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Transcript of Cornelius Harrell

Date: January 13, 2021

Case: Depp, II -v- Heard

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Transcript of Cornelius Harrell
Conducted on January 13, 2021

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1 2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22	1 2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22	3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22
VIRGINIA: IN THE CIRCUIT COURT FOR FAIRFAX COUNTY ----- x JOHN C. DEPP, II, : Plaintiff, : v. : Civil Action No. AMBER LAURA HEARD, : CL-2019-0002911 Defendant. : ----- x Videotaped Deposition of CORNELIUS HARRELL Conducted Virtually Wednesday, January 13, 2021 4:31 p.m. EST Job No.: 333950 Pages: 1 - 198 Reported By: Paul P. Smakula	APPEARANCES ON BEHALF OF PLAINTIFF DEPP: CAMILLE M. VASQUEZ, ESQUIRE YARELYN MENA, ESQUIRE BROWN RUDNICK, LLP 2211 Michelson Drive 7th Floor Irvine, California 92612 (949) 440-0240 ON BEHALF OF DEFENDANT HEARD: ELAINE CHARLSON BREDEHOFT, ESQUIRE CHARLSON, BREDEHOFT, COHEN & BROWN 11260 Roger Bacon Drive Suite 201 Reston, Virginia 20190 (703) 318-6800 ALSO PRESENT: Amber Heard Jean-Louis Ziesch, Videographer Alex Sussman, Planet Depos Technician	Deposition of CORNELIUS HARRELL, conducted virtually: Pursuant to subpoena, before Paul P. Smakula, Notary Public in and for the State of Maryland.	CONTENTS EXAMINATION OF CORNELIUS HARRELL PAGE By Ms. Bredehoft 7 By Ms. Vasquez 144 By Ms. Bredehoft 173

Transcript of Cornelius Harrell
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2 (5 to 8)

<p>5</p> <p>1 EXHIBITS</p> <p>2 (Attached to transcript.)</p> <p>3 HARRELL DEPOSITION EXHIBITS PAGE</p> <p>4 Exhibit 1 Harrell 7/28/16 Deposition 137</p> <p>5 Exhibit 2 Harrell Subpoena 73</p> <p>6 Exhibit 3 Harrell Witness Statement 101</p> <p>7 Exhibit 4 Emotional Abuse Video 131</p> <p>8 Exhibit 5 5/21/16 9:24 p.m. Picture 88</p> <p>9 Exhibit 6 5/21/16 9:25 p.m. Picture 89</p> <p>10 Exhibit 7 5/21/16 11:57 p.m. Picture 90</p> <p>11 Exhibit 8 Camera 2 5/21/16 91</p> <p>12 Exhibit 9 Heard Picture 94</p> <p>13 Exhibit 10 Heard Image 0145 95</p> <p>14 Exhibit 11 Heard Image 0146 95</p> <p>15 Exhibit 12 Heard Image 0149 95</p> <p>16 Exhibit 13 Heard Image 0177 96</p> <p>17 Exhibit 14 Heard Image 0180 96</p> <p>18 Exhibit 15 Heard Image 0580 97</p> <p>19 Exhibit 16 Heard Image 0598 97</p> <p>20 Exhibit 17 Video of Heard-Harrell 126</p> <p>21 Interaction 5/22/16</p> <p>22</p>	<p>7</p> <p>1 the court reporter please swear in the witness.</p> <p>2 CORNELIUS HARRELL,</p> <p>3 having been duly sworn, testified as follows:</p> <p>4 THE VIDEOGRAPHER: You may start.</p> <p>5 EXAMINATION BY COUNSEL FOR THE DEFENDANT</p> <p>6 BY MS. BREDEHOFT:</p> <p>7 Q Will you please state your name and</p> <p>8 address for the record, please.</p> <p>9 A Cornelius Harrell. My address -- that I</p> <p>10 work at or the address that I live at?</p> <p>11 Q You may use your work address, that's</p> <p>12 fine.</p> <p>13 A Okay. 849 South Broadway, Los Angeles,</p> <p>14 California, and I think it's 90069.</p> <p>15 Q Okay. And I'm not going to ask you for</p> <p>16 your home address, but do you live in the Los</p> <p>17 Angeles area?</p> <p>18 A Correct.</p> <p>19 Q Okay. And what is your date of birth,</p> <p>20 sir?</p> <p>21 A 06/25.</p> <p>22 Q Okay. I'm going to be asking you a series</p>
<p>6</p> <p>1 PROCEEDINGS</p> <p>2 THE VIDEOGRAPHER: It is the beginning of</p> <p>3 media number one of the videotaped deposition of</p> <p>4 Cornelius Harrell in the matter of John Depp II,</p> <p>5 et al. versus Amber Heard, et al. in the Circuit</p> <p>6 Court of Fairfax County, Case No. CL-2019-0002911.</p> <p>7 Today's date is January 13th, 2021. The time on</p> <p>8 the video monitor is 4:31 p.m. Eastern Standard</p> <p>9 Time. The certified videographer today is</p> <p>10 Jean-Louis Ziesch, representing Planet Depos.</p> <p>11 This videotaped deposition is taking place</p> <p>12 remotely. Would counsel please voice yourself --</p> <p>13 I'm sorry -- will counsel please identify yourself</p> <p>14 and state whom you represent.</p> <p>15 MS. BREDEHOFT: Good afternoon. My name</p> <p>16 is Elaine Bredehoff. I represent Amber Laura</p> <p>17 Heard.</p> <p>18 MS. VASQUEZ: Good afternoon. Camille</p> <p>19 Vasquez joined by Yarelyn Mena, representing</p> <p>20 Mr. Depp.</p> <p>21 THE VIDEOGRAPHER: The court reporter is</p> <p>22 Paul Smakula, representing Planet Depos. Would</p>	<p>8</p> <p>1 of questions. If at any time you do not</p> <p>2 understand my question, please let me know that.</p> <p>3 If you respond, I will assume you understood.</p> <p>4 Please be sure to answer the question verbally</p> <p>5 because we have a court reporter. And if you</p> <p>6 shake your head or you nod your head, then that</p> <p>7 will be difficult for the court reporter. From</p> <p>8 time to time, you're going to hear objections by</p> <p>9 the lawyers in this case. What we'd ask you to do</p> <p>10 so that nobody's talking over each other is let</p> <p>11 that lawyer put their objections on and then you</p> <p>12 can answer the question. Just because they've</p> <p>13 objected doesn't mean you can't answer the</p> <p>14 question, they're just trying to preserve their</p> <p>15 objections. Do you understand?</p> <p>16 A Yes.</p> <p>17 Q Okay. Great. What have you done to</p> <p>18 prepare for the deposition today?</p> <p>19 A I'm sorry, I didn't hear you. What did</p> <p>20 you say?</p> <p>21 Q What have you done to prepare for the</p> <p>22 deposition today?</p>

<p>9</p> <p>1 A I didn't really prepare much. I'm just 2 going kind of off of what I remember. It's been 3 such a long time. And I don't feel like it's 4 going to be premeditated [sic] -- or premediated 5 [sic] thoughts, I just feel like I have to come 6 speak my truth and that's it. 7 Q Did you review any document in 8 preparation? 9 A No. 10 Q Did you review any videos or video clips 11 in preparation for the deposition? 12 A I did not. 13 Q Have you spoken with anyone in preparation 14 for the deposition? 15 A I spoke to two colleagues, not about the 16 incident, but I just asked them if they were 17 subpoenaed as well, and that's where the 18 conversation ended. It was a yes at both ends, 19 Alex Romero as well as Trinity, and that's all I 20 had conversations about. 21 Q Did you review any transcripts or witness 22 statements prior to your testimony today?</p>	<p>11</p> <p>1 employer of us that worked there. 2 Q And who owns Tri Provide? 3 A Trinity Esparza. 4 Q And is that to whom you report? 5 A Correct. 6 Q Okay. And can you just explain what 7 concierge services you provide with your -- as you 8 work for the Eastern Columbia Building? 9 A At the Eastern, what you do is we make 10 sure that everything that the residents need in 11 order to further their security and/or living is 12 secure. Some of the daily tasks include just 13 greeting everyone, reconciling the packages 14 when they get mail, as well as ensuring that all 15 of the vendors, which include, like, plumbers, 16 electricians, pool cleaners, and any other 17 maintenance, trash personnel are able to access 18 the building. 19 Q Did you -- when you worked back -- I'm 20 going to go back into the time frame of March 2016 21 through June or July of 2016. Did you perform 22 different services for Eastern Columbia Building</p>
<p>10</p> <p>1 A I did not. 2 Q Have you spoken with Mr. Depp or anyone on 3 his behalf in preparation for this deposition 4 today? 5 A I have not. 6 Q What is your current occupation? 7 A Currently I'm in transition. 8 Q Okay. That's fair. Are you still working 9 at all with Eastern Columbia Building? 10 A I am. 11 Q Okay. In what capacity? 12 A I work on the weekends with Eastern as a 13 concierge front desk person now. 14 Q And how long have you worked with the 15 Eastern Columbia Building? 16 A I've worked for Eastern Columbia for about 17 four years. 18 Q Did you start somewhere around March of 19 2016? 20 A That sounds about right. 21 Q And are you working for Tri Provide? 22 A Yes, that is the third party, which is the</p>	<p>12</p> <p>1 then? 2 A No, not necessarily, but the day-to-day, 3 it's not like specific duties, it changes various 4 based upon residents' needs. The idea is to 5 ensure that the residents have what they need in 6 order to live at their working place or just have 7 a comfortable living. 8 Q And were you working part time back in the 9 March 2016 through May 2016 time frame? 10 A Yes. 11 Q Were you on-call, essentially? 12 MS. VASQUEZ: Objection to form of the 13 question. It's vague and ambiguous as to on-call. 14 MS. BREDEHOFT: I'll rephrase it. 15 Q What types of hours did you have with the 16 Eastern Columbia Building back in the March 17 through May 2016 time frame? 18 A Generally eight-hour shifts. 19 Specifically, more on weekends, emphasis on a 20 Sundays. 21 Q How many tenants or residents were there 22 in the Eastern Columbia Building in the March</p>

R, SP, F/A, Lack of Pers. Know., Improper Opinion	<p>13</p> <p>1 through June 2016 time frame?</p> <p>2 A The building houses a hundred-plus</p> <p>3 residents. I generally usually see 80-plus of</p> <p>4 them. I don't see every single resident, but I</p> <p>5 would say, like, 80 if I had to guess --</p> <p>6 Q When did you say --</p> <p>7 A -- in the building.</p> <p>8 Q I'm sorry, I didn't -- what was the last</p> <p>9 part of that?</p>	<p>15</p> <p>1 time frame March 2016 through June of 2016 again.</p> <p>2 A Probably on occasion. I recall working</p> <p>3 there throughout times where I did -- they did</p> <p>4 need coverage and I was available, I would pick up</p> <p>5 a shift on Wednesdays, on Thursdays, or any days</p> <p>6 that they needed me that I could work.</p> <p>7 Q So how many people did you usually see on</p> <p>8 a daily basis?</p> <p>9 MS. VASQUEZ: Objection. Vague as to</p> <p>10 time.</p> <p>11 MS. BREDEHOFT: Let me rephrase it.</p>	
R, F/A, SP, Lack of Pers. Know., Improper Opinion	<p>10 A I would say 80-plus lived at the building.</p> <p>11 A lot of them are office suites which they don't</p> <p>12 live there.</p> <p>13 Q And when you say a hundred-plus or 80-plus</p> <p>14 residents, is that just the ownership, the number</p> <p>15 of units, or does that include all the people that</p> <p>16 live in each residence as well?</p> <p>17 A It varies. The building houses 140, I</p> <p>18 believe, but owners typically don't live in the</p> <p>19 loft, so I would say during that time it probably</p> <p>20 was 80 occupancy as far as owners go, that's what</p> <p>21 I would see on a daily basis, but there's probably</p> <p>22 140-plus owners of the building.</p>	<p>12 Q In the time frame of March 2016 through</p> <p>13 June of 2016 while you were working as a concierge</p> <p>14 in the Eastern Columbia Building, approximately</p> <p>15 how many people did you see each day?</p> <p>16 A When you say people, are you referring to</p> <p>17 residents who lived there? Owners? Or visitors?</p> <p>18 Vendors?</p> <p>19 Q All of the above.</p> <p>20 A On a typical day you probably see maybe a</p> <p>21 hundred-plus people a day.</p> <p>22 Q Okay. Now, I'm going to ask you about the</p>	R, F/A, SP, Lack of Pers. Know., Improper Opinion
	<p>14</p> <p>1 Q How many of the buildings -- how many of</p> <p>2 the residences of the Eastern Columbia Building</p> <p>3 are office suites?</p> <p>4 A Honestly, I don't know.</p> <p>5 Q And this is -- if I understood you</p> <p>6 correctly, there's 140 owners, so do you recall</p> <p>7 approximately how many of those owners are office,</p> <p>8 commercial-type owners?</p> <p>9 A I do not.</p> <p>10 Q Okay.</p> <p>11 A Again, I only worked there part time, and</p> <p>12 I do something completely different. And I worked</p> <p>13 there four-plus year and every month someone moves</p> <p>14 out, someone moves in. And each owner could live</p> <p>15 there or rent there or do their business there, it</p> <p>16 just changes on a day-to-day basis. And again, my</p> <p>17 shifts aren't as consistent, so I couldn't tell</p> <p>18 you how many offices there were and how many</p> <p>19 residents there were and owners that lived there.</p> <p>20 Q So during -- did you -- you said you</p> <p>21 usually worked Sundays. Did you work during the</p> <p>22 workweek too on occasion? And I'm back in the</p>	<p>16</p> <p>1 types of residents that live there. What were the</p> <p>2 occupations or professions? What kind of range</p> <p>3 did you have of owners and residents at the</p> <p>4 Eastern Columbia Building? And again, I'm talking</p> <p>5 March 2016 through June 2016.</p> <p>6 A Yeah. We have a chef, we have chefs, we</p> <p>7 have doctors, we have costume designers, we have</p> <p>8 musical artists, we also have actors and artists.</p> <p>9 So a range. And a lot of business owners.</p> <p>10 Q I noticed you left out lawyers. Is there</p> <p>11 an exclusion policy?</p> <p>12 A Oh, no, there's lawyers there as well in</p> <p>13 the office. They don't live there, but they</p> <p>14 usually work the office -- I know there's an</p> <p>15 office of lawyers there.</p> <p>16 Q Okay. Are there also people in the</p> <p>17 entertainment field such as makeup artists and</p> <p>18 wardrobe, different types of people that are in</p> <p>19 the entertainment industry but not necessarily</p> <p>20 actors?</p> <p>21 MS. VASQUEZ: Objection; vague as to time.</p> <p>22 A Yes.</p>	

<p>17</p> <p>1 Q Again, we're talking March 2016 to June 2 2016 were there.</p> <p>3 A I could name, like, a costume designer 4 that worked there, and/or wardrobe stylist. I'm 5 not exactly sure about makeup artist during that 6 time period, and a lot of up-and-coming actors, 7 yeah.</p> <p>8 Q Okay. And you said a lot of up-and-coming 9 actors. Were there also relatively established 10 actors in this time frame of March 2016 through 11 June 2016?</p> <p>12 A Yes.</p> <p>13 Q Okay. How many would you say were actors 14 that were in the Eastern Columbia Building in the 15 time frame March 2016 through June 2016?</p> <p>16 A When you say in the building, do you mean 17 living there or just in the building?</p> <p>18 Q Residents? Owners? Visitors?</p> <p>19 A I would -- I know an owner that was, like, 20 a very pronounced actor, hence this whole 21 situation, but there was a lot of actors in and 22 out of that building visiting just because of the</p>	<p>19</p> <p>1 that kind of I remember during that time period.</p> <p>2 Q Do you remember James Franco living in the 3 building during that time frame?</p> <p>4 A The name actually sounds very familiar 5 when looking in the database, but I don't know who 6 that is, actually.</p> <p>7 Q Okay.</p> <p>8 A I probably had interactions with him, and 9 I just -- I'm not -- I'm not aware if he's an 10 actor or not. A lot of the people in that 11 building, to be transparent, do have specifically 12 really well-known careers and I just don't know of 13 them. I mean, I just met one last week and I was 14 just kind of shocked -- he didn't know who -- I 15 didn't know who he was. Just very familiar with 16 me, I'm just not really into that kind of scene.</p> <p>17 Q Okay. The kind of scene, the Hollywood 18 scene, is that what you're talking about?</p> <p>19 A The entertainment industry.</p> <p>20 Q So I'm still back in the March to 21 June 2016 time frame. How many people would 22 typically go through the building lobby in a day?</p>
<p>18</p> <p>1 clientele, whether it be visiting the lawyer, 2 visiting their acting coach, etcetera.</p> <p>3 Q Okay. So there were acting coaches that 4 were also residents at that time?</p> <p>5 A I believe so.</p> <p>6 Q You said that there was a very prominent 7 owner. Who you were referring to?</p> <p>8 A Johnny Depp.</p> <p>9 Q Was Johnny Depp the only prominent actor 10 who was an owner there back in the March 2016 11 through June 2016 time frame?</p> <p>12 MS. VASQUEZ: Objection to the term 13 prominent; it's vague.</p> <p>14 Q I'm using Mr. Harrell's -- Mr. Harrell, 15 I'm using your term, you referred to him as 16 prominent, I believe. Was there anyone else you 17 considered a prominent actor owner other than 18 Johnny Depp in the time frame of March 2016 19 through June 2016 in the Eastern Columbia 20 Building?</p> <p>21 A Well, Amber Heard was -- was -- lived 22 there as well. And yeah, those are the only two</p>	<p>20</p> <p>1 This is different than coming to see you or you 2 seeing them at the concierge desk?</p> <p>3 A So aside from stopping at the desk, just 4 kind of walking through?</p> <p>5 Q Yes.</p> <p>6 A Less. The walk-through traffic is 7 probably, like, 20 to 30 a day without seeing us. 8 So just kind of like avoiding the interaction 9 overall. The majority of the walk-through traffic 10 is vendors who have to stop and communicate with 11 us to get up to where they need to go or workers 12 in the building.</p> <p>13 Q Okay. You had garage parking, correct, in 14 the Eastern Columbia Building back in the 15 March through June 2016 time frame?</p> <p>16 A Yes, we do as staff.</p> <p>17 Q And the people who parked there, were they 18 able to go up to their residences without having 19 to pass through the lobby or pass by the 20 concierge's desk, typically?</p> <p>21 A If they have a fob, yes. If they take the 22 stairs, yes. If not, it would be very difficult</p>

F/A, SP
Vague

R, F/A,
SP, Lack
of Pers.
Know.
Improper
Opinion

<p>21</p> <p>1 to do that.</p> <p>2 Q Well, let's take those one step at a time.</p> <p>3 So the fob means they have access to the elevator;</p> <p>4 is that correct?</p> <p>5 A Yes.</p> <p>6 Q So they could park their car, go to the</p> <p>7 elevator, use the fob, and go up to their</p> <p>8 residence and you would not see them; correct?</p> <p>9 A I'm sorry, say that again?</p> <p>10 Q So if they had a fob and they parked their</p> <p>11 car in the garage, use the fob, they could take</p> <p>12 the elevator up to the residence and you would not</p> <p>13 see them; is that correct?</p> <p>14 A We wouldn't see them personally –</p> <p>15 MS. VASQUEZ: Objection; assumes facts not</p> <p>16 in evidence. I'm sorry, Mr. Harrell. I'm going</p> <p>17 to occasionally make some objections, so if I</p> <p>18 could just ask you -- I don't want to interrupt</p> <p>19 you and I don't want to interrupt Ms. Bredehofs</p> <p>20 flow, but if I could just ask you to wait maybe</p> <p>21 two seconds so that I can get my objections on the</p> <p>22 record, I would very much appreciate that. And if</p>	<p>23</p> <p>1 ambiguous.</p> <p>2 MS. BREDEHOFT: It doesn't matter. Let me</p> <p>3 ask the next question.</p> <p>4 Q So, Mr. Harrell, when you're talking about</p> <p>5 all the individuals that come through and that</p> <p>6 you're seeing that pass through the concierge desk</p> <p>7 and pass through the lobby, were you including the</p> <p>8 people that you just saw on the cameras, the video</p> <p>9 cameras?</p> <p>10 A No. Because they wouldn't come through</p> <p>11 the lobby if we'd just seen them on the video</p> <p>12 camera. And most of the time they go straight up</p> <p>13 to their lofts.</p> <p>14 Q Okay. Now, was there a separate mail room</p> <p>15 for packages that were kept for residents?</p> <p>16 A Yes, there is a package room where we</p> <p>17 house a lot of packages for the residents.</p> <p>18 Q Could you describe for me what that looked</p> <p>19 like and how close it was to the concierge desk?</p> <p>20 A Yeah. It is away from the desk, it's</p> <p>21 around the corner and passed a couple of the</p> <p>22 elevators. And it's to the right in a hallway,</p>
<p>22</p> <p>1 you could extend that courtesy to Ms. Bredehofs</p> <p>2 when I ask you questions, I'm sure she would</p> <p>3 appreciate that as well. So I'm sorry, Elaine, do</p> <p>4 you want to ask the question again or have the</p> <p>5 question read back?</p> <p>6 MS. BREDEHOFT: Can you read it back?</p> <p>7 (Requested portion read back.)</p> <p>8 MS. VASQUEZ: Okay. My objection is</p> <p>9 assumes facts not in evidence.</p> <p>10 Q Is that how the fob worked?</p> <p>11 A Is that for me?</p> <p>12 Q Yes.</p> <p>13 A Okay. Not necessarily. So we wouldn't be</p> <p>14 able to see them personally, but we could see them</p> <p>15 in the elevator. So we will see them, but we</p> <p>16 won't see them face-to-face.</p> <p>17 Q How would you see them in the elevator if</p> <p>18 you're at the concierge desk?</p> <p>19 A There's cameras.</p> <p>20 Q Okay. So that's the security footage that</p> <p>21 you have; correct?</p> <p>22 MS. VASQUEZ: Objection; vague and</p>	<p>24</p> <p>1 and it's kind of a closet, if you will. It houses</p> <p>2 dry cleaning and lots of shelves in order to -- to</p> <p>3 properly store the packages. It has a</p> <p>4 refrigerator and water vendor, water machine in</p> <p>5 there. Nothing too exciting, but it houses a lot</p> <p>6 of residents' packages, and we're often in there</p> <p>7 grabbing packages for residents.</p> <p>8 Q Approximately how much time does it take</p> <p>9 you to walk from the concierge desk to the mail</p> <p>10 room and back?</p> <p>11 A It could take -- it could take less than a</p> <p>12 minute depending on if any conversation is had.</p> <p>13 Most of the majority of the time when we do walk</p> <p>14 to the package room it's not silent, so it's</p> <p>15 usually conversations that -- for me specifically,</p> <p>16 conversations that you're talking to the resident</p> <p>17 and you're walking and talking and you get to the</p> <p>18 closet/the package room, and you open it up and</p> <p>19 there's conversations that happen. So when the</p> <p>20 conversation is long and lengthy it can be</p> <p>21 anywhere from five to ten minutes, but the walk is</p> <p>22 about less than a one-minute walk.</p>

R

25
1 Q Okay. And when you're saying less than a
2 one-minute, is that there and back --
3 A Correct.
4 Q -- if you got the package and came back?
5 A Correct.
6 Q Okay. What would you say the dimensions
7 are of the mail room?
8 A I'm not really good at dimensions. I
9 couldn't even tell you. I know it's a very small
10 room. It's -- I mean, no one could live in that
11 room.
12 Q Well, how about -- let's see if we could
13 do it this way. If you -- if you look at the
14 concierge area, where you are in the concierge
15 desk and there's space behind that, if you took
16 that space, is that larger or smaller than the
17 mail room?
18 A Smaller.
19 Q Okay. And how much -- would you say just
20 a little smaller? Half the size? What are you
21 thinking?
22 A A little smaller.

26
1 Q So it's a little bit smaller, but kind of
2 close to the size that your concierge area is?
3 A Sorry, the package room is bigger than our
4 concierge area. So the concierge area is smaller
5 than the package room.
6 Q Oh, okay. Thank you. I appreciate that
7 clarification. What type of lighting do you have
8 in the mail room?
9 A Fluorescent lighting. It's very bright in
10 there.
11 Q So what -- when you say with fluorescent
12 lighting, what are -- I mean, is it those long
13 fluorescent lights that are on the ceiling? Is it
14 --
15 A Correct.
16 Q Okay. And --
17 A It's not on the type of the ceiling, it's
18 on the side, but it's those bars of lights that
19 are fluorescent lights.
20 Q And where is the dry cleaning kept in
21 relationship to those fluorescent lights?
22 A To the -- to the left of it. So you come

27
1 into the room, the lights are here, and it lights
2 up the room. The dry cleaning is straight ahead,
3 and it's kind of adjacent to the -- the dry
4 cleaning stand.
5 Q And then where are the packages kept?
6 A All around the room.
7 Q And how do you organize the packages so
8 that you can easily find the ones for a particular
9 resident?
10 A Each floor has a designated shelf.
11 Q Okay. So how many shelves are there in
12 the mail room?
13 A Four or five straight down, and then four
14 longways.
15 Q Okay. Are there any video cameras in the
16 mail room?
17 A Package room, yes.
18 Q Okay. And I'm going to ask -- so how many
19 videos are in the package room?
20 A Cameras are in the package room?
21 Q Yes.
22 A Yeah, there's one.

28
1 Q And where is that located?
2 A At the top of the ceiling and into the
3 right. So it's in the room to the right above the
4 light.
5 Q Okay. Now, was that the case back in the
6 March to June 2016 time frame as well?
7 A I don't understand your question.
8 Q I want to make sure because I've been
9 asking you some questions that might make you say
10 present tense as opposed to going back to March
11 2016 through June 2016. Is the description that
12 you have given me of the mail room and all the
13 logistics of the mail room, the lighting and the
14 camera, was that the same back in the time frame
15 of March 2016 through June 2016?
16 A Yes, I believe so. It's changed since
17 then, but before it was kind of like I'm
18 explaining.
19 Q And how has it changed now?
20 A I thought it would be a great idea to
21 change where the dry cleaning is as opposed to
22 where the light is and to add an extra shelf in

<p>29</p> <p>1 there, and they were able to use my ideas and</p> <p>2 revamp the whole room.</p> <p>3 Q So when you were just testifying to where</p> <p>4 the lighting was, where the dry cleaning was, and</p> <p>5 the shelving, was that -- were you talking about</p> <p>6 present tense or were you describing back in the</p> <p>7 March 2016 to June 2016 time frame?</p> <p>8 A Back in the day, back in the time frame</p> <p>9 that you are asking.</p> <p>10 Q Great. So let me talk about the cameras</p> <p>11 for a moment. Approximately how many video</p> <p>12 cameras were used by the Eastern Columbia Building</p> <p>13 back in the time frame of March 2016 through</p> <p>14 June 2016?</p> <p>15 A How many cameras total?</p> <p>16 Q Yes.</p> <p>17 A Probably like 39.</p> <p>18 Q And did you play any role in the review of</p> <p>19 those roughly 39 cameras that were in the Eastern</p> <p>20 Columbia Building during the period March 2016</p> <p>21 through June 2016? And when I say did you play</p> <p>22 any role, I mean did you have any job</p>	<p>31</p> <p>1 looking at all of them at once.</p> <p>2 Q During the period March 2016 through July</p> <p>3 2016, did you ever rewind any of the video footage</p> <p>4 and review any of it?</p> <p>5 A Most likely.</p> <p>6 Q Do you have a recollection of doing that</p> <p>7 ever?</p> <p>8 A Yeah. Not specifically a specific</p> <p>9 example, but I do remember having to ask how to</p> <p>10 use the cameras because I had a situation where I</p> <p>11 had to look back at it, so I do remember during</p> <p>12 that time period reviewing some things.</p> <p>13 Q Do you recall what you looked back at in</p> <p>14 that time frame?</p> <p>15 A Yeah, it was someone's package, how many</p> <p>16 packages they picked up at a certain time.</p> <p>17 Q Okay. Is that the only time you can</p> <p>18 recall in the period March 2016 through July 2016</p> <p>19 that you reviewed video footage, rewound to review</p> <p>20 video footage at the Eastern Columbia Building?</p> <p>21 A Yeah. The only one that kind of rings a</p> <p>22 bell that I remember I had to specifically dig</p>
<p>30</p> <p>1 responsibilities of reviewing those?</p> <p>2 A Yes. I think we all can and have access</p> <p>3 to reviewing the footage. I don't have to review</p> <p>4 it, but we are expected to watch the video live.</p> <p>5 And if we see anything or if any resident has any</p> <p>6 questions or concerns about where a package was or</p> <p>7 where a vendor went or who came into their loft,</p> <p>8 we can rewind the footage and see.</p> <p>9 Q Okay. And so did you during that time</p> <p>10 frame, when you were in the concierge -- at the</p> <p>11 concierge desk, how many cameras were you able to</p> <p>12 look at at the same time?</p> <p>13 A All of them are up on the screen at the</p> <p>14 same time live.</p> <p>15 Q Did you just have one screen and then have</p> <p>16 roughly 39 little pieces in the screen?</p> <p>17 A We had two screens and there's -- you can</p> <p>18 split them up various ways, but for the most part</p> <p>19 you have -- you can have 32 on one screen and more</p> <p>20 on the other. It's up to whoever's preference it</p> <p>21 is. You can also zoom into certain areas that are</p> <p>22 high traffic and only look at certain areas versus</p>	<p>32</p> <p>1 into and write an email about, yes.</p> <p>2 Q Okay. You started to talk a little bit</p> <p>3 about visitors coming to the building. How were</p> <p>4 visitors handled at the Eastern Columbia Building</p> <p>5 in the period March 2016 through July 2016?</p> <p>6 MS. VASQUEZ: I'm going to object to that</p> <p>7 to the form of the question as to vague and</p> <p>8 ambiguous by mean -- "handled."</p> <p>9 Q What was the process when a visitor came</p> <p>10 to the Eastern Columbia Building during the period</p> <p>11 March 2016 through July 2016?</p> <p>12 A The process was different per resident.</p> <p>13 Most of the time it was a call to the actual owner</p> <p>14 or the tenant of the resident, and ensure that</p> <p>15 they were expecting them, and then we often walked</p> <p>16 to the elevator and let them up. We also type in</p> <p>17 their name and keep a dialogue of all the visitors</p> <p>18 each resident had.</p> <p>19 Q So there would be a record of visitors</p> <p>20 that came to visit any resident?</p> <p>21 A Most of the time, yes, if everyone did</p> <p>22 their job correctly, but I do know there's a lot</p>

SP,
Improp
Opinion

<p>33</p> <p>1 of us who didn't always type it in. We are 2 supposed to, but we do call all the time and 3 verbally have the conversation, authorization to 4 let the resident up. 5 Q And how did you go about calling the 6 residents in the time frame March 2016 through 7 July 2016? 8 A We look up their name in the database 9 based upon their unit, we use their phone number, 10 we give them a call, and let them know who's here 11 to visit them. 12 Q And then you would log in the person? 13 A Correct. 14 Q And then if the person -- the resident you 15 called said yes, let them up, what would you do 16 next? 17 A We walked the visitor to the elevator and 18 we fob them up and we let them up to the specific 19 floor. We don't go with them, we just press the 20 buttons for them. 21 Q Are there any occasions where the 22 residents would come down to retrieve the visitor?</p>	<p>35</p> <p>1 fob. 2 Q Do you have a recollection of Amber Heard 3 ever asking to borrow a vendor fob or get an 4 additional fob during the period March 2016 5 through July 2016? 6 A I do. Yes, I do remember a case where she 7 asked for an extra fob from her spare keys. 8 Because we do keep spare keys, and they had a lot 9 of spare keys for each loft. 10 Q I'm a little confused and so I'm going to 11 try to ask this a little bit -- is there a fob 12 that comes from a spare key? 13 A So at the front desk we also house a lot 14 of the residents' spare keys. So, for example, 15 you lost your keys, we house spare keys. And 16 because they owned various lofts, there was about 17 a key for each one. And they can have a fob on 18 those keys. So I remember her asking me is there 19 a fob on one of the other spare keys. And at that 20 moment I was able to look at all her spare keys 21 and say, here goes a fob, and she was able to take 22 one of those fobs.</p>
<p>34</p> <p>1 A Yes. 2 Q Roughly how much -- how many times would 3 the resident come down as opposed to just having 4 you use the fob in that time frame, March 2016 5 through July of 2016? 6 A Less often. That doesn't happen very 7 often. But it does happen. A lot of the people 8 who do come down are the people who may not -- who 9 may work there or be going to a meeting with the 10 specific person, not necessarily wanting to get 11 fobed up. 12 Q Was there any occasion that a resident 13 could just request a fob, a special fob so that 14 the visitor could routinely come and go? 15 A That -- that can be established through 16 Trinity, our supervisor, or the general manager, 17 Brandon, but I didn't have any -- any handlings 18 with that. However, there is the ability to check 19 out a vendor fob, and each resident can come down 20 and say, hey, I have a friend extending their 21 stay, can I borrow a vendor fob? And they can 22 leave some collateral and they're able to borrow a</p>	<p>36</p> <p>1 Q Do you recall approximately when that was? 2 A I don't. 3 Q Was it your understanding that Mr. Depp 4 owned all of the apartments at the penthouse 5 level? 6 MS. VASQUEZ: Objection as to -- vague as 7 to time. His understanding when? 8 Q I'll reask it. Back in the time frame of 9 March 2016 when you began at Eastern Columbia 10 Building through July of 2016, was it your 11 understanding that Mr. Depp owned all of the 12 penthouse residence? 13 A I was told that, yes. 14 Q Okay. And was there any one -- any other 15 owner who owned as much of the property, as many 16 residences as Mr. Depp during that time frame of 17 March through July 2016? 18 A I'm not exactly sure. Not all on the same 19 floor, I don't believe. 20 Q So that was unusual? 21 A Correct. 22 Q And the penthouse was the top floor;</p>

<p>37</p> <p>1 correct?</p> <p>2 A Yes.</p> <p>3 Q Had you ever met Johnny Depp by the time</p> <p>4 period of March 2016 through July 2016?</p> <p>5 A No.</p> <p>6 Q Have you ever met Johnny Depp since then?</p> <p>7 A When you say meet, do you mean like have a</p> <p>8 full conversation or?</p> <p>9 Q Up through the period of July 2016, had</p> <p>10 you ever seen Johnny Depp at the Eastern Columbia</p> <p>11 Building?</p> <p>12 A I – I do recall a time where I'm seen him</p> <p>13 interact with a different person, but I don't –</p> <p>14 haven't, like, really interacted with him.</p> <p>15 Q Who do you recall Johnny Depp interacting</p> <p>16 with that you saw in that time period?</p> <p>17 A I believe it was Trinity. It was when I</p> <p>18 was very, very new to the building. It was like</p> <p>19 first starting and I remember it happening so</p> <p>20 quickly. And I think that was him, and I asked</p> <p>21 her and she was like, yeah, we have those types of</p> <p>22 people, and she kind of smoothed it over. It was</p>	<p>39</p> <p>1 A I actually don't know. I just remember</p> <p>2 that was the only time I'd seen him. It may have</p> <p>3 been after that time, it may have been a little</p> <p>4 bit before that, I don't know, that was just my</p> <p>5 total at the building with him interaction.</p> <p>6 Q And is it fair to say that you were a</p> <p>7 little excited at the concept of seeing him?</p> <p>8 MS. VASQUEZ: Objection; assumes facts not</p> <p>9 in evidence. He didn't say that.</p> <p>10 Q Do you remember the question, Mr. Harrell?</p> <p>11 A Yeah. Was I excited? No. I – those</p> <p>12 types of things don't excite me.</p> <p>13 Q Okay. And what do you mean by those types</p> <p>14 of things?</p> <p>15 A Seeing people living their regular daily</p> <p>16 lives. I mean he wasn't in a movie that I'd seen</p> <p>17 because it was a passing – and even when all this</p> <p>18 came about it wasn't exciting, it was actually</p> <p>19 very inconvenient for me, but that's just being</p> <p>20 honest.</p> <p>21 Q Did you ever speak with Johnny Depp up</p> <p>22 through the time of July of 2016?</p>
<p>38</p> <p>1 so long ago, but I don't remember if it was</p> <p>2 Trinity or maybe Alex. But it was a time where we</p> <p>3 had double people at the desk, so it was either</p> <p>4 when I first got started in training or it was a</p> <p>5 passover of shifts.</p> <p>6 Q And so Johnny Depp actually came to the</p> <p>7 concierge desk and had an interaction with either</p> <p>8 Trinity or Alex while you were there, is that what</p> <p>9 you recall?</p> <p>10 A I remember it being an elevator</p> <p>11 interaction, so he was like out of the elevator</p> <p>12 and they were having a conversation. And I just</p> <p>13 kind of looked over and I didn't really think</p> <p>14 twice of it. And that's how I remember it being.</p> <p>15 So it wasn't him coming to the desk, it was more</p> <p>16 of him passing, stopped at the elevator, the doors</p> <p>17 were open, and interaction. There were other</p> <p>18 people in there – in the elevator as well,</p> <p>19 because it was kind of a lot of going on.</p> <p>20 Q All right. And your recollection is that</p> <p>21 was sometime shortly after you started in March of</p> <p>22 2016?</p>	<p>40</p> <p>1 A I did not.</p> <p>2 Q Have you ever spoken with Johnny Depp</p> <p>3 since July 2016?</p> <p>4 A No.</p> <p>5 Q Were you aware of what Johnny Depp's</p> <p>6 reputation was in the building as a resident?</p> <p>7 A I'm sorry, what was the last –</p> <p>8 MS. VASQUEZ: Objection.</p> <p>9 Q Were you aware of what Johnny Depp's</p> <p>10 reputation was within the building as a resident</p> <p>11 and owner?</p> <p>12 MS. VASQUEZ: Objection; vague and</p> <p>13 ambiguous as to reputation. Calls for</p> <p>14 speculation. Not really sure what that question</p> <p>15 is.</p> <p>16 Q Do you remember the question, Mr. Harrell?</p> <p>17 A Yeah. I don't understand the question.</p> <p>18 His reputation in the building?</p> <p>19 Q Did you ever speak with any of the other</p> <p>20 employees at the Eastern Columbia Building or</p> <p>21 other residents or owners about Johnny Depp?</p> <p>22 A I remember during that time I had just</p>

	41		43
	1 started, and I remember the -- my colleagues	1 associates to his lofts. Treat them like	
	2 mentioning he lived there. That was kind of the	2 residents. If you ever encounter them, show them	
	3 rest of the conversation. Reputation, I don't	3 utmost respect.	
R, H	4 know exactly what you mean by that.	4 Q So utmost respect to the associates that	
	5 Q Do you recall which of your colleagues	5 were associated with Johnny Depp?	
	6 mentioned that Johnny Depp lived at the Eastern	6 A And/or any other business in -- occupying	
	7 Columbia Building?	7 any of the lofts.	
	8 A Alex Romero as well as Trinity Esparza.	8 Q Okay. Do you have a recollection of who	
	9 Q Do you recall the context in which they	9 those people were that were identified as	
	10 mentioned that Johnny Depp lived at the Eastern	10 associated with Johnny Depp and those units?	
R	11 Columbia Building?	11 A Names or do you want, like, positions?	
	12 A They just said something along the lines	12 Q Either. If you could remember the names,	
	13 of a VIP resident at the top of the penthouse, you	13 that would be great. If you could remember the	
	14 may or may not see him. These are the units he	14 positions, that's good too.	
	15 owns. This is his team. I remember that being	15 A I remember Amber's sister. Amber's	
	16 introduced as well.	16 sister's husband, I remember. I think -- I	
	17 Q So there was a point that you were	17 believe I also remember Johnny Depp's bodyguard	
	18 introduced to Johnny Depp's team?	18 who worked there or his right-hand man or	
	19 A No. Through -- through names. So it was	19 something like that. Someone who was always with	
	20 -- as I first started there, they were able to	20 him. And those are kind of the ones that I	
	21 show me in the database, these are the units he	21 remember.	
	22 owns, these are the names of the people who are	22 Q So Amber's sister, Amber's sister's	
	42		44
	1 part his team, if you ever interact with these	1 husband, and Johnny Depp's bodyguard, that's what	
	2 people, just know that they work for and/or are a	2 you can recall --	
	3 part of those lofts.	3 A Those are the ones that kind of ring a	
	4 Q Did Trinity or Alex Romero or anyone else	4 bell.	
	5 at the Eastern Columbia Building point out any	5 Q Okay. I didn't finish the -- I -- so you	
	6 other owners and their particular units and the	6 can recall that identified as part of Johnny	R, H
	7 team besides Johnny Depp?	7 Depp's team included Amber's sister, Amber's	
	8 A Yes. If it was pertinent to -- to the	8 sister's husband, and Johnny Depp's bodyguard; is	
	9 job, yes. For example, we had a designer inside	9 that correct?	
	10 of the building and he lives there but he also	10 A Right.	
	11 does his business there. So I was introduced to	11 MS. VASQUEZ: Misstates the testimony as	
	12 all of the people in his cycle, and if they were	12 to Johnny Depp's team. I believe it was	
	13 to ever come, just kind of treat them like	13 associates or colleagues.	
	14 residents but they don't live there. And then	14 Q Were they also called team, part of his	
	15 there was a couple of other business offices that	15 team?	
	16 they did the same type of thing too.	16 A Yeah, that's how it was presented to me	
	17 Q Those were all business related though;	17 with my colleagues.	
	18 correct?	18 Q Okay. Was Amber -- was Amber Heard ever	
	19 A They call them colleagues, so colleagues	19 identified as part of that team?	R
	20 of the resident. So when they introduced me to --	20 A Yes.	
	21 not introduce me, when they showed me the platform	21 Q And in what context do you recall that?	
	22 of Johnny's lofts, they were like, these are all	22 A His wife.	

<p style="text-align: right;">45</p> <p>1 Q What, if anything, did Trinity or Alex or 2 anyone else at the Eastern Columbia Building say 3 about Amber Heard? 4 MS. VASQUEZ: Objection; vague as to time. 5 Q During the time frame of March 2016 6 through July 2016? 7 A What was the question? 8 Q What, if anything, did Trinity Esparza or 9 Alex Romero or any of the Eastern Columbia 10 Building employees say about Amber Heard during 11 the time period March 2016 to July 2016 -- through 12 July 2016? 13 A I think during that time something was 14 happening with, like, the law and -- I think 15 during passings it was said that they may be 16 moving, they may still be there but they may not 17 still be there. Nothing in depth, they just -- I 18 just remember Trinity saying something along the 19 lines of there's a court situation that's going to 20 be happening, just be on your Ps and Qs when it 21 comes to anything that people say. And if 22 anything [sic] says anything about Amber or</p>	<p style="text-align: right;">47</p> <p>1 I don't think they ever talked about it during 2 that time. 3 Q Is it safe to say you knew Johnny Depp, 4 not personally, but in terms of the roles he had 5 as an actor or whatever you read about him? 6 MS. VASQUEZ: Objection; vague and 7 ambiguous. 8 MS. BREDEHOFT: I'll rephrase it. 9 Q Have you ever seen any Johnny Depp movies? 10 A I have seen Johnny Depp movies. 11 Q How many? 12 A Maybe like two or three. 13 Q Do you remember which ones they were? 14 A Edward Scissorhands, Pirates of the 15 Caribbean, and -- yeah, those are the ones that 16 come to mind. 17 Q What did you think of Johnny Depp as an 18 actor? 19 MS. VASQUEZ: Objection; relevance. It's 20 also vague. 21 A I mean, I'm not an actor, I don't really 22 know if he was good. I think a lot of people</p>
<p style="text-align: right;">46</p> <p>1 Johnny, please don't share anything, just kind of 2 smooth it over. That was the only thing that I 3 remember kind of being brought up during that 4 time. 5 Q Do you recall approximately when that was 6 brought up to you? 7 A I don't. But it was brought up at various 8 times. I remember like almost every time that I 9 clocked in it was another thing about something 10 they had going on and to make sure that I don't 11 let people into the building that are not 12 authorized. I don't remember that being a 13 situation. I remember people asking questions, 14 and they were like don't -- don't answer any of 15 the questions. More residents were more 16 interested in the situation, they would ask us. 17 And I was told many times through Trinity and 18 Alex, please don't say anything. 19 Q Did they -- did Trinity or Alex or anyone 20 else with the Eastern Columbia Building tell you 21 what the specific law or the specific issues were? 22 A No. No one really talked about that. No.</p>	<p style="text-align: right;">48</p> <p>1 thought those movies were powering to their lives. 2 I didn't really think about it. 3 Q Did you like Johnny Depp as an actor? 4 MS. VASQUEZ: Objection; relevance. 5 Vague. 6 A I don't think -- I mean, I didn't really 7 think too much of it. Again, I didn't see a lot 8 of his body of work, I didn't follow him as an 9 actor. When they told me he lived at the 10 building, for example, it didn't really, like, 11 excite me at all. 12 Q Okay. Did you know -- did you ever hear 13 whether Johnny Depp had a temper or was known to 14 be violent? 15 MS. VASQUEZ: Objection; assumes facts not 16 in evidence; vague and ambiguous; and compound. 17 A I -- can you repeat the question? 18 Q Were you aware of whether Johnny Depp had 19 a temper or was known to be violent? 20 MS. VASQUEZ: Objection; compound; vague 21 and ambiguous; and assumes facts not in evidence. 22 A I -- I didn't know any of that. Again, I</p>

H	<p>49</p> <p>1 didn't really talk to him. There's a lot of</p> <p>2 things in the media and things people would say.</p> <p>3 I didn't really read into that or even create an</p> <p>4 opinion about that. Because I knew I was going to</p> <p>5 have to be witnesses to situations, and it wasn't</p> <p>6 really something I followed or am aware of.</p> <p>7 Q You said you knew you were going to have</p> <p>8 to be a witness. What do you mean by that?</p> <p>9 A As this started to -- during that time</p> <p>10 period, like, towards when everything I guess went</p> <p>11 down, they told me I may have to go to court and</p> <p>12 be a witness because I had interaction with Amber</p> <p>13 and they had it on camera, and I was kind of</p> <p>14 stunned and I was shocked. And so I figured it</p> <p>15 would probably be best if I didn't try to research</p> <p>16 things I didn't know and/or create an opinion</p> <p>17 based upon things that I read versus just the</p> <p>18 interactions I had with those parties or the lack</p> <p>19 of interactions I've had.</p> <p>20 Q Who told you you may have to go to court?</p> <p>21 A I believe Trinity was the first person</p> <p>22 that told me, and then Alex kind of like -- that I</p>	<p>51</p> <p>1 she was like, I believe you're on camera talking</p> <p>2 to her, you may be subpoenaed in order to help out</p> <p>3 the case or, like, be brought into the case or</p> <p>4 something along that nature.</p> <p>5 Q And what did Trinity say that you saw in</p> <p>6 being on camera with Amber that would have lead to</p> <p>7 you being a witness?</p> <p>8 MS. VASQUEZ: Objection; hearsay.</p> <p>9 A I think it was along the time line, it was</p> <p>10 something to do with the time line. It was so</p> <p>11 long ago, but I remember it being a situation</p> <p>12 where something was said -- something Amber had</p> <p>13 said, and I had seen her the next day or before</p> <p>14 the day or after the day or very close in a time</p> <p>15 frame, and she says you may have to be a witness;</p> <p>16 do you remember situations? And that's kind of</p> <p>17 the conversation. It wasn't very long. It was</p> <p>18 very quick and a long time ago.</p> <p>19 Q What situation did Trinity ask you if you</p> <p>20 recalled?</p> <p>21 A She asked me if I remember interacting</p> <p>22 with her. Did I -- did I have -- she first asked</p>	<p>R, H, F/A, SP, Lack of Pers. Know., Improper Opinion</p>
	<p>50</p> <p>1 may have -- I may be a witness as well. And then</p> <p>2 throughout the months, I remember Brandon telling</p> <p>3 me that they were going -- Brandon Patterson, the</p> <p>4 general manager, telling me that they will</p> <p>5 subpoena me in order to be a witness in court of</p> <p>6 the situation.</p> <p>7 Q What did Trinity, Alex, and Brandon tell</p> <p>8 you that you had knowledge of that would lead to</p> <p>9 you being a witness?</p> <p>10 MS. VASQUEZ: Objection; compound.</p> <p>11 MS. BREDEHOFT: Well, I can take -- I'll</p> <p>12 take them separate.</p> <p>13 Q What did Trinity say that you had</p> <p>14 knowledge of that would lead to you being a</p> <p>15 witness?</p> <p>16 A That there was allegations towards Johnny</p> <p>17 from Amber.</p> <p>18 Q What else?</p> <p>19 A That's all I kind of remember.</p> <p>20 Q Well, why -- why did Trinity think you had</p> <p>21 any knowledge related to --</p> <p>22 A Because they saw me on camera with her and</p>	<p>52</p> <p>1 me, I remember, have you ever interacted with her</p> <p>2 and do you remember?</p> <p>3 Q Do you remember what?</p> <p>4 A Do you remember, like, any of the</p> <p>5 interactions or, like, do you remember, like, what</p> <p>6 happened? And it wasn't anything odd, so I do</p> <p>7 remember it. It was something with dry cleaning</p> <p>8 and picking up packages, it wasn't any -- like,</p> <p>9 that was the only interactions I had with her.</p> <p>10 And then they were saying, yeah, that we could</p> <p>11 pull the footage and they may need that because it</p> <p>12 was around that time where something was being</p> <p>13 said.</p> <p>14 Q Was this Trinity who was saying, we can</p> <p>15 pull the footage?</p> <p>16 A These are various conversations that I put</p> <p>17 together. I remember she asked me in one occasion</p> <p>18 did I ever have interaction with her? And I said</p> <p>19 yeah. And she's like, do you remember what</p> <p>20 happened? And I said yeah, it was something as</p> <p>21 simple as getting a package and I walked over.</p> <p>22 And she was like oh, okay. And then I remember</p>	

R, F/A,
SP, H,
Lack of
Pers. Know., Impropr. Opin.

<p>53</p> <p>1 Brandon saying that they did see me on footage 2 days after something had happened and it was a 3 different – completely different scenario and it 4 was just all bits and pieces that I'm putting 5 together to share my remembrances of what had 6 happened.</p> <p>7 Q So what did Trinity say that you saw that 8 might be able to help?</p> <p>9 A I believe – 10 MS. VASQUEZ: Objection; calls for 11 hearsay. Go ahead.</p> <p>12 A I believe it was something along the lines 13 of I interacted her – with Amber when something 14 had been alleged to happen. And there like – I 15 think she said there were maybe like photos 16 lingering around and you had talked to her 17 slightly after those photos went out or something 18 like that?</p> <p>19 Q What did Trinity say about your 20 interaction that would be relevant or helpful?</p> <p>21 MS. VASQUEZ: Objection; calls for 22 hearsay; it's vague and ambiguous; assumes facts</p>	<p>55</p> <p>1 Q And what do you mean by what is said or Vague, Imp. 2 not done? Opinion, R, 3 A I believe there was some allegations, and SP, F/A, H 4 maybe my testimony or the occurrence of me having Lack of 5 a conversation with the person around the same Pers. Know. 6 time period would be able to either further the 7 allegations or prove the allegations to not be 8 correct is what I think she said.</p> <p>9 Q What allegation would you be able to Lack of Pers. 10 either further or prove not correct according to Know., Imp. 11 Trinity? Opinion, SP, 12 A I believe it was like physical abuse. H, F/A</p> <p>13 Q And what did Trinity say that you would 14 see that would be relevant to whether there was 15 physical abuse or not?</p> <p>16 MS. VASQUEZ: Objection calls for 17 speculation; assumes facts not in evidence; calls 18 for hearsay; it's vague and ambiguous.</p> <p>19 A When -- I'm so sorry, when these 20 objections happen, do I have to answer?</p> <p>21 Q Yes. 22 MS. VASQUEZ: Yes.</p>
<p>54</p> <p>1 not in evidence; and misstates testimony. 2 A I'm sorry, what was the question? 3 MS. BREDEHOFT: Can you read it back, 4 Paul. Thank you. 5 (Requested portion read back.) 6 MS. VASQUEZ: Same objections.</p> <p>7 A I don't really understand the question. 8 Q Trinity was telling you that you were on 9 camera, that you had an interaction with Amber, 10 and that you may be able to -- and I'm using your 11 word -- help, and that you may be a witness. What 12 did she tell you about your interactions with 13 Amber would be helpful or may cause you to be a 14 witness?</p> <p>15 MS. VASQUEZ: Objection; misstates the 16 testimony; assumes facts not in evidence; calls 17 for hearsay.</p> <p>18 A I – I don't necessarily recall exactly 19 what she said, but I remember her kind of telling 20 me that I may be asked questions that can help 21 further – further investigation towards what was 22 said or what was not done.</p>	<p>56</p> <p>1 A Oh. 2 MS. VASQUEZ: I'm just preserving the 3 record, Mr. Harrell, I apologize.</p> <p>4 A Okay. I'm sorry what was the question? 5 Read it back. 6 MS. BREDEHOFT: Paul, can you read it 7 back. Thank you. 8 (Requested portion read back.) 9 MS. VASQUEZ: Same objection.</p> <p>10 A I don't necessarily remember Trinity 11 having a conversation with me that will lead to my 12 testimony being helpful to the case. What I do 13 remember is her saying something along the lines 14 of perhaps your – your testimony can help if – Lack of 15 prove allegations or prove them correct or false. Pers 16 It wasn't a long conversation, again. It was Know 17 something very quickly said. It wasn't biased. Imp. 18 It was just be honest if you're subpoenaed and Opinion 19 that's that.</p> <p>20 Q Did Trinity tell you who would be 21 subpoenaing you? 22 A She did not.</p>

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<p>57</p> <p>1 Q Now, when you said earlier that we have</p> <p>2 pulled the footage, was that Trinity who said she</p> <p>3 had pulled the footage?</p> <p>4 MS. VASQUEZ: Objection; vague and</p> <p>5 ambiguous. I'm unclear what you're asking him.</p> <p>6 A I believe it was Brandon who said that,</p> <p>7 who was the general manager. He was the one who</p> <p>8 kind of has -- had pulled all the footage. And</p> <p>9 that's kind of when I had to remember the</p> <p>10 interactions.</p> <p>11 Q What did Brandon tell you about why he was</p> <p>12 pulling footage and what footage he was pulling?</p> <p>13 MS. VASQUEZ: Objection; compound; and</p> <p>14 requests hearsay.</p> <p>15 A I don't remember Brandon having a long</p> <p>16 conversation with it. I just remember him saying</p> <p>17 that he was going to be subpoenaed as well and had</p> <p>18 to get together footage. And I remember telling</p> <p>19 Trinity before that I had an interaction with her</p> <p>20 and I remember him just kind of quickly saying he</p> <p>21 got subpoenaed, he will be pulling those -- that</p> <p>22 camera footage of the interaction that I had with</p>	<p>59</p> <p>1 A Not necessarily. I -- I -- that was the</p> <p>2 time I guess I played it back. But I -- I'm sure</p> <p>3 I probably rewind a couple of times before,</p> <p>4 perhaps to check out the packages and see what I</p> <p>5 was able to check out. What that looks like is</p> <p>6 sometimes we'll go to the package room and we'll</p> <p>7 just kind of grab things, make it a smooth</p> <p>8 interaction and then we check it out on the back</p> <p>9 half and I would review the footage to make sure I</p> <p>10 got the right packages from the shelf and</p> <p>11 everything was aligned that way. So I'm pretty</p> <p>12 sure I've reviewed the footage of her and I by</p> <p>13 myself to make sure I checked out the process</p> <p>14 correctly.</p> <p>15 Q Okay. Let me just take those one step at</p> <p>16 a time. So do you recall when you were first</p> <p>17 subpoenaed to give a deposition?</p> <p>18 A I don't remember that.</p> <p>19 Q Was that the first -- was the deposition</p> <p>20 where you were subpoenaed, is that the first time</p> <p>21 you can recall someone playing footage of your</p> <p>22 interactions with Amber Heard?</p>
<p>58</p> <p>1 all the people that I mentioned.</p> <p>2 Q Did you have an understanding that Brandon</p> <p>3 was reviewing the footage and pulling footage?</p> <p>4 MS. VASQUEZ: Objection; assumes facts not</p> <p>5 in evidence; calls for speculation.</p> <p>6 A I'm sure if he had to pull footage he was</p> <p>7 able to. I wasn't sure how that was going to</p> <p>8 work. In fact, I didn't really know that the</p> <p>9 footage was pulled until I got subpoenaed and I</p> <p>10 had to do this before and they played clips of me.</p> <p>11 Q I want to just understand what your answer</p> <p>12 just meant there. When did you first see any of</p> <p>13 the footage relating to any interaction you had</p> <p>14 with Amber Heard?</p> <p>15 MS. VASQUEZ: Objection; vague as to "the</p> <p>16 footage."</p> <p>17 A I saw footage when I got subpoenaed before</p> <p>18 and -- and I had to be a witness and they pulled</p> <p>19 footage of me interacting with her.</p> <p>20 Q Is that the first time you ever reviewed</p> <p>21 any of the video that involved your interactions</p> <p>22 with Amber Heard?</p>	<p>60</p> <p>1 A I believe it was the second time. So the</p> <p>2 first time I don't think there was any footage</p> <p>3 played. I think it was the second time where they</p> <p>4 actually asked me if I recognized people on the</p> <p>5 footage, and it was me and other people that I</p> <p>6 don't remember the names of.</p> <p>7 Q All right. Let's go with the first time.</p> <p>8 When is the first time that you recall being shown</p> <p>9 any footage of you interacting with Amber Heard?</p> <p>10 A The first time that I actually was showed</p> <p>11 footage of me interacting was the second time that</p> <p>12 I got subpoenaed, which was I think the following</p> <p>13 year. I don't remember the month.</p> <p>14 Q So 2017?</p> <p>15 A Possibly.</p> <p>16 Q What was the nature of the lawsuit in</p> <p>17 which you were subpoenaed and shown footage in the</p> <p>18 following year?</p> <p>19 A I don't understand the question.</p> <p>20 Q I'm going to go back and I'm going to see</p> <p>21 if I can try to understand this. So the first</p> <p>22 time that -- and please correct me if I'm getting</p>

Transcript of Cornelius Harrell
Conducted on January 13, 2021

16 (61 to 64)

<p style="text-align: right;">61</p> <p>1 this wrong -- the very first time that you were 2 shown footage of your interaction with Amber 3 Heard, you believe was the second time you were 4 subpoenaed; is that correct? 5 A Yes. 6 Q And that was roughly a year later, 7 sometime in 2017? 8 A Possibly, yes. 9 Q Okay. So do you -- did you give a 10 deposition? 11 A I believe so, yes. 12 Q Do you recall who the lawyers were? 13 A I don't. 14 Q Do you recall what the lawsuit was about? 15 A Honestly, I don't. I feel like this is 16 all the same. I couldn't tell you today what the 17 lawsuit is about, I just know that I have to be 18 here and it's inconvenient for me. And I know 19 that every time that this had happened I feel like 20 it's every single year, and it may not be that way 21 but it feels like that and I feel like it's the 22 same exact thing, same exact answers, same exact</p>	<p style="text-align: right;">63</p> <p>1 A -- that I had to talk about this. 2 Q Do you remember a Bloom Hergott? 3 A That's a very familiar name with some of 4 these documents as well. 5 Q All right. Do you recall whether you had 6 to give a deposition in that case? 7 A I believe I did. One of them was a 8 written one and I just -- instead of being 9 face-to-face, I wrote it out. I'm not sure if it 10 was that one or -- again, it's happened so many 11 times I kind of just slam them together. One was 12 in writing, one was in person, another one got 13 rescheduled a lot of times and I ended up 14 forfeiting it, and this is I guess the fourth one. 15 Q Okay. And you remember the name Mandel as 16 one of the suits, that it was involved in one of 17 the suits? 18 A That sounds like a very familiar name. I 19 think so. 20 Q And do you recall Bloom Hergott, another 21 one -- being another one? 22 A I do remember that one.</p>
<p style="text-align: right;">62</p> <p>1 scenarios. It just gets harder and harder to 2 recall as time progresses, and I live a completely 3 different life. 4 Q So this 2017 time that you were shown the 5 footage for the first time of your interactions 6 with Amber, do you have a recollection of their 7 being a court reporter there and lawyers asking 8 you questions? 9 A Every time that I was -- yes, I do 10 remember lawyers asking me questions and playing 11 footage and being in a -- in a building. 12 Q Do you know whether the lawsuit involved 13 Johnny Depp's former manager, Mandel, does that 14 ring a bell? 15 A Mandel, is that -- is that a last name or 16 a first name? 17 Q Last -- 18 A I remember that on one of the papers. I 19 remember that on one of the papers, but I'm not 20 exactly sure if that's the first time, the second 21 time -- 22 Q Okay.</p>	<p style="text-align: right;">64</p> <p>1 Q You do remember that one? 2 A Yes. 3 Q Okay. And you think that you testified in 4 one of those cases and provided written testimony 5 in the other; is that correct? 6 A I believe so, yes. 7 Q And it related to your interactions with 8 Amber Heard; is that correct? 9 A Yes. 10 Q Did it relate to anything else? 11 A Interactions with other people surrounding 12 her in one of them, yes. Some of the footage they 13 showed me they asked me, I remember someone asking 14 me if I can identify someone who was in an 15 elevator visiting her, and they had an interaction 16 in the elevator and they asked me if I ran into 17 that resident or if I'd ever seen -- not resident, 18 if I ran into that guest or if I can identify the 19 guest. 20 Q Were you able to? 21 A No. 22 Q Okay.</p>

<p>65</p> <p>1 A But they told me who it was and I felt 2 kind of silly. But again, that just shows I'm not 3 really familiar with this whole entertainment 4 industry. 5 Q Okay. Let me -- let me back up. Now, 6 you've said that you were pretty sure that at some 7 point shortly after the interaction with Amber 8 Heard that you double-checked the footage for the 9 package room to make sure you gave her the right 10 package; is that correct? 11 MS. VASQUEZ: Objection -- 12 A Yeah. 13 MS. VASQUEZ: -- objection misstates the 14 testimony. Assumes facts not in evidence. 15 Q I'm sorry, did I misstates that, 16 Mr. Harrell? I thought you said yes? 17 A Yes, I may have done that. Often when we 18 release packages it's a smooth interaction, you 19 don't stop at the computer. Sometimes you do stop 20 at the computer, but I remember with that specific 21 resident it doesn't -- it probably wasn't a 22 situation where I stopped and I, like, did it</p>	<p>67</p> <p>1 time. 2 Q Okay. Have you looked at it on your own 3 or with anybody else -- 4 A No. 5 Q -- and I'm talking about the footage of 6 your interaction with Amber? 7 A No. 8 Q Okay. So from the date you had the 9 interaction with Amber Heard in May of 2016 10 through sometime the next year, you never watched 11 that video of your interaction with Amber; is that 12 correct? 13 A No. 14 Q I asked that badly. I said is that 15 correct and you said no, so am I wrong or is that 16 accurate? 17 A I have not watched the video of Amber and 18 I interacting. 19 Q Thank you. Now, when is the first time 20 that anyone asked you about your interaction with 21 Amber Heard on that occasion in May 2016 as 22 reflected on the video footage?</p>
<p>66</p> <p>1 right away, I was able to talk to her and then I 2 gave her a package, and I had to review the 3 footage in order to check off the right package. 4 Q Okay. So you may have, but do you have a 5 specific recall as you sit here today that you 6 actually double-checked the package room to see 7 that you gave Amber Heard the correct package on 8 that occasion? 9 A No. 10 Q So I'm going to try to do the best I can 11 with getting your recollection of the times you 12 have seen the footage, okay? So if I'm 13 understanding your testimony, and I want you to 14 correct me if I misunderstand, the first time you 15 were shown the footage of your interaction with 16 Amber Heard was roughly a year after the actual 17 interaction; is that correct? 18 A Yes. 19 Q Okay. And when was the second time you 20 were shown the footage of your interaction with 21 Amber Heard? 22 A I don't think I've been shown it a second</p>	<p>68</p> <p>1 MS. VASQUEZ: Objection. Asked and 2 answered. 3 Q Do you understand my question? 4 A I don't remember your question. 5 Q When is the first time you can recall that 6 anyone asked you your recollection of your 7 interaction with Amber Heard on that May 2016 date 8 that was captured on the video? 9 A The first time I was asked about the video 10 was the first time I got subpoenaed, and that was 11 later on in that year or the next year. 12 Q And between the time of your having the 13 interaction with Amber Heard -- and I think it was 14 May 22, 2016 -- and the time you were first 15 subpoenaed, did anyone ask you what your 16 recollection was of your interaction with Amber 17 Heard? 18 A No one asked me specifically what the 19 recollections were. I remember Trinity mentioning 20 -- she didn't ask me like -- if I remember it, I 21 remember her talking about the situation that they 22 -- you know, that I did have with her that I told</p>

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<p>69</p> <p>1 her that I did have interaction with her, but she 2 didn't ask me what it was. She never even asked 3 me further details. The only time that I've 4 actually had to discuss it was with lawyers being 5 on camera.</p> <p>6 Q Okay. And the first time that you ever 7 discussed what you actually saw and what your 8 interactions were with Amber Heard is in a 9 deposition being asked by lawyers after you were 10 first subpoenaed; is that accurate?</p> <p>11 MS. VASQUEZ: Asked and answered.</p> <p>12 A Yes.</p> <p>13 Q Okay. And after -- have you ever talked 14 to any lawyer or representative of Mr. Depp about 15 what you observed during your interaction with 16 Amber Heard other than what has been recorded in a 17 deposition or written interrogatory -- written 18 deposition or written interrogatories?</p> <p>19 A I have not.</p> <p>20 MS. BREDEHOFT: I'm going to ask you, 21 Alex, if you can bring up what is Harrell 2.</p> <p>22 Q And, Mr. Harrell, just to explain this to</p>	<p>71</p> <p>1 MS. BREDEHOFT: I see a few of us.</p> <p>2 PLANET DEPOS TECHNICIAN: Okay. If you 3 bring your -- if you bring your mouse over those 4 videos --</p> <p>5 MS. BREDEHOFT: My mouse is locked out. I 6 think it's, Alex, because you've got control.</p> <p>7 PLANET DEPOS TECHNICIAN: Okay. I'll back 8 out of this. The way to do it, if you have 9 Mr. Harrell's video right now, you should have in 10 the upper right-hand corner of his video there 11 should be a little button with three dots. If you 12 click that you'll get a drop down menu, and 13 there's the option to pin his video. Are you 14 seeing that?</p> <p>15 MS. BREDEHOFT: For some reason my mouse 16 is not -- it's like it's locked out. Is it 17 possible -- is it possible that I'm still locked 18 out, Alex?</p> <p>19 PLANET DEPOS TECHNICIAN: Do you have 20 another monitor up? Another -- like an 21 alternative screen?</p> <p>22 MS. BREDEHOFT: I do, but it's the same</p>
<p>70</p> <p>1 you, we have premarked exhibits that we may use 2 during this deposition, and we have a technician, 3 Alex, who is going to then pull those and bring it 4 up so that you can see it and we can all see it at 5 the same time. Okay?</p> <p>6 And I'm not sure how to do this gallery, 7 Alex, but I don't have the witness on my screen, 8 Mr. Harrell. I have some other people, but I'd 9 like to have the witness on my screen. How do I 10 do that? Do I take control from you and change my 11 gallery?</p> <p>12 PLANET DEPOS TECHNICIAN: This is Alex, 13 the tech speaking, the option is to pin. You 14 should have a -- if you bring your mouse cursor 15 over the videos, there should be a little arrow 16 button at the bottom which can bring you to 17 Mr. Harrell's video.</p> <p>18 MS. BREDEHOFT: Do I have -- do I have 19 control to do that? Do you need to give me 20 control to do that?</p> <p>21 PLANET DEPOS TECHNICIAN: Do you see the 22 videos of the participants?</p>	<p>72</p> <p>1 mouse. Sorry, I'm not trying to make this 2 difficult, but I would like to at least have the 3 witness.</p> <p>4 PLANET DEPOS TECHNICIAN: Yeah, that's 5 very reasonable, of course. I don't have an 6 immediate explanation for why your mouse is gone, 7 unfortunately. Is it something that you can 8 unplug and replug?</p> <p>9 MS. BREDEHOFT: Let me see if I can turn 10 it off and turn it back on. Hold on. Okay. What 11 do I do for pinning? I'm working.</p> <p>12 PLANET DEPOS TECHNICIAN: Wonderful. If 13 you bring your cursor over Mr. Harrell's video.</p> <p>14 MS. BREDEHOFT: Got it.</p> <p>15 PLANET DEPOS TECHNICIAN: Got it?</p> <p>16 MS. BREDEHOFT: Yep, we're good.</p> <p>17 PLANET DEPOS TECHNICIAN: Wonderful. All 18 right.</p> <p>19 MS. BREDEHOFT: I want to be able to look 20 at him and him look at me. Okay. Great. Now go 21 ahead and bring up that exhibit.</p> <p>22 PLANET DEPOS TECHNICIAN: Certainly.</p>

<p>73</p> <p>1 Q So, Mr. Harrell, I'm going to ask you to 2 take a look at what I just labeled Harrell 3 Deposition Exhibit 2. And this is a subpoena. 4 And if I can take control, Alex, and scroll down. 5 Okay. There we go. Not able to scroll down. Let 6 me do this. There we go, I'll do it that way. 7 Okay. 8 Do you recognize this subpoena? It says 9 Cornelius Harrell, and it says July 19, 2016, for 10 your personal appearance. Do you see that? 11 A Yes. 12 Q Okay. Does that help refresh your 13 recollection of when you received the subpoena, 14 the first subpoena? 15 A When you says recollection, do you mean 16 the time period? 17 Q Yes. 18 A Not necessarily. It does say the dates 19 there, but I remember being served and the dates 20 changing varies times and/or it being kind of 21 farther out. I remember getting a subpoena – 22 like served, and then the date being so far out</p>	<p>75</p> <p>1 when I did get back there I got -- they were like, 2 we need to get you these documents, so I went back 3 there to pick up these documents and work a shift 4 on a Sunday. 5 Q Do you remember how much time you took 6 off? 7 A Every year that job at I take probably 8 four or five months off. Clearly it wasn't that 9 many months off in this being that it was May and 10 this is July, but probably a couple of weeks, 11 maybe three, four weeks. 12 Q All right. So would you say sometime mid 13 to late June is when you first picked up a 14 subpoena? 15 A Possibly, but I do remember one coming on 16 my birthday, so this could totally be the one that 17 came to my house on my birthday because my 18 birthday is June 25th, and someone served me on my 19 birthday at my house. This could be very well 20 that. 21 Q Okay. So your -- is it fair to say your 22 best recollection is the first time you were</p>
<p>74</p> <p>1 for one of them. So that could be very well this 2 time or like way before, if that makes sense. 3 Q Do you remember how much time elapsed 4 between when you had the interaction with Amber 5 Heard on May 21 -- 22, 2016, and when you first 6 were subpoenaed? 7 A It says July 28th, 2016. And if you say 8 it happened, then it happened pretty quickly, but 9 I don't remember. I do remember papers being left 10 at the front desk because they didn't know where I 11 lived, and again, I only worked there Sundays, so 12 it could've been sitting there for a while with my 13 name on it and then I pick it up. 14 Q So when do you recall first picking up a 15 subpoena? 16 A The first time, it was the next time that 17 I started to work there because when all of this 18 happened, I kind of didn't want to work there 19 anymore because I felt like I didn't want to be 20 involved in things like that, it just wasn't 21 appropriate for me, so I do remember taking some 22 time off, like a lot of time off, and I remember</p>	<p>76</p> <p>1 subpoenaed to provide testimony relating to your 2 interaction with Amber Heard on May 22nd was on 3 your birthday, June 25, 2016? 4 MS. VASQUEZ: Objection -- 5 A Yeah, that could be -- 6 MS. VASQUEZ: -- objection; assumes facts 7 not in evidence. 8 Q Go ahead. 9 A That could be the case. 10 Q Is that your best recollection, though, 11 I'm just trying to get your best? 12 A I think so. It's been so many years and I 13 feel like every year, again, the first time I'm 14 not exactly sure -- because now that I think about 15 it, I had to show up to two different places, 16 there were two different ones, and then I had to 17 write one in, so there's been -- this is the 18 fourth one, now that I'm thinking about it. So 19 I'm not exactly sure if this was the fourth time 20 -- the first, second, or third time, but I do 21 remember one coming to my house and I do one 22 coming to my job, and I remember writing one in.</p>

L, F/A,
R, SP,
Lack of Pers.
Know., Imp.
Opinion

<p style="text-align: right;">77</p> <p>1 And I remember picking one up from the desk. It's 2 been a lot of times, but I can't give you a clear 3 answer because I don't remember. 4 Q Okay. So do you have a recollection of 5 being -- this is the action that's actually -- 6 this is the action that's -- hold on, let me jump 7 this to the top. I'm not doing a great job with 8 this one for some reason. This is actually the 9 Amber Laura Heard versus John Christopher Depp II, 10 do you see that there? 11 A Yes. 12 Q Okay. And it's ordering you to appear on 13 the deposition of July 28, 2016, do you see that? 14 A Yes. 15 Q Okay. And this -- the date on this is 16 July 19, and there's a service, proof of service 17 that says it was served on you on July 20. And if 18 I'm understanding you, you recall actually being 19 served once before that, is that correct? 20 A No, I think it was after that one. So 21 that's July 20th, all this happened in May. This 22 -- does it say where they dropped it off, where</p>	<p style="text-align: right;">79</p> <p>1 A Yes. 2 Q And I'm trying to ascertain when the first 3 time you were subpoenaed is. Now, in looking at 4 this document, which says that you were served on 5 the 20th of July of 2016, do you believe this is 6 the first time that you were subpoenaed to discuss 7 your interaction with Amber Heard on 8 May 22nd, 2016? 9 MS. VASQUEZ: Objection; assumes facts not 10 in evidence; misstates the record. 11 A That is the first time that I remember 12 subpoenaed -- being subpoenaed in order to talk 13 about the conversation that I had with Amber. I 14 don't think that is the time where they had me 15 review the footage. And they had footage that I 16 came to, but that one is the one at Century City, 17 and I remember that one. And that one was just 18 vocal, it was all me sitting there talking and 19 recollecting specific situations. 20 Q Okay. 21 A I don't think any video footage I remember 22 -- I don't remember any video footage being there</p>
<p style="text-align: right;">78</p> <p>1 they served me at in this one? 2 Q The address that they have for you is -- 3 let me see if I can do the actual highlighting. 4 It shows you right here. 5 A So that was the one left at the front 6 desk, because that's the front desk address. 7 Q Okay. So based on reviewing this, is your 8 best recollection the first time that you were 9 subpoenaed was July 20th, 2016, to -- and just so 10 we're clear, first subpoenaed to discuss your 11 interaction with Ms. Heard on May 22, 2016? 12 MS. VASQUEZ: Objection; assumes facts not 13 in evidence. 14 A You said it was -- I totally -- 15 Q Let me take you through it. I'm not 16 trying to confuse you, believe me. So I'd like to 17 take -- let me walk you through so we can both be 18 on the same page. I believe that you indicated 19 that the very first time that you reviewed the 20 videotape of your interaction with Amber Heard on 21 May 22, 2016, was after you were subpoenaed; is 22 that correct?</p>	<p style="text-align: right;">80</p> <p>1 that I had to review. I think it was somewhere 2 downtown that I did that. 3 Q All right. And was that later than 4 July 28, 2016; that you had a deposition where 5 they reviewed the footage? 6 A Yes. 7 Q Okay. So when you received this subpoena 8 that's Harrell Deposition Exhibit 2, did you 9 review the video footage of your interaction with 10 Amber Heard on May 22, 2016? 11 A I didn't. 12 Q So between May 22, 2016, and 13 July 28, 2016, do you recall ever reviewing the 14 video footage of your interaction between you and 15 Amber Heard on May 22, 2016? 16 A Personally, I never reviewed the footage 17 if it wasn't for the purpose of just verifying a 18 package. So when I got subpoenaed I did not 19 review the footage to be prepared for the 20 conversation. 21 Q Okay. So when you provided your 22 deposition on July 28, 2016, you had not reviewed</p>

<p>81</p> <p>1 the video footage of your interaction with Amber 2 Heard on May 22nd, 2016; is that correct?</p> <p>3 A In preparation for the deposition, I did 4 not review the footage. I could've reviewed the 5 footage when verifying the package, but it had 6 nothing to do with this. But when I was served 7 with this, I had no time to review the footage --</p> <p>8 Q Prior to --</p> <p>9 A I didn't work there.</p> <p>10 Q I'm sorry. Okay. I'm sorry, what did you 11 say at the end there? I missed that.</p> <p>12 A I don't work there. I don't work at the 13 Eastern Columbia desk frequently enough to go and 14 look at footage after. And, in fact, I remember 15 taking time off and I remember being served and it 16 was just a lot for me. And I -- when Trinity -- I 17 remember Trinity telling me there was a very 18 important package, I picked up the package, it was 19 this, but I didn't have time to review it because 20 I didn't work there.</p> <p>21 Q Okay. And between the time of your 22 interaction with Amber Heard on May 22nd, 2016,</p>	<p>83</p> <p>1 A Correct.</p> <p>2 Q Okay. And again, just so we're clear, I'm 3 talking about your interaction with Amber Heard on 4 May 22, 2016. Did you understand that to be my 5 question?</p> <p>6 A Yes.</p> <p>7 Q Okay. Thank you. Okay. So --</p> <p>8 THE VIDEOGRAPHER: Is it a good time to 9 change the tape?</p> <p>10 MS. BREDEHOFT: Absolutely. If you want 11 to take a break, we absolutely can.</p> <p>12 THE VIDEOGRAPHER: Okay.</p> <p>13 MS. BREDEHOFT: You want to -- it's 6:05 14 -- well, 3:05 your time. Do you want -- would a 15 ten-minute break work for everyone or would you 16 like more?</p> <p>17 MS. VASQUEZ: I'm fine with ten minutes, 18 but I defer to the witness.</p> <p>19 MS. BREDEHOFT: And the court reporter, of 20 course.</p> <p>21 THE VIDEOGRAPHER: All right. So it is 22 6:05 p.m. We go off the record.</p>
<p>82</p> <p>1 and this deposition being held on July 28, 2016, 2 did anyone ask you any questions about your 3 interaction with Amber Heard that was recorded on 4 video footage on May 22nd, 2016?</p> <p>5 MS. VASQUEZ: Objection; asked and 6 answered several times.</p> <p>7 A I lost the question. What was it?</p> <p>8 Q Between May 22, 2016, when you had the 9 interaction with Amber Heard that was recorded on 10 the video footage, and July 28, 2016, the date of 11 the deposition in this case, that's reflected on 12 Deposition Exhibit 2, did anyone ask you any 13 questions about your interaction with Amber Heard 14 on May 22nd, 2016, that was recorded on video 15 footage?</p> <p>16 A No.</p> <p>17 MS. VASQUEZ: Objection; asked and 18 answered.</p> <p>19 Q Okay. So the very first time anyone asked 20 you, no matter who, Trinity, Brandon, Alex, 21 lawyers, anyone, was on July 28, 2016; is that 22 correct?</p>	<p>84</p> <p>1 (Off the record from 6:05 p.m. to 6:16 2 p.m.)</p> <p>3 THE VIDEOGRAPHER: It is the beginning of 4 media number two of the testimony of Cornelius 5 Harrell. It is 6:16 p.m. We are back on the 6 record.</p> <p>7 BY MS. BREDEHOFT:</p> <p>8 Q Mr. Harrell, do you know whether Mr. Depp 9 has ever been physically violent with Amber Heard?</p> <p>10 MS. VASQUEZ: Objection; assumes facts not 11 in evidence.</p> <p>12 A I don't personally know of him having 13 violence towards Amber. I've never seen them 14 together.</p> <p>15 Q Okay. So you don't know whether he has or 16 has not been physically violent to Amber Heard; is 17 that correct?</p> <p>18 A Correct.</p> <p>19 MS. VASQUEZ: Objection; asked and 20 answered.</p> <p>21 Q Thank you. We've been talking quite a bit 22 about this interaction. This May 22, 2016,</p>

<p>85</p> <p>1 interaction with Amber Heard that was captured on 2 the video, was that the first time you ever met 3 Amber Heard? 4 A I don't think so. 5 Q When is the first time you can recall 6 meeting Amber Heard? 7 A I'm not exactly sure. I can't recall, but 8 I don't remember that being the first time I've 9 ever seen her, because it's a residential building 10 and I'm not exactly sure if that was the first 11 time I've seen her. 12 Q So how would you describe your 13 interactions with Amber Heard -- well, let me ask 14 you this, how many times do you believe you had 15 interactions with Amber Heard? 16 A Less than five times, maybe -- 17 Q And how would you describe -- I'm sorry. 18 A Maybe more. I mean, all of them have been 19 very pleasant. She's very nice, very kind. 20 Q Thank you. That's what I was going to 21 ask. Now, would you typically see Amber Heard 22 when she was leaving the building to go some place</p>	<p>87</p> <p>1 that you had interaction with Amber Heard where 2 she was picking up dry cleaning or a package? 3 A Like three times. 4 Q Okay. And you think there was at least 5 one time before the May 22, 2016, interaction that 6 was captured on video? 7 A Possibly. 8 Q When is the first time that you became 9 aware that Amber Heard was alleging that Johnny 10 Depp engaged in domestic violence against her? 11 A After the May 22nd, after the time I 12 interacted with her. I had no idea. I would say 13 probably early June. 14 Q Just so we're clear, so when you saw Amber 15 Heard on May 22, 2016, you had no idea at that 16 point that Amber Heard was alleging that Johnny 17 Depp had engaged in acts of domestic violence 18 against him; is that correct? 19 A Correct. 20 Q Have you ever been shown any video clips 21 or pictures from May 21st, 2016? 22 A Pictures?</p> <p>L, R</p>
<p>86</p> <p>1 or returning from being some place? 2 A I don't understand the question. 3 Q Well, we talked earlier about if people 4 are parked in the garage and they use their fobs, 5 they go up and down and you can see them on the 6 elevator, you know, on the cameras, but you don't 7 see them, you don't have an interaction with them. 8 When you had interaction with Amber Heard, were 9 those typically when she was going through the 10 lobby or passed the concierge desk on her way out 11 or coming back in from being out someplace? 12 MS. VASQUEZ: Objection; calls for 13 speculation. 14 A I mean, the interactions that I've had 15 with her was she needed things from me, so it 16 wasn't like in passing too many times. I've seen 17 her in passing, but the majority of the times 18 where I had interactions was she needed dry 19 cleaning or she had something to come and dry 20 clean or she wanted to pick up a package or 21 something of that nature. 22 Q All right. How many times would you say</p>	<p>88</p> <p>1 MS. VASQUEZ: Objection; vague -- vague 2 and ambiguous. What do you mean by pictures? Of 3 whom? What? 4 Q I'm going to ask you to take a look at -- 5 MS. BREDEHOFT: Alex, if you can bring up 6 Harrell Exhibit 5, please. 7 While we're doing that, just so we have a 8 record here, I'm going to move the admission of 9 Harrell Exhibit 2. 10 Q Mr. Harrell, I'm going to show you what 11 has been marked as Harrell Deposition Exhibit 5. 12 Do you recognize the person in this picture? 13 A Yes. 14 Q And do you see the date on here? 15 MS. BREDEHOFT: Alex, I'm going to ask to 16 take control, if I may. 17 Q I'm going to ask you to take a look at the 18 date and time on that May 21st, 2016, at 9:24 p.m. 19 Have you ever seen this picture before? 20 A I have not. 21 Q Did anyone in the course of the 22 depositions or in questioning you about the</p> <p>F/A</p>

R, F/A,
SP, Lack
of Pers.
Know.,
Improper
Opinion

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1 interactions with Amber Heard ever show you this?
2 **A No.**
3 MS. BREDEHOFT: I'll move for the
4 admission of Harrell Exhibit 5.
5 Alex, could you please take me to Harrell
6 Exhibit 6.
7 **Q Mr. Harrell, I'm going to ask you to take**
8 **a look at what has been marked as Harrell**
9 **Exhibit 6. And I'm going to ask you to take a**
10 **look at this and the date is May 21st, 9:25 p.m.**
11 **Have you ever seen this picture before?**
12 **A No. Did it change?**
13 **Q It's a different picture.**
14 **A No, I've never seen that picture.**
15 **Q And do you recognize that as Amber Heard?**
16 **A Yes.**
17 MS. BREDEHOFT: Move the admission of
18 Harrell Exhibit 6. Alex, if you could take that
19 down and put up Harrell Exhibit 7, please.
20 **Q Mr. Harrell, I'm going to ask that you**
21 **take a look at what has been marked as Harrell**
22 **Exhibit 7.**

R, F/A,
SP, Lack
of Pers.
Know.,
Improper
Opinion

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1 MS. BREDEHOFT: And Alex if I can -- yeah,
2 thank you.
3 **Q This is also dated May 21st at 11:57 p.m.**
4 **Do you recognize the person in this picture?**
5 **A Yes, I do recognize. That's Amber.**
6 **Q That's Amber Heard; is that correct?**
7 **A Yes.**
8 **Q Has anyone ever shown you this picture**
9 **before?**
10 **A No.**
11 **Q Move the admission of Harrell Exhibit 7.**
12 **I'm then going to --**
13 MS. BREDEHOFT: Alex, I'm going to ask you
14 to pull up Harrell Exhibit 8.
15 **Q And while Alex is bringing that up,**
16 **Mr. Harrell, Mr. Harrell did anybody ever show you**
17 **any video footage of Mr. Depp from the evening of**
18 **May 21st, 2016?**
19 **A No.**
20 MS. BREDEHOFT: And Alex, if you could
21 bring up Harrell Exhibit 8. And it's a video, so
22 we're going to need to play it as well.

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1 If I didn't say it, I'm moving for the
2 admission of Harrell Exhibit 7.
3 **Q Okay. Now, let me just -- before we start**
4 **the playing of this, Mr. Harrell, I'm going to**
5 **direct your attention to this bottom left-hand**
6 **corner, where it has camera two, 5/21/2016 at**
7 **20:28:45, do you see that?**
8 **A Yes.**
9 **Q And were the timestamps on the cameras at**
10 **that time, would that have indicated 8:28 p.m.?**
11 **A Yes.**
12 MS. BREDEHOFT: Okay. And now I'm going
13 to ask you, Alex, if you can play this video for
14 Mr. Harrell.
15 **Q Do you recognize that individual?**
16 **Mr. Harrell, do you recognize Mr. Depp?**
17 **A Yeah, that's him.**
18 **Q Do you recognize the two other individuals**
19 **with him?**
20 **A Not by name. I mean I recognize them, I'm**
21 **pretty sure I've seen them on camera with him or**
22 **with -- with people of his team, but I couldn't**

R, F/A,
SP, Lack
of Pers.
Know.,
Improper
Opinion

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1 **tell you their names.**
2 **Q Did anybody ever show you that video**
3 **before today when I've shown you?**
4 MS. VASQUEZ: Objection; asked and
5 answered.
6 **A No.**
7 MS. BREDEHOFT: I'm going to move the
8 admission of Harrell Exhibit 8.
9 **Q And while I just have you here for a**
10 **minute. Mr. Harrell, was -- the timestamps, were**
11 **they always perfectly in sync or did occasionally**
12 **they get off by a couple of minutes one way or the**
13 **other for these security cameras that you're aware**
14 **of?**
15 MS. VASQUEZ: Objection; calls for
16 speculation.
17 **A As far as I am concerned it's pretty spot**
18 **on. They're live.**
19 **Q Okay. You're not aware of any occasion**
20 **where they got off a little bit and had to be**
21 **reprogrammed or synchronized to get them back on**
22 **track?**

Transcript of Cornelius Harrell
Conducted on January 13, 2021

24 (93 to 96)

<p>93</p> <p>1 MS. VASQUEZ: Objection; vague and 2 ambiguous. 3 A I am not aware of those circumstances. 4 Q Okay. Thank you. Now, has anyone told 5 you before -- has anyone told you or were you 6 aware that there were occasions of domestic 7 violence by Mr. Depp against Ms. Heard prior to 8 May 21st? 9 MS. VASQUEZ: Objection; compound; assumes 10 facts not in evidence; calls for hearsay. 11 A I'm not aware of anything like that. 12 Q And is it fair to say that no one has 13 suggested to you or told you that there were 14 allegations of domestic violence by Mr. Depp 15 against Ms. Heard prior to May 21st, 2016? 16 MS. VASQUEZ: Objection; asked and 17 answered. 18 A Correct. 19 MS. BREDEHOFT: Okay. Alex, can you 20 please bring up Harrell Exhibit 9, please. 21 Q Mr. Harrell, going to ask you to look at 22 what has been marked as Harrell Exhibit 9. Do you</p>	<p>95</p> <p>1 going to ask you, Alex, if you could bring up 2 Harrell Exhibit 11. 3 Q Mr. Harrell, I'm going to -- 4 MS. BREDEHOFT: I'm going to move for the 5 admission of Harrell Exhibit 10. 6 Q Mr. Harrell, I'm going to ask you to take 7 a look at plaintiff -- or Harrell Exhibit 11. Do 8 you recognize the person in this picture? 9 A Yes, I do recognize that as Amber Heard. 10 Q And have you ever been shown that picture 11 before? 12 A I have not. 13 MS. BREDEHOFT: I move for the admission 14 of Harrell Exhibit 11. Alex, can you please pull 15 up Harrell Exhibit 12. 16 Q Mr. Harrell, I'm going to ask you to take 17 a look at what's been marked as Harrell 18 Exhibit 12. Do you recognize the person in this 19 picture? 20 A Yes, Amber Heard. 21 Q And have you ever been shown this document 22 before?</p>
<p>94</p> <p>1 recognize the person in this photo? 2 A Yes. 3 Q And who is that? 4 A Amber Heard. 5 Q Have you ever seen this picture before? 6 A I have not. 7 MS. BREDEHOFT: I'd move the admission of 8 Harrell Exhibit 9. Alex, can you please bring up 9 for me Harrell Exhibit 10. 10 Q Mr. Harrell, going to ask you if you can 11 take a look at Harrell Exhibit 10. And do you 12 recognize the person in this picture? 13 A Yes, I do recognize the person. Amber 14 Heard. 15 Q And who is that? Amber Heard, did you 16 say? I'm sorry. 17 A Yes. 18 Q Okay. And have you ever seen -- has 19 anyone ever shown you this picture before? 20 A No. 21 MS. BREDEHOFT: Okay. I'm going to move 22 for the admission of Harrell Exhibit 10. I'm</p>	<p>96</p> <p>1 A I have not. 2 MS. BREDEHOFT: I'm going to move the 3 admission of Harrell Exhibit 12. And, Alex, can 4 you bring up Harrell Exhibit 13, for me, please. 5 Q Mr. Harrell, I'm going to ask you to take 6 a look at what has been marked as Harrell 7 Exhibit 13. Do you recognize the person in this 8 picture? 9 A Yes, that's Amber Heard. 10 Q And have you ever been shown this picture 11 before? 12 A I have not. 13 MS. BREDEHOFT: I'd move for the admission 14 of Harrell Exhibit 14 -- 13, I think that is; 15 right? And, Alex, can you bring up Harrell 16 Exhibit 14. 17 Q Mr. Harrell, I'm going to ask you to take 18 a look at what has been marked as Harrell 19 Exhibit 14. Do you recognize the person in this 20 document? 21 A I can't really see much of a photo there. 22 I literally see an eyelash and eyebrow and hair.</p>

Lack of
Pers.
Know.,
Improp.
Opinion,
R, F/A,
SP

R

R, F/A,
SP, Lack
of Pers.
Know.,
Improp.
Opinion

R, F/A
SP,
Lack of
Pers.
Know.,
Improp
Opinion

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1 **It looks like Amber, but I mean, I can barely --**
2 **that could be anyone.**
3 Q Okay. All right. That's fair. And have
4 you ever been shown this picture before?
5 **A I have not.**
6 MS. BREDEHOFT: I'd move for the admission
7 of Harrell Exhibit 14. And then, Alex, if you
8 could bring up Harrell Exhibit 15, please.
9 Q Mr. Harrell, I'm going to ask you to take
10 a look at what's been marked as Harrell
11 Exhibit 15. Do you recognize the person in this
12 picture?
13 **A Yes, that's Amber Heard.**
14 Q Okay. And have you ever been shown this
15 picture before?
16 **A I have not.**
17 MS. BREDEHOFT: I'd move for the admission
18 of Harrell Exhibit 15. Alex, if you could bring
19 up Harrell 16 for me.
20 Q Mr. Harrell, I'm going to show you what
21 has been marked as Harrell Exhibit 16. Do you
22 recognize the person in this photo?

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1 **A Yeah, that looks like the same series of**
2 **photos of Amber Heard.**
3 Q When you say the same series, do you have
4 any reason to believe these are all from the same
5 occasion?
6 **A No, but they all kind of look the same,**
7 **different angles in certain pictures, and this is**
8 **half of a face, so I feel like it's easy to assume**
9 **that this is just a combination of the same**
10 **person.**
11 Q Do you know whether these pictures were
12 taken over a period of time in different incidents
13 or whether they were on the same occasion?
14 **A I have no idea, I just -- they look very**
15 **similar. And it's just --**
16 Q So have you ever --
17 **A What's that? Go ahead.**
18 Q No, I was just going to say, have you ever
19 been seen this picture -- have you ever been shown
20 this picture before?
21 **A I've never seen this photo.**
22 MS. BREDEHOFT: Okay. I'm going to move

99
1 the admission of Harrell Exhibit 16.
2 Q Now, you indicated -- let me see if I can
3 ask this just to move this along a little bit
4 faster. You were asked to provide a witness
5 statement for the UK in the matter of Johnny Depp
6 versus The Sun newspaper and Mr. Morton, do you
7 recall that?
8 **A Yes.**
9 Q Who prepared the witness statement?
10 MS. VASQUEZ: Objection; vague and
11 ambiguous. Prepared?
12 Q Who drafted the witness -- let me just ask
13 that clean.
14 Who drafted your witness statement for the
15 UK proceedings?
16 **A I don't recall. One of the requesters.**
17 Q Was it a lawyer for Mr. Depp?
18 **A I'm not exactly sure. I wasn't aware of**
19 **who was representing who. I think I just got an**
20 **email. I work at the Eastern Columbia very, very**
21 **seldomly. They emailed me on the Eastern**
22 **Columbia's email platform, and I was there one day**

Lack of
Pers.
Know., L,
R, SP, F/A

100
1 and I'd seen it was in the inbox for a very long
2 time. And I looked at it and I didn't agree with
3 some of the things and I shot it back to the
4 person and they revised it and they -- and then I
5 accepted it for that.
6 Q So somebody emailed you a draft written
7 statement; is that correct?
8 **A Correct.**
9 Q Okay. Do you remember the name Adam
10 Waldman?
11 **A Not off the top of my head, I don't.**
12 Q Do you recall whether Adam Waldman was the
13 person who drafted your witness statement?
14 **A It could be, I'm not exactly sure.**
15 Q Okay. Did you ever speak with the person
16 who drafted your witness statement?
17 **A I believe someone contacted me and asked**
18 **me to check my email. Because again, I work at**
19 **that building very rarely, but someone physically**
20 **called me and they asked me to check my email**
21 **because they sent me something. And then I**
22 **remember there was sometime before I think I got**

<p>101</p> <p>1 it back to them so they called me again to just 2 kind of review and send it over, but it wasn't 3 anything to alter or to talk or discuss any 4 details. 5 Q Did anyone call you to discuss the details 6 before you received the first draft of the witness 7 statement? 8 A No. 9 Q And after you said there was a couple of 10 details you wanted to correct and you sent it 11 back, did anyone call you to talk to you about 12 those corrections? 13 A No. 14 Q I'm going to ask you to take a look at 15 Harrell Exhibit 3. 16 MS. BREDEHOFT: Alex, I guess -- sorry, I 17 should have told you. Can you bring that up, 18 please. Thanks. Okay. 19 Q So, Mr. Harrell, I'm going to ask you to 20 take a look at what has been marked as Harrell 21 Exhibit 3. And it's called the first witness 22 statement of Cornelius Harrell, that's you;</p>	<p>103</p> <p>1 Q Would you like to take a moment and read 2 through this? 3 A Yeah, if you could just slowly because 4 I'm, like, thinking. 5 Q Yeah. Tell me if I'm going too fast. I 6 can slow it down. 7 A I'm sorry, go up a little bit, because all 8 this is unfamiliar to me. I'm just -- I do not 9 know the full details... 10 So all of these statements, what I said 11 are, because I'm familiar with D, E, F, G, I have 12 no idea what that is all about. That's the first 13 time I'm kind of seeing that. All of that, I'm 14 not familiar with it all. What part did I say? 15 Q Well, it says, if we look real quickly 16 here, I do not know the full details of the 17 claimant's claims made against the defendants; 18 however, I've been shown paragraphs 8D through M 19 of the defendants amended defense; is that 20 correct? Did somebody show you paragraphs 8D 21 through M, which are then repeated down below 22 here? I'm sorry -- my apologies, I'm trying to --</p>
<p>102</p> <p>1 correct? 2 A Yes. 3 Q Okay. And I'm going to ask you if you can 4 take a look at this for a moment. And do you -- 5 as you go through this, is this -- if you can go 6 to the last page -- 7 MS. BREDEHOFT: And, Alex, maybe if I can 8 take control, would that be okay? Okay. Thank 9 you. 10 Q I'm going to ask you to go to the last 11 page. And is this your signature? 12 A It looks like it could be. I mean, that's 13 not really my signature, but I mean, I could've -- 14 Q It's dated 12 December 2019. Do you have 15 any recollection of signing something in that time 16 frame -- signing something, let me be more 17 specific. Signing this witness statement? 18 MS. VASQUEZ: I think it might be helpful 19 to the witness if we let him read it or at 20 least -- 21 Q Would you -- 22 A What was that?</p>	<p>104</p> <p>1 I lost it there for a second. Go back up. I lost 2 it there for a second. 3 So did somebody show you these in a 4 pleadings, this D-E-F-G-H-I-J-K-L-M? Do you 5 recall anyone showing you a pleading that had 6 these allegations? 7 A I don't. 8 Q Okay. And then it says the purpose of 9 this witness statement is to comment on those 10 paragraphs, referring to these above, do you see 11 that? 12 A Yes. 13 Q Okay. Now, the first of those paragraphs, 14 I'll take you through them, the first of those, is 15 the next time Ms. Heard saw the claimant is on 16 21 May 2016. He arrived at the South Broadway 17 apartment at around 7:15 p.m. He was drunk and 18 high. Ms. Heard was present together with 19 Elizabeth Marz, Raquel Rose Pennington, and 20 Ms. Pennington's fiancé, Joshua Drew. 21 Ms. Pennington and Mr. Drew lived in a neighboring 22 apartment and Ms. Pennington kept a key to the</p>

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1 South Broadway apartment. Do you know whether
2 that's true or false?

3 MS. VASQUEZ: Objection. The document
4 speaks for itself. It's compound. It's vague and
5 ambiguous. What -- what exactly are you asking
6 him?

7 Q Mr. Harrell -- Mr. Harrell, are you able
8 to testify to whether any aspect of this statement
9 D, 4D in your witness statement, is true or false?

10 **A I don't know anything about that**
11 **statement.**

12 Q Okay. I'm going to now turn your to
13 attention to E, the one below it, during a
14 conversation with Ms. Heard, the claimant became
15 very angry. Ms. Heard tried to calm him down by
16 telephoning one of his trusted employees and
17 asking him to intervene, but this was
18 unsuccessful. Do you have any knowledge of this?

19 **A I remember this throughout one of the**
20 **depositions I was at, I remember them saying this**
21 **specific thing, but wasn't so formally said like**
22 **that, but I've heard that before.**

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1 Q Do you have any knowledge of whether this
2 is true or false or are you able to testify as to
3 whether the statements made in paragraph E are
4 true or false?

5 MS. VASQUEZ: Objection; vague; ambiguous;
6 compound; assumes facts not in evidence; lack of
7 foundation. The document speaks for itself,
8 Elaine.

9 **A I am not able to testify if that's true or**
10 **false.**

11 Q Thank you. I'm going to ask you now to
12 turn to paragraph F. The claimant became
13 increasingly enraged. Ms. Heard became concerned
14 for her safety and texted Ms. Pennington, who was
15 by now in her apartment next door asking
16 Ms. Pennington to come back over.

17 Do you have any knowledge of these
18 statements?

19 MS. VASQUEZ: Same objections.

20 Q Or these events that are being reported?

21 MS. VASQUEZ: Same objections. Compound.

22 **A I -- I've heard that also in a deposition,**

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1 **but I -- I don't have any -- anything to say. I'm**
2 **not certain of any of those occurrences.**

3 Q Are you able to say whether these
4 statements are true or false or to testify to
5 whether these statements in paragraph F are true
6 or false?

7 MS. VASQUEZ: Objection; compound; assumes
8 facts not in evidence; lacks foundation; document
9 speaks for itself.

10 **A I am not able to.**

11 Q All right. Then I'm going to take you to
12 G, paragraph G here, and it says, the claimant
13 insisted that Ms. Heard call their friend iO
14 Tillet Wright, which Ms. Heard attempted to do.
15 The claimant ripped the phone from Ms. Heard's
16 hand and began screaming profanities and insults.
17 The claimant then tossed the phone away and
18 stormed upstairs. Ms. Heard picked it up and
19 Ms. Wright yelled over the phone to Ms. Heard to
20 get out of the house. After a short period
21 upstairs, the claimant came back down the stairs,
22 then grabbed the phone again, and this time threw

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1 it at Ms. Heard, striking her cheek and eye.
2 Ms. Heard sustained an injury to her right eye.
3 Ms. Pennington subsequently took a photograph of
4 the injury as well as of items which the claimant
5 smashed.

6 Do you see that? That's written -- did I
7 read that accurately from paragraph G?

8 **A Yes.**

9 Q Okay. Do you have any knowledge of any of
10 the facts alleged in G?

11 MS. VASQUEZ: Objection.

12 **A I have no --**

13 Q I'm sorry?

14 **A I have no knowledge of that occurrence.**

15 Q Are you able to testify to whether any of
16 the statements in paragraph G are true or are
17 false?

18 **A I am not.**

19 MS. VASQUEZ: Objection. Same objections
20 as prior.

21 Q Okay. I'm now going to go to paragraph H.
22 Ms. Heard covered her face and was crying with

L, R,
H,
F/A

L, R, H,
F/A

L, R,
F/A,
H

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1 pain. The claimant charged at her. He forcibly
2 pulled back her hair, and Ms. Heard attempted to
3 get up from the sofa. Ms. Heard called out, call
4 911, hoping this would be heard by Ms. Wright, who
5 was still on the phone. The claimant shouted, I
6 hit your eye? I hit your eye, huh? Let me see
7 your eye. Let me see. Let me see your eye. What
8 if I pulled your hair back? Let's see how hard I
9 hit you, and pulled Ms. Heard's hair, struck
10 Ms. Heard, and violently grabbed her face. The
11 claimant started to slap, shake, and yank
12 Ms. Heard around the room while she continued to
13 scream.
14 Do you have any knowledge of any of the
15 statements in this paragraph H?
16 **A I do not. That's, like, the first time**
17 **I've really, like, seen that or heard that.**
18 Q Are you able to testify to whether any of
19 the allegations in paragraph H are true or false?
20 MS. VASQUEZ: Same objections.
21 **A I am not.**
22 Q I'm going to ask you now to turn to

110
1 paragraph I of Harrell Exhibit 3. It says
2 Ms. Pennington entered the flat, at which point
3 Ms. Heard escaped from the claimant's grasp and
4 moved to the other side of the room. The claimant
5 charged at Ms. Heard again. Ms. Pennington ran
6 between them, extending her arms to separate them,
7 and begged the claimant to stop. The claimant
8 then grabbed Ms. Pennington's arms and continued
9 to yell obscenities.
10 Do you have any knowledge of the
11 statements made in paragraph I?
12 **A I do not.**
13 Q Are you able to testify to whether any of
14 the statements that were made in I are true or
15 false?
16 **A I am not.**
17 MS. VASQUEZ: Same objections.
18 Q I'm going to ask you now to take the --
19 take a look at paragraph J. Ms. Heard then
20 retreated to the couch. Ms. Pennington came over
21 and covered Ms. Heard in a protective posture.
22 The claimant picked up the magnum-sized bottle and

111
1 began drinking out of it and swinging it around,
2 smashing everything he could. Do you have any
3 knowledge of this paragraph?
4 **A I do not.**
5 Q And are you able to testify to whether any
6 of the statements made in paragraph J are true or
7 false?
8 **A I am not.**
9 MS. VASQUEZ: Same objections.
10 Q Now I'm going to go to paragraph K. It
11 says, the claimant then moved closer and closer to
12 Ms. Heard, acting in a threatening manner. By
13 this time, members of the claimant's security
14 team, including Jerry -- Judge Jerry had entered
15 the flat. Ms. Heard yelled at Mr. Jerry to help
16 her and said that if claimant hit her again she
17 would call the police.
18 Do you have any knowledge of the
19 statements made in paragraph K?
20 **A I do not have any knowledge and I can't**
21 **testify.**
22 Q All right. Are you able to testify

112
1 whether these statements made in paragraph K are
2 true or false?
3 MS. VASQUEZ: Same objections.
4 **A I cannot.**
5 Q Thank you. I'm going to ask you now to
6 take a look at paragraph 11. As the claimant
7 walked down the hallway, he smashed other items
8 and kicked a hole in a door. He went into an
9 adjoining apartment, which Ms. Heard used as an
10 office, painting studio, and closet, where
11 Ms. Heard heard him smashing further items and
12 screaming.
13 Do you have any knowledge of these
14 statements in paragraph 11?
15 **A I do not.**
16 Q And are you able to do testify to whether
17 any of these statement are true or false?
18 MS. VASQUEZ: Same objections.
19 **A I do not.**
20 Q Now we're down to paragraph M. If I get
21 myself back here again. Sorry about that.
22 Mr. Drew and Ms. Pennington then took

L, R, H,
F/A

113
1 Ms. Heard into their apartment to keep her safe
2 from the claimant.
3 Do you have any knowledge of this?
4 A I do not.
5 Q And are you able to testify to whether the
6 statement made in paragraph M is true or false?
7 A I'm not.
8 Q Now, do you have any explanation for the
9 statement, paragraph 5, the purpose of this
10 witness statement is to comment on those
11 paragraphs?
12 MS. VASQUEZ: Objection; vague and
13 ambiguous.
14 Q Do you have any understanding what this
15 means?
16 MS. VASQUEZ: Same objections.
17 A I mean, reading it now, yeah, it's to
18 comment on the above paragraphs.
19 Q Well, are you able to comment on the above
20 paragraphs? We just went through it, and I
21 believe you testified as to each of these
22 paragraphs you had no knowledge and aren't able to

L, R, H,
F/A

114
1 testify to whether they're true or false; is that
2 accurate?
3 A Yes.
4 Q So you wouldn't be able to comment on
5 those paragraphs, would that be accurate to say?
6 MS. VASQUEZ: Objection; argumentative.
7 A Correct.
8 Q I'm trying to -- okay. Now, I'm going to
9 -- now, you indicated in paragraph six that you
10 have known Ms. Heard to be a prior resident of the
11 Eastern, and you've seen her both in person on
12 around three occasions that are on security
13 footage and around five occasions during the
14 course of your duties and you don't know her
15 outside of the relationship and you've never
16 spoken with her in relation to her personal life;
17 is that correct?
18 A Correct.
19 Q Okay. Do you have a recollection of
20 whether you edited or made any changes to
21 paragraph 6 based on -- and what I'm asking you is
22 when you received this witness statement and you

115
1 said you made some comments or changes, did you
2 make any changes to paragraph 6?
3 A I don't recall.
4 Q Okay. And then you talk about your
5 duties. And here it says in paragraph 7 -- I'm
6 just going to bring your attention to a particular
7 part -- I do not review past security footage,
8 although the security system would allow me to do
9 if required. Due to the nature of my employment
10 at the Eastern, I do not have any regular working
11 hours. Do you see that?
12 A Yes.
13 Q Okay. And so here you're saying you do
14 not review past security footage. What do you
15 mean by that?
16 A We don't have to, like, rewind the footage
17 and review it or anything like that. There's no
18 duty to do that. It's not like a mandated duty to
19 review the footage.
20 Q Okay. And now I'm going to go to
21 paragraph 8. And it says, it is alleged in the
22 defendant's amended defense that on Saturday 21

116
1 May 2016, Mr. Depp committed a number of acts of
2 domestic violence against Ms. Heard. Now, you
3 read that statement above, and would you agree
4 that if those were true, that would be acts of
5 domestic violence against Ms. Heard by Mr. Depp?
6 A Yes, if those statements were true.
7 Q Okay. And now it has you saying on
8 Sunday 22 May 2016, I was on duty at the Eastern.
9 My shift ran from 8:00 a.m. to 4:00 p.m. on this
10 date. At approximately 1:00 p.m., Ms. Heard
11 approached me at the front desk with her dog. Do
12 you recall -- do you recall that happening?
13 A Yeah, I do remember something like that
14 happening, yes.
15 Q Okay. Now, what -- was Ms. Heard -- was
16 the dog on a leash?
17 A I don't think so.
18 Q Was she just holding it in her hand?
19 A I think she was at first and then she let
20 it down.
21 Q Okay. So it was walking -- when it was
22 walking around, do you recall whether it just

L, R, H,
SP, F/A,
Lack of
Pers.
Know.,
Improper
Opinion

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L, R, H
F/A

<p>117</p> <p>1 stayed close to her, well-trained?</p> <p>2 A I don't recall that much of the</p> <p>3 interaction.</p> <p>4 Q All right. And then she told me she</p> <p>5 needed to pick up a delivery of wine. I took</p> <p>6 Ms. Heard to the mail room and commented on her</p> <p>7 dog. Sorry about that -- I got to get better</p> <p>8 about this, my apologies.</p> <p>9 Commented on her dog before sorting</p> <p>10 through the packages to identify her delivery.</p> <p>11 Ms. Heard and I spoke for approximately eight</p> <p>12 minutes to total. During our conversation,</p> <p>13 Ms. Heard and I could not have been more than one</p> <p>14 foot apart due to the confines in the mail room.</p> <p>15 Ms. Heard appeared to be wearing very minimal or</p> <p>16 no makeup at this time.</p> <p>17 Was that drafted into your witness</p> <p>18 statement, that she appeared to be wearing very</p> <p>19 minimal or no makeup at this time?</p> <p>20 MS. VASQUEZ: Objection; vague and</p> <p>21 ambiguous; lacks foundation; document speaks for</p> <p>22 itself.</p>	<p>119</p> <p>1 brain, and there was very little to no makeup.</p> <p>2 Q So what -- when you say very little, what</p> <p>3 do you mean?</p> <p>4 A Possibly like concealer and powder.</p> <p>5 Q Okay.</p> <p>6 A Not like a full face with contour or</p> <p>7 anything like that. It was literally like light</p> <p>8 makeup. She had a little bit of makeup on. Very</p> <p>9 natural faced.</p> <p>10 Q Okay. Would you say in the other times</p> <p>11 that you saw Ms. Heard that that was a common</p> <p>12 makeup routine for her, the concealer and the</p> <p>13 powder and more of a fresh faced look?</p> <p>14 A Thinking about it, no. I've seen her at</p> <p>15 different times. My interactions were very</p> <p>16 minimal with her, but that day she was going</p> <p>17 somewhere. So it was a little bit of a fresh</p> <p>18 faced makeup, no makeup look, but I've also seen</p> <p>19 her bringing me something to be dry cleaned and</p> <p>20 she had absolutely no make up on and she looked</p> <p>21 different.</p> <p>22 But I have -- I don't know how long this</p>
<p>118</p> <p>1 Q Did you write that or did someone else?</p> <p>2 A Someone else probably wrote that.</p> <p>3 Q Okay. Now, the very first time you ever</p> <p>4 were asked about your interaction with Ms. Heard</p> <p>5 based on the earlier question was almost two and a</p> <p>6 half months after the interaction. Do you even</p> <p>7 recall whether Ms. Heard was wearing make up?</p> <p>8 A Do I recall?</p> <p>9 MS. VASQUEZ: Objection; vague and -- I'm</p> <p>10 sorry, Mr. Harrell. Objection; vague and</p> <p>11 ambiguous as to time. You can answer, I suppose,</p> <p>12 if you understand it.</p> <p>13 A Do I recall her wearing make up? No, but</p> <p>14 I remember being asked about this a lot. They did</p> <p>15 show me pictures of her. They showed me regular</p> <p>16 what looked to be a headshot picture when I got to</p> <p>17 one of the depositions and they asked me various</p> <p>18 questions about makeup and lighting. I'm very</p> <p>19 familiar with women who wear make up and don't.</p> <p>20 And can I recall if she was wearing makeup? Yeah,</p> <p>21 I kind of remember, because this whole situation</p> <p>22 years later embedded the whole interaction in my</p>	<p>120</p> <p>1 is going to take, but I have a very important</p> <p>2 thing to do at 4:00 p.m. I was very clear with</p> <p>3 that. And I don't know if we can part two this,</p> <p>4 but I have to go.</p> <p>5 Q Mr. Harrell, I'm sorry, I wasn't aware of</p> <p>6 that. Can you come back on for a second? Is this</p> <p>7 this interview that you were talking about? What</p> <p>8 -- how long will this take? I'm sorry.</p> <p>9 A I'm not exactly sure. I think it will</p> <p>10 take less than 30 minutes, but I absolutely have</p> <p>11 to do it and I literally just got a call. And I</p> <p>12 have to. And I was very clear and I was able to</p> <p>13 reschedule this, but again as I told at the</p> <p>14 beginning of this, I'm in transition of a job and</p> <p>15 I think it's very important to me in order to do</p> <p>16 what I need to do in order to further my life.</p> <p>17 Q Well, I'm perfectly fine to take a half</p> <p>18 hour break and come back to finish this up.</p> <p>19 MS. BREDEHOFT: Counsel, do you have any</p> <p>20 problems with that, counsel for Mr. Depp?</p> <p>21 MS. VASQUEZ: Well, I mean, Mr. Harrell --</p> <p>22 why don't we go off the record and discuss this</p>

R

Transcript of Cornelius Harrell
Conducted on January 13, 2021

31 (121 to 124)

<p>121</p> <p>1 off the record.</p> <p>2 THE VIDEOGRAPHER: Okay. It is 7:01 p.m.</p> <p>3 We go off the record.</p> <p>4 (Off the record from 7:01 p.m. to 7:17</p> <p>5 p.m.)</p> <p>6 THE VIDEOGRAPHER: So it is the beginning</p> <p>7 of media number two in the testimony of Cornelius</p> <p>8 Harrell. It is 7:17 p.m. We're back on the</p> <p>9 record. You may start.</p> <p>10 MS. BREDEHOFT: Thank you. I think we --</p> <p>11 and I think, Alex, do we have the exhibit back?</p> <p>12 Can we get the exhibit back, Exhibit 3, Harrell 3?</p> <p>13 And, Alex, I may need your help. For some reason</p> <p>14 my screen has disappeared. What have I done?</p> <p>15 It's got just a one liner here.</p> <p>16 PLANET DEPOS TECHNICIAN: This is Alex,</p> <p>17 the tech speaking.</p> <p>18 MS. BREDEHOFT: Yes.</p> <p>19 PLANET DEPOS TECHNICIAN: Can you describe</p> <p>20 what's going on with your screen, Elaine?</p> <p>21 MS. BREDEHOFT: I have one line. It's got</p> <p>22 me and Camille and Mr. Harrell and the court</p>	<p>123</p> <p>1 -- now I have the people but I don't have</p> <p>2 Mr. Harrell. Hold on, let me work on this.</p> <p>3 Okay, I'm good enough. I've got it.</p> <p>4 PLANET DEPOS TECHNICIAN: Okay. Just</p> <p>5 Since we adjourned you're going to have to re-pin</p> <p>6 Mr. Harrell when you have a moment.</p> <p>7 MS. BREDEHOFT: Okay.</p> <p>8 PLANET DEPOS TECHNICIAN: If you can see</p> <p>9 his video now, you should be able to access that</p> <p>10 drop down menu, the pin feature.</p> <p>11 MS. BREDEHOFT: I got it. Perfect. Thank</p> <p>12 you.</p> <p>13 PLANET DEPOS TECHNICIAN: Sure.</p> <p>14 MS. BREDEHOFT: All right. Okay. And I'm</p> <p>15 going to ask to take control back of the screen.</p> <p>16 Q So, Mr. Harrell, when you -- when we left</p> <p>17 we were just talking about paragraph number eight.</p> <p>18 And I think you had just finished testifying about</p> <p>19 the type of makeup she was wearing and that you</p> <p>20 recall another occasion where she was wearing</p> <p>21 absolutely none but she had concealer and powder I</p> <p>22 think on on this occasion, is that your best</p>
<p>122</p> <p>1 reporter, it looks like Paul, and it's just one</p> <p>2 line and I don't -- I'm not big again so that I</p> <p>3 have the exhibit up.</p> <p>4 PLANET DEPOS TECHNICIAN: Well, I -- When</p> <p>5 you said you were having an issue, I took the</p> <p>6 exhibit back down. Would you like me to put it</p> <p>7 back up so we can see what it looks like for you?</p> <p>8 MS. BREDEHOFT: Yeah, let's see if that --</p> <p>9 that solved it.</p> <p>10 PLANET DEPOS TECHNICIAN: All right.</p> <p>11 MS. BREDEHOFT: Thank you.</p> <p>12 PLANET DEPOS TECHNICIAN: Certainly.</p> <p>13 How's that?</p> <p>14 MS. BREDEHOFT: No, I disappeared again.</p> <p>15 As soon as you put it up I disappeared. I can't</p> <p>16 see anything, including that.</p> <p>17 PLANET DEPOS TECHNICIAN: So your screen</p> <p>18 is black, is that --</p> <p>19 MS. BREDEHOFT: No, I have my desktop in</p> <p>20 the back. Wait, wait, wait, okay. I had to check</p> <p>21 -- okay. I'm in better shape now except for I've</p> <p>22 got that on the screen but I don't have any of the</p>	<p>124</p> <p>1 recollection?</p> <p>2 A Yes.</p> <p>3 Q Okay. Now, it says here that I did not</p> <p>4 notice any bruising, cuts, swelling, red marks, or</p> <p>5 any other injuries of any kind on Ms. Heard's face</p> <p>6 or body. Were you looking for bruises, cuts,</p> <p>7 swelling, red marks, or other injuries on</p> <p>8 Ms. Heard's body during this interaction?</p> <p>9 A I was not.</p> <p>10 Q In fact, you had no idea about the events</p> <p>11 from the night before, did you?</p> <p>12 MS. VASQUEZ: Objection --</p> <p>13 A Correct.</p> <p>14 MS. VASQUEZ: -- assumes facts not in</p> <p>15 evidence; vague and ambiguous. Mr. Harrell, if</p> <p>16 you would just let me complete my objections</p> <p>17 before answering, I would very much appreciate</p> <p>18 that. I apologize for interrupting you.</p> <p>19 Q Okay. So -- and you said -- you said</p> <p>20 correct; is that right? I just want to make sure</p> <p>21 I got your statement. You were not aware of any</p> <p>22 events from the night before so there wasn't</p>

R

R

R	<p>125</p> <p>1 anything that you were trying to look for or</p> <p>2 determine whether it was there; is that correct?</p> <p>3 A Correct.</p>	<p>127</p> <p>1 play it because I don't even know that I know how</p> <p>2 to -- I may take control because there's a part</p> <p>3 that I want to stop on. So I may take control,</p>
L, R, H F/A	<p>4 Q Okay. Now, you also said here, around an</p> <p>5 hour later I saw Ms. Heard on the security camera</p> <p>6 on the elevator. Ms. Heard was with another</p> <p>7 individual I did not know or recognize. I do not</p> <p>8 recall whether this individual was male or female</p> <p>9 and she hugged the other individual. From the</p> <p>10 security footage, I did not notice any bruises,</p> <p>11 cuts, swelling, red marks, or any other injuries</p> <p>12 of any kind to Ms. Heard's face or body.</p> <p>13 Who wrote that?</p> <p>14 MS. VASQUEZ: Objection; the document</p> <p>15 speaks for itself; lack of foundation.</p> <p>16 A I'm not -- I didn't write that.</p> <p>17 Q Right. Did you write this one up here, I</p> <p>18 did not notice any bruises, cuts, swelling of any</p> <p>19 kind on Ms. Heard's face or body on number eight?</p> <p>20 A That might have been a drafted, because it</p> <p>21 was drafted and I just fixed a couple things. I</p> <p>22 don't remember it saying all this.</p>	<p>4 but go ahead and play it and then if you can give</p> <p>5 me control while it's playing.</p> <p>6 There's going to be a few minutes here at</p> <p>7 the beginning where there's less going on.</p> <p>8 Q But Mr. Harrell, are you the person that's</p> <p>9 sitting -- do you recognize yourself sitting in</p> <p>10 the concierge desk area?</p> <p>11 A Not at the moment. It very well could be</p> <p>12 me. Once it moves I'm pretty sure I could see.</p> <p>13 Q Okay.</p> <p>14 A Because I can't see a face at all, I just</p> <p>15 see a shoulder.</p> <p>16 Q While we're waiting, do you see it's</p> <p>17 May 22nd, 2016, 13:00, that's 1:00 p.m.; correct?</p> <p>18 All right. Now, I'm going to pause it for a</p> <p>19 minute. Do you recognize who this person is?</p> <p>20 A I mean, not from this thing. If you just</p> <p>21 showed me this alone without this being the</p> <p>22 context, but I believe it's the Amber Heard</p>
L, R, H F/A, Improp. Opinion	<p>126</p> <p>1 Q Okay. And you didn't write the one down</p> <p>2 here on the footage. Can you see -- what is the</p> <p>3 quality of footage? Can you even see if someone</p> <p>4 had a bruise or a cut or swelling or red marks on</p> <p>5 their face in footage from the videos?</p> <p>6 A No.</p> <p>7 MS. VASQUEZ: Objection; compound.</p> <p>8 Mr. Harrell, sorry. Objection; compound; assumes</p> <p>9 facts not in evidence; calls for an expert</p> <p>10 opinion.</p> <p>11 A Not that I'm aware of.</p> <p>12 MS. BREDEHOFT: Okay. All right. Now, we</p> <p>13 can take down Harrell Exhibit 3. But I'm going to</p> <p>14 move for the admission of Harrell Exhibit 3.</p> <p>15 Now, I'm going to ask you, Mr. Harrell, to</p> <p>16 take a look at --</p> <p>17 And, Alex, I'm going to ask you if you can</p> <p>18 bring up Harrell Exhibit 17.</p> <p>19 I'm going to pull up the video clip from</p> <p>20 the interaction you had with Ms. Heard on</p> <p>21 May 22nd, 2016.</p> <p>22 Alex, I'm going to let you go ahead and</p>	<p>128</p> <p>1 interaction.</p> <p>2 Q And you look at the time, it's 13:01. And</p> <p>3 you look like you're looking something up. Are</p> <p>4 you on your computer and she's on her phone? Is</p> <p>5 that fair -- a fair characterization?</p> <p>6 A Yes.</p> <p>7 Q Okay. And do you recognize this other</p> <p>8 person that's shown up here?</p> <p>9 A I don't.</p> <p>10 Q All right. Now you're getting -- is that</p> <p>11 you? Do you recognize yourself now?</p> <p>12 A Yeah, that's me.</p> <p>13 Q All right. Now you're getting up and</p> <p>14 going out. And I'm just going to pause it for a</p> <p>15 moment. Do you see the time, it's 13:01:45 there,</p> <p>16 do you see that down below?</p> <p>17 A Yes.</p> <p>18 Q And now it's 50 as you're leaving there.</p> <p>19 Do you see a dog with Ms. Heard?</p> <p>20 A No.</p> <p>21 Q 13:01:50 when you turned around the</p> <p>22 corner. And now it's -- you're coming back and</p>

Improper
Opinion, L,
R, H, F/A

Transcript of Cornelius Harrell
Conducted on January 13, 2021

33 (129 to 132)

L, R, H,
F/A,
Improper
Opinion

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1 it's 13:02:40. So would you agree the total
2 amount of time was 50 seconds from when you left,
3 went all the way over to the mail room with
4 Ms. Heard, and have returned, would you agree?
5 **A Yes.**
6 Q Okay. So -- and from the start of
7 Ms. Heard coming in, which was 13:01:10, would you
8 agree that this was not eight minutes total, but
9 was, in fact, less than three minutes total, the
10 whole interaction?
11 MS. VASQUEZ: Objection; assumes facts not
12 in evidence.
13 MS. BREDEHOFT: Well, the evidence is
14 right there on this little clock.
15 MS. VASQUEZ: My objection stands, Elaine.
16 Q Would you agree with me on the
17 characterization of this, Mr. Harrell?
18 **A Yes.**

L, R, H,
F/A

19 Q Okay. And we were talking earlier about
20 the process here. And is this when you were going
21 into -- are you looking up things -- what are you
22 doing there on the other side when you're opening
130
1 that up?
2 **A Grabbing a key to a -- an extra key, like**
3 **a spare key.**
4 Q Okay. Is this a resident? Do you
5 recognize her? Or is this a visitor?
6 **A Potentially a vendor. I don't recognize**
7 **her. But a vendor, because she's getting a spare**
8 **key, I can assume that she's a vendor. She works**
9 **at one of the lofts. That's where we have all of**
10 **the spare keys inside of that.**

L, R, H,
F/A,
Improper
Opinion

11 Q Okay.
12 **A This is the process where I told you we**
13 **have to fob them up.**
14 Q Would you agree the quality of this video
15 would make it very difficult to be able to
16 identify any type of marks on anybody?
17 MS. VASQUEZ: Objection; calls for
18 speculation. The document speaks for itself.
19 Calls for expert opinions.
20 Q Do you believe you would be able to
21 ascertain from video, this quality of video,
22 whether someone has any marks or bruises or cuts

L, R, H, F/A,
Improper
Opinion

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1 or is wearing makeup or not wearing makeup unless
2 it's excessive?
3 **A Not from --**
4 MS. VASQUEZ: Objection; compound.
5 Q Go ahead.
6 **A Not from this video.**
7 Q Thank you. Almost. I think I can --
8 there's some people there.
9 MS. BREDEHOFT: Okay. Alex, you can go
10 ahead and take that down. I'm going to move the
11 admission of Harrell Exhibit 17. Now, I'm also
12 going to ask you, Alex -- I'm pretty close to the
13 end, I promise here. I'm going to ask you to pull
14 up, if you can, Harrell Exhibit 4.
15 **A Was that it for the video?**
16 Q Yes.
17 MS. BREDEHOFT: Alex, I'm going to go
18 ahead and let you run this one.

19 Q Do you recognize this person here,
20 Mr. Harrell? You might in a minute. You can
21 answer it in a minute after it gets going.
22 MS. BREDEHOFT: Alex, go ahead and play

L, R, H, F/A,
Improper
Opinion

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1 it. You can go ahead and play it if you'd like.
2 I think -- Alex, we've got some sound issues here.
3 Could we take that back, start that over again,
4 and see if we can get that corrected a little bit?
5 PLANET DEPOS TECHNICIAN: This is Alex,
6 the tech, speaking. Let me get the audio up. One
7 moment. My apologies. I'm hoping that the audio
8 quality comes through well. Please let me know if
9 the audio quality is not coming through and I can
10 come up with an alternative. I'm going to start
11 the video now.
12 (From video)
13 Motherfucker. Motherfucker.
14 What happened?
15 Q Ms. Harrell, do you recognize that as
16 Amber Heard and Johnny Depp?
17 **A Yes.**
18 Q There we go.
19 (From video)
20 Motherfucker. Motherfucker.
21 What happened? What happened?
22 MS. BREDEHOFT: I think the --

L, R, H,
F/A,
Improp.
Opinion

133
1 (From video)
2 Nothing happened this morning, you know
3 that?
4 (Indiscernible) you?
5 No.
6 So then nothing happened to you this
7 morning.
8 Yeah, you're right. I just woke up and
9 you were so sweet and nice. We're not even
10 fighting this morning. All I did was say sorry.
11 Did something happen to you? I don't
12 think so.
13 No, that's --
14 You want to see crazy, I'll give you
15 fucking crazy. Here's crazy. Oh, you're crazy.
16 You're crazy.
17 Have you drunk this whole thing this
18 morning?
19 (Indiscernible)
20 I just started it.
21 Really?
22 Yes.

L, R, H,
F/A,
Improp.
Opinion,
Legal
Concl.

134
1 Q Mr. Harrell, have you ever been shown that
2 video?
3 (From video).
4 You're smashing shit.
5 Q Mr. Harrell, have you ever been shown this
6 video before?
7 A I have not.
8 Q Were you aware, Mr. Harrell, that the
9 judge in the United Kingdom action, in which you
10 signed and had that statement, found that in fact
11 Mr. Depp had engaged in at least 12 domestic
12 violence assaults on Amber Heard?
13 MS. VASQUEZ: Objection; assumes facts not
14 in evidence; calls for a legal conclusion.
15 A I wasn't aware of that at all.
16 Q Were you aware that the judge issued a
17 129-page opinion, 585 paragraphs going through the
18 detail of all the evidence in making those
19 findings?
20 MS. VASQUEZ: Same objections.
21 A I was not.
22 Q No? I am just going to ask you a couple

135
1 more questions. Is it fair to say, Mr. Harrell,
2 that you cannot testify one way or another whether
3 Amber Heard was abused by Johnny Depp on
4 May 21st, 2016?
5 MS. VASQUEZ: Objection; assumes facts not
6 in evidence; calls for a legal conclusion; it's
7 argumentative.
8 Q Do you remember the question?
9 A I do not.
10 Q Would it be fair to say that you cannot
11 testify one way or the other whether Johnny Depp
12 committed domestic violence on Amber Heard on
13 May 21st, 2016?
14 MS. VASQUEZ: Same objections.
15 A Correct.
16 Q And would it be fair to say that you
17 cannot testify one way or the other whether Johnny
18 Depp committed domestic violence on Amber Heard on
19 any other occasion?
20 MS. VASQUEZ: Same objections.
21 A Correct.
22 Q And would it be fair to say that you

L, R, P,
SP, F/A,
Lack of
Pers.
Know.,
Improper
Opinion,
Needlessly
Cumulative

136
1 cannot say whether Amber Heard had injuries or did
2 not have injuries on May 22nd, 2016?
3 MS. VASQUEZ: Objection; argumentative;
4 assumes facts not in evidence; and compound.
5 A Is there -- is there another video?
6 Because I believe I've seen her again that day.
7 That specific day she came down a couple of times,
8 and that wasn't what I remember, the interaction I
9 remember. That one was probably the wine, but she
10 also came down for dry cleaning in which she made
11 me call the person to pick it up because she
12 needed it the day of. And it was like a Louis
13 Vuitton jacket and it was very specific. But that
14 interaction was a little longer than the one that
15 you just shown. I don't remember that one that
16 you just shown until I realized I remember the
17 shoes that she had on. But the one that I recall
18 from this statement wasn't the interaction that
19 you just showed. Do you have footage of the
20 actual thing that I grabbed out of the package
21 room? Because the package room footage would show
22 me if it was dry cleaning or it was the wine

<p>137</p> <p>1 situation, because I think there was two on that</p> <p>2 same day.</p> <p>3 Q So, Mr. Harrell, I'm not able to answer</p> <p>4 your questions in the deposition. The purpose of</p> <p>5 the deposition is for me to ask --</p> <p>6 A To answer questions.</p> <p>7 Q -- you questions, and I'm not allowed to</p> <p>8 testify. But what I showed you was the clip that</p> <p>9 had been selected by, in fact, I believe it was</p> <p>10 Mr. Depp's attorneys. And so that's what I have</p> <p>11 there. Are you aware whether there was any</p> <p>12 preservation of any other footage other than the</p> <p>13 video clips?</p> <p>14 A No. This is like, the first time I'm</p> <p>15 seeing lengthy clips.</p> <p>16 MS. VASQUEZ: Objection; vague; ambiguous.</p> <p>17 Q So you asked about the -- you asked about</p> <p>18 the incidents, and so I'm going to ask you to take</p> <p>19 a look and --</p> <p>20 MS. BREDEHOFT: And Alex, if you can -- if</p> <p>21 you can pull up Harrell Exhibit 1. And I'm going</p> <p>22 to ask you to go to --</p>	<p>139</p> <p>1 to the witness statement number three, Harrell 3?</p> <p>2 And I'm going to take control of this for a quick</p> <p>3 minute.</p> <p>4 Q And I'm going to go down, because you said</p> <p>5 you had this other memory there, do you recall</p> <p>6 that? I'm going to ask you to go down. And you</p> <p>7 have Sunday, 22, 2016, and that's when you say</p> <p>8 approximately 1:00 p.m., right, that she showed</p> <p>9 up, right, that's -- that was what was shown up on</p> <p>10 the video clip, 1:00 p.m.; correct? Am I correct</p> <p>11 that you saw the video --</p> <p>12 A Yes.</p> <p>13 Q -- showing 1:00 on May 22nd? And it said</p> <p>14 Ms. Heard approached me at the front desk with her</p> <p>15 dog. But there was not a dog with her; correct?</p> <p>16 A From that footage no.</p> <p>17 Q And so she told me that she needed to pick</p> <p>18 up a delivery of wine. I took Ms. Heard to the</p> <p>19 mail room, commented on her dog before sorting</p> <p>20 through the packages to identify her delivery.</p> <p>21 Ms. Heard and I spoke for approximately eight</p> <p>22 minutes in total.</p>
<p>138</p> <p>1 Q Before we go there, so Mr. Harrell, do you</p> <p>2 have a recollection of giving your deposition on</p> <p>3 July 28, 2016?</p> <p>4 A I do remember something happening around</p> <p>5 that time regarding this situation.</p> <p>6 Q And you were under oath at the time you</p> <p>7 gave this deposition; correct?</p> <p>8 A Correct.</p> <p>9 Q Okay. And, in fact, you were under oath</p> <p>10 when you signed the witness statement for the UK</p> <p>11 proceedings that was Harrell Deposition Exhibit 3,</p> <p>12 do you recall that?</p> <p>13 A When I signed this document or I signed --</p> <p>14 Q No, you signed the witness statement that</p> <p>15 we went through.</p> <p>16 A Oh, the thing that was emailed to me?</p> <p>17 Q Yes. Did you have an understanding you</p> <p>18 were under oath when you signed that?</p> <p>19 A Yes.</p> <p>20 Q Okay.</p> <p>21 MS. BREDEHOFT: In fact, you know what,</p> <p>22 Alex, before we go to this one, can we jump back</p>	<p>140</p> <p>1 Would you agree the footage showed 50</p> <p>2 seconds from the time you both left the concierge</p> <p>3 desk until the time you returned?</p> <p>4 A Correct.</p> <p>5 Q Okay. And it said, could not have been</p> <p>6 more than one foot apart due to the confines of</p> <p>7 the mail room, and then we've gone through the</p> <p>8 rest of it. Then there's nothing else from May</p> <p>9 2016 and the next -- you detail two more times</p> <p>10 that you saw her and those were in July. I'm</p> <p>11 going to let you read those. Take a minute and</p> <p>12 read them.</p> <p>13 Now, you don't mention in here any</p> <p>14 occasion later that day or later that week and</p> <p>15 Louis Vuitton or dry cleaning or anything, do you?</p> <p>16 A Is there more to this?</p> <p>17 Q Your signature is next. So looking at</p> <p>18 this, do you have a recollection of seeing</p> <p>19 Ms. Heard again on the 22nd other than this and</p> <p>20 then what you testified to about the -- later</p> <p>21 seeing her in the elevator?</p> <p>22 A I think I -- I think I did see her again.</p>

L, R, H,
F/A,
Improp.
Opinion

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1 Because when you had -- this whole statement
2 doesn't -- it's not the same interaction as what
3 we've seen on camera. So it must have been a
4 different time window or different period, because
5 I remember, like, she had a white thing on and
6 there she had a jacket on and she had a dog, and
7 there she didn't have a dog. But I do remember
8 seeing her three times in one day, which was very
9 odd. And I think one of those incidents is mixed
10 up in between this statement from what you have.
11 So to answer your question, I don't think
12 I would be able to test -- my testimony would work
13 of any kind of violence given everything that was
14 presented today.

15 Q I'm sorry, I didn't understand your --
16 your answer there.

L, R, P,
SP, F/A,
Lack of
Pers.
Know.,
Needlessly
Cumulative

17 A The last question you asked me was based
18 upon everything that we kind of gathered today
19 would you be able to test -- present a testimony
20 of any violence. And I -- if that is the case,
21 with all of this evidence, I would not be able to,
22 my statement wouldn't.

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1 Q Your statement would be that you could not
2 testify that --

3 A Based upon everything that was presented
4 today.

5 Q That you could not testify whether Amber
6 Heard had injuries or did not have injuries as a
7 result of an incident on May 21, 2016?

8 A Based upon everything --
9 MS. VASQUEZ: Objection.

10 A -- today, yes. But I do remember seeing
11 her again. And it has to be that day if you guys
12 are gathering that day, because it was a
13 completely different outfit, but -- and the
14 remembrance is different than what you've guys
15 seen in that video because it's not that
16 interaction that I remember.

17 Q And I just want to make sure that I'm
18 clear, based on everything that you have seen and
19 you have written in this statement, etcetera, are
20 you able to testify that Amber Heard did not
21 suffer domestic violence from Johnny Depp on
22 May 21, 2016?

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1 MS. VASQUEZ: Objection; vague; ambiguous;
2 assumes facts not in evidence; it's argumentative.

3 Q I'll rephrase it and make it very simple.
4 Mr. Harrell, as you sit here today are you
5 able to testify to whether Amber Heard was
6 domestically abused by Johnny Depp on
7 May 21st, 2016?

8 MS. VASQUEZ: Same objections; and asked
9 and answered.

10 MS. BREDEHOFT: Let me ask it again
11 because I messed it up. Sorry about that.

12 Q Mr. Harrell, are you able to testify
13 whether -- whether or not, either way, whether
14 Johnny Depp committed violence, domestic violence
15 on Amber Heard on May 21st, 2016?

16 A I am not. Lack of Pers Know

17 Q Okay. I have no further questions. I am
18 going to now let Ms. Vasquez ask you questions.

19 MS. BREDEHOFT: All right. Mr. Harrell --
20 Alex, do you mind taking off -- thank you.

21 MS. VASQUEZ: Mr. Harrell and Elaine and
22 Mr. Court Reporter, do you mind if we take a

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1 five-minute bathroom break? Is that all right
2 with everyone, and come back on the record at
3 4:55 p.m.?

4 THE VIDEOGRAPHER: Okay. It is 7:50 p.m.
5 We go off the record.

6 (Off the record from 7:50 p.m. to 7:59
7 p.m.)

8 THE VIDEOGRAPHER: It is 7:59 p.m., we are
9 back on the record.

10 EXAMINATION BY COUNSEL FOR THE PLAINTIFF
11 BY MS. VASQUEZ:

12 Q Hello, Mr. Harrell. Good afternoon. My
13 name is Camille Vasquez and I represent Mr. Depp
14 in this litigation. If you'll recall,
15 Ms. Bredehoft asked you if you had signed a
16 witness statement for the UK proceeding in which
17 Mr. Depp sued The Sun, which is a publication in
18 the United Kingdom. Do you recall testifying live
19 by video link in that proceeding?

20 A Video link, no.

21 Q Do you recall testifying at all in any
22 fashion in the UK proceeding in which Mr. Depp

L, R, P,
SP, F/A,

Needless
Cumulat.

<p>145</p> <p>1 initiated a lawsuit against The Sun earlier this 2 year or 2020, last year?</p> <p>3 A I think it was the one where they – they 4 send me an email to sign in writing.</p> <p>5 Q Right. So just to confirm, Mr. Harrell, 6 other than the witness statement in which you 7 signed, you did not testify orally in that 8 proceeding; correct?</p> <p>9 A Yes.</p> <p>10 Q Yes, I'm correct, you did not testify?</p> <p>11 A Correct.</p> <p>12 Q I want to talk about May 22nd, 2016, with 13 you, Mr. Harrell, because I think some of the 14 testimony has been a bit confusing to me. So 15 let's try to clear it up. Do you recall how many 16 times on May 22nd, 2016, you actually interacted 17 with Ms. Heard?</p> <p>18 A Now that I think about it, it may have 19 been either one to three times. Yeah, that's what 20 I recall. Because I don't remember that 21 interaction that you just – I just seen on video, 22 so I do remember a different one.</p>	<p>147</p> <p>1 wine but she had various packages, so we went from 2 the front desk to the package room, and I believe 3 she had a dog and she had it with her and then she 4 let it down. And then I remember looking at her 5 outfit because it was really nice, I remember 6 paying her a compliment. And then I remember kind 7 of going to the package room and kind of -- she 8 had a bunch of things and she didn't want to take 9 everything, she wanted one specific thing.</p> <p>10 Q I think you described for Ms. Bredehoft 11 how large the package room is. Would you agree 12 that it's -- I think you described it as a closet; 13 would you agree it's quite small?</p> <p>14 MS. BREDEHOFT: Objection to the form of 15 the question.</p> <p>16 A Yes. Small.</p> <p>17 Q How many people, approximately, could fit 18 inside the package room at one time?</p> <p>19 A Maybe like six or seven.</p> <p>20 Q The interaction that you recall with 21 Ms. Heard when she came into the package room with 22 you, how close were you standing with her?</p>
<p>146</p> <p>1 Q Okay. Let's talk about the one that you 2 remember from May 22, 2016, are you certain that 3 your interaction with Ms. Heard that you recall 4 was on May 22nd, 2016?</p> <p>5 A I don't.</p> <p>6 Q Okay. Let's -- do you remember or do you 7 recall roughly when your interaction that you do 8 recall with Ms. Heard took place, approximately?</p> <p>9 A I believe it was on a Sunday, because I 10 worked there on a Sunday. So if it was a Sunday, 11 then that's probably the only time it could've 12 taken place.</p> <p>13 Q Okay. Do you agree with me that it took 14 place sometime in May of 2016 on a Sunday, to the 15 best of your recollection?</p> <p>16 MS. BREDEHOFT: Objection to the form of 17 the question.</p> <p>18 A Correct, on a Sunday.</p> <p>19 Q Okay. What do you recall about the time 20 you interacted with Ms. Heard on a Sunday in May 21 of 2016?</p> <p>22 A I recall that she needed -- she wanted</p>	<p>148</p> <p>1 A Pretty close. It was various, it wasn't 2 like -- it was very natural, so it wasn't like 3 very close, this close, but it was like she kept 4 going back and forth and she had her dog and so 5 she was kind of catering to her dog and then I 6 remember showing her a couple of packages, 7 pointing and she didn't want to take those, she 8 had something specific, and I remember showing her 9 each one that I recall.</p> <p>10 Q Okay. Mr. Harrell, I believe you've 11 testified prior that you've been deposed a number 12 of times, at least twice, do you recall that 13 testimony earlier today?</p> <p>14 A Yes.</p> <p>15 Q Okay. I'm going to show you what we're 16 going to mark, the next exhibit in order, I don't 17 recall what the exhibit number that is, but the 18 next exhibit in order. I'm going to show you your 19 previous deposition transcript from the Bloom 20 matter. And you were deposed -- I will represent 21 to you that you were deposed on 22 January 31st, 2019.</p>

Transcript of Cornelius Harrell
Conducted on January 13, 2021

38 (149 to 152)

<p>149</p> <p>1 MS. VASQUEZ: Alex, do you mind pulling 2 up, I think it's Exhibit 9 from plaintiff's 3 exhibits. 4 MS. BREDEHOFT: While you're doing that 5 I'm going to state on objection for the record. 6 I'm going to object to any questions on this 7 deposition that's not been provided to us, 8 although we requested in discovery. So we are 9 significantly prejudiced by the fact that we had 10 no ability to be able to review this or review any 11 of the testimony on it. So I'm going to object to 12 any questions on this. 13 MS. VASQUEZ: I'll just respond to you, 14 Elaine. I believe this deposition has been 15 provided to you. I will confirm by the end of 16 this deposition or later today whether or not it 17 has, in fact, been produced in discovery. 18 Q Mr. Harrell, I'm going to ask you to 19 please -- 20 MS. VASQUEZ: Alex -- actually, are you 21 giving me control over this or not? 22 PLANET DEPOS TECHNICIAN: This is Alex,</p>	<p>151</p> <p>1 produced in discovery, but I will confirm that by 2 the end of today. 3 MS. BREDEHOFT: More specifically, 4 Ms. Vasquez, I'm asking if you will agree that I 5 may have a blanket objection, so in other words I 6 preserve my objection through all of your 7 questions on this document on the basis that it 8 has not been provided in discovery to us. 9 MS. VASQUEZ: Understood. Yes, I agree -- 10 MS. BREDEHOFT: I need to say yes you 11 agree otherwise I have to object every time. 12 MS. VASQUEZ: You interrupted, but I said 13 yes, I agree. 14 MS. BREDEHOFT: Okay. Thank you. 15 MS. VASQUEZ: You're welcome. 16 Q All right. So I'm going to show you -- so 17 do you -- Mr. Harrell, do you recall being deposed 18 in January 31st of 2019? 19 A Yes. 20 Q And I will represent to you, Mr. Harrell, 21 that this is the deposition transcript that was 22 generated after your deposition. Do you ever</p>
<p>150</p> <p>1 the tech, speaking. I'm happy to do that if you 2 would like. 3 MS. VASQUEZ: Sure. That would be great. 4 Thank you. 5 PLANET DEPOS TECHNICIAN: Sure. 6 MS. VASQUEZ: Please everyone bear with 7 me. It's going to be my first time. 8 MS. BREDEHOFT: And Ms. Vasquez, while 9 you're doing this, I just want to make sure, I 10 don't want to continue to interrupt your flow, but 11 I'm going to have now a blanket objection to any 12 questions on this because we have never seen this, 13 it has never been produced to us nor has the 14 videotaped deposition been provided to us. I 15 don't want to -- I don't want to object to every 16 single question I ask. Will you agree that we 17 have a blanket objection to anything being asked 18 on this because it was not produced on discovery? 19 MS. VASQUEZ: I agree that a blanket 20 objection is better than interrupting every 21 question. I think it'll make it go faster for 22 everyone. I disagree that this has not been</p>	<p>152</p> <p>1 recall receiving this deposition transcript after 2 your deposition? 3 A I don't recall. 4 Q Do you recall ever reviewing this 5 deposition transcript after your deposition? 6 A No. 7 Q I'm going to take you to page 11 of your 8 deposition transcript. Actually page 13. 9 Starting on line 6. Mr. Harrell, I'm going to ask 10 that you read lines 6 through 11 where you were 11 asked the question, let's focus in on the 12 interaction that you previously described having 13 with Ms. Heard on May 22nd, 2016. You previously 14 testified about providing a package to Ms. Heard 15 on that day. Can you tell us about your 16 interaction with Ms. Heard on May 22nd, 2000 -- or 17 on May 22nd, full stop? 18 MS. BREDEHOFT: I'm sorry, before you go 19 in, I'm going to -- I have additional objections. 20 I'm going to object that this is an improper 21 question, an improper manner to ask these 22 questions, and you can't ask a witness to just go</p>

<p>153</p> <p>1 in and read something. So I'm going to object to 2 it on that basis as well, and hearsay. 3 Q Did I mess this up? Mr. Harrell, I'm 4 going to ask you read from line 12 on page 13 of 5 your deposition testimony through lines 25. Let 6 me know if -- 7 MS. BREDEHOFT: Same objection. 8 A Sorry, line what to what line? 9 Q 12 to 25 on page 13. 10 A Am I reading it out loud or just to 11 myself? 12 Q You can read it to yourself. 13 A Okay. 14 Q I'm going to ask you a question. 15 Mr. Harrell, do you recall testifying that you 16 interacted with Ms. Heard on May 22nd, 2016, and 17 that you took her back to the package room to 18 retrieve a package? 19 MS. BREDEHOFT: I'm going to object to the 20 form of the question. It's an improper way to ask 21 the questions, as well as leading and hearsay. 22 MS. VASQUEZ: I'm allowed to lead this</p>	<p>155</p> <p>1 A Yes. 2 Q What do you recall about your interaction 3 with Ms. Heard on May 22nd, 2016, about her 4 appearance? 5 A I remember her wearing kind of like a sun 6 outfit, a sundress of some sort. And I remember a 7 dog. And yeah, she was very pleasant. That's 8 kind of all I remember. 9 Q Was she wearing a jacket on top of the 10 sundress? 11 A I don't think so. That's why I was a 12 little bit caught off guard from the footage that 13 you guys seen. I've never seen that footage, but 14 that doesn't match the interaction that I remember 15 that day. It could have very well been an 16 interaction that we had that day. 17 Q When you interacted with Ms. Heard on 18 May 22nd, 2016, do you recall her having any marks 19 or cuts or bruising or swelling on her face? 20 MS. BREDEHOFT: Objection; leading. And 21 asked and answered. 22 A That day, no.</p>
<p>154</p> <p>1 witness. It's not my witness. 2 MS. BREDEHOFT: Actually, you did a 3 counter -- you actually did a counter notice of 4 deposition, so it is your witness. 5 Q Mr. Harrell, do you remember the question? 6 A I do not. 7 MS. VASQUEZ: Okay. Mr. Court Reporter, 8 do you mind reading back the question. 9 (Requested portion read back.) 10 A Yes, I do. 11 Q Mr. Harrell, I'm going to ask you to read 12 on the next page, page 14, beginning on lines 13 eight through line 23. 14 A Yes. 15 Q Do you recall describing Ms. Heard as 16 quote, a beautiful girl, the day that you met her 17 -- that you interacted with her on May 22nd, 2016? 18 MS. BREDEHOFT: Objection to the form of 19 the question. It's an improper use of the 20 deposition and the attempts to refresh 21 recollection. It's also leading and calls for 22 hearsay.</p>	<p>156</p> <p>1 Q When you say that day, are you referring 2 to May 22nd, 2016? 3 A Correct. Yes. 4 Q Had Ms. Heard had swelling or redness or a 5 bruise or a cut on her face, do you think you 6 would've noticed? 7 MS. BREDEHOFT: Objection to the form of 8 the question. Calls for speculation; 9 hypothetical; and expert witness opinion as well 10 as leading. 11 A I believe I would have noticed. I'm very 12 observant. 13 Q Do you recall if Ms. Heard was wearing 14 makeup on May 22nd, 2016, when you actually 15 interacted with her? 16 MS. BREDEHOFT: Objection. 17 A She was wearing makeup. Very little, like 18 glittery makeup. 19 Q When you say glittery, what do you mean by 20 that? 21 A Iridescent, like sparkly, maybe some type 22 of powder or some type of light blush, silvery</p>

<p>157</p> <p>1 type of like natural-toned makeup.</p> <p>2 Q Would you agree with me that it was light</p> <p>3 makeup, if any makeup at all?</p> <p>4 MS. BREDEHOFT: Objection to the form of</p> <p>5 the question.</p> <p>6 A Yes.</p> <p>7 Q At any time that you interacted with</p> <p>8 Ms. Heard did you ever see any bruising, swelling,</p> <p>9 red marks on her face?</p> <p>10 A I didn't.</p> <p>11 Q How about on her body? At any time that</p> <p>12 you interacted with Ms. Heard while she was a</p> <p>13 resident at Eastern Columbia, did you ever see any</p> <p>14 marks, cuts, bruises, swelling on any part of her</p> <p>15 body?</p> <p>16 A I did not.</p> <p>17 Q Had you seen any marks, cuts, bruising,</p> <p>18 swelling, do you think you'd recall?</p> <p>19 MS. BREDEHOFT: Objection to form of the</p> <p>20 question; calls for speculation; hypothetical; and</p> <p>21 an improper form.</p> <p>22 A I believe I would.</p>	<p>159</p> <p>1 A I -- I would remember if she had marks on</p> <p>2 her face, but I wouldn't recall if -- because it</p> <p>3 wasn't -- because she did have makeup on, so I</p> <p>4 wouldn't recall if it was covered or not.</p> <p>5 Q Isn't it true, Mr. Harrell, that you said</p> <p>6 Ms. Heard appeared to have very light makeup on --</p> <p>7 A Yes.</p> <p>8 Q -- some powder and concealer?</p> <p>9 A Yes.</p> <p>10 Q I'm going to show you another photograph.</p> <p>11 MS. VASQUEZ: Alex, do you mind pulling</p> <p>12 up, please, Plaintiff's No. 13. Thank you, Alex.</p> <p>13 Q Mr. Harrell, do you recognize the person</p> <p>14 depicted in this photograph?</p> <p>15 A Yes, Amber Heard.</p> <p>16 Q Okay. I'm going to represent to you,</p> <p>17 Mr. Harrell, that this is a photograph Ms. Heard</p> <p>18 has actually produced in discovery. And according</p> <p>19 to the metadata that's attached to this</p> <p>20 photograph, it appears that it was taken on</p> <p>21 May 22nd, 2016.</p> <p>22 Had Ms. Heard had the red mark and what</p>
<p>158</p> <p>1 Q Earlier in this deposition, Ms. Bredehopt</p> <p>2 showed you some photographs of Ms. Heard that you</p> <p>3 identified as photographs of Ms. Heard and you saw</p> <p>4 -- I presume you saw a number of what appeared to</p> <p>5 be injuries documented in those photographs. Had</p> <p>6 Ms. Heard looked like she did in any of the</p> <p>7 photographs when you interacted with her in 2016,</p> <p>8 would you remember that?</p> <p>9 MS. BREDEHOFT: Objection to the form of</p> <p>10 the question; calls for a hypothetical;</p> <p>11 speculation; improper form.</p> <p>12 A I lost you a little bit of that</p> <p>13 conversation. You kind of froze. Would you be</p> <p>14 able to --</p> <p>15 MS. VASQUEZ: Mr. Court Reporter, I</p> <p>16 apologize, Paul, would you mind rereading that</p> <p>17 question.</p> <p>18 MS. BREDEHOFT: Same objections.</p> <p>19 A I'd say no.</p> <p>20 Q No, you wouldn't remember if she had any</p> <p>21 bruising or marks on her face or you would</p> <p>22 remember?</p>	<p>160</p> <p>1 appears to be bruising above her eye on</p> <p>2 May 22nd, 2016, when you interacted with her,</p> <p>3 would you suspect that you would have seen that?</p> <p>4 MS. BREDEHOFT: Objection to the form of</p> <p>5 the question; calls for speculation; hypothetical;</p> <p>6 and improper form of the question for the first SP, Lack of</p> <p>7 part, making representations. Pers. Know,</p> <p>8 A I do not. Improper</p> <p>9 Q Sorry, I'm a little unclear. You would Opinion</p> <p>10 not have seen that or you would have seen that?</p> <p>11 A I think that isn't -- I think that could</p> <p>12 have been covered with very light makeup because</p> <p>13 it just looks like redness, so I could very well</p> <p>14 have missed that. Because it's not very dark,</p> <p>15 it's very light. That's easily -- in my opinion I</p> <p>16 think that could easily be covered with powder or</p> <p>17 a little bit of concealer. It's not as dark as</p> <p>18 like undereye, so I could have very well missed</p> <p>19 that. It looks like acne.</p> <p>20 Q Had Ms. Heard had swelling on her face on</p> <p>21 May 22nd, 2016, do you think you would've noticed</p> <p>22 that?</p>

<p>161</p> <p>1 MS. BREDEHOFT: Objection to form of the 2 question -- 3 A Absolutely. 4 MS. BREDEHOFT: -- calls for speculation; 5 hypothetical. 6 Q Do you recall seeing any swelling on 7 Ms. Heard's face on May 22nd, 2016? 8 A I do not. 9 Q Would you agree with me that if a cell 10 phone had been thrown at Ms. Heard's face, she 11 would've had swelling? 12 MS. BREDEHOFT: Objection to the form of 13 the question; calls for expertise and 14 hypothetical. Improper question for this witness. 15 A I think so. 16 MS. VASQUEZ: Alex, may I have you please 17 pull up Plaintiff's Exhibit 14. 18 Q Mr. Harrell, do you recognize the person 19 depicted in this photograph? 20 A Yes, Amber Heard. 21 Q When you interacted with Ms. Heard, did 22 you ever see her have an injury on her face as the</p>	<p>163</p> <p>1 you can remove that picture. 2 Q Mr. Harrell, have you ever received 3 payment in exchange for your testimony in any 4 proceeding? 5 A Yes. 6 Q From whom? 7 A I think it was the first deposition we 8 got, it was attached to the back, it was like a 9 check that attached to the back. 10 Q When you say attached to the back, you 11 mean it was attached to the back of the subpoena? 12 A Correct. 13 Q Was that your mileage fees? Do you recall 14 if that was the mileage fees? 15 A Yes, that was exactly what that was for. 16 Q Besides mileage fees attached to any 17 subpoena in California, have you ever been paid by 18 anyone to testify? 19 A No. 20 Q Has anyone ever offered to pay you to 21 testify in any matter? 22 A No.</p>
<p>162</p> <p>1 one depicted in this photograph? 2 A No. 3 Q Sitting here today, had she had an injury 4 on her face as the one depicted in this 5 photograph, would you remember that? 6 MS. BREDEHOFT: Objection to form of the 7 question; calls for speculation; hypothetical. 8 A Yes. 9 Q How would you describe the lighting in the 10 lobby of the Eastern Columbia Building? 11 A Spotted. So it's dark, but spotlights 12 throughout. But it's easy to see, it's not very 13 bright, but it's very spotlighted. If you're 14 standing in the front desk, there's spotlights 15 right on your head. In the hall leading to the 16 package room it's bright lights, so it's like 17 fluorescent lights all the way through, so it 18 changes from the front desk to the package room 19 hall, and then the actual package room is 20 completely different lighting, so it's three 21 different types of lighting in that little area. 22 MS. VASQUEZ: Okay. Thanks, Alex, I think</p>	<p>164</p> <p>1 Q Has anyone at all offered you any other 2 benefit in return for your testimony? 3 A Throughout like legally or? 4 Q In relation to this -- these incidents? 5 A There have been people who have reached 6 out to me like journalists, like all types of like 7 I guess publicists, but not like legally, just on 8 like social platforms that are going to the 9 building, things of that nature, but not formally 10 or legally or any of the lawyers that I know of. 11 It's just been random people's attempts to kind of 12 message me indirectly off the record. A lot of 13 people have said off the record this or trying to 14 get statements about the situation or more 15 evidence about the situation but all those weren't 16 any of the court-provided sources that I know of. 17 Q Has anyone represented to you that they 18 represent Mr. Depp in relation to any benefits in 19 exchange for your testimony? 20 A No. 21 Q Has anyone represented that they represent 22 Ms. Heard in exchange for your testimony? I'm</p>

SP

<p>165</p> <p>1 sorry, I didn't catch that. Was that a no?</p> <p>2 A No.</p> <p>3 Q Going back to the witness statement that</p> <p>4 was submitted in the UK proceeding, Mr. Harrell.</p> <p>5 You said that you received it by email; is that</p> <p>6 right?</p> <p>7 A Yes.</p> <p>8 Q I believe your testimony, feel free to</p> <p>9 correct me, I believe your testimony was that you</p> <p>10 reviewed it, changed some things that you didn't</p> <p>11 agree with, and then returned it; is that your</p> <p>12 testimony? Is that an accurate description of</p> <p>13 your testimony?</p> <p>14 A Emailed it back, yes.</p> <p>15 Q Did you make some changes to your witness</p> <p>16 statement?</p> <p>17 A I did.</p> <p>18 Q And did you make those changes in the Word</p> <p>19 document on your computer?</p> <p>20 A I believe I did. And it was something</p> <p>21 regarding -- very minimal, it was like about the</p> <p>22 job title, things like -- that I knew were</p>	<p>167</p> <p>1 half of that.</p> <p>2 Q Okay. So is it your testimony --</p> <p>3 A In fact, when I emailed him back, I</p> <p>4 remember my signature but it was only one page and</p> <p>5 it was just the signature page, it wasn't any of</p> <p>6 the documents according to it. It was just the</p> <p>7 signed last page with just my name and a line. It</p> <p>8 didn't have any statement part.</p> <p>9 Q So is it your testimony, Mr. Harrell, that</p> <p>10 the exhibit that Ms. Bredehoft showed you, the</p> <p>11 witness statement, was that not the witness</p> <p>12 statement that you submitted in the UK proceeding?</p> <p>13 MS. BREDEHOFT: Objection to the form of</p> <p>14 the question.</p> <p>15 A Everything that we went over today as far</p> <p>16 as the statement I did not see all of those</p> <p>17 documents. It wasn't the same exact thing that I</p> <p>18 would've signed because I was -- I'm unaware of</p> <p>19 half those things. So I don't understand why I</p> <p>20 would sign off on a lot of those things. It was</p> <p>21 the first time I've seen a lot of that.</p> <p>22 And what I changed was my job title, I</p>
<p>166</p> <p>1 incorrect.</p> <p>2 Q So is that to say that everything else</p> <p>3 that was in the statement you agreed with and was</p> <p>4 accurate and correct?</p> <p>5 MS. BREDEHOFT: Objection to the form of</p> <p>6 the question.</p> <p>7 A With the statement I just seen today?</p> <p>8 Q The statement that you reviewed and that</p> <p>9 you changed? Did you only change -- let me -- let</p> <p>10 me ask a clean question.</p> <p>11 Did you only change what was incorrect in</p> <p>12 the statement?</p> <p>13 MS. BREDEHOFT: Objection to the form of</p> <p>14 the question.</p> <p>15 A Yes.</p> <p>16 Q So does that mean that everything that was</p> <p>17 correct in the statement you left unchanged?</p> <p>18 MS. BREDEHOFT: Objection to form of the</p> <p>19 question.</p> <p>20 A From the email that I received, yes. But</p> <p>21 from what we reviewed today, it doesn't seem like</p> <p>22 it was the same because I wouldn't have agreed to</p>	<p>168</p> <p>1 think, because they had me -- and I only remember</p> <p>2 it being very small, like a paragraph and a half,</p> <p>3 two paragraphs, and today we presented a whole</p> <p>4 laundry list of A through G and E, and I'm a</p> <p>5 little bit -- I feel a little bit sidetracked</p> <p>6 because I don't remember that being that way. I</p> <p>7 do remember the interaction being over weeks, span</p> <p>8 of weeks, and someone calling me saying, I need</p> <p>9 you to sign this paper, and it wasn't a lot. And</p> <p>10 I ended up signing something from my phone, now</p> <p>11 it's kind of brought it back to memory, and I</p> <p>12 marked up -- I used the Marked Up app. And it was</p> <p>13 only the last page with nothing else included with</p> <p>14 it. But I know they were working on a very tight</p> <p>15 deadline, and I do recall the date changing many</p> <p>16 times about the situation.</p> <p>17 I remember I also got sick. I got very</p> <p>18 sick around that time as well, and I probably</p> <p>19 wasn't as helpful because I was very, very ill.</p> <p>20 In fact, the last time that anyone subpoenaed me I</p> <p>21 wasn't able to make it to any of the trials or any</p> <p>22 of the conversations. I didn't want to do it</p>

<p>169</p> <p>1 because I had COVID and I didn't want to partake 2 in any of it.</p> <p>3 Q Thank you, Mr. Harrell, and I apologize. 4 I'm glad that you're feeling better.</p> <p>5 MS. VASQUEZ: Alex, do you mind bringing 6 up -- I don't know what exhibit number it is, but 7 the witness statement from the UK proceeding.</p> <p>8 PLANET DEPOS TECHNICIAN: This is Alex, 9 the tech speaking, I believe that's Exhibit 3, 10 I'll bring it up.</p> <p>11 MS. VASQUEZ: Okay. Thank you. That is 12 it.</p> <p>13 PLANET DEPOS TECHNICIAN: Great.</p> <p>14 Q Mr. Harrell, I'm sorry to make you go 15 through this again, but when you first received 16 the draft witness statement, do you recall 17 reviewing and agreeing to paragraph 1?</p> <p>18 A Well, with, first I can say, I don't 19 remember it being formatted like this, I just 20 remember it being, like, at bed of an email. And 21 so I'm looking at this and it looks like a legal 22 document that I probably would have been spent a</p>	<p>171</p> <p>1 had two at this moment when it was in writing. 2 MS. VASQUEZ: Okay. Alex, I don't know if 3 -- I don't know I have control. Thank you.</p> <p>4 A And this one was in 2019.</p> <p>5 Q This witness statement, I believe was 6 executed in 2020.</p> <p>7 A Yeah, so I don't think I would've agreed 8 with that because I didn't work there then.</p> <p>9 Q End of 2019?</p> <p>10 A Like, looking at the first couple of 11 sentences it says I was, like, working at a place 12 I didn't work at, living at a place I didn't live 13 at. For a whole year, it's a whole completely 14 different -- like it says I was a brand manager, I 15 wasn't a brand manager in that year at all, and I 16 think I would've corrected that. And then at that 17 time it probably wasn't like three years, more 18 like two or maybe --</p> <p>19 Q Okay.</p> <p>20 A -- going on two. And then so my address 21 is kind of wrong, my job isn't the right one, and 22 then the time of working at the Eastern, I don't</p>
<p>170</p> <p>1 little bit more time if I feel like it was 2 presented like this. But I remember it being 3 certain things because we originally wanted 4 meeting in person and then, like, it didn't happen 5 and they were like, well, we can do a statement, I 6 think it was after months and months of 7 anticipation, and then they ended up having me 8 agree to a draft that already was written.</p> <p>9 Q Okay. Well, do you recall reading 10 paragraph 1, the substance of paragraph 1, in 11 whatever format it was presented to you, and do 12 you remember agreeing with paragraph 1?</p> <p>13 MS. BREDEHOFT: Objection to the form of 14 the question. Go ahead.</p> <p>15 A I don't remember.</p> <p>16 Q Do you agree with the statements in 17 paragraph 1, sitting here today?</p> <p>18 A Some of them. I don't think I worked 19 there three years at that moment. And then my 20 first witness statement in these proceedings. I 21 don't think it was my first time talking to them 22 at this specific time because I think I've already</p>	<p>172</p> <p>1 think it was three years.</p> <p>2 Q All right.</p> <p>3 A At that moment.</p> <p>4 Q Understood. Let's go down to paragraph --</p> <p>5 A I do remember that -- those similar 6 details were adjacent to the one at the beginning, 7 which happened in 2016 when I got the deposition 8 of that. Those are very similar to the wording 9 that I probably would've said before.</p> <p>10 Q Alex [sic], you just testified that the 11 wording in this witness statement is similar to 12 your testimony from 2016, your deposition 13 testimony, is that what you're referring to?</p> <p>14 A From that first sentence -- that first 15 paragraph, I think those details were probably 16 taken from what happened in 2016 because it's more 17 aligned with my life then. But if I would've seen 18 this, I would've fixed that right away.</p> <p>19 Q Looking at paragraph 8, Alex. I'm so 20 sorry, looking at paragraph 8, Mr. Harrell. I'm 21 speaking to Alex because I thought he had control. 22 Do you recall testifying in 2016 at your</p>

<p>173</p> <p>1 deposition that Ms. Heard approached you with her</p> <p>2 dog at the front desk?</p> <p>3 A Yes.</p> <p>4 Q Would you agree with me, Mr. Harrell, that</p> <p>5 your memory was better in 2016 when you were first</p> <p>6 deposed of these incidents?</p> <p>7 A My memory of these incidents probably was</p> <p>8 100 percent better given a month later or two</p> <p>9 months later. But since I've been talking about</p> <p>10 this incident for the last four years, I feel like</p> <p>11 I haven't really skipped a beat. It may not be as</p> <p>12 detailed, but I do remember the specific incidents</p> <p>13 once you guys lay it out for me in like -- it</p> <p>14 wasn't a lot to grab on to, but I would remember</p> <p>15 certain things like details and any of the alleged</p> <p>16 bruises or swelling or anything like that, I feel</p> <p>17 like I would have remembered that today.</p> <p>18 MS. VASQUEZ: Okay. All right. I don't</p> <p>19 think I have any further questions for you,</p> <p>20 Mr. Harrell. I think it's exhausted.</p> <p>21 EXAMINATION BY COUNSEL FOR THE DEFENDANT</p> <p>22 BY MS. BREDEHOFT:</p>	<p>175</p> <p>1 A -- that I know of that could cover stuff</p> <p>2 like that. That's still considered light makeup.</p> <p>3 Q And that was going to be my next question.</p> <p>4 If Ms. Heard had bruises or swelling, there's</p> <p>5 certain things that she can do with makeup to</p> <p>6 cover those up because she doesn't want people to</p> <p>7 see those, would you agree?</p> <p>8 MS. VASQUEZ: Objection; calls for</p> <p>9 speculation.</p> <p>10 A With bruises, I agree. With swelling, I</p> <p>11 don't think -- I think I would have noticed that</p> <p>12 given our distance --</p> <p>13 Q But you --</p> <p>14 A -- any kind of --</p> <p>15 Q But you weren't looking for swelling;</p> <p>16 right? You didn't have a clue that something had</p> <p>17 happened the night before?</p> <p>18 MS. VASQUEZ: Objection; assumes facts not</p> <p>19 in evidence; argumentative; asked and answered.</p> <p>20 A I wasn't looking, but I think given seeing</p> <p>21 anyone at a certain caliber, you just -- attention</p> <p>22 to detail, and I think I would have noticed</p> <p>L, R, SP, F/A, Lack of Pers. Know., Improper Opinion</p>
<p>174</p> <p>1 Q Okay. Mr. Harrell, I still have -- I have</p> <p>2 a few more. I get to go last since I started.</p> <p>3 I'll try to make it as quick as possible.</p> <p>4 Now, you testified -- you testified that</p> <p>5 Ms. Heard was wearing -- that Amber Heard was</p> <p>6 wearing makeup that you recall on that day on</p> <p>7 May 22nd, 2016; is that correct?</p> <p>8 A Yes.</p> <p>9 Q Okay. And I think I wrote it down too,</p> <p>10 because you testified a little bit more about it</p> <p>11 in response to Mr. Depp's counsel's questions, but</p> <p>12 you said that you thought she may have had some</p> <p>13 concealer, some powder, some blush, and some</p> <p>14 glittery makeup, do you recall that?</p> <p>15 A I do recall saying she may have had</p> <p>16 something like airy, like those products. I don't</p> <p>17 know if she had all of those products on at once</p> <p>18 but I -- when I say light to minimal, I mean she</p> <p>19 could've had something small as concealer, just</p> <p>20 light makeup when I gave you the examples that you</p> <p>21 named --</p> <p>22 Q Now --</p>	<p>176</p> <p>1 something like that before, because I remember</p> <p>2 seeing her and her being so beautiful that if she</p> <p>3 had any kind of imperfection, I would've noticed</p> <p>4 it. Like, if something wasn't okay, I probably</p> <p>5 would've noticed it. And I remember talking to</p> <p>6 her. And given my experience with people who have</p> <p>7 had -- something happened, it's not as easy as a</p> <p>8 conversation that -- as I remember the</p> <p>9 conversation with her, if that makes sense.</p> <p>10 Q So I want to just stay on that for a</p> <p>11 moment. How much experience do you have with the</p> <p>12 evolution of bruising and swelling after somebody</p> <p>13 has been beaten?</p> <p>14 MS. VASQUEZ: Objection; argumentative.</p> <p>15 A I mean, my experience varies. I think I'm</p> <p>16 obviously a different ethnic group, bruising looks</p> <p>17 completely different than -- people of my color</p> <p>18 than people of her color. But I think swelling is</p> <p>19 different, and I think -- I have a lot of</p> <p>20 girlfriends, I wear makeup myself, I know what</p> <p>21 swelling would look like with makeup trying to be</p> <p>22 covered up. I mean, I have a lot of girlfriends,</p> <p>L, R Argument.</p>

L, R,
Argument

L, R, SP,
F/A, Lack
of Pers
Know.,

Improper
Opinion

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1 I have a lot of friends who have done that before,
2 I would noticed swelling covered by makeup versus
3 bruising covered by makeup, if that makes sense.
4 Q All right. So -- and let me ask this a
5 different way. And I think you have indicated
6 that if Ms. Heard had bruises she could've covered
7 that up with the type of makeup she had on
8 May 22nd; correct?
9 A Correct.
10 Q But let's talk about whether there was
11 swelling or not. How long after a punch or a hit
12 or an object hits somebody does the swelling show
13 itself?
14 MS. VASQUEZ: Objection; calls for
15 speculation; asked -- calls for an expert opinion.
16 Q Do you know?
17 A From my experience, 20 minutes,
18 30 minutes. I mean, fairly soon. I think
19 swelling is the ability to try to have your body
20 repair the wounded area and then the blood kind of
21 vessels and circulates, so swelling in my opinion
22 could become before bruising or adjacently.

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1 Q So would you agree, though, that it might
2 make a difference on where the blow is and what
3 part it hits and how it hits --
4 MS. VASQUEZ: Objection.
5 Q -- and when that swelling occurs?
6 MS. VASQUEZ: Objection; vague and
7 ambiguous; calls for speculation; calls for an
8 expert opinion of a lay witness; improper
9 hypothetical.
10 Q Let me ask it this way, Mr. Harrell, have
11 you ever had surgery?
12 A Yes.
13 Q And do you recall that the swelling
14 sometimes comes several days later after surgery?
15 MS. VASQUEZ: Objection; incomplete
16 hypothetical.
17 A From my facial surgeries, no. It usually
18 happens within the same day and then it gets
19 better as the days progress. Bruising is
20 different. Bruising darkens as days go out, but
21 swelling's different. And I've had various facial
22 surgeries.

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1 Q Well, let's pull up Plaintiff's Exhibit 14
2 for a minute. This is plaintiff's, I'm looking
3 for Depp's here.
4 So, Mr. Harrell, is there swelling here?
5 A It does look like swelling.
6 Q Where is the swelling? Could you tell me
7 where it is?
8 A It looks like in the middle of that
9 bruised area. It looks like it protrudes off the
10 skin, it kind of comes up a little bit.
11 Q Now, is that -- do you know what day this
12 is after the injury?
13 A This, I have no idea.
14 Q Okay. Do you know what kind of swelling
15 patterns Amber has?
16 MS. VASQUEZ: Objection; calls for
17 speculation; it's an incomplete hypothetical.
18 Also assumes facts not in evidence.
19 A I'm sorry, was the question if I know what
20 kind of swelling patterns Amber has?
21 Q Yes.
22 A I don't know the swelling patterns Amber

L, R, H, F/A,
Improper
Opinion

L, R, H, F/A,

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1 has.
2 Q Okay. Now, I'm going to ask to pull up
3 Plaintiff's Exhibit 11. This is Depp's 11.
4 PLANET DEPOS TECHNICIAN: This is Alex,
5 the tech speaking. You're looking for the video,
6 ma'am?
7 MS. BREDEHOFT: No, it's plaintiff's
8 exhibit -- it's Depp's 11, I believe it was. It
9 was a picture. Another picture.
10 PLANET DEPOS TECHNICIAN: Eleven in my
11 files is an AVI video.
12 MS. BREDEHOFT: Let's try for Plaintiff's
13 13. I might have gotten that one wrong.
14 PLANET DEPOS TECHNICIAN: Oh, are you
15 looking for one that's already been brought up?
16 MS. BREDEHOFT: Yes.
17 PLANET DEPOS TECHNICIAN: I understand. I
18 have it.
19 Q Now, Mr. Harrell, do you know what day
20 this is from these injuries on Amber?
21 A No. I can assume something, but again
22 this is the first time that I'm seeing these

Improper Opinion

L, R, H, F/A,
Improper
Opinion

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L, R, H
F/A,
Improp
Opinion

1 photographs --
2 Q Yeah, I'm not --
3 A -- so I have no idea of the coincidence.
4 Q And I don't want you to assume anything.
5 I think it's pretty important not to assume
6 anything. But I think you've testified that this
7 particular picture could be covered up by makeup;
8 correct?
9 A Yes.
10 Q All right. And in fact, you felt that
11 whatever makeup that Amber had on May 22nd, if
12 this was her injuries on May 22nd could've been
13 covered up, would you agree?
14 A Sorry, can you answer the question -- or
15 ask the question straight?
16 Q I believe I understood your testimony in
17 response to Ms. Vasquez that if these injuries
18 were injuries that Ms. Heard had on May 22nd, the
19 makeup that she had on that day that you observed
20 could have covered these injuries up; correct?
21 MS. VASQUEZ: Objection; assumes facts not
22 in evidence.

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L, R, H
F/A,
Improp
Opinion

1 Q I'm asking, I believe you did say that,
2 did you not?
3 A If the sequence of days from this photo
4 here that I'm seeing, this day, it could be very
5 light makeup that covers that little mark.
6 Q Okay. Do you remember Ms. Vasquez saying
7 that the metadata on this particular picture was
8 May 22nd?
9 A I don't recall that, but is this the one
10 that she was referring to? Because there was a
11 different photo that we looked at.
12 Q This is the one that she was referring to
13 when she said that.
14 A Okay. What was the question?
15 Q So if this was May 22nd, which is what
16 Ms. Vasquez represented it to be, then when you
17 saw Amber Heard on May 22nd, the makeup that Amber
18 Heard had on that day could've covered this up;
19 correct?
20 MS. VASQUEZ: Objection; calls for
21 speculation; assumes facts not in evidence.
22 Q Correct? I'm sorry, Mr. Harrell --

183

L, R, H, F/A
Improper
Opinion

1 A Correct.
2 Q Okay. And you would not have noticed;
3 correct?
4 A Correct.
5 Q Okay. Let's -- I think you indicated that
6 you thought you had pretty good memory back in
7 2016, do you recall that?
8 A Yes, I do remember saying that.
9 Q I'm going to go ahead and go back to
10 Harrell No. 1. And do you recall giving -- you
11 recall giving your testimony on July 28th, 2016;
12 correct?
13 A I think that was the one at the Century
14 City building, I do believe I remember that.
15 Q Okay.
16 A The first one.
17 Q And you were under oath; correct?
18 A Yes.
19 MS. BREDEHOFT: All right. I'm going to
20 ask -- Alex, if you can go to page 19. And
21 actually, if I can take control, so I can --
22 there's a couple of lines right above, I'll just

184

R, H

1 go right above, if that's okay. Thank you.
2 Q So, Mr. Harrell, going to ask you to take
3 a look, starting on page 18 on line 23, do you see
4 that?
5 A Yes.
6 Q All right. And you were asked -- it asks
7 first --
8 Did you work on May 21st, you did not.
9 And then it says did you work on Sunday, May 22,
10 and you said, I did not. And then it says, do you
11 remember what time you worked? You said I did,
12 I'm sorry. Do you remember what time you worked?
13 Yes, my shift runs from 8:00 a.m. to 4:00 p.m.
14 And did you see Amber that day?
15 I did.
16 Where was Amber when you saw her that day?
17 She came to the front desk and she asked
18 about a package -- for a package that she
19 received.
20 So you were sitting at the front desk?
21 Yes.
22 And Amber walked up to the front desk?

185

R, H

1 Yes.
2 And how far apart were you from Amber at
3 this time?
4 It says, I was sitting down, she came to
5 the front desk, and I came across. She had a dog.
6 And I remember complimenting her dog. We
7 exchanged some dialogue and then she said I'm here
8 to pick up a package. And at that moment I
9 remember seeing a bunch of packages. I said,
10 okay, right this way. And we had an interaction.
11 We walked up to the packages room. We went
12 through a few different packages. And she's like,
13 I didn't want that one, I don't want that one, I
14 don't want that one. What I'm expecting is wine,
15 and I gave her wine -- and I gave her wine that
16 she was expecting and she was like thanks.
17 So you had a conversation with Amber?
18 Yes. For approximately -- I want to say
19 the whole interaction was probably like five to
20 eight minutes, primarily because it was -- it
21 started out with boy, how are you? I treat her
22 like every other resident. It was one of the

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1 first experiences --
2 Sorry, where did we go -- I just jumped
3 that one --
4 -- first experiences where we had dialogue
5 together and she had a dog and it just kind of
6 made sense to comment about a dog and then go into
7 reconciling her package, so five to eight
8 minutes.
9 It was a friendly conversation?
10 Yes.
11 Okay. Now. That's what you testified to
12 in July 2016; correct?
13 A Yes.
14 Q All right. And you didn't testify then to
15 another conversation, just this one, and it was
16 1:00; correct?
17 A The time, not correct, but yes, this only
18 one conversation.
19 Q Well, we looked at the video clip and it
20 was 1:00; correct?
21 A Yes, that wasn't this interaction,
22 correct.

L, R, H
F/A

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1 Q But you didn't testify to another
2 interaction, did you?
3 A All the --
4 MS. VASQUEZ: Objection; argumentative;
5 also misstates the testimony.
6 A I wasn't asked about another conversation.
7 Q Let's go down here. Page 22 line 19, "did
8 you see Amber again that day on the 22nd or was it
9 just the one encounter?" Just -- your answer was,
10 "Just the one encounter. Then I've seen -- not
11 physically, but I've seen her on the elevator."
12 Do you see that?
13 A Yes.
14 Q And that was the one where you talked
15 about her being in the elevator about an hour
16 later and she was hugging somebody and you
17 couldn't recall if it was a male or a female. I
18 thought it was a male, but it might have been a
19 female with an edgier style. Do you see that?
20 A Yes.
21 Q Okay. So you were asked if there was any
22 other encounters and that was that was the only

R, H

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1 one that you said in July of 2016 that you
2 recalled, do you remember that?
3 A Yes. Following this, yes.
4 MS. BREDEHOFT: Now, Alex, could you do me
5 a favor and bring up Harrell Exhibit 3, the
6 witness statement again. And I just want to make
7 sure -- and if I can control it. Thank you.
8 Alex, can I have control, please. Alex, did we
9 lose you? I think we --
10 PLANET DEPOS TECHNICIAN: Hi, I'm here, I
11 had to -- you should have control. Pardon me. I
12 just -- when you have control, I can't unmute
13 myself because I don't have the mouse.
14 MS. BREDEHOFT: Got it. Okay.
15 Q So, Mr. Harrell, I'm going to show you
16 what's been marked as Harrell Exhibit 3. Now,
17 just so we're clear, this witness statement was
18 submitted in the UK on behalf of the claimant,
19 Mr. Depp. Was that your understanding?
20 MS. VASQUEZ: Objection; the document
21 speaks for itself.
22 A Yes.

R, H

189

191

R

1 Q Okay. And it was your understanding that
2 whoever emailed you a declaration and you emailed
3 back with that person was creating this on behalf
4 of Mr. Depp; correct?
5 A I did not understand that at the moment.
6 Maybe it was my inability [sic] to really, like,
7 look at things. Again, I don't think it was
8 presented like this, but it was just kind of -- I
9 haven't been really looking at the header of who's
10 leading these, this is just inconvenient again.
11 It's just been like, okay, cooperate, I'm going to
12 cooperate and we'll figure it out. So I don't
13 really recollect who was -- whose lawyers were
14 telling me to go to the Century City office, the
15 downtown office, the written statement, and now
16 today, I couldn't tell you who was leading this.
17 I mean, it's you, but I don't know who you
18 represent -- I mean, it's not in my brain of who
19 you represent. You did tell me many times so I'm
20 aware now. But to answer your question, it makes
21 sense that you're following this, yes.

22 Q All right. So is it your -- I'm just a

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1 little confused after Ms. Vasquez's questions. Is
2 it your belief that whatever you saw and marked up
3 and sent back is not what this statement says?

4 A Can you clean that question up and ask it
5 again?

6 Q Yes. So is it -- did you intend for this
7 statement to be your statement filed with the UK
8 proceeding with your signature?

9 A No. What we read today I would have not
10 -- that's not really what I feel comfortable with.
11 I got this paper. Keep going down to the bottom,
12 all way down, down, down, I'll show you what I
13 got. I got this. This is what I got. This last
14 paper, and I got -- my name is signed there, but I
15 don't know what's at the top. I got this paper.
16 This is the one that I sent back to them.

17 Q And so you were not aware of this content
18 and you do not agree with this content, is that
19 fair to say?

20 MS. VASQUEZ: Objection.

21 A Some of --

22 MS. VASQUEZ: Objection; lacks foundation;

1 compound; misstates the testimony.

2 Q I'll make it cleaner. Mr. Harrell, we
3 talked when I first examined you before
4 Ms. Vasquez asked you questions and we went
5 through the whole thing in detail. Do you agree
6 that these -- this statement accurately reflects
7 the truth as you know it? L, R, H, P, Needlessly

8 A I do not.

Cumulative

9 MS. VASQUEZ: Same question --

10 Q Okay.

11 MS. VASQUEZ: -- same objections.

12 MS. BREDEHOFT: Let's -- let's pull up
13 real quickly, Harrell Exhibit 2.

14 Q And I just want to -- you were expressing
15 that you were not sure who had issued this, and so
16 I'm just going to highlight up here, this is Laura
17 Wasser, counsel for Mr. Depp that issued this
18 subpoena.

19 Does that help refresh your recollection?

20 A No, but I guess that clarifies it, yes.

21 Q Okay.

22 A This is the first one; right?

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1 Q This was your subpoena for your -- yes,
2 your July 28, 2016, deposition.

3 A We're bouncing around because the other
4 one that you just presented me was with -- the one
5 with The Sun, Sun something, that one was like the
6 last one; right?

7 Q That was -- according to that -- let's go
8 back up -- I don't want to --

9 A This one was '16, 2016. That one was in
10 2019. But there was something in the middle.

11 Q Okay. Okay.

12 A Sorry, does that make sense? Because this
13 one I remember, it was the one I was physically at
14 in Century City, but I believe the one that we
15 just referenced, The Sun one, that one --

16 Q I don't --

17 A -- the written one was a different
18 occasion.

19 Q I don't want to confuse you so let's go
20 back to Harrell Exhibit 3. And this one is dated
21 12 December 2019. It's three and a half years
22 later; correct?

L, R, H,
P,
Needles
Cumulat

<p>193</p> <p>1 A Yes.</p> <p>2 Q And this is the statement on behalf of</p> <p>3 Mr. Depp that's filed in the High Court of the</p> <p>4 Justice Queens Division in the United Kingdom.</p> <p>5 But I believe your testimony is that you</p> <p>6 are not in agreement with many of the things in</p> <p>7 this statement; is that correct?</p> <p>8 MS. VASQUEZ: Objection; misstates his</p> <p>9 testimony.</p> <p>10 A I'd say a lot of it's unfamiliar for me.</p> <p>11 A lot of it isn't my -- isn't my say to say</p> <p>12 anything about a lot of those things. I don't</p> <p>13 feel like I could have been of testimony to a lot</p> <p>14 of those letters.</p> <p>15 Q And then if we can go back to -- I would</p> <p>16 like to go back to Plaintiff's Exhibit 17. Not</p> <p>17 Plaintiff's, I'm sorry, Harrell Exhibit 17,</p> <p>18 please.</p> <p>19 And while Alex is bringing that up,</p> <p>20 Mr. Harrell, I just want to -- now having looked</p> <p>21 at your deposition testimony from July 28, 2016,</p> <p>22 that you only had one encounter with Amber Heard</p>	<p>195</p> <p>1 13:02:40, 50 seconds later. Now, do you know who</p> <p>2 selected -- who went through these videos and</p> <p>3 selected the video clips?</p> <p>4 A I have no idea.</p> <p>5 Q Did you ever tell anyone that you believe</p> <p>6 there was a possibility you might have had another</p> <p>7 encounter with Amber that day?</p> <p>8 A I don't recall.</p> <p>9 Q And just so --</p> <p>10 MS. BREDEHOFT: You can take this down now</p> <p>11 Alex.</p> <p>12 Q Just so we're clear, you are not able to</p> <p>13 testify to whether Johnny Depp committed domestic</p> <p>14 violence on Amber Heard on May 21st, 2016; is that</p> <p>15 correct?</p> <p>16 MS. VASQUEZ: Objection; asked and</p> <p>17 answered; calls for speculation.</p> <p>18 A I believe that I am not.</p> <p>19 MS. BREDEHOFT: Thank you. I have no</p> <p>20 further questions.</p> <p>21 MS. VASQUEZ: Ms. Bredehoft, before we get</p> <p>22 off the record, I did want to represent to you</p>
<p>194</p> <p>1 that day at 1:00 and then you had the time you saw</p> <p>2 her in the elevator, I'd like to go back and just</p> <p>3 take another look at the video clip from the</p> <p>4 encounter that you had with Amber Heard on</p> <p>5 May 22nd, 2016.</p> <p>6 MS. BREDEHOFT: And I'm going to -- Alex,</p> <p>7 I'm going to take control just to move a little</p> <p>8 bit faster this one part here.</p> <p>9 Q Now, do you see the person walking those</p> <p>10 dogs? Did you see that there?</p> <p>11 A Yes.</p> <p>12 Q Okay. Did you confuse in your mind</p> <p>13 perhaps somebody else having dogs in the mere time</p> <p>14 frame of Amber Heard having come to the desk?</p> <p>15 MS. VASQUEZ: Objection; argumentative.</p> <p>16 A I don't think so.</p> <p>17 Q All right.</p> <p>18 A Maybe confusing a couple dates.</p> <p>19 Q Okay. So we have Amber Heard approaching</p> <p>20 you at 13:00:58, do you see that? And we'll just</p> <p>21 watch this again. And then you're heading around</p> <p>22 the corner at 13:01:50. There you returned at</p>	<p>196</p> <p>1 that as I predicted, both of Mr. Harrell's</p> <p>2 depositions have been produced in discovery, the</p> <p>3 one from the divorce proceeding in 2016 along with</p> <p>4 the Bloom Hergott deposition in 2019. Bates</p> <p>5 labeled Depp00016433 through 00017220.</p> <p>6 MS. BREDEHOFT: Do you have the date that</p> <p>7 that was produced?</p> <p>8 MS. VASQUEZ: I don't have the date, but I</p> <p>9 can assume it was probably in August -- August of</p> <p>10 2020.</p> <p>11 MS. BREDEHOFT: All right. We'll check on</p> <p>12 that.</p> <p>13 Mr. Harrell, this deposition is going to</p> <p>14 be typed up, and you have the right to read the</p> <p>15 deposition, of course it's also being videotaped,</p> <p>16 but you still have the right to read the</p> <p>17 deposition and look at it, and if you find</p> <p>18 anything that's in error you can make corrections.</p> <p>19 Do you want to read or would you like to</p> <p>20 waive the reading of the deposition?</p> <p>21 THE WITNESS: I can waive that reading.</p> <p>22 MS. BREDEHOFT: Okay. All right. Thank</p>


Transcript of Cornelius Harrell
Conducted on January 13, 2021

50 (197 to 200)

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1 you very much for being here. We know that it's
2 an inconvenience to you. We very much appreciate
3 it. Have a good night.
4 THE VIDEOGRAPHER: So it is the end of the
5 deposition of Cornelius Harrell. It is 9:12 p.m.
6 We go off the record.
7 (Off the record at 9:12 p.m.)
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1 CERTIFICATE OF SHORTHAND REPORTER-NOTARY PUBLIC
2 I, PAUL P. SMAKULA, the officer before whom
3 the foregoing deposition was taken, do hereby
4 certify that the foregoing transcript is a true
5 and correct record of the testimony given; that
6 said testimony was taken by me stenographically
7 and thereafter reduced to typewriting under my
8 direction; that reading and signing was not
9 requested; and that I am neither counsel for,
10 related to, nor employed by any of the parties to
11 this case and have no interest, financial or
12 otherwise, in its outcome.
13
14 IN WITNESS WHEREOF, I have hereunto set my hand
15 and affixed my notarial seal this 21st day of
16 January, 2021.
17
18 My commission expires: June 18, 2023.
19
20 
21 NOTARY PUBLIC IN AND FOR
22 THE STATE OF MARYLAND