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Clerk of the Circuit Court
of Fairfax County, VA

CONFIDENTIAL

Transcript of Christi Dembrowski

Date: February 22, 2022

Case: Depp, II -v- Heard

Planet Depos

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WORLDWIDE COURT REPORTING & LITIGATION TECHNOLOGY

1. VIRGINIA:

2. IN THE CIRCUIT COURT OF FAIRFAX COUNTY

3. - - - - - X

4. JOHN C. DEPP, II, :

5. Plaintiff and, : CIVIL ACTION NO.

6. Counter Defendant, : CL-2019-0002911

7. v. :

8. AMBER LAURA HEARD, :

9. Defendant and :

10. Counter Plaintiff. :

11. - - - - - X

12.

13.

14. *** CONFIDENTIAL ***

15. VIDEOTAPED DEPOSITION OF CHRISTI DEMBROWSKI

16. Conducted Virtually

17. February 22, 2022

18. 12:38 p.m. EST

19.

20. Job No.: 433437

21. Pages: 1-210

22. Reported By: KRISTI R. WEAVER, RPR

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1 Videotaped deposition of CHRISTI DEMBROWSKI,
2 conducted virtually.
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10 Pursuant to notice, before Kristi R. Weaver,
11 RPR, Notary Public in and for the Commonwealth of
12 Virginia.
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22

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By Mr. Treece 9

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E X H I B I T S

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1	P R O C E E D I N G S	12:37:34
2	THE VIDEOGRAPHER: Here begins disk number	12:37:34
3	one in the video deposition of Christi Dembrowski	12:37:36
4	in the matter of John C. Depp, II versus Amber	12:37:40
5	Laura Heard in the Fairfax County Circuit Court of	12:37:45
6	Virginia, Case Number CL-2019-0002911.	12:37:49
7	Today's date is February 22nd, 2022. Time	12:37:58
8	on the video monitor is 12:38 p.m. Eastern.	12:38:03
9	The videographer is Drew Halton,	12:38:07
10	representing Planet Depos.	12:38:09
11	All participants are attending remotely.	12:38:10
12	Would counsel please voice identify	12:38:12
13	themselves and state they represent.	12:38:14
14	MR. TREECE: Joshua Treece on behalf of	12:38:16
15	defendant and counter-claimant Amber Heard. And	12:38:20
16	with me today I have my cocounsel and colleague,	12:38:23
17	Ben Rottenborn, on behalf of Ms. Heard.	12:38:26
18	MS. VASQUEZ: Camille Vasquez of Brown	12:38:29
19	Rudnick on behalf of John C. Depp, II. And with	12:38:32
20	me I have Yarelyn Mena.	12:38:35
21	MS. HICKOX: And I'm Cindy Hickox on	12:38:38
22	behalf of the deponent, Christi Dembrowski.	12:38:40

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1	THE VIDEOGRAPHER: The court reporter is	12:38:43
2	Kristi Weaver, representing Planet Depos.	12:38:45
3	Would the reporter please swear in the	12:38:47
4	witness.	12:38:48
5	CHRISTI DEMBROWSKI, called as a witness,	12:38:48
6	having been first duly sworn, was examined and	12:38:48
7	testified as follows:	12:38:48
8	EXAMINATION	12:39:12
9	BY MR. TREECE:	12:39:12
10	Q Good morning, Ms. Dembrowski. As you	12:39:14
11	know, my name is Josh Treece. I represent Amber	12:39:17
12	Heard in this litigation.	12:39:20
13	I wanted to ask you first if you'll state	12:39:22
14	your full name and address for the record,	12:39:24
15	residential address.	12:39:28
16	A Christi Dembrowski. My address is 6529	12:39:29
17	Santa Rosa Road, Camarillo, California, 93012.	12:39:36
18	Q And what is your work address?	12:39:41
19	A Well, I'm working remotely.	12:39:45
20	Q Okay. So you're working from home?	12:39:47
21	A Yes.	12:39:49
22	Q All right. Now, have you had your	12:39:50

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1	deposition taken before?	12:39:52
2	A No.	12:39:56
3	Q In any other case, not just in connection	12:39:58
4	with this case.	12:40:00
5	A Oh, yes, once.	12:40:01
6	Q Okay. So you've been deposed. When were	12:40:02
7	you deposed?	12:40:04
8	A I don't recall. A few years ago. I don't	12:40:06
9	recall the dates.	12:40:08
10	Q Do you recall what that was in connection	12:40:09
11	with?	12:40:11
12	A Yes.	12:40:14
13	Q And what was that?	12:40:15
14	A It was in connection with, excuse me, a	12:40:17
15	different lawsuit for Bloom Hergott, I believe.	12:40:23
16	Q And just so I understand, are you saying	12:40:32
17	that you were deposed in connection with the	12:40:34
18	lawsuit that Johnny Depp filed against Bloom	12:40:36
19	Hergott?	12:40:42
20	A Yes.	12:40:42
21	Q And what was the nature of your testimony	12:40:46
22	generally, if you can recall? What were you asked	12:40:49

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1	about? What was the basis of your knowledge and	12:40:52
2	involvement?	12:40:55
3	MS. VASQUEZ: Objection; vague, compound.	12:40:56
4	MS. HICKOX: Join.	12:41:01
5	MS. VASQUEZ: Unintelligible.	12:41:02
6	BY MR. TREECE:	12:41:05
7	Q Let me ask you, Ms. Dembrowski, do you	12:41:05
8	recall if there was a central focus of topics for	12:41:08
9	your deposition in that case?	12:41:12
10	MS. VASQUEZ: Same objections.	12:41:15
11	MS. HICKOX: Join.	12:41:17
12	THE WITNESS: I answer?	12:41:24
13	MS. HICKOX: You can answer if you	12:41:25
14	understand the question.	12:41:27
15	THE WITNESS: I sort of -- I'm not sure if	12:41:28
16	I understand the question, but here's what I would	12:41:30
17	answer: It was -- for me it was mostly to talk	12:41:32
18	about a list of projects and the involvement of	12:41:36
19	the legal team, Bloom Hergott.	12:41:42
20	BY MR. TREECE:	12:41:46
21	Q Okay. All right. Well, we don't need to	12:41:46
22	go too far down that road.	12:41:49

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1	You understand that you're here today	12:41:50
2	pursuant to a subpoena; is that correct?	12:41:52
3	A Yes.	12:41:54
4	Q And I'm going to move an exhibit over into	12:41:55
5	the Chat box, and I can also share that on the	12:41:58
6	screen.	12:42:03
7	(Exhibit 1 was marked for identification	12:42:03
8	and is attached to the transcript.)	12:42:03
9	BY MR. TREECE:	12:42:17
10	Q Ms. Dembrowski, are you able to view the	12:42:17
11	screen?	12:42:19
12	A Yes.	12:42:22
13	Q Do you recognize this document?	12:42:23
14	And I don't know if you have the ability	12:42:27
15	to download it on your end on the witness side. I	12:42:29
16	put it in a Chat box so you have access to it.	12:42:32
17	Do you recognize this as your subpoena for	12:42:35
18	today's appearance?	12:42:38
19	A I believe so.	12:42:43
20	Q Okay. And I can go back to the top.	12:42:44
21	All right.	12:42:47
22	A Yes.	12:42:50

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1	Q All right. And let me ask you, what have	12:42:52
2	you done to prepare for today's deposition?	12:42:54
3	MS. VASQUEZ: Objection; assumes facts,	12:42:57
4	vague.	12:42:59
5	BY MR. TREECE:	12:43:03
6	Q You can answer.	12:43:03
7	A Okay. Sorry.	12:43:05
8	Mainly to make sure that I understood --	12:43:07
9	since I've never done a remote, you know,	12:43:11
10	deposition before so that I understood the process	12:43:16
11	and to make sure that my internet was working,	12:43:18
12	because I was having trouble with that.	12:43:20
13	MS. HICKOX: I'm just going to advise,	12:43:22
14	Christi, make sure to listen to his question.	12:43:24
15	He's asking what you did to prepare, if anything.	12:43:26
16	THE WITNESS: I didn't really --	12:43:33
17	BY MR. TREECE:	12:43:36
18	Q Let me ask you -- let me ask you this:	12:43:36
19	Did you review any documents in preparation for	12:43:38
20	today's deposition?	12:43:41
21	A No.	12:43:43
22	Q Have you reviewed the Complaint or	12:43:44

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1	Counterclaim in this lawsuit?	12:43:49
2	MS. VASQUEZ: Objection; asked and	12:43:52
3	answered.	12:43:54
4	THE WITNESS: I haven't really reviewed	12:43:58
5	documents.	12:44:02
6	BY MR. TREECE:	12:44:03
7	Q All right. And I wanted to ask you, you	12:44:03
8	have siblings, correct?	12:44:08
9	A Yes.	12:44:09
10	Q Who are your siblings?	12:44:10
11	A Excuse me.	12:44:13
12	I have a brother, Danny; a sister, Debbie;	12:44:14
13	and my younger brother, Johnny.	12:44:18
14	Q Do you have children?	12:44:22
15	A Yes.	12:44:24
16	Q Who are your children?	12:44:25
17	A I have four daughters.	12:44:29
18	Q And who are they?	12:44:33
19	MS. HICKOX: Objection; relevance,	12:44:35
20	privacy. I don't understand why you need to know	12:44:38
21	the names of these -- of her children.	12:44:41
22	MS. VASQUEZ: Join.	12:44:43

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1	BY MR. TREECE:	12:44:44
2	Q You still need to answer.	12:44:44
3	MS. VASQUEZ: Actually -- well, I'll let	12:44:47
4	Ms. Hickox instruct her witness not to answer	12:44:49
5	on -- in California, which is where this	12:44:53
6	deposition is, the rules are governed by, privacy	12:44:55
7	is a valid objection; and she could instruct her	12:44:58
8	witness not to answer.	12:45:01
9	MS. HICKOX: And I will do so. I'm going	12:45:02
10	to instruct Ms. Dembrowski not to answer on	12:45:04
11	privacy grounds.	12:45:06
12	BY MR. TREECE:	12:45:07
13	Q Are your children under the age of 18?	12:45:07
14	A No.	12:45:10
15	Q So all of your children are adults?	12:45:12
16	A Yes.	12:45:14
17	Q What is your current occupation?	12:45:23
18	A I work at a production company.	12:45:28
19	Q What's the name of the production company?	12:45:32
20	A Infinitum Nihil.	12:45:34
21	Q And is that a production company owned by	12:45:37
22	your brother, Johnny Depp?	12:45:40

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1	A Yes.	12:45:42
2	MS. VASQUEZ: Objection.	12:45:42
3	Sorry, Ms. Dembrowski. I may be objecting	12:45:44
4	to Mr. Treece's questions, as your counsel may be	12:45:48
5	as well. So if you'd just give us a few	12:45:52
6	seconds --	12:45:54
7	THE WITNESS: Okay.	12:45:54
8	MS. VASQUEZ: -- to lodge our objections,	12:45:55
9	I'm sure the court reporter and Mr. Treece would	12:45:57
10	appreciate that.	12:45:59
11	THE WITNESS: Okay. Sorry.	12:46:00
12	MS. VASQUEZ: I'll interpose a late	12:46:02
13	objection of calls for a legal conclusion and	12:46:04
14	calls for speculation.	12:46:07
15	MS. HICKOX: And I'll join.	12:46:09
16	BY MR. TREECE:	12:46:11
17	Q Is the production company Infinitum Nihil	12:46:11
18	controlled by your brother, Johnny Depp?	12:46:15
19	MS. VASQUEZ: Same objections.	12:46:17
20	MS. HICKOX: Join.	12:46:19
21	THE WITNESS: I don't understand	12:46:22
22	controlled, so...	12:46:23

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1.	BY MR. TREECE:	12:46:25
2	Q Does he call the shots with respect to	12:46:25
3	what Infinitum Nihil needs to be doing?	12:46:30
4	MS. VASQUEZ: Objection.	12:46:33
5	MS. HICKOX: Same objections.	12:46:34
6	MS. VASQUEZ: Yeah, same objections. And	12:46:35
7	I'm going to add vague and ambiguous.	12:46:37
8	Ms. Dembrowski, if you understand the	12:46:42
9	question, I guess you can answer it.	12:46:43
10	THE WITNESS: I think we have a -- there's	12:46:46
11	a team of us that work -- that we all work	12:46:51
12	together and make decisions.	12:46:54
13	BY MR. TREECE:	12:46:56
14	Q And -- and does the team consider Johnny	12:46:57
15	Depp the boss?	12:46:59
16	MS. VASQUEZ: Same objections.	12:47:02
17	MS. HICKOX: Join. Also calls for	12:47:03
18	speculation.	12:47:06
19	THE WITNESS: He would be considered, you	12:47:10
20	know, I suppose -- I suppose the boss. But, you	12:47:15
21	know, not necessarily a boss, more of a -- you	12:47:19
22	know, he's -- he's had -- you know, he's -- he's	12:47:25

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1	head of the company, I suppose.	12:47:29
2	BY MR. TREECE:	12:47:30
3	Q And do you consider Johnny Depp the boss	12:47:30
4	of the company?	12:47:32
5	MS. VASQUEZ: Objection; relevance.	12:47:36
6	BY MR. TREECE:	12:47:39
7	Q And I'll -- I'll refrain that.	12:47:39
8	Do you consider Johnny Depp the head of	12:47:41
9	the company?	12:47:42
10	MS. VASQUEZ: Calls for a legal	12:47:44
11	conclusion, vague, and relevance.	12:47:46
12	MS. HICKOX: Join.	12:47:48
13	THE WITNESS: I've always considered him	12:47:54
14	as -- as, you know, not necessarily the boss; but	12:48:00
15	he was, you know, the key player for all of us.	12:48:03
16	He's -- you know, because we all work together,	12:48:07
17	so...	12:48:11
18	BY MR. TREECE:	12:48:11
19	Q It's his company, is it not?	12:48:11
20	MS. VASQUEZ: Objection; argumentative,	12:48:13
21	asked and answered, calls for a legal conclusion,	12:48:16
22	and vague.	12:48:20

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1	MS. HICKOX: Join.	12:48:20
2	THE WITNESS: I -- I suppose it is.	12:48:24
3	BY MR. TREECE:	12:48:28
4	Q And would you -- let me ask you this: Do	12:48:28
5	you work for any other company other than	12:48:32
6	Infinitum Nihil?	12:48:35
7	A No.	12:48:38
8	Q Do you have any other sources of income	12:48:39
9	other than from Infinitum Nihil?	12:48:41
10	A No. Job wise, no.	12:48:48
11	Q And you would agree with me that your	12:48:53
12	financial interests then are aligned with	12:48:56
13	Infinitum Nihil's financial interests, correct?	12:48:59
14	MS. VASQUEZ: Objection; argumentative,	12:49:01
15	vague.	12:49:05
16	MS. HICKOX: Join.	12:49:12
17	THE WITNESS: I'm sorry. I'm not really	12:49:15
18	understanding exactly the question.	12:49:20
19	BY MR. TREECE:	12:49:21
20	Q Okay. Well, let me ask it this way: You	12:49:22
21	would agree with me that your financial interests	12:49:24
22	are aligned with your brother's financial	12:49:26

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1	interests because he owns the company that you	12:49:28
2	work for and from which you get paid, correct?	12:49:30
3	MS. VASQUEZ: Objection; compound,	12:49:33
4	argumentative, asked and answered.	12:49:35
5	MS. HICKOX: Join. And also assumes	12:49:39
6	facts.	12:49:41
7	THE WITNESS: I would say I'm employed.	12:49:45
8	BY MR. TREECE:	12:49:48
9	Q In other words, you're employed by your	12:49:49
10	brother through a company, correct?	12:49:53
11	MS. VASQUEZ: Objection; calls for a legal	12:49:56
12	conclusion, vague, and assumes facts, and	12:49:57
13	argumentative.	12:50:00
14	MS. HICKOX: Join.	12:50:01
15	THE WITNESS: I'm employed at a company	12:50:04
16	that my brother owns.	12:50:07
17	BY MR. TREECE:	12:50:13
18	Q Are you married?	12:50:13
19	A Yes.	12:50:16
20	Q What is your husband's name?	12:50:17
21	A Brian.	12:50:21
22	Q Brian Dembrowski?	12:50:25

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1	A Uh-huh, yes.	12:50:27
2	Q And have you had a relationship with	12:50:30
3	Keenan Wyatt?	12:50:33
4	MS. VASQUEZ: Objection; relevance,	12:50:35
5	privacy --	12:50:37
6	MS. HICKOX: Same objections. And also --	12:50:39
7	MS. VASQUEZ: -- and --	12:50:41
8	MS. HICKOX: Sorry. Didn't mean to cut	12:50:41
9	you off.	12:50:43
10	MS. VASQUEZ: I'm sorry. I'm sorry,	12:50:44
11	Ms. Hickox.	12:50:45
12	-- vague.	12:50:46
13	MS. HICKOX: Same objections; privacy.	12:50:46
14	I'm going to instruct her not to answer.	12:50:49
15	MR. TREECE: All right. We'll address	12:50:51
16	that as we move along. I think that's relevant	12:50:52
17	and the witness needs to answer that question.	12:50:55
18	So -- but we'll cross that bridge when we get to	12:50:58
19	it.	12:51:01
20	BY MR. TREECE:	12:51:02
21	Q Ms. Dembrowski, what is your educational	12:51:03
22	background?	12:51:08

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1	A	High school.	12:51:08
2	Q	Do you have any formal education in	12:51:10
3		production?	12:51:14
4	A	As in college or school, no.	12:51:17
5	Q	And what is your role at Infinitum Nihil?	12:51:21
6		What's your official title?	12:51:24
7	A	President.	12:51:26
8	Q	And what are your duties as president?	12:51:28
9	A	It's oversee -- you know, with others	12:51:32
10		oversee projects, ideas, development, then going	12:51:42
11		into production.	12:51:49
12	Q	And what type of projects have you worked	12:51:51
13		on so I can get an understanding for what you're	12:51:53
14		talking about when you say projects?	12:51:57
15	MS. VASQUEZ:	Objection; vague.	12:51:59
16	THE WITNESS:	I've worked on many projects	12:52:07
17		over the many number of years, whether it's a --	12:52:09
18		you know, developing a -- a book into, you know, a	12:52:13
19		script for a film. There's many.	12:52:15
20	BY MR. TREECE:		12:52:21
21	Q	Are all of those projects projects that	12:52:21
22		involve your brother, Mr. Depp, in a talent	12:52:23

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1	capacity; that is, as an actor, performer,	12:52:28
2	something along those lines?	12:52:31
3	MS. VASQUEZ: Objection; assumes facts,	12:52:32
4	vague, compound.	12:52:36
5	MS. HICKOX: Join.	12:52:38
6	THE WITNESS: Not necessarily, no. They	12:52:45
7	were projects that -- you know, they were	12:52:47
8	developed. If there was something in it -- a role	12:52:49
9	in it for him that -- that he liked that worked,	12:52:50
10	then that was fine. But otherwise it was for, you	12:52:54
11	know, other talent as well, not --	12:52:58
12	BY MR. TREECE:	12:53:01
13	Q Okay.	12:53:01
14	A -- specifically for him.	12:53:01
15	Q Okay, thank you.	12:53:01
16	What's Infinitum Nihil's relationship with	12:53:02
17	Disney?	12:53:04
18	MS. VASQUEZ: Objection; assumes facts.	12:53:06
19	MS. HICKOX: Join.	12:53:08
20	MS. VASQUEZ: Vague.	12:53:10
21	BY MR. TREECE:	12:53:12
22	Q Well, let me ask you this: Does Infinitum	12:53:12

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1	Nihil have a relationship with Disney?	12:53:14
2	A At the -- at the moment?	12:53:17
3	MS. VASQUEZ: I'm so sorry,	12:53:20
4	Ms. Dembrowski.	12:53:22
5	Objection; vague.	12:53:22
6	THE WITNESS: I don't understand. In what	12:53:28
7	capacity are you asking?	12:53:31
8	BY MR. TREECE:	12:53:33
9	Q Did Infinitum Nihil have a Walt Disney	12:53:40
10	studio deal through May of 2017, do you know?	12:53:42
11	MS. VASQUEZ: Objection; vague, calls for	12:53:45
12	a legal conclusion, lack of foundation, assumes	12:53:46
13	facts.	12:53:49
14	MS. HICKOX: Join.	12:53:49
15	MS. VASQUEZ: And calls for speculation.	12:53:51
16	THE WITNESS: Infinitum had an -- a	12:53:56
17	first-look deal with Disney.	12:54:00
18	BY MR. TREECE:	12:54:04
19	Q And what is the first-look deal you're	12:54:05
20	referring to?	12:54:07
21	A A first-look deal is when you take	12:54:10
22	potential projects to the studio and they have the	12:54:13

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1	first opportunity to get involved in the project	12:54:18
2	or we're able to take it elsewhere.	12:54:22
3	Q And on what projects would that refer to?	12:54:25
4	Is that a specific project or a multitude of	12:54:28
5	projects?	12:54:31
6	MS. VASQUEZ: Objection; calls for a legal	12:54:31
7	conclusion, vague, and compound.	12:54:33
8	MS. HICKOX: Join.	12:54:37
9	THE WITNESS: It would -- it would -- it	12:54:41
10	would not be just a specific project. It would be	12:54:42
11	projects that we were interested in developing.	12:54:45
12	BY MR. TREECE:	12:54:50
13	Q Do you recall how long Infinitum, I think	12:54:50
14	is how you pronounce it, Nihil had a first-look	12:54:55
15	deal with Disney?	12:54:59
16	MS. VASQUEZ: Objection; calls for a legal	12:55:04
17	conclusion, vague, calls for speculation.	12:55:06
18	MS. HICKOX: Join.	12:55:10
19	THE WITNESS: I don't recall the exact	12:55:17
20	number of years. I believe it -- I believe it to	12:55:18
21	be maybe -- I don't recall the exact number of	12:55:23
22	years. Maybe around four. I don't know.	12:55:27

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1	BY MR. TREECE:	12:55:34
2	Q All right. Ms. Dembrowski, can you	12:55:34
3	describe to me your relationship with Mr. Depp	12:55:37
4	during the time he was dating Amber Heard?	12:55:43
5	MS. HICKOX: Objection; vague.	12:55:51
6	MS. VASQUEZ: Objection.	12:55:52
7	Join.	12:55:57
8	THE WITNESS: That's a -- that's a very	12:56:01
9	broad question. He's my brother and we work	12:56:04
10	together as well.	12:56:08
11	BY MR. TREECE:	12:56:09
12	Q All right. And how would you describe	12:56:09
13	your relationship? Did you-all get along well?	12:56:11
14	That -- that type of thing is what I'm looking	12:56:14
15	for. So you can describe that for me in whatever	12:56:16
16	way you think accurately summarizes your	12:56:19
17	relationship with your brother, Johnny, at the	12:56:21
18	time he and Amber were dating.	12:56:24
19	MS. VASQUEZ: Objection --	12:56:27
20	MS. HICKOX: Objection; vague. Also calls	12:56:28
21	for a narrative.	12:56:30
22	MS. VASQUEZ: Objection; vague, compound,	12:56:31

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1	frankly unintelligible.	12:56:35.
2	THE WITNESS: I think we had a good	12:56:42
3	relationship, you know.	12:56:44
4	BY MR. TREECE:	12:56:46
5	Q Were you aware of any issues that your	12:56:46
6	brother had during the time he was dating	12:56:51
7	Ms. Heard -- strike that. I'll refrain.	12:56:54
8	During the time Johnny was dating	12:56:59
9	Ms. Heard, were you aware that he was using drugs	12:57:02
10	or alcohol?	12:57:05
11	MS. VASQUEZ: Objection; compound, vague,	12:57:07
12	calls for speculation, assumes facts, lack of	12:57:09
13	foundation.	12:57:13
14	MS. HICKOX: Join.	12:57:14
15	THE WITNESS: I -- I -- I understood, yes,	12:57:21
16	that he had been, you know.	12:57:28
17	BY MR. TREECE:	12:57:34.
18	Q Did you ever conclude that your brother	12:57:34
19	had an issue with drugs or alcohol?	12:57:37
20	MS. VASQUEZ: Objection; vague as to time,	12:57:41
21	calls for speculation, assumes facts, lack of	12:57:45
22	foundation.	12:57:49

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1	MS. HICKOX: Join.	12:57:50
2	THE WITNESS: At one point, yes.	12:57:57
3	BY MR. TREECE:	12:58:00
4	Q What point did you conclude that he had	12:58:00
5	problems with drugs or alcohol?	12:58:03
6	MS. VASQUEZ: Same objections.	12:58:05
7	MS. HICKOX: Join.	12:58:08
8	MS. VASQUEZ: Also calls for an expert	12:58:12
9	opinion.	12:58:14
10	THE WITNESS: I don't recall exactly; but	12:58:24
11	what I do recall was there was a -- you know, one	12:58:31
12	prescription medication that he was -- had been	12:58:36
13	taking for quite some time.	12:58:44
14	BY MR. TREECE:	12:58:45
15	Q What prescription medication is that?	12:58:45
16	A I --	12:58:48
17	MS. VASQUEZ: Objection; calls for	12:58:49
18	speculation, calls for a legal conclusion.	12:58:50
19	MS. HICKOX: Join.	12:58:53
20	THE WITNESS: I don't know. I'm sorry. I	12:58:54
21	don't recall the exact.	12:58:56
22	BY MR. TREECE:	12:58:58

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1	Q Did you ever become aware that Mr. Depp	12:58:58
2	was using cocaine?	12:59:02
3	MS. VASQUEZ: Objection; vague as to time,	12:59:05
4	calls for speculation, assumes facts.	12:59:08
5	MS. HICKOX: Join.	12:59:11
6	MS. VASQUEZ: Lack of foundation.	12:59:12
7	THE WITNESS: I had never seen him use	12:59:17
8	cocaine ever, so...	12:59:20
9	BY MR. TREECE:	12:59:24
10	Q What I'm going to do is I'm going to show	12:59:24
11	you an exhibit that's marked as Exhibit 3. We're	12:59:26
12	going to come back to 2 in a moment.	12:59:31
13	(Exhibit 3 was marked for identification	12:59:38
14	and is attached to the transcript.)	12:59:45
15	MS. HICKOX: Counsel, do you have a	12:59:45
16	preference that we either download it or that	12:59:47
17	you -- we view it through the share screen	12:59:50
18	function?	12:59:51
19	MR. TREECE: Downloading it would enable	12:59:52
20	her to review it on her own, I believe. So if	12:59:54
21	that would be preferable, that would be okay by	12:59:56
22	me. I can also show it on the screen.	12:59:58

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1	MS. HICKOX: Okay. Christi, do you see in	13:00:00
2	the notes -- the Chat function the ability to	13:00:03
3	download the document?	13:00:05
4	THE WITNESS: I see in the Chat --	13:00:09
5	MS. HICKOX: Yeah. If you click on Chat,	13:00:12
6	you should see something called CD Exhibit 3. Do	13:00:13
7	you see that?	13:00:18
8	THE WITNESS: Yes.	13:00:19
9	MS. HICKOX: Okay. And if you click on	13:00:20
10	it, you should be able to download it. That way	13:00:21
11	you can review things natively on your computer.	13:00:24
12	THE WITNESS: Okay.	13:00:26
13	MS. HICKOX: Mr. Treece may want to direct	13:00:27
14	you to certain pages or messages, but just know	13:00:30
15	that you can review the entire document if -- if	13:00:32
16	you would like to do so and would need to do so	13:00:35
17	before responding to any questions.	13:00:37
18	THE WITNESS: Okay. So I just click on	13:00:39
19	download?	13:00:41
20	MS. HICKOX: Yes.	13:00:42
21	BY MR. TREECE:	13:00:45
22	Q And, Ms. Dembrowski, let me know when	13:00:45

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1	you've been able to download and open that.	13:00:46
2	A Okay, I've -- I think I've done it. I	13:01:05
3	think I've downloaded it.	13:01:09
4	Q All right. Thank you.	13:01:10
5	Can you take a moment to review ALH 17940,	13:01:11
6	that's the Bates number in the bottom right,	13:01:17
7	through 17943.	13:01:20
8	A I'm sorry?	13:01:25
9	Q Can you take a moment to review the Bates	13:01:26
10	numbered range 17940 to 17943 and let me know when	13:01:30
11	you've finished.	13:01:36
12	A I'm assuming you're meaning what I just	13:01:43
13	downloaded, review it?	13:01:45
14	Q Correct. If you scroll down on what you	13:01:47
15	just downloaded --	13:01:49
16	A Uh-huh.	13:01:50
17	Q -- at the bottom right of each page there	13:01:50
18	will be a -- a page number, for --	13:01:52
19	A Oh.	13:01:53
20	Q -- lack of a better term. We call them	13:01:54
21	Bates numbers, but it's just a page number	13:01:57
22	reference. And it's 17940 to 43. It's the color	13:01:59

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1	versions of text messages.	13:02:05
2	A Okay.	13:02:07
3	MS. HICKOX: It's just the first four	13:02:08
4	pages.	13:02:10
5	BY MR. TREECE:	13:04:23
6	Q I'm going to walk through this. I don't	13:04:23
7	know if it helps you. I want you to get a -- you	13:04:25
8	know, an understanding of what's in here, but	13:04:27
9	we'll go through generally.	13:04:28
10	My question for you first is, do you	13:04:30
11	recall this text chain? Do you recall this text	13:04:33
12	chain?	13:04:42
13	MS. HICKOX: One second.	13:04:46
14	Camille, I see that you are still muted,	13:04:48
15	but I saw that you may be trying to say something.	13:04:50
16	MS. VASQUEZ: Thanks.	13:04:53
17	Objection; vague and compound.	13:04:54
18	MS. HICKOX: Join.	13:04:59
19	THE WITNESS: Can I -- can I finish	13:05:03
20	reading it?	13:05:05
21	MS. HICKOX: Yes.	13:05:06
22	BY MR. TREECE:	13:05:07

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1 Q Certainly. 13:05:07

2 A I don't -- I'm sorry. I read it. 13:05:37

3 Q Do you recall this text chain? 13:05:40

4 A I don't know that I specifically recall. 13:05:42

5 Q All right. Well, we'll -- we'll walk 13:05:48

6 through this and see if I can refresh your 13:05:50

7 recollection. 13:05:52

R; IR 8 Is this a -- a text chain between you and 13:05:52

9 Amber Heard on March 22nd, 2013? 13:05:56

10 A Yes. 13:06:01

11 MS. VASQUEZ: Objection -- 13:06:01

12 THE WITNESS: Sorry. 13:06:02

13 MS. VASQUEZ: Objection; vague, ambiguous, 13:06:04

14 calls for a legal conclusion, lack of foundation, 13:06:06

15 assumes facts. 13:06:08

16 MS. HICKOX: Join. 13:06:11

17 BY MR. TREECE: 13:06:12

18 Q And the -- the first text in the chain, do 13:06:12

19 you see the text from Amber Heard that says, I'm 13:06:15

20 sorry, I don't know what to do? 13:06:18

21 MS. VASQUEZ: Same objections. 13:06:20

22 THE WITNESS: Yes. 13:06:21

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1	BY MR. TREECE:	13:06:22
2	Q And then you respond with two texts there,	13:06:22
3	the seconds of which says, It's sad and I'm sorry	13:06:27
4	you guys are going through this. Do you see that?	13:06:31
5	A Yes.	13:06:35
6	Q Do you recall what that refers to?	13:06:36
7	MS. VASQUEZ: Objection; calls for	13:06:40
8	speculation.	13:06:41
9	THE WITNESS: No.	13:06:47
10	BY MR. TREECE:	13:06:48
11	Q All right. Are you aware that Keith	13:06:48
12	Richards was -- there was a Keith Richards	13:06:51
13	documentary on or around this March 2013 time	13:06:55
14	frame?	13:07:00
15	MS. VASQUEZ: Objection; assumes facts,	13:07:01
16	lack of foundation.	13:07:03
17	MS. HICKOX: Join.	13:07:05
18	THE WITNESS: I'm aware of the Keith	13:07:08
19	Richards documentary.	13:07:09
20	BY MR. TREECE:	13:07:11
21	Q Are you aware of any issues that arose in	13:07:11
22	connection with the Keith Richards documentary	13:07:13

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1	that you and Amber discussed?	13:07:16
2	MS. VASQUEZ: Objection; assumes facts,	13:07:19
3	vague, ambiguous, compound, calls for speculation.	13:07:22
4	MS. HICKOX: Join.	13:07:30
5	THE WITNESS: I'm sorry. Could you ask	13:07:34
6	again?	13:07:36
7	BY MR. TREECE:	13:07:37
8	Q Yeah. Why don't we do this.	13:07:37
R; VA; 9 H; SP; AF; 10 FSPK	All right. If you'll take a look at the	13:07:38
11	second blue box on 17940, do you see where Amber	13:07:41
12	says, I don't know what you could do. He's upset	13:07:44
13	and there's nothing I can do to reason with him.	13:07:48
14	He's another person when he's like this. He's	13:07:50
15	fueled up on booze and coke. Do you see that?	13:07:52
16	A Yes.	13:07:57
17	Q Do you remember Ms. Heard talking to you	13:07:58
18	about Mr. Depp being another person when he's	13:08:00
19	fueled up on booze and coke?	13:08:05
20	MS. VASQUEZ: Objection; vague, calls for	13:08:07
21	hearsay, calls for speculation, compound, assumes	13:08:09
22	facts.	13:08:13
	MS. HICKOX: Join.	13:08:14

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R; VA; H; SP; AF; FSPK	1	THE WITNESS: I remember her saying these	13:08:20
	2	things, yes.	13:08:21
	3	BY MR. TREECE:	13:08:23
	4	Q And did you talk to her about -- about	13:08:23
	5	those things?	13:08:27
	6	MS. VASQUEZ: Objection; vague, compound,	13:08:28
	7	calls for hearsay.	13:08:30
	8	MS. HICKOX: Join. Vague as to "those	13:08:31
	9	things."	13:08:34
	10	THE WITNESS: We spoke occasionally when	13:08:41
	11	she would bring it up, yes.	13:08:42
	12	BY MR. TREECE:	13:08:45
	13	Q Were you aware that Johnny and Amber would	13:08:45
	14	get into, you know, fights, arguments, and then	13:08:50
	15	Amber might reach out to you to try to address	13:08:56
	16	those with her brother -- with your brother,	13:08:59
	17	excuse me?	13:09:01
O	18	MS. VASQUEZ: Objection; compound, vague,	13:09:02
	19	ambiguous, lack of foundation, assumes facts,	13:09:05
	20	calls for speculation, calls for hearsay.	13:09:08
	21	MS. HICKOX: Join.	13:09:12
	22	THE WITNESS: I don't know that -- I mean,	13:09:22

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1	it was -- it always seemed a little dramatic, you	13:09:31
2	know what I mean, so -- with Amber. So, you know,	13:09:35
3	I don't -- I don't know how often she reached out	13:09:41
4	or whatever, you know, during that time.	13:09:44
5	BY MR. TREECE:	13:09:48
6	Q All right. Well, let's -- let's get back	13:09:48
7	to the text chain then. She goes on to say, And	13:09:50
8	he believes we are fighting. No one is fighting	13:09:54
9	him. He's just gone. And this is the fourth time	13:09:57
10	this week. Do you see that?	13:09:58
11	A Yes.	13:10:01
12	Q And she's referring to the fourth time	13:10:02
13	this week that he's been fueled up on booze and	13:10:04
14	coke, correct?	13:10:07
15	MS. VASQUEZ: Objection --	13:10:08
16	MS. HICKOX: Objection.	13:10:09
17	MS. VASQUEZ: -- calls for spec -- yeah,	13:10:10
18	calls for speculation, assumes facts, calls for	13:10:11
19	hearsay, lack of foundation.	13:10:15
20	MS. HICKOX: Join.	13:10:17
21	THE WITNESS: I don't know what she's	13:10:23
22	referring to, to be honest.	13:10:25

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1	BY MR. TREECE:	13:10:26
2	Q At the time you received this text do you	13:10:27
3	recall discussing this issue with her?	13:10:29
4	MS. VASQUEZ: Objection; vague and	13:10:34
5	ambiguous, calls for hearsay, calls for	13:10:35
6	speculation.	13:10:38
7	MS. HICKOX: Join.	13:10:40
8	THE WITNESS: At the time I received this	13:10:53
9	text is what you asked me?	13:10:55
10	BY MR. TREECE:	13:10:58
11	Q Or -- at or around the time you received	13:10:58
12	this text did you talk to Ms. Heard about the	13:11:00
13	issues she outlines in the box that we're	13:11:03
14	reviewing?	13:11:06
15	MS. VASQUEZ: Objection; vague and	13:11:07
16	ambiguous, compound, calls for hearsay, calls for	13:11:08
17	speculation, assumes facts, lack of foundation.	13:11:11
18	MS. HICKOX: Join.	13:11:14
19	THE WITNESS: I don't recall if I talked	13:11:15
20	to her.	13:11:17
21	BY MR. TREECE:	13:11:17
22	Q All right. And I think we'll get to that	13:11:18

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1	as we move along.	13:11:20
2	Ms. Heard goes on to tell you, The only	13:11:22
3	time we have this kind of fight is when that combo	13:11:24
4	is in action. Do you see that?	13:11:28
5	A Yes.	13:11:31
6	Q And she's letting you know that the only	13:11:32
7	time they really fight is when Johnny is consuming	13:11:34
8	drugs or alcohol; is that right?	13:11:40
9	MS. VASQUEZ: Objection; calls for	13:11:42
10	speculation. How is this witness supposed to know	13:11:44
11	what Amber is thinking? Assumes facts, lack of	13:11:47
12	foundation, calls for hearsay.	13:11:51
13	MR. TREECE: You can keep your speaking	13:11:54
14	objections to yourself. You can lodge the	13:11:55
15	specific objections, but please refrain from	13:11:57
16	speaking objections.	13:11:59
17	MS. HICKOX: And I'll join in those	13:12:01
18	objections.	13:12:03
19	THE WITNESS: Okay. I'm sorry. Would you	13:12:05
20	repeat your question again?	13:12:07
21	BY MR. TREECE:	13:12:09
22	Q So Amber is telling you that the only time	13:12:09

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1	they really fight is when Johnny is under the	13:12:12
2	influence of drugs or alcohol, correct?	13:12:16
O 3	MS. VASQUEZ: Objection; calls for	13:12:19
4	speculation, calls for hearsay, and assumes facts,	13:12:19
5	lack of foundation.	13:12:23
6	(Ms. Zellner joined the deposition.)	13:12:24
7	MS. HICKOX: Join. And also want to add	13:12:25
8	it potentially violates best evidence rule. It's,	13:12:28
9	you know, purporting to establish the contents of	13:12:31
10	the documents.	13:12:34
11	BY MR. TREECE:	13:12:36
12	Q You still need to answer.	13:12:36
13	A Yeah, I will.	13:12:37
14	I think personally she liked to use that a	13:12:38
15	lot. She just would say it.	13:12:53
16	Q So she would tell you a lot that the only	13:12:56
17	time that they have fights is when Johnny's under	13:12:58
18	the influence of drugs and alcohol?	13:13:01
O 19	MS. VASQUEZ: Objection; misstates prior	13:13:03
20	testimony, calls for hearsay, calls for	13:13:05
21	speculation, assumes facts, lack of foundation.	13:13:08
22	MS. HICKOX: Join.	13:13:13

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1 THE WITNESS: It's not that she would tell 13:13:18
2 me a lot. It was -- it was -- it felt like 13:13:20
3 that's, you know -- was basically, you know, her 13:13:29
4 reasoning; but it wasn't necessarily so. 13:13:33

5 BY MR. TREECE: 13:13:37

6 Q And do you have any personal knowledge to 13:13:37
7 rebut her assertion that the only time we have -- 13:13:41
8 kind of fight is when that combo is in action, 13:13:45
9 referring to drugs and alcohol? 13:13:48

O 10 MS. VASQUEZ: Objection; argumentative, 13:13:49
11 calls for speculation, assumes facts, compound, 13:13:53
12 calls for hearsay. 13:13:59

13 MS. HICKOX: Join. 13:14:01

14 THE WITNESS: Well, you reference that 13:14:06
15 kind of fight, so I don't know what that means. 13:14:08
16 But, excuse me, I do know that, you know, there 13:14:11
17 were, you know, disagreements that had nothing to 13:14:17
18 do with that, so... 13:14:20

19 BY MR. TREECE: 13:14:24

20 Q And what were those? 13:14:25

O 21 MS. VASQUEZ: Objection; vague, ambiguous. 13:14:27

22 MS. HICKOX: Join. 13:14:30

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O	1	MS. VASQUEZ: Calls for hearsay.	13:14:31
	2	THE WITNESS: I don't recall all of those.	13:14:34
	3	BY MR. TREECE:	13:14:37
R; H; IR	4	Q All right. And then she goes on to say,	13:14:38
	5	He finds something to jump on and then uses it --	13:14:44
	6	uses it as an excuse to dose himself up, which is	13:14:48
	7	where he is now, wasted. Do you see that?	13:14:51
	8	A Yes.	13:14:56
	9	Q And then she goes on to say, I just want	13:14:59
	10	to help. I just want to have him back. Do you	13:15:03
	11	see that?	13:15:06
	12	A Yes.	13:15:08
	13	Q And she conveyed to you that she was	13:15:09
	14	having issues with Johnny during this week where	13:15:12
	15	he was on drugs and alcohol and -- and they were	13:15:17
	16	having a fight because of his use of drugs and	13:15:23
	17	alcohol, correct?	13:15:25
	18	MS. VASQUEZ: Objection; misstates the	13:15:26
	19	document, calls for hearsay, assumes facts, lack	13:15:31
	20	of foundation, violates the best evidence rule.	13:15:34
	21	MS. HICKOX: Join.	13:15:40
	22	MS. VASQUEZ: It's also compound and vague	13:15:46

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1 and ambiguous.

13:15:48

2 THE WITNESS: Very vague.

13:15:52

3 I don't know that she states to me what

13:15:56

4 their reason for an argument was, so...

13:16:00

5 BY MR. TREECE:

13:16:04

R; H;
IR

6 Q All right. If you'll turn to page 17941,

13:16:04

7 that's the next page, do you see the text from you

13:16:10

8 to Ms. Heard that says, I'm not sure of the volume

13:16:19

9 or when some is likely to wear off? Do you see

13:16:23

10 that?

13:16:27

11 A Yes.

13:16:28

12 Q What does that refer to?

13:16:29

13 MS. VASQUEZ: Objection; calls for

13:16:31

14 speculation, calls for hearsay.

13:16:33

15 MS. HICKOX: Join.

13:16:36

16 THE WITNESS: I'm not exactly sure. The

13:16:45

17 volume of the argument.

13:16:49

18 BY MR. TREECE:

13:16:53

19 Q Does that refer to the coke and alcohol?

13:16:53

20 MS. VASQUEZ: Objection; calls for

13:16:58

21 speculation, asked and answered, vague and

13:16:59

22 ambiguous, calls for hearsay.

13:17:04

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1	MS. HICKOX: And I'm just -- I join in	13:17:06
2	those objections. And I'm just going to remind	13:17:09
3	Ms. Dembrowski to not guess. If you know, you	13:17:10
4	know. If you don't know, you don't know.	13:17:14
5	THE WITNESS: Right. Well, that's --	13:17:16
6	that's what I'm saying. I don't -- I don't know.	13:17:17
7	BY MR. TREECE:	13:17:19
R; AR; 8 AF	Q This is a text that you sent, correct?	13:17:19
9	A Yeah.	13:17:21
10	Q This is a text that --	13:17:22
11	MS. VASQUEZ: Objection. Mr. Treece, I'm	13:17:24
12	sorry, I need to lodge an objection.	13:17:25
13	Argumentative, assumes facts, calls for legal	13:17:28
14	conclusion.	13:17:31
15	BY MR. TREECE:	13:17:34
16	Q And just so it's clear on the record, this	13:17:34
17	is a sent that you -- that is a text that you sent	13:17:36
18	to Amber, correct?	13:17:39
19	MS. VASQUEZ: Same objections.	13:17:40
20	THE WITNESS: Yes.	13:17:44
21	BY MR. TREECE:	13:17:45
22	Q And this is a text that you sent her in	13:17:45

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1	response to her telling you that Johnny was fueled	13:17:47
2	up on booze and coke, correct?	13:17:50
3	MS. VASQUEZ: Objection; assumes facts,	13:17:52
4	lack of foundation, calls for hearsay, calls for	13:17:54
5	speculation, violates the best evidence rule,	13:17:57
6	document speaks for itself.	13:18:00
7	MS. HICKOX: Join.	13:18:04
8	THE WITNESS: This is a text that actually	13:18:09
9	speaks about their arguing, so...	13:18:12
10	BY MR. TREECE:	13:18:18
11	Q Do you know if this text refers to trying	13:18:18
12	to get Johnny to the Keith Richards documentary	13:18:21
13	set and having difficulties because he's fueled	13:18:25
14	up -- fueled up on coke and booze?	13:18:28
15	MS. VASQUEZ: Objection; compound, assumes	13:18:31
16	facts, calls for speculation, vague and ambiguous,	13:18:33
17	unintelligible, calls for hearsay.	13:18:37
18	THE WITNESS: I don't recall the timing.	13:18:43
19	BY MR. TREECE:	13:18:47
20	Q Do you have any recollection of what this	13:18:47
21	refers to?	13:18:49
22	MS. VASQUEZ: Objection; asked and	13:18:50

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1	answered..	13:18:52
2	THE WITNESS: I honestly don't recall the	13:18:58
3	timing.	13:19:00
4	BY MR. TREECE:	13:19:11
5	Q And then do you see in this text chain	13:19:12
6	there's a number of texts on the page we were just	13:19:14
7	on at the bottom saying he's slowly getting	13:19:17
8	moving; and then later, about three hours after	13:19:20
9	the first text is sent, it says, We're finally on	13:19:23
10	our way? Do you see that?	13:19:27
11	A Yes.	13:19:31
12	Q And then do you see on 17942 the text from	13:19:32
13	you saying, Was just hoping all calm for you guys?	13:19:41
14	A Yes.	13:19:50
15	Q Do you know what you were referring to	13:19:51
16	there?	13:19:54
17	MS. VASQUEZ: Objection; calls for	13:19:54
18	speculation, assumes facts.	13:19:56
19	MS. HICKOX: Join.	13:19:58
20	THE WITNESS: I believe I was hoping that	13:20:02
21	they -- their argument was over.	13:20:04
22	BY MR. TREECE:	13:20:07

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1	Q And do you know what precipitated that	13:20:08
2	argument?	13:20:10
3	MS. VASQUEZ: Objection; calls for	13:20:11
4	speculation, calls for hearsay.	13:20:12
5	MS. HICKOX: Join.	13:20:14
6	THE WITNESS: No.	13:20:17
7	BY MR. TREECE:	13:20:20
8	Q Do you recall having any discussion with	13:20:20
9	your brother about an argument he had with Amber	13:20:23
10	on or around March 22nd, 2013?	13:20:27
11	MS. VASQUEZ: Objection; calls for	13:20:31
12	hearsay, vague and ambiguous.	13:20:33
13	MS. HICKOX: Join.	13:20:35
14	MS. VASQUEZ: Assumes facts.	13:20:36
15	THE WITNESS: I don't recall.	13:20:39
16	BY MR. TREECE:	13:20:43
17	Q If you'll turn to 17943.	13:20:43
18	Let me ask you this before we focus on	13:20:57
19	17943. Before March 22nd, 2013 do you recall	13:20:59
20	having any discussions with your brother about his	13:21:05
21	need to get sober?	13:21:08
22	MS. VASQUEZ: Objection; assumes facts,	13:21:11

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1	lack of foundation, calls for hearsay.	13:21:13
2	THE WITNESS: I don't recall.	13:21:18
3	BY MR. TREECE:	13:21:23
4	Q And if you take a look at 17943, do you	13:21:23
5	see at the top where it says, We can get back to	13:21:27
6	the good moments together?	13:21:29
7	A Yes.	13:21:32
8	Q Do you know if that refers to you and	13:21:33
9	Amber working to help Johnny get sober?	13:21:35
10	MS. VASQUEZ: Objection; calls for	13:21:38
11	speculation, assumes facts, lack of foundation.	13:21:40
12	MS. HICKOX: Join.	13:21:43
13	THE WITNESS: I don't recall.	13:21:44
14	BY MR. TREECE:	13:21:54
15	Q Do you recall having any discussions prior	13:21:55
16	to March 22nd, 2013 with Ms. Heard about Amber and	13:21:56
17	Johnny fighting?	13:22:04
18	MS. VASQUEZ: Objection; assumes facts,	13:22:06
19	lack of foundation, calls for hearsay, vague and	13:22:10
20	ambiguous.	13:22:13
21	MS. HICKOX: Join.	13:22:19
22	THE WITNESS: Do I recall conversations	13:22:22

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1	with her about them fighting?	13:22:24
2	BY MR. TREECE:	13:22:27
3	Q Correct, before March 22nd, 2013.	13:22:27
4	A I -- I don't recall.	13:22:32
5	Q Do you recall any discussions with your	13:22:34
6	brother, Johnny, prior to March 22nd, 2013 about	13:22:36
7	Amber and Johnny fighting?	13:22:42
8	MS. VASQUEZ: Objection; asked and	13:22:45
9	answered, assumes facts, lack of foundation, calls	13:22:47
10	for hearsay, vague.	13:22:50
11	MS. HICKOX: Join.	13:22:52
12	THE WITNESS: I don't recall.	13:22:55
13	MS. HICKOX: Mr. Treece, I don't mean to	13:22:58
14	interrupt your flow or anything, but I'd like to	13:22:59
15	get a break sometime that's convenient for you.	13:23:02
16	MR. TREECE: Okay.	13:23:05
17	BY MR. TREECE:	13:23:12
18	Q Do you ever recall having a conversation	13:23:12
19	with your brother, Johnny, about fights he was	13:23:14
20	having with Amber Heard?	13:23:17
21	MS. VASQUEZ: Objection; vague and	13:23:19
22	ambiguous, assumes facts, lack of foundation,	13:23:21

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1	calls for hearsay, asked and answered.	13:23:23
2	MS. HICKOX: Join.	13:23:26
3	THE WITNESS: Ever over the course of	13:23:31
4	their time together?	13:23:33
5	BY MR. TREECE:	13:23:35
6	Q Correct.	13:23:35
7	A We occasionally had conversations about	13:23:44
8	arguments, you know --	13:23:49
9	Q What's the --	13:23:53
10	A -- drama.	13:23:54
11	Q What's the first such conversation that	13:23:55
12	you can recall? In other words, you referenced	13:23:57
13	conversations about arguments, and I want to know	13:24:00
14	the first one that you can recall.	13:24:03
15	A I --	13:24:06
16	MS. VASQUEZ: Objection; calls for a	13:24:06
17	narrative, compound, vague and ambiguous, assumes	13:24:07
18	facts.	13:24:11
19	MS. HICKOX: Join.	13:24:11
20	THE WITNESS: I don't recall.	13:24:13
21	BY MR. TREECE:	13:24:16
22	Q Do you recall --	13:24:16

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1	A This --	13:24:17
2	Q I'm sorry. I didn't mean to interrupt	13:24:17
3	you. Go ahead.	13:24:20
4	A No, I don't recall specifics. I don't	13:24:21
5	recall the first one. I don't recall specifics	13:24:23
6	right at the moment.	13:24:25
7	Q Do you recall any discussion with	13:24:26
8	specifics that you had with your brother about any	13:24:29
9	arguments or fights that he and Amber Heard may	13:24:33
10	have been in?	13:24:36
11	MS. VASQUEZ: Objection; calls for	13:24:37
12	speculation, calls for hearsay, assumes facts,	13:24:39
13	lack of foundation.	13:24:41
14	MS. HICKOX: Join. And it's also	13:24:43
15	compound.	13:24:44
16	THE WITNESS: I don't know specifically	13:24:54
17	that I recall -- I mean, we had conversations	13:24:56
18	brother and sister where, you know, I felt it sad,	13:24:59
19	you know, that -- that if -- there seemed to be	13:25:02
20	constant, you know, drama or arguments.	13:25:09
21	BY MR. TREECE:	13:25:14
22	Q And what I'm trying to do is I'm trying to	13:25:15

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1	get your recollection of those conversations you	13:25:17
2	might have had with your brother about those	13:25:19
3	issues he may have had with Amber. And do you --	13:25:22
4	what do you -- and I'm trying to understand from	13:25:27
5	you what specifics you might recall. Can you	13:25:29
6	provide me with any specifics of any conversation	13:25:32
7	that you recall with your brother about arguments	13:25:35
8	that he had with Ms. Heard?	13:25:38
9	MS. VASQUEZ: Objection; compound, calls	13:25:39
10	for a narrative, asked and answered, assumes	13:25:42
11	facts, lack of foundation, calls for hearsay.	13:25:46
12	MS. HICKOX: Join.	13:25:48
13	THE WITNESS: No, I don't -- I don't	13:25:54
14	recall specifics.	13:25:56
15	BY MR. TREECE:	13:26:01
16	Q Same question with respect to Ms. Heard.	13:26:01
17	Do you recall specifics of any conversation you	13:26:03
18	had with Ms. Heard relating to any argument that	13:26:06
19	she may have had with Johnny?	13:26:09
20	MS. VASQUEZ: Same objections.	13:26:12
21	MS. HICKOX: Join.	13:26:14
22	THE WITNESS: I don't recall all specifics	13:26:19

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1	of conversations from a long time ago.	13:26:21
2	BY MR. TREECE:	13:26:25
3	Q Right. And what I'm trying to get from	13:26:25
4	you is I would imagine there are certain events	13:26:27
5	and issues between Amber and Johnny that would	13:26:29
6	stand out in your mind, and I'm trying to	13:26:32
7	understand if you had any discussions with either	13:26:34
8	of them about any of those particular events that	13:26:37
9	might stand out in your mind. Does that help you?	13:26:40
10	A Yeah, I suppose.	13:26:48
11	Q All right. So -- so with that in mind, is	13:26:49
12	there any specific, you know, event or events that	13:26:52
13	you recall being involved with either with	13:26:57
14	discussions with Amber or discussions with Johnny	13:27:00
15	to try to figure out what happened or how you may	13:27:03
16	help?	13:27:05
17	MS. VASQUEZ: Objection; assumes facts,	13:27:07
18	calls for a narrative, compound, calls for	13:27:10
19	hearsay, vague and ambiguous, calls for hearsay.	13:27:15
20	MS. HICKOX: Join.	13:27:21
21	THE WITNESS: Again, you know, I don't	13:27:25
22	really recall specific specifics necessarily, you	13:27:31

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1	know.	13:27:44
2	BY MR. TREECE:	13:27:44
3	Q All right. Well, we'll -- we'll walk	13:27:44
4	through some events as we move along, and maybe	13:27:47
5	that will help you with your recollection.	13:27:49
6	MR. TREECE: All right. And we can go	13:27:53
7	ahead and take a quick break. Let's go off the	13:27:54
8	record.	13:27:57
9	THE VIDEOGRAPHER: Off record, 1:27.	13:27:58
10	(A recess was taken.)	13:28:00
11	THE VIDEOGRAPHER: On record, 1:47.	13:47:47
12	BY MR. TREECE:	13:47:50
13	Q Ms. Dembrowski, I'm going to show you what	13:47:51
14	we'll mark as Exhibit 2.	13:47:54
15	(Exhibit 2 was marked for identification	13:47:57
16	and is attached to the transcript.)	13:47:57
17	BY MR. TREECE:	13:47:57
18	Q And I just loaded that to the Chat, so let	13:48:02
19	me know when you're able to open that.	13:48:04
20	A Okay.	13:48:07
21	Q And this is a small document, it's only	13:48:26
22	two pages, so I can actually just do it on the	13:48:28

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1	screen if you'd prefer.	13:48:30
2	A I have it.	13:48:37
3	Q All right. Ms. Dembrowski, I'll represent	13:48:38
4	to you that this is a payment ledger that was	13:48:39
5	produced by Depp's counsel in this case; and I	13:48:41
6	wanted to look at some of the entries. Do you see	13:48:46
7	at the top right where it says Balance and it says	13:48:48
8	the date of 12-31-15 for the fiscal year?	13:48:52
9	A Yes.	13:48:56
10	Q And I wanted to talk about some of these	13:48:57
11	entries and -- and inquire as to your knowledge as	13:49:01
12	to them. Do you see where it says Danny Depp and	13:49:03
13	Nazee Mahnaz Depp? Do you see that?	13:49:06
14	A Yes.	13:49:14
15	Q Who are they?	13:49:15
16	MS. VASQUEZ: Calls for speculation.	13:49:18
17	BY MR. TREECE:	13:49:21
18	Q Do you know them?	13:49:21
19	A Danny's my brother.	13:49:22
20	Q And who is Nazee?	13:49:25
21	A His wife.	13:49:29
22	Q And are they employed by Infinitum Nihil?	13:49:34

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1	MS. VASQUEZ: Objection; calls for	13:49:41
2	speculation.	13:49:43
3	THE WITNESS: No.	13:49:45
4	BY MR. TREECE:	13:49:47
5	Q Do you see off to the right there's a	13:49:48
6	payment of \$71,000 for 2015? Do you know -- do	13:49:49
7	you have any knowledge with respect to that	13:49:55
8	payment and what it could refer to?	13:49:57
9	MS. VASQUEZ: Objection; assumes facts,	13:50:00
10	calls for speculation, lack of foundation.	13:50:02
11	MS. HICKOX: Join.	13:50:06
12	THE WITNESS: No.	13:50:07
13	BY MR. TREECE:	13:50:12
14	Q All right. If you'll take a look at the	13:50:12
15	second page of this exhibit, do you see the	13:50:14
16	reference to Loan and it has your name there and	13:50:17
17	it's roughly three and a half million dollars? Do	13:50:21
18	you see that?	13:50:32
19	A Yeah, I see that.	13:50:32
20	Q Do you know what that refers to?	13:50:34
21	MS. VASQUEZ: Objection; calls for	13:50:36
22	speculation, calls for a legal conclusion, assumes	13:50:37

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1	facts, lack of foundation.	13:50:39
2	MS. HICKOX: Join.	13:50:41
3	THE WITNESS: I know it -- it refers to a	13:50:50
4	ledger is all I know.	13:50:52
5	BY MR. TREECE:	13:50:54
6	Q Did -- did you ever get a loan from your	13:50:55
7	brother or any of his companies?	13:50:57
8	MS. VASQUEZ: Objection; vague and	13:51:02
9	ambiguous, assumes facts, lack of foundation.	13:51:04
10	MS. HICKOX: Join.	13:51:09
11	MS. VASQUEZ: Relevance.	13:51:10
12	THE WITNESS: No, I never asked for a loan	13:51:12
13	from my brother.	13:51:14
14	BY MR. TREECE:	13:51:15
15	Q And that's a little bit different than the	13:51:15
16	question I asked.	13:51:17
17	A Oh, I'm sorry.	13:51:18
18	Q I'm not asking if you asked for a loan.	13:51:19
19	Did you ever get a loan from your brother or any	13:51:21
20	of his companies?	13:51:23
21	MS. VASQUEZ: Objection; calls for a legal	13:51:24
22	conclusion, assumes facts, lack of foundation,	13:51:26

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1	vague and ambiguous.	13:51:32
2	MS. HICKOX: Join.	13:51:34
3	THE WITNESS: No.	13:51:35
4	BY MR. TREECE:	13:51:37
5	Q So is it fair to say you don't know what	13:51:37
6	this entry refers to?	13:51:39
7	MS. VASQUEZ: Objection; asked and	13:51:41
8	answered.	13:51:42
9	THE WITNESS: No.	13:51:49
10	BY MR. TREECE:	13:51:51
11	Q All right. And then if you'll take a look	13:51:51
12	down below, do you see there's a loan, it's got	13:51:54
13	Infinitum and then there's another loan Infinitum	13:51:57
14	Nihil Records and then another Infinitum Nihil	13:52:03
15	loan, and I'm scrolling and putting the hand over	13:52:06
16	the references I'm referring to, Infinitum Nihil	13:52:10
17	Music, LLC loan, Infinitum Nihil Media, LLC loan?	13:52:14
18	Are you familiar with any of the loans with	13:52:18
19	respect to Infinitum or any subsidiary that are	13:52:20
20	referenced in this document?	13:52:26
21	MS. VASQUEZ: Objection; assumes facts,	13:52:27
22	lack of foundation, violates the best evidence	13:52:30

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1	rule, calls for speculation, and compound, vague	13:52:34
2	and ambiguous.	13:52:37
3	MS. HICKOX: Join.	13:52:39
4	THE WITNESS: No, I'm not familiar with	13:52:43
5	them specifically, no.	13:52:45
6	BY MR. TREECE:	13:52:49
7	Q How much are you paid in your position at	13:52:49
8	Infinitum -- Infinitum Nihil?	13:52:54
9	MS. VASQUEZ: Sorry, Mr. Treece. The	13:52:57
10	court in Virginia has already ruled that that is	13:52:59
11	confidential, private, and that it's not relevant.	13:53:02
12	So we're not going to allow Ms. Dembrowski to	13:53:08
13	answer that question.	13:53:11
14	MS. HICKOX: Based on what Ms. Vasquez	13:53:13
15	said, I'll instruct Ms. Dembrowski not to respond.	13:53:16
16	MR. TREECE: And I'll take your word for	13:53:20
17	that, and we'll take that up later if there's any	13:53:21
18	issue with that.	13:53:24
19	BY MR. TREECE:	13:53:25
20	Q All right. Ms. Dembrowski, Johnny's your	13:53:26
21	younger brother, correct?	13:53:31
22	A Yes.	13:53:33

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1	Q And do you feel protective over him?	13:53:34
O 2	MS. VASQUEZ: Objection; vague and	13:53:37
3	ambiguous.	13:53:39
4	MS. HICKOX: Join.	13:53:40
5	MS. VASQUEZ: Argumentative.	13:53:41
6	THE WITNESS: I think as a human being I	13:53:46
7	feel protective over all my family, my children,	13:53:48
8	my siblings, my -- all my family.	13:53:52
9	BY MR. TREECE:	13:53:55
10	Q And that would include, obviously, your	13:53:56
11	brother, Johnny, correct?	13:53:58
O 12	MS. VASQUEZ: Objection; asked and	13:53:59
13	answered, argumentative.	13:54:00
14	THE WITNESS: Yes.	13:54:04
15	BY MR. TREECE:	13:54:06
16	Q Is -- are those protective feelings	13:54:06
17	affecting your ability to recall events or testify	13:54:09
18	fully and truthfully today?	13:54:14
O 19	MS. VASQUEZ: Objection; argumentative,	13:54:16
20	harassing, vague and ambiguous, misstates her	13:54:18
21	prior testimony.	13:54:28
22	BY MR. TREECE:	13:54:28

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1	Q You can answer, Ms. Dembrowski.	13:54:29
2	A No.	13:54:31
3	Q All right. I'm going to show you what is	13:54:33
4	marked as Exhibit 4.	13:54:38
5	(Exhibit 4 was marked for identification	13:54:40
6	and is attached to the transcript.)	13:55:03
7	BY MR. TREECE:	13:55:03
8	Q And I'm going to share the screen.	13:55:03
9	MS. HICKOX: And, Christi, I recommend	13:55:22
10	downloading the native .pdf on the Chat function	13:55:25
11	and just reviewing the -- the entire thread.	13:55:28
12	THE WITNESS: Okay. I don't see it on the	13:55:32
13	Chat.	13:55:33
14	Okay, there it is. Exhibit 4?	13:55:34
15	BY MR. TREECE:	13:55:36
16	Q Correct.	13:55:36
17	And I'm going to walk you through	13:58:23
18	Exhibit 4. If you'll take a look at the first	13:58:26
19	text message at the top, is this a text message	13:58:29
20	between you and Amber Heard on or around	13:58:33
21	March 3rd, 2014?	13:58:36
22	MS. VASQUEZ: Objection; calls for a legal	13:58:38

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1	conclusion, assumes facts, lack of foundation.	13:58:42
2	THE WITNESS: I'm sorry. I'm still	13:58:45
3	reading it.	13:58:47
4	BY MR. TREECE:	13:58:47
5	Q And I'm starting at the beginning, so I'm	13:58:47
6	asking if this first -- and you can read as we get	13:58:50
7	through. I'm asking if this first text is a text	13:58:53
8	between you and -- and Amber Heard on March 3rd,	13:58:56
9	2014.	13:59:01
10	MS. VASQUEZ: Sorry, Mr. Treece, but the	13:59:01
11	witness is entitled to read the entire document,	13:59:04
12	just like your client did at length during her	13:59:06
13	deposition.	13:59:10
14	So, Ms. Dembrowski, feel free to read the	13:59:10
15	entire document before you answer Mr. Treece's	13:59:13
16	questions.	13:59:16
17	THE WITNESS: Thank you.	13:59:17
18	BY MR. TREECE:	13:59:18
19	Q And I'm not -- and, Ms. Dembrowski, just	13:59:18
20	so you know, I'm not trying to preclude you from	13:59:20
21	reviewing it. I'm actually going to review the	13:59:23
22	whole thing with you. I'm trying to, you know,	13:59:25

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1	efficiently review this. And I understand	13:59:28
2	they're, you know, probably trying to -- strike	13:59:31
3	that.	13:59:33
4	So what I want to ask is, is this first	13:59:33
5	text that you -- a text that you received from	13:59:36
6	Amber on February 3rd, 2014?	13:59:39
7	MS. VASQUEZ: Objection; calls for a legal	13:59:43
8	conclusion, assumes facts, lack of foundation,	13:59:44
9	calls for speculation.	13:59:47
10	THE WITNESS: What I would like to do is	13:59:49
11	continue to read this so that I can --	13:59:51
12	BY MR. TREECE:	13:59:55
13	Q Do you need to read -- well, that's fine.	13:59:56
14	You can read all of it.	13:59:58
15	A Thank you.	13:59:59
16	Okay, I read it.	14:00:42
17	Q All right. Now, the -- the first text	14:00:43
18	that we were looking at, is this a text that you	14:00:46
19	received from Amber on February 3rd, 2014?	14:00:49
20	MS. VASQUEZ: Objection; calls for a legal	14:00:54
21	conclusion, assumes facts, lack of foundation,	14:00:57
22	calls for speculation.	14:01:00

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1	MR. TREECE: Camille, I'll give you a	14:01:05
2	running objection to all of my questions for those	14:01:06
3	objections you just lodged if you would like. I	14:01:08
4	think that would be more efficient.	14:01:10
5	MS. VASQUEZ: I wish it was that simple,	14:01:12
6	Mr. Treece.	14:01:14
7	MR. TREECE: It is that simple. I'll give	14:01:14
8	you -- I'll give you a running objection.	14:01:17
9	MS. VASQUEZ: Well, it depends on your	14:01:19
10	question, but we'll see how it goes.	14:01:20
11	MR. TREECE: I'll give you a running	14:01:22
12	objection to all of my questions. You can have	14:01:24
13	that -- you can have that running objection to all	14:01:27
14	of my questions.	14:01:29
15	MS. VASQUEZ: It's not going to be that	14:01:30
16	simple, unfortunately. This is potential trial	14:01:32
17	testimony.	14:01:36
18	MR. TREECE: So you're --	14:01:36
19	MS. VASQUEZ: This is potentially trial --	14:01:36
20	Mr. Treece, this is potentially trial testimony.	14:01:37
21	As you know, I have to lodge every objection to	14:01:40
22	your questions as we go. So if we get to a point	14:01:42

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1 where I think a running objection or a set of 14:01:47
2 running objections would be helpful, fine. But 14:01:49
3 the way you're phrasing your questions, I have to 14:01:52
4 lodge them. 14:01:55

5 MR. TREECE: We can take that up later if 14:01:58
6 needed. 14:02:00

7 BY MR. TREECE: 14:02:00

8 Q All right. So do you recall my question? 14:02:00

9 A You want to repeat the question? 14:02:05

R; H; 10 Q Yes. So -- well, this is a text that you 14:02:08
IR 11 received from Amber on February 3rd, 2014, 14:02:11
12 correct? 14:02:14

13 MS. VASQUEZ: Same objections. 14:02:15

R; H; 14 THE WITNESS: Yes. 14:02:17
IR

15 BY MR. TREECE: 14:02:18

R; H; 16 Q And she's telling you that she needs your 14:02:18
IR 17 help, correct? 14:02:20

18 MS. VASQUEZ: Objection; calls for 14:02:23
19 hearsay. 14:02:24

R; H; 20 THE WITNESS: Yes. 14:02:27
IR

21 BY MR. TREECE: 14:02:29

R; H; 22 Q And she lets you know that -- that Johnny 14:02:29
IR

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R; H; IR	1	is on a bender with Marilyn Manson; isn't that	14:02:33
	2	right?	14:02:36
	3	MS. VASQUEZ: Objection; calls for	14:02:36
	4	hearsay.	14:02:37
R; H; IR	5	THE WITNESS: That is what she says.	14:02:41
	6	BY MR. TREECE:	14:02:43
	7	Q Right. And she says, Once again believes	14:02:43
	8	it's about me or us fighting, even though that's	14:02:46
	9	what we were fighting. I don't know what to do.	14:02:49
	10	Do you see that?	14:02:51
	11	A Yes.	14:02:53
	12	Q And so she's reaching out to you so that	14:02:54
	13	you can intervene potentially in some way to help,	14:02:57
	14	correct?	14:03:01
	15	MS. VASQUEZ: Objection; calls for	14:03:01
	16	speculation.	14:03:02
	17	MS. HICKOX: Join. Lacks foundation.	14:03:05
	18	THE WITNESS: She's reaching out to me	14:03:10
	19	to -- to talk about it. It appears that she says	14:03:12
	20	can you help, yes.	14:03:17
	21	BY MR. TREECE:	14:03:18
R; H; IR	22	Q Right. And then she tells you she loves	14:03:18

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R; H; 1	him so much but he's going to hurt himself and	14:03:20
IR;		
MS; 2	take Amber and Johnny as a couple down; isn't that	14:03:23
AR; AF 3	right?	14:03:26
4	MS. VASQUEZ: Objection; calls for	14:03:27
5	hearsay, misstates the document.	14:03:29
6	MS. HICKOX: Join.	14:03:34
R; H, 7	THE WITNESS: That's what she writes.	14:03:39
IR,		
MS,		
AR, AF 8	BY MR. TREECE:	14:03:40
R; H, 9	Q And then she says, I can't do anything to	14:03:41
IR, MS,		
AR, AF 10	avoid how crazy he gets when he's like this. I	14:03:43
11	think he's at Marilyn's show continuing the rage	14:03:47
12	and coke booze binge. Do you see that?	14:03:51
13	MS. VASQUEZ: Objection; misstates the	14:03:53
14	state -- the text message, calls for hearsay.	14:03:55
15	MS. HICKOX: Join.	14:03:59
R; H, 16	THE WITNESS: Yes.	14:04:02
IR,		
MS, 17	BY MR. TREECE:	14:04:03
AR, AF 18	Q And I realize I may have said show instead	14:04:03
19	of now.	14:04:05
R; H, 20	So I think he's at Marilyn's now	14:04:06
IR, MS,		
AR, AF 21	continuing the rage and coke booze binge. Do you	14:04:08
22	see that?	14:04:11

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1	MS. VASQUEZ: Objection; asked and	14:04:12
2	answered.	14:04:13
R; H, IR, MS, AR, AF; AA	3 THE WITNESS: Yes.	14:04:15
4	BY MR. TREECE:	14:04:16
5	Q And so this is the -- at least the second	14:04:17
6	time we've seen in this deposition where Amber	14:04:19
7	reaches out to you and lets you know that -- that	14:04:21
8	Johnny is in a -- a coke and alcohol-infused rage;	14:04:25
9	is that right?	14:04:34
10	MS. VASQUEZ: Objection; calls for	14:04:35
11	hearsay, assumes facts, calls for speculation,	14:04:37
12	lack of foundation, calls for hearsay.	14:04:40
13	MS. HICKOX: And potentially violates the	14:04:43
14	best evidence rule to the extent that we're	14:04:45
15	looking at excerpts of text messages entire --	14:04:46
16	instead of the entire chain.	14:04:49
17	THE WITNESS: She -- she states that he's	14:04:54
18	in a binge, yes.	14:04:57
19	BY MR. TREECE:	14:05:00
20	Q And the prior exhibit she also reached out	14:05:00
21	to you because he was on a binge, correct?	14:05:03
22	MS. VASQUEZ: Objection; calls for	14:05:06

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1 speculation, calls for hearsay.

14:05:07

2 MS. HICKOX: Join.

14:05:10

IU; R; 3 MS. VASQUEZ: And misstates the prior

14:05:11

H; IR; 4 testimony and document.

14:05:13

MS; AR; 5 THE WITNESS: In the --

14:05:20

SP; VA; 6 BY MR. TREECE:

14:05:21

7 Q Do you --

14:05:21

8 A In the prior text?

14:05:22

9 Q Correct. So this is the second time that

14:05:25

10 Amber has reached out to you with respect to these

14:05:26

11 issues, correct?

14:05:28

12 MS. VASQUEZ: Objection; vague and

14:05:29

13 ambiguous, calls for hearsay, calls for

14:05:31

14 speculation, assumes facts.

14:05:33

15 MR. TREECE: You can have a running

14:05:37

IU; R; 16 objection.

14:05:38

H; IR; 17 THE WITNESS: Yes.

14:05:43

MS; AR; 18 BY MR. TREECE:

14:05:45

19 Q And again she says, Can you help. Do you

14:05:45

20 see that?

14:05:48

21 MS. VASQUEZ: Objection; vague and

14:05:48

22 ambiguous.

14:05:49

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1	THE WITNESS: Yes.	14:05:53
2	BY MR. TREECE:	14:05:55
3	Q And she says, He needs to come home. We	14:05:56
4	have no reason to fight. He just aims all his	14:05:58
5	anger at me when he's on it. Do you see that?	14:06:01
6	A Yes.	14:06:06
7	Q And you understood Amber to be telling you	14:06:07
8	that when he's on coke and booze, he aims all of	14:06:10
9	his anger at Amber; isn't that what she conveyed	14:06:13
10	to you?	14:06:17
11	MS. VASQUEZ: Objection; calls for	14:06:17
12	speculation, misstates the prior testimony,	14:06:19
13	assumes facts, lack of foundation, calls for	14:06:21
14	hearsay.	14:06:23
15	MS. HICKOX: Join.	14:06:24
16	THE WITNESS: It is -- it is what she	14:06:36
17	appears to say, yes.	14:06:44
18	BY MR. TREECE:	14:06:47
19	Q And then she says, Don't know what to do.	14:06:47
20	If I leave, I'm not sure we'll be able to come	14:06:50
21	from it. And I don't want to leave him when he's	14:06:53
22	like this, in that state. Then he just has the	14:06:56

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1	echoes of his own mind bouncing around in his	14:06:59
2	head. It's terrible. Do you see that?	14:07:02
3	A Yes.	14:07:05
4	Q And did you understand that Ms. Heard was	14:07:06
5	conveying to you that Johnny doesn't have a full	14:07:11
6	grasp of reality when he's on a alcohol and coke	14:07:15
7	binge?	14:07:19
8	MS. VASQUEZ: Objection; misstates the	14:07:20
9	document, calls for hearsay, calls for	14:07:23
10	speculation, assumes facts, lack of foundation,	14:07:26
11	violates the best evidence rule.	14:07:28
12	MR. TREECE: Running Objection, you can	14:07:31
13	have it.	14:07:33
14	MS. HICKOX: Join.	14:07:33
15	THE WITNESS: I can't assume exactly what	14:07:36
16	she's saying in that manner that you're trying	14:07:38
17	to --	14:07:43
18	BY MR. TREECE:	14:07:43
19	Q What did you -- okay, sorry.	14:07:43
20	What did you understand her to mean when	14:07:45
21	she says he's got echoes of his own mind bouncing	14:07:47
22	around in his head?	14:07:50

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1	MS. VASQUEZ: Objection; calls for	14:07:51
2	speculation, vague and ambiguous.	14:07:53
3	MS. HICKOX: Join.	14:07:55
4	THE WITNESS: I don't really understand	14:08:01
5	her -- for it to be anything specific other than	14:08:04
6	just her description.	14:08:07
7	BY MR. TREECE:	14:08:08
8	Q Were you ever around Johnny when he was on	14:08:08
9	an alcohol and coke binge?	14:08:11
10	MS. VASQUEZ: Objection; calls for	14:08:15
11	speculation, assumes facts, lack of foundation.	14:08:17
12	MS. HICKOX: Join.	14:08:23
13	THE WITNESS: I don't -- I don't recall	14:08:25
14	being around him.	14:08:27
15	BY MR. TREECE:	14:08:29
16	Q Did you ever talk to him when he was on an	14:08:29
17	alcohol and coke binge?	14:08:32
18	MS. VASQUEZ: Same objections.	14:08:35
19	MS. HICKOX: Join.	14:08:36
20	THE WITNESS: Again, I don't recall him	14:08:39
21	being on a binge.	14:08:41
22	BY MR. TREECE:	14:08:44

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1	Q All right. So you respond to Amber's text	14:08:45
2	above and you say, Where are the kids. Do you see	14:08:48
3	that?	14:08:52
4	A Yes.	14:08:52
5	Q Why did you ask where the kids are?	14:08:53
6	A I don't recall.	14:09:04
7	Q Is it because she told you that he's on a	14:09:06
8	bender with Manson in a rage and coke booze binge	14:09:10
9	and you want to make sure that the kids are not	14:09:15
10	around him?	14:09:17
11	MS. VASQUEZ: Objection; compound, asked	14:09:18
12	and answered, misstates the prior testimony.	14:09:19
13	MS. HICKOX: Join.	14:09:23
14	THE WITNESS: I don't recall why I asked	14:09:26
15	that question.	14:09:28
16	BY MR. TREECE:	14:09:30
17	Q But it's fair to say that after she	14:09:30
18	conveys to you what we just reviewed your -- your	14:09:32
19	first response to her was concern for the kids; is	14:09:35
20	that right?	14:09:40
21	MS. VASQUEZ: Objection; misstates the	14:09:40
22	prior testimony, asked and answered.	14:09:42

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1	MS. HICKOX: Join.	14:09:45
2	MS. VASQUEZ: The document speaks for	14:09:46
3	itself.	14:09:48
4	THE WITNESS: I don't -- I don't recall it	14:09:51
5	being a concern, like, in that way for the kids.	14:09:53
6	BY MR. TREECE:	14:09:59
7	Q All right. I'd like to focus you now on	14:10:00
8	17945. Do you see the text that you sent to Amber	14:10:05
9	Heard stating, Do you want to come to the office	14:10:14
10	to talk?	14:10:17
11	A Yes.	14:10:22
12	Q And that's because you empathized with her	14:10:23
13	and the difficulties that she was having with --	14:10:26
14	with Johnny and you wanted to talk to her about	14:10:28
15	them to see if you could help, correct?	14:10:31
16	MS. VASQUEZ: Objection; compound,	14:10:33
17	misstates the document, assumes facts.	14:10:34
18	MS. HICKOX: Join.	14:10:38
19	THE WITNESS: I -- I would say that	14:10:45
20	because she was, you know, reaching out I asked if	14:10:47
21	she wanted to talk.	14:10:50
22	BY MR. TREECE:	14:10:54

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1	Q All right. And then do you see below that	14:10:55
2	she tells you, He needs help. He doesn't have it	14:10:57
3	under control. The coke is hard on us, on him.	14:11:01
4	It makes him believe he's mad at me about	14:11:05
5	everything. Do you see that?	14:11:08
6	MS. VASQUEZ: Objection; misstates the	14:11:08
7	prior testimony, violates the best evidence rule.	14:11:10
8	THE WITNESS: I see that.	14:11:14
9	BY MR. TREECE:	14:11:15
10	Q And she conveyed that to you, correct?	14:11:16
11	MS. VASQUEZ: Objection; vague.	14:11:19
12	THE WITNESS: I'm not sure I understand.	14:11:23
13	BY MR. TREECE:	14:11:25
14	Q Well, let me ask you this: Did you agree	14:11:25
15	that -- at the time you had this text chain that	14:11:29
16	Johnny needed help with drugs and alcohol?	14:11:32
17	MS. VASQUEZ: Objection; vague, assumes	14:11:36
18	facts, calls for speculation.	14:11:39
19	MS. HICKOX: Join.	14:11:42
20	THE WITNESS: I don't recall. I'd have to	14:11:48
21	read through it. I don't -- I don't recall it.	14:11:52
22	BY MR. TREECE:	14:11:57

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1	Q Did you have any reason to doubt that what	14:11:57
2	Amber was telling you was true when she sent these	14:11:59
3	text messages?	14:12:03
4	MS. VASQUEZ: Objection; argumentative,	14:12:04
5	compound.	14:12:08
6	THE WITNESS: I just knew she wanted to	14:12:16
7	talk about something, so...	14:12:17
8	BY MR. TREECE:	14:12:21
9	Q I mean, she's -- this is your little	14:12:21
10	brother, right? So she's telling you about he's	14:12:24
11	on a bender with Manson. You're -- you send a	14:12:27
12	text about where are the kids. You offer to talk	14:12:29
13	to her. She tells you he needs help, he doesn't	14:12:31
14	have it under control, he gets mad at her when	14:12:34
15	he's -- when he's on coke, and he gets mad about	14:12:37
16	everything, right?	14:12:42
17	MS. VASQUEZ: Objection; violently	14:12:43
18	misstates the document, assumes facts, calls for	14:12:47
19	hearsay. Counsel, are you testifying? I am so	14:12:49
20	confused by this line of questioning.	14:12:55
21	BY MR. TREECE:	14:12:58
22	Q You -- you can answer, Ms. Dembrowski.	14:12:58

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1	MS. VASQUEZ: If you understand the	14:13:00
2	question.	14:13:01
3	THE WITNESS: I don't understand the	14:13:02
4	question, so...	14:13:03
5	BY MR. TREECE:	14:13:04
6	Q All right. So at this point in time	14:13:04
7	Amber's conveying some serious concerns about	14:13:08
8	the -- the -- the mental state and well-being of	14:13:11
9	your brother, correct?	14:13:15
10	MS. VASQUEZ: Objection; misstates prior	14:13:16
11	testimony, misstates the document, calls for a	14:13:18
12	conclusion, calls for speculation, hearsay.	14:13:21
13	MS. HICKOX: Join.	14:13:25
14	THE WITNESS: She -- she's reaching out	14:13:29
15	about a specific moment.	14:13:32
16	BY MR. TREECE:	14:13:33
17	Q And you were concerned based on what she	14:13:33
18	conveyed to you, correct?	14:13:36
19	MS. VASQUEZ: Objection; asked and	14:13:37
20	answered, vague and ambiguous, calls for hearsay,	14:13:39
21	assumes facts.	14:13:43
22	THE WITNESS: I was -- I was open to being	14:13:49

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1	able to talk to her.	14:13:52
2	BY MR. TREECE:	14:13:55
3	Q All right. And you responded saying,	14:13:55
4	Worry about everything, I don't love any of it.	14:13:57
5	Do you see that?	14:14:00
6	A Yes.	14:14:02
7	Q What did you mean by that?	14:14:03
8	A I don't know.	14:14:07
9	Q Were you worried at the time you received	14:14:09
10	these text messages?	14:14:11
11	MS. VASQUEZ: Objection; vague.	14:14:13
12	THE WITNESS: Worried about what in	14:14:20
13	particular?	14:14:24
14	BY MR. TREECE:	14:14:25
15	Q Worried about your brother.	14:14:25
16	MS. VASQUEZ: Objection; vague.	14:14:28
17	THE WITNESS: I was worried that -- that,	14:14:52
18	you know -- I was -- I think I was just more	14:14:55
19	worried that there was, like, a constant argument	14:15:08
20	as opposed to normal life, so...	14:15:15
21	BY MR. TREECE:	14:15:19
22	Q Well, they're not together at this point	14:15:19

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1	in time. She's at Marilyn Manson's -- excuse me.	14:15:21
2	He is at Marilyn Manson's on a bender, correct?	14:15:24
3	MS. VASQUEZ: Objection; calls for	14:15:28
4	speculation.	14:15:30
5	MS. HICKOX: Join. And also assumes facts	14:15:32
6	not in evidence.	14:15:35
7	THE WITNESS: Yeah. I think she's	14:15:35
8	assuming that's where he is. That's what the	14:15:38
9	message is.	14:15:41
10	BY MR. TREECE:	14:15:42
11	Q She -- she tells you that's where he is,	14:15:42
12	correct?	14:15:45
13	MS. VASQUEZ: Objection; misstates the	14:15:45
14	document, asked and answered, calls for hearsay.	14:15:47
15	THE WITNESS: She -- she seems to state to	14:15:53
16	me that she assumes he's there.	14:15:56
17	BY MR. TREECE:	14:15:58
18	Q All right. And then you say, I really	14:15:58
19	want to be able to talk to him. Do you see that?	14:16:00
20	A Yes.	14:16:04
21	Q And you're referring to talking to your	14:16:05
22	brother, Johnny, correct?	14:16:08

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1	A Yes.	14:16:10
2	Q Why did you want to talk to him?	14:16:11
3	A I don't -- I don't recall specifically.	14:16:15
4	Q Then Amber responds when you say you want	14:16:19
5	to talk to him that, Yeah, he needs it. Do you	14:16:21
6	see that?	14:16:24
7	A Yes.	14:16:26
8	Q And she's referring to him needing to talk	14:16:27
9	with you, correct?	14:16:30
10	MS. VASQUEZ: Objection; calls for	14:16:31
11	speculation.	14:16:32
12	MS. HICKOX: Join.	14:16:33
13	THE WITNESS: She's referring to we need	14:16:36
14	to talk, it seems to me.	14:16:39
15	BY MR. TREECE:	14:16:40
16	Q And then she says, He's been on a 24-plus	14:16:41
17	binge with Manson, do you see that? And you say,	14:16:45
18	I understand a lot of life things these days.	14:16:49
19	What does that refer to?	14:16:54
20	A I don't recall.	14:16:56
21	Q And then she responds to you, I don't know	14:17:00
22	what to do. I hate that he always aims at me. I	14:17:02

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1	don't want to break up; but he's forcing it, it	14:17:06
2	seems, like he's trying for that. Do you see	14:17:09
3	that?	14:17:11
4	A Yes.	14:17:11
5	Q And Amber conveyed to you that -- that	14:17:17
6	she's concerned about Johnny's welfare, correct?	14:17:20
7	MS. VASQUEZ: Objection; assumes facts,	14:17:23
8	lack of foundation, calls for hearsay, misstates	14:17:25
9	the document.	14:17:28
10	MS. HICKOX: Join.	14:17:30
11	MS. VASQUEZ: Calls for speculation.	14:17:30
12	THE WITNESS: I believe she said earlier	14:17:36
13	in the text.	14:17:38
14	BY MR. TREECE:	14:17:40
15	Q And she conveys to you that she's	14:17:40
16	concerned about their relationship because he's	14:17:42
17	using drugs and alcohol, correct?	14:17:45
18	MS. VASQUEZ: Objection. Objection;	14:17:47
19	compound, assumes facts, lack of foundation, calls	14:17:49
20	for speculation.	14:17:53
21	MS. HICKOX: Join.	14:17:56
22	THE WITNESS: I mean, she was -- she	14:17:59

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1	states that she's worried about the relationship.	14:18:02
2	BY MR. TREECE:	14:18:05
3	Q Because of his drug and alcohol use,	14:18:05
4	correct?	14:18:07
5	MS. VASQUEZ: Same objections.	14:18:09
6	MS. HICKOX: Join.	14:18:11
7	THE WITNESS: I don't know if it's	14:18:13
8	specifically that, but...	14:18:15
9	BY MR. TREECE:	14:18:20
10	Q Well, we talked about earlier how she's	14:18:20
11	saying that when he's -- when he's on booze and	14:18:23
12	coke he gets crazy when he's like this. So that's	14:18:29
13	the context of this text message, right? He's --	14:18:35
14	he's on a bender with Manson doing alcohol and	14:18:38
15	booze, and that's raised all these issues; isn't	14:18:41
16	that right?	14:18:44
17	MS. VASQUEZ: Objection; vague, compound,	14:18:44
18	assumes facts, lack of foundation, calls for	14:18:47
19	hearsay, violates the best evidence rule, calls	14:18:49
20	for speculation.	14:18:53
21	MS. HICKOX: Join.	14:18:57
22	THE WITNESS: To me it's her assumption	14:19:01

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1	that he is with Manson.	14:19:04
2	BY MR. TREECE:	14:19:07
3	Q All right. And you -- you respond to her	14:19:07
4	and you say, You wouldn't be engaged if he didn't	14:19:10
5	love you. Do you see that?	14:19:13
6	A Yes.	14:19:15
7	Q So you're -- you're trying to console her	14:19:16
8	and reassure her that despite whatever he might be	14:19:19
9	doing he still loves Amber, correct?	14:19:22
10	MS. VASQUEZ: Objection; assumes facts.	14:19:24
11	THE WITNESS: So I don't -- I don't know	14:19:44
12	if console would be the actual word but maybe, you	14:19:45
13	know, calm her.	14:19:50
14	BY MR. TREECE:	14:19:53
15	Q All right. And then if we turn to Bates	14:19:53
16	number 17947, at the top you say, Maybe you and I	14:19:57
17	talking could help somehow. Do you see that?	14:20:03
18	A Yes.	14:20:08
19	Q So -- so you're offering to get involved	14:20:09
20	and -- and talk to Amber to try to help the	14:20:12
21	situation somehow, correct?	14:20:14
22	MS. VASQUEZ: Objection; vague and	14:20:15

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1 ambiguous and misstates the document. 14:20:16

2 THE WITNESS: I'm sorry. Could you repeat 14:20:26

3 your question? 14:20:28

4 BY MR. TREECE: 14:20:30

5 Q Yes. You offer to get involved and talk 14:20:30

6 to Amber to try to help the situation; isn't that 14:20:35

7 right? 14:20:38

8 MS. VASQUEZ: Same objections. 14:20:38

9 THE WITNESS: I think the situation I 14:20:51

10 would try to be helpful with would be for her and 14:20:56

11 I to speak so that we could have conversation. 14:20:59

12 BY MR. TREECE: 14:21:03

IU; R; 13 Q And then she goes on to tell you, He's 14:21:03

H; IR; 14:21:05

MS; 14 literally just blowing lines and drinking and 14:21:05

AR; 14:21:08

SP; 15 commiserating with Manson, who's happy to be there 14:21:08

VA; AF 16 for his binge. He's literally been nonstop for 14:21:10

17 24 hours. Do you see that? 14:21:13

18 A Yes. 14:21:21

19 Q And that was conveyed to you, correct? 14:21:22

20 MS. VASQUEZ: Objection; vague, calls for 14:21:26

21 hearsay. 14:21:28

IU; R; 14:21:32

H; IR; 22 THE WITNESS: That is what she wrote. 14:21:32

MS; AR; 14:21:32

SP; VA; 14:21:32

AF 14:21:32

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1	BY MR. TREECE:	14:21:34
2	Q And then she says, He uses us fighting as	14:21:34
3	an excuse for this sort of binge, like with the	14:21:37
4	hotel room in London. Do you see that?	14:21:39
5	A Yes.	14:21:45
6	Q And do you recall Johnny going on a binge	14:21:46
7	in a hotel room in London?	14:21:50
8	MS. VASQUEZ: Objection; assumes facts,	14:21:52
9	calls for speculation.	14:21:54
10	MS. HICKOX: Join.	14:21:55
11	THE WITNESS: I don't recall.	14:21:57
12	BY MR. TREECE:	14:21:59
13	Q Do you recall him passing out in a	14:21:59
14	bathroom after he went on a binge with Paul	14:22:01
15	Bettany and security having to knock in the door?	14:22:05
16	MS. VASQUEZ: Objection; compound, assumes	14:22:08
17	facts, lack of foundation, calls for hearsay,	14:22:11
18	calls for speculation.	14:22:12
19	MS. HICKOX: Join.	14:22:14
20	THE WITNESS: No, I don't recall.	14:22:16
21	BY MR. TREECE:	14:22:20
22	Q She goes on to say, He is just in	14:22:21

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1	another -- excuse me, strike that.	14:22:24
2	But he just is another person when he's on	14:22:26
3	blow. But he's in total denial about it. Makes	14:22:29
4	it impossible for us to really conflict of any	14:22:32
5	kind. He promised me he was done with this in	14:22:35
6	London. He promised. Do you see that?	14:22:40
7	A Yes.	14:22:42
IU; R; H; IR; 8 MS; AR; SP; VA; 9	Q And she's telling you that he's another person when he's using cocaine, correct?	14:22:42 14:22:45
AF	10 MS. VASQUEZ: Objection; calls for 11 speculation, misstates the document.	14:22:48 14:22:49
12	MS. HICKOX: Join.	14:22:53
13	MS. VASQUEZ: Calls for hearsay.	14:22:54
IU; R; H; IR; 14 MS; AR; SP; VA; 15	THE WITNESS: She's telling me that's her interpretation, yes.	14:22:59 14:23:01
AF	16 BY MR. TREECE:	14:23:03
17	Q And did you have any experience with	14:23:03
18	Johnny when he was on cocaine to draw a different	14:23:07
19	conclusion?	14:23:10
20	MS. VASQUEZ: Objection; asked and	14:23:11
21	answered, assumes facts, calls for speculation.	14:23:13
22	MS. HICKOX: Join. And also vague.	14:23:18

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1	THE WITNESS: I don't -- I don't recall	14:23:25
2	having -- I don't recall having spent time with	14:23:26
3	him necessarily when he was on cocaine.	14:23:32
4	BY MR. TREECE:	14:23:37
5	Q All right. And then on page 17948 you	14:23:37
6	say, If you want to talk I am here. Probably	14:23:41
7	better than texting. And then she -- and then	14:23:44
8	Amber says, Yeah, I'd like to talk whenever. And	14:23:47
9	then ultimately she says, I'll call you as soon as	14:23:51
10	I can. Is that okay? You say, Absolutely. The	14:23:54
11	main thing is to make sure he is okay, do you see	14:23:57
12	that, and then the rest will fall into place. Do	14:24:01
13	you see that?	14:24:04
14	A Yes.	14:24:04
15	Q And so you-all had a conversation	14:24:04
16	following this text exchange, did you not?	14:24:07
17	A I don't recall.	14:24:10
18	MS. VASQUEZ: Objection.	14:24:11
19	Ms. Dembrowski, sorry. Assumes facts,	14:24:12
20	calls for speculation.	14:24:14
21	BY MR. TREECE:	14:24:30
22	Q I'm going to show you what is marked as	14:24:31

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1	Exhibit 5.	14:24:33
2	(Exhibit 5 was marked for identification	14:24:34
3	and is attached to the transcript.)	14:24:34
4	THE WITNESS: I have it. I'm going to	14:25:12
5	read it.	14:25:13
6	BY MR. TREECE:	14:25:13
7	Q All right. And at some point I've got a	14:25:13
8	longer document I'm going to show you, and it is	14:25:16
9	not necessary for you to review it in advance. I	14:25:18
10	actually don't think this is either, because we	14:25:21
11	can go through it. Or the other option is to go	14:25:23
12	off the record, allow you to review, and then	14:25:25
13	we'll come back on the record. So those are my	14:25:29
14	two proposals.	14:25:31
15	MR. TREECE: So why don't we go off the	14:25:33
16	record. That will allow you to review this.	14:25:34
17	THE VIDEOGRAPHER: Off record, 2:25.	14:25:36
18	(A recess was taken.)	14:25:39
19	THE VIDEOGRAPHER: On record, 2:32.	14:32:43
20	BY MR. TREECE:	14:32:46
21	Q Ms. Dembrowski, is Exhibit 5 a text	14:32:46
22	exchange between you and Amber Heard on May 25th,	14:32:50

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1	Exhibit 5.	14:24:33
2	(Exhibit 5 was marked for identification	14:24:34
3	and is attached to the transcript.)	14:24:34
4	THE WITNESS: I have it. I'm going to	14:25:12
5	read it.	14:25:13
6	BY MR. TREECE:	14:25:13
7	Q All right. And at some point I've got a	14:25:13
8	longer document I'm going to show you, and it is	14:25:16
9	not necessary for you to review it in advance. I	14:25:18
10	actually don't think this is either, because we	14:25:21
11	can go through it. Or the other option is to go	14:25:23
12	off the record, allow you to review, and then	14:25:25
13	we'll come back on the record. So those are my	14:25:29
14	two proposals.	14:25:31
15	MR. TREECE: So why don't we go off the	14:25:33
16	record. That will allow you to review this.	14:25:34
17	THE VIDEOGRAPHER: Off record, 2:25.	14:25:36
18	(A recess was taken.)	14:25:39
19	THE VIDEOGRAPHER: On record, 2:32.	14:32:43
20	BY MR. TREECE:	14:32:46
21	Q Ms. Dembrowski, is Exhibit 5 a text	14:32:46
22	exchange between you and Amber Heard on May 25th,	14:32:50

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1	2014?	14:32:55
2	MS. VASQUEZ: Objection; assumes facts,	14:32:55
3	lack of foundation, calls for a conclusion.	14:32:57
4	THE WITNESS: Yes.	14:33:03
5	BY MR. TREECE:	14:33:05
6	Q And at the beginning of the text exchange	14:33:07
7	here you reach out asking if Amber wants to talk;	14:33:09
8	isn't that right?	14:33:12
9	A Yes.	14:33:16
10	Q And do you recall that Amber and Johnny	14:33:17
11	took a flight from Boston to Los Angeles on the	14:33:21
12	24th of May, 2014?	14:33:25
13	MS. VASQUEZ: Objection; assumes facts,	14:33:28
14	lack of foundation, calls for speculation.	14:33:30
15	MS. HICKOX: Join.	14:33:33
16	THE WITNESS: I don't recall specific	14:33:36
17	dates, but...	14:33:38
18	BY MR. TREECE:	14:33:40
19	Q You're -- you're aware that there was an	14:33:41
20	incident on a plane involving Johnny and Amber in	14:33:43
21	May of 2014; is that right?	14:33:45
22	MS. VASQUEZ: Objection; assumes facts,	14:33:48

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1	calls for speculation, vague and ambiguous, lack	14:33:50
2	of foundation.	14:33:54
3	MS. HICKOX: Join.	14:33:55
4	THE WITNESS: I wasn't aware of an	14:34:00
5	incident.	14:34:02
6	BY MR. TREECE:	14:34:03
7	Q All right. Well, you were aware that they	14:34:04
8	took a flight from Boston to LA in May of 2014,	14:34:06
9	correct --	14:34:10
10	MS. VASQUEZ: Objection.	14:34:10
11	BY MR. TREECE:	14:34:11
12	Q -- at or around the time of this text	14:34:11
13	exchange; is that right?	14:34:13
14	MS. VASQUEZ: Objection; calls for	14:34:14
15	speculation, asked and answered.	14:34:16
16	THE WITNESS: Again, I don't remember	14:34:21
17	specific dates and trips. There were a lot of	14:34:22
18	trips.	14:34:26
19	BY MR. TREECE:	14:34:29
20	Q All right. Well, let's -- let's take a	14:34:30
21	look at this text exchange. You reach out to see	14:34:32
22	if she wants to talk, and you don't recall why you	14:34:36

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1 reached out as we sit here; is that right? 14:34:39

2 A I don't recall at this moment, no. 14:34:42

3 Q And Amber responds saying, I can't. I'm 14:34:46

4 sorry. But thank you for offering. And then you 14:34:50

5 respond saying, Could be things get better from 14:34:52

6 all this. May know enough to be helpful. I would 14:34:57

7 love if we could talk even a little. Do you see 14:35:00

8 that? 14:35:03

9 A Yes. 14:35:04

10 Q Does that refresh your recollection as to 14:35:05

11 what this incident relates to? 14:35:08

12 A No. 14:35:11

13 MS. VASQUEZ: Objection; vague and 14:35:11

14 ambiguous, calls for speculation, asked and 14:35:12

15 answered. 14:35:16

16 BY MR. TREECE: 14:35:16

IU; R; 17 Q And then it goes on to say, Yes, I hope he 14:35:16
H; IR;

MS; AR; 18 does get better this time. But I can't keep 14:35:20
SP; VA;

AF 19 staying, supporting him, just to watch him do it 14:35:22

20 all over again. He's done this many times before, 14:35:24

21 Tokyo, the island, London, and in parentheses, 14:35:27

22 remember that. Many, many times, and I always 14:35:31

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IU; R; 1	stay. Always believe he's going to get better.	14:35:33
H; IR; 2	And then every three months or so I'm in the exact	14:35:36
MS; 3	same position. Do you see that?	14:35:38
AR; 4	A Yes.	14:35:43
SP; 5	Q And Amber is mentioning Tokyo, the island,	14:35:44
VA; AF 6	and London to you because those were all incidents	14:35:48
7	where Johnny was high on drugs and alcohol and was	14:35:52
8	out of control; is that right?	14:35:59
9	MS. VASQUEZ: Objection; compound, assumes	14:36:01
10	facts, calls for speculation, lack of foundation.	14:36:03
11	MS. HICKOX: Join.	14:36:09
12	THE WITNESS: She mentions them, but I	14:36:13
13	don't know specifically the reasoning behind the	14:36:15
14	mentioning them.	14:36:18
15	BY MR. TREECE:	14:36:20
16	Q Do you recall any incident in Tokyo?	14:36:21
17	MS. VASQUEZ: Objection; vague and	14:36:23
18	ambiguous, calls for speculation.	14:36:25
19	MS. HICKOX: Join.	14:36:27
20	THE WITNESS: I didn't travel to Tokyo	14:36:30
21	with them. I wasn't there.	14:36:33
22	BY MR. TREECE:	14:36:36

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1	Q Are you aware of an incident in Tokyo that	14:36:36
2	she's -- of the incident in Tokyo that she's	14:36:39
3	referring to here?	14:36:42
4	MS. VASQUEZ: Objection; calls for	14:36:43
5	speculation, asked and answered, assumes facts,	14:36:45
6	vague and ambiguous, calls for --	14:36:48
7	MR. TREECE: You can have a running --	14:36:50
8	running objection.	14:36:52
9	MS. HICKOX: I'll join with those	14:36:53
10	objections.	14:36:55
11	THE WITNESS: I don't know that I recall	14:37:06
12	specific trips if I wasn't there.	14:37:09
13	BY MR. TREECE:	14:37:12
14	Q Do you see where she says, London,	14:37:12
15	remember that, exclamation point, question mark?	14:37:14
16	Do you see that?	14:37:18
17	A Yes.	14:37:19
18	Q She's expecting you -- you to remember	14:37:19
19	what happened in London, correct?	14:37:22
20	MS. VASQUEZ: Objection; calls for	14:37:24
21	speculation, asked and answered.	14:37:25
22	THE WITNESS: She's referencing it like I	14:37:32

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1	should know London.	14:37:35
2	BY MR. TREECE:	14:37:36
3	Q As you sit here today do you know what the	14:37:36
4	London reference refers to?	14:37:39
5	MS. VASQUEZ: Objection; assumes facts,	14:37:42
6	lack of foundation, calls for speculation.	14:37:43
7	THE WITNESS: I don't know specifically	14:37:54
8	what she's referring to in London.	14:37:56
9	BY MR. TREECE:	14:37:58
10	Q Did she --	14:37:58
11	A We were in and out of London a lot, so...	14:37:59
IU; R; 12	Q And she tells you that it's essentially a	14:38:01
H; IR;		
MS; AR; 13	three-month cycle, every three months or so he	14:38:05
SP; VA;		
AF 14	just builds up and he gets on a drug and	14:38:08
15	alcohol-infused rage and then takes it out on	14:38:11
16	Amber; isn't that right?	14:38:13
17	MS. VASQUEZ: Objection; assumes facts,	14:38:15
18	calls for speculation, lack of foundation, calls	14:38:16
19	for hearsay, compound.	14:38:19
IU; R; 20	MS. HICKOX: Join.	14:38:24
H; IR;		
MS; AR; 21	THE WITNESS: That's what she wrote.	14:38:27
SP; VA; 22		
AF	BY MR. TREECE:	14:38:30

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IU; R; H; IR; 1 MS; AR; 2 SP; VA; AF 3 4	<p>Q And you ask how they've been up to this point. And then she says, Great, perfect, heaven, until he decides to use. Do you see that?</p> <p>A Yes.</p>	<p>14:38:30</p> <p>14:38:33</p> <p>14:38:37</p> <p>14:38:44</p>
5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22	<p>Q And that was -- you were aware that that was an ongoing issue between Amber and Johnny, his -- his drug use and his behavior while under the influence, correct?</p> <p>MS. VASQUEZ: Objection; compound, assumes facts, calls for speculation.</p> <p>MS. HICKOX: Join.</p> <p>THE WITNESS: I'm sorry?</p> <p>MR. TREECE: Can the court reporter read the last question back, please.</p> <p>(The record was read as requested.)</p> <p>THE WITNESS: I'm not -- I'm not aware of it being an ongoing issue personally, but I know that Amber referenced it occasionally, so...</p> <p>BY MR. TREECE:</p> <p>Q Amber told you that it was an ongoing issue in the text chains that we've already looked at today; isn't that right?</p>	<p>14:38:45</p> <p>14:38:47</p> <p>14:38:50</p> <p>14:38:53</p> <p>14:38:54</p> <p>14:38:56</p> <p>14:38:58</p> <p>14:39:09</p> <p>14:39:12</p> <p>14:39:13</p> <p>14:39:14</p> <p>14:39:39</p> <p>14:39:41</p> <p>14:39:46</p> <p>14:39:50</p> <p>14:39:50</p> <p>14:39:52</p> <p>14:39:55</p>

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1	MS. VASQUEZ: Objection; asked and	14:39:57
2	answered, assumes facts, calls for hearsay,	14:39:58
3	misstates the document.	14:40:01
4	THE WITNESS: Yes, Amber would write it.	14:40:06
5	BY MR. TREECE:	14:40:13
6	Q And then Amber goes on to say, And the	14:40:13
7	drug abuse, all prescription meds, and drinking	14:40:16
8	has been slowly climbing every day. And we've	14:40:18
9	been fine except when there's any hiccup or issue	14:40:22
10	or problem. Then shit hits the fan because he	14:40:25
11	doesn't deal with it as Johnny, he deals with it	14:40:27
12	as a totally different person, a demon. Do you	14:40:30
13	see that?	14:40:33
14	A Yes.	14:40:33
IU; R; 15	Q And so Amber conveyed to you that Johnny	14:40:34
H; IR;	acted like a demon when he was under the influence	14:40:37
MS; AR; 16	of drugs and alcohol; isn't that right?	14:40:41
SP; VA;		
AF 17		
18	MS. VASQUEZ: Objection; misstates the	14:40:43
19	document, calls for speculation, calls for	14:40:45
20	hearsay, vague.	14:40:49
21	MS. HICKOX: Join. And also lacks	14:40:51
22	foundation.	14:40:52

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IU; R; H;
IR; MS;
AR; SP;
VA; AF

1

THE WITNESS: It is what she wrote.

14:40:57

2

BY MR. TREECE:

14:41:00

3

Q And what did you think about that?

14:41:01

4

MS. VASQUEZ: Objection; vague.

14:41:04

5

THE WITNESS: I thought she was dramatic

14:41:13

6

always.

14:41:17

7

BY MR. TREECE:

14:41:19

8

Q Do you see where it goes on to say, It was

14:41:19

9

the worst I've ever seen him. I think it's

14:41:22

10

because he's now taking Adderall on top of all of

14:41:24

11

the other shit, which is the equivalent to

14:41:27

12

consuming a pharmaceutical speedball every day.

14:41:29

13

He will die if he continues to call being sober

14:41:32

14

just not drinking. And his medicine kit includes

14:41:34

15

tons of new drugs. He's going to kill himself,

14:41:37

16

Christi. Do you see that?

14:41:40

17

A Yes.

14:41:41

18

Q And she -- were you concerned about his

14:41:43

19

drug use and what Amber is conveying to you in

14:41:48

20

this text message?

14:41:50

21

MS. VASQUEZ: Objection; calls for

14:41:52

22

speculation, assumes facts, lack of foundation.

14:41:53

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1	MS. HICKOX: Join. And also compound.	14:41:58
2	THE WITNESS: I was never really sure	14:42:09
3	of -- of things not being presented as	14:42:16
4	overdramatic, so...	14:42:19
5	BY MR. TREECE:	14:42:23
R; AF; 6	Q After the -- the plane incident you	14:42:23
VA;		
FSPK 7	actually engaged Dr. Kipper to try to get Johnny	14:42:26
8	sober, did you not?	14:42:29
9	MS. VASQUEZ: Objection; assumes facts,	14:42:31
10	vague and ambiguous, lack of foundation.	14:42:35
R; AF; 11	THE WITNESS: I'm sorry. You're asking if	14:42:55
VA;		
FSPK 12	I engaged Dr. Kipper?	14:42:57
13	BY MR. TREECE:	14:42:59
R; AF; 14	Q Correct.	14:42:59
VA;		
FSPK 15	A We introduced him to Dr. Kipper, yes.	14:43:04
16	Q And that was after the plane incident	14:43:07
17	where Johnny was belligerent and abusive; isn't	14:43:10
18	that right?	14:43:16
19	MS. VASQUEZ: Objection; assumes facts,	14:43:17
20	lack of foundation, compound, calls for	14:43:18
21	speculation, asked and answered.	14:43:21
22	THE WITNESS: I don't know the timeline,	14:43:27

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1	but I don't recall that being a reason, so...	14:43:28
2	BY MR. TREECE:	14:43:32
3	Q What do you recall being the reason?	14:43:32
4	MS. VASQUEZ: Objection; vague.	14:43:35
5	THE WITNESS: I recall -- I recall -- I	14:43:51
6	recall that it was a good idea. It felt like a	14:43:58
7	good idea to have him meet with Dr. Kipper.	14:44:01
8	BY MR. TREECE:	14:44:09
9	Q Based on what information? What	14:44:10
10	information led you to conclude that that was a	14:44:11
11	good idea?	14:44:14
12	MS. VASQUEZ: Objection; calls for	14:44:16
13	hearsay.	14:44:19
14	THE WITNESS: Based on the idea that -- of	14:44:23
15	some of the, you know, medications or whatever	14:44:27
16	that he was taking.	14:44:36
17	BY MR. TREECE:	14:44:40
18	Q It was your understanding that he was	14:44:40
19	abusing those medications; isn't that right?	14:44:42
20	MS. VASQUEZ: Objection; calls for	14:44:44
21	speculation, calls for a medical opinion.	14:44:46
22	THE WITNESS: Yeah, because I don't --	14:44:54

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IU; R; 16
H; IR;
MS; AR; 17
SP; VA;
AF 18

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101

1	Q And she conveyed that to you. Did you	14:46:00
2	agree that he had a demon on his back that he	14:46:03
3	needed to get rid of?	14:46:06
4	MS. VASQUEZ: Objection; compound, vague	14:46:07
5	and ambiguous, calls for speculation.	14:46:09
6	THE WITNESS: I didn't feel he had a	14:46:16
7	demon --	14:46:18
8	BY MR. TREECE:	14:46:19
9	Q All right.	14:46:19
10	A -- on his back.	14:46:19
11	Q And then you go on to say to Amber that	14:46:21
12	you know Amber doesn't want to lose him and that	14:46:24
13	you know Amber loves him, correct?	14:46:27
14	A Uh-huh.	14:46:29
15	Q And then you go on to say, Needs help and	14:46:34
16	I don't have all the information to help alone.	14:46:39
17	Do you see that?	14:46:42
18	A Yes.	14:46:44
19	Q And you say that in response to this --	14:46:45
20	this text chain that we've been looking at where	14:46:48
21	Amber is telling you of all the issues he's having	14:46:50
22	with -- with drugs and alcohol; isn't that right?	14:46:54

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1	MS. VASQUEZ: Objection; calls for	14:46:58
2	hearsay, assumes facts, misstates the document.	14:47:01
3	THE WITNESS: To me what I'm saying is I	14:47:12
4	love him and want to help him in whatever he would	14:47:15
5	need, but I don't have all of the information,	14:47:19
6	so...	14:47:22
7	BY MR. TREECE:	14:47:22
8	Q And then you go ahead and on the next page	14:47:23
9	ask if Amber would speak to you to fill you in,	14:47:26
10	correct?	14:47:30
11	A Yes.	14:47:37
12	Q And Amber says of course she will, she was	14:47:38
13	the only one that was sober during this whole	14:47:41
14	event that she's been discussing with you; isn't	14:47:44
15	that right?	14:47:48
16	MS. VASQUEZ: Objection; vague.	14:47:51
17	THE WITNESS: I don't know what she's	14:47:57
18	referring to in present for this whole thing. I'm	14:48:02
19	not sure what the reference is for that.	14:48:08
20	BY MR. TREECE:	14:48:09
21	Q Do you recall a flight where Johnny threw	14:48:10
22	ice at Amber, where Johnny kicked Amber in the	14:48:13

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1	back, where Johnny slapped her in the face, and	14:48:17
2	where Johnny berated her for filming Adderall	14:48:20
3	Diaries with James Franco?	14:48:23
4	MS. VASQUEZ: Objection; compound, assumes	14:48:26
5	facts, lack of foundation, calls for hearsay,	14:48:28
6	calls for speculation.	14:48:31
7	MS. HICKOX: Join.	14:48:34
8	THE WITNESS: No.	14:48:35
9	BY MR. TREECE:	14:48:42
10	Q All right. And then if you'll turn to	14:48:43
11	17935. You-all discuss getting together to talk.	14:48:45
12	Amber says she's waiting at 72. And then you say,	14:49:04
13	Meet me in 66. Do you see that?	14:49:09
14	A I'm -- I'm trying to get to it.	14:49:11
15	Q Okay. I've got it on the screen for you.	14:49:14
16	A Okay. I'm -- I'm on that page.	14:49:31
17	Q All right. So she says, I'm waiting at 72	14:49:33
18	to talk if you want to. And you said, Meet me in	14:49:36
19	66. Do you see that?	14:49:39
20	MS. VASQUEZ: Objection; misstates the	14:49:43
21	document.	14:49:45
22	THE WITNESS: I -- I do see that.	14:49:51

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1	BY MR. TREECE:	14:49:53
2	Q And that refers to one of the properties	14:49:53
3	at Sweetzer; is that right?	14:49:56
4	MS. VASQUEZ: Objection; vague.	14:49:59
5	THE WITNESS: Yes.	14:50:01
6	BY MR. TREECE:	14:50:03
7	Q And you-all met at -- at one of the	14:50:03
8	properties at Sweetzer on May 25th, 2014, correct?	14:50:06
9	MS. VASQUEZ: Objection; calls for	14:50:11
10	speculation, assumes facts.	14:50:13
11	THE WITNESS: I don't recall, but...	14:50:16
12	BY MR. TREECE:	14:50:21
13	Q So this text chain and -- and the events	14:50:22
14	surrounding it don't stand out in your mind?	14:50:26
15	A Not at the moment, no.	14:50:29
16	Q And then Amber responds after about three	14:50:31
17	hours after you say meet me in 66 and says, I'm	14:50:36
18	brokenhearted. And then you say, He is going to	14:50:40
19	see the doctor in the morning. Do you see that?	14:50:43
20	A Yes.	14:50:50
21	Q Had you ever sent -- had you ever sent	14:50:51
22	Johnny to a doctor for alcohol or drug treatment	14:50:54

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1	before May 25th, 2014?	14:50:58
2	MS. VASQUEZ: Objection; assumes facts,	14:51:01
3	lack of foundation.	14:51:04
4	MS. HICKOX: Join.	14:51:08
5	THE WITNESS: I -- I -- I don't recall	14:51:09
6	dates. These are -- this is so long ago. I don't	14:51:11
7	recall dates.	14:51:15
8	BY MR. TREECE:	14:51:16
9	Q Yeah. Let me ask you this: Was Dr.	14:51:16
10	Kipper the first doctor that you recall engaging	14:51:18
11	to see Johnny over drug and alcohol use?	14:51:22
12	MS. VASQUEZ: Objection; assumes facts,	14:51:26
13	lack of foundation, calls for speculation.	14:51:28
14	THE WITNESS: Dr. Kipper is -- yeah,	14:51:38
15	that's who I recall having him meet.	14:51:45
16	BY MR. TREECE:	14:51:49
17	Q And it doesn't stand out for you a	14:51:50
18	particular reason that prompted you to reach out	14:51:53
19	to a doctor to get a doctor involved with Johnny	14:51:54
20	and his drug and alcohol use?	14:51:57
21	MS. VASQUEZ: Objection; compound,	14:51:59
22	argumentative, assumes facts, asked and answered.	14:52:01

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1 THE WITNESS: There is no specific 14:52:10
2 incident or anything that I recall as being the 14:52:16
3 reason other than, you know, with all the -- the 14:52:20
4 thought that, you know, if he was doing anything 14:52:31
5 extra that I wasn't used to him ever doing that he 14:52:37
6 should meet with the doctor. 14:52:42

7 BY MR. TREECE: 14:52:44

8 Q Do you recall Amber telling you that 14:52:45
9 Johnny had kicked her when he was under the 14:52:48
10 influence of drugs and alcohol? 14:52:55

11 MS. VASQUEZ: Objection; calls for 14:52:59
12 hearsay, calls for speculation. 14:53:01

13 MS. HICKOX: Join. And it also assumes 14:53:03
14 facts not in evidence. 14:53:06

15 THE WITNESS: No. 14:53:08

16 BY MR. TREECE: 14:53:09

IR; R; 17 Q And if you take a look at the text on 14:53:10
H; IR;
MS; AR; 18 17937, do you see Amber saying, I don't need a 14:53:15
SP; VA;
AF 19 kick in the back to be hurt? Do you see that? 14:53:20

20 MS. HICKOX: Objection; it misstates the 14:53:40
21 contents of the document. 14:53:42

IR; R; 22 THE WITNESS: I do see that. 14:53:46
H; IR;
MS; AR;
SP; VA;
AF

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1 BY MR. TREECE: 14:53:48

2 Q And -- and she then refers to her heart 14:53:48

3 aching. So she's essentially saying, you know, I 14:53:52

4 don't need him to physically hit me to be hurt, my 14:53:55

5 heart is aching; isn't that right? 14:53:58

6 MS. VASQUEZ: Objection; calls for 14:54:01

7 speculation, misstates the document, calls for 14:54:02

8 hearsay. 14:54:05

9 MS. HICKOX: Join. 14:54:05

10 THE WITNESS: No, I don't think that's 14:54:07

11 what it says. 14:54:09

12 BY MR. TREECE: 14:54:10

13 Q Do you recall -- I mean, I realize you 14:54:10

14 haven't had a specific recollection up to this 14:54:13

15 point; but do you recall Amber telling you that 14:54:15

16 Johnny kicked her? 14:54:18

17 A No. 14:54:20

18 MS. VASQUEZ: Objection; vague. 14:54:20

19 BY MR. TREECE: 14:54:25

IU; R; 20 Q All right. And in this text message she 14:54:25
H; IR;

MS; AR; 21 says, I am not going to keep falling back into the 14:54:29
SP; VA;

AF 22 same patterns that always repeat themselves. If 14:54:33

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IU; R; 1	he truly wants to get help, beyond one doctor's	14:54:36
H; IR;		
MS; AR; 2	appointment, truly decides to change his life,	14:54:39
SP; VA;		
AF 3	then I hope he would come find me. But not until	14:54:42
4	he's made the decision. Not just saying he will,	14:54:45
5	which I have heard a thousand times from him.	14:54:49
6	I've heard him promise so many times the same	14:54:51
7	thing; and every time I trust him, believe him,	14:54:54
8	and every time he ends up hurting me. He ends up	14:54:56
9	hurting me. I don't need a kick in the back to be	14:55:00
10	hurt. Right now my heart is aching. I'm so hurt	14:55:03
11	and feel so lost without him. Do you see that?	14:55:05
12	MS. HICKOX: Objection; misstates the	14:55:09
13	document.	14:55:11
IU; R; H; 13		
IR; MS; 14	THE WITNESS: Yes, I see that.	14:55:11
AR; SP;		
VA; AF 15	BY MR. TREECE:	14:55:12
16	Q And she is conveying to you here what	14:55:13
17	we've seen previously, that there is a cycle of	14:55:16
18	drug abuse and rage on the part of Johnny that	14:55:19
19	keeps repeating itself over and over, correct?	14:55:24
20	MS. VASQUEZ: Objection; misstates the	14:55:27
21	document, calls for hearsay, calls for	14:55:29
22	speculation, assumes facts, lack of foundation.	14:55:33

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1	MS. HICKOX: Join.	14:55:36
2	MS. VASQUEZ: It's compound.	14:55:39
3	THE WITNESS: I think she's -- you know,	14:55:47
4	she's stating that she has a concern, you know;	14:55:50
5	but I wouldn't -- I wouldn't say that she's	14:55:53
6	stating rage or whatever you just said because	14:55:58
7	it -- to me those words are written -- they have a	14:56:02
8	different meaning to me than what -- from the way	14:56:07
9	I'm reading it right now, they have a different	14:56:09
10	meaning than what you're alluding to.	14:56:12
11	BY MR. TREECE:	14:56:15
12	Q You tell Amber in -- in this chain she	14:56:15
13	needs to tell Johnny that she's scared; is that	14:56:19
14	right?	14:56:23
O 15	MS. VASQUEZ: Misstates the document.	14:56:27
16	THE WITNESS: I don't -- oh, wait. Yes.	14:56:31
17	BY MR. TREECE:	14:56:45
18	Q Okay. And you knew that Amber was scared	14:56:45
19	of Johnny when he behaved like this, correct?	14:56:47
O 20	MS. VASQUEZ: Objection; calls for	14:56:50
21	speculation.	14:56:52
22	MS. HICKOX: Join.	14:56:53

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1	THE WITNESS: No.	14:56:55
2	BY MR. TREECE:	14:56:56
3	Q Why did you tell Amber to tell Johnny that	14:56:56
4	she was scared?	14:56:59
5	A I feel like from the relationship that I	14:57:03
6	had with her, it was more of scared of, you know,	14:57:05
7	losing him or breaking up. It wasn't scared in	14:57:08
8	the physical sense of scared. It was the	14:57:11
9	emotional scared.	14:57:14
10	Q And then do you see the text at the bottom	14:57:21
11	here that says, He should know because he should	14:57:24
12	love me. And know if anyone did this to you or	14:57:26
13	Lily-Rose he'd fucking kill them. He needs to be	14:57:29
14	accountable. Do you see that?	14:57:32
15	A Yes.	14:57:34
16	Q Do you know what that refers to?	14:57:35
17	MS. VASQUEZ: Objection; calls for	14:57:38
18	speculation.	14:57:40
19	MS. HICKOX: Join.	14:57:40
20	THE WITNESS: Specifically, no.	14:57:43
21	BY MR. TREECE:	14:57:45
22	Q And then do you see where it goes on to	14:57:45

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1	say, And aware enough to know that. To know how	14:57:48
2	much I've been put through and how scared I must	14:57:52
3	be. I've given him a thousand sorrys and a	14:57:55
4	thousand chances and couldn't have been more	14:57:57
5	supportive throughout. Do you see that?	14:57:59
6	A Yes.	14:58:01
7	Q And he's not aware enough to know because	14:58:02
8	he blacks out; isn't that right?	14:58:05
O 9	MS. VASQUEZ: Objection; calls for	14:58:07
10	speculation, assumes facts, lack of foundation,	14:58:08
11	misstates the document, calls for hearsay.	14:58:11
12	MS. HICKOX: Join.	14:58:14
13	THE WITNESS: No.	14:58:16
14	BY MR. TREECE:	14:58:21
15	Q Now, she conveyed to you that he's not	14:58:21
16	aware enough to know what he's doing; is that	14:58:24
17	right?	14:58:27
O 18	MS. VASQUEZ: Objection; misstates the	14:58:27
19	document, vague and ambiguous.	14:58:29
20	MS. HICKOX: Join.	14:58:31
21	THE WITNESS: She -- she says that he's	14:58:36
22	not in aware -- well, aware enough to know that.	14:58:40

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1	Yes, but it's more on an emotional is what she's	14:58:46
2	referring to.	14:58:51
3	BY MR. TREECE:	14:58:51
4	Q How do you gather that?	14:58:52
5	A From the relationship for all the years.	14:58:54
6	It's how she spoke. It's how we spoke.	14:58:58
7	Q All right. Well, I mean, before you	14:59:02
8	didn't really recall how you-all spoke. So why	14:59:04
9	don't you elaborate now that you seem to recall	14:59:06
10	how you-all spoke. How did you-all speak?	14:59:09
O 11	MS. VASQUEZ: Objection; vague, ambiguous,	14:59:12
12	harassing, argumentative.	14:59:14
13	MS. HICKOX: Join.	14:59:19
14	THE WITNESS: Okay. I don't recall	14:59:21
15	specifics all the time, but I can recall general	14:59:23
16	in terms of some of these -- some of these texts,	14:59:28
17	the way they're written, they're much more about	14:59:33
18	emotional as opposed to, you know, the different	14:59:37
19	interpretation.	14:59:44
20	BY MR. TREECE:	14:59:45
21	Q So you're going off of what you're reading	14:59:45
22	off of the texts now?	14:59:47

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1	A I'm sorry?	14:59:50
2	MS. VASQUEZ: Objection; vague, ambiguous,	14:59:50
3	harassing, argumentative.	14:59:53
4	MS. HICKOX: Join.	14:59:55.
5	BY MR. TREECE:	14:59:56
6	Q What I'm trying to understand is there was	14:59:56
7	an event on a -- on the plane where Amber says	15:00:00
8	that Johnny threw ice at her, that he slapped her,	15:00:03
9	that he kicked her in the back, and that was the	15:00:07
10	day before this text exchange. And I'm trying to	15:00:10
11	figure out if you know anything about that or if	15:00:12
12	the conclusions you're drawing about emotional	15:00:15
13	concerns are based solely on this text chain. I'm	15:00:18
14	trying to find out the source of your knowledge.	15:00:22
15	MS. VASQUEZ: Objection; argumentative,	15:00:26
16	unintelligible, vague and ambiguous, assumes	15:00:30
17	facts, lack of foundation, calls for hearsay.	15:00:35
18	MS. HICKOX: Join.	15:00:38
19	THE WITNESS: I've already stated that I	15:00:43
20	have no knowledge of any of what you just	15:00:45
21	described on a plane, no knowledge.	15:00:47
22	BY MR. TREECE:	15:00:53

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1	Q And -- and what I'm trying to understand	15:00:54
2	is how you're deriving the conclusion that this is	15:00:55
3	only about emotional abuse when it referred to in	15:01:00
4	this chain a kick in the back?	15:01:03
5	MS. VASQUEZ: Objection; misstates prior	15:01:06
6	testimony, misstates the document, assumes facts,	15:01:10
7	calls for hearsay, calls for speculation --	15:01:14
8	MS. HICKOX: Join..	15:01:17
9	MS. VASQUEZ: -- argumentative.	15:01:18
10	MS. HICKOX: Join.	15:01:19
11	THE WITNESS: I don't even think I said	15:01:21
12	emotional abuse. I said that when we had	15:01:23
13	conversations, you know, she reached out to me for	15:01:29
14	anything or if there was a conversation about any	15:01:34
15	kind of an argument that the -- these descriptions	15:01:36
16	in here fit those kinds of conversations.	15:01:42
17	MS. HICKOX: Counsel, if you're about to	15:01:52
18	go to a next document, it is lunchtime in	15:01:53
19	California.	15:01:55
20	MR. TREECE: Sure.	15:01:57
21	MS. HICKOX: If we could take a lunch	15:01:58
22	break.	15:02:00

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1	MR. TREECE: Not a problem.	15:02:00
2	MS. VASQUEZ: Forty-five minutes everyone?	15:02:01
3	MS. HICKOX: That works for me.	15:02:03
4	MS. VASQUEZ: Okay. Thanks.	15:02:06
5	THE VIDEOGRAPHER: Anything else before we	15:02:08
6	go off record, Mr. Treece?	15:02:09
7	MR. TREECE: No.	15:02:10
8	THE VIDEOGRAPHER: Off record, 3:02.	15:02:12
9	(A recess was taken.)	15:02:14
10	THE VIDEOGRAPHER: On record, 3:50.	15:50:52
11	BY MR. TREECE:	15:50:55
12	Q Ms. Dembrowski, I'm going to show you what	15:50:59
13	has been marked as Exhibit 6. I'm going to put	15:51:01
14	that in the Chat box and then share screen.	15:51:04
15	(Exhibit 6 was marked for identification	15:51:14
16	and is attached to the transcript.)	15:51:18
17	BY MR. TREECE:	15:51:18
18	Q Ms. Dembrowski, I'll represent to you --	15:51:18
19	and can everyone see the screen there? I want to	15:51:23
20	make sure I'm -- can you see Exhibit 6 on the	15:51:25
21	screen?	15:51:29
22	A Yes.	15:51:30

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1	Q All right. And this is a -- a production	15:51:31
2	from Johnny Depp's counsel that includes a lot of	15:51:37
3	different texts. So the same approach as before.	15:51:41
4	If you want to read them all, we can go off the	15:51:45
5	record and you can do that, or I can go through	15:51:47
6	and ask you about the ones that -- that you're on.	15:51:50
7	Do you want to -- would you like to read them all	15:51:54
8	or would you like me to go through and ask you	15:51:57
9	about the ones that you're on?	15:51:58
10	A I'd like to read them.	15:51:58
11	MR. TREECE: All right. Let's go off the	15:51:59
12	record.	15:52:01
13	THE VIDEOGRAPHER: Off record, 3:52.	15:52:01
14	(A recess was taken.)	15:52:05
15	THE VIDEOGRAPHER: On record, 4:01. Do we	16:01:22
16	need to go off?	16:01:41
17	MS. VASQUEZ: No. I'm going to object to	16:01:42
18	counsel for Ms. Heard taking us off the record.	16:01:46
19	First and foremost, Mr. Treece is not allowed	16:01:51
20	unilaterally to take us off the record. He needs	16:01:54
21	agreement of all counsel.	16:01:57
22	Second of all, Ms. Dembrowski and none of	16:01:59

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1 us are going to sit here for 15 hours so that he 16:02:02
2 can get seven hours of tape time and keep taking 16:02:06
3 us off the record so the witness can review 16:02:09
4 documents that he's providing her that are 24 16:02:11
5 pages long. 16:02:15

6 So from now on if Ms. Dembrowski needs to 16:02:16
7 review a document, I'm going to insist that she 16:02:20
8 does it on the record so it counts against his 16:02:22
9 time. If he would like to direct the witness to 16:02:25
10 questions and specific passages, but he also has 16:02:28
11 to allow her to read the document entirely if she 16:02:30
12 so chooses. But I am not going to agree to going 16:02:33
13 off the record every time Mr. Treece shows this 16:02:38
14 witness a document. 16:02:42

15 MR. TREECE: And I would like -- 16:02:44

16 MS. VASQUEZ: And the court reporter needs 16:02:45
17 to allow -- you need agreement of all counsel to 16:02:46
18 go off the record. I know the court reporter 16:02:49
19 knows that. 16:02:52

20 MR. TREECE: And I would point out for the 16:02:53
21 record that this is a document that was produced 16:02:55
22 by Depp's counsel that has all manner of -- of 16:02:57

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1	texts that don't relate to the witness and --	16:03:01
2	MS. VASQUEZ: Your -- it's your	16:03:03
3	deposition, Mr. Treece. You're the one choosing	16:03:05
4	to show it to a witness that didn't produce it --	16:03:07
5	MR. TREECE: That's correct.	16:03:09
6	MS. VASQUEZ: -- and doesn't have --	16:03:10
7	MR. TREECE: Camille, Camille, I was quiet	16:03:11
8	while you objected. I was quiet while you	16:03:14
9	objected. Let me get on the record, please.	16:03:14
10	Goodness gracious.	16:03:16
11	So point being is I'm going to direct the	16:03:17
12	witness to the relevant text messages to review	16:03:20
13	them. What I'm trying to avoid is some extended	16:03:22
14	period of review over irrelevant stuff that the	16:03:24
15	witness doesn't need to review because it's not	16:03:27
16	relevant to my inquiry. And so that's sort of	16:03:29
17	where we are on that. So with that we'll -- we'll	16:03:32
18	proceed.	16:03:35
19	BY MR. TREECE:	16:03:35
20	Q Ms. Dembrowski, if you'll take a look at	16:03:36
21	the first page of Exhibit 6. Do you see the first	16:03:37
22	entry there that has Sis and a phone number in the	16:03:41

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1	Participant column?	16:03:49
2	A Yes.	16:03:51
3	Q And is that your phone number?	16:03:51
4	A The number next to Sis?	16:03:53
5	Q Correct.	16:03:55
6	A You know, I'm going to see if I can make	16:03:58
7	this bigger. Sorry.	16:04:00
8	Q Sure. And -- and you can -- it's in the	16:04:02
9	Chat box if you want to download it.	16:04:05
10	A I did. I downloaded it. I'm going to see	16:04:07
11	if I can just make it a little bit bigger.	16:04:09
12	I'm not seeing how to do that, so I'll do	16:04:32
13	my best.	16:04:34
14	Q If you press control and plus, that will	16:04:35
15	do it, when you're on the document.	16:04:38
16	And control and minus zooms out.	16:04:50
17	THE TECHNICIAN: She's on a Mac. And,	16:04:53
18	also, you'll need to pass her remote control for	16:04:55
19	her to --	16:04:59
20	MR. TREECE: Okay. Well, maybe I can --	16:05:00
21	maybe I can zoom in. Let me know if this helps.	16:05:02
22	Does that do it?	16:05:05

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1	THE WITNESS: I think I found something.	16:05:06
2	Wait one second.	16:05:07
3	Okay. I've figured out how to zoom in.	16:05:25
4	BY MR. TREECE:	16:05:27
5	Q Okay. Is that your number beside the word	16:05:28
6	Sis --	16:05:31
7	A No.	16:05:31
8	Q -- in the first column that says 1578	16:05:32
9	under Chat number?	16:05:36
10	A No.	16:05:37
11	Q Is that Debbie Depp's number?	16:05:38
12	A No.	16:05:41
13	Q Do you know whose number that is?	16:05:42
14	A No.	16:05:45
15	Q Do you know -- strike that.	16:05:49
16	And then do you see where it says Chris	16:05:51
17	Dembrowski?	16:05:54
18	A Yes.	16:05:56
19	Q Does that refer to you?	16:05:57
20	A No.	16:06:00
21	Q Who does that refer to?	16:06:01
22	MS. VASQUEZ: Objection; calls for	16:06:04

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1	speculation.	16:06:05
2	MS. HICKOX: Join.	16:06:06
3	THE WITNESS: I think it refers to Johnny.	16:06:15
4	BY MR. TREECE:	16:06:21
5	Q And why would you think that refers to	16:06:21
6	Johnny?	16:06:23
7	A I'm looking at what's next to it.	16:06:28
8	Q And specifically what are you looking at?	16:06:31
9	A An E-mail address.	16:06:40
10	Q And is that the E-mail address	16:06:42
11	richardt@at@aol.com?	16:06:48
12	A Yes.	16:06:49
13	Q And is that one of Johnny's E-mail	16:06:50
14	addresses?	16:06:52
15	A I think it was an old E-mail address,	16:06:58
16	so...	16:07:01
17	Q Is -- is that one of Johnny's old E-mail	16:07:01
18	addresses?	16:07:04
19	MS. VASQUEZ: Objection; calls for	16:07:04
20	speculation, asked and answered.	16:07:06
21	THE WITNESS: Yeah, I believe it's an old	16:07:12
22	reference to him.	16:07:14

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1	MR. TREECE: All right. And, Camille,	16:07:19
2	we'll address whether or not Johnny has made a	16:07:21
3	production from that E-mail address at a later	16:07:25
4	date. We don't need to do that now.	16:07:27
5	BY MR. TREECE:	16:07:29
6	Q All right. If you will turn to Depp	16:07:30
7	11249, I will tell you just because of the	16:07:36
8	orientation it's the one that says page 10 at the	16:07:38
9	bottom. And I'm scrolling there myself. Let me	16:07:41
10	know when you're with me. And if you're looking	16:07:44
11	at the screen, that may help.	16:07:47
12	Are you with me?	16:08:02
13	A I'm -- I'm on page 10.	16:08:03
14	Q Okay. And I'm looking at the top of	16:08:05
15	page 10. Do you see the chat number 1646?	16:08:08
16	A Yes.	16:08:14
17	Q And then it says Christi Dembrowski and	16:08:15
18	there's a phone number to the left of that. Do	16:08:18
19	you see that?	16:08:20
20	A Yes.	16:08:21
21	Q And is that your phone number?	16:08:21
22	A Yes.	16:08:24

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123

1	Q All right. And so then over in the From	16:08:25
2	column, this is a text from you to Johnny,	16:08:28
3	correct?	16:08:31
4	A Oh, yes.	16:08:39
5	Q And this is a text from you to Johnny on	16:08:40
6	July 10th, 2013, correct?	16:08:43
7	A Yes.	16:08:48
8	Q And you say, She wants to talk to me. She	16:08:50
9	doesn't know what to do, loves you but doesn't	16:08:53
10	always want to do. She's worry about it all. Do	16:08:57
11	you see that?	16:09:01
12	A Yes.	16:09:02
13	Q Do you recall what that refers to?	16:09:03
14	A No.	16:09:06
15	Q The "she" there refers to Amber Heard,	16:09:07
16	does it not?	16:09:10
17	MS. VASQUEZ: Objection; calls for	16:09:11
18	speculation, asked and answered.	16:09:12
19	BY MR. TREECE:	16:09:12
20	Q And I can help you with that. Why don't	16:09:32
21	you look at the -- the next text below that. Do	16:09:34
22	you see there's a -- a text from Johnny to you on	16:09:36

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1	July 10th, 2013 with the same chat number?	16:09:41
2	A Yes.	16:09:48
3	Q And Johnny says to you, It was not a	16:09:49
4	pleasant day today. And then he goes on to say, I	16:09:53
5	don't need actress bullshit and her fucking	16:09:57
6	ambition. Do you see that?	16:09:59
7	A Yes.	16:10:01
8	Q And so he's -- this text exchange between	16:10:01
9	you two refers to Amber Heard, does it not?	16:10:04
10	MS. VASQUEZ: Objection; calls for	16:10:08
11	speculation.	16:10:09
12	THE WITNESS: I don't recall the text,	16:10:14
13	so....	16:10:16
14	BY MR. TREECE:	16:10:18
15	Q All right. Do you see the text I just	16:10:18
16	read from Johnny where it says, I wasn't aware she	16:10:20
17	had another goddamn photo shoot tomorrow, that's	16:10:23
18	really why she fucking left. I don't need actress	16:10:26
19	bullshit and her fucking ambition.	16:10:28
20	A Yes.	16:10:28
21	Q Do you see that?	16:10:31
22	A Yes.	16:10:31

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125

1	Q If that doesn't refer to Amber, who would	16:10:32
2	it refer to?	16:10:34
3	MS. VASQUEZ: Objection; asked and	16:10:35
4	answered, badgering, calls for speculation.	16:10:37
5	MS. HICKOX: Join.	16:10:42
6	THE WITNESS: I don't know who else it	16:10:43
7	would refer to, so...	16:10:44
8	BY MR. TREECE:	16:10:46
9	Q Would you agree with me that looking at	16:10:46
10	these two texts together the only person that	16:10:48
11	could refer to is Amber Heard?	16:10:50
12	MS. VASQUEZ: Objection; asked and	16:10:52
13	answered, calls for speculation.	16:10:53
14	MS. HICKOX: Join.	16:10:55
15	THE WITNESS: It could.	16:11:03
16	BY MR. TREECE:	16:11:07
17	Q Did Johnny express frustration over	16:11:07
18	Amber's career and her ambition to you other than	16:11:13
19	in this text?	16:11:16
20	MS. VASQUEZ: Objection; assumes facts,	16:11:17
21	calls for hearsay, vague and ambiguous, lack of	16:11:19
22	foundation.	16:11:22

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1	MS. HICKOX: Join.	16:11:23
2	THE WITNESS: Not that I recall	16:11:26
3	specifically.	16:11:28
4	BY MR. TREECE:	16:11:33
5	Q I'm going to go to page 15 at the bottom,	16:11:33
6	and it's got a Bates number of 11254. And do you	16:11:38
7	see at the top the text from -- strike that.	16:11:47
8	Is the top line with the chat number 1646	16:11:51
9	a text from Johnny to you dated October 20th,	16:11:55
10	2013?	16:12:00
11	A I'm sorry. I'm trying to find it, so...	16:12:00
12	Q Oh, sure. It's -- it has 15 -- page 15 at	16:12:03
13	the bottom.	16:12:07
14	MS. VASQUEZ: Counsel, there's numerous	16:12:10
15	chats with the number 1646 just on page 15 alone,	16:12:13
16	so you might want to identify it by the number to	16:12:17
17	the left of Chat.	16:12:20
18	BY MR. TREECE:	16:12:25
19	Q Are you with me on page 15?	16:12:25
20	A I'm not even on page 15 yet.	16:12:26
21	Q Okay. It's -- it's not 15 of the .pdf.	16:12:29
22	It's the one that says 15. It's page 4 of the	16:12:33

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1	.pdf.	16:12:37
2	A Right, no, I -- okay, I see -- I see it.	16:12:37
3	Q All right. And if you take a look at the	16:12:39
4	top, do you see where it says chat number 1646 and	16:12:41
5	it's a text at the top from Johnny to you dated	16:12:44
6	October 20th, 2013?	16:12:49
7	MS. VASQUEZ: Objection; misstates the	16:12:52
8	document. As I have already said, there are	16:12:54
9	numerous chats numbered 1646 on this page.	16:12:56
10	MR. TREECE: I'm reading the -- the top	16:13:00
11	line and I thought I made that clear. Let me	16:13:03
12	restate it.	16:13:06
13	BY MR. TREECE:	16:13:07
14	Q Do you see the top line where it says chat	16:13:07
15	number 1646 and it's a text from Johnny to you	16:13:10
16	dated October 20th, 2013?	16:13:13
17	MS. VASQUEZ: Same objection.	16:13:17
18	THE WITNESS: Yes.	16:13:23
19	BY MR. TREECE:	16:13:24
20	Q All right. And then the chat number is --	16:13:24
21	refers -- appears through the string of chats that	16:13:30
22	you-all had in connection with that chain. And if	16:13:34

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1	you look below that, so Johnny -- there's a	16:13:36
2	chat -- there's a text from him at the top. Then	16:13:40
3	there's a -- there's three more rows on this page.	16:13:43
4	Are all of these rows chats that you and Johnny	16:13:46
5	had on October 20th, 2013?	16:13:49
6	MS. VASQUEZ: Objection; calls for a	16:13:52
7	conclusion, calls for speculation, and assumes	16:13:53
8	facts.	16:13:58
9	MS. HICKOX: And, Christi, you can take	16:14:00
10	your time to review these messages.	16:14:02
11	THE WITNESS: Okay.	16:14:06
12	BY MR. TREECE:	16:14:06
13	Q And just to be clear for the record, I'm	16:14:07
14	not going to ask you any details about the -- the	16:14:08
R 15	messages. I just want to confirm -- in terms of	16:14:11
16	your review, I just want to confirm that these are	16:14:13
17	texts between you and Johnny on October 20th, 2013	16:14:16
18	on page 15.	16:14:19
19	A I'm going to review them, okay?	16:14:32
20	Q If you feel like you need to. Again, I --	16:14:34
21	can you not tell based on the participants in the	16:14:38
22	From line?	16:14:40

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R

1 A It references both of our -- both of us,

16:14:45

2 yes.

16:14:49

3 Q And would that indicate to you that that's
4 texts between you and Johnny on October 20th,
5 2013?

16:14:49

16:14:51

16:14:55

6 MS. VASQUEZ: Objection; calls for a
7 conclusion, vague and ambiguous. The witness --
8 asked and answered. The witness needs to review
9 the messages to answer your question. She's made
10 that abundantly clear.

16:14:55

16:14:57

16:15:00

16:15:02

16:15:04

11 MS. HICKOX: I'm also going to join and
12 add that it calls for speculation. She hasn't
13 seen these messages in this format.

16:15:06

16:15:08

16:15:10

14 MR. TREECE: Well, she did take time off
15 the record to review them, so I'm not sure how
16 much she got through. But I will --

16:15:13

16:15:14

16:15:16

17 MS. HICKOX: Just to clarify --

16:15:19

18 MR. TREECE: -- off the record to do that.

16:15:21

19 MS. HICKOX: All right.

16:15:22

20 BY MR. TREECE:

16:15:22

21 Q But go ahead. I'm just trying to speed it
22 along. I mean, we can sit here forever, but I'm

16:15:23

16:15:26

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1	trying to move through this quickly, so...	16:15:29
2	A I was trying to review the format before.	16:15:31
3	Q Okay. All right. Well, take the time you	16:15:33
4	think you need and then we'll -- we'll address	16:15:36
5	anything else later.	16:15:38
6	A Okay.	16:17:18
R 7	Q And are those texts between you and Johnny	16:17:18
8	on October 20th, 2013 on page 1124?	16:17:22
9	A Yes.	16:17:29
10	Q All right. I'm going to direct you to --	16:17:30
11	MS. HICKOX: Mr. Treece, just belated	16:17:33
12	objection. It's Depp 11254.	16:17:36
13	MR. TREECE: 11254, thank you. That's not	16:17:39
14	necessarily an objection. That's an appropriate	16:17:41
15	correction. Thank you.	16:17:43
16	BY MR. TREECE:	16:17:44
17	Q All right. If you'll scroll to page 25,	16:17:44
18	where it says 25 at the bottom. And let me know	16:17:51
19	when you're with me.	16:18:08
20	A I will.	16:18:10
21	Okay.	16:18:23
22	Q Do you see the text from Lily-Rose to her	16:18:23

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1	dad, Johnny, that says, You've been a better dad	16:18:28
2	to Jack and I since she's been around and she was	16:18:31
3	helping with the alcohol problem. I just see what	16:18:33
4	a positive effect she's had on you and I'm afraid	16:18:36
5	that those things will leave with her. Do you see	16:18:40
6	that?	16:18:43
7	A No. I'm looking for it.	16:18:44
8	Q Okay. It's the -- page 25 at the bottom.	16:18:46
9	The Bates number is 11264. And it's the third	16:18:49
10	from the bottom.	16:18:55
11	A I see it.	16:19:09
12	Q And did Lily-Rose ever express a similar	16:19:10
13	feeling with you in terms of how she viewed Amber	16:19:15
14	and Amber's effect on Johnny?	16:19:20
15	MS. VASQUEZ: Objection; compound, assumes	16:19:22
16	facts, lack of foundation, calls for speculation,	16:19:24
17	calls for hearsay.	16:19:26
18	MS. HICKOX: Join.	16:19:28
19	THE WITNESS: No.	16:19:38
20	BY MR. TREECE:	16:19:38
21	Q Were you aware that Johnny was a better	16:19:38
22	dad when Amber was around?	16:19:41

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1	MS. VASQUEZ: Objection; assumes facts,	16:19:42
2	calls for speculation, calls for hearsay.	16:19:45
3	MS. HICKOX: Join.	16:19:49
4	THE WITNESS: No.	16:19:52
5	BY MR. TREECE:	16:19:52
6	Q All right. If you'll take a look at the	16:19:56
7	top of the next page, and this is page 26, Bates	16:19:57
8	number 11265. Are you with me?	16:20:04
9	A I'm looking.	16:20:10
10	I'm sorry. The -- it's just weird to get	16:20:14
11	to the page numbers on my computer.	16:20:18
12	Q It should be the very next page. Just	16:20:20
13	scroll down to the very next page.	16:20:22
14	A What's the page number of the very next	16:20:32
15	page?	16:20:34
16	Q It's page 26, the bottom.	16:20:34
17	A Okay.	16:20:39
18	Q The one we just looked at was 25.	16:20:39
19	A Okay.	16:20:42
20	Q Are you with me?	16:20:57
21	A Yes.	16:20:58
22	Q All right. Do you see where Lily says to	16:20:59

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1	Johnny, But what about you as a dad? You've been	16:21:01
2	so much better since she's been around. We've	16:21:05
3	talked about how for a couple of years you weren't	16:21:08
4	around us and that changed when Amber came into	16:21:10
5	your life. I don't want to go back to that. Do	16:21:13
6	you see that?	16:21:16
7	A Yes.	16:21:16
8	Q And did any of Johnny's children ever	16:21:16
9	express a similar sentiment to you?	16:21:19
10	MS. VASQUEZ: Objection; vague and	16:21:24
11	ambiguous, calls for hearsay.	16:21:25
12	THE WITNESS: No.	16:21:28
13	BY MR. TREECE:	16:21:30
14	Q Would -- would you agree that Johnny was a	16:21:31
15	better dad when Amber was around?	16:21:34
16	MS. VASQUEZ: Objection; asked and	16:21:36
17	answered literally five seconds ago.	16:21:38
18	THE WITNESS: Johnny's always been a great	16:21:44
19	dad.	16:21:46
20	BY MR. TREECE:	16:21:50
21	Q And then she goes on to say, But you have	16:21:50
22	to acknowledge and you know what a good influence	16:21:53

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1	she's had on you and the fact that that's changed	16:21:56
2	you for the better. You see that, right. Do you	16:21:59
3	see that?	16:22:01
4	A Yes.	16:22:02
5	Q And do you have any personal knowledge	16:22:06
6	about Lily-Rose's views of Amber Heard?	16:22:08
7	MS. VASQUEZ: Objection; calls for	16:22:13
8	speculation, calls for hearsay, assumes facts,	16:22:16
9	vague.	16:22:20
10	MS. HICKOX: Join.	16:22:21
11	THE WITNESS: That's -- that's more of a	16:22:24
12	question for her, not me.	16:22:26
13	BY MR. TREECE:	16:22:28
14	Q So you don't have any personal knowledge	16:22:29
15	of her views with respect to Amber?	16:22:30
16	MS. VASQUEZ: Objection; asked and	16:22:33
17	answered, vague.	16:22:35
18	THE WITNESS: Is there a specific	16:22:45
19	timeline?	16:22:47
20	BY MR. TREECE:	16:22:48
21	Q This time frame, the time frame we're	16:22:48
22	looking at here, which is February 2014.	16:22:50

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16:22:54

16:22:54

16:22:59

16:23:04

16:23:07

16:23:12

16:23:16

16:23:19

16:23:19

16:23:21

16:23:23

16:23:25

16:23:27

16:23:32

16:23:36

16:23:38

16:23:41

16:23:41

16:23:45

16:23:48

16:23:54

16:23:59

22

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1	Q Well, you -- you've got what we've got	16:24:02
2	here. So as you sit here and look at this today,	16:24:04
3	do you have any reason why you would want to send	16:24:08
4	three separate texts, each declaring him to stop	16:24:11
5	doing one of three things related to drugs and	16:24:14
6	alcohol?	16:24:18
7	MS. VASQUEZ: Objection; mischaracterizes	16:24:18
8	the prior testimony, asked and answered.	16:24:21
9	MS. HICKOX: Also calls for speculation,	16:24:25
10	join in the other objections.	16:24:27
11	And, Ms. Dembrowski, I'm just going to	16:24:29
12	remind you not to guess if you don't know.	16:24:31
13	THE WITNESS: Well, that's -- that's the	16:24:33
14	thing. I would have to -- I would have to	16:24:35
15	speculate as to why.	16:24:36
16	BY MR. TREECE:	16:24:37
17	Q This doesn't stand out in your mind as a	16:24:37
18	time where you were trying to reign Johnny in from	16:24:39
19	his drug and alcohol use; is that what you're	16:24:43
20	saying?	16:24:49
21	MS. VASQUEZ: Objection; mischaracterizes	16:24:50
22	the prior testimony, vague and ambiguous.	16:24:52

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1	THE WITNESS: It -- it does not stand out	16:24:58
2	specifically to me, no.	16:25:00
3	BY MR. TREECE:	16:25:28
4	Q I'm going to direct your attention to	16:25:28
5	page 32, Bates number 11271.	16:25:31
6	A Sorry. It takes me a minute to get to the	16:25:48
7	page number.	16:25:51
8	Okay, I'm on the page.	16:26:07
9	Q All right. Do you see the last two texts	16:26:09
10	on this page dated May 27th, 2014?	16:26:11
11	A Yes.	16:26:20
12	Q And the -- the first of those two texts is	16:26:22
13	a text from you to Johnny on May 27th, 2014 at	16:26:26
14	3:12 a.m.; is that right?	16:26:32
15	A Yes.	16:26:37
16	Q And you say, Hope you had a great flight.	16:26:39
17	I bet you're tired. I just wanted to let you know	16:26:42
18	that I spoke with her and she wants to speak to	16:26:44
19	the doctor if you're okay with it, I told her you	16:26:47
20	were, so he can explain better than me. But she	16:26:50
21	was much better about trying and wanting to	16:26:53
22	understand than I thought. She just wants to do	16:26:56

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1	the right thing and help you and also help you to	16:26:59
2	understand how important it is to her. Do you see	16:27:02
3	that? And then it goes on, How important it is to	16:27:05
4	her that you are healthy. Do you see that?	16:27:09
5	A Yes.	16:27:12
6	Q And this is two days -- you may recall we	16:27:12
7	looked at the exhibit from May 25th, 2014, and I	16:27:16
8	was asking you if that referred to a plane	16:27:19
9	incident and you didn't recall. Does this refresh	16:27:21
10	your recollection in any way?	16:27:25
11	A No.	16:27:27
12	Q And we had talked about how around that	16:27:31
13	date you had decided to engage Dr. Kipper. Do you	16:27:34
14	recall that?	16:27:38
15	MS. VASQUEZ: Objection; misstates prior	16:27:39
16	testimony.	16:27:41
17	THE WITNESS: I don't recall around the	16:27:43
18	date.	16:27:44
19	BY MR. TREECE:	16:27:45
20	Q All right. If you'll scroll back up to	16:27:45
21	page 29. Let me know when you're with me. And	16:28:05
22	this is Bates number 11268.	16:28:15

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1	A Okay.	16:28:28
2	Q Do you see the -- the text second from the	16:28:29
3	bottom from Amber Heard to Stephen Deuters that	16:28:32
4	says, Spoke to C. We're going to set him up with	16:28:36
5	Dr. Kipper on Wednesday hopefully. He won't be	16:28:40
6	skipping it this time. Do you see that?	16:28:43
7	A Yes.	16:28:44
8	Q And that's dated May 25th, 2014, correct?	16:28:45
9	A Yes.	16:28:49
10	Q And "C" there refers to you, does it not?	16:28:50
11	MS. VASQUEZ: Objection; calls for	16:28:53
12	speculation, vague and ambiguous.	16:28:54
13	THE WITNESS: I'm not sure.	16:28:59
14	BY MR. TREECE:	16:29:01
15	Q Does that refresh your recollection about	16:29:02
16	trying to get Johnny to see Dr. Kipper and the	16:29:04
17	date?	16:29:07
18	A No.	16:29:08
19	Q Do you have any reason to doubt that	16:29:10
20	you-all were trying to set Johnny up with Dr.	16:29:12
21	Kipper on or around May 25th, 2014?	16:29:15
22	MS. VASQUEZ: Objection; assumes facts,	16:29:18

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1	vague.	16:29:20
2	THE WITNESS: I don't -- I don't recall	16:29:27
3	any -- any reason to remember dates. I don't --	16:29:28
4	the dates aren't -- they don't help me right now.	16:29:31
5	BY MR. TREECE:	16:29:34
6	Q All right. Well, let's -- let's go back	16:29:34
7	to your text messages on page 32.	16:29:36
8	A Okay.	16:29:46
9	Q And do you see -- we reviewed the text	16:29:47
10	number 69890. Now I want to look at the text	16:29:51
11	number 69892. Is this a response from Johnny to	16:29:56
12	you on May 27th, 2014?	16:30:00
13	MS. VASQUEZ: Objection; assumes facts,	16:30:03
14	calls for a conclusion.	16:30:05
15	THE WITNESS: Yes.	16:30:10
16	BY MR. TREECE:	16:30:11
17	Q And he says, No reason for her to speak to	16:30:12
18	anyone, let alone a doctor. I'm out. I'm done.	16:30:14
19	Do you see that?	16:30:19
20	A Yes.	16:30:20
21	Q So he didn't want to see Dr. Kipper; isn't	16:30:20
22	that right?	16:30:23

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1	MS. VASQUEZ: Objection; misstates the	16:30:25
2	document, calls for hearsay, calls for	16:30:26
3	speculation.	16:30:28
4	MS. HICKOX: Join.	16:30:30
5	THE WITNESS: I'm sorry. I think I	16:30:32
6	misunderstood your question. Could you ask it	16:30:35
7	again?	16:30:36
8	MR. TREECE: Can I have the court reporter	16:30:38
9	read my question back, please.	16:30:39
10	(The record was read as requested.)	16:30:40
11	THE WITNESS: I -- I don't see where it	16:30:55
12	says he didn't want to see a doctor in that text.	16:30:57
13	BY MR. TREECE:	16:31:02
14	Q Okay. Was he willing to see Dr. Kipper	16:31:02
15	when you indicated to him that you-all had reached	16:31:06
16	out to Dr. Kipper to help him?	16:31:11
17	MS. VASQUEZ: Objection; assumes facts,	16:31:12
18	calls for speculation.	16:31:14
19	MS. HICKOX: Join.	16:31:16
20	THE WITNESS: Again, I don't recall	16:31:22
21	specifically dates and each instance.	16:31:24
22	BY MR. TREECE:	16:31:30

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1 Q That's why these text messages are -- are 16:31:30
2 meant to help you with your recollection of dates. 16:31:33
3 That's why we're walking through these, but -- 16:31:36

4 A Right. 16:31:38

R 5 Q -- all right. Let me direct you to 16:31:38
6 page 33, which is the following page. And this is 16:31:40
7 Bates number 11272. 16:31:47

8 A Which -- which page? I'm sorry. 16:32:04
9 Thirty-three, you said? 16:32:06

10 Q Correct. 16:32:07

11 A Okay, I'm on 33. 16:32:18

R 12 Q And 33 are texts between -- strike that -- 16:32:20
13 texts from Johnny to you on May 27th, 2014; isn't 16:32:26
14 that right? 16:32:30

15 A Yes. 16:32:35

16 MS. VASQUEZ: Objection; vague. 16:32:35

17 BY MR. TREECE: 16:32:36

18 Q And with respect to the -- the first text, 16:32:37
19 he says to you, She finally sent me a text. I 16:32:39
20 will not respond, at least not in text and not 16:32:42
21 right away. She seems to have it all figured out. 16:32:45
22 Happy reading. Do you see that? 16:32:49

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1	A Yes.	16:32:51
IU; R; H; IR; MS; AR; SP; VA; AF	2 Q And then Johnny provides a copy of Amber's 3 text to him for you to read, correct?	16:32:52 16:32:56
4	MS. VASQUEZ: Objection; calls for	16:32:59
5	speculation, misstates the document, assumes	16:33:00
6	facts, lack of foundation, calls for hearsay.	16:33:06
IU; R; H; IR; MS; AR; SP; VA; AF	7 MS. HICKOX: Join. 8 THE WITNESS: I haven't read it.	16:33:09 16:33:11
9	BY MR. TREECE:	16:33:13
IU; R; H; IR; MS; AR; SP; VA; AF	10 Q All right. So let's -- let's walk through 11 it then. It says, There are so many things to 12 say. I feel like there aren't enough words in the 13 world to articulate what I want to say to you. 14 All I can say is that I am heartbroken. My whole 15 world came crashing down on me. I feel so lost. 16 But I know this: I love you more than I've ever 17 loved anything. I know that you're my one, my 18 life's true love. The fact remains: I can't 19 imagine my life without you, and the inescapable 20 truth is being with you has been the best thing to 21 happen to my life. But only you have the ability 22 to take that away from me, from both of us. I	16:33:13 16:33:16 16:33:19 16:33:21 16:33:24 16:33:27 16:33:29 16:33:32 16:33:34 16:33:38 16:33:41 16:33:43 16:33:45

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IU; R; 1	know you have a sickness. I know you are	16:33:48
H; IR;		
MS; 2	suffering. Johnny, I'd do anything to be able to	16:33:51
AR;		
SP; 3	take that away from you, if only I could. And	16:33:53
VA; AF		
4	then she goes on to say, I love you. You're my	16:33:56
5	Steve. But there is this man, this other part of	16:33:59
6	you, a shadow that exists in that hole in you that	16:34:01
7	you understand is desperately -- that you	16:34:05
8	understandably try desperately to treat, fix,	16:34:08
9	fill. And that's the part, the demon, that is	16:34:11
10	killing us and that's what I'm afraid of. Do you	16:34:14
11	see that?	16:34:17
12	A Yes.	16:34:18
13	Q So Johnny was aware that Amber referred to	16:34:19
14	the part of him that was drawn to drugs and	16:34:25
15	alcohol and the -- the behavior that ensued as the	16:34:29
16	demon, correct?	16:34:32
17	MS. VASQUEZ: Objection; assumes facts,	16:34:33
18	lack of foundation, calls for hearsay, calls for	16:34:36
19	speculation.	16:34:38
20	MS. HICKOX: Join.	16:34:41
21	THE WITNESS: I don't know what all he was	16:34:48
22	aware of.	16:34:49

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1 BY MR. TREECE:

16:34:51

IU; R; H;
IR; MS;
AR; SP;
VA; AF

2 Q Well, she -- she sent him this text, and

16:34:51

3 he sent this text to you, correct?

16:34:53

4 A Yes.

16:34:55

5 MS. VASQUEZ: Assumes facts, calls for
6 hearsay, calls for speculation.

16:34:56

7 MS. HICKOX: Join.

16:34:58

8 BY MR. TREECE:

16:34:59

IU; R;
H; IR;
MS; AR;
SP; VA;
AF

9 Q And he was told in this text by Amber and

16:35:02

10 you were told in this text by Amber because he

16:35:02

11 forwarded it to you that the demon is killing us

16:35:06

12 and that that's what she's afraid of, correct?

16:35:09

13 MS. VASQUEZ: Objection; asked and
14 answered, calls for hearsay, assumes facts, lack
15 of foundation, calls for speculation.

16:35:12

IU; R; H;
IR; MS;
AR; SP;
VA; AF

16 THE WITNESS: It's her descriptive word.

16:35:15

17 BY MR. TREECE:

16:35:18

18 Q And she says, That demon, because despite

16:35:21

19 how much I've tried to fight him off you, he has

16:35:27

20 been winning you. I'm scared, Johnny, so scared.

16:35:29

21 Do you see that?

16:35:30

22 A Yes.

16:35:33

16:35:35

16:35:38

16:35:39

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IU; R; 1
H; IR; 1
MS; AR; 2
SP; VA; 2
AF 3

Q And do you recall telling Ms. Heard in the
text we looked at earlier on May 25th that she
needed to tell Johnny she was scared?

16:35:40

16:35:43

16:35:49

4

MS. VASQUEZ: Objection; misstates the
document, misstates prior testimony, calls for
hearsay.

16:35:52

5

16:35:54

6

16:35:57

7

MS. HICKOX: Join.

16:35:58

IU; R;
H; IR; 8
MS; AR;
SP; VA; 9
AF

THE WITNESS: I remember that.

16:36:02

BY MR. TREECE:

16:36:03

10

Q And then here she's doing what you

16:36:04

11

advised, which is telling Johnny that she's

16:36:06

12

scared, so scared, and she's scared of the demon,

16:36:09

13

correct?

16:36:13

14

MS. VASQUEZ: Objection; calls for

16:36:13

15

speculation, calls for hearsay, double hearsay,

16:36:15

16

assumes facts.

16:36:21

17

THE WITNESS: I think she's scared of

16:36:30

18

losing the relationship.

16:36:31

19

BY MR. TREECE:

16:36:36

20

Q And then she goes on to say, He steals the

16:36:36

21

man from me and replaces him with something

16:36:38

22

terrifying and unrecognizable. Do you see that?

16:36:40

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1	A Yes.	16:36:46
2	Q And that was conveyed to you through this	16:36:46
3	text, was it not?	16:36:49
4	MS. VASQUEZ: Objection; asked and	16:36:51
5	answered, assumes facts, calls for hearsay, calls	16:36:53
6	for speculation, vague.	16:36:55
7	THE WITNESS: They were the words she	16:37:00
8	used.	16:37:01
9	BY MR. TREECE:	16:37:01
10	Q Did you call Johnny and say, What is going	16:37:02
11	on; why -- you know, why is she saying she's	16:37:05
12	terrified of you, scared of you, calling you a	16:37:08
13	demon? Did you have any conversation with her	16:37:11
14	along those lines -- excuse me, any conversation	16:37:13
15	with him along those lines?	16:37:16
16	MS. VASQUEZ: Objection; vague, assumes	16:37:18
17	facts.	16:37:21
18	MR. TREECE: I'll give you a running on	16:37:23
19	all of them so you don't have to struggle.	16:37:25
20	BY MR. TREECE:	16:37:28
21	Q Go ahead, Ms. Dembrowski.	16:37:28
22	MS. VASQUEZ: Unintelligible. If you	16:37:30

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1	understand that question.	16:37:32
2	THE WITNESS: I think the question is	16:37:34
3	confusing, but I don't recall calling my brother	16:37:39
4	on it.	16:37:44
5	BY MR. TREECE:	16:37:46
6	Q Do you recall seeing this text or any	16:37:46
7	other text where you thought, Those are alarming	16:37:48
8	statements about what's going on; I need to call	16:37:51
9	Johnny and find out what's going on?	16:37:54
O 10	MS. VASQUEZ: Objection; assumes facts,	16:37:57
11	vague and ambiguous.	16:37:59
12	THE WITNESS: No.	16:38:07
13	BY MR. TREECE:	16:38:09
14	Q Why not?	16:38:09
O 15	MS. VASQUEZ: Objection; harassing.	16:38:11
16	MS. HICKOX: Join. Also vague.	16:38:16
17	THE WITNESS: From my dealings with it and	16:38:29
18	understanding of it, Amber was very dramatic all	16:38:33
19	the time, so...	16:38:37
20	BY MR. TREECE:	16:38:44
21	Q And that's the reason you didn't reach out	16:38:44
22	to Johnny to find out what was going on?	16:38:46

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149

1 MS. VASQUEZ: Objection; badgering. 16:38:49

2 MR. TREECE: I'll withdraw that. 16:38:53

3 BY MR. TREECE: 16:39:06

R; 4 Q I'm going to direct you to page 43. 16:39:06
MS;

P 5 A Okay. 16:39:32

6 Q And do you see the text identified as 16:39:32

7 70413 from Johnny to you? 16:39:38

8 A Yes. 16:39:44

9 Q And he says, I will fucking savage some 16:39:45

10 mother fucker, 9-21-2014? 16:39:49

11 MS. VASQUEZ: Objection; misread that. 16:39:53

R; MS; 12 THE WITNESS: Yes. 16:39:58
P

13 BY MR. TREECE: 16:40:01

14 Q Do you know why he sent you this? 16:40:02

15 MS. VASQUEZ: Objection; calls for 16:40:04

16 speculation. 16:40:05

17 MS. HICKOX: Join. 16:40:07

18 THE WITNESS: No. 16:40:09

19 BY MR. TREECE: 16:40:11

20 Q Was that an unusual text to get from your 16:40:12

21 brother? 16:40:15

22 MS. VASQUEZ: Objection; vague. 16:40:15

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1 THE WITNESS: I don't -- I don't know what 16:40:27
2 the context is. Sorry. 16:40:28
3 BY MR. TREECE: 16:40:40
4 Q I'm going to direct you to page 59. 16:40:40
5 A Okay. 16:40:45
6 Okay. 16:41:27

IU; R; 7 Q And if you'll take a look in the middle of 16:41:28
H; IR; 8 page 59, which is Bates number 11298, the number 16:41:31
MS; AR; 9 is -- of the chat -- well, I guess this is of the 16:41:35
SP; VA; 10 specific message, 52720, chat 562, do you see 16:41:40
AF 11 that? 16:41:46
12 A Yeah. 16:41:47
13 Q And that's a text message -- text message 16:41:48
14 from Stephen Deuters to you, correct? 16:41:52

15 MS. VASQUEZ: Objection; assumes facts. 16:42:00
IU; R; H;

16 THE WITNESS: Yes. 16:42:02
IR; MS; AR; SP;

17 BY MR. TREECE: 16:42:03
VA; AF

IU; R; 18 Q And he says, Hi C. Not sure how much 16:42:03
H; IR; 19 you're aware of right now but I'm at the house 16:42:05
MS; AR; 20 with Kipper and Debbie, who are speaking with JD 16:42:08
SP; VA; 21 and Amber respectively, separately. Obviously 16:42:11
AF 22 things have not calmed down over the last day or 16:42:14

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IU; R; 1 H; IR; SP 2	so. Do you see that?	16:42:16
3	A Yes.	16:42:17
4	Q And this is March 7th, 2015, isn't that	16:42:17
5	right, the text message?	16:42:23
6	A Yes.	16:42:24
7	Q And that's when Johnny and Amber went	16:42:25
8	all -- were in Australia; isn't that right?	16:42:28
9	MS. VASQUEZ: Objection --	16:42:30
10	MS. HICKOX: Objection.	16:42:31
11	MS. VASQUEZ: -- calls for speculation.	16:42:32
12	MS. HICKOX: Join.	16:42:35
13	THE WITNESS: Yeah, I believe that was	16:42:37
14	Australia Days.	16:42:40
15	BY MR. TREECE:	16:42:41
16	Q And do you recall Johnny cut his finger	16:42:41
17	off in Australia and there was a big to-do about	16:42:43
18	that?	16:42:47
19	MS. VASQUEZ: Objection; vague and	16:42:47
20	ambiguous, assumes facts, calls for speculation.	16:42:51
21	MS. HICKOX: Join.	16:42:56
22	MS. VASQUEZ: Lack of foundation.	16:42:57
	BY MR. TREECE:	16:43:03

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1	Q You can answer.	16:43:03
2	A His -- Johnny's finger was cut off, yes.	16:43:07
3	Q All right. And if you'll turn to page 60.	16:43:12
4	And that's Bates number 11299. Are you with me?	16:43:33
5	A Yes.	16:43:36
6	Q And then do you see there's the text chain	16:43:38
7	426 and then there's the text chain 1646, and	16:43:44
8	those are texts that you're -- you're on, correct?	16:43:51
9	So that would start at the second line from the	16:43:58
10	top and the third -- and end with the third line	16:44:00
11	from the bottom. Do you see that?	16:44:03
12	A Yes.	16:44:05
13	Q And so these are all texts that are in	16:44:07
14	March of 2015, correct?	16:44:10
15	MS. VASQUEZ: Assumes facts.	16:44:15
16	THE WITNESS: Yes.	16:44:18
17	BY MR. TREECE:	16:44:20
18	Q And you send a text with the line number	16:44:20
19	29376 to Stephen Deuters on March 8th, 2015 at	16:44:27
20	12:41 p.m. Do you see that? That's the third	16:44:35
21	line from the top.	16:44:47
22	A Yep.	16:44:48

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1	Q And you say, Oh wow. Poor thing. Much	16:44:49
2	more bandaged than I thought. Makes me so sad.	16:44:51
3	And then you go on to say, If he feels okay to	16:44:55
4	then Captain Jack may need an injury. Do you see	16:45:00
5	that?	16:45:03
6	A Yes.	16:45:05
7	Q And that's referring to Johnny's finger	16:45:05
8	injury; isn't that right?	16:45:08
9	MS. VASQUEZ: Objection; calls for	16:45:10
10	speculation, vague, ambiguous.	16:45:12
11	THE WITNESS: Yes.	16:45:22
12	BY MR. TREECE:	16:45:23
13	Q All right. Are you aware that Amber	16:45:24
14	wanted Johnny to enter into a prenuptial agreement	16:45:28
15	but he wouldn't agree to do so?	16:45:32
16	MS. VASQUEZ: Objection; calls for	16:45:35
17	speculation, calls for hearsay, assumes facts.	16:45:36
18	MS. HICKOX: Join.	16:45:41
19	THE WITNESS: No.	16:45:44
20	BY MR. TREECE:	16:45:47
21	Q All right. If you'll take a look at the	16:45:47
22	fourth line from the bottom. This is the one with	16:45:52

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1	the number 71428.	16:45:54
2	A Uh-huh.	16:45:59
3	Q And are you aware that Amber was willing	16:46:00
4	to agree to a postnuptial but Johnny didn't want	16:46:07
5	to agree to that?	16:46:10
6	MS. VASQUEZ: Objection; calls for	16:46:11
7	speculation, hearsay, and assumes facts.	16:46:13
8	MS. HICKOX: Join.	16:46:16
9	THE WITNESS: No.	16:46:17
10	BY MR. TREECE:	16:46:20
R; AF 11	Q And then Johnny texts you on March 8th,	16:46:20
12	2015 telling you to cancel the postnuptial,	16:46:24
13	correct?	16:46:27
14	MS. VASQUEZ: Objection; assumes facts.	16:46:28
R; AF 15	THE WITNESS: Yes, he used those words.	16:46:36
16	BY MR. TREECE:	16:46:37
17	Q And then you, in fact, called the lawyers	16:46:38
18	for Amber and Johnny and discharged them, right?	16:46:41
19	You -- you terminated their relationship with	16:46:45
20	respect to any postnuptial agreement; is that	16:46:47
21	right?	16:46:50
22	MS. VASQUEZ: Objection; vague and	16:46:51

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1	ambiguous, calls -- assumes facts, lack of	16:46:52
2	foundation, calls for hearsay.	16:46:56
3	THE WITNESS: I -- I don't recall that.	16:46:59
4	BY MR. TREECE:	16:47:02
IU; R; 5	Q All right. I'm going to direct you to	16:47:03
H; IR;		
MS; AR; 6	page 61. And do you see on page 61, which is	16:47:05
SP; VA;		
AF; P 7	Bates number 11300, line 29380?	16:47:19
8	A Yes.	16:47:27
9	Q And that's a text from you to Stephen	16:47:28
10	Deuters on March 9th, 2015, correct?	16:47:31
11	A Yes.	16:47:34
12	Q And you say, Just make sure you say you	16:47:35
13	aren't sure how he hurt his hand. Do you see	16:47:40
14	that?	16:47:42
15	A Yes.	16:47:42
16	Q Why did you say that?	16:47:43
17	A I -- I don't recall. I would have to know	16:47:45
18	the context.	16:47:48
19	Q Okay. Do you know any reason why you	16:47:50
20	would have Johnny conceal how he hurt his hand?	16:47:54
21	MS. VASQUEZ: Objection; misstates the	16:47:58
22	document, misstates prior testimony, assumes	16:48:01

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1	facts.	16:48:04
2	MS. HICKOX: Join.	16:48:05
3	MS. VASQUEZ: Argumentative.	16:48:06
4	THE WITNESS: I don't know who Stephen	16:48:11
5	would be talking to that I would suggest that, so	16:48:13
6	I don't know.	16:48:15
IU; R; 7	BY MR. TREECE:	16:48:16
H; IR;	Q But you did suggest that, didn't you?	16:48:16
MS; AR; 8		
SP; VA;		
AF; P 9	MS. VASQUEZ: Objection; argumentative,	16:48:18
10	badgering, asked and answered, assumes facts,	16:48:20
11	misstates the testimony and the document.	16:48:24
IU; R; 12	MS. HICKOX: Join.	16:48:27
H; IR;	THE WITNESS: I did write that.	16:48:31
MS; AR; 13		
SP; VA;		
AF; P 14	BY MR. TREECE:	16:48:36
IU; R; 15	Q All right. I'm going to view what is	16:48:36
H; IR;		
MS; AR; 16	marked as Exhibit 7, and I'll also pull that up on	16:48:40
SP; VA;		
AF; P 17	the share screen.	16:48:51
18	(Exhibit 7 was marked for identification	16:48:52
19	and is attached to the transcript.)	16:49:15
20	BY MR. TREECE:	16:49:15
21	Q Let me know when you're ready.	16:49:15
22	A Okay.	16:52:48

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IU; R; 1 H; IR; MS; 2 AR; SP; 3 VA; AF; P 4	Q Ms. Dembrowski, this is an E-mail you received from David Kipper on August 18th, 2014 with the subject line Update, is it not? A Yeah.	16:52:49 16:52:52 16:52:56 16:53:02
5 6 7	Q And the update there is with respect to Dr. Kipper's treatment of -- of Johnny's drug and alcohol abuse; isn't that right?	16:53:03 16:53:07 16:53:11
8 9 10 11	MS. VASQUEZ: Objection; assumes facts, calls for hearsay, misstates the document, calls for speculation. MS. HICKOX: Join.	16:53:14 16:53:18 16:53:21 16:53:23
IU; R; 12 H; IR; MS; AR;13 SP; VA; AF; P 14	THE WITNESS: It's in reference to -- it's in reference to a medication, yes, that he was taking.	16:53:33 16:53:40 16:53:42
15 16 17	BY MR. TREECE: Q All right. I think we're going to flesh that out a bit.	16:53:44 16:53:45 16:53:46
IU; R; 18 H; IR; MS; AR;19 SP; VA; AF; P 20 21	All right. Do you recall that Dr. Kipper and his nurse went to the Bahamas with Amber and Johnny to try to curb his addictions to drug and alcohol?	16:53:47 16:53:51 16:53:55 16:54:00
22	MS. VASQUEZ: Objection; assumes facts,	16:54:01

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1	calls for speculation, lack of foundation.	16:54:03
IU; R; 2 H; IR; 2 MS; AR; 3 SP; VA; 3 AF; P 4	THE WITNESS: Yes, regarding the -- the medication that I spoke of, yes.	16:54:11 16:54:15
4	BY MR. TREECE:	16:54:17
IU; R; 5 H; IR; 6 MS; AR; 6 SP; VA; 7 AF; P 7	Q All right. And you keep saying medication. I mean, you previously sent him those texts that say stop alcohol, stop coke, stop -- maybe it said stop prescription, I'll have to look back at it. But you previously sent him a text that said stop drinking, stop coke, stop pills, correct?	16:54:18 16:54:19 16:54:22 16:54:27 16:54:30 16:54:32 16:54:36
12	MS. VASQUEZ: Objection; asked and	16:54:37
13	answered, assumes facts.	16:54:39
IU; R; 14 H; IR; 15 MS; AR; 15 SP; VA; 16 AF; P 16	THE WITNESS: Yes, but I -- I need -- I would need more context to know why I sent those, so...	16:54:44 16:54:47 16:54:50
17	BY MR. TREECE:	16:54:50
IU; R; 18 H; IR; 19 MS; AR; 19 SP; VA; 20 AF; P 20	Q Right. But you knew he was using coke, correct?	16:54:50 16:54:52
21	MS. VASQUEZ: Objection; calls for speculation, calls for hearsay, vague.	16:54:53 16:54:54
IU; R; 22 H; IR; 23 MS; AR; 23 SP; VA; 24 AF; P 24	THE WITNESS: The concern was the	16:55:03

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IU; R; H; IR; MS; AR; SP; 1 VA; AF; P 2	prescription medication. BY MR. TREECE:	16:55:05 16:55:06
IU; R; 3 H; IR; MS; 4 AR; SP; 5 VA; AF; P 6	Q All right. So if we take a look at this -- this E-mail from Dr. Kipper to you with the subject line Update, he says, They evidently had a fight. She claims he pushed her and she asked him to leave the house. Dr. Kipper informed you of that, correct?	16:55:06 16:55:09 16:55:11 16:55:15 16:55:18 16:55:20
9 10	MS. VASQUEZ: Objection; form, calls for hearsay.	16:55:21 16:55:27
IU; R; 11 H; IR; MS; AR; 12 SP; VA; AF; P 13	THE WITNESS: Dr. Kipper is telling me what Amber said to him, yes. BY MR. TREECE:	16:55:32 16:55:34 16:55:35
14 15 16 17	Q And that didn't surprise you, that they had a fight and there was allegations that Johnny pushed her and asked her to leave the house; is that -- is that fair?	16:55:35 16:55:37 16:55:40 16:55:43
18 19 20	MS. VASQUEZ: Objection; calls for speculation, misstates prior testimony, assumes facts, calls for hearsay, argumentative.	16:55:44 16:55:46 16:55:49
21 22	MS. HICKOX: Join. THE WITNESS: It wouldn't surprise me that	16:55:54 16:56:01

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IU; R;
H; IR;
MS;
AR;
SP;
VA;
AF; P

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1 culture, and has no accountability for his 16:57:09

2 behaviors. Dr. Kipper told you that, did he not? 16:57:11

3 MS. VASQUEZ: Objection; assumes facts, 16:57:14

4 calls for hearsay. 16:57:15

IU; R; 5 THE WITNESS: That's what Dr. Kipper 16:57:36

H; IR; wrote. I'm a little bit unclear at the moment his 16:57:38

MS; AR; 6 references, but... 16:57:41

SP; VA; 7

AF; P

8 BY MR. TREECE: 16:57:43

IU; R; 9 Q All right. And then he goes on to say on 16:57:43

H; IR; the next page, this is 11488, He, referring to 16:57:47

MS; AR; 10 Depp, has fundamental issues with anger. Do you 16:57:52

SP; VA; 11 see that? 16:57:55

AF; P 12

13 A Yes. 16:57:56

14 Q And you understood that to be the case 16:57:57

15 yourself because he's your brother, right? 16:57:59

16 MS. VASQUEZ: Objection; misstates prior 16:58:02

17 testimony, calls for speculation, assumes facts, 16:58:05

18 lack of foundation, argumentative. 16:58:08

19 MS. HICKOX: Join. 16:58:10

20 THE WITNESS: No, I don't understand that 16:58:13

21 to be the case with my brother. 16:58:15

22 BY MR. TREECE: 16:58:17

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IU; R; 1 H; IR; MS; AR; 2 SP; VA; AF; P 3	Q All right. But now you have a doctor telling you that Johnny has fundamental issues with anger, correct?	16:58:17 16:58:19 16:58:22
4 5 6	MS. VASQUEZ: Objection; misstates the document, assumes facts, hearsay, it's vague and ambiguous.	16:58:24 16:58:26 16:58:31
IU; R; H; IR; MS; AR; 7 SP; VA; AF; P 8	THE WITNESS: He -- he wrote those words, but...	16:58:37 16:58:39
9	BY MR. TREECE:	16:58:40
IU; R; 10 H; IR; MS; AR; 11 SP; VA; AF; P 12	Q And -- and you hired him to help Johnny, did you not? A I did. Well, I helped with that.	16:58:41 16:58:43 16:58:44
13 14 15 16 17 18 19	Q And so he's giving you an update and he's telling you, Look, he's got problems with drugs, he has no accountability, he romanticizes the entire drug culture, and he has fundamental issues with anger. He provides notice to you on the job you hired him to do of what his views of Johnny's issues are in this update; isn't that right?	16:58:48 16:58:51 16:58:54 16:58:57 16:59:00 16:59:04 16:59:08
20 21 22	MS. VASQUEZ: Objection; misstates the document, compound, calls for hearsay, calls for a medical opinion, calls for speculation.	16:59:11 16:59:13 16:59:19

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1	MS. HICKOX: Join.	16:59:22
2	THE WITNESS: Excuse me.	16:59:29
3	He does write those things, but it becomes	16:59:30
4	more clear in conversation, you know, better --	16:59:41
5	you know, more clear description on the issues.	16:59:45
6	BY MR. TREECE:	16:59:50
7	Q So what -- what conversation are you -- do	16:59:50
8	you actually -- even though you didn't recall any	16:59:52
9	prior conversation, do now you recall a specific	16:59:54
10	conversation with Kipper?	16:59:56
11	MS. VASQUEZ: Objection; argumentative,	16:59:58
12	badgering, misstates her prior testimony.	17:00:00
13	MS. HICKOX: Join.	17:00:06
14	THE WITNESS: I'm not saying I recall a	17:00:07
15	specific conversation with Kipper.	17:00:08
16	BY MR. TREECE:	17:00:12
17	Q All right. And then on 1148 Dr. Kipper	17:00:12
18	goes on to say, There's also an issue of patience.	17:00:16
19	He is driven almost reflectively by his id, is	17:00:19
20	quite childlike in his reactions when he does not	17:00:25
21	get immediate satisfaction. Do you see that?	17:00:27
22	A Yes.	17:00:39

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1 Q And would I agree with that 17:00:40
2 characterization, that Johnny is driven by 17:00:43
3 immediate satisfaction and instant gratification? 17:00:46
4 MS. VASQUEZ Objection; vague, calls for 17:00:49
5 a medical opinion. Calls for speculation. 17:00:51
6 THE WITNESS I wouldn't say that as an 17:01:00
7 overall description of him myself, no. 17:01:03
8 BY MR. TREECE: 17:01:07
9 Q Do you know the difference between id, 17:01:07
10 ego, and superego? And I'm asking because he 17:01:09
11 communicated reflexively by his id to you in 17:01:14
12 this -- in this email exchange. 17:01:17
13 MS. VASQUEZ Objection; vague, ambiguous. 17:01:19
14 THE WITNESS I don't understand. I'm 17:01:29
15 sorry. 17:01:30
16 BY MR. TREECE: 17:01:30
17 Q Well, let me ask you this: Are you aware 17:01:31
18 that id in Freudian terms refers to, you know, 17:01:32
19 animalistic, hedonistic behaviors? 17:01:38
20 MS. VASQUEZ Objection; vague and 17:01:41
21 ambiguous, assumes facts. 17:01:43
22 MS. HICKOX Join. 17:01:47

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1	BY MR. TREECE:	17:02:03
2	Q You still need to answer.	17:02:04
3	A Oh, I'm sorry.	17:02:05
4	MS. VASQUEZ: If you understand the	17:02:06
5	question, Ms. Dembrowski.	17:02:07
6	THE WITNESS: I -- I don't really	17:02:09
7	understand the question or the relevance of it,	17:02:11
8	so...	17:02:13
9	BY MR. TREECE:	17:02:13
10	Q Do you know what id refers to in the -- in	17:02:13
11	the way Dr. Kipper used it in the E-mail to you?	17:02:17
12	MS. VASQUEZ: Objection; calls for	17:02:19
13	speculation, unintelligible.	17:02:21
14	THE WITNESS: No, not really.	17:02:37
15	BY MR. TREECE:	17:02:39
16	Q All right. I'm going to show you what is	17:02:40
17	marked as Exhibit 8.	17:02:42
18	MS. HICKOX: Counsel, we've been going for	17:02:46
19	about hour, hour and 15, if you wouldn't mind	17:02:48
20	taking another break.	17:02:51
21	MR. TREECE: Sure.	17:02:52
22	THE VIDEOGRAPHER: Ms. Vasquez, agreed?	17:02:52

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1	MS. VASQUEZ: Fine. Thank you, Drew, for	17:02:55
2	asking.	17:02:57
3	THE VIDEOGRAPHER: Yes, ma'am. Off	17:02:57
4	record, 5:02.	17:02:58
5	(A recess was taken.)	17:03:00
6	THE VIDEOGRAPHER: On record, 5:18.	17:18:37
7	BY MR. TREECE:	17:18:41
8	Q Ms. Dembrowski, do you have personal	17:18:42
9	knowledge of any -- any act of physical violence	17:18:43
10	between Amber or Johnny?	17:18:47
O 11	MS. VASQUEZ: Objection; assumes facts,	17:18:49
12	compound.	17:18:51
13	THE WITNESS: No.	17:18:55
14	BY MR. TREECE:	17:18:57
15	Q Do you have personal knowledge of any	17:18:57
16	emotional abuse, any act of emotional abuse	17:18:59
17	between Amber and Johnny?	17:19:03
O 18	MS. VASQUEZ: Objection; assumes facts,	17:19:04
19	vague.	17:19:07
20	MS. HICKOX: Calls for speculation, expert	17:19:10
21	opinion.	17:19:12
22	THE WITNESS: Personal knowledge, no.	17:19:17

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1	BY MR. TREECE:	17:19:19
2	Q All right. I'm going to show you what	17:19:19
3	we'll mark as Exhibit 8, and then I'm going to	17:19:21
4	share it on the screen.	17:19:34
5	(Exhibit 8 was marked for identification	17:19:35
6	and is attached to the transcript.)	17:19:50
7	BY MR. TREECE:	17:19:50
8	Q Are you with me?	17:19:50
9	A Yes. I'm just trying to --	17:19:51
10	Q It's a one-page invoice that I want to ask	17:19:54
11	you about with reference to Dr. Kipper. Well --	17:19:57
12	MS. HICKOX: It appears to be two pages.	17:20:01
13	BY MR. TREECE:	17:20:01
14	Q -- one and a half.	17:20:01
15	MR. TREECE: Yeah, Ms. Hickox is correct.	17:20:04
16	MS. VASQUEZ: Also misstates the document.	17:20:07
17	It's not an invoice.	17:20:09
18	MR. TREECE: We'll clear that up with	17:20:11
19	testimony.	17:20:13
20	BY MR. TREECE:	17:20:17
21	Q All right. Ms. Dembrowski, you indicated	17:20:18
22	that you were involved in bringing Dr. Kipper on.	17:20:21

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1	Were you involved in making sure that he was paid?	17:20:26
2	MS. VASQUEZ: Objection; misstates the	17:20:31
3	prior testimony.	17:20:33
4	THE WITNESS: No.	17:20:37
5	BY MR. TREECE:	17:20:37
6	Q Are you aware that he was paid for the	17:20:37
7	period of January 1st, 2014 to December 31st, 2016	17:20:41
8	on the order of \$2.3 million?	17:20:49
9	A No.	17:20:53
10	MS. VASQUEZ: Objection; assumes facts --	17:20:54
11	THE WITNESS: Sorry.	17:20:56
12	MS. VASQUEZ: -- lack of foundation, calls	17:20:57
13	for speculation.	17:20:59
14	MS. HICKOX: Join.	17:20:59
15	BY MR. TREECE:	17:21:02
16	Q I'm going to show you what we'll mark as	17:21:02
17	Exhibit 11. I realize we're skipping a little	17:21:05
18	bit, but that's not a problem.	17:21:08
19	(Exhibit 11 was marked for identification	17:21:19
20	and is attached to the transcript.)	17:21:38
21	BY MR. TREECE:	17:21:38
22	Q Ms. Dembrowski, do you have Exhibit 11 in	17:21:38

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1 front of you? 17:21:40

2 A Is it -- is it just one page? I'm trying 17:21:43

3 to get to -- 17:21:46

4 Q It's one page and then the E-mail messages 17:21:47

5 start on the very top of the second page. 17:21:51

6 A Okay. 17:21:58

R; 7 Q Is Exhibit 11 E-mails between you and 17:22:00
F/A;

FSPK; 8 Tracey Jacobs related to Pirates of the Caribbean 17:22:04
H

9 5 on February 26th, 2015? 17:22:09

10 MS. HICKOX: Ms. Dembrowski, please just 17:22:14

11 read the document, too, before you answer. 17:22:15

12 THE WITNESS: I will. 17:22:19

13 BY MR. TREECE: 17:22:50

14 Q And it's short, and I'm going to go 17:22:51

15 through it with me. So are you with me now? 17:22:53

R; F/A; 16 A Yes, I'm just reading it. 17:22:55
FSPK; H

17 Q And I'm going to start you on the second 17:23:03

18 page. It's numbered 19235. Are you with me? 17:23:06

19 A Yes. 17:23:28

R; 20 Q All right. And Tracey Jacobs sends an 17:23:28
F/A;

FSPK; 21 E-mail on February 26th saying, Sean Bailey did 17:23:32
H

22 call me. And Sean Bailey's with Disney; isn't 17:23:35

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R; H; IR	1	that right?	17:23:38
	2	MS. VASQUEZ: Objection; calls for	17:23:39
	3	speculation, vague.	17:23:40
R; H; IR	4	THE WITNESS: Yes.	17:23:44
	5	BY MR. TREECE:	17:23:44
	6	Q And what's Sean Bailey's role at Disney?	17:23:44
	7	MS. VASQUEZ: Calls for speculation.	17:23:48
	8	MS. HICKOX: Join.	17:23:50
	9	MS. VASQUEZ: Vague.	17:23:51
	10	THE WITNESS: I'm not sure of his title.	17:23:52
	11	BY MR. TREECE:	17:23:54
R; H; IR	12	Q He's pretty high up at Disney, is he not?	17:23:54
	13	MS. VASQUEZ: Objection; vague and	17:23:58
	14	ambiguous, asked and answered.	17:23:59
	15	MS. HICKOX: Join. And lacks foundation.	17:24:02
R; H; IR	16	THE WITNESS: Yes.	17:24:06
	17	BY MR. TREECE:	17:24:07
R; H; IR	18	Q And he says, There were 300 extras	17:24:08
	19	yesterday. Disney is going to give him two days	17:24:11
	20	ish to correct the lateness and then there will be	17:24:15
	21	a problem. And then there's a question of was he	17:24:17
	22	at the Foo Fighters last night. Do you see that?	17:24:20

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IU; R; H; IR;	1	A Yes.	17:24:23
MS; AR; SP; VA; AF; P	2	Q And this is in reference to Johnny being	17:24:23
	3	late to the set and not showing up on time,	17:24:25
	4	correct?	17:24:28
	5	MS. VASQUEZ: Objection; assumes facts,	17:24:29
	6	calls for hearsay, calls for speculation.	17:24:31
	7	MS. HICKOX: Join.	17:24:35
IU; R;	8	THE WITNESS: Yes, to lateness, yes.	17:24:49
H; IR;	9	BY MR. TREECE:	17:24:51
MS; AR; SP; VA; AF; P	10	Q And then if you look on the first page of	17:24:51
	11	this exhibit, the second E-mail from the bottom	17:24:54
	12	Tracey Jacobs E-mails and says, It will get ugly	17:24:57
	13	if the lateness doesn't change. Has anyone spoken	17:25:00
	14	to him. Do you see that?	17:25:04
	15	A Yes.	17:25:06
	16	Q And "spoken to him" refers to spoken to	17:25:07
	17	Johnny about his lateness, correct?	17:25:09
	18	MS. VASQUEZ: Objection; calls for	17:25:11
	19	speculation, calls for hearsay.	17:25:12
IU; R; H; IR;	20	THE WITNESS: Yes.	17:25:27
MS; AR;	21	BY MR. TREECE:	17:25:28
SP; VA; AF; P	22	Q And then above that you respond and you	17:25:28

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IU; R; H; IR; MS; AR; SP; VA; AP; P	1 2 3 4	say to Tracey, Anyone as in who? Jerry did last week when he was super late. He himself said he needs to get turned around. Do you see that? A Yes.	17:25:32 17:25:36 17:25:39 17:25:41
---	------------------	--	--

	5	Q And is that Jerry Bruckheimer?	17:25:43
	6	MS. VASQUEZ: Objection; calls for	17:25:46
	7	speculation.	17:25:47
	8	THE WITNESS: I'm not sure.	17:25:51
	9	BY MR. TREECE:	17:25:53

IU; R; H; IR; MS; AR; SP; VA; AP; P	10 11 12 13	Q And what's Jerry Bruckheimer's role with respect to Pirates of the Caribbean 5, if you know? A Producer.	17:25:53 17:25:59 17:26:01 17:26:01
---	----------------------	---	--

	14	Q And do you recall that the producer called	17:26:02
	15	Johnny to address concerns with his lateness?	17:26:06
	16	MS. VASQUEZ: Objection; calls for	17:26:10
	17	speculation, hearsay, assumes facts.	17:26:11
	18	THE WITNESS: I -- I don't recall or know	17:26:18
	19	if Jerry did. I wasn't there.	17:26:22
	20	BY MR. TREECE:	17:26:25
	21	Q Well, you were aware that he was having	17:26:25
	22	issues with being late and acknowledged himself	17:26:27

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1	that he needs to get turned around?	17:26:30
2	MS. VASQUEZ: Objection; vague and	17:26:33
3	ambiguous, assumes facts, calls for speculation.	17:26:35
4	THE WITNESS: It doesn't read that clearly	17:26:55
5	to me in terms of what you're saying.	17:26:56
6	BY MR. TREECE:	17:26:59
7	Q Your E-mail says, He himself said he needs	17:27:00
8	to get turned around. And that's in reference to	17:27:03
9	lateness, correct, and improving and not being	17:27:09
10	late --	17:27:11
11	MS. VASQUEZ: Objection; compound --	17:27:12
12	BY MR. TREECE:	17:27:13
13	Q -- correct?	17:27:14
14	MS. VASQUEZ: Objection; compound, asked	17:27:14
15	and answered, assumes facts, document speaks for	17:27:16
16	itself.	17:27:20
17	THE WITNESS: It does say that. I	17:27:23
18	don't -- but I don't know who he himself is,	17:27:25
19	whether that's Johnny saying that or Jerry saying	17:27:28
20	that.	17:27:32
21	BY MR. TREECE:	17:27:34
22	Q All right. I'm going to show you what	17:27:34

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1	we've marked as 12.	17:27:36
2	(Exhibit 12 was marked for identification	17:27:49
3	and is attached to the transcript.)	17:27:50
4	BY MR. TREECE:	17:27:50
5	Q And this is substantively one page.	17:27:50
6	There's a little bit of a carryover with just the	17:27:52
7	kind of template message that follows E-mails on	17:27:58
8	the second page, but the content is largely on the	17:28:00
9	first page. And let me know when you're with me.	17:28:03
10	A Okay.	17:28:08
IU; R; 11	Q All right. If you'll take a look at the	17:28:46
H; IR;	bottom of Exhibit 12, do you see the E-mail from	17:28:48
MS; 12	Sean Bailey to Tracey Jacobs on February 27th,	17:28:51
AR;	2015, subject Johnny PS?	17:28:54
SP; 13	A Yeah.	17:29:02
VA;	Q And Sean says with respect to Pirates of	17:29:04
AF; P 14	the Caribbean and Johnny, Eight hours late	17:29:08
15	yesterday. We are a day behind on schedule. I've	17:29:10
16	LW for Christi. Thanks. Do you see that?	17:29:14
17	A Yes.	17:29:17
18	Q And then you respond on the 27th right	17:29:18
19	above that and say, Yeah, I will call him. Do you	17:29:21
20		
21		
22		

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IU; R; H; IR; 1 MS; AR; SP; VA;2 AF; P	see that?	17:29:25
	A Yes.	17:29:25
3	Q And you're referring to calling Johnny,	17:29:26
4	correct?	17:29:29
5	MS. VASQUEZ: Objection --	17:29:31
6	THE WITNESS: No.	17:29:33
7	MS. VASQUEZ: -- calls for speculation.	17:29:33
8	BY MR. TREECE:	17:29:36
9	Q Do you know who you're talking about?	17:29:36
10	A I think I'm referring to calling Sean.	17:29:40
IU; R; 11 H; IR; MS; 12 AR; SP; 13 VA; AF; P 14	Q All right. And do you see above that it says, Bruckheimer just called me and said if he's not on time Monday we have a real problem. I don't know what to do. And that's Tracey Jacobs saying that to you; is that right?	17:29:43 17:29:45 17:29:50 17:29:52
15		17:29:55
16	A Yes.	17:30:00
17	Q So Jerry refers to Jerry Bruckheimer,	17:30:01
18	correct?	17:30:05
19	MS. VASQUEZ: Objection; calls for	17:30:05
20	speculation.	17:30:07
IU; R; H; IR; 21 MS; AR; SP; VA;22 AF; P	THE WITNESS: In -- in -- in this particular text Jerry -- the Jerry seems to refer	17:30:13 17:30:17

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IU; R; H; IR; MS; 1	to Jerry Bruckheimer.	17:30:25
AR; SP; 2 VA; AF; P	BY MR. TREECE:	17:30:27
3	Q All right. And then the E-mail right	17:30:27
4	above that at 12:40 p.m. from Tracey, Jerry says	17:30:30
IU; R; 5 H; IR;	he's been late every day at least two hours. He	17:30:34
MS; AR; 6 SP; VA;	also referenced his lateness on Alice 2 and	17:30:38
AF; P 7	Mortdecai, which clearly is out there. Do you see	17:30:44
8	that?	17:30:46
9	A Yes.	17:31:01
10	Q All right. And then you respond at the	17:31:03
11	top and you say, I know all of it and what he	17:31:07
12	needs to do. I think he knows also. Working on	17:31:10
13	how to get him there. Do you see that?	17:31:13
14	A No, I don't actually see that, so...	17:31:30
15	Q All right. So at the very top right below	17:31:32
16	the -- the first E-mail at the top, it's from your	17:31:35
17	Infinitum Nihil address on February 27th at	17:31:42
18	12:50 p.m.	17:31:45
19	A Okay.	17:31:45
20	Q Starts in the second paragraph there. Do	17:31:46
21	you see that?	17:31:53
22	A Yes.	17:31:55

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1	Q And you're talking about you know what	17:31:56
2	Johnny needs to do and you're working to get him	17:31:59
3	there. And the issues that you're referring to	17:32:02
4	are his drug and alcohol abuse, and they're	17:32:04
5	affecting his ability to show up on time; isn't	17:32:08
6	that right?	17:32:10
7	MS. VASQUEZ: Objection; assumes facts,	17:32:11
8	lack of foundation, misstates the testimony, calls	17:32:13
9	for speculation, compound, calls for hearsay.	17:32:16
10	MS. HICKOX: Join.	17:32:20
11	THE WITNESS: No, I'm just referring to	17:32:23
12	getting him there on time.	17:32:25
13	BY MR. TREECE:	17:32:26
14	Q Do you know why he's been late so many	17:32:26
15	times, why that's an issue?	17:32:29
16	MS. VASQUEZ: Objection; calls for	17:32:31
17	speculation on its face.	17:32:33
18	THE WITNESS: I wasn't in Australia to	17:32:38
19	know exactly why he was late.	17:32:44
20	BY MR. TREECE:	17:32:46
21	Q I'm going to show you what's marked as	17:32:46
22	Exhibit 13.	17:32:49

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1	(Exhibit 13 was marked for identification	17:32:56
2	and is attached to the transcript.)	17:33:11
3	BY MR. TREECE:	17:33:11
4	Q And if you'll take a look at Exhibit 13,	17:33:11
5	it's just the one E-mail -- well, two E-mails, but	17:33:13
6	the one at the top doesn't have any content in it.	17:33:16
7	Do you see the E-mail in the middle from John	17:33:19
8	Leshner April 14th, 2015 to Tracey Jacobs, Scott	17:33:22
9	cooper, subject Ummm? Do you see that?	17:33:28
10	A Yes.	17:33:31
IU; R; 11	Q And then Tracey sent this E-mail to you on	17:33:32
H; IR;		
MS; 12	April 15th, 2015, correct?	17:33:34
AR;		
SP; 13	A Yes.	17:33:38
VA;		
AF; P 14	Q And it says, I called you. He didn't show	17:33:39
15	up. Very upsetting. Hopefully he will be there	17:33:42
16	tomorrow. We have to pay for the stage time even	17:33:46
17	if he doesn't come. Do you see that?	17:33:48
18	A Yes.	17:33:50
19	Q And that's referring to Johnny not showing	17:33:51
20	up on set when he's supposed to, correct?	17:33:54
21	MS. VASQUEZ: Objection; calls for	17:33:58
22	speculation, assumes facts, hearsay.	17:33:59

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1	MS. HICKOX: Join.	17:34:03
2	THE WITNESS: Typically stage time would	17:34:06
3	be referencing doing ADR, which we sometimes would	17:34:08
4	set up in between working. So we had a couple of	17:34:13
5	different options.	17:34:18
6	BY MR. TREECE:	17:34:20
7	Q All right. And Johnny didn't show up for	17:34:21
8	that, right?	17:34:23
9	MS. VASQUEZ: Objection; calls for	17:34:26
10	speculation.	17:34:28
11	THE WITNESS: It says that he didn't -- he	17:34:33
12	didn't go on that day but hopefully he will be	17:34:36
13	there tomorrow. We set it for two days,	17:34:38
14	apparently.	17:34:41
15	BY MR. TREECE:	17:34:41
16	Q And it was very upsetting that he didn't	17:34:42
17	show up; isn't that what was conveyed by John	17:34:44
18	Leshner?	17:34:47
19	MS. VASQUEZ: Objection; calls for	17:34:48
20	speculation, misstates the document, assumes	17:34:50
21	facts.	17:34:54
22	THE WITNESS: It -- it does say that, but	17:34:59

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1	you would have to know more context to it.	17:35:02
2	BY MR. TREECE:	17:35:04
3	Q Are you aware that Johnny's career was	17:35:05
4	suffering because of his drug and alcohol use?	17:35:07
5	MS. VASQUEZ: Objection --	17:35:10
6	THE WITNESS: No.	17:35:11
7	MS. VASQUEZ: -- vague and -- sorry,	17:35:12
8	Ms. Dembrowski. I need to interpose a late	17:35:14
9	objection.	17:35:16
10	THE WITNESS: Sorry.	17:35:17
11	MS. VASQUEZ: That's okay. We're all	17:35:18
12	getting tired.	17:35:19
13	Objection; assumes facts, calls for	17:35:20
14	hearsay, assumes facts, lack of foundation, calls	17:35:24
15	for speculation.	17:35:27
16	MR. TREECE: I'll give you all of them.	17:35:29
17	BY MR. TREECE:	17:35:32
18	Q All right. Are you aware that his career	17:35:33
19	around the 2015 time frame was starting to taper	17:35:36
20	off?	17:35:40
21	MS. VASQUEZ: Objection; vague and	17:35:41
22	ambiguous, calls for speculation, assumes facts.	17:35:42

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1	MS. HICKOX: Join.	17:35:46
2	THE WITNESS: I really don't understand	17:35:47
3	that question at all.	17:35:48
4	BY MR. TREECE:	17:35:50
5	Q All right. Did -- that Johnny was having	17:35:51
6	more difficulty getting work from 2015 forward?	17:35:54
7	MS. VASQUEZ: Objection; assumes facts,	17:36:01
8	calls for speculation.	17:36:03
9	MS. HICKOX: Join.	17:36:06
10	THE WITNESS: No.	17:36:08
11	BY MR. TREECE:	17:36:09
12	Q Are you aware that Johnny was in dire	17:36:10
13	financial straits in 2015?	17:36:13
14	MS. VASQUEZ: Objection; calls for a legal	17:36:17
15	conclusion, assumes facts, lack of foundation.	17:36:19
16	MS. HICKOX: Join. And also vague.	17:36:25
17	BY MR. TREECE:	17:36:31
18	Q I'm going to show you what we've marked as	17:36:31
19	Exhibit 18.	17:36:34
20	(Exhibit 18 was marked for identification	17:36:35
21	and is attached to the transcript.)	17:36:45
22	BY MR. TREECE:	17:36:45

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IU; R; H; IR; 1	Q Ms. Dembrowski, if you take a look at	17:36:45
MS; AR; 2	Exhibit 18, is this an E-mail from Tracey Jacobs	17:36:48
SP; VA; 3	to -- well, copied to you saying, Did you tell	17:36:50
AF; P 4	Johnny?	17:36:54
5	A I'm sorry. I was reading.	17:37:00
6	Q Okay. No problem.	17:37:01
IU; R; 7	So Exhibit 18, is this an E-mail from	17:37:02
H; IR;		
MS; 8	Tracey Jacobs where you're copied and it's on	17:37:05
AR;		
SP; 9	September 2nd, 2015?	17:37:09
VA;		
AF; P 10	A I see the E-mail.	17:37:15
11	Q All right. And it says, Subject: Did you	17:37:16
12	tell Johnny. Do you see that?	17:37:18
13	A Yes.	17:37:22
14	Q And then it goes on to say, He needs to	17:37:23
15	make 25 million by the end of the year. What are	17:37:25
16	you doing? I'm in Europe. Do you see that?	17:37:28
17	A Yes.	17:37:30
18	Q And that's in reference to Johnny's dire	17:37:31
19	financial straits in 2015, correct?	17:37:34
20	MS. VASQUEZ: Objection; calls for	17:37:38
21	speculation, vague and ambiguous, calls for a	17:37:39
22	legal conclusion, assumes facts.	17:37:41

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1 MS. HICKOX: Join. 17:37:45

2 THE WITNESS: That's not my conversation. 17:37:46

3 That's between Tracey and -- 17:37:49

4 BY MR. TREECE: 17:37:52

IU; 5 Q And you're copied on that conversation -- 17:37:53
R; H;

IR; 6 A Yeah. 17:37:54
MS;

AR; 7 Q -- about him needing to make 25 million by 17:37:55
SP;

VA; 8 the end of the year, correct? 17:37:57
AF; P

9 A Yes. 17:38:01

10 Q What did you understand that to mean? 17:38:02

11 MS. VASQUEZ: Calls for speculation. 17:38:07

12 THE WITNESS: I -- I don't -- I don't 17:38:11

13 recall what it means, to be honest. 17:38:17

14 BY MR. TREECE: 17:38:21

IU; R; 15 Q All right. I'm going to show you what is 17:38:21
H; IR;

MS; AR; 16 marked as Exhibit 19. 17:38:24
SP; VA;

AF; P 17 (Exhibit 19 was marked for identification 17:38:26

18 and is attached to the transcript.) 17:38:58

19 BY MR. TREECE: 17:38:58

IU; R; 20 Q Ms. Dembrowski, Exhibit 19, is this an 17:38:59
H; IR;

MS; AR; 21 E-mail from Tracey Jacobs to you and others 17:39:02
SP; VA;

AF; P 22 dated -- or and another person dated 17:39:06

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IU; R; H;
IR; MS; 1
AR; SP;
VA; AF; 2P

September 10th, 2015?

17:39:09

A Yes.

17:39:25

3 Q And are you aware that Johnny was in the
4 process of trying to procure a loan to stabilize
5 his finances in or around this time?

17:39:25

17:39:28

17:39:31

6 MS. VASQUEZ: Objection; assumes facts,
7 calls for speculation, vague and ambiguous.

17:39:34

17:39:37

8 THE WITNESS: I don't recall.

17:39:42

9 BY MR. TREECE:

17:39:44

10 Q Are you aware that he had discussions with
11 Bank of America about selling back-ends or there
12 were discussions about selling back-end rights to
13 drum up money for Johnny?

17:39:44

17:39:47

17:39:51

17:39:55

14 MS. VASQUEZ: Objection; calls for
15 speculation, assumes facts, lack of foundation,
16 calls for hearsay.

17:39:57

17:39:59

17:40:03

17 THE WITNESS: I -- I don't recall all
18 conversations.

17:40:06

17:40:08

19 BY MR. TREECE:

17:40:09

20 Q Are you aware that he was having his art
21 collection appraised to try to raise money?

17:40:09

17:40:11

22 MS. HICKOX: Objection; calls for

17:40:23

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1	speculation, lacks foundation, assumes facts.	17:40:24
2	THE WITNESS: I don't recall specifically	17:40:31
3	why he was having his art collection appraised.	17:40:32
4	BY MR. TREECE:	17:40:41
IU; R; H; IR; MS; AR; SP; VA; AF; P	5 Q I'm going to -- I'm going to show you what 6 we've marked as Exhibit 20.	17:40:41 17:40:44
7	(Exhibit 20 was marked for identification	17:40:46
8	and is attached to the transcript.)	17:41:29
9	BY MR. TREECE:	17:41:29
10	Q Ms. Dembrowski, Exhibit 20, are these	17:41:29
IU; R; H; IR; MS; AR; SP; VA; AF; P	11 E-mails from Tracey Jacobs to you on or around -- 12 well, strike that, on February 12, 2016?	17:41:31 17:41:34
13	MS. HICKOX: Objection to the extent it	17:41:43
14	misstates the document.	17:41:45
IU; R; H; IR; MS; AR; SP; VA; AF; P	15 MS. VASQUEZ: Join. 16 THE WITNESS: Yes.	17:41:48 17:41:50
17	BY MR. TREECE:	17:41:53
IU; R; H; IR; MS; AR; SP; VA; AF; P	18 Q And if you look at the E-mail at the 19 bottom from Tracey Jacobs to you, February 12th, 20 2016, it says -- to you and Joel and others, Joel, 21 you really need to speak to him Tuesday to explain 22 that -- the need for him to do a film, even if not	17:41:53 17:41:55 17:42:02 17:42:05 17:42:08

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IU; R; 1	this one. I spoke to the music manager who told	17:42:12
H; IR; 2	me Johnny may gross 100 grand a week for a couple	17:42:15
MS; 3	of weeks max. Do you see that?	17:42:19
AR; 4	A Yes.	17:42:21
5	Q And so this is a reflection again of the	17:42:21
6	dire financial straits that Johnny was in and the	17:42:25
7	need for him to not do the music work that is	17:42:28
8	consuming his time? He needed to do a film, even	17:42:31
9	if it's not the one that was under consideration,	17:42:34
10	correct?	17:42:37
11	MS. VASQUEZ: Objection; calls for	17:42:37
12	speculation, misstates the document, calls for	17:42:38
13	hearsay, assumes facts.	17:42:46
14	MS. HICKOX: Join. It's also vague and	17:42:49
15	compound.	17:42:51
16	THE WITNESS: I wouldn't characterize this	17:42:55
17	as that, no.	17:42:57
18	BY MR. TREECE:	17:42:58
19	Q What would you characterize it as?	17:42:58
20	A I would characterize it more as Tracey	17:43:03
21	wanted him to do bigger -- bigger films as opposed	17:43:05
22	to just the music.	17:43:15

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1	Q Because he needed money, correct?	17:43:16
2	MS. VASQUEZ: Objection; assumes facts,	17:43:18
3	calls for a legal conclusion, calls for	17:43:20
4	speculation.	17:43:22
5	MS. HICKOX: Join.	17:43:23
6	THE WITNESS: Again, I wouldn't	17:43:28
7	characterize this as even that, no.	17:43:29
8	BY MR. TREECE:	17:43:34
9	Q I'm showing you now what is marked as	17:43:34
10	Exhibit 21.	17:43:37
11	(Exhibit 21 was marked for identification	17:43:39
12	and is attached to the transcript.)	17:43:39
13	BY MR. TREECE:	17:43:39
14	Q And this is just a single two-sentence	17:43:39
15	E-mail. Is this an E-mail from Tracey Jacobs to	17:43:44
16	Joel, subject line The tour, dated March 7th,	17:43:51
17	2016?	17:43:56
18	MS. VASQUEZ: Objection; calls for	17:43:56
19	speculation. The witness is not copied on this	17:43:58
20	E-mail.	17:44:00
21	THE WITNESS: I'm sorry. I was reading	17:44:09
22	it, so would you mind repeating your question?	17:44:11

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1	BY MR. TREECE:	17:44:13
2	Q Yeah. I'll just ask you this: Do you see	17:44:14
3	where it says, Christi just told me J is doing the	17:44:17
4	tour until August? Did you ever E-mail or text	17:44:20
5	him? This flies in the face of what we discussed	17:44:23
6	last week. Do you see that?	17:44:26
7	A I do see that.	17:44:28
8	Q Do you remember discussions about making	17:44:29
9	sure Johnny doesn't do a tour with the band	17:44:30
10	because he needed money and needed to be doing	17:44:33
11	films?	17:44:35
12	MS. VASQUEZ: Objection; assumes facts,	17:44:35
13	compound, vague and ambiguous, calls for hearsay.	17:44:37
14	MS. HICKOX: Join.	17:44:43
15	THE WITNESS: I don't recall a	17:44:48
16	conversation being that -- for that specifically,	17:44:51
17	no.	17:44:54
18	BY MR. TREECE:	17:45:07
R 19	Q All right. I'm showing you now what's	17:45:08
20	been marked as Exhibit 22.	17:45:10
21	(Exhibit 22 was marked for identification	17:45:11
22	and is attached to the transcript.)	17:45:12

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1	BY MR. TREECE:	17:45:12
IU; R; 2 H; IR; MS; AR; 3 SP; VA; AF; P 4	Q Is this an E-mail from Tracey Jacobs with -- March 9th, 2016 with a copy to you, subject line Turkish air?	17:45:12 17:45:16 17:45:19
5	MS. HICKOX: Objection to the extent it	17:45:25
6	misstates the document in that other people are	17:45:26
7	also cc'd.	17:45:30
IU; R; 8 H; IR; MS; AR; 9 SP; VA; AF; P 10	MS. VASQUEZ: Join. THE WITNESS: I'm copied on this, yes. BY MR. TREECE:	17:45:31 17:45:41 17:45:42
IU; R; 11 H; IR; MS; AR; 12 SP; VA; AF; P 13	Q And it says, We must get redline contract so Christi can get Johnny and we can have to get signed ASAP. We need to get the 4 million immediately. Please, with a number of expla -- exclamation marks behind it. A I see that.	17:45:43 17:45:45 17:45:49 17:45:52 17:45:56 17:46:00
17	Q And why did Johnny need the 4 million	17:46:01
18	immediately?	17:46:06
19	MS. VASQUEZ: Objection; calls for	17:46:07
20	speculation, assumes facts, calls for hearsay.	17:46:08
21	MS. HICKOX: Join.	17:46:11
22	THE WITNESS: Tracey's trying to get the 4	17:46:19

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1	million immediately.	17:46:21
2	BY MR. TREECE:	17:46:26
3	Q All right. I'm going to show you what's	17:46:27
4	marked as Exhibit 23.	17:46:31
5	(Exhibit 23 was marked for identification	17:46:33
6	and is attached to the transcript.)	17:46:33
7	BY MR. TREECE:	17:46:33
8	Q Ms. Dembrowski, if you take a look at	17:47:15
9	Exhibit 23, is the top of this an E-mail from	17:47:19
10	Tracey Jacobs to you forward The Ginger Man on	17:47:22
11	March 24th, 2016 where Tracey says, How do you	17:47:26
12	want to deal with this? I don't want to get	17:47:30
13	involved with the bank?	17:47:32
14	A I see that.	17:47:34
15	Q And then below that, the E-mail below that	17:47:35
16	she's forwarding says, Bank of California were	17:47:38
17	talking about a loan against personal security	17:47:42
18	from Johnny, which obviously we can't allow. Do	17:47:44
19	you see that?	17:47:46
20	A Yes.	17:47:47
21	Q Why was Johnny needing a loan and --	17:47:47
22	strike that.	17:47:53

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1	Why was Johnny needing a loan in 2016?	17:47:53
2	MS. VASQUEZ: Objection; calls for	17:47:56
3	speculation, assumes facts, asked and answered.	17:47:58
4	MS. HICKOX: Join.	17:48:04
5	THE WITNESS: This isn't a loan for	17:48:06
6	Johnny. This is a loan for a project.	17:48:07
7	BY MR. TREECE:	17:48:09
8	Q What project is that?	17:48:09
9	A The Ginger Man.	17:48:11
10	Q And did you get involved with the bank for	17:48:16
11	that project?	17:48:19
12	MS. VASQUEZ: Objection; vague.	17:48:21
13	THE WITNESS: No. This is when we were	17:48:25
14	trying to -- we were trying to fund the filming,	17:48:27
15	and this was a suggestion that wasn't going to	17:48:32
16	work out.	17:48:35
17	BY MR. TREECE:	17:48:38
18	Q I asked you earlier about Keenan Wyatt.	17:48:39
19	Do you know Mr. Wyatt?	17:48:41
20	A Yes.	17:48:43
21	Q How -- what is his -- how do you know him?	17:48:45
22	A I've known him. He's worked with us for	17:48:50

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R; P; FSPK; 1 SP; VA; AR; AF; 2 H	many years.	17:48:55
3	Q And he works with Johnny?	17:48:55
4	MS. VASQUEZ: Objection; vague and	17:48:57
5	ambiguous, calls for speculation.	17:48:58
6	MS. HICKOX: Join.	17:49:02
7	THE WITNESS: Yes.	17:49:03
8	BY MR. TREECE:	17:49:03
R; P; FSPK; SP; VA; AR; AF; H	Q And are you aware that Keenan would read	17:49:03
9	Johnny's lines to him through an earpiece?	17:49:07
10	MS. VASQUEZ: Objection; calls for	17:49:11
11	speculation, assumes facts, hearsay.	17:49:12
12	MS. HICKOX: Join.	17:49:16
R; P; FSPK; SP; VA; AR; AF; H	THE WITNESS: Keenan played music.	17:49:19
13	BY MR. TREECE:	17:49:23
14	Q That's not my question. Are you aware	17:49:23
15	that Keenan would read Johnny's lines when he was	17:49:25
16	on set to him through an earpiece?	17:49:29
17	MS. VASQUEZ: Asked and answered,	17:49:32
18	badgering.	17:49:34
19	MR. TREECE: Not answered, but...	17:49:38
20	BY MR. TREECE:	17:49:40
21	Q So you can answer.	17:49:40
22		

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1	MS. VASQUEZ: Asked and answered.	17:49:42
2	THE WITNESS: Keenan -- Keenan played	17:49:46
3	music through the earpiece. If Johnny needed a --	17:49:48
4	a reminder of anything, he could ask.	17:49:52
5	BY MR. TREECE:	17:49:55
6	Q And Johnny did ask and Keenan did read	17:49:56
7	lines, correct?	17:49:58
8	MS. VASQUEZ: Objection; vague, ambiguous,	17:50:00
9	calls for speculation, asked and answered.	17:50:04
10	THE WITNESS: I'm not part of their	17:50:09
11	day-to-day working together, so...	17:50:10
12	BY MR. TREECE:	17:50:14
13	Q Have you ever been asked to pay for	17:50:15
14	property damage caused by Johnny when he was on a	17:50:18
15	job or project or staying elsewhere?	17:50:23
16	MS. VASQUEZ: Objection; vague and	17:50:27
17	ambiguous, assumes facts, lack of foundation,	17:50:28
18	unintelligible.	17:50:31
19	MS. HICKOX: Join. And also compound.	17:50:32
20	THE WITNESS: I'm sorry?	17:50:40
21	BY MR. TREECE:	17:50:41
22	Q I'll rephrase it. Have you ever been	17:50:41

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1	responsible for paying for property damage that	17:50:44
2	Johnny caused, paying a third party for property	17:50:46
3	damage that Johnny caused?	17:50:50
4	MS. VASQUEZ: Same objections.	17:50:52
5	THE WITNESS: I don't recall specifically	17:50:55
6	being in charge of paying for property damage that	17:50:59
7	Johnny caused.	17:51:02
8	BY MR. TREECE:	17:51:04
R; VA; 9	Q Are you aware of payments for property	17:51:04
AF; SP	10 damage caused in Australia?	17:51:07
11	MS. VASQUEZ: Objection; vague and	17:51:10
12	ambiguous, assumes facts, calls for speculation.	17:51:11
13	MS. HICKOX: Join.	17:51:17
R; VA; 14	THE WITNESS: I'm aware that there was	17:51:21
AF; SP	15 some damage.	17:51:22
16	BY MR. TREECE:	17:51:24
17	Q And are you -- who paid for that damage?	17:51:24
18	MS. VASQUEZ: Objection; calls for	17:51:27
19	speculation, assumes facts.	17:51:29
20	MS. HICKOX: Join.	17:51:31
21	THE WITNESS: I didn't pay for it. I	17:51:39
22	don't -- I don't -- I wasn't involved in the	17:51:44

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1	payment, so I don't know.	17:51:46
2	BY MR. TREECE:	17:51:48
3	Q Are you aware of payments for property	17:51:48
4	damage caused in Hicksville at the trailer park?	17:51:50
5	MS. VASQUEZ: Objection; assumes facts,	17:51:55
6	calls for speculation, vague and ambiguous.	17:51:56
7	MS. HICKOX: Join.	17:52:00
8	THE WITNESS: No, I'm not.	17:52:01
9	BY MR. TREECE:	17:52:06
10	Q When is the last time you spoke with	17:52:07
11	Mr. Depp?	17:52:09
12	A I'm not -- I'm not sure.	17:52:17
13	Q How often do you speak with him typically,	17:52:21
14	if you can give me sort of a general sense?	17:52:24
15	MS. VASQUEZ: Objection; vague as to time.	17:52:27
16	THE WITNESS: We -- we speak occasionally	17:52:31
17	and we, you know, text to keep in touch with, you	17:52:34
18	know, family.	17:52:37
19	BY MR. TREECE:	17:52:39
20	Q And you received a document subpoena in	17:52:40
21	connection with this case; isn't that right?	17:52:42
22	A Yes.	17:52:47

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1	MS. VASQUEZ: Calls --	17:52:48
2	THE WITNESS: Sorry.	17:52:50
3	BY MR. TREECE:	17:52:50
4	Q Did you provide to any counsel your text	17:52:51
5	messages with Johnny?	17:52:54
6	MS. VASQUEZ: Objection; that calls for a	17:52:57
7	legal conclusion and potentially it violates the	17:53:00
8	attorney-client privilege. But I'll let	17:53:02
9	Ms. Hickox state those objections.	17:53:05
10	MS. HICKOX: I join those objections.	17:53:08
11	Ms. Dembrowski, if you can answer those	17:53:11
12	questions -- that question without revealing any	17:53:12
13	communications that you had with me or anyone at	17:53:15
14	Stalwart Law Group, then you can do so.	17:53:17
15	THE WITNESS: I -- I provided what I was	17:53:22
16	asked to provide.	17:53:25
17	BY MR. TREECE:	17:53:27
18	Q Did you provide the text messages that	17:53:27
19	you've had with Johnny?	17:53:29
20	MS. VASQUEZ: Same objections.	17:53:32
21	THE WITNESS: If they were relevant to	17:53:38
22	what I was to provide. I don't recall everything	17:53:40

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1	I provided.	17:53:44
2	BY MR. TREECE:	17:53:45
3	Q You're not -- let me ask you this: Did we	17:53:46
4	see today any of the text messages that you	17:53:49
5	believe you provided, if any?	17:53:52
6	MS. VASQUEZ: Objection; vague.	17:53:55
7	BY MR. TREECE:	17:54:02
8	Q You can answer.	17:54:02
9	A No, I don't recall those text messages,	17:54:07
10	so...	17:54:09
11	Q Do you recall assembling text messages,	17:54:10
12	texts between you and Johnny, to provide in	17:54:14
13	connection with this case?	17:54:16
14	A Yes, I recall providing all communications	17:54:21
15	within the scope of what I was asked to provide,	17:54:28
16	you know.	17:54:31
17	Q And I'm asking specifically about text	17:54:32
18	messages. And do you recall specifically	17:54:34
19	assembling text messages between you and Johnny to	17:54:37
20	provide in connection with this case?	17:54:40
21	A I did all text messages.	17:54:43
22	Q Did you talk with Mr. Depp before he filed	17:54:58

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1	the case in the UK against The Sun?	17:55:02
2	MS. VASQUEZ: Objection; vague.	17:55:06
3	THE WITNESS: I'm -- I'm sure I spoke with	17:55:12
4	him.	17:55:14
5	BY MR. TREECE:	17:55:14
6	Q Did you speak with him about whether it	17:55:14
7	was wise to file suit against The Sun in the UK?	17:55:17
8	A I don't recall --	17:55:21
9	MS. VASQUEZ: Objection.	17:55:22
10	THE WITNESS: -- speaking to him about	17:55:23
11	that.	17:55:24
12	Sorry.	17:55:24
13	BY MR. TREECE:	17:55:25
14	Q Did you speak with him about the Virginia	17:55:25
15	litigation before he filed suit in Virginia?	17:55:27
16	MS. VASQUEZ: Objection; vague.	17:55:32
17	THE WITNESS: I don't -- I don't recall	17:55:40
18	speaking to him about his idea of filing.	17:55:42
19	BY MR. TREECE:	17:55:47
20	Q Did you speak to him about anything in	17:55:48
21	connection with the Virginia case before he filed?	17:55:53
22	MS. VASQUEZ: Objection; asked and	17:55:56

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1	answered, vague and ambiguous.	17:55:58
2	MS. HICKOX: Join.	17:56:00
3	THE WITNESS: I -- I -- I don't recall.	17:56:02
4	BY MR. TREECE:	17:56:04
5	Q Have you spoken with Adam Waldman about	17:56:04
6	the Virginia litigation?	17:56:08
7	MS. VASQUEZ: Objection; vague.	17:56:10
8	THE WITNESS: No, not really.	17:56:23
9	BY MR. TREECE:	17:56:26
10	Q What do you mean "not really"?	17:56:26
11	MS. VASQUEZ: Argumentative.	17:56:27
12	THE WITNESS: Sorry.	17:56:33
13	I had someone reach out to me that I had	17:56:34
14	to refer to him.	17:56:42
15	BY MR. TREECE:	17:56:47
16	Q And who was that?	17:56:47
17	A Jennifer Howell.	17:56:51
18	Q And what did Jennifer Howell say to you?	17:56:54
19	MS. VASQUEZ: Calls for hearsay.	17:56:59
20	THE WITNESS: Jennifer had called me	17:57:09
21	because she had realized some information that was	17:57:10
22	in the UK court that she knew to be incorrect.	17:57:17

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1	BY MR. TREECE:	17:57:29
2	Q And how did she reach out to you, by text?	17:57:30
3	A I -- I don't recall. I believe by phone	17:57:39
4	maybe. I don't recall.	17:57:42
5	Q Have you checked to see if you have a text	17:57:44
6	message from her in reference to what you're	17:57:46
7	talking about now?	17:57:49
8	MS. VASQUEZ: Objection; vague and	17:57:51
9	ambiguous.	17:57:52
10	THE WITNESS: No.	17:57:57
11	BY MR. TREECE:	17:58:08
12	Q I just want to make sure I understand your	17:58:08
13	testimony with respect to Johnny's career	17:58:10
14	trajectory. I mean, you've witnessed his career	17:58:14
15	trajectory since he's, you know, been an actor; is	17:58:16
16	that fair?	17:58:21
17	A Relatively.	17:58:25
18	Q And have you noticed his career tapering	17:58:27
19	off at any point?	17:58:32
20	MS. VASQUEZ: Objection; vague and	17:58:34
21	ambiguous, asked and answered, improper opinion.	17:58:35
22	MS. HICKOX: Join.	17:58:43

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201

1	THE WITNESS: Oh, you're waiting for --	17:59:08
2	I'm sorry. Have I noticed his career --	17:59:10
3	BY MR. TREECE:	17:59:13
4	Q Tapering off at any point.	17:59:13
5	MS. VASQUEZ: Same objections. Also calls	17:59:15
6	for a legal conclusion.	17:59:17
7	THE WITNESS: I -- not until -- not until	17:59:29
8	after allegations -- the false allegations came	17:59:51
9	out. I don't know how else to say it, so...	18:00:01
10	BY MR. TREECE:	18:00:04
11	Q Are you trying to -- strike that.	18:00:04
12	And I just want to -- want to pin that	18:00:08
13	down now. So how did you notice -- well, did you	18:00:14
14	notice his career tapering off in connection with	18:00:18
15	the publication from The Sun in the UK?	18:00:22
16	MS. VASQUEZ: Objection; vague and	18:00:27
17	ambiguous, calls for a legal conclusion, assumes	18:00:29
18	facts.	18:00:34
19	MS. HICKOX: Join.	18:00:36
20	MS. VASQUEZ: Calls for speculation.	18:00:40
21	THE WITNESS: I think the idea of the	18:00:45
22	career tapering off is not necessarily something I	18:00:46

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1	can speak to but the -- the idea of, you know,	18:00:52
2	false allegations, headlines, things like that.	18:01:02
3	BY MR. TREECE:	18:01:06
4	Q Well, I think we've -- we've discussed	18:01:06
5	that you don't have personal knowledge about those	18:01:07
6	issues; isn't that right?	18:01:10
7	MS. VASQUEZ: Objection; argumentative,	18:01:12
8	vague and ambiguous, misstates prior testimony.	18:01:14
9	MS. HICKOX: Join.	18:01:18
10	THE WITNESS: I'm sorry. I don't	18:01:21
11	understand that question.	18:01:23
12	BY MR. TREECE:	18:01:24
13	Q How do you have personal knowledge -- or	18:01:24
14	do you have personal knowledge that any of those	18:01:26
15	allegations that you're referencing are false?	18:01:30
16	MS. VASQUEZ: Objection; vague and	18:01:34
17	ambiguous, assumes facts.	18:01:35
18	MS. HICKOX: Also compound.	18:01:40
19	THE WITNESS: I know that they're not	18:01:45
20	true.	18:01:47
21	BY MR. TREECE:	18:01:48
22	Q And how do you know that?	18:01:48

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1	A I know that from just as we went through	18:01:59
2	life that, you know, he was none of the, you know,	18:02:08
3	things he was accused of.	18:02:13
4	Q Yeah. And that's a really general	18:02:17
5	statement. You're saying that you know they're	18:02:19
6	not true, and I'm trying to figure out how you	18:02:21
7	know they're not true. Like, what -- what did you	18:02:24
8	see or witness that leads you to conclude they're	18:02:26
9	not true?	18:02:29
10	MS. VASQUEZ: Objection; calls for a	18:02:30
11	conclusion, vague and ambiguous, argumentative,	18:02:32
12	compound.	18:02:36
13	MS. HICKOX: Join. And also calls for a	18:02:39
14	narrative.	18:02:41
15	MS. VASQUEZ: And unintelligible.	18:02:42
16	THE WITNESS: I think I'm close enough to	18:03:11
17	the situation and the people to understand that	18:03:19
18	things weren't necessarily true.	18:03:28
19	BY MR. TREECE:	18:03:30
20	Q And what I'm trying to find out is how you	18:03:30
21	know that. You're giving a general statement of I	18:03:33
22	just -- I just know is the way I'm interpreting	18:03:35

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1	it. And I don't mean to be mischaracterizing your	18:03:39
2	testimony on that. I'm just trying to help you	18:03:42
3	understand that I'm looking for specific	18:03:44
4	information as to how you reach your conclusion	18:03:46
5	that -- and that's what I'm asking you to provide.	18:03:49
6	So what specific information do you	18:03:52
7	have -- strike that.	18:03:57
8	I mean, what did you see or witness that	18:03:59
9	would lead you to conclude allegations that you're	18:04:00
10	referencing are not true?	18:04:05
11	MS. VASQUEZ: Objection; asked and	18:04:07
12	answered, badgering, calls for a legal conclusion,	18:04:09
13	vague and ambiguous.	18:04:19
14	THE WITNESS: I'm -- excuse me.	18:04:25
15	It -- generalizing all of the allegations,	18:04:27
16	you know, seems to be what you're doing. I can't	18:04:34
17	be specific to each instant anything.	18:04:38
18	BY MR. TREECE:	18:04:45
19	Q Well, let's do this: What specific	18:04:45
20	allegation do you think has been made -- give me	18:04:47
21	an example. I'm not asking for an exhaustive	18:04:51
22	list. I'm not trying to get overbroad. But can	18:04:54

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1	you think of a specific allegation that you know	18:04:56
2	of that's not true and give me the personal	18:04:58
3	knowledge that you have as to why that's not true?	18:05:01
4	MS. VASQUEZ: Objection; asked and	18:05:04
5	answered. I mean, this is -- this is -- this is	18:05:05
6	highly inappropriate, counsel. This is -- you're	18:05:13
7	badgering the witness.	18:05:16
8	MR. TREECE: I'm not badgering the	18:05:17
9	witness. I'm -- this is a discovery deposition.	18:05:19
10	I'm trying to discover what she knows. I'm	18:05:21
11	entitled to do that.	18:05:23
12	MS. VASQUEZ: Okay. You're not entitled	18:05:25
13	to badger the witness. You're not entitled --	18:05:27
14	MR. TREECE: I'm not badgering the	18:05:28
15	witness. I'm trying to drill down to what she	18:05:30
16	claims she knows, and I'm trying to figure out the	18:05:32
17	basis for that assertion. And I'm entitled to do	18:05:34
18	that. We don't need to continue there.	18:05:37
19	And could the court reporter please read	18:05:37
20	that back.	18:05:39
21	MS. VASQUEZ: I am going to state my	18:05:39
22	objections on the record and not be interrupted by	18:05:41

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1	you, Mr. Treece. I know you like to do that, but	18:05:43
2	I'm going to state my objections on the record.	18:05:46
3	You are badgering the witness, highly	18:05:48
4	inappropriately, asked and answered for the fifth	18:05:50
5	time at this point. It's just inappropriate.	18:05:55
6	MR. TREECE: All right. If the court	18:06:01
7	reporter could read back the question, please.	18:06:02
8	Thank you.	18:06:04
9	(The record was read as requested.)	18:06:40
10	MS. VASQUEZ: It's also compound.	18:06:41
11	THE WITNESS: I'm -- I am not going to	18:06:59
12	speak of anything specific because I don't recall	18:07:02
13	specifics. What I know is that over all this time	18:07:05
14	during the time frames of these times none of this	18:07:12
15	was ever brought up, so...	18:07:18
16	BY MR. TREECE:	18:07:24
IU; R; 17	Q Now, we've gone through various text	18:07:25
H; IR; 18	messages between you and Ms. Heard, correct?	18:07:35
MS; 19	A Yes.	18:07:38
AR; 20	Q And in those text message -- messages with	18:07:39
SP; 21	you she brought up allegations of emotional abuse,	18:07:42
VA; 22	did she not?	18:07:47
AF; P		

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1 MS. VASQUEZ: Objection; misstates the 18:07:48
2 testimony, mischaracterizes the documents, assumes 18:07:50
3 facts, calls for hearsay, overly broad, vague and 18:07:54
4 ambiguous. 18:07:58

5 MR. TREECE: I will give you all of them, 18:08:01
6 whatever -- and any others you think of later you 18:08:03
7 can have. That's not a problem. 18:08:05

8 BY MR. TREECE: 18:08:07

9 Q Ms. Dembrowski, can you answer? 18:08:08

IU; R; 10 A She brought up arguments. She brought up 18:08:12
H; IR;

MS; 11 feelings. 18:08:16
AR;

SP; 12 Q And you don't have any personal knowledge 18:08:19
VA;

AF; P 13 to dispute the veracity of her statements and 18:08:21

14 feelings; isn't that right? 18:08:26

15 MS. VASQUEZ: Objection; argumentative and 18:08:28

16 misstates the prior testimony. 18:08:34

IU; R; H; 17 THE WITNESS: I don't have any personal 18:08:42
IR; MS;

AR; SP; 18 knowledge to support them. 18:08:43
VA; AF; P

19 BY MR. TREECE: 18:08:47

IU; R; 20 Q Or rebut them? 18:08:47
H; IR;

MS; 21 MS. VASQUEZ: Argumentative. 18:08:49
AR;

SP; 22 BY MR. TREECE: 18:08:53
VA;

AF; P

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IU; R; 1 H; IR;	Q Correct?	18:08:53
MS; 2 AR;	A Other than no one -- no one around had	18:09:00
SP; 3 VA;	knowledge either. She came to me to talk about	18:09:08
AF; P 4	things. She didn't talk specifically about	18:09:13
5	anything, so...	18:09:19
6	MR. TREECE: All right. I don't think I	18:09:24
7	have any more questions at the moment.	18:09:25
8	Ms. Vasquez may have questions for you; and if she	18:09:29
9	does, I may follow up.	18:09:32
10	MS. VASQUEZ: I do not.	18:09:33
11	MR. TREECE: All right. Well,	18:09:36
12	Ms. Dembrowski, I appreciate your time today, so	18:09:38
13	thank you for appearing. I know depositions are	18:09:41
14	not a ton of fun, but I do appreciate you taking	18:09:44
15	the time.	18:09:47
16	THE VIDEOGRAPHER: Anything else before we	18:09:50
17	close, Ms. Vasquez?	18:09:52
18	MS. VASQUEZ: No. Thank you.	18:09:53
19	MR. TREECE: And I will say just -- I'm	18:09:54
20	not sure what the protocol has been, so I'll go	18:09:56
IU; R; H; IR; MS; 21	ahead and say I would like to admit all of the	18:09:59
AR; SP; VA; AF; 22 P	exhibits that I've added to the Chat into	18:10:01

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1 evidence.

18:10:03

2 MS. VASQUEZ: If there's nothing else,

18:10:05

3 time is 6:10, and this concludes today's

18:10:07

4 deposition of Christi Dembrowski. We're off the

18:10:11

5 record.

18:10:13

6 (The deposition was concluded.)

18:10:14

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1 COMMONWEALTH OF VIRGINIA AT LARGE, to wit:

2 I, Kristi R. Weaver, RPR, an Electronic
3 Notary Public for the Commonwealth of Virginia at
4 Large, of qualification in the Circuit Court of
5 the City of Chesapeake, whose commission expires
6 September 30, 2022, physically located in
7 Chesapeake, Virginia, do hereby certify that
8 CHRISTI DEMBROWSKI was remotely duly sworn by me;
9 was thereupon examined upon her oath by counsel;
10 that her examination was recorded in stenotype by
11 me and reduced to typescript under my direction;
12 and that the foregoing transcript constitutes a
13 true, accurate, and complete transcript.

14 I further certify that I am not related to
15 nor otherwise associated with any party or counsel
16 to this proceeding, nor otherwise interested in
17 the event thereof.

18 Given under my hand and notarial seal at
19 Norfolk, Virginia this 28th day of February, 2022.



21 Kristi R. Weaver
22 Kristi R. Weaver, eNotary 196896
CCR No. 0313158

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