 THE WITNESS: Um, all I remember is him
13 screaming these expletives at my friend iO and telling
14 her that he -- that she could have me now and then he
15 threw his arm back and he threw the phone --

16 BY MS. BERK:

17 Q Okay.

18 A -- at what appeared to be very -- as hard as he
19 could at my face. I put my head down. I said, "You hit
20 me." I was crying. I said, "Johnny, you hit me,"
21 because then I start hearing things being smashed. And I
22 said to him, "Honey, you hit me. You hit me in the eye.
23 My eye. My eye." And I start crying and I -- he
24 approaches me, and I don't know if he -- if I, in feeling
25 him approach, anticipate to try to get up or if I help

1 him help me up or if he just did it all by grabbing my
2 hair, but for some reason, I mean, I had some aid in
3 getting up off the couch by him -- him grabbing my head,
4 mostly on my right side like a -- the impact of which was
5 significant in and of itself. He grabs my -- he grab --
6 grabs my head, takes a fist full of my hair and says, "I
7 hit your eye? I hit your eye, huh? Let me see your eye.
8 Let me see. Let me see your eye. What if I pull your
9 hair back?" And he yanks my head back and he's -- I
10 don't know, smacking my face or moving my face or -- and
11 he's got me by the hair and he's, um -- it's hard to
12 describe. It's -- he was like yanking me from side to
13 side with my -- with my hair.

14 Q Are you standing up at this time?

15 A Yeah.

16 Q Okay. And has he pulled out any hair from your
17 head?

18 A I -- he's still holding on to my head --

19 Q Okay.

20 A -- at this time and he said -- um, I don't know
21 if he's trying to grab my face or he's hitting my face.
22 I don't know what's happening, but he's yelling at me,
23 he's screaming about -- about my -- about "Let's see how
24 hard I hit you." And -- and I'm screaming at the top of
25 my lungs --

1 Q Okay.

2 A -- "Help, help. Please help." I guess I say
3 call 911. I'm screaming for help, not just in case iO is
4 on the phone, which I don't know, because the phone is
5 somewhere -- after hitting my face, I don't know where it
6 ricocheted and bounced off to -- but it's on the floor.
7 I can only hope she's on the line. But I know and guess
8 security is somewhere. And even though they never
9 respond when I'm screaming "Help" ever, I'm screaming
10 "Help" as loud as I can. I also text Rocky previous,
11 "It's amping up. It's getting crazy again. Please just
12 I need you to come over." Because I thought another
13 third party might be --- a third party being present helps
14 always to --

15 Q Is it your testimony --

16 A -- calm things. Because I --

17 MR. HARDER: Can we take a --

18 BY MS. BERK:

19 Q Is it your testimony, Ms. Heard, that --

20 MR. HARDER: Can we take a break, please.

21 MS. BERK: No.

22 MR. HARDER: She's upset. She's upset.

23 MS. BERK: She has not --

24 MR. HARDER: It's clear that she -- yeah.

25 She's crying and she's upset.

1 THE WITNESS: It's okay.

2 MR. HARDER: Blair, how can you possibly force
3 her to answer questions --

4 MS. BERK: Because I see --

5 MR. HARDER: -- when she's crying --

6 MS. BERK: -- the witness is not --

7 MR. HARDER: -- and upset?

8 MS. BERK: -- upset and hasn't requested.

9 Q Do you need to take a --

10 MR. HARDER: I'm requesting --

11 BY MS. BERK:

12 Q -- a break --

13 MR. HARDER: -- on her behalf.

14 BY MS. BERK:

15 Q -- Ms. Heard?

16 MR. HARDER: Yes.

17 THE WITNESS: Yes.

18 MS. BERK: Let the record reflect Mr. Harder is
19 answering for Ms. Heard yes --

20 THE WITNESS: I answered as well.

21 MS. BERK: -- and Ms. Heard --

22 MR. HARDER: She --

23 MS. BERK: -- responded yes.

24 We'll take a break and go off record at this
25 time.

1 Q And he broke wine bottles?

2 A I don't know to what ex- -- what -- I don't
3 know what things he broke in front of them or what
4 happened -- I am on the couch crying, being covered by my
5 best friend after having this happen to me, so I have
6 limited ability to tell you what exactly was broken
7 when -- when Jerry or Sean's eyes are pointed in any
8 specific direction.

9 Q And you're claiming that Sean Bett and Jerry
10 Judge stood there and did nothing, though, while this was
11 happening, correct?

12 A They weren't there the whole time.

13 Q During the period they were there, your claim
14 is that they did nothing, correct?

15 A They walked in and most of it had been done.
16 Um, he had already, um, charged at me till Raquel threw
17 herself in between us, put her arms up to protect us. He
18 had already pushed Raquel's arms away, intimidated her.
19 We're both back down on the couch. She's protecting me
20 and he's screaming at me at the top of his lungs, which I
21 can only guess served as the impetus to get Jerry Judge
22 and Sean into the room. While he's screaming at -- at me
23 and I'm looking down and he's screaming at me and taking
24 a step closer and screaming louder each time, "Get the
25 fuck up, Amber. Get the fuck up. Get the fuck up.

1 Amber, you hear me? Get the fuck up."

2 And I can only imagine, because it was so loud
3 toward the end, that they came in. I -- so I can't tell
4 you the exact moment, was it at the third threat or the
5 tenth threat when they walked in, but at some point they
6 walked in --

7 Q Was --

8 A -- and --

9 Q Was --

10 A -- he turned his head and I hopped up off the
11 couch, ran to the side corner of the room and said,
12 "Jerry, help me. If he hits -- if he hits me one more
13 time, I will call the -- I will call the police."

14 Q But you'd already asked to call 911 by that
15 point, correct?

16 A I didn't know if iO was even on the phone when
17 I was screaming.

18 MS. BERK: Objection. Nonresponsive. Move to
19 strike.

20 Q You had already asked to call 911 by the time
21 you say Jerry Judge was there, correct?

22 A That's incorrect, because that's to assume that
23 I knew somebody -- I had somebody to whom I could ask to
24 call.

25 Q Did you ask to call 911 prior to when Jerry

1 Q Okay. And your claim is that there were marks
2 on your face prior to the police arriving, correct?

3 A I don't know if there were marks on my face or
4 how puffy or how red it was. I don't know how it looked
5 because I probably didn't spend any time looking in a
6 mirror immediately after.

7 Q Is it your testimony that there was in
8 Penthouse 5 bottles broken? Correct?

9 A In Penthouse 5?

10 Q Yes.

11 A Yeah. There -- Penthouse 5 was destroyed.

12 Q Destroyed. Glass on the floor?

13 A Yes.

14 Q Wine spilled?

15 A Yes. In the hallway, as well.

16 Q Clear signs that there was damage --

17 A We have pictures.

18 Q -- and vandalism in Penthouse 5 --

19 A Yeah.

20 Q -- downstairs?

21 A There was clear damage done downstairs in
22 Penthouse 5.

23 Q And you believed you had clearly been assaulted
24 by Johnny Depp, correct?

25 A Are you asking me if I believe I had been

1 A Yes.

2 Q Isn't it a fact when they made that inspection
3 of Penthouse 5, they did not see any broken glass on the
4 floor?

5 A I don't know what they -- what they saw or
6 didn't see. I wasn't ushering them around. They did
7 that by themselves. I guess maybe Josh was showing them
8 around. But there was extensive damage to which we have
9 plenty of evidence.

10 Q Is it your testimony here today that the
11 officers saw extensive damage?

12 A I don't know what the officers saw.

13 Q Had any of the damage been cleaned up when the
14 officers arrived? By you?

15 A Um, by the time the second set of officers
16 arrived, we had cleaned up the kitchen and cleaned up a
17 bit and cleaned up, yeah.

18 Q By the time the first officers arrived, had you
19 cleaned up any damage to Penthouse 5?

20 A I don't think so.

21 Q Okay. Isn't it a fact that you went with the
22 officers to Penthouse 5, the first set of officers?

23 A No.

24 Q Is it your testimony that you never went to
25 Penthouse 5 with either of the officers of the first set

1 Q Did you ever tell any officers at your house on
2 May 21, 2016 that the -- that Johnny Depp had ever done
3 anything wrong to you that night or before?

4 A You're asking me if I've told them --

5 Q If you --

6 A -- that he --

7 Q -- told them on May 21, yes.

8 A Again, I said to them, "I decline to give any
9 statement at this time as per the advice of my counsel."

10 Q Did the police --

11 A They did make a comment to me about it seeming
12 unsafe, that's why they needed to check the apartment.
13 They made a gesture to my face. They said I looked hurt.
14 They also pulled me aside and said, "Look, just say --
15 just say a statement. We can make sure you're safe, just
16 say statement or give us a statement and we'll go get the
17 guy." And they said the exact same thing to Josh.

18 Q Is it your testimony that a police officer on
19 May 21 --

20 A Yes.

21 Q -- told you that it appeared you looked hurt?

22 A He gestured -- he or she gestured, I can't
23 remember which one, to my face and said, "It's -- we can
24 tell you've been hurt" or "You don't look good" or
25 something to that effect, but I don't remember the exact

1 words they used.

2 Q But something to that effect?

3 A Yes.

4 Q Is it your testimony -- well, let me ask you.

5 Did the officers ever say they saw enough to arrest

6 Johnny when they were with you on May 21, 2016?

7 A Well, they said to both myself and Josh that
8 all I needed to do was give a statement in order for them
9 to go get the guy or go make an arrest. Maybe they
10 didn't use the word arrest to me, but . . .

11 Q And your testimony is here today that one of
12 the officers told you that?

13 A Yes.

14 Q And was it a male officer or female officer?

15 A Like I said, I -- I -- I -- really I can't
16 remember which one it was.

17 Q During --

18 A They asked --

19 Q -- the time the police arrived -- from the time
20 the police arrived till they left, did you ever at any
21 time call any other human being on a telephone?

22 MR. HARDER: What?

23 BY MS. BERK:

24 Q While the police were at your property on
25 Broadway, did you ever call on the telephone any other

1 to strike.

2 Q Ms. Heard, I'd like you to listen to what I'm
3 about to play. Would you do that?

4 (Audio clip played as follows:

5 "MALE VOICE: I then stood up. I
6 don't even know if I said -- I mean
7 I might have said like 'What the
8 fuck,' you know, whatever, because I
9 had just been hit in the head with
10 the fucking corner of the door.

11 "FEMALE VOICE: I'm so sorry I did
12 that. I'm sorry."

13 "MALE VOICE: And then I stood up.")

14 BY MS. BERK:

15 Q Do you recognize the voices on that tape?

16 A Uh-huh.

17 Q And who are the people on that tape?

18 A That's Johnny and I.

19 Q Okay. And is Johnny describing an act where
20 you made a door go into his head?

21 MR. HARDER: Objection. Harassing,
22 argumentative, vague.

23 THE WITNESS: I -- I was trying to escape from
24 a room where Johnny was attacking me. And in order to
25 escape, I was trying to get onto the other side of the

1 door attempting to close the door and he was attempting
2 to get in, despite my attempts to try and escape an
3 assault.

4 BY MS. BERK:

5 Q Isn't it true that on this tape that was just
6 played, you tell Johnny Depp you're sorry?

7 A Yes.

8 Q Okay.

9 (Audio clip played as follows:

10 "MALE VOICE: And then you fucking
11 clocked me.

12 "FEMALE VOICE: I remember hitting
13 you as a response to the door
14 thing.")

15 BY MS. BERK:

16 Q Did you just tell Johnny Depp in that recording
17 that "I remember hitting you as a response to the door
18 thing"?

19 A Yes. As he was trying to get into the door, I
20 was trying -- into the room, I was trying to escape him.
21 He pushed the door into me and I was trying to hit him by
22 getting out -- getting him out of the door to stay in the
23 room.

24 Q And you told him in that tape recording that
25 you hit him, correct?

1 A I don't -- I don't know what words I used in
2 that. You can play it back if you want, but I don't
3 remember exactly how long.

4 Q If you wouldn't mind, if you'll continue to
5 listen.

6 A Okay.

7 (Audio tape played as follows:

8 "FEMALE VOICE: And I'm really sorry
9 about hitting you with the door. It
10 was -- or hitting your head.")

11 BY MS. BERK:

12 Q Did you tell Johnny Depp at that time you were
13 speaking to him that you were really sorry for hitting
14 you -- hitting him with the door hitting him?

15 A I was -- I think in that recording I made it
16 very clear that I was sorry that the door hit him while
17 he was trying to get into the room I was escaping or
18 attempting to escape into.

19 MS. BERK: I will mark, uh, uh, um -- excuse
20 me. I'd like you to listen to the following tape. This
21 is "Punch" and we need to have a --

22 MR. O'DONNELL: Are these being marked as
23 exhibits?

24 MS. BERK: Yeah, mark as exhibits.

25 MR. ALLHOFF: We just marked P as the one we

1 just played. Correct.

2 MS. BERK: Yes.

3 MR. ALLHOFF: Okay. Next.

4 (Exhibit P marked)

5 MS. BERK: The next thing I'm going to play to

6 you is Q. Would you listen to this, please.

7 Punching. The one that says "Punching."

8 (Exhibit Q marked)

9 (Audio tape played as follows:

10 "MALE VOICE: Probably just a shitty

11 lock.

12 "FEMALE VOICE: Yeah, I didn't do

13 that.

14 "MALE VOICE: Anyway, I opened the

15 bathroom door when you were knocking

16 on it. After a few times, I opened,

17 and, you know, you just kept come --

18 you just kept going, you just kept

19 going, kept going. I tried to close

20 the door three times, you know.

21 Please, please, just don't let --

22 you know, and then --

23 "FEMALE VOICE: Babe --

24 "MALE VOICE: Wait. And then I then

25 I -- I -- I -- accidentally, I

1 swear, when I was trying to close
2 the door, I guess it scraped your
3 toes. I -- you know, I didn't mean
4 to do that. And I bent down and you
5 either pushed or you kicked -- I
6 think you kicked the door open.

7 "FEMALE VOICE: I didn't know I did
8 that.

9 "MALE VOICE: I mean sort of caught
10 the door, yeah, more open so it
11 would hit me.

12 "FEMALE VOICE: No. I didn't --

13 "MALE VOICE: Wait.

14 "FEMALE VOICE: I didn't not mean to
15 do that.

16 "MALE VOICE: Wait. And it hit me
17 in the fucking head.

18 "FEMALE VOICE: I did not mean to do
19 that.

20 "MALE VOICE: I was bent down behind
21 the door.

22 "FEMALE VOICE: I did not do
23 anything to -- I did not kick the
24 door or push the door so that it
25 would hit you. I did not. I swear.

1 I mean that did not -- it was not my
2 intention. I think I remember when
3 the door scraped my toes.)

4 BY MS. BERK:

5 Q Okay. So you told him in that excerpt that you
6 hit him with a door but did not intend to hit him,
7 correct?

8 MR. HARDER: The recording speaks for itself.

9 BY MS. BERK:

10 Q Did you say that?

11 A I -- I said whatever I said in that recording.

12 Q Okay.

13 A I don't -- when you play it for me, it's hard
14 for me to remember every single word.

15 Q And that's a recording marked as Exhibit -- the
16 punching?

17 MR. ALLHOFF: Q. What you just played?

18 MS. BERK: Q. Q.

19 Q Would you continue to listen to Exhibit Q?

20 A Uh-huh. Are these from the same day?

21 (Audio recording played as follows:

22 "FEMALE VOICE: I -- I reacted, but

23 this whole -- the door thing, I

24 never -- I never did that. That

25 wasn't on purpose. I might have

1 done it on accident.

2 "MALE VOICE: Okay. So let's say
3 that was an accident. I then stood
4 up. I don't even know what I said.
5 I mean I might have said like 'What
6 the fuck," you know, whatever,
7 because I had just been hit in the
8 head with the fucking corner of the
9 door.

10 "FEMALE VOICE: I'm so sorry I did
11 that. I'm sorry.

12 "MALE VOICE: Then I stood up and
13 then you fucking clocked me.

14 "FEMALE VOICE: I -- I remember
15 hitting you as a response to the
16 door thing.")

17 THE WITNESS: That's exactly what I just told
18 her.

19 (Audio recording continues as follows:

20 "FEMALE VOICE: I'm really sorry
21 about hitting you with the door --
22 or hitting your head. I did not
23 mean to nor --

24 "MALE VOICE: You didn't not mean to
25 hit me in the head with the door,

1 but you meant to --

2 "FEMALE VOICE: I didn't --

3 "MALE VOICE: -- punch me in the
4 jaw.

5 "FEMALE VOICE: I meant to hit you
6 and I -- I did not do this thing
7 with the door. I do remember I did
8 mean to hit you.

9 "MALE VOICE: But that you didn't
10 mean?

11 "FEMALE VOICE: The door? No. God
12 no. I -- I --

13 "MALE VOICE: But punching me in the
14 jaw you did?

15 "FEMALE VOICE: I -- okay. I'm
16 sorry.")

17 BY MS. BERK:

18 Q So on the tape you tell Johnny Depp that you
19 did mean to hit him?

20 MR. HARDER: Objection. That's argumentative
21 and it misstates what the recording was.

22 THE WITNESS: And it also misrepresents that --
23 what actually happened, which is him trying to get into a
24 room I'm trying to keep him out of, and then he runs the
25 door over my toes trying to get into the room. I tried

1 to push him out of it, which is what the hit is that is
2 referred to. And Johnny, whenever he was hit or touched
3 at all, referred to it in these ways of punching or
4 clocked or whatever. And whether you discussed it with
5 him or not, the last thing you do in -- in talking to him
6 afterwards or trying to reconcile with him is to get into
7 what the definition of those words mean to him.

8 MR. HARDER: Just say what happened.

9 THE WITNESS: So I just never -- I never even
10 addressed it. If he was ever pushed, it was a clock --
11 he called it a cold-clock. I mean, he was just very
12 dramatic about everything about it.

13 BY MS. BERK:

14 Q Isn't it true, Ms. Heard, that in December of
15 2015, you punch Johnny Depp in the face with a closed
16 fist?

17 (Sotto voce discussion among respondent's
18 counsel off the record)

19 THE WITNESS: I hit -- I hit Johnny one time
20 when he -- sorry, I'll wait.

21 MR. HARDER: No. Answer the question. Please
22 stop whispering because it's distracting over here.

23 MS. GARVIS WRIGHT: It's your team.

24 THE WITNESS: No. I was referring to --

25 MR. HARDER: No. These two.

1 THE WITNESS: -- them actually.

2 MR. HARDER: I can't hear them. I hear them.

3 MS. GARVIS WRIGHT: I can't hear them.

4 MR. HARDER: So please answer the question.

5 BY MS. BERK:

6 Q Yes or no --

7 MR. HARDER: No.

8 BY MS. BERK:

9 Q -- did you ever punch Johnny Depp with a closed
10 fist in the history of your relationship with Johnny?

11 MR. HARDER: Answer it however you feel you
12 wish to.

13 THE WITNESS: One time, um, Johnny was hitting
14 me and he was hitting me hard and repeatedly and I was
15 screaming. Security walks in and they don't do anything
16 about it. And there -- he -- he -- he -- he -- he makes
17 this motion when Jerry Judge yells "Boss." Or Sean. I
18 can't remember who it was. And -- and my -- all we had
19 was a little bit of separation. And my sister runs down
20 the stairs. It's a -- we're on a landing in between two
21 flights of stairs.

22 MS. BERK: Ms. Heard, I must interrupt you --

23 MR. HARDER: You can't.

24 MS. BERK: -- because --

25 MR. HARDER: You can't --

1 MS. BERK: -- I've asked you a yes or a --

2 MR. HARDER: Then withdraw --

3 MS. BERK: -- no question.

4 MR. HARDER: Withdraw your question, then,
5 because she was answering.

6 BY MS. BERK:

7 Q Ms. Heard, prior to today's date, at any time,
8 has Johnny -- have you ever hit Johnny Depp?

9 MR. KOENIG: Objection. 352.

10 MR. HARDER: You've already asked and she's
11 already answered and you interrupted her.

12 BY MS. BERK:

13 Q Ms. Heard, have you ever hit Johnny Depp prior
14 to today?

15 MS. SPECTOR: 352.

16 MR. KOENIG: Objection. Vague as to time.

17 MS. KLEIN: Let her answer.

18 MR. HARDER: Everyone on this side of the room,
19 please.

20 MR. KOENIG: Objection. 352. It's not
21 relevant to the domestic violence proceeding.

22 MR. O'DONNELL: Overruled. You may answer.

23 MS. BERK: Thank you, Your Honor.

24 MR. HARDER: Answer it however you want to
25 including the way you were just giving --

1 MS. BERK: I'm asking for a yes or no answer.

2 THE WITNESS: He --

3 MR. HARDER: You don't have to answer it the
4 way she wants you to answer it.

5 THE WITNESS: He was about to push my sister
6 down the stairs. She was attempting to break us up. I'm
7 protective over my baby sister. When he laid hands on
8 her, I don't know what I did, but I know I jumped in
9 between the actions that I saw could lead to a fatal
10 injury to my sister. She was standing at the top of a
11 flight of stairs, and she has never hurt anyone in her
12 life and she does not deserve to be pushed down a flight
13 of stairs, and it looked like she was about to be. And I
14 would have done what anybody who has a child or a sister
15 would have done. I acted defensively in her life. I saw
16 her standing on top of a flight of stairs and trying to
17 interrupt a fight between him and I. I don't know what
18 part of my body I put in between me and him and her, but
19 I would have done anything, I would have done anything to
20 prevent her from being pushed down a flight of stairs.

21 BY MS. BERK:

22 Q Isn't it true, Ms. Heard, that prior to today
23 you've committed domestic violence against your sister,
24 Whitney Heard?

25 MR. HARDER: I'm going to object.

1 MS. SPECTOR: Same objections.

2 THE WITNESS: Well, when you live in such a
3 violent relationship as I have been in with someone who
4 is so much bigger than you and so much stronger than you,
5 and has no off button, you do the best you can to defend
6 yourself. And I don't know to what extent or to -- what
7 I would have -- that he could claim I have done damage on
8 him. I've done my best to defend myself. He is much
9 bigger than me. He's much stronger than me. And this
10 went on for so long before I ever even tried to defend
11 myself.

12 MS. BERK: Objection. Move to strike.
13 Nonresponsive.

14 Q Isn't --

15 MR. HARDER: It is responsive.

16 BY MS. BERK:

17 Q Isn't it a fact, Ms. Heard, that you, on
18 multiple occasion also prior to today --

19 MR. HARDER: Please lower your voice.

20 BY MS. BERK:

21 Q -- threw objects that --

22 MR. HARDER: Please lower your voice.

23 BY MS. BERK:

24 Q -- hit Mr. Depp, including a Mineral Spirits
25 can?

1 MR. KOENIG: Objection.

2 MR. HARDER: 352. It's irrelevant to these
3 proceedings. It's vague as to time. Vague and
4 ambiguous. Including a mineral -- are you -- it sounds
5 like a compound. Are you asking about several instances
6 or one instance? It's vague.

7 BY MS. BERK:

8 Q Have you ever intentionally thrown an object
9 that hit Mr. Depp prior to today?

10 MR. HARDER: Okay. Okay. I'm going to get
11 some new objections. 352, irrelevant to these
12 proceedings, vague and ambiguous, vague as to time,
13 harassing.

14 But go ahead and explain in any way you feel is
15 appropriate.

16 THE WITNESS: Um, what do you mean?

17 BY MS. BERK:

18 Q I mean have you ever thrown a -- an object
19 prior to today at Mr. Depp that hit him?

20 MR. HARDER: Same objections.

21 THE WITNESS: I don't know what has hit him. I
22 don't remember anything in particular about Mineral
23 Spirits.

24 Q Have you ever thrown a bottle or any other
25 object at Mr. Depp prior to today -- to today which hit

1 him?

2 MR. HARDER: Same objections.

3 THE WITNESS: I don't know.

4 BY MS. BERK:

5 Q Isn't it --

6 A I don't know what's hit him. I don't know.

7 Q Isn't it true, Ms. Heard --

8 MR. HARDER: You interrupted her.

9 THE WITNESS: I don't know what has hit him. I
10 don't know what has been thrown in self-defense because
11 it meant that -- or him being -- landing a punch at me.
12 I don't know also what I, um, will pass over when we have
13 these discussions afterwards and you're just seeking for
14 peace what you -- what you -- what I would have said or
15 not said just to move on with our lives and acquire for
16 ourselves some sort of peace. So a lot of times we'd
17 have these conversations afterwards where he would
18 articulate some of his experiences in -- and a lot of
19 which are delusional and I would -- some to which I would
20 agree and not --

21 MR. HARDER: Focus on the question. The
22 question was about throwing.

23 BY MS. BERK:

24 Q Have you ever, prior to today, thrown any
25 object at Mr. Depp whether or not it hit him?

1 A Um --

2 MR. KOENIG: Objection. Vague.

3 MS. SPECTOR: 352.

4 MR. HARDER: 352, irrelevant, vague, vague as
5 to time, calls for a narrative potentially.

6 MS. BERK: It calls for a yes or no answer.

7 THE WITNESS: I don't think it does.

8 BY MS. BERK:

9 Q Ms. Heard, have you, prior to today, ever
10 thrown any object at Mr. Depp whether or not it actually
11 hit him?

12 MR. HARDER: Same objections, and answer
13 however you wish.

14 THE WITNESS: I don't know. It depends on, I
15 guess, the context. I might have thrown something if it
16 meant that it was either because he was advancing on me
17 or because I had no other means to which I could protect
18 myself. He weighs well over 100 pounds more than me and
19 if someone like that is coming after you because they're
20 high or -- or fucked up -- excuse me -- high or drunk and
21 have taken a bag of ecstasy and done a bunch of cocaine
22 and are heavily intoxicated like in Australia or Japan --

23 BY MS. BERK:

24 Q Ms. --

25 A -- you do whatever you can to --

1 MS. GARVIS WRIGHT: Seriously?

2 THE WITNESS: -- defend yourself, and I don't
3 know if -- I -- I have no idea what else I could do.

4 BY MS. BERK:

5 Q So Is that yes or no?

6 A I don't know is what my answer was to you --

7 Q Okay.

8 A -- and I explained it the best I could.

9 Q Isn't it true, Ms. Depp -- I mean, Ms. Heard,
10 that in Australia in March of 2016, you threw a alcohol
11 bottle at Mr. Depp, and, in fact, when it smashed, you
12 cut off the end of his finger with the bottle that you
13 had thrown?

14 A That's a ridiculous accusation.

15 Q Isn't it a fact that you threw on May --
16 December 30th, 2005 -- -15, while on the island in Exuma,
17 a can of Mineral Spirits paint thinner and hit Mr. Depp
18 in the head?

19 MR. HARDER: Objections. 352, irrelevant to
20 these proceedings, vague, argumentative, harassing.

21 BY MS. BERK:

22 Q Isn't it true in -- yes?

23 MR. HARDER: If she doesn't want to have you
24 answer, then let her ask another question.

25 BY MS. BERK:

1 Q Are you --

2 A So sorry.

3 Q -- prepared to answer?

4 MR. HARDER: She was about to, but you started
5 asking another question.

6 MS. BERK: I apologize.

7 Q Ms. Depp -- Ms. Heard, are you about to answer?
8 Would you answer that question?

9 MS. SPECTOR: What's the question?

10 THE WITNESS: Can you please repeat your
11 question.

12 BY MS. BERK:

13 Q Did you throw on May 15 -- I'm sorry --
14 December 30, 2015 a can of paint thinner while on the
15 island of Exuma at Johnny Depp and hit him in the head?

16 MR. HARDER: 352, irrelevant to these
17 proceedings, vague, argumentative and harassing.

18 THE WITNESS: Um, on the island, I remember
19 this last time he came at me really bad, he came at me
20 really hard. And it started in the closet. And at one
21 point he had me by the neck in the closet and he -- he
22 said this -- I think it was like this -- "You don't think
23 I'll fucking do it this time? You don't think I'll
24 fucking do it?" He had his hands around my neck. He
25 wasn't squeezing very hard, he was -- but he was

1 squeezing. And I pick -- I -- I -- I -- I -- I -- I -- I
2 don't know if I -- I pushed him or I picked something up
3 to get away -- I -- I -- or at what point I picked
4 something up, but I have thrown something on the island
5 at him while I was running from the closet where this
6 started to the door to get out.

7 BY MS. BERK:

8 Q Isn't it true, Ms. Heard, that in front of two
9 different employees at the island you threw the paint
10 thinner and hit him in the head on December 15th?

11 MR. HARDER: 352, irrelevant, vague,
12 argumentative, harassing.

13 THE WITNESS: In front of whose employees?

14 MR. HARDER: And asked and answered.

15 THE WITNESS: Oh. That's true. I just
16 explained it, I guess.

17 MR. HARDER: Well, explain it again because --

18 MS. BERK: No. I'm not asking --

19 MR. HARDER: No, no, no, no.

20 MS. BERK: No. I'm not asking for anything
21 other than a yes or no.

22 Q Did you or did you not throw a can at Johnny
23 Depp on December 15, 2015?

24 MR. KOENIG: Objection.

25 MR. HARDER: Asked and --

1 THE WITNESS: No.

2 MR. HARDER: -- answer --

3 MS. BERK: No. Okay.

4 MR. HARDER: You have to wait for me to object.

5 THE WITNESS: I'm sorry. I --

6 MR. KOENIG: Objection. Argumentative.

7 MR. HARDER: Just wait.

8 BY MS. BERK:

9 Q In fact --

10 MR. HARDER: You have all the time in the
11 world. She doesn't. You do.

12 BY MS. BERK:

13 Q In fact --

14 THE WITNESS: I'm sorry.

15 MR. HARDER: Stop talking, please. I haven't
16 given my objections. Or are you withdrawing the
17 question?

18 MS. BERK: There is no question pending.

19 MR. HARDER: There was. I was about to object.
20 My objections are 352, irrelevant, harassing, vague,
21 vague as to time. And answer however you feel is
22 appropriate.

23 THE WITNESS: Okay. What incident are you
24 referring to?

25 MS. BERK: I'll move on, Ms. --

1 MR. HARDER: No. I want you to answer.

2 Can you please read back the question.

3 BY MS. BERK:

4 Q Ms. Heard --

5 MR. HARDER: Please read back the question.

6 MR. GARVIS WRIGHT: Withdraw the question.

7 MR. HARDER: Fine. Withdraw the question and
8 we'll move on.

9 Q Isn't it true that you've been previously
10 arrested for committing domestic violence against your
11 spouse?

12 MR. KOENIG: Objection. 352.

13 MR. HARDER: Irrelevant, harassing, has nothing
14 to do with this proceeding, it's argumentative.

15 Go ahead and explain how you want to

16 THE WITNESS: There was no domestic violence
17 within that relationship and I -- the State of Washington
18 where I was arrested immediately dropped the charges
19 because they knew the exact same thing that I just told
20 you, that no domestic violence ever occurred. And my ex
21 has stated such. In fact, it was so ridiculous, those
22 charges, it was verbal argument, it was misinterpreted,
23 misrepresented, and completely over -- overreacted upon
24 by two individuals in a power position, and as soon as
25 they found out -- as soon as they found out that we were

1 partners, which we were not going to be arrested for
2 before, as soon as they found out we were partners, the
3 male cop -- not this other woman who has later been
4 brought into the press -- this male cop put me in
5 handcuffs and -- and that's -- it -- there was no -- no
6 physical violence, no physical abuse, and zero, zero
7 domestic violence whatsoever between us. It was a
8 trumped up charge and it was dropped immediately for
9 being such.

10 BY MS. BERK:

11 Q Isn't it a fact, Ms. Heard, that in fact on
12 September 24th, 2009, you were arrested for domestic
13 violence committed against Tasya Van Ree?

14 MR. HARDER: Asked and answered. Isn't that
15 what you just talked about?

16 MR. KOENIG: Same objections.

17 THE WITNESS: Did I miss something?

18 BY MS. BERK:

19 Q Isn't it a fact, Ms. Heard, on September 14th
20 you were in fact taken to jail; it wasn't dropped
21 immediately?

22 MR. KOENIG: Same objections. Vague as to
23 "immediately."

24 MR. HARDER: Same objections.

25 BY MS. BERK:

1 Q Isn't it a fact, Ms. Heard, that you spent the
2 night in jail from September 14th to September 15th, 2009
3 as a result of your arrest for domestic violence?

4 MR. HARDER: Same objections.

5 MR. KOENIG: Same objection.

6 MR. HARDER: It's irrelevant.

7 BY MS. BERK:

8 Q Is that true?

9 MR. HARDER: 352. She's already answered what
10 happened.

11 BY MS. BERK:

12 Q Is that true?

13 MR. HARDER: Vague.

14 THE WITNESS: I already --

15 MR. HARDER: Argumentative and harassing. You
16 just want to get your harassment in. Go ahead.

17 MS. BERK: Let the record --

18 THE WITNESS: I just answered.

19 MS. BERK: -- reflect that Mr. Harder is
20 directing her not to answer.

21 Q Did you --

22 A I answered you --

23 Q -- spend the night in jail?

24 MR. HARDER: I never --

25 MS. SPECTOR: She answered.

1 MR. HARDER: I never said don't answer. I
2 never said that.

3 MR. GARVIS WRIGHT: The court reporter is about
4 to --

5 MR. HARDER: That's not my fault --

6 MR. GARVIS WRIGHT: Yes, it is.

7 MR. HARDER: -- because she keeps cutting me
8 off every time I say something.

9 MS. KLEIN: Why are you yelling?

10 MS. BERK: There is no need to yell,
11 Mr. Harder.

12 MR. HARDER: Well, I have to be heard.
13 Everybody's talking over me. You've got a whole wall of
14 lawyers over there who are talking over me.

15 MS. BERK: May I continue?

16 MR. KOENIG: Except for Hans.

17 MR. HARDER: Can I say something?

18 BY MS. BERK:

19 Q Ms. Heard -- Ms. Heard, isn't it a fact that
20 Tasya Van Ree on September 14th, 2009 claimed to the
21 police that you had hit her arm?

22 MR. HARDER: Same objections.

23 MS. BERK: No?

24 THE WITNESS: I don't know anything about this.

25 MR. HARDER: Answer how -- give a full answer,

1 please.

2 THE WITNESS: I don't know anything about the
3 claim that you just made about what Tasya said or did not
4 say. I can't possibly know that. I know nothing about
5 what you just said.

6 BY MS. BERK:

7 Q Isn't it a fact that on September 14th, you hit
8 Tasya Van Ree in her arm?

9 A No.

10 MR. KOENIG: Objection.

11 BY MS. BERK:

12 Q Isn't it a fact that on September 14th, you
13 broke the necklace off of Tasya Van Ree's neck?

14 MR. HARDER: 352.

15 BY MS. BERK:

16 Q The necklace?

17 MR. HARDER: Irrelevant to these proceedings,
18 argumentative, harassing.

19 BY MS. BERK:

20 Q Isn't it a fact that Tasya Van Ree reported to
21 the police that you had hit her arm?

22 MR. HARDER: 352, irrelevant, vague,
23 argumentative and harassing.

24 MR. KOENIG: And speculation.

25 BY MS. BERK:

1 Q Isn't it a fact, Ms. Heard --

2 A It's Heard still.

3 Q -- that you know very well that your spouse,
4 that your domestic partner, Tasya Van Ree, requested that
5 you be arrested for domestic violence?

6 A No.

7 MR. HARDER: Calls for -- you need to please
8 let me get my objections in. Okay? Please.

9 MS. BERK: Okay. At this time we would like to
10 take a break for 10 minutes.

11 MR. HARDER: No. I want to get my objections
12 in. Well, fine. She said no so we --

13 MS. BERK: May we go off the record?

14 MR. KOENIG: Hans, you got the time?

15 MR. HARDER: We're not going off the record.
16 We're not going off the record.

17 MS. BERK: We're taking a brief break.

18 MR. HARDER: We're not taking a brief break.

19 MS. GARVIS WRIGHT: Really. We had to take a
20 break every single time you wanted.

21 MR. HARDER: Because you made her cry. So
22 we're not taking a break.

23 MS. GARVIS WRIGHT: I actually keep --

24 MR. HARDER: We're going to keep running.

25 We're not --

1 STATE OF CALIFORNIA)
) ss
2 COUNTY OF LOS ANGELES)

3
4 I, PAMELA J. FELTEN, a Certified Shorthand
5 Reporter, do hereby certify:

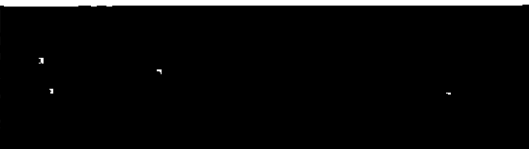
6 That prior to being examined, the witness in
7 the foregoing proceedings was by me duly sworn to
8 testify to the truth, the whole truth, and nothing
9 but the truth;

10 That said proceedings were taken before me at
11 the time and place therein set forth and were taken
12 down by me in shorthand and thereafter transcribed
13 into typewriting under my direction and supervision;

14 I further certify that I am neither counsel
15 for, nor related to, any party to said proceedings,
16 nor in anywise interested in the outcome thereof.

17 In witness whereof, I have hereunto subscribed
18 my name.

19
20 Dated: August 14, 2016

21 
22
23
24 PAMELA J. FELTEN
CSR No. 5189
25