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CL-2019-0002911

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Transcript of Dr. Connell Cowan

Date: December 8, 2021

Case: Depp, II -v- Heard

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1 (1 to 4)

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	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
IN THE CIRCUIT COURT FOR FAIRFAX COUNTY, VIRGINIA ----- x JOHN C. DEPP, II, : Plaintiff and : Counter-Defendant, : Civil Action No. v. : CL-2019-0002911 AMBER LAURA HEARD, : Defendant and : Counter-Plaintiff. : ----- x VIDEOTAPED DEPOSITION OF DR. CONNELL COWAN CONFIDENTIAL HELD REMOTELY Wednesday, December 8, 2021 9:30 am PST / 12:30 pm EST Job No.: 416245 Pages: 1 - 324 Reported By: Debi Pearce	APPEARANCES APPEARING VIA VIDEOCONFERENCE ON BEHALF OF PLAINTIFF JOHN C. DEPP, II: BENJAMIN CHEW, ESQUIRE BROWN RUDNICK, LLP 601 Thirteenth Street, N.W. Washington, D.C. 20005 202.536.1700 APPEARING VIA VIDEOCONFERENCE ON BEHALF OF PLAINTIFF JOHN C. DEPP, II: LEO PRESIADO, ESQUIRE STEPHANIE CALNAN, ESQUIRE CAMILLE VASQUEZ, ESQUIRE BROWN RUDNICK, LLP 2211 Michelson Drive 7th Floor Irvine, California 92612 949.752.7100	APPEARANCES APPEARING VIA VIDEOCONFERENCE ON BEHALF OF DEFENDANT AMBER LAURA HEARD: ADAM NADELHAFT, ESQUIRE CLARISSA PINTADO, ESQUIRE CHARLSON BREDEHOFT COHEN & BROWN, P.C. Suite 201 11260 Roger Bacon Drive Reston, Virginia 20190 703.318.6800 ALSO PRESENT: JEREMY DINEEN, PLANET DEPOS VIDEOGRAPHER BRENNAN PLUMMER, PLANET DEPOS TECHNICIAN DR. SHANNON CURRY	VIDEOTAPED deposition of DR. CONNELL COWAN, held remotely, pursuant to notice, before Debi Pearce, Notary Public in and for the State of Maryland and the Commonwealth of Virginia.

2 (5 to 8)

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3 (9 to 12)

9	11
1 more introductions on our side.	1 Q Okay. All right. Let me just go over a
2 THE VIDEOGRAPHER: I apologize.	2 few rules for a deposition. At least to start
3 MR. PRESIADO: No problem	3 off, I'm going to be asking you a series of
4 MS. CALNAN: Stephanie Calnan also on	4 questions. If you, at anytime, don't understand
5 behalf of Mr. Depp.	5 my question, can't hear it, please let me know.
6 MR. CHEW: Ben Chew, for Mr. Depp as well.	6 A Okay.
7 THE VIDEOGRAPHER: The court reporter is	7 Q Once -- if you've answered a question, it
8 Debi Pearce, representing Planet Depos.	8 will be assumed that you understood the question
9 Will the reporter please swear in the	9 and heard it; does that make sense?
10 witness.	10 A Yes, it does.
11 CONNELL COWAN,	11 Q Okay. As you've been doing, please make
12 HAVING BEEN FIRST DULY SWORN/AFFIRMED, WAS	12 sure you answer my questions verbally. You know,
13 EXAMINED AND TESTIFIED UNDER OATH AS FOLLOWS:	13 a nod of the head or a shake of the head isn't
14 THE WITNESS: Yes, I do.	14 going to be picked up by the court reporter. So
15 THE COURT REPORTER: Thank you.	15 if you want to answer "yes" to something, please
16 THE TECHNICIAN: And before we start, we	16 answer "yes," rather than shaking your head up and
17 just had a Camille join as well.	17 down, or if you want to say "no," say "no," rather
18 MS. VASQUEZ: That's correct.	18 than shaking your head.
19 Camille Vasquez, on behalf of Mr. Depp.	19 Does that make sense?
20 MR. NADELHAFT: Okay. Is everyone here	20 A Yes, it does.
21 for Mr. Depp's side? Are we ready now?	21 Q Okay. And given that we are -- at any
22 MR. PRESIADO: Yes.	22 time if you need to take a break, just let me
10	12
1 BY MR. NADELHAFT:	1 know. I only ask that you answer the question
2 Q Okay. Good morning. We had met before	2 pending, and then we'll, you know, we'll give you
3 this started. My name is Adam Nadelhaft. I'm	3 a break.
4 here with Clarissa Pintado. We represent	4 A Okay.
5 Amber Heard. We, along with Amber, thank you for	5 Q Is that okay? Thank you.
6 your time today.	6 And also, I'm going to do my best to not
7 Can you please provide your full name.	7 interrupt you when you're answering a question.
8 A Yes, Connell Cowan.	8 This is hard while we're over Zoom, but try to
9 Q And what's your business address?	9 wait for me to finish my answer before you -- my
10 A It's 15355 Mulholland Drive, Los Angeles,	10 question before you answer.
11 California, the ZIP is 90077.	11 Does that make sense?
12 Q And you, occasionally, would use a cell	12 A Yes, it does.
13 phone to text with Amber; is that correct?	13 Q Okay. And given that we are in the Zoom,
14 A Yes, that's correct.	14 as opposed to being face to face, are there any
15 Q And what was the phone number for the cell	15 documents, either on your computer or in front of
16 phone you used?	16 you, that you are going to be referring to today?
17 A 323-363-8454.	17 A No.
18 Q And what's your e-mail address?	18 Q Okay. Well, since you've never been
19 A It's concowan@gmail.com.	19 deposed before, I assume you've never been deposed
20 Q And, Dr. Cowan, you've been deposed	20 in any cases involving Mr. Depp, correct?
21 before, I assume?	21 A That's correct.
22 A No, I have not.	22 Q And you've never been deposed in any cases

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4 (13 to 16)

13	<p>1 involving Amber Heard, correct?</p> <p>2 A That's correct.</p> <p>3 Q And you're a doctor, correct?</p> <p>4 A I'm a psychologist, a clinical</p> <p>5 psychologist.</p> <p>6 Q Okay. For how long have you been a</p> <p>7 clinical psychologist?</p> <p>8 A Forty years.</p> <p>9 Q And where did you go to school for that?</p> <p>10 A University of Houston.</p> <p>11 Q And, in your 40 years of practice, were</p> <p>12 you always -- have you always been working in</p> <p>13 Los Angeles?</p> <p>14 A Primarily, in Los Angeles. I mean, I got</p> <p>15 my Ph.D. in Texas, but since then, yeah, my</p> <p>16 practice has been in Los Angeles.</p> <p>17 Q Okay. So how long have you practiced in</p> <p>18 Los Angeles?</p> <p>19 A Well, that's -- my entire practice has</p> <p>20 been in Los Angeles.</p> <p>21 Q And you've practiced psychotherapy; is</p> <p>22 that right?</p>	15	<p>1 Q Okay.</p> <p>2 A I don't mean that it's infallible, but,</p> <p>3 you know, you learn to know whether somebody is</p> <p>4 being honest and authentic, or whether they're</p> <p>5 bending the truth.</p> <p>6 Q And you've worked with patients on their</p> <p>7 relationships, correct?</p> <p>8 A Yes, I have.</p> <p>9 Q Including their romantic relationships,</p> <p>10 correct?</p> <p>11 A Yes.</p> <p>12 Q All right. Have you worked with patients</p> <p>13 that have been abused by their romantic partners?</p> <p>14 A Yes.</p> <p>15 Q Is a symptom of a patient who has been</p> <p>16 abused by her romantic partner anxiety?</p> <p>17 A Yes.</p> <p>18 MR. PRESIADO: Objection, vague,</p> <p>19 ambiguous, and overbroad.</p> <p>20 BY MR. NADELHAFT:</p> <p>21 Q Okay. And, Dr. Cowan, there will be</p> <p>22 occasional times where I'm going to be asking a</p>
14	<p>1 A That's correct, yes.</p> <p>2 Q And can you explain what psychotherapy is.</p> <p>3 A Psychotherapy is talk therapy. It's --</p> <p>4 it's an attempt to help people understand the</p> <p>5 issues that they're struggling with in their</p> <p>6 lives, and to find better ways to modulate their</p> <p>7 emotions and conduct their relationships in</p> <p>8 healthier and more constructive ways.</p> <p>9 Q And when you work with patients, you're</p> <p>10 looking for them to be truthful with you, correct?</p> <p>11 A Yes.</p> <p>12 Q Have you received any training to</p> <p>13 determine if a patient of yours is not being</p> <p>14 truthful with you?</p> <p>15 A No, not specifically.</p> <p>16 Q But, in your years of experience, you can</p> <p>17 tell if a patient is being truthful with you or</p> <p>18 not?</p> <p>19 A I think, over time, I can tell. It's --</p> <p>20 I'm limited by what somebody says to me, but I've</p> <p>21 got a pretty good nose for someone who's lying and</p> <p>22 bending the truth, over time.</p>	16	<p>1 question and Mr. Depp's counsel is going to lodge</p> <p>2 an objection, like he did there. So you know,</p> <p>3 he's going to lodge his objection and then, you</p> <p>4 know, you can answer. So that was the voice you</p> <p>5 heard.</p> <p>6 A Let me ask -- let me clarify that. If</p> <p>7 there's an objection, there is no judge that is</p> <p>8 going to sustain it or overrule it, so do I answer</p> <p>9 the question, or not?</p> <p>10 Q And that's a great question.</p> <p>11 Yes, for the most part, you would answer</p> <p>12 the question. The only time you wouldn't answer</p> <p>13 the question would be if there's some sort of</p> <p>14 privilege issue, and then -- you don't have</p> <p>15 counsel here today, but that may be an issue -- I</p> <p>16 don't suspect that's an issue, I don't think it</p> <p>17 will be an issue, but, for the most part, this is</p> <p>18 just an objection that is for the record and then</p> <p>19 a judge may be ruling on that down the road; but</p> <p>20 you should answer the question.</p> <p>21 A Okay.</p> <p>22 MR. PRESIADO: And, if I can interject,</p>

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5 (17 to 20)

17	1 Dr. Cowan, I will be objecting, and counsel will 2 probably be objecting when I ask you questions. 3 It helps, for the purposes of the transcript and 4 for the court reporter, that, if you hesitate 5 before you answer, so that my objection doesn't 6 trample over your answer. I know it's hard to do 7 because that's not how people talk to each other, 8 but if you keep that in mind, I think this will go 9 much smoother. 10 THE WITNESS: Okay. 11 MR. NADELHAFT: And, Debi, did you get 12 Dr. Cowan's answer to that question? 13 THE COURT REPORTER: Let me check. 14 No. 15 BY MR. NADELHAFT: 16 Q Okay. I'll ask again. 17 Is a symptom of a patient who's been 18 abused by her romantic partner anxiety? 19 MR. PRESIADO: Objection, overbroad, calls 20 for speculation, vague and ambiguous. 21 A It certainly can be. 22 Q Is another symptom of a patient who has	19	1 services for other actors and actresses; is that 2 right? 3 A Yes, I have. 4 Q Okay. And you're also an author; is that 5 right? 6 A Yeah. 7 Q And you've written, you've written a 8 number of books? 9 A Yes. 10 Q All right. And most of -- all of those 11 books deal with how to deal with relationships; is 12 that correct? 13 A Yes. 14 Q All right. You wrote, "Smart Women, 15 Foolish Choices." What's that book about? 16 A Well, kind of what the title implies. It 17 was really designed to look at women who had had 18 their lives, you know, organized in very healthy 19 and constructive ways, had great friends, careers, 20 everything was, you know, kind of moving along and 21 in good ways for them, except their relationship. 22 So it was looking at that one area of
18	1 been abused by her romantic partner depression? 2 MR. PRESIADO: Same objection. 3 A Again, it can be. 4 Q Okay. And, in working with patients who 5 have been abused by their romantic partners, have 6 any patients ever tried to minimize to you the 7 abuse they endured? 8 A Yes. 9 Q And minimizing abuse is not atypical of an 10 abuse victim, correct? 11 MR. PRESIADO: Objection, overbroad, calls 12 for speculation. 13 A No. 14 Q And, in working with patients that have 15 been abused by their romantic partners, have there 16 been patients who focused on trying to fix their 17 relationship with their romantic partner rather 18 than document the abuse to you? 19 A Yes. 20 Q Now, you've been working in Los Angeles 21 for 40 years. Without providing any names, other 22 than Amber Heard, I assume you've provided	20	1 their lives where they had some issues. And it 2 was explored in a variety of ways. 3 Q So, "Smart Women, Foolish Choices," in a 4 nutshell, was about how bright women are often -- 5 drawn -- powerfully drawn to the wrong men; is 6 that right? 7 A They can be, yeah. 8 Q And you also wrote, "The Art of War for 9 Lovers"? 10 A Yes. Yes. 11 Q Briefly, what's that book about? 12 A Well, that was -- it was translating the 13 Sun Tzu's, "Art of War," in terms of relationship. 14 Q Okay. And you also wrote, "Women Men 15 Love, Women Men Leave"; is that right? 16 A Yes. 17 Q And what was that book about? 18 A It was about the kinds of things that go 19 on in relationships that work. That are 20 constructive that lead to sustained relationships, 21 and those things, those dynamics that are 22 destructive or self-defeating, and lead to

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6 (21 to 24)

21	<p>1 relationships that, eventually, are not</p> <p>2 sustainable.</p> <p>3 Q Okay. So there are -- you would believe</p> <p>4 there are certain relationships that are not</p> <p>5 sustainable; is that right?</p> <p>6 A Yes.</p> <p>7 Q And you also wrote, "Husbands and Wives";</p> <p>8 is that right?</p> <p>9 A That's correct.</p> <p>10 Q And what was that book about?</p> <p>11 A It was about marriage.</p> <p>12 Q Between husbands and wives, I assume,</p> <p>13 right?</p> <p>14 A It was about, you know, the things that</p> <p>15 make marriages work and those elements that are</p> <p>16 destructive to marriages.</p> <p>17 Q Okay. What are some of the elements that</p> <p>18 are destructive to marriages?</p> <p>19 A Control, you know, over control, deceit,</p> <p>20 selfishness, lack of clarity, personal clarity,</p> <p>21 not knowing how to fight constructively,</p> <p>22 co-dependencies, being overly dependent,</p>	23	<p>1 A Yes, I do.</p> <p>2 Q For how long have you known Dr. Kipper?</p> <p>3 A Thirty years.</p> <p>4 Q And do you --</p> <p>5 A A long time.</p> <p>6 Q Do you consider Dr. Kipper a friend?</p> <p>7 A Yes.</p> <p>8 Q What type of doctor is Dr. Kipper?</p> <p>9 A He is an internist.</p> <p>10 Q And does Dr. Kipper refer patients to you?</p> <p>11 A Yes.</p> <p>12 Q Do you refer patients to Dr. Kipper?</p> <p>13 A Yes, I do.</p> <p>14 Q Are you and Dr. Kipper writing anything</p> <p>15 together?</p> <p>16 A We're writing the book, that last book</p> <p>17 that I mentioned, "Override."</p> <p>18 Q Okay. Have you ever written anything else</p> <p>19 with Dr. Kipper?</p> <p>20 A No.</p> <p>21 Q So I assume, in your friendship and now</p> <p>22 writing a book with Dr. Kipper, you communicate</p>
22	<p>1 insecurities that are kind of -- run amuck. I</p> <p>2 mean, those are among some of the elements. You</p> <p>3 know, an inability to deal with anger</p> <p>4 constructively, reliving, you know, old wounds in</p> <p>5 -- and acting out old things from, you know, the</p> <p>6 past that kind of manifest themselves in the</p> <p>7 marriage. I mean, those are a few of the</p> <p>8 problems.</p> <p>9 Q Thank you.</p> <p>10 Have you written any other books?</p> <p>11 A I've got a couple of books that I'm</p> <p>12 working on now. One is going to be published in</p> <p>13 -- I'm not sure what the pub date is. But, again,</p> <p>14 in six or nine months.</p> <p>15 Q Okay. And what's that book about?</p> <p>16 A It's about brain chemistry, actually.</p> <p>17 It's about the imbalances that we all have,</p> <p>18 subtle, in our brain chemistry, that affect us in</p> <p>19 the big spheres of our lives, work, relationships,</p> <p>20 and how -- it's called "Override."</p> <p>21 Q All right. And do you know a</p> <p>22 Dr. David Kipper?</p>	24	<p>1 with him often?</p> <p>2 A Yes.</p> <p>3 Q Okay. When was the last time you</p> <p>4 communicated with Dr. Kipper?</p> <p>5 A This week.</p> <p>6 Q Did you talk, at all, with Dr. Kipper</p> <p>7 about Dr. Kipper's deposition in this case?</p> <p>8 A Yeah. I did have one conversation with</p> <p>9 him about that, yes.</p> <p>10 Q Do you recall when that conversation was</p> <p>11 with Dr. Kipper?</p> <p>12 A I think it was a couple of months ago.</p> <p>13 Q Do you recall what was said in that</p> <p>14 conversation with Dr. Kipper about his deposition?</p> <p>15 A What I recall him saying was that, during</p> <p>16 the deposition, he had been asked if he had</p> <p>17 noticed any kind of physical bruising, you know,</p> <p>18 to Amber, and that he -- at the time she came to</p> <p>19 the office, that he was -- I'm not sure where he</p> <p>20 was, but he wasn't in the office, and so that he</p> <p>21 couldn't comment on that because he hadn't seen</p> <p>22 anything. That's, basically, you know, what I</p>

<p>25</p> <p>1 recall from the conversation.</p> <p>2 Q Do you recall saying anything to</p> <p>3 Dr. Kipper during this conversation about</p> <p>4 Dr. Kipper's deposition?</p> <p>5 A No. Not that I recall. It was really</p> <p>6 about his describing what -- you know, what</p> <p>7 experience he had.</p> <p>8 Q Do you recall when he was talking about</p> <p>9 whether -- when Dr. Kipper was talking about</p> <p>10 whether Dr. Kipper saw any bruising of Amber, what</p> <p>11 event or time that was where he was being asked if</p> <p>12 he saw bruising on Amber?</p> <p>13 A What "event or time" -- I'm not sure what</p> <p>14 that means.</p> <p>15 Q I appreciate that.</p> <p>16 Dr. Kipper told you that he was asked if</p> <p>17 he saw any bruising. I was wondering if he</p> <p>18 described -- if he described that he was asked if</p> <p>19 he saw any bruising after a particular event that</p> <p>20 occurred to Amber?</p> <p>21 MR. PRESIADO: Objection to the extent it</p> <p>22 calls for hearsay.</p>	<p>27</p> <p>1 date in front of me, but it was 2014.</p> <p>2 Q Did you know Amber, personally, before she</p> <p>3 was referred to you by Dr. Kipper?</p> <p>4 A No, I did not.</p> <p>5 Q And was Amber a patient of Dr. Kipper</p> <p>6 before she was referred to you?</p> <p>7 A I'm assuming she was, yes.</p> <p>8 Q Do you have any understanding as to why</p> <p>9 Amber was a patient of Dr. Kipper's?</p> <p>10 A No. I'm assuming she went to see</p> <p>11 Dr. Kipper, you know, for her general health, in</p> <p>12 that he's an internist.</p> <p>13 Q And do you know, approximately, how long</p> <p>14 he treated Amber for?</p> <p>15 A No, I don't.</p> <p>16 Q Does approximately two years or so sound</p> <p>17 about right, ending in 2016?</p> <p>18 A Yeah, I don't know when he first started</p> <p>19 seeing Amber; but, you know, I started seeing her</p> <p>20 in 2014, and I'm assuming he was seeing her, you</p> <p>21 know, pretty much throughout the time that I was</p> <p>22 seeing her.</p>
<p>26</p> <p>1 BY MR. NADELHAFT:</p> <p>2 Q And you can answer.</p> <p>3 A I just recall him saying that she had come</p> <p>4 to the office, but that he wasn't there. He was</p> <p>5 -- so Amber was seen by a PA, and that he had --</p> <p>6 he had no -- nothing to comment about it, because</p> <p>7 he wasn't there.</p> <p>8 Q Okay.</p> <p>9 A The -- I don't recall whether he said it</p> <p>10 was after an event, but I'm assuming it was after</p> <p>11 an event. I mean, that's my assumption. I don't</p> <p>12 recall him, specifically, saying that, though.</p> <p>13 Q Okay. Thank you.</p> <p>14 Now, Amber Heard was a patient of yours,</p> <p>15 correct?</p> <p>16 A Yes, she was.</p> <p>17 Q And Amber was referred to you by</p> <p>18 Dr. Kipper; isn't that right?</p> <p>19 A Yeah.</p> <p>20 Q And would you agree that Amber became your</p> <p>21 patient in, approximately, August of 2014?</p> <p>22 A Yes. I don't have -- I don't have that</p>	<p>28</p> <p>1 Q And, I'm sorry, I may have misstated or</p> <p>2 you may have misheard my question.</p> <p>3 How long did you treat Amber for?</p> <p>4 A Approximately, two years.</p> <p>5 Q Okay. And, in treating Amber, did you</p> <p>6 make any diagnoses of her?</p> <p>7 A You know, I don't tend to work that way.</p> <p>8 You know, I certainly understand, you know, the</p> <p>9 DSM, but I find that working from a diagnosis</p> <p>10 doesn't really work well with psychotherapy. You</p> <p>11 know, I look at symptoms, I look at what's going</p> <p>12 on in a person's life, but I don't find a</p> <p>13 particular diagnosis helpful. So I don't --</p> <p>14 that's just my frame of reference.</p> <p>15 Q Okay. And you didn't diagnose Amber as</p> <p>16 having a borderline personality disorder, correct?</p> <p>17 A No.</p> <p>18 Q Was Johnny Depp a patient of yours?</p> <p>19 A No.</p> <p>20 Q Do you know if Mr. Depp went to any</p> <p>21 therapy when you were working with Amber?</p> <p>22 A My understanding is that he did. I think</p>

<p>29</p> <p>1 he saw a psychiatrist at that time. I saw 2 Mr. Depp one time. He came in with Amber, and, 3 it's my understanding that he saw someone else for 4 therapy. I don't know for what duration, but 5 alone and with Amber, at least for some period of 6 time. I don't know who that psychiatrist was. 7 Q Okay. Do you know if it was 8 Dr. Alan Blaustein? 9 A I think the original person he saw was 10 Alan Blaustein. Whether Alan Blaustein was the 11 person that they saw together or not, I don't 12 recall. 13 Q And do you recall the person that Mr. Depp 14 and Amber saw together, other than you, was a man 15 or a woman? 16 MR. PRESIADO: Objection to the extent it 17 calls for speculation. 18 A I don't — I don't know that. 19 Q Okay. Did you ever know Mr. Depp 20 personally? 21 A No. 22 Q And Mr. Depp was a patient of</p>	<p>31</p> <p>1 medications she was on. I don't have that list 2 now, but she was taking some medication. That's, 3 basically, it. 4 Q All right. And, in working with Amber, 5 what was your understanding of Mr. Depp's feelings 6 toward Amber? 7 MR. PRESIADO: Objection, calls for 8 speculation, lacks foundation. 9 BY MR. NADELHAFT: 10 Q You can answer. 11 A Can you be a little more specific with 12 that. 13 Q Did you understand Mr. Depp was jealous of 14 other men in relationship to Amber? 15 MR. PRESIADO: Objection, lacks 16 foundation, calls for speculation, leading. 17 A Yes. 18 Q Was there a particular type of jealousy 19 that Mr. Depp had in regards to Amber? 20 MR. PRESIADO: Objection, vague and 21 ambiguous. 22 A What I understood, as a kind of an ongoing</p>
<p>30</p> <p>1 Dr. Kipper's; is that right? 2 A Yeah. 3 Q Do you know how long Mr. Depp had been a 4 patient of Dr. Kipper before you started seeing 5 Amber? 6 A No, I don't know. 7 Q Okay. And do you have any understanding 8 as to why Mr. Depp was a patient of Dr. Kipper? 9 A No. 10 MR. PRESIADO: Objection, lacks 11 foundation, calls for speculation. 12 A "No." 13 Q Okay. And when Amber was referred to you 14 by Dr. Kipper, Amber was in a relationship with 15 Mr. Depp; is that right? 16 A That's correct. 17 Q Okay. What information, if any, did 18 Dr. Kipper provide, to you, about Amber and 19 Mr. Depp's relationship? 20 A He just told me that he thought she was 21 struggling emotionally and that he asked if I 22 would see her. He told me what kind of</p>	<p>32</p> <p>1 dynamic in that relationship, was that he had 2 issues with the men that she worked with in her 3 professional life. So there was — there was a 4 lot of conflict around the choices that she was 5 making and the relationships she had with people 6 she worked with. 7 MR. PRESIADO: And if I can insert an 8 objection after that last question, lacks 9 foundation. 10 BY MR. NADELHAFT: 11 Q In working with Ms. Heard, did you have an 12 understanding that Mr. Depp had a possessive 13 jealousy about Amber? 14 MR. PRESIADO: Objection, lacks 15 foundation, calls for speculation. 16 A That was my understanding from her, yes. 17 Q And, in working with Amber, how did 18 Mr. Depp express his possessive jealousy of Amber 19 to her? 20 MR. PRESIADO: Objection, lacks 21 foundation, calls for speculation. 22 A Well, I think in accusations, suspicions</p>

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

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10 (37 to 40)

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

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11 (41 to 44)

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

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12 (45 to 48)

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

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13 (49 to 52)

<p>49</p> <p>1 MR. PRESIADO: Objection, asked and 2 answered, misstates testimony. 3 A Do I answer? 4 Q Yeah, you can answer. 5 A I was concerned, you know, for them both. 6 As I said, I was concerned, you know, more for her 7 emotional and mental well-being, but I understood 8 that, you know, they also got into some -- 9 something physical, and that was a danger too. 10 Q And where you wrote -- you wrote, "Staying 11 and using leads to what?" Where you wrote, "I 12 know you don't want him to go, but staying and 13 using leads to what?" 14 What were you referring to there? 15 A More emotional and, possibly, physical 16 turmoil and danger. 17 Q Okay. And is it -- in working with 18 patients, is it uncommon for someone to be in a 19 relationship and be abused, but not want to leave 20 their romantic partner? 21 MR. PRESIADO: Objection, vague and 22 ambiguous, calls for speculation, over broad.</p>	<p>51</p> <p>1 MR. NADELHAFT: Okay. And can we put up 2 Heard 32. 3 (Whereupon, the above-referenced document 4 was marked as Exhibit No. 3.) 5 (Document displayed.) 6 BY MR. NADELHAFT: 7 Q Dr. Cowan, in response to a subpoena, you 8 produced your, "Psychotherapy Progress Notes"; is 9 that right? 10 A Yes. What these are, these are really 11 process notes. I mean, I wasn't writing these to 12 document -- I mean, I wasn't anticipating this 13 process that we're going through today, so these 14 are really notes more to myself, in terms of 15 what's going on and what I think needs to be 16 addressed. 17 Q Right. So you're not taking notes, like 18 the court reporter is, and writing down everything 19 that someone says; is that right? 20 A No. 21 Q Okay. And you keep these notes in the 22 ordinary course of business?</p>
<p>50</p> <p>1 A Yes, that's a common dynamic. 2 Q Okay. And even during this time, in 3 December of 2015, was it your understanding that 4 Amber was trying to save her relationship and help 5 Mr. Depp? 6 A Yes, it was. 7 MR. PRESIADO: Objection, calls for 8 speculation, lacks foundation. 9 BY MR. NADELHAFT: 10 Q And, then, at the bottom of this, Cowan 11 Exhibit 2, you wrote, on December 22nd, 2015, 12 "Amber, please let me know how you are and what's 13 going on. Concerned that I haven't heard from 14 you." 15 What were you worried about? 16 A Well, I'm just trying to look at the 17 timeline. I'm not sure exactly what I meant -- 18 you know, this is a long time ago. But I'm 19 assuming that, you know, I knew that she was in 20 distress, and she had gone silent and I hadn't 21 heard from her. So I was trying to check in and 22 see how she was.</p>	<p>52</p> <p>1 A Yeah. 2 Q And these are notes from your file for 3 Amber Heard; is that right? 4 A That's correct. 5 Q Okay. And these are notes from 6 December 16th, 20- -- well, December 17th, 2015; 7 is that right? 8 A That's correct. 9 Q Okay. And in, "Mood/Affect," you wrote, 10 "anxious, sad"? 11 A Yes. 12 Q This is your handwriting, correct? 13 A Yes. 14 Q Okay. What did you mean by, "anxious, 15 sad"? 16 A That she was upset, experiencing anxiety 17 and sadness. She was -- she was very upset about 18 the relationship. 19 Q So Amber was experiencing anxiety and 20 sadness from her relationship with Mr. Depp, 21 right? 22 A Yes.</p>

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14 (53 to 56)

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

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15 (57 to 60)

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

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16 (61 to 64)

61	1 MR. NADELHAFT: Thanks. You can take this 2 down. 3 Can you put up Heard 2. 4 (Whereupon, the above-referenced document 5 was marked as Exhibit No. 5.) 6 (Document displayed.) 7 BY MR. NADELHAFT: 8 Q Dr. Cowan, I'm showing what's been marked 9 as Cowan Exhibit 5, and this is an e-mail between 10 you and Beverly Griffith. 11 Who is Ms. Griffith? 12 A She was my -- she did the billing for me. 13 Q Okay. And this e-mail came from your 14 e-mails? 15 A Yes, I don't remember even sending these 16 e-mails. 17 Can you make it bigger. 18 Q Sure. 19 THE TECHNICIAN: (Complies.) 20 BY MR. NADELHAFT: 21 Q And, actually, I wanted to ask you about 22 -- if we scroll down a bit -- can you read this?	63	1 Amber for an hour on August 30th, 2014? 2 A Yes, that's right. 3 Q And for the other months, where it says 4 the dates, like, for September, where it says, "1, 5 3, 5, 8, 10, 12, 15, 17, 19, 24, 29," you saw 6 Amber on all of those dates in September 2014? 7 A Yes. 8 Q Okay. And that would be the same 9 throughout this chart; that's what this chart is 10 showing, correct? 11 A Yes. 12 Q Okay. And with this chart in front of 13 you, would you agree that you first saw Amber on 14 August 26th, 2014? 15 A I'm assuming that was the first day, yes. 16 Q Okay. Do you know how Amber paid for your 17 services? 18 A Well, I sent a bill to her business 19 manager, and it was paid through that. 20 Q Okay. 21 A I never saw the checks. The checks were 22 sent and processed by Beverly Griffith. So I
62	1 A Yeah. 2 Q Okay. If we scroll down a little bit near 3 the bottom, where it says, "Hi Beverly, can you 4 please e-mail me a copy of Amber Heard's billing 5 records." 6 Do you see that? 7 A Yes. 8 Q So you wrote that e-mail to Beverly. 9 Do you recognize what is below, in this 10 chart? 11 A Well, yeah, I see the -- I see the -- I 12 see what's up here, the balances and so on. 13 Q And I just -- I'm just wanting to make 14 sure I am understanding what this document is 15 showing. What it's showing, for instance, 16 "Services Rendered," and, you know, there's, 17 "Date," and it says, "2014," and it says, 18 "August," and under, "Services Rendered," it says, 19 "26(2), 27(2)," and, "30." 20 Does that mean you saw Amber for two hours 21 on August 26th, 2014, two hours -- you saw Amber 22 for two hours on August 27th, 2014, and you saw	64	1 don't know who wrote the checks. 2 Q But you sent the bills to Amber Heard's 3 business manager? 4 A Yeah. 5 Q Okay. 6 MR. NADELHAFT: All right. We can take 7 this down. 8 And if we can put up Heard 3. 9 (Whereupon, the above-referenced document 10 was marked as Exhibit No. 6.) 11 (Document displayed.) 12 BY MR. NADELHAFT: 13 Q Dr. Cowan, I'm showing you what's been 14 marked as Cowan Exhibit 6, and these, again, are 15 your psychotherapy progress notes? 16 A Yeah. 17 Q Okay. And these notes are from 18 August 26th, 2014, correct? 19 A Yeah. 20 Q And the length of the session, this time, 21 was two hours? 22 A Yes.

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17 (65 to 68)

65	1 Q Okay. And these documents you keep in the 2 normal course of business? 3 A Yes. 4 Q And you would keep this document in a file 5 for Amber Heard? 6 A Yes, that's correct. 7 Q And this is your handwriting, correct? 8 A That's correct. 9 Q All right. Where it says, "Length of 10 Session," "2 hours," is that your -- is that 11 typical for a first visit? 12 A It's not untypical. You know, oftentimes, 13 I, you know, want to spend that amount of time 14 getting to know someone, yes. 15 Q Okay. And under, "Mood/Affect," it says, 16 "Amber is anxious about her future" -- is that 17 "with JD," or, "and JD"? 18 A It's, "with." 19 Q Okay. So it says, "Amber is anxious" -- 20 you wrote, "Amber is anxious about her future with 21 JD," and "JD," meaning Johnny Depp? 22 A That's correct.	67	1 that there was some amount of alcohol, and she was 2 taking Klonopin. 3 Q Okay. And, then, it says, a little bit 4 down, "I always get the brunt of J's abuse." 5 Correct? 6 A Yes. 7 Q And, "J," being Johnny Depp? 8 A Yeah. 9 Q And what did you understand Ms. Heard to 10 mean where she said, "I always get the brunt of 11 J's abuse"? 12 MR. PRESIADO: Objection, lacks 13 foundation, calls for speculation, relevance. 14 A You know, this is six years ago, seven 15 years ago, so I don't -- I'm assuming that what 16 she meant was something that she would describe 17 later on as what was, generally, felt to her as 18 abusive behavior, which was controlling, accusing, 19 suspicion, anger, rage. That's what I think she 20 meant when she gets the "brunt" of his behavior. 21 Q And working with Amber for the two years 22 you worked with her, she would tell you about
66	1 Q And then you wrote, "Insecure, wants to be 2 wanted badly," correct? 3 A That's correct. 4 Q Now, if we go to the bottom of the second 5 page, do you see where it says, "Three years ago 6 met Johnny." 7 Is that what it says? 8 A "Three years ago," yeah, "met Johnny," 9 that's correct. 10 Q And that's what Amber told you -- told 11 you, correct? 12 A Yes. 13 Q Okay. And, then, after that, what does 14 the next sentence say? 15 A I'm not sure. It looks like, "Last 12, 16 alcohol, Klonopin. Diagnosed with narcolepsy." 17 Q And I'm sorry not to step on, but is that, 18 "last 12," or "last 1 1/2," meaning last year and 19 a half? 20 MR. PRESIADO: Objection, leading. 21 A Oh, I see it now. Yes, it's, "1 1/2." I 22 guess I meant that, for the last year and a half,	68	1 those issues that she had with Mr. Depp, of being 2 controlling, his anger, his rage; is that right? 3 A Yes. 4 MR. PRESIADO: Objection, vague and 5 ambiguous. 6 THE WITNESS: Oh, I'm sorry. 7 MR. NADELHAFT: Can you read back the 8 question. 9 (The previous question was read back by 10 the court reporter.) 11 MR. PRESIADO: Same objection. 12 THE WITNESS: Yes. 13 BY MR. NADELHAFT: 14 Q And what did you understand as to what 15 "rage" meant? 16 MR. PRESIADO: Objection, lacks 17 foundation, calls for speculation. 18 A His angry outbursts. Primarily, his angry 19 outbursts. I mean, that's yelling, screaming at 20 her, that kind of thing. 21 Q And what about Mr. Depp being physical 22 with Amber at all?

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18 (69 to 72)

69	1 MR. PRESIADO: Objection, lacks 2 foundation, calls for speculation, assumes facts 3 not in evidence, leading. 4 A You know, other than the -- that time in 5 December, I don't recall him being physical. It 6 was much more verbal. You know, I considered it a 7 -- an abusive relationship, primarily verbally. 8 Q And when you say you considered it an 9 "abusive relationship," do you mean that Mr. Depp 10 was abusive towards Ms. Heard? 11 MR. PRESIADO: Objection, asked and 12 answered, calls for speculation, lacks foundation, 13 assumes facts not in evidence. 14 A I think they both went at it. I mean, you 15 know, Amber had a hard time controlling her own 16 emotions. She came from an abusive background. 17 Her father was abusive with her, she left home 18 very early to get out of a very dysfunctional 19 family. She was used to that kind of verbal, you 20 know, battering, and it was very familiar to her. 21 This is a common kind of dynamic, where 22 someone goes from one thing that feels familiar,	71	1 of Mr. Depp using Sharpies or paints to write 2 messages to Amber? 3 A No, I don't recall that. 4 Q Nothing like that? 5 A No. 6 Q Okay. Do you recall Mr. Depp writing any 7 messages to Amber in any sort of way that were 8 attributed to abuse or rage or anything like that? 9 MR. PRESIADO: Objection, vague and 10 ambiguous, calls for speculation, assumes facts 11 not in evidence. 12 A No, I don't. 13 Q Do you know if Mr. Depp had one of 14 Dr. Kipper's nurses available to him when he 15 needed? 16 A Yes, I do. 17 Q Do you know what that name of that nurse 18 was? 19 A I know the names, Debbie and Erin, are -- 20 kind of occur to me; but I'm not positive. 21 Q Okay. Debbie Lloyd? 22 A I don't know their last name.
70	1 to another that is equally familiar. So I bet 2 that that was -- that was what I saw in her, that 3 it was very similar to the kind of relationship 4 that she saw at home. 5 MR. PRESIADO: Objection to the last 6 question. 7 BY MR. NADELHAFT: 8 Q So what you saw was Ms. Heard receiving 9 battering from Mr. Depp, similar to what she 10 received from her father? 11 MR. PRESIADO: Objection, leading, lacks 12 foundation, assumes facts not in evidence, and 13 calls for speculation. 14 A She described her relationship with her 15 father as having been very abusive, and I felt 16 that the relationship she had with Johnny was -- 17 had similar elements of being abusive in a similar 18 way. 19 Q And abusive towards Ms. Heard, correct? 20 A Yeah. 21 Q Okay. Did you ever have any 22 understanding, in working with Ms. Heard, Amber,	72	1 Q And did you recommend that Amber should 2 also have a nurse for her? 3 A No, that was -- that was Dr. Kipper's 4 idea. 5 Q Do you know why Dr. Kipper thought that 6 Amber should have a nurse? 7 MR. PRESIADO: Objection, lacks 8 foundation, calls for speculation. 9 A I think he was being very cautious and 10 wanting to protect them both. 11 Q Did you ever speak with or communicate, at 12 all, with any -- with Amber's nurse? 13 A No. I never had any communications with 14 her. 15 MR. NADELHAFT: Can we put up Heard 5. 16 (Whereupon, the above-referenced document 17 was marked as Exhibit No. 7.) 18 (Document displayed.) 19 BY MR. NADELHAFT: 20 Q Dr. Cowan, I'm showing you what's been 21 marked as Cowan Exhibit 7. This is an e-mail from 22 you, to Amber Heard, on August 28th, 2014,

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19 (73 to 76)

73	1 correct? 2 A Yeah. 3 Q And you wrote, "Please give me a call 4 today and let me know how you are. I spoke with 5 Dr. Kipper yesterday, after your meeting with him, 6 and understand that things got heated. I'm sorry 7 these times are so painful and difficult, but I do 8 believe there can be smoother times ahead for you. 9 You will get through this and come out the better 10 for it. Believe in yourself, come from strength, 11 even when you don't feel it." 12 Do you know, what were you referring to 13 there? 14 A I – I don't – I don't recall what this 15 was about. 16 Q Okay. 17 A I'm not sure. 18 Q In sessions with Amber and in working with 19 Amber, did you feel that she was not "strong" in 20 her relationship with Mr. Depp? 21 MR. PRESIADO: Objection, vague and 22 ambiguous.	75	1 on the break that Amber -- you understand that 2 Amber had a nurse of her own, is that right, of 3 Dr. Kipper's? 4 A Yes. 5 Q Did you agree with Amber having a nurse? 6 A Did I agree with – I'm not sure what that 7 means. It was something – it was not – it was 8 not something – whether she had a nurse or not 9 was not a decision I participated in. 10 Q Okay. All right. And you never spoke to 11 any nurses of Amber's, correct? 12 A No. 13 Q And you never spoke to any nurses of 14 Mr. Depp; is that right? 15 A No. 16 MR. NADELHAFT: Okay. Can we put up 17 Heard 7. 18 THE TECHNICIAN: Sure. One moment. 19 MR. NADELHAFT: Thanks. 20 (Whereupon, the above-referenced document 21 was marked as Exhibit No. 8.) 22 (Document displayed.)
74	1 A That she was, "not strong"? I felt that 2 – she didn't know how to protect herself in terms 3 of setting good boundaries, and, in terms of 4 knowing, you know, the kinds of things that I 5 think a person should be entitled to in a healthy 6 relationship, which was encouragement and belief 7 and trust. And those were the things that I 8 wanted her to get stronger with and feel that she 9 could – she could trust herself and – and her 10 feelings in a way that – that she wasn't able to 11 at that point in time. 12 MR. NADELHAFT: And, Dr. Cowan, we've been 13 going for over an hour now. Why don't we take a 14 short break. Ten minutes? 15 THE WITNESS: Okay. 16 THE VIDEOGRAPHER: Off the record at 1345. 17 (A recess was taken.) 18 THE VIDEOGRAPHER: We are back on the 19 record at 1400. 20 BY MR. NADELHAFT: 21 Q Dr. Cowan, welcome back after a short 22 break. You had mentioned right before we got off	76	1 BY MR. NADELHAFT: 2 Q And, Dr. Cowan, I'm showing you what's 3 been marked as 8, Exhibit 8, and these are your 4 notes from Amber's file, correct? 5 A Yeah. I can't see the – it's August 20th 6 [sic], but what's the date? 7 Q Yeah, this is how I got it. It looks 8 like, I believe, it's August 20th -- 9 August 30th, 2014. 10 A Oh, 30th of 2014, okay. 11 Q And these notes, I noticed, were not 12 written on that same sort of psychotherapy 13 progress notes; is there any reason for that? 14 A No. Sometimes if I, maybe, wanted to make 15 a longer note, it gave me a little more room; but 16 there wasn't any particular reason to do this. 17 Q Okay. And you wrote, "After tumultuous 18 fighting, Amber did go to London." 19 A Yeah. 20 Q Do you know what that is referring to? 21 MR. PRESIADO: Objection, lacks 22 foundation, calls for speculation.

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20 (77 to 80)

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

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21 (81 to 84)

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

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22 (85 to 88)

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

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1 the marathon breakup fighting, and I feel like
2 just a little more of a break or rest before
3 starting dialogue about things. I just feel like
4 going in with a little more energy and a little
5 less mad will help initiate this process. Can we
6 come see you tomorrow instead, perhaps?"
7 Did you receive that text message?
8 **A Yes, I did.**
9 Q Okay. And did Mr. Depp and Amber come in
10 to a joint session with you?
11 **A Yes, they did.**
12 Q Okay. And what do you remember about that
13 joint session?
14 **A It was -- it was a very difficult session.**
15 (Whereupon, Dr. Curry joined the meeting.)
16 **A The -- the thing that stood out for me was**
17 **Amber was very subdued. This is the first time I**
18 **had had a chance to talk with Johnny directly, and**
19 **to try and understand his perspective on the**
20 **relationship. He was -- he was angry with her.**
21 **It felt very diffuse. It wasn't related to**
22 **anything that he talked about directly, but it had**

90
1 to do with trust, and his sense of, I think, of
2 having been lied to or betrayed for some breach of
3 trust.
4 **He was -- he was very emotional. He was**
5 **having angry, and he terminated the session early.**
6 **He wanted to leave, and she was very upset that he**
7 **wanted to leave and no longer was able to be there**
8 **emotionally, and they left.**
9 Q What was your sense of what Mr. Depp felt
10 that he was lied to about?
11 **A He didn't -- he didn't go into any**
12 **specifics. It was about trust. I remember when**
13 **they were walking out the door, Amber said, you**
14 **know, I want you to believe me, I want you to**
15 **trust me.**
16 **And he said very, you know, in a very**
17 **angry voice, you know, "Well then, fucking earn**
18 **it."**
19 **So I don't know what that meant. That's**
20 **what he said.**
21 Q And did Mr. Depp raise his voice during
22 the joint session?

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1 **A Yes. He was very angry.**
2 Q Would you say that he yelled?
3 **A Yes.**
4 Q Okay. Did he yell at you?
5 **A No, you know, he was just -- he was upset**
6 **and he was angry. I'm used to -- if I see**
7 **couples, yelling is not uncommon. You know,**
8 **people get emotional. And he was emotional. He**
9 **was, you know, he was loud.**
10 Q Do you recall if Mr. Depp went to the
11 bathroom during any time during this session?
12 **A Yes, he did.**
13 Q And do you have any belief as to what
14 Mr. Depp did when he went to the bathroom?
15 **MR. PRESIADO: Objection, lacks**
16 **foundation, calls for speculation.**
17 **A I'm assuming that he rolled a joint. When**
18 **he came out, he had it in his mouth.**
19 Q Okay. So in his session with -- in his
20 session with you, Mr. Depp was smoking a joint?
21 **A No. No. He just had it in his mouth. He**
22 **never lit it.**

92
1 Q Okay.
2 **THE TECHNICIAN: I'd like to note that**
3 **Dr. Shannon Curry just joined in.**
4 **MR. NADELHAFT: Can we -- I'm going to --**
5 **I'm going to object to Dr. Curry being at this**
6 **deposition. We weren't given any notice that she**
7 **was going to be here.**
8 **MR. PRESIADO: She's been disclosed as an**
9 **expert witness, and there's no obligation to give**
10 **notice prior to the deposition.**
11 **MR. NADELHAFT: All right. Well, we note**
12 **our objection that Dr. Curry is here. Anyway --**
13 **MR. PRESIADO: Do you want to be more**
14 **specific, other than just your negative objection?**
15 **MR. NADELHAFT: I -- I'm not sure that she**
16 **has a right, as a nonparty, to be at this -- at**
17 **the deposition, but I don't want to take up time**
18 **with that. You know, I know she was disclosed as**
19 **an expert, but, you know, I'm not sure she has --**
20 **you know, she can read a transcript. I'm not sure**
21 **she has the right to be here at the deposition.**
22 **But I'm not going to take up more time with that.**

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24 (93 to 96)

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

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25 (97 to 100)

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

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26 (101 to 104)

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

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27 (105 to 108)

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

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28 (109 to 112)

109	1 know what? Far more hurtful than her venomous and 2 degrading endless 'educational' ranting, is her 3 hideously and purposefully hurtful tirades and her 4 goddamn shocking treatment of the man she was 5 meant to love above all. Here's the real deal, 6 mate. Her obsession with herself is far more 7 important. She is so fucking ambitious. She's so 8 desperate for success and fame. That's probably 9 why I was acquired, mate. Although she has 10 hammered me with what a sad old man has-been I am, 11 Cowan has done me the most cruel of favors. I'm 12 so very sad. I cut the top of my middle finger 13 off. What should I do? Except, of course, go to 14 a hospital. I'm so embarrassed for jumping into 15 anything with her. Fuck the world. JD."
16 Have you ever seen this text message 17 before? 18 A No, I haven't. 19 Q Okay. So Dr. Kipper never showed it to 20 you? 21 A No. 22 Q Dr. Kipper never talked to you about this	111 1 MR. PRESIADO: Objection, calls for 2 speculation, [indiscernible]. 3 A I just recall Amber -- Amber's description 4 in a kind of a vague but global way, that there 5 was some dispute, which was not uncommon between 6 the two of them, that I think he had been drinking 7 and -- there was some bottle thrown. I don't know 8 who threw it, but Johnny cut his finger, and wrote 9 something on the wall with the blood from his 10 finger, as I recall. And there was some damage to 11 the house. It was a mess. That was my impression 12 of the event from Amber's side. 13 Q And what was your understanding of who did 14 the damage to the house? 15 MR. PRESIADO: Objection, calls for 16 speculation, lacks foundation. 17 A She told me that Johnny had done it. 18 Q And did she talk to you at all about what 19 messages that Mr. Depp wrote on the walls? 20 A I think she did, but I don't recall 21 exactly what they are. I think she -- I think she 22 must have said he wrote something, but I don't
110	1 text message or messages like this from Mr. Depp? 2 A No. 3 Q Did Dr. Kipper ever tell you how Mr. Depp 4 felt about you? 5 A No. 6 Q Does it surprise you, at all, to see how 7 Mr. Depp felt about you? 8 MR. PRESIADO: Objection, vague and 9 ambiguous, calls for speculation, assume facts not 10 in evidence. 11 A I don't quite understand what he means by, 12 "done me the most cruel of favors." 13 But often, you know, the, you know, 14 partners of people I see have -- they attribute 15 feelings to me, you know, particularly if I'm 16 promoting something in a patient that creates 17 change, or encouraging them to set boundaries or 18 encouraging them to be less effective at 19 controlling behavior, that the response, you know, 20 on the other person's part can be anger. 21 Q And what was your understanding of what 22 happened to Mr. Depp's finger in Australia?
112	1 recall what it was. 2 Q Did she tell you anything more that 3 happened to her during the time she was in 4 Australia, when these events occurred with 5 Mr. Depp? 6 A Well, there was a -- the thing that I 7 recall, you know, from that time, was that they 8 had taken the dogs with them, and that, because of 9 how they handled taking the dogs into Australia 10 without permission, it resulted in some serious 11 legal jeopardy for her. 12 Q Do you remember Dr. Kipper talking to you, 13 at all, about what happened with Mr. Depp and/or 14 including his finger? 15 A Well, I remember a couple of conversations 16 I had with him. I think, you know, one was he -- 17 I think he was in the ER with Johnny there in 18 Australia, and another conversation I had with him 19 when they did the surgery, or after the surgery, 20 or around the surgery they did on his finger, when 21 he got back to Los Angeles. 22 Q And when you were in the -- when

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29 (113 to 116)

113	1 Dr. Kipper was in the ER with Mr. Depp, do you 2 recall the conversation -- what Dr. Kipper said? 3 MR. PRESIADO: Objection, calls for 4 speculation. 5 A I don't recall the specifics of that 6 conversation. I just know he was there. 7 Q Okay. And did you -- did you get any 8 impression from Dr. Kipper about the state of 9 Mr. Depp's sobriety? 10 MR. PRESIADO: Same objection. 11 A My impression was that he was -- he was 12 either drunk or had taken some kind of drugs. He 13 was not sober. 14 Q And -- and do you recall any impressions 15 you had about what happened to Mr. Depp when you 16 spoke to Ms. -- Dr. Kipper after the surgery? 17 MR. PRESIADO: Objection, calls for 18 hearsay. 19 A What happened to him after the surgery? 20 Q No, no. What happened to him in 21 Australia. 22 Did you have conversations with Dr. Kipper	115	1 to the bottom of this page, on March 8th, 2015, 2 Amber wrote to you, "I feel so lost. I can't 3 talk. I don't know if I'll ever be able to 4 change." 5 And if we keep going down the page, 6 "Clearly, I can't figure this out. I feel so lost 7 right now." 8 Do you know what Amber was referring to 9 here? 10 MR. PRESIADO: Objection, calls for 11 speculation, lacks foundation. 12 A I'm not sure. I'm assuming it was with 13 regard to her relationship with Johnny, but I 14 don't know the specifics of what she was writing 15 here. 16 Q Okay. And March 8th, is, basically, the 17 day after -- or a few days after what happened to 18 Mr. Depp in Australia, if that gives you anymore 19 -- if that helps you recall what Amber was 20 referring to. 21 A Well, that was a very disturbing event, 22 you know, obviously, for both of them. And she
114	1 about what happened to Mr. Depp in Australia? 2 A I just think the one that I mentioned 3 that, you know, his experience with Johnny in the 4 ER. 5 Q And do -- and just that he was there, with 6 Mr. Depp, in the ER? 7 MR. PRESIADO: Objection, calls for 8 speculation. 9 A Yes, and that it was -- it was difficult, 10 and that I think that his impression was that 11 Johnny was not sober. 12 MR. NADELHAFT: You can take this down. 13 Can we put up Heard 18. 14 (Whereupon, the above-referenced document 15 was marked as Exhibit No. 15.) 16 (Document displayed.) 17 BY MR. NADELHAFT: 18 Q I'm showing you what's been marked as 19 Cowan 15, and these are text messages between you 20 and Amber Heard, correct? 21 A Yes. 22 Q Okay. And if we scroll down a little bit,	116	1 was very depressed about it. 2 Q So Amber was disturbed and depressed after 3 what happened in Australia with Mr. Depp, correct? 4 A Yes. 5 MR. PRESIADO: Objection, lacks personal 6 knowledge, calls for speculation. 7 BY MR. NADELHAFT: 8 Q Your answer was, "Yes"? 9 A "Yes." 10 MR. NADELHAFT: Can we put up Heard 21. 11 (Whereupon, the above-referenced document 12 was marked as Exhibit No. 16.) 13 (Document displayed.) 14 BY MR. NADELHAFT: 15 Q I'm showing you what's been marked as 16 Cowan Exhibit 16, it's an e-mail between you and 17 Dr. Kipper, on March 15, 2015. 18 Do you see that? 19 A Yes. 20 Q Okay. And you received an e-mail from 21 Dr. Kipper that says, "Conn, I sent this letter 22 out to him today after another night of broken

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30 (117 to 120)

117	<p>1 promises to remain sober and compliant. Details 2 are not important, or frankly, any different from 3 the past few weeks. I received his immediate 4 response via text, which acknowledged my position 5 and without a plea for changing behavior. I am 6 feeling sad, incredibly sad, since I did like him, 7 feel like I failed him, and all the neurotic 8 feelings an old Jew is entitled to have and 9 exploit. 10 "I know I did the right thing. I know he 11 was at risk for surgery tomorrow. I also know 12 about my own abandonment feelings and the 13 definition of projected identification (if I'm 14 even close). I did receive your message and will 15 do the comps. It's funny, or sad, depending on 16 how you look at it - the last vacation I had was a 17 year ago for my birthday in Utah, our annual trek 18 with Chanel's cousins and their little kids - and 19 at night I was doing comps on aging books (which I 20 just pulled out of my ski boot bag). Let's make a 21 promise I won't have to do this next year. 22 "Thanks for listening. You're an amazing</p>	119	<p>1 door, but not the latch. I have asked Amber to 2 lay low, stay away, and observe. Only J can 3 decide if he is worth saving. 4 "You went a hundred miles beyond what 5 anyone else would have done. Why don't you take a 6 couple of pounds of your Jewish guilt and bury it 7 in some Utah snow." 8 You wrote that, correct? 9 A I did. 10 Q Okay. And what did you mean, "Somewhere 11 along the line, J will have to face consequences"? 12 A I meant that there are consequences to not 13 being sober. That - and, at some point, you have 14 to deal with that, or - or pay the consequences. 15 And that, maybe, you know, terminating him as a 16 patient would be a wake-up call, that there are 17 those kinds of consequences. 18 Q And where you say, "I have asked Amber to 19 lay low, stay away, and observe," was it your 20 understanding that, at this point, Amber and 21 Mr. Depp were not together, living together? 22 A Yes.</p>
118	<p>1 friend. You don't have a private island, but I'm 2 willing to overlook that." 3 What did you understand Dr. Kipper was 4 referring to regarding the letter he sent? 5 MR. PRESIADO: Objection, calls for 6 speculation, hearsay. 7 A My impression was that, you know, that 8 Dr. Kipper was sad that he sent this letter. He 9 felt like he tried very hard to intervene and help 10 with Johnny's sobriety, and felt that he couldn't 11 play that role anymore, and he was upset about it. 12 Q And did you understand that the letter 13 that Dr. Kipper sent to Mr. Depp was, essentially, 14 terminating Mr. Depp as a patient? 15 A Yes. 16 Q Okay. And you wrote, "David, my friend, 17 you just did the hardest thing. It doesn't matter 18 that it was the right thing, it still hurts. 19 Somewhere along the line, J will have to face 20 consequences. You may very well have provided him 21 an invaluable learning experience. Irrespective, 22 you did the only thing you could do, closed the</p>	120	<p>1 Q Okay. 2 MR. NADELHAFT: We can take that down. 3 Can you put up Heard 22. 4 (Whereupon, the above-referenced document 5 was marked as Exhibit No. 17.) 6 (Document displayed.) 7 BY MR. NADELHAFT: 8 Q Dr. Cowan, I'm showing you what's been 9 marked as Cowan Exhibit 17. These are more of 10 your psychotherapy progress notes with 11 Amber Heard, correct? 12 A Yeah. 13 Q And these are from March 23rd, 2015? 14 A Yes. 15 Q And under, "Mood/Affect," you wrote, "very 16 anxious and distraught," correct? 17 A Yes. 18 Q And do you recall from seeing these notes 19 what Amber presented like to have you write, "very 20 anxious and distraught"? 21 A When she came in, she was very upset. 22 Agitated, worried, depressed, anxious.</p>

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31 (121 to 124)

121	<p>1 Q And these feelings were based on what 2 happened in her relationship with Mr. Depp, 3 correct? 4 A Yes. 5 MR. PRESIADO: Objection, lacks 6 foundation, calls for speculation. 7 A "Yes." 8 Q Okay. And that's based on your assessment 9 of Amber Heard and meeting with Amber Heard, 10 correct? 11 A Yes. 12 Q Okay. And if we go down to the bottom 13 here, that's your highlighting? 14 A Yes. 15 Q Okay. And it says, "Amber and J still 16 separated, but their minimal contact has been 17 civil and calmer." 18 So what are you referring to there? 19 A I'm assuming that they -- whatever contact 20 they had, even though they were separated, that it 21 had been, you know, reasonable. You know, they 22 weren't at war. They had been talking in some way</p>	123	<p>1 A Not specifically, no. 2 Q In general? 3 MR. PRESIADO: Objection, asked and 4 answered, leading. 5 A What I -- what I recall is that, you know, 6 very often, people, in general -- and I don't mean 7 this about Amber and Johnny specifically -- but 8 people, in general, remember different things, 9 particularly if they've been drinking or using 10 drugs. Their recall is -- is different from the 11 other person's recall, and there were, I think 12 with Johnny and Amber, there were certainly 13 different memories of what their disputes were 14 about. 15 MR. NADELHAFT: All right. Let's take 16 this down. 17 Can you put up Heard 23. 18 (Whereupon, the above-referenced document 19 was marked as Exhibit No. 18.) 20 (Document displayed.) 21 BY MR. NADELHAFT: 22 Q And, Dr. Cowan, I'm showing you what's</p>
122	<p>1 or another, and it had been -- it hadn't been 2 filled with conflict. 3 Q And where you have it highlighted, it 4 says, "Amber is still concerned about J's drug 5 usage," correct? 6 A Yes. 7 Q So Amber would talk to you about her 8 concerns about Mr. Depp's using drugs? 9 A Yes. 10 Q In -- in your work as -- in your work, 11 when somebody uses drugs and alcohol to excess, do 12 they ever have blackouts? 13 A Yes. 14 Q Are there times where someone may not 15 remember what they did? 16 A Yes. 17 MR. PRESIADO: Objection, overbroad, and 18 relevance. 19 BY MR. NADELHAFT: 20 Q Do you -- do you recall ever talking to 21 Amber about Mr. Depp not remembering things that 22 he did?</p>	124	<p>1 been marked as Cowan 18. These are more text 2 messages between you and Amber, correct? 3 A Yes. 4 Q Okay. And Amber wrote at the top of this 5 document, "Yeah, talking to Johnny, I drove over 6 to the studio. I told me," -- I think she's 7 referring to him, "everything you said I should. 8 It's going well so far." 9 And you received those text messages, 10 correct? 11 A Yes. 12 Q And you wrote, "So glad to hear. 13 Remember, forgiveness comes from strength, not 14 weakness. Pleased for you." 15 And you wrote that? 16 A Yes, I did. 17 Q And Amber wrote, "Talk went well. I 18 forgave him. He told me it wasn't how it looked. 19 All that. But regardless, I chose to forgive him 20 -- to forgive him. Said certain things can never 21 happen again. It was a good talk. By the way, I 22 really need to get some work done tomorrow a.m.</p>

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32 (125 to 128)

125	1 Can I come see you tomorrow later in the day?" 2 What was your understanding about what 3 Ms. Heard, Amber, was forgiving Mr. Depp for? 4 MR. PRESIADO: Objection, lacks 5 foundation, calls for speculation. 6 A I don't recall exactly what the specifics 7 were. I was assuming something that felt that 8 upsetting to her. Something that felt hurtful for 9 her. 10 Q And this isn't -- these texts are from 11 March 24th, 2015, a few weeks after what occurred 12 in Australia, correct? 13 A Yes. It may have been a broader thing. I 14 know she was upset that -- about the legal 15 jeopardy that she got into. She apparently -- it 16 was my understanding that he suggested taking the 17 dogs, and she filled out all of the documentation, 18 and then -- so all the legal trouble fell on her, 19 so she was angry about that. 20 Q Okay. And you don't -- and, in looking at 21 these text messages, you don't recall what it 22 meant where she said, "He told me it wasn't how it	127	1 (Document displayed.) 2 BY MR. NADELHAFT: 3 Q Dr. Cowan, I'm showing you what's been 4 marked as Cowan 19, and these are more text 5 messages between you and Amber, correct? 6 A Yes. 7 Q Okay. And this text message is from 8 April 10th, 2015, from Amber, and she writes, "I 9 had the best conversation with Johnny. I set 10 myself up to let him to come to me, which is so 11 hard for me, obviously, but, in doing so, he came 12 to me apologizing and begging to not have it be 13 over, et cetera. Having the power in my hands 14 seemed to give him the opportunity to regret what 15 he'd done. Thank you again for helping me so 16 much. I'm headed to LA for a few days. Can I 17 come and see you? On Sunday?" 18 Did you receive this text message from 19 Ms. Heard? 20 A I did, yes. 21 Q And do you know what Amber was referring 22 to here?
126	1 looked. All that?" 2 MR. PRESIADO: Objection, asked and 3 answered, calls for speculation, and lacks 4 foundation. 5 A I don't remember exactly what she was 6 referring to there. 7 Q Okay. And then do you see where she 8 wrote, "Said certain things can never happen 9 again." 10 Does that help refresh your recollection, 11 at all, as to what Ms. Heard was referring to? 12 MR. PRESIADO: Objection, asked and 13 answered, calls for speculation. 14 A I don't -- I don't really recall, no. I 15 don't know what that is, but I'm assuming it's -- 16 you know, how he expressed his anger. You know, 17 the -- the -- the kind of hurtful ways that he was 18 with her. 19 MR. NADELHAFT: Okay. We can take that 20 down, and can you put up Heard 24. 21 (Whereupon, the above-referenced document 22 was marked as Exhibit No. 19.)	128	1 A I don't remember specifically what she was 2 referring to, no. 3 Q Okay. It was another fight between Amber 4 and Mr. Depp? 5 MR. PRESIADO: Objection, lacks 6 foundation, calls for speculation, asked and 7 answered. 8 A I'm assuming so, yes. 9 Q How -- in working with Amber, how would 10 Mr. Depp typically try to reconcile with her? 11 MR. PRESIADO: Objection. 12 BY MR. NADELHAFT: 13 Q What did he do? 14 MR. PRESIADO: Objection, lacks 15 foundation, calls for speculation. 16 A I don't know. I can't recall her talking 17 about how they would make up. I don't -- that was 18 never something that we talked about a lot, that I 19 recall. 20 Q And, as of April 2015, Ms. Heard was still 21 trying to make the relationship with Mr. Depp 22 work, right?

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33 (129 to 132)

129	<p>1 MR. PRESIADO: Objection, calls for 2 speculation, lack of foundation. 3 A Yes. I think she -- I think she still 4 wanted it to work, yes. 5 MR. NADELHAFT: Okay. We can take this 6 down. 7 If you can put up Heard 25. 8 (Whereupon, the above-referenced document 9 was marked as Exhibit No. 20.) 10 (Document displayed.) 11 BY MR. NADELHAFT: 12 Q Dr. Cowan, I'm showing you Cowan 20, which 13 are more text messages between Dr. Kipper and 14 Mr. Depp, and looking at Box 142, at the top, on 15 July 1st, 2015, Mr. Depp wrote to Dr. Kipper, 16 "Sorry, here's my by the way...Cowan should be run 17 out of town in utter shame. He's a fucking sump 18 who has done absolutely nothing but given her the 19 verbosity that she uses ever whenever she feels 20 like she must explain to me the psychology of 21 life. Ludicrous. Yes, sir, Cowan should be shot 22 in places that nobody wants to be shot in. He's a</p>	131	<p>1 MR. PRESIADO: Objection, lack of 2 foundation, calls for speculation. 3 A Did you say "jealousy"? 4 Q Yeah, where, like, he's saying that you're 5 staring at her tits? 6 A I don't even know why he would be saying 7 that. She never dressed in any kind of 8 provocative way when she came to see me. I don't 9 even know where that comes from. 10 Q Okay. And if we go down to Box 146, 11 Mr. Depp writes to Dr. Kipper, "You are a great 12 man and a great friend. As much as I would love 13 to see you, it would be a waste of your time. 14 I've just quite a lot going on with business 15 stuff, my Keith film and some Amber issues. 16 "By the way, I'll try not to be too subtle 17 about this, Cowan should be stripped of his 18 license and to practice his supposed profession. 19 And then, he should be stripped and spray painted 20 whilst handcuffed to a stop sign. He is, at best, 21 a fraudulent irresponsible turd of monumental 22 proportions. I love you, Johnny."</p>
130	<p>1 goddamn charlatan, big time. I'm not gonna 2 continue to pay that fucking yes-man to do nothing 3 but stare at her tits and agree with everything 4 she spews. 5 "Tell him to tell he's leaving the 6 business or something, or I too will become a 7 regular client, whether I am welcome or not. 8 Thanks and so sorry. I lobs g, you?" 9 Have you ever seen this text message 10 before? 11 A No, I haven't. 12 Q Did Dr. Kipper ever show you this text 13 message? 14 A No, he didn't. 15 Q Did you ever talk to Dr. Kipper about how 16 Mr. Depp felt about you? 17 MR. PRESIADO: Objection, asked and 18 answered. 19 A No. 20 Q Okay. In this text message, is this the 21 type of jealousy you understood Mr. Depp had for 22 men who were associated with Ms. with Amber?</p>	132	<p>1 Have you ever seen this text message 2 before? 3 A No, I haven't. 4 Q And Dr. Kipper never showed it to you? 5 A No. 6 Q And you never talked to Dr. Kipper about 7 how Mr. Depp felt about you? 8 A No, I didn't. 9 Q Okay. And did Amber ever tell you about 10 how Mr. Depp felt about you? 11 A No, she didn't. 12 Q Okay. As of this July 5th, 2015, 13 timeframe, and July 1st, do you know of -- is 14 there anything you recall that you were working 15 with Amber that would have led to Mr. Depp texting 16 such messages? 17 A No -- 18 MR. PRESIADO: Objection, calls for 19 speculation, lacks foundation. 20 A -- I don't. 21 Q And if we can go down to 148, Mr. Depp 22 texts Dr. Kipper on July 24th, and writes, "Hey</p>

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34 (133 to 136)

133	<p>1 dear pal, Amber is happy, happy with Cowan. I 2 just don't know what truth he gets, and I don't 3 know what his manners and strengths are. I think 4 she listens to him because, when we argue, she 5 slathers me up in this condescending psychiatric 6 trophy lines like, Your fear is so visibile, What 7 are you scared of? Why are you letting your fear 8 and your ego control your life, et cetera. Hippie 9 shit. Makes me want to rampage against anyone 10 wearing Birkenstocks. Love you large, J." 11 Have you ever seen this text message 12 before? 13 A No. 14 Q Dr. Kipper never showed you this message, 15 correct? 16 A No, he didn't. 17 Q And you never talked to Dr. Kipper about 18 Mr. Depp's feelings about you, correct? 19 A No. 20 Q And then, when you were working with 21 Amber, she was trying to keep her relationship 22 with Mr. Depp working correct?</p>	135	<p>1 Q Dr. Cowan, I'm showing you what's been 2 marked as Cowan Exhibit 21, these are your 3 psychotherapy progress notes for Amber, from 4 July 8th, 2015, correct? 5 A Yes. 6 Q Okay. And if we -- these -- and this 7 document would have been in Amber's file of yours, 8 correct? 9 A Yes. 10 Q And if we move down to the bottom, that's 11 your highlighting there? 12 A Yes. 13 Q And you -- what's written there is, "One 14 chronic issue is J's continued drug abuse"? 15 A Yes. 16 Q And, "This issue is aggravated by 17 moodiness"; is that what it says? 18 A Yes. 19 Q Okay. So as of July of 2015, Amber was 20 still reporting drug abuse by Mr. Depp; is that 21 right? 22 A Yes.</p>
134	<p>1 MR. PRESIADO: Objection, vague, and 2 ambiguous as to time. 3 A Yes. 4 Q And you were giving -- you were providing 5 Amber skills to try to work with Mr. Depp, 6 correct? 7 A That's correct. 8 Q And this text message from Mr. Depp, does 9 it -- from what you see, does it look like Amber 10 is trying to use strategies you provided her? 11 MR. PRESIADO: Objection. 12 A These are certainly not words that I would 13 use. So -- that's obviously, you know, what his 14 take is, that he's seeing some influence from me 15 in their conversation. But these are not lines 16 that I would have given her. 17 MR. NADELHAFT: We can take this down. 18 Can you put up Heard 26. 19 (Whereupon, the above-referenced document 20 was marked as Exhibit No. 21.) 21 (Document displayed.) 22 BY MR. NADELHAFT:</p>	136	<p>1 Q Okay. 2 MR. NADELHAFT: All right. We can take 3 that down. 4 Q Did you ever have any conversations with 5 Amber about her trip with Mr. Depp, to Bangkok? 6 A I know they were in Bangkok, but I don't 7 remember any particular conversation I had with 8 her about their experience there. 9 Q Okay. 10 MR. NADELHAFT: Can we put up Heard 28. 11 (Whereupon, the above-referenced document 12 was marked as Exhibit No. 22.) 13 (Document displayed.) 14 BY MR. NADELHAFT: 15 Q Dr. Cowan, I'm showing you what's been 16 marked as Cowan Exhibit 22. These are more text 17 messages between you and Amber, correct? 18 A Yes. 19 Q And these text messages came from your 20 phone, correct? 21 A I'm assuming so. You know, I occasionally 22 would text her from the computer too, but I'm</p>

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<p>137</p> <p>1 assuming this is a phone text.</p> <p>2 Q So either your phone or your computer,</p> <p>3 correct?</p> <p>4 A Yeah. Yeah.</p> <p>5 Q Okay. And Amber wrote, "On</p> <p>6 August 19th, 2015, it didn't work. The</p> <p>7 conversation went south because he drove it there.</p> <p>8 And no matter how hard I worked to keep calm,</p> <p>9 which I did a good job of externally, (I didn't</p> <p>10 yell or raise my voice or act angry, call names,</p> <p>11 throw insults -- nothing). I didn't engage. I</p> <p>12 didn't take the bait, and, after an hour of</p> <p>13 silence on the couch and him asking me what was</p> <p>14 wrong with me, I just said, 'I want you to be</p> <p>15 happy,' which led to "the" conversation, which</p> <p>16 obviously what the whole thing/nonthing was about,</p> <p>17 and it just didn't work.</p> <p>18 "He kept insinuating things, throwing</p> <p>19 jabs, insults, and when I would calmly say --</p> <p>20 would calmly, yes, calmly, say that I was being</p> <p>21 hurt by some of the things he was saying, Help me</p> <p>22 interpret it differently, it inevitably ended up</p>	<p>139</p> <p>1 important to get your priorities straight. This</p> <p>2 may be a red line for him that crossing will</p> <p>3 jeopardize the marriage. You should be sure that</p> <p>4 putting yourself in the running for the part is</p> <p>5 worth what it may cost you. With Johnny's</p> <p>6 feelings about this, your moving ahead with this</p> <p>7 can only be stressful for you both. Not sure I</p> <p>8 can imagine his coming around, or this being</p> <p>9 sustainable over three years. Seems as if it's</p> <p>10 potential really interesting part, versus</p> <p>11 potential harmony at home. You need to decide</p> <p>12 which is more important, in that the probability</p> <p>13 of having them both seems small. Maybe this is</p> <p>14 one you give to him if you want the marriage.</p> <p>15 Reality is always coming in with a sucker punch</p> <p>16 and forcing choices."</p> <p>17 Do you recall what the issues were with</p> <p>18 Mr. Depp and Amber that led to these text messages</p> <p>19 between you and her?</p> <p>20 A I don't remember the specifics, but I</p> <p>21 think it was with regard to a part that she was</p> <p>22 offered to play in a movie that would take her</p>
<p>138</p> <p>1 being hostility, threats, more insults and D</p> <p>2 defense. I literally put up with it for two</p> <p>3 hours. Didn't crack.</p> <p>4 "Didn't get mad (externally) and nothing</p> <p>5 worked. He was just hostile, angry, mean, and</p> <p>6 insulting. And then walked away to 'go to bed.'</p> <p>7 So now I am pacing in my closet room vibrating and</p> <p>8 crying on what to do or how it could go wrong. I</p> <p>9 didn't give chase or yell or fight or do anything</p> <p>10 I normally give into doing, yet I feel terrible,</p> <p>11 not knowing what to do."</p> <p>12 Did you receive those text messages?</p> <p>13 A I did.</p> <p>14 Q And then she wrote, "I'm so sorry,</p> <p>15 Connell, to text you at 2:00 in the morning. I</p> <p>16 which I could know how to make myself know it's</p> <p>17 going to be okay, but the panic and rage I feel is</p> <p>18 hardly bearable. I don't know how to fix it, and</p> <p>19 my instincts most likely are wrong."</p> <p>20 Did you receive that text message?</p> <p>21 A I did.</p> <p>22 Q And then you wrote. "Amber, very</p>	<p>140</p> <p>1 away from home for extended periods of time, and</p> <p>2 those were the times when -- that, you know,</p> <p>3 caused, great stress and, I think, insecurity on</p> <p>4 Johnny's part, worry on his part of what she was</p> <p>5 going to do, who she was going to be with, and,</p> <p>6 you know, it brought up all of those issues that</p> <p>7 they had.</p> <p>8 And that she needed to make a decision</p> <p>9 about, you know, what was most important. You</p> <p>10 know, to think that she could take that part and</p> <p>11 have it be tolerable in terms of the marriage, I</p> <p>12 thought was not realistic.</p> <p>13 Q Okay. Thank you.</p> <p>14 MR. NADELHAFT: Can we put up Heard 29.</p> <p>15 (Whereupon, the above-referenced document</p> <p>16 was marked as Exhibit No. 23.)</p> <p>17 (Document displayed.)</p> <p>18 BY MR. NADELHAFT:</p> <p>19 Q And, Dr. Cowan, I'm showing you what's</p> <p>20 been marked as Cowan Exhibit 23. These are more</p> <p>21 of your psychotherapy progress notes for</p> <p>22 Amber Heard, correct?</p>

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36 (141 to 144)

141	<p>1 A Yeah.</p> <p>2 Q And this is from October 5th, 2015?</p> <p>3 A Yes.</p> <p>4 Q And for, "Mood/Affect," you wrote,</p> <p>5 "anxious," and, "agitated," for Amber?</p> <p>6 A Yes.</p> <p>7 Q All right. And if we scroll down, you</p> <p>8 wrote, "Amber has gotten JD to agree to see</p> <p>9 someone in couple's therapy. Hope this turns out</p> <p>10 to be helpful to them both."</p> <p>11 So what was your understanding here?</p> <p>12 A That they were going to see someone, as a</p> <p>13 couple, in therapy.</p> <p>14 Q All right. And then you wrote,</p> <p>15 "Relationship continues to limp along in its</p> <p>16 unique toxic way."</p> <p>17 What did you mean by that?</p> <p>18 A That, somehow, they were still together,</p> <p>19 even though they were not happy with one another.</p> <p>20 They were still — you know, the relationship was</p> <p>21 very conflicted and problematic to both of them.</p> <p>22 Q And then you wrote, "Amber sees the level</p>	143	<p>1 with all of their fighting — despite all their</p> <p>2 fighting.</p> <p>3 MR. PRESIADO: [Indiscernible.]</p> <p>4 BY MR. NADELHAFT:</p> <p>5 Q And you wrote, "Will continue to try to</p> <p>6 help us -- help her through this, but have little</p> <p>7 hope this will end well."</p> <p>8 What do you mean by that?</p> <p>9 A I just meant that I thought that the</p> <p>10 relationship was unsustainable. I didn't think</p> <p>11 that the kind of issues that they had were going</p> <p>12 to be resolved. I didn't think that Johnny was</p> <p>13 ever going to trust Amber. I think he was always</p> <p>14 going to be threatened by her. He didn't — he</p> <p>15 had great issues around trust, and they didn't</p> <p>16 seem to be leading to any kind of constructive</p> <p>17 resolution.</p> <p>18 Q Okay. Thank you.</p> <p>19 MR. NADELHAFT: We can take this down, and</p> <p>20 can you put up Heard 30.</p> <p>21 (Whereupon, the above-referenced document</p> <p>22 was marked as Exhibit No. 24.)</p>
142	<p>1 of dysfunction, but remains trapped by all her</p> <p>2 fears."</p> <p>3 What did you mean by that?</p> <p>4 A She had great fears of abandonment, being</p> <p>5 alone. I think she was codependent with Johnny,</p> <p>6 and so you know, she saw how — I think she saw</p> <p>7 progressively — you know, it became clear, as</p> <p>8 time went on, the level of conflict, unresolved</p> <p>9 conflict, that existed in the relationship. But</p> <p>10 she was afraid to end it. She was afraid to leave</p> <p>11 him.</p> <p>12 Q Did she -- did Amber have fears of</p> <p>13 Mr. Depp?</p> <p>14 MR. PRESIADO: Objection, vague and</p> <p>15 ambiguous, calls for speculation, lacks</p> <p>16 foundation.</p> <p>17 A Did she ever have "fears" of him? You</p> <p>18 know, she was — Amber is a very strong woman and</p> <p>19 she didn't seem particularly fearful of him. I</p> <p>20 think she was more afraid of being alone, during</p> <p>21 this time, without him, ending the relationship,</p> <p>22 then she was afraid of being with him, you know,</p>	144	<p>1 (Document displayed.)</p> <p>2 BY MR. NADELHAFT:</p> <p>3 Q Dr. Cowan, I'm showing you what's been</p> <p>4 marked as Cowan Exhibit 24, and those are more</p> <p>5 text messages between you and Amber, correct?</p> <p>6 A Yeah.</p> <p>7 Q And Amber wrote, on October 21st, 2015,</p> <p>8 "Sorry Connell, I'm just now seeing this text.</p> <p>9 All worked out yesterday re that conversation.</p> <p>10 However, he showed his true colors in therapy</p> <p>11 today and stormed out of the office in a big fit</p> <p>12 in similar fashion to what he did at yours."</p> <p>13 You received that text message?</p> <p>14 A Yes.</p> <p>15 Q And you wrote, "Sorry to hear that, Amber.</p> <p>16 Sometimes the only tool someone has is to run.</p> <p>17 Hope he will choose to go back, but you have to be</p> <p>18 prepared for an uneven process. If you want to</p> <p>19 talk before you go, give me a call."</p> <p>20 And you wrote that text message to Amber?</p> <p>21 A I did.</p> <p>22 Q What did you understand happened at the</p>

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37 (145 to 148)

145	<p>1 joint therapy session with Ms. Heard and Mr. Depp?</p> <p>2 MR. PRESIADO: Objection, lacks</p> <p>3 foundation, calls for speculation.</p> <p>4 A Just what she said there, that, for some</p> <p>5 reason or another, that he – he didn't like what</p> <p>6 was being said or the direction that things were</p> <p>7 going in, got upset, and terminated the session,</p> <p>8 you know, and left.</p> <p>9 Q In your therapy session, the joint therapy</p> <p>10 session where Mr. Depp was there, did you try to</p> <p>11 challenge Mr. Depp, at all, on anything?</p> <p>12 A Not that I recall, no. I was trying to</p> <p>13 understand him, listen to him. I wasn't</p> <p>14 challenging. There was nothing, that I recall,</p> <p>15 that I was challenging him about.</p> <p>16 Q And do you recall that Mr. Depp, in your</p> <p>17 joint session, was angry from the beginning of the</p> <p>18 joint session with you and Amber and Mr. Depp?</p> <p>19 A Yes. My impression, my memory, of that</p> <p>20 time is that, when he walked in the door, he was</p> <p>21 angry. So again, reading those text messages he</p> <p>22 sent to Dr. Kipper, I – I – I can see that, you</p>	147	<p>1 Q All right. And you wrote, "Amber sees</p> <p>2 clearly all the built-in difficulties in this</p> <p>3 relationship. As much with her remaining" -- what</p> <p>4 does that say then, "as much with her remain</p> <p>5 fixed"?</p> <p>6 A "His issues with her remain fixed,"</p> <p>7 meaning Johnny's issues of distrust, his</p> <p>8 suspicious, his need to kind of have a controlling</p> <p>9 influence on the choices that she made, seem to be</p> <p>10 the same, his jealousy, you know, feeling</p> <p>11 threatened by her work.</p> <p>12 Q And then you wrote, "Wanting to do</p> <p>13 whatever drugs he chooses to use"?</p> <p>14 A Yes.</p> <p>15 Q And you wrote, "Wanting to spend time at</p> <p>16 the studio doing music with his band, et cetera"?</p> <p>17 A Yeah.</p> <p>18 Q So those issues were there during your</p> <p>19 entire time, in working with Amber, that Mr. Depp</p> <p>20 had, correct?</p> <p>21 A Yes –</p> <p>22 MR. PRESIADO: Objection, lacks</p>
146	<p>1 know, this is something that was ongoing. So</p> <p>2 yeah, he was angry.</p> <p>3 MR. NADELHAFT: All right. Can you put up</p> <p>4 Heard 34, please.</p> <p>5 (Whereupon, the above-referenced document</p> <p>6 was marked as Exhibit No. 25.)</p> <p>7 (Document displayed.)</p> <p>8 BY MR. NADELHAFT:</p> <p>9 Q Dr. Cowan, I'm showing you what's been</p> <p>10 marked as Cowan Exhibit 25. These are more of</p> <p>11 your psychotherapy progress notes for Amber,</p> <p>12 correct?</p> <p>13 A Yes.</p> <p>14 Q And this is from January 13th, 2016; is</p> <p>15 that right?</p> <p>16 A Yes.</p> <p>17 Q And you, for, "Mood/Affect," you wrote,</p> <p>18 "anxious, sad," for Amber?</p> <p>19 A Yes.</p> <p>20 Q And, if we go down, this is your</p> <p>21 highlighting here?</p> <p>22 A Yes.</p>	148	<p>1 foundation, calls for speculation.</p> <p>2 A I don't remember him wanting to spend, you</p> <p>3 know, time at the studio, doing music, being an</p> <p>4 issue, until, you know, later, during this time.</p> <p>5 But everything else, yeah, was pretty much the</p> <p>6 same.</p> <p>7 Q And when he was at his studio doing music,</p> <p>8 it wasn't for an hour or two, correct, it was for</p> <p>9 long periods, it was for days, being away from</p> <p>10 Amber, right?</p> <p>11 MR. PRESIADO: Objection, lacks</p> <p>12 foundation, calls for speculation.</p> <p>13 A From what I recall, it could be for days,</p> <p>14 yeah.</p> <p>15 MR. NADELHAFT: And we can take this down.</p> <p>16 And if we can put up Heard 35.</p> <p>17 (Whereupon, the above-referenced document</p> <p>18 was marked as Exhibit No. 26.)</p> <p>19 (Document displayed.)</p> <p>20 BY MR. NADELHAFT:</p> <p>21 Q And, Dr. Cowan, I'm showing you Cowan</p> <p>22 Exhibit 26. These are more of your psychotherapy</p>

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38 (149 to 152)

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1 progress notes for Amber Heard, correct?
2 **A Yes.**
3 Q And this is from January 30th, 2016,
4 correct?
5 **A Yes.**
6 Q And for, "Mood/Affect," you wrote, "sad,
7 anxious, but coping well"?
8 **A Yes.**
9 Q Okay. And if we move down the page, you
10 wrote -- the last sentence you write, "Clearly,
11 she understands this is an unhealthy
12 relationship," correct?
13 **A Yes.**
14 Q Do you recall what gave you that
15 impression?
16 **A Not specifically. I'm just looking at the**
17 **note here, trying to, you know, understand what I**
18 **was talking about. I just felt that she was**
19 **clear. She -- that they were -- they were apart.**
20 **She was not feeling as anxious and desperate. She**
21 **seemed to be stable. She went to -- I remember**
22 **she talked about going to Palm Springs with a**

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1 **friend of hers. She seemed clear about the**
2 **strengths and the weaknesses of the relationship.**
3 **And, you know, I think it was moving in a**
4 **direction where she felt better able to be on her**
5 **own and take care of herself and less codependent,**
6 **you know, with him. Stronger, in general.**
7 Q Okay. And this was after working with you
8 since August of 2014, correct?
9 **A Yes.**
10 Q Okay.
11 MR. NADELHAFT: And we can take this down.
12 And, then, can you put up Heard 36.
13 (Whereupon, the above-referenced document
14 was marked as Exhibit No. 27.)
15 (Document displayed.)
16 BY MR. NADELHAFT:
17 Q Dr. Cowan, I'm showing you what's been
18 marked as Cowan Exhibit 27. These are more texts
19 messages between you and Amber, correct?
20 **A Yes.**
21 Q And Amber wrote, on May 25th, 2016, "I
22 finally did it. I filed for divorce."

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1 Do you see that?
2 **A Yes.**
3 Q And then you wrote, "Never an easy or
4 pain-free decision. Can't help believe, though,
5 that this was a really healthy one for you. Over
6 time, I don't think you will regret having cut
7 that tie. Thanks for letting me know. If you
8 ever want to talk, I'm around."
9 You wrote that text message to Amber,
10 correct?
11 **A I did.**
12 Q And why did you believe that it was a
13 "healthy" thing for Amber to get a divorce?
14 **A Because I thought that the relationship**
15 **was an unhealthy one for her, that it was toxic,**
16 **that it was unsustainable. It was not -- it was**
17 **not a safe place for, you know, for her to be.**
18 Q And did you believe that Amber was safer
19 once she was divorced from Mr. Depp?
20 **A Yeah. And when I say "safer," I don't**
21 **mean physically safer. I just mean emotionally**
22 **safer. I think she's emotionally safer being, you**

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1 **know, out of that relationship with Mr. Depp.**
2 MR. NADELHAFT: And we can take that down.
3 Can we put up Heard 37.
4 (Whereupon, the above-referenced document
5 was marked as Exhibit No. 28.)
6 (Document displayed.)
7 BY MR. NADELHAFT:
8 Q And, knowing what you know, did you
9 believe that Ms. Heard was physically safer after
10 her divorce from Mr. Depp, then she was when she
11 was in a relationship with him?
12 MR. PRESIADO: Objection, vague and
13 ambiguous, calls for speculation, lacks
14 foundation, misstates previous testimony, assumes
15 facts not in evidence.
16 **A As I said, you know, I know they fought a**
17 **lot, and I thought that she was in a much better**
18 **position, you know, being out of that relationship**
19 **than she was being with him. But when I said**
20 **"safer," I really mean emotionally safer. I mean,**
21 **I never had the feeling that -- I know Johnny, you**
22 **know, she would describe, you know, their fights**

<p>153</p> <p>1 as being, you know, very difficult, and – but I 2 never had the feeling that Johnny intended to hurt 3 her. But I think being away from him, and away 4 from that kind of jealousy and suspicion and 5 distrust, that she was certainly emotionally 6 safer.</p> <p>7 Q And, in December of 2015, Ms. Heard did 8 report to you that Mr. Depp had, "did a number on 9 her," correct?</p> <p>10 A You talking about December of '15?</p> <p>11 Q Correct, yeah.</p> <p>12 A Yeah.</p> <p>13 Q So that was Mr. Depp physically assaulting 14 Amber, correct?</p> <p>15 MR. PRESIADO: Objection, lacks 16 foundation, misstates testimony, assumes facts not 17 in evidence, calls for speculation.</p> <p>18 A I don't – you know, to me, "assault" has 19 some kind of legal definition. I know they had a 20 fight. I know what she texted me, that it got 21 physical. I don't know exactly what happened.</p> <p>22 Q And you didn't have any reason to not</p>	<p>155</p> <p>1 A I don't recall exactly why.</p> <p>2 Q Okay. And then you write, "Shortly before 3 the news broke, she texted me that she finally 4 filed for divorce. From very early on, Amber has 5 known this to be an unsafe and unhealthy 6 relationship."</p> <p>7 You wrote that, correct?</p> <p>8 A Yes.</p> <p>9 Q And it was your belief that this 10 relationship Amber had with Mr. Depp was unsafe 11 and unhealthy, correct?</p> <p>12 A That was my impression, yes.</p> <p>13 Q And then you wrote this, "This final break 14 has been a long time coming."</p> <p>15 A Yes.</p> <p>16 Q And then you wrote, "During these months 17 that Amber has been in therapy, we have picked 18 through the permanent and stationary unhealthy 19 elements in her relationship with Johnny Depp," 20 correct?</p> <p>21 A Yes.</p> <p>22 Q "His controlling nature, jealousy, and</p>
<p>154</p> <p>1 trust what she -- what Amber said, correct?</p> <p>2 A No, I didn't have any reason to not 3 believe her.</p> <p>4 Q Okay. Showing you what's been marked as 5 Exhibit Cowan 28, these are your notes from 6 June 7th, 2016; is that right?</p> <p>7 A That's correct.</p> <p>8 Q Okay. And do you know the reason you 9 wrote these notes?</p> <p>10 A I think just that it – it was a little 11 bit more space than I had on those process notes. 12 There's very little space for commentary or – so 13 I'm assuming I just wrote this because it had a 14 little more space.</p> <p>15 Q Okay. If we go down the -- you write 16 here, "I haven't seen Amber since March 16th," 17 correct?</p> <p>18 A Yeah.</p> <p>19 Q So you wrote these notes in June. Do you 20 have any understanding why, not seeing Amber since 21 March of 2016, and you were writing these notes 22 now?</p>	<p>156</p> <p>1 suspiciousness, addiction to drugs and alcohol, 2 and violent and indulgent tempered."</p> <p>3 Did you write that?</p> <p>4 A I did.</p> <p>5 Q Okay. And that's what you were working 6 with Amber about through your sessions with her, 7 correct?</p> <p>8 A Yes.</p> <p>9 Q "Her finally acknowledging the toxicity is 10 a healthy move on her part, despite all the storm 11 and," and what is that word?</p> <p>12 A Oh, "strum and drum." You know, the chaos 13 and anxiety that goes along with, you know, 14 actually filing for divorce.</p> <p>15 Q So this was, "a healthy move," despite the 16 "strum and drum," that accompanied her filing for 17 divorce, meaning that this was out there for the 18 world to see, correct?</p> <p>19 A Yes.</p> <p>20 Q Okay. And if we could keep going down. 21 This is your highlighting, correct?</p> <p>22 A Yeah.</p>

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40 (157 to 160)

157	<p>1 Q And then you write, "I'm not convinced</p> <p>2 Amber realizes how much she is in need of seeing</p> <p>3 treatment" --</p> <p>4 A Being in treatment.</p> <p>5 Q -- "being in treatment. Her call to me</p> <p>6 only followed her meeting with Dr. Kipper. Kipper</p> <p>7 called me and indicated he would terminate his</p> <p>8 treatment of Amber unless she was involved in</p> <p>9 therapy."</p> <p>10 Do you recall having a discussion with</p> <p>11 Dr. Kipper about that?</p> <p>12 A I must have had a call with him, but I</p> <p>13 don't remember the call specifically.</p> <p>14 Q And do you recall if Dr. Kipper continued</p> <p>15 to be Amber's doctor?</p> <p>16 A I don't know whether he did or not.</p> <p>17 Q And then, if we go down the page a little</p> <p>18 bit, you said, "Amber arrived today surrounded by</p> <p>19 an entourage of paparazzi," correct?</p> <p>20 A Yes.</p> <p>21 Q And there was media about her seeing you,</p> <p>22 correct?</p>	159	<p>1 A Yes.</p> <p>2 Q And you wrote, "She is surrounded by a</p> <p>3 number of lawyers and is faced with making some</p> <p>4 serious decisions, i.e., does she opt to file</p> <p>5 domestic violence complaint against JD. She feels</p> <p>6 damaged by the" --</p> <p>7 MR. NADELHAFT: Keep going down.</p> <p>8 Q -- "by the stories spun by the media, JD</p> <p>9 victimized by cold gold digger."</p> <p>10 Do you see that?</p> <p>11 A I do.</p> <p>12 Q So did you have a suspicion that Amber may</p> <p>13 be filing a domestic violence complaint against</p> <p>14 Mr. Depp?</p> <p>15 A I'm assuming that when mentioned -- she</p> <p>16 must have mentioned that.</p> <p>17 Q And -- okay. And did you say anything,</p> <p>18 one way or another, as whether she should or she</p> <p>19 shouldn't?</p> <p>20 A I don't recall -- I don't recall saying</p> <p>21 anything one way or the other. It was -- I think</p> <p>22 she was just talking to me about, you know, these</p>
158	<p>1 A Yes.</p> <p>2 Q Did you read any of that media?</p> <p>3 A No.</p> <p>4 Q Okay. And then -- and then you write,</p> <p>5 "subsequent to our session, I have received calls</p> <p>6 from the media."</p> <p>7 Do you see that?</p> <p>8 A Yes.</p> <p>9 Q And you wrote, "I have not returned, or</p> <p>10 have any -- nor have intent to," correct?</p> <p>11 A That's correct.</p> <p>12 Q And you didn't return any calls to the</p> <p>13 media about Amber, correct?</p> <p>14 A No. That's correct, yeah.</p> <p>15 Q Right. And you wrote, "Amber is now in</p> <p>16 full crisis mode, and has not yet had the</p> <p>17 emotional space to focus on what has happened,"</p> <p>18 correct?</p> <p>19 A "Process."</p> <p>20 Q "Process what has happened," I'm sorry.</p> <p>21 A Yes.</p> <p>22 Q And you wrote that, correct?</p>	160	<p>1 were things that had come out with her lawyers.</p> <p>2 Q Okay. And you didn't -- you didn't</p> <p>3 discourage Amber from filing the domestic violence</p> <p>4 complaint against Mr. Depp, correct?</p> <p>5 A No, I don't think I advised her one way or</p> <p>6 the other.</p> <p>7 Q Okay.</p> <p>8 MR. NADELHAFT: All right. We can take</p> <p>9 this down.</p> <p>10 And can you put up Heard 38.</p> <p>11 (Whereupon, the above-referenced document</p> <p>12 was marked as Exhibit No. 29.)</p> <p>13 BY MR. NADELHAFT:</p> <p>14 Q Dr. Cowan, I'm showing you what's been</p> <p>15 marked as Cowan 29. Did you ever have an</p> <p>16 understanding that Amber Heard wrote an op-ed</p> <p>17 piece in the Washington Post?</p> <p>18 A At some point, I was aware that she did,</p> <p>19 yes.</p> <p>20 Q Do you recall if you read the op-ed?</p> <p>21 A I don't recall reading it. I know that --</p> <p>22 I just remember that she wrote one.</p>

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41 (161 to 164)

161	<p>1 Q Okay. Did you talk to anybody about 2 Amber's op-ed that she wrote in the Washington 3 Post? 4 A No, I don't think so. 5 Q Okay. Did the op-ed -- did Amber's op-ed 6 change your opinion of Mr. Depp in any way? 7 A I don't remember the specifics of -- I 8 don't even know whether I read the op-ed. If I 9 did, it was, you know, a long time ago, so I don't 10 remember the specifics of what was said. 11 Q Okay. And you had no discussions with 12 anybody about this op-ed, correct? 13 A Not that I recall. I may have spoken to 14 Dr. Kipper about it, but I don't recall that, 15 specifically. 16 Q Okay. Do you remember Dr. Kipper saying 17 anything about the op-ed that Amber wrote? 18 A No. 19 Q Okay. Before, you talked about speaking 20 with a doctor for Amber, and you did that months 21 ago; do you recall that? 22 A About what?</p>	163	<p>1 think we probably would take a break, I'm 2 assuming; but I'm going to stop for right now. I 3 appreciate your time. 4 MR. PRESIADO: Yeah, if we can take an 5 hour break. What time is it? It's 12:45, so 6 1:45? 7 THE WITNESS: Okay. 8 MR. NADELHAFT: Okay. 9 MR. PRESIADO: Thank you. 10 THE VIDEOGRAPHER: Off the record at 1543. 11 (A lunch recess was taken.) 12 THE VIDEOGRAPHER: We are back on the 13 record at 1644. 14 EXAMINATION 15 BY MR. LEO PRESIADO: 16 Q Hello, Dr. Cowan. Again, my name is 17 Leo Presiado, and I represent Mr. Depp. I'm going 18 to ask you questions as well. 19 A Okay. 20 Q First, I want to asked to ask you about 21 the highlights that appeared on many of the 22 documents that were shown to you earlier today.</p>
162	<p>1 Q Talking to a doctor about Amber and 2 Mr. Depp and their relationship? 3 A About Dr. Kipper? 4 Q No, no. That you spoke to Dr. Dawn Hughes 5 about -- 6 A Oh, oh. Yes. I got a call. I do 7 remember that conversation, yes. 8 Q Okay. And would you agree that your 9 conversation with Dr. Hughes was consistent with 10 what you've testified to today? 11 A Yeah. 12 MR. PRESIADO: Objection, vague and 13 ambiguous. 14 BY MR. NADELHAFT: 15 Q And would you agree that what you told 16 Dr. Hughes was truthful? 17 A Yes. 18 Q And you're not -- and you've not spoken to 19 Dr. Curry or anybody on Mr. Depp's team, correct? 20 A That's correct. 21 MR. NADELHAFT: All right. Thank you for 22 right now. We've split the deposition time, so I</p>	164	<p>1 Are you sure that you made those 2 highlights? 3 A Yes, I made those highlights. 4 Q Okay. Because the documents we received, 5 that you produced, didn't have any highlights at 6 all. 7 A Oh, really? 8 MR. NADELHAFT: Objection, form. 9 A I just assumed that they were my 10 highlights. I have the originals here, would you 11 like me to take a minute and go get them? 12 Q Actually, that would be great, just to 13 clear this up. 14 A All right. 15 MR. PRESIADO: Why don't we go off the 16 record for a couple of minutes. 17 THE VIDEOGRAPHER: We are going off the 18 record at 1645. 19 (A recess was taken.) 20 THE VIDEOGRAPHER: We are back on the 21 record at 1647. 22 THE WITNESS: I assumed that those were my</p>

<p>165</p> <p>1 highlights, that I had gone back and just had 2 highlighted material that I thought was relevant, 3 but when I look at the originals, there are no 4 highlights. 5 BY MR. PRESIADO: 6 Q Okay. Thank you for doing that. That 7 makes sense now. 8 MR. PRESIADO: Also, I'd like to 9 reiterate, for the record, my previous objection 10 to all the questioning by opposing counsel, with 11 respect to all of those documents to the extent 12 they contain highlights, which were not original 13 to the documents, giving the impression, to the 14 deponent, that they were, in fact, original to the 15 documents, which may have resulted in different 16 testimony, had he understood that these were not, 17 in fact, his highlights. Okay. 18 BY MR. PRESIADO: 19 Q Dr. Cowan, I just wanted to ask a few more 20 questions about your educational background. I 21 won't get too deep into this. 22 Where did you attend college?</p>	<p>167</p> <p>1 Q Understood. So no predoctoral internship. 2 You had postdoctoral training? 3 A Well, the internship was -- my last year 4 of the Ph.D. program was the internship. 5 Q Okay. Understood. Okay. Okay. 6 So I guess that could be considered a 7 predoctoral internship, as you did it prior to 8 actually obtaining your degree; but that was at 9 University of Houston? 10 A Well, internship was at Baylor University 11 school of medicine. It was through Baylor; but I 12 got the Ph.D. from the University of Houston. 13 Q Okay. And was there a particular focus of 14 your training while you were at Baylor? 15 A No, that was the internship. You know, so 16 I rotated through a number of different services 17 during that year. 18 Q Okay. And was there a particular focus 19 with respect to your Ph.D.? 20 A Well, it was in doing individual 21 psychotherapy. 22 Q Okay. And have you authored any</p>
<p>166</p> <p>1 A I went to the University of Houston and 2 got my Ph.D. there, interned at Baylor University 3 school of medicine, and then I came to Los Angeles 4 and did a postdoctoral fellowship at Cedar Sinai. 5 Q Okay. And was your undergrad at Houston, 6 as well? 7 A No, I went to Occidental College, in 8 Los Angeles. 9 Q Okay. And what was your major? 10 A Psychology. 11 Q Okay. And then straight from there to 12 University of Houston, to get your Ph.D.? 13 A Yeah, basically, yeah. 14 Q Okay. And did you -- did you participate 15 in a predoctoral internship? 16 A Well, the internship was, you know, after 17 I had a Ph.D. 18 Q Okay. 19 A This is at Baylor, and then after I got 20 the degree, and, following the internship, I came 21 out to Los Angeles and did a postdoc at 22 Cedar Sinai.</p>	<p>168</p> <p>1 peer-reviewed publications? 2 A One, you know, a study I did, you know, 3 years ago, I think, during my internship, that was 4 -- that was published, and then my dissertation -- 5 but that was never published -- I mean, in that 6 form. 7 Q But with respect to peer-reviewed 8 publications, if you did do one, it would have 9 been decades ago? 10 A Yes. And it was not in -- it had nothing 11 to do with therapy. 12 Q I see. 13 And do you prescribe medication? 14 A No, I don't. 15 Q And is that because you're not licensed or 16 permitted to do so? 17 A I'm not a physician, I'm a psychologist. 18 Q Okay. And we established when you first 19 started treating Ms. Heard. Prior to meeting 20 Ms. Heard, had you been told anything about her 21 condition? 22 MR. NADELHAFT: Objection, asked and</p>

<p>1 answered.</p> <p>2 A I'm assuming I had a conversation with</p> <p>3 Dr. Kipper about it.</p> <p>4 Q Okay.</p> <p>5 A A phone conversation.</p> <p>6 Q And do you recall what he told you in</p> <p>7 connection with her condition?</p> <p>8 MR. NADELHAFT: Objection, Hearsay.</p> <p>9 A I don't recall the specifics. You know, I</p> <p>10 mean, I've had referrals, you know, from different</p> <p>11 people. I don't remember the specifics of that</p> <p>12 conversation, only that he thought that she should</p> <p>13 be in therapy, and wanted to know if I was</p> <p>14 available.</p> <p>15 Q And, prior to meeting Ms. Heard, did you</p> <p>16 have a general understanding of her needs?</p> <p>17 MR. NADELHAFT: Objection, form, asked and</p> <p>18 answered.</p> <p>19 A I had -- I had a phone conversation with</p> <p>20 her before we met for the first time, but it was</p> <p>21 perfunctory. It was mainly around scheduling an</p> <p>22 appointment.</p>	<p>169</p>	<p>1 refers to the ability, or inability, to control</p> <p>2 and regulate your mood and your emotions.</p> <p>3 Q Okay. And did you come to understand that</p> <p>4 Ms. Heard experienced mood dysregulation -- I'm</p> <p>5 sorry, emotional dysregulation?</p> <p>6 A I think that was something that she</p> <p>7 struggled with, yeah.</p> <p>8 Q And, obviously, you developed an</p> <p>9 understanding that she had a relationship</p> <p>10 conflict; is that right?</p> <p>11 A Yes.</p> <p>12 Q And you mentioned "insecurity." Was it</p> <p>13 your -- did you come to understand that she</p> <p>14 suffered from insecurity?</p> <p>15 MR. NADELHAFT: Objection, assumes facts</p> <p>16 not in evidence.</p> <p>17 A Yes. I think she did suffer from</p> <p>18 insecurity.</p> <p>19 Q And can you explain what you mean by that;</p> <p>20 what "insecurities" did she suffer from?</p> <p>21 A I think her insecurity was in trusting her</p> <p>22 relationship with -- I mean, the manifestation of</p>	<p>171</p>
<p>1 Q And did she indicate to you that she had</p> <p>2 an issue with respect to anxiety?</p> <p>3 MR. NADELHAFT: Objection.</p> <p>4 A She indicated that she was --</p> <p>5 MR. NADELHAFT: Go ahead.</p> <p>6 A She indicated she was anxious, yes.</p> <p>7 Q And did she indicate that the first time</p> <p>8 you met with her?</p> <p>9 A Yes.</p> <p>10 Q And how about mood episodes; did she</p> <p>11 indicate she had mood episodes?</p> <p>12 MR. NADELHAFT: Objection, hearsay.</p> <p>13 A Anxiety, and, you know, mood episodes, you</p> <p>14 know, are very often things that people feel</p> <p>15 alternatively. I think she had periods of sadness</p> <p>16 and -- I didn't see her as clinically depressed.</p> <p>17 I saw her as more anxious.</p> <p>18 Q Have you ever heard the term "emotional</p> <p>19 dysregulation"?</p> <p>20 A Yeah.</p> <p>21 Q What does that mean?</p> <p>22 A Emotional dysregulation is -- really</p>	<p>170</p>	<p>1 it was her trusting her relationship, feeling safe</p> <p>2 with Johnny, that he cared about her, that she was</p> <p>3 enough, that she was what he wanted in a person,</p> <p>4 in a partner. Those kinds of personal</p> <p>5 insecurities that people have.</p> <p>6 Q And her -- her personal insecurities were</p> <p>7 as deep-seated as Mr. Depp's, correct?</p> <p>8 MR. NADELHAFT: Objection.</p> <p>9 BY MR. PRESIADO:</p> <p>10 Q Based on your experience with the two of</p> <p>11 them?</p> <p>12 MR. NADELHAFT: Objection.</p> <p>13 A Well, my experience -- my experience with</p> <p>14 Johnny was just the one time that I saw him, so I</p> <p>15 can't really comment on him.</p> <p>16 But my experience with Amber was that -- I</p> <p>17 mean, she came from a very dysfunctional kind of</p> <p>18 home. You know, one with an abusive father, and I</p> <p>19 think the mother and father were -- both used</p> <p>20 drugs. She left home very early to get away from</p> <p>21 a -- a toxic dysfunctional kind of situation at</p> <p>22 home. Came to Los Angeles ultimately, and there</p>	<p>172</p>

<p>173</p> <p>1 was damage from that kind of upbringing. 2 Q It sounds like you would agree with me 3 that her insecurities were deep-seated? 4 MR. NADELHAFT: Objection. 5 A What? 6 Q Deep-seated insecurities? 7 MR. NADELHAFT: Objection, form, 8 foundation, speculation. 9 BY MR. PRESIADO: 10 Q Is that a fair characterization? 11 MR. NADELHAFT: Same objections. 12 A I think that's a fair characterization, 13 yes. 14 Q Okay. Now, you mentioned issues she had 15 in her past with respect to her home life, and, in 16 particular, her father. 17 What did she tell you, specifically, with 18 respect to her father? 19 MR. NADELHAFT: Objection, hearsay. 20 A As I recall, she told me that he had been 21 physically abusive with her. 22 Q And can you give me any sort of examples?</p>	<p>175</p> <p>1 A Yes, the way she described it was – it 2 gave me the distinct impression that this was 3 something that had occurred over a period of time. 4 Q Okay. 5 A And that was destructive and detrimental 6 to her. 7 Q Okay. And by a "period of time," you mean 8 over a number of years? 9 A My assumption it was a number of years, 10 yes; that it wasn't a one-time event. I don't 11 know what the frequency was. 12 Q So your understanding was – your 13 impression was she was physically abused by her 14 father for a number of years during her youth; is 15 that correct? 16 A My impression is she was physically abused 17 by her father for – over some period of time. I 18 couldn't speculate in terms of how many years or 19 what that duration was. 20 Q But it was long enough to cause her 21 psychological harm? 22 A Yeah. I think that kind of situation</p>
<p>174</p> <p>1 MR. NADELHAFT: Objection, hearsay. 2 A I don't recall specific examples, other 3 than that it was, you know, that he was abusive, 4 that he would get angry, and sometimes physical 5 with her. 6 Q Okay. Did she ever describe to you any 7 particular physical abuse perpetrated by her 8 father on her? 9 MR. NADELHAFT: Objection, hearsay. 10 A I don't recall any specific— 11 Q Okay. 12 A – story, no. 13 Q Do you recall any details, at all, with 14 respect to that abuse, other than her relating 15 that to you? 16 MR. NADELHAFT: Objection, hearsay. 17 A No. 18 Q Would the extent of that abuse have been 19 something you would have wanted to know in 20 connection with your treatment of her? 21 MR. NADELHAFT: Objection, form and 22 speculation.</p>	<p>176</p> <p>1 always causes psychological harm, yes. 2 Q You mentioned other problems in her home 3 life in her youth. Well, let me close the loop 4 with respect to her father's abuse. 5 Did she ever indicate to you that her 6 father had sexually abused her? 7 MR. NADELHAFT: Objection, hearsay. 8 A Not that I recall. 9 Q Did you ever form an understanding or 10 impression that that was the case? 11 A No, my impression was that it was more 12 physical abuse, not sexual abuse. 13 Q Is that something you would have, 14 specifically, asked her? 15 A It is something I would have asked her. I 16 don't recall her telling me that she was ever 17 sexually abused by her father. 18 Q Did she ever indicate to you that she was 19 sexually abused in her life at all? 20 A Not that I recall, no. 21 Q And that includes her adolescence, and all 22 the way up to when you stopped treating her?</p>

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<p>177</p> <p>1 A Yes.</p> <p>2 Q Okay. So if you never -- she never told</p> <p>3 you that she had been sexually abused by anyone;</p> <p>4 is that correct?</p> <p>5 A Not to my recollection, no.</p> <p>6 Q Okay. And she never told you that she had</p> <p>7 been sexually abused by Mr. Depp, correct?</p> <p>8 A No.</p> <p>9 Q That's correct?</p> <p>10 A That's correct.</p> <p>11 Q Okay. Now, back to her youth, you</p> <p>12 indicated she had a difficult home life. We've</p> <p>13 talked about her abusive father.</p> <p>14 Was her mother abusive?</p> <p>15 A No, my impression was that her mother</p> <p>16 wasn't abusive, but her mother had drug problems,</p> <p>17 and when someone had drug problems, they're really</p> <p>18 not emotionally available. She felt very</p> <p>19 protective of her mother, and I know provided</p> <p>20 support to both of them, her mother and her</p> <p>21 father.</p> <p>22 Her mother -- my impression of her mother</p>	<p>179</p> <p>1 MR. NADELHAFT: Objection, form,</p> <p>2 speculation.</p> <p>3 A Well, not "trauma," but I think she saw</p> <p>4 her mother as a kind of as a vulnerable, weak</p> <p>5 person, and that made a profound impression on a</p> <p>6 child; and I think she didn't want to be that</p> <p>7 vulnerable, weak person.</p> <p>8 Q Okay.</p> <p>9 A So there was that kind of mark.</p> <p>10 I don't whether you call that "trauma" or</p> <p>11 not, but it certainly influences, you know, how</p> <p>12 someone sees themselves; and, you know, I think</p> <p>13 kids all want to see their parents as kind of</p> <p>14 functional and strong and decisive and living kind</p> <p>15 of constructive healthy lives, and she didn't have</p> <p>16 that as a child growing up.</p> <p>17 Q And not having that and having both of her</p> <p>18 parents being drug abusers, what long-lasting</p> <p>19 impact do you believe that had on her mentally?</p> <p>20 MR. NADELHAFT: Objection, form,</p> <p>21 speculation.</p> <p>22 A I think it made her see the effect of drug</p>
<p>178</p> <p>1 was that she was a person who was anxious and</p> <p>2 depressed and not able to exert much of an</p> <p>3 influence on the family life. That the father was</p> <p>4 the more dominant, you know, partner, and that</p> <p>5 they both used drugs to regulate their emotions.</p> <p>6 Q And by "both," you're referring to her</p> <p>7 mother and her father?</p> <p>8 A Her mother and her father. It was my</p> <p>9 impression, from Amber, they both were involved</p> <p>10 with drugs.</p> <p>11 Q Did you form the impression that her</p> <p>12 mothers's drug use resulted in a psychological</p> <p>13 injury to Ms. Heard?</p> <p>14 A To Amber, or to herself?</p> <p>15 Q To Amber.</p> <p>16 A No.</p> <p>17 MR. NADELHAFT: Objection, form,</p> <p>18 speculation.</p> <p>19 BY MR. PRESIADO:</p> <p>20 Q Did you form the impression that anything</p> <p>21 with respect to her relationship to her mother</p> <p>22 caused Ms. Heard psychological trauma?</p>	<p>180</p> <p>1 abuse, the kind of destructive element that it</p> <p>2 plays in a person's life, and it made her fearful</p> <p>3 of it.</p> <p>4 Q Did it have an effect on her self-esteem?</p> <p>5 MR. NADELHAFT: Objection, speculation.</p> <p>6 A I don't think their drug abuse had any</p> <p>7 effect on her self-esteem, other than the fact</p> <p>8 that, you know, when you have parents who are</p> <p>9 abusing drugs, you know, as a child, you don't</p> <p>10 feel comfortable bring other people home and</p> <p>11 exposing them to that. So it becomes a source of</p> <p>12 shame and embarrassment and that sort of thing.</p> <p>13 Q And did you form an impression on how that</p> <p>14 experience affected her ability to maintain</p> <p>15 relationships as an adult?</p> <p>16 MR. NADELHAFT: Objection, speculation,</p> <p>17 form.</p> <p>18 A My impression was her parents' drug abuse</p> <p>19 wasn't the -- wasn't the issue. It was -- it was</p> <p>20 growing up, I think, with a very insecure</p> <p>21 foundation, and the kind of chronic anxiety that</p> <p>22 that produces, and the distrust that that</p>

<p>181</p> <p>1 produces, the lack of safety, the fear of 2 abandonment that that produces, and all those 3 things influenced the kind of quality of the 4 relationship that people form later on. 5 Q Now, we talked about her father's physical 6 abuse, and her parent's drug abuse, and the 7 general dysfunction in that regard. 8 Did you learn anything else about her 9 childhood that negatively impacted her psychology 10 as an adult? 11 MR. NADELHAFT: Objection, hearsay. 12 A No. The primary thing was, you know, her 13 relationship with, you know, with her parents. I 14 think it left Amber feeling that the only way to 15 be safe in the world, you know, was to get strong 16 and reliant on herself. And she -- I think she 17 worked very hard at trying to do that. And it 18 left her in a position of feeling -- you know, 19 when you -- when you have parents that don't take 20 care of themselves, that are using drugs to 21 modulate, you know, feeling okay in the world, it 22 makes kids protective of those people.</p>	<p>183</p> <p>1 destructive. 2 And my assessment of her, of Amber, was 3 that she was anxious, she was depressed, she was 4 -- had great insecurities in this relationship 5 with Johnny, but that I didn't feel she was 6 suicidal. 7 Q At any point in time, did you get that 8 impression, even if it was just on an occasion? 9 A No, she never impressed me as suicidal. 10 You know, if she was angry, she was hurt, she was 11 feeling vulnerable, she was a lot of different 12 things, but I never saw her as suicidal. 13 Q Did you ever assess Ms. Heard for the risk 14 factor of homicidal ideation or intent? 15 A Not in any specific way, but I never heard 16 her say anything that would indicate that she was 17 feeling that way. 18 Q Did you assess her for high-risk 19 behaviors? 20 MR. NADELHAFT: Objection, vague. 21 A Are you talking about drugs? 22 Q Well, how would you characterize the</p>
<p>182</p> <p>1 And I think it left that kind of mark on 2 Amber. I mean, she related to her family, 3 including her sister, in a very protective way. 4 Q Did you assess Ms. Heard for any risk 5 factors? 6 MR. NADELHAFT: Objection, vague. 7 A Yes. In a general way, I always kind of 8 do a risk assessment. I didn't feel that she was 9 at risk of, you know, of hurting herself. 10 Q So by "risk factors," did you take that to 11 mean suicidal? 12 A Yes. 13 Q Okay. So what did you do to determine -- 14 or to assess her risk factors in a particular 15 suicidal ideation or intent? 16 A Well, I mean, I knew that, on an ongoing 17 basis, you know, when I see someone, you know, I 18 don't do it specifically each time, but I have -- 19 you know, I have a feeling for how depressed 20 someone is, whether they're expressing suicidal 21 ideation, whether they're -- they seem at risk of 22 doing something impulsive that would be</p>	<p>184</p> <p>1 phrase -- in your business, the phrase, "high-risk 2 behaviors"? 3 A Well, I mean, "high risk," when I hear 4 that, I think of it more in terms of drugs. If 5 it's not suicidal ideation or homicidal, you know, 6 thoughts, it would be -- it would be, you know, 7 around drug use. 8 Q What was your assessment with respect to 9 drug use? 10 A I think Amber had done her own 11 experimentation, you know, over a period of time, 12 but I didn't see that as an issue that she was 13 dealing with personally. 14 Q And what did she tell you, specifically, 15 with respect to drug use, past drug use? 16 MR. NADELHAFT: Objection, hearsay. 17 A Just that she had -- had used drugs in the 18 past. I think cocaine, but it didn't -- it didn't 19 seem to be a current issue, and it was not any 20 part of our discussion and treatment. 21 Q Okay. So as part of your treatment of 22 her, you didn't inquire as to her -- the specifics</p>

<p>185</p> <p>1 of her past drug use; is that correct?</p> <p>2 A Yes. And, as I indicated, I think, she</p> <p>3 had, you know, she had -- she had -- I'm sure</p> <p>4 smoked marijuana, at times, and had used cocaine;</p> <p>5 but that it was not something that was an issue or</p> <p>6 a problem with her.</p> <p>7 Q Did you come to learn whether or not she</p> <p>8 had any previous drug addiction problems?</p> <p>9 A It was not my impression that she was ever</p> <p>10 addicted to drugs, no.</p> <p>11 Q And do you recall specifically asking her</p> <p>12 if that had ever been the case?</p> <p>13 A I don't recall specifically asking her</p> <p>14 that, but in her discussion of it, it never felt</p> <p>15 to me, the way she presented it, that it had been</p> <p>16 something that was an addiction. It felt more</p> <p>17 that she had done it for periods of time, but that</p> <p>18 -- that -- it was certainly not a contemporaneous</p> <p>19 issue for her.</p> <p>20 Q Okay. Did you ever come to learn that, in</p> <p>21 her past, Ms. Heard had had a history of suicide</p> <p>22 attempts?</p>	<p>187</p> <p>1 talking about aren't -- they come up as a result</p> <p>2 of how someone presents themselves, and, you know,</p> <p>3 over a period of time, and this kind of</p> <p>4 information usually comes out over a period of</p> <p>5 time. I didn't have a particular protocol of</p> <p>6 running through all of these specific questions.</p> <p>7 So that -- so that I don't have, you know, those</p> <p>8 kind of answers.</p> <p>9 Q Did you ever come to learn that Ms. Heard</p> <p>10 had, in fact, engaged against -- engaged in</p> <p>11 violence against a partner?</p> <p>12 A No.</p> <p>13 Q Okay. And even after treating her, did</p> <p>14 you ever come to learn that she had, in fact,</p> <p>15 engaged in violence against a partner, a domestic</p> <p>16 partner?</p> <p>17 MR. NADELHAFT: Objection to form,</p> <p>18 hearsay.</p> <p>19 A No.</p> <p>20 Q Would you be surprised to learn that she</p> <p>21 had, in fact, engaged in domestic violence against</p> <p>22 a past partner --</p>
<p>186</p> <p>1 MR. NADELHAFT: Objection, form,</p> <p>2 relevance.</p> <p>3 A No.</p> <p>4 Q Is that something you would have inquired</p> <p>5 about?</p> <p>6 A I'm not sure that I would have inquired</p> <p>7 had I not thought that that pertinent.</p> <p>8 Q Did you ever inquire as to whether she had</p> <p>9 ever been hospitalized in the past with respect to</p> <p>10 suicide or suicide risk?</p> <p>11 A No.</p> <p>12 Q Did you ever inquire as to whether she had</p> <p>13 ever participated in self-harm?</p> <p>14 A I don't think so, no.</p> <p>15 Q Did you ever gain the understanding or</p> <p>16 impression that Ms. Heard had a history of violent</p> <p>17 behavior against others?</p> <p>18 MR. NADELHAFT: Objection.</p> <p>19 A No.</p> <p>20 Q Is that something you would have</p> <p>21 specifically inquired about?</p> <p>22 A Well, these kind of inquiries that you're</p>	<p>188</p> <p>1 MR. NADELHAFT: Objection.</p> <p>2 BY MR. PRESIADO:</p> <p>3 Q -- other than Mr. Depp?</p> <p>4 MR. NADELHAFT: Objection to form.</p> <p>5 A Yes.</p> <p>6 Q Do you recall any occasion in which she --</p> <p>7 in which she described to you or told you about an</p> <p>8 incident in which she had acted violently against</p> <p>9 a third person?</p> <p>10 MR. NADELHAFT: Objection, hearsay.</p> <p>11 A No.</p> <p>12 Q Other than Mr. Depp?</p> <p>13 MR. NADELHAFT: Objection, hearsay.</p> <p>14 A No.</p> <p>15 Q And, as you indicated, you would be</p> <p>16 surprised, in fact, if that did happen; is that</p> <p>17 right?</p> <p>18 A That's right.</p> <p>19 Q How do you assess the truthfulness of your</p> <p>20 patients?</p> <p>21 A Truthfulness is an issue. Distortion is</p> <p>22 an issue. I -- I assess the truthfulness of a</p>

<p>189</p> <p>1 patient, usually, over time, which is -- has to do 2 with consistency, things that I observe that seem 3 discrepant from the facts that they present me. 4 But, in doing therapy, you know, I -- I'm 5 at -- I kind of have to trust a baseline of what 6 they're telling me as their truth and their point 7 of view. You know, with the understanding that 8 all those points of view are unique and somebody 9 else, another family member, may have a very 10 different point of view. 11 But truth is -- it is sometimes, you know, 12 hard to -- it's hard to know what somebody is 13 telling you. You have to kind of assume that 14 there is some veracity in that, but it may not be 15 true. 16 Q Okay. So you're indicating that, 17 typically, it's difficult for to you assess the 18 truthfulness of what has been told to you by your 19 patients; is that accurate? 20 MR. NADELHAFT: Objection, misstates the 21 testimony. 22 A There are patients that I've had who I</p>	<p>191</p> <p>1 MR. NADELHAFT: Objection, misstates the 2 testimony. 3 A Well, you know, I assume when somebody is 4 telling me an event, or telling me, you know, how 5 they feel about an event, which is often what 6 happens, that what they're telling me is the 7 truth. I mean, I can't -- I can't approach those 8 kinds of interactions with patients, you know, 9 with a kind of distrustful, you know, Can you 10 prove what you're saying to be true? 11 I make the assumption, a leap of faith -- 12 and it is a bit of a leap of faith -- that what 13 they're saying is a fair accounting. 14 Q Thank you. 15 And that's how you approached your therapy 16 with Ms. Heard; is that correct? 17 A That's correct. 18 Q You took what she told you at face value 19 and made the assumption that it was truthful? 20 MR. NADELHAFT: Objection, form, misstates 21 testimony. 22 A Yes.</p>
<p>190</p> <p>1 know have lied to me. Most often, those lies come 2 up and are discovered in one way or another, or 3 they will admit that they kind of slanted 4 something. But I have to assume, if somebody 5 tells me a story, that it's their truth. 6 Q Okay. And you mentioned "distortion." 7 What did you mean by that? 8 A Well, a Roshomon effect. You know, you 9 can have everybody in a room witness an event, and 10 people will have different interpretations of what 11 that event was. You know, was it between the 12 lines, you know, what the meaning was, what the 13 words meant. So everybody can come away with 14 slightly different distortions, and those 15 distortions can be a function of wish and fear and 16 assumption and -- or things in their past that 17 influence how they interpret an event. So there 18 are those kinds of distortions. 19 Q Okay. With respect to both truthfulness 20 and distortions, are you saying that it's your 21 practice not to judge the truthfulness of a 22 patient?</p>	<p>192</p> <p>1 Q I didn't hear the answer there. 2 MR. NADELHAFT: Same objection. 3 BY MR. PRESIADO: 4 Q Did you say "yes," Doctor? 5 A I did. 6 Q Okay. Thank you. 7 Did Ms. Heard ever indicate to you that 8 she had been in any physical fights as an 9 adolescent? 10 MR. NADELHAFT: Objection, hearsay. 11 A Not that I recall, no. 12 Q Did you have any discussions with her with 13 respect to bullying, whether she be the victim or 14 perpetrator? 15 A No, not that I recall. 16 Q Is it important for to you know, with 17 respect to your patients, what medications they're 18 on? 19 A Yes, certainly, you know, psychoactive 20 medications, yeah. 21 Q Right. And what was your general 22 impression, during your course of treatment with</p>

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193	1 Ms. Heard, of the medication she was on? 2 A My impression was that she had sleep 3 issues. I know that Dr. Kipper had given her 4 medications for that, and dopaminergic medication 5 as well. 6 Q And what is that second medication you 7 referenced? 8 A I have to look in the different -- it may 9 have been different medications over a period of 10 time. 11 Q I guess my question is: What is the 12 purpose of that type of medication? 13 A The purpose of that kind of medication is 14 to increase the dopamine level. It's medication 15 given, you know, to people who have been diagnosed 16 with bipolar II, usually. 17 Q Did you ever come to learn or understand 18 that Ms. Heard had engaged in high-risk 19 sexual-related activity? 20 MR. NADELHAFT: Objection, vague, form. 21 A I'm not sure what you mean by "high-risk 22 social activities."	195	1 THE TECHNICIAN: Hold on one moment. 2 (Document displayed.) 3 MR. NADELHAFT: I'm sorry, that's not the 4 right document. Why don't you pull up what I sent 5 to you as Exhibit 1, at page 3. 6 THE TECHNICIAN: Sure. One second. 7 Shall I mark this as Heard -- or Cowan 30? 8 MR. PRESIADO: Sorry? 9 THE TECHNICIAN: Shall I mark this as 10 Cowan 30? 11 MR. PRESIADO: The next number in line 12 would be great. 13 (Whereupon, the above-referenced document 14 was marked as Exhibit No. 30.) 15 (Document displayed.) 16 MR. PRESIADO: Yeah, if you could blow 17 that up a little bit, that would be great. 18 BY MR. PRESIADO: 19 Q You recognize this document, Doctor, 20 right? 21 A Yes. 22 Q And is the -- does this indicate the first
194	1 Are you talking about sexual activities? 2 Q I said "sexual." I think you misheard me. 3 A Oh, "sexual activities." 4 MR. NADELHAFT: Same objections. 5 A Meaning what? I don't know what that 6 means. 7 Q Is there such a thing as high-risk sexual 8 activities? 9 MR. NADELHAFT: Objection. 10 BY MR. PRESIADO: 11 Q From an industry point of view? 12 A Well, someone who is promiscuous, you 13 know, not using, you know, discretion and 14 protection, that kind of high risk. That was not 15 my impression that -- nothing that she told me 16 would have suggested that. 17 Q Okay. Do you recall, specifically, 18 inquiring about that? 19 A No. 20 Q Did you -- 21 MR. NADELHAFT: Brennan, if you could pull 22 up what was previously marked as Exhibit 2.	196	1 meeting you had with Ms. Heard? 2 A I believe it was. 3 Q And the meds up top, does that refresh 4 your recollection of the medication she was on? 5 A Yes. 6 Q And what is the first indication? 7 A "Abilify." 8 Q And what is that for? 9 A It is a stimulant, basically. I mean, 10 it's -- it's often given to people with dopamine 11 imbalances. 12 Q Okay. Do you know why she was taking 13 that? 14 A I -- I know that Dr. Kipper had given it 15 to her. I didn't have a discussion with him as to 16 why he had prescribed that; but I'm assuming that 17 he saw her as having a dopamine imbalance, in 18 terms of how she presented herself to him. 19 Q And did you gain an understanding how that 20 dopamine imbalance affected her psychologically? 21 A I think it was the kind of unstable mood 22 that she went through, and it was Dr. Kipper's,

<p>197</p> <p>1 you know, attempt to help regulate mood.</p> <p>2 Q And explain to me her "uneven mood."</p> <p>3 What was your understanding of that?</p> <p>4 A Well, I never saw Amber high or — but she</p> <p>5 had sleep disturbances and high anxiety, and</p> <p>6 moments of feeling very sad and low.</p> <p>7 Q Okay. And many people have mood</p> <p>8 imbalances, but aren't taking medication for it.</p> <p>9 What's your understanding of the type of</p> <p>10 mood imbalances that would require medication?</p> <p>11 MR. NADELHAFT: Objection, speculation.</p> <p>12 A Well, you know, I think, in general,</p> <p>13 people tend to be, in our culture, overmedicated.</p> <p>14 And so the people who take — I mean, from, you</p> <p>15 know, mild antianxiety medications or something,</p> <p>16 you know, like an SSRI, which is on the other</p> <p>17 side, or something on the dopaminergic side, like</p> <p>18 Abilify, I think these thing are all — that tend</p> <p>19 to be overprescribed. So I'm not sure I would —</p> <p>20 I was going to challenge Dr. Kipper's treatment of</p> <p>21 her, but I — I'm not sure that she was</p> <p>22 [indiscernible] patient, but I think it was an</p>	<p>199</p> <p>1 situations, so yes.</p> <p>2 Q And is that last medication, "Melatonin"?</p> <p>3 A Yes.</p> <p>4 Q And that's for the sleep issue?</p> <p>5 A Yes.</p> <p>6 Q Is there any other medication indicated up</p> <p>7 there? I see some other handwriting.</p> <p>8 A No, just Abilify, Neurontin — oh, let me</p> <p>9 — no, I think it was 100 milligrams — or, let's</p> <p>10 see — I think that's, "100 milligrams."</p> <p>11 Q And, during the course of your treatment</p> <p>12 of Ms. Heard, did you come to learn of her taking</p> <p>13 any other medications, other than those listed</p> <p>14 here?</p> <p>15 A I think later on, Dr. Kipper changed her</p> <p>16 medication. I think she was taking Provigil,</p> <p>17 which is a medication given to people that have</p> <p>18 narcolepsy.</p> <p>19 Q Okay. I'm sorry. What is the purpose of</p> <p>20 Provigil again?</p> <p>21 A Narcolepsy. You know, people who have</p> <p>22 sleep disturbances, where they can't sleep at</p>
<p>198</p> <p>1 attempt to attempt to kind of, you know, help her</p> <p>2 regulate her emotional state.</p> <p>3 Q And what are the typical symptoms of</p> <p>4 somebody who is prescribed that medication?</p> <p>5 A Moodiness, agitation, very often anger,</p> <p>6 sadness.</p> <p>7 Q And would it take those emotions -- those</p> <p>8 emotions would have to be chronic before</p> <p>9 medication is prescribed; is that your</p> <p>10 understanding?</p> <p>11 MR. NADELHAFT: Objection, speculation.</p> <p>12 A Yes.</p> <p>13 Q And what's this second medicine indicated?</p> <p>14 A "Neurontin." Yeah, I'm pretty sure</p> <p>15 that's, yes, Neurontin.</p> <p>16 Q And what symptoms require that medication?</p> <p>17 A The, I think, more the agitation.</p> <p>18 Q Okay. And, again, in order to be</p> <p>19 prescribed this medication, that would have to be</p> <p>20 chronic?</p> <p>21 A Yeah. You know, I don't think medication</p> <p>22 is ever prescribed for one-off, you know,</p>	<p>200</p> <p>1 night and they get sleepy during the day.</p> <p>2 Q And is it your understanding that those</p> <p>3 disturbances would have to be pretty severe to be</p> <p>4 prescribed?</p> <p>5 A Yes. Usually — yes. Usually, narcolepsy</p> <p>6 is a very, very specific test for narcolepsy. I</p> <p>7 don't know that — it wasn't my impression that</p> <p>8 Amber had any of those, but that's my impression</p> <p>9 of that. There are tests in a sleep lab that</p> <p>10 result in kind of a definitive diagnosis of</p> <p>11 narcolepsy. I'm sure it's prescribed, you know,</p> <p>12 more frequently, just based on how a patient</p> <p>13 presents, but they would have to be persistent.</p> <p>14 Q And can you read for me what you have</p> <p>15 there under, "Behavioral Functioning."</p> <p>16 A She, "Arrived 20 minutes late, and left</p> <p>17 20 minutes early. Had another appointment</p> <p>18 scheduled. Amber is anxious about her future with</p> <p>19 JD," Johnny. "Insecure. Wants to be wanted</p> <p>20 badly."</p> <p>21 Q Okay. And the first sentence, "Arrived</p> <p>22 20 minutes late and left 20 minutes early," why do</p>

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201	<p>1 you have that under, "Behavioral Functioning"? 2 A No particular -- no particular reason to 3 have it there. It was just kind of a note that I 4 made. You know, it suggests to me, again, someone 5 who is having a difficult time, you know, 6 organizing, planning, their lives, so maybe that 7 is why I put it there. Because, usually, when 8 someone is in therapy, you know, that becomes an 9 important event, you know, for them to take, you 10 know, the full time, and usually they arrive on 11 time and will stay the whole time. So if someone 12 doesn't do that, it kind of causes a red flag. 13 Q And did that raise a red flag for you? 14 A Well, it raised a red flag to me in terms 15 of her ability to organize her time, yes. 16 Q Okay. And did you draw any other 17 impressions from her arriving 20 minutes late and 18 leaving 20 minutes early? 19 A No, just that she was a little scattered, 20 and that -- that was an issue that we had to 21 address. 22 Q And under, "Substance Use," it says,</p>	203	<p>1 THE TECHNICIAN: Yeah, one moment. 2 (Complies.) 3 MR. PRESIADO: Thank you. 4 BY MR. PRESIADO: 5 Q What did you write here, Dr. Cowan, under, 6 "Goals"? 7 A Well, again, you know, I don't mean -- 8 when I write these notes, they're not -- sometimes 9 if I have a little bit more to write, I kind of 10 start in one area and I just write it. So I'm not 11 -- you know, "Goals," and, "Interventions," 12 sometimes tend to get very -- they're not really 13 what I'm talking about. So this is just a note 14 that I mean -- that I wrote. 15 "Went over the need to establish healthy 16 self-soothing," which she didn't have. Had a very 17 difficult time kind of regulating her emotions and 18 calming herself down. 19 Q Let me stop you there for a second, 20 Doctor. What did she indicate to you that gave 21 you that impression? 22 A Just how anxious she was and how</p>
202	<p>1 "occasional alcohol." 2 Did you inquire specifically as to 3 substance use at this first meeting? 4 A I don't recall exactly how this came up, 5 but I must have -- I must have brought it up. I 6 think she told me she had an occasional glass of 7 wine, but it wasn't anything that was regular or 8 out of control. 9 Q And had she indicated any other substance 10 use, you would have put that here, correct? 11 A Yes. 12 Q So with respect to any inquiries, 13 inquiries with respect to her substance use, all 14 she indicated to you was the occasional alcohol? 15 MR. NADELHAFT: Objection, speculation. 16 A Yes. 17 Q Okay. And you took that at face value, 18 correct? 19 A Yes. 20 Q Okay. 21 MR. PRESIADO: Brennan, can you give me 22 control of this document.</p>	204	<p>1 destructive the anxiety was. You know, in terms 2 of spinning at night, difficulty sleeping, you 3 know, just thoughts, worries, that kind of thing. 4 So you know, we worked on trying to get her to do 5 some meditation to, you know, learn some ways of 6 calming herself. She had a difficult time with 7 that. I mean, her relationship with herself was 8 not one that I think she learned as a kid. 9 I mean, as children -- parents, with their 10 own behavior and how they relate to kids, teach 11 them how to calm themselves down. They are 12 encouraging, they're nurturing, they're -- they 13 create perspective, context, they teach kids how 14 to soothe themselves. And she didn't learn that 15 from her parents, so she grew up without knowing 16 how to do that. 17 Q Okay. And with respect to the anxiety 18 issue, was there anything, in particular, that she 19 attributed it to, or you attributed it to, based 20 on your discussions with her? 21 A Nothing that I recall. 22 Q Okay. And, again, your assessment was</p>

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<p>205</p> <p>1 that her anxiety issue was due primarily to her 2 life experience as a kid and as an adolescent 3 through to adulthood; is that accurate? 4 A Yes. But, you know, I see I put, 5 "bipolar II," down. I mean, that's a brain 6 chemistry kind of imbalance, and that I -- I was 7 kind of speculating that this is what's going on. 8 So it was the -- it was the kind of range of mood, 9 the agitation, the anxiety, the depression, and 10 the kind of recycling of those states that made me 11 make that note. 12 Q Okay. And I cut you off before you read 13 the whole thing. Can you again read it to me from 14 -- starting with, "Goals," where it says, "Went 15 over need," through to the indication, the bipolar 16 indication. 17 A Yes. "Went over need to establish healthy 18 self-soothing. Session ended prematurely and that 19 she had a call-back and had traffic concerns, so 20 she left prematurely. Unstable mood. Bipolar 21 II," question mark. 22 Q Okay. Let me ask you about that. </p>	<p>207</p> <p>1 somebody is coming in who is anxious, you know, we 2 work on what are the sources of that anger -- I 3 mean that anxiety, you know, what's the history of 4 it. But whether it's generalized anxiety 5 disorder, or you know -- or panic attacks, the 6 specific diagnosis to me is not very helpful. 7 It's what the symptoms are. 8 Q Okay. And just to be clear, through the 9 entire course of your treatment of Ms. Heard, you 10 never specifically diagnosed her; is that right? 11 A No. 12 Q That's correct? 13 A That's correct. 14 Q Okay. That being the case, during your 15 entire treatment of her, you never assessed her 16 for the purpose of diagnosing her; is that 17 correct? 18 A That's correct. 19 Q And is that typical with respect to your 20 treatment of all of your patients? 21 A Well, when I do a formal diagnosis, it's 22 usually for insurance purposes. You know, in </p>
<p>206</p> <p>1 What did you mean by, "bipolar II," 2 question mark? 3 A That was a question mark to me, is this 4 what's going on. Does she have, you know, is that 5 a -- I mean, bipolar II is kind of a diagnostic 6 antidote that is -- relates to mood, that I was 7 wondering about. You know, in terms of what I 8 just mentioned, you know, the anxiety, the 9 agitation, the spinning, the, you know, her 10 inability to kind of accomplish that. 11 Q But this indication here of "bipolar II," 12 question mark, that's not a diagnosis, correct? 13 A No. 14 Q And, in fact, based on your previous 15 testimony, you never diagnosed her with 16 bipolar II, correct? 17 A Right, but it was a question that I had in 18 my mind. 19 Q In fact, based on your previous testimony, 20 you never diagnosed her at all; is that right? 21 A No. I don't really tend to work from 22 diagnoses. I work from, you know, symptoms. If </p>	<p>208</p> <p>1 order to get insurance to cover part of the 2 session's fees, it may require diagnosis. So you 3 know, I do that; but it's not something that -- I 4 mean, that's the purpose of the diagnosis, is 5 really for that, rather than the diagnosis being 6 something that is in -- specifically important in 7 terms of how I work with people. It's the -- you 8 know, I mean, a diagnosis is simply a kind of 9 aggregate of symptoms. 10 Q Now, I understand that you didn't 11 specifically diagnose Ms. Heard at any time. 12 There was an indication here with respect to 13 bipolar II, and there's a question mark. 14 Did you ever have or obtain any indication 15 with respect to borderline personality in 16 Ms. Heard? 17 A No. 18 Q Okay. But, again, you weren't assessing 19 her for a diagnosis, whether it be bipolar or a 20 borderline personality disorder, correct? 21 A That's correct. 22 Q What are cluster B personality disorders? </p>

<p>209</p> <p>1 A "Cluster B"? 2 Q Yes, "B" as in boy. 3 A I'm not -- I don't know. I'm not familiar 4 with that. 5 Q And it also indicates here, on the bottom 6 of this exhibit, "Will see her tomorrow." 7 Did you, in fact, see her the next day? 8 A I don't know. If I have a note the next 9 day, it would be in the chart. I don't know 10 whether I did or not. 11 Q Okay. 12 A Or whether she, you know, left. She was 13 going out of town. 14 Q This document follows the document we were 15 just looking at. Do you know when this document 16 was prepared? I'm sorry, strike that. 17 Do you know in connection with -- let me 18 just ask you: When was this document prepared, if 19 you can recall? 20 A I don't know when I -- I don't see a date 21 on this. 22 Q Yeah, there isn't a date.</p>	<p>211</p> <p>1 Q Okay. 2 A "Prescribed," I guess, "Adderall." 3 Adderall, again, is a stimulant. "Mood 4 instability," this -- I said, "crashes." I think 5 I meant she goes through these periods of feeling 6 grief and sad and very lonely. 7 Q Okay. And let me interrupt you, 8 Dr. Cowan, as we work through this document, just 9 to make this deposition a little quicker. It 10 says, "Prescribed Adderall." 11 Was it your understanding that she, at 12 that time, had been prescribed that drug? 13 A That's the only reason I would have 14 written it down. 15 Q Do you know what that purpose of Adderall 16 is? 17 A Well, Adderall, as I said, is a stimulant. 18 It's to keep someone, you know, give someone more 19 energy, more focus, it's often used with people 20 who are distractable, attention deficit disorder. 21 That's why it's prescribed. 22 Q And do you know why it was prescribed to</p>
<p>210</p> <p>1 Could this have been from the next day? 2 MR. NADELHAFT: Objection, speculation. 3 A You know, I'm not sure. Yeah, this may 4 have been -- what was the date on the first 5 document? 6 Q August 26th, 2014. 7 Let's do it this way, Dr. Cowan. Let me 8 give you the opportunity to read the entire 9 document and see if that refreshes your 10 recollection. And just ask the document tech, 11 Brennan, when you want him to scroll down, and 12 read it at your leisure. 13 A It looks like Provigil. I can't see rest 14 of it at the top. 15 Q If you can read it out loud, so it's clear 16 for the record. To the extent that you don't 17 understand, or can't read a word, just go ahead 18 and point that out. And if can you go through the 19 entire document, I appreciate that. 20 A "Provigil," I don't know -- it looks like 21 something a day, but I don't know what that second 22 word is.</p>	<p>212</p> <p>1 her, specifically? 2 MR. NADELHAFT: Objection, speculation. 3 A Well, I had it here for mood instability. 4 Adderall is not typically prescribed for mood 5 instability. It's more on attention focus, so I'm 6 not sure. 7 Q Okay. And, again, I think you explained 8 this, but is that word, "crashes"? 9 A Yes. 10 Q And what did you mean by that? 11 A Well, again, obviously, I wrote this down, 12 you know, six or even years ago, so I can only 13 kind of speculate what I meant. But I think of I 14 meant something that she has periods of low 15 energy, and -- you know [indiscernible]. 16 Q Okay. If you can continue reading after, 17 "crashes." 18 A Now, maybe this was -- maybe this was 19 something I took, you know, the notes that I made 20 very early on. So the Adderall might have been 21 when she was in school. I see then I say, "Then 22 used coke at 18." I don't know -- I didn't</p>

<p>213</p> <p>1 indicate for how long. But, apparently, that was 2 her — she told me she had been in the use of 3 cocaine then. 4 Q Okay. So just to -- I missed that. So 5 after the word, "crashes," can you read the next 6 line. 7 A "Then used coke at 18, depressed since 15. 8 Crushing anxiety, was medicated," for it. I don't 9 know what medication she was given, but she 10 indicated she had been given some medication for 11 the anxiety. 12 Q Okay. And, in connection with the 13 reference to, "coke at 18," does that refresh your 14 recollection as to any drug abuse in the past? 15 MR. NADELHAFT: Objection, form. 16 A Well, I see that she did that. I know she 17 had mentioned that she had, you know, had tried — 18 tried using different drugs, but I never was of 19 the impression this was, you know, anything that 20 was lasting and/or a problem. 21 Q Okay. And then it says, "Depression since 22 15."</p>	<p>215</p> <p>1 continue reading under, "alcohol." 2 A "Used to obsess" — I said, "of losing 3 mother," with regard to losing her mother. The, 4 "Age 28," I think refers to Amber. "Has a 27-year 5 old sister, and an older half sister. Mother uses 6 stimulants. Dropped out of high school. Came to 7 LA. Suicidal thought" — I didn't realize I had 8 written that down. 9 Q Let's stop there then. 10 A Okay. 11 Q This refreshes your recollection that she 12 did indicate to you with respect to suicidal 13 thoughts? 14 A Yes. Yeah. 15 Q And having read this, do you recall what 16 the time period is referenced here, whether it was 17 when she was younger, whether it was younger 18 through the present date, does this refresh your 19 recollection in that regard? 20 A I think it was when she was younger. I 21 see, "age 20." I must have asked her when that 22 was. I think she said when she was 20.</p>
<p>214</p> <p>1 Did I read that correctly? 2 A That's correct. "Crushing anxiety, was 3 medicated. Father violent, heroin user, pain 4 killers, alcohol." 5 Q And with respect to the reference to the, 6 "depression since 15," was it your understanding 7 that she was depressed from 15 up through this 8 time period? 9 MR. NADELHAFT: Objection to form. 10 A Yes, that she had — she — it was my 11 impression that she, you know, was depressed on 12 and off, anxious, depressed, you know, since, you 13 know, she was a teenager. 14 Q Okay. I'm sorry, "Father violent." 15 Can you continue reading there, please. 16 A Yes. "Heroin user, pain killers, 17 alcohol." 18 Amber talked about always worried about 19 losing her mother, and, you know, I mean, the 20 anxiety in that household was very, very high. 21 The tension in that household was high. 22 Q Okay. So it says, "alcohol" — if you can</p>	<p>216</p> <p>1 Q Okay. 2 A "Nothing since then." 3 Q Okay. Then the next line? 4 A After, "nothing since then"? 5 Q Yes. 6 A Okay. "Supports family." "Father 7 unemployed," her, "mother works." 8 Q Okay. Let me ask you about that. What 9 did she say -- do you recall anymore specifics 10 about this reference to her supporting her family 11 and her father unemployed? 12 MR. NADELHAFT: Objection, hearsay. 13 A Only that she helps support her family. 14 Her father was not working, her mother had some 15 kind of job. I don't think that it was very high 16 paying, but she had some kind of employment, and 17 that, for some period of time, she had provided 18 them with financial support. 19 Q And did you gain an understanding as to 20 how that fact affected her mental state? 21 A Well, you know, I think it — it affected 22 her in two ways: I mean, in one way, I think she</p>

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217	<p>1 felt burdened by it, worried about their future; 2 and, in another way, I think it made her feel more 3 in control and a sense of being, you know, kind of 4 important to them. That she was able to do that. 5 Q And did you see that as a contributing 6 factor to her anxiety? 7 A I think it was, yeah. It was something 8 that, you know, any actor, you know, works 9 sporadically, and so their, you know, their income 10 is not something like working for the post office, 11 and it was a commitment that she had made. So it 12 was something that she felt she had to keep up. 13 So it was some source of her anxiety. I don't 14 think it was a primary one, but I think it was 15 one, yes. 16 Q And that's what I was going to ask you 17 next: Did you form the impression that it was 18 important to her to keep up the support of her 19 parents? 20 A Yes, I think it was. 21 Q Okay. And that's the financial support, 22 correct?</p>	219	<p>1 she — she didn't feel safe around her father, and 2 so I think this was a way she could have an 3 intimate kind of connection and, I think, feel 4 safe. So from that standpoint, I think it was 5 healthy, and then it kind of — it ran some kind 6 of course. 7 I don't remember exactly why it broke up, 8 but I know that, for a time, this was, you know, 9 an important emotional, stable, kind of connection 10 that anchored her and was helpful to her 11 emotionally. 12 Q And you used the term "girlfriend." 13 Does that denote that her relationship 14 with this girl was a romantic relationship? 15 A Yes. 16 Q Okay. Did you come to learn of any other 17 romantic relationships she had had with a female? 18 A No. This is one that I remember her 19 talking about. It was a, you know, a significant, 20 you know — it was a real relationship that she 21 had with this woman for a number of years. 22 Q And in connection with that relationship,</p>
218	<p>1 A Yes. 2 Q Okay. If you can continue reading with, 3 "Both." 4 A It looks like, "both had girlfriends." I 5 don't know what — I'm not sure what I meant by 6 that. She told me she had had a relationship with 7 a woman for five years. 8 Q Okay. Did she ever tell you the name of 9 that individual? 10 A I'm sure she did. I don't recall what the 11 name is, but I know she did. She told me a little 12 bit about her relationship, and I know that this 13 was someone who was important to her. 14 Q What did she tell you about — now that 15 you've read this, does that refresh your 16 recollection as to that relationship; more 17 specifically, did you perceive that as a healthy 18 relationship? 19 A I — my impression about that 20 relationship, was that it was a kind of a safe 21 haven for her. It was someone that she could 22 connect to and feel safe around. I don't think</p>	220	<p>1 she never indicated to you that she had physically 2 abused that girlfriend? 3 MR. NADELHAFT: Objection, misstates the 4 record, relevance, form. 5 A No, she never indicated that. 6 Q Okay. If that was, in fact, the case, 7 would you have expected her to mention that? 8 MR. NADELHAFT: Objection, hypothetical, 9 misstates the record, form. 10 A Well, you know, here's what happens, you 11 know, people present what they feel safe 12 presenting. They're truthful to what they feel is 13 sometimes in their best interest, so they — you 14 know there are lies of omissions and lies of 15 comission, and sometimes people leave important 16 things out. 17 So I mean, it would be important to have 18 known that, because, you know, that's an important 19 element in a person's life, but it was something 20 that she never made apparent to me. 21 Q And that was my next question. To the 22 extent that was, in fact, the case, it would be</p>

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<p style="text-align: right;">221</p> <p>1 important for to you know that in connection with 2 your treatment of Ms. Heard; is that right? 3 MR. NADELHAFT: Objection, form, 4 hypothetical, misstates the record. 5 A It would be important in terms of how she 6 deals with Amber. I mean, how people deal with -- 7 anger there's probably no more fundamental human 8 emotion than anger, and how we deal with it is of 9 enormous, you know, importance in all areas of our 10 lives, and certainly in intimate relationships. 11 So if someone is physically abusive to 12 someone, yes, that would be important because that 13 would mean they're -- they don't have their -- 14 they're not able to regulate their feelings in a 15 constructive way, and... 16 Q And that would have better helped you 17 understand her relationship with Mr. Depp, 18 correct, had you known that fact? 19 MR. NADELHAFT: Objection, hypothetical, 20 form, misstates the record. 21 A It would have -- would it have changed 22 about how I felt about that relationship? I don't</p>	<p style="text-align: right;">223</p> <p>1 express anger to Mr. Depp in connection with that 2 relationship, correct? 3 MR. NADELHAFT: Objection to the form. 4 A Yeah, she could get angry with Mr. Depp. 5 Q And she could, in connection with that 6 anger, she could yell, correct? 7 A I'm sure she could yell, yeah. 8 Q And she could make verbally abusive 9 statements; is that right? 10 MR. NADELHAFT: Objection to the form, 11 speculation. 12 A She never indicated that she made verbally 13 abusive statements, but I'm -- there's no way to 14 rule that out. Yeah, I mean, people, when they 15 get mad, say things that sometimes they regret, 16 and sometimes that can be hurtful. So it wouldn't 17 surprise me that she, you know, could do that. I 18 think most of us can at times. 19 Q Okay. And with respect to expressing her 20 anger in connection with her relationship with 21 Mr. Depp, did you ever come to understand that she 22 was physical with him, meaning physically abusive?</p>
<p style="text-align: right;">222</p> <p>1 know. I think my understanding, you know, Amber 2 was very transparent and honest with me about her 3 anger issues. She could get angry. And I think 4 it came from her background. I mean, she was -- 5 she was abused as a kid, and she wasn't going to 6 -- you know, fall into that again. 7 So she could get angry. I knew she had, 8 you know, she had a quick temper. I think from 9 hearing what she told me about Johnny, he had a 10 good temper. They both had good tempers. 11 Q Okay. Did she ever indicate to you how 12 she expressed that anger in connection with 13 relationships, whether it be yelling, pushing, 14 physical, et cetera? 15 MR. NADELHAFT: Objection, hearsay. 16 A No, I don't recall her talking about how 17 it was expressed. I just -- my impression was 18 that, you know, from her, that she was, you know, 19 quick to anger. 20 Q Okay. And you did -- you did understand, 21 or at least gain the understanding that, in 22 connection with her anger issues, that she did</p>	<p style="text-align: right;">224</p> <p>1 A Not -- not that I'm aware of. The one 2 thing I recall -- you know, we're now flipping 3 time, but, you know, going back to the incident in 4 December, I remember something she said to me, 5 because what struck me about it was the importance 6 of being able to de-escalate these kind of 7 conflicts when they got into whatever it was that 8 happened that night. I remember her saying, you 9 know, "I give as good as I get," and I thought, 10 That's dangerous, because, you know, all that does 11 is it perpetuates the conflict. It amplifies the 12 conflict, rather than calming the waters. 13 And so I made -- I just remember that 14 phrase, because it seemed an important one to deal 15 with. 16 Q And when she said, "I give as good as I 17 get," did that give you the impression that she 18 had been physically abusive to Mr. Depp? 19 MR. NADELHAFT: Objection, form, 20 speculation, hearsay. 21 A It didn't give me the impression, 22 necessarily, she had been abusive with him, but</p>

<p>225</p> <p>1 that she had the inclination to push back.</p> <p>2 Q Physically?</p> <p>3 A If he pushed her, she was going to push</p> <p>4 him back. And I never had the impression that she</p> <p>5 was the provocateur, but that she was indicating</p> <p>6 to me that she had a hard time, you know,</p> <p>7 de-escalating those type of situations.</p> <p>8 Q Okay. And you indicated that she never</p> <p>9 indicated to you -- you never gained the</p> <p>10 impression that she was a provocateur, but all you</p> <p>11 heard was her side of the story, right?</p> <p>12 A Of course. I'm limited to -- that is one</p> <p>13 of the limitations of working with someone, you</p> <p>14 hear their point of view, their side of the story.</p> <p>15 And is that the whole truth? You know, often not.</p> <p>16 There's another side.</p> <p>17 Q Okay. Let's continue here. We discussed</p> <p>18 the girlfriend line.</p> <p>19 A I think we're down to, "Three years ago</p> <p>20 met Johnny."</p> <p>21 Q Yeah, if you continue there, please.</p> <p>22 A "Last year and a half, alcohol and</p>	<p>227</p> <p>1 alcohol, Klonopin."</p> <p>2 A I think that she had told me she had been</p> <p>3 drinking and had been using Klonopin.</p> <p>4 Q Do you know what the effect is of mixing</p> <p>5 drinking and Klonopin?</p> <p>6 A Well, alcohol, you know, would amplify the</p> <p>7 affects of Klonopin. I mean, Klonopin is,</p> <p>8 basically, a sedative, and alcohol is a sedative,</p> <p>9 so the combination would, you know, would be a</p> <p>10 multiplier.</p> <p>11 Q Okay. And is Klonopin a subscribed dug?</p> <p>12 A Yes.</p> <p>13 Q I'm sorry, prescribed drug?</p> <p>14 A Prescribed, yes.</p> <p>15 Q The next line, please.</p> <p>16 A "Diagnosed with narcolepsy."</p> <p>17 I'm not sure who made that diagnosis. She</p> <p>18 must have just told me she had been diagnosed as</p> <p>19 having narcolepsy and was given Provigil, which is</p> <p>20 a medication for narcolepsy.</p> <p>21 Q Okay. Next line?</p> <p>22 A It looks like, "Fight over using (his)."</p>
<p>226</p> <p>1 Klonopin." So apparently she told me that there</p> <p>2 had been some amount of drinking.</p> <p>3 Q Let me stop you there. What does that</p> <p>4 say? "Last year and a half, alcohol," and what's</p> <p>5 the word?</p> <p>6 A "Klonopin." Klonopin is an anti-anxiety</p> <p>7 medication.</p> <p>8 Q So what is the reference here to</p> <p>9 "alcohol," and "Klonopin"?</p> <p>10 A I'm only kind of trying to, you know, read</p> <p>11 back what my thinking was when I jotted. You</p> <p>12 know, I'm sitting here talking to someone and</p> <p>13 jotting these notes down.</p> <p>14 Q I understand.</p> <p>15 A They're kind of a shorthand.</p> <p>16 Q Yeah, these are -- hopefully, refresh your</p> <p>17 recollection. I understand it was a while ago,</p> <p>18 but you did, in fact, write this, and, often, when</p> <p>19 people read what they wrote in the past, they do</p> <p>20 -- are able to indicate of what they meant at the</p> <p>21 time.</p> <p>22 Here you say, "Last year and a half</p>	<p>228</p> <p>1 I think it was -- she was talking about a fight</p> <p>2 over Johnny's using drugs, is his using.</p> <p>3 "I have a short fuse."</p> <p>4 Q Let me stop you there. She says, "I have</p> <p>5 a short fuse"?</p> <p>6 A Yes.</p> <p>7 Q What's your understanding of her</p> <p>8 temperament in that regard?</p> <p>9 A That she had a quick temper. She would</p> <p>10 get angry easily.</p> <p>11 Q And did you ever experience that?</p> <p>12 A Not personally, no. I never -- I never</p> <p>13 experienced her anger at all.</p> <p>14 Q Okay. And what did she -- did she ever</p> <p>15 give you -- did she give you examples of her</p> <p>16 "short fuse"?</p> <p>17 A Just that she had a quick temper. You</p> <p>18 know, she would talk about, they would get into</p> <p>19 something, and, you know, one of them would light</p> <p>20 the fuse. I don't know sometimes it was probably</p> <p>21 her, and sometimes it was probably him. And, you</p> <p>22 know, she said -- you know, she was talking about</p>

<p style="text-align: right;">229</p> <p>1 having a difficult time controlling angry 2 feelings, and that she had, you know, she had a 3 quick temper. That's what I'm saying, I think she 4 was attempting to be very honest with me. 5 I see, "Get impatient," here. I always 6 get the brunt of," it looks like, "F's abuse." I 7 guess she went back to her father for the moment. 8 Q Okay. 9 A And then, "Three months ago, left him 10 because of his using." 11 I don't know why – it looks like, "F's 12 abuse," so I'm not sure what I meant by that. 13 Q And where it says, "Three months ago left 14 him because of his using," could that have been a 15 reference to her father? 16 MR. NADELHAFT: Objection, asked and 17 answered, form, misstates the record. 18 A You know, I don't know whether she's 19 talking about – I mean, I'm assuming she is 20 talking about Johnny, "left him because of his 21 using." She was certainly not with her father at 22 this point. So, "three months ago," I don't think</p>	<p style="text-align: right;">231</p> <p>1 brought up those memories and brought up, you 2 know, worries, that this would be a similar kind 3 of destructive situation. 4 MR. PRESIADO: Okay. We've been going 5 about an hour now. Can we take a 10-minute break. 6 MR. NADELHAFT: Okay. 7 THE VIDEOGRAPHER: Going off the record at 8 1818. 9 (A recess was taken.) 10 THE VIDEOGRAPHER: We are back on the 11 record at 1831. 12 MR. PRESIADO: Okay. Brennan, if you 13 could put back up that page I was inquiring about. 14 (Document displayed.) 15 MR. PRESIADO: Yes, thank you. 16 BY MR. PRESIADO: 17 Q Back to this document, Dr. Cowan, and I 18 want to focus your attention on this portion where 19 you randomly discussed about her girlfriend, 20 Ms. Amber's girlfriend – I'm sorry, Ms. Heard's 21 girlfriend of five years. And in reference to 22 that, the line under it says, "panic attacks."</p>
<p style="text-align: right;">230</p> <p>1 I would have said three months ago she left her 2 father because of his using, so I'm assuming I 3 meant that about Johnny. 4 Q And her again referencing her father's 5 abuse here, was it your understanding that her 6 father's abuse had a profound affect on her mental 7 state? 8 MR. NADELHAFT: Objection to form, 9 misstates the record. 10 A Yes. I – I think when you're abused – 11 look, if you don't feel safe around your mother 12 and your father, who are you going to feel safe 13 around? And for a girl not to feel safe, you 14 know, around her father who was supposed to be 15 protective and nurturing and there for you, is 16 profoundly, you know, destabilizing. So yeah, I 17 think, now that I read it, "I always got the brunt 18 of my father's abuse." 19 I think she was talking about they are – 20 the fear that she had around her father's drug 21 abuse, and his abuse of her. And, I think, you 22 know, her talking about Johnny's use of drugs</p>	<p style="text-align: right;">232</p> <p>1 What do you recall with respect to 2 Ms. Heard talking about panic attacks about this 3 previous relationship? 4 MR. NADELHAFT: Objection to hearsay. 5 A What do I recall about her discussion 6 about panic attacks? Only – I'm just looking at 7 my note here. I'm assuming that she told me she 8 had some history of having anxiety attacks. 9 Q Okay. So it wasn't necessarily in 10 connection with her relationship, it was discussed 11 about, just generally, her indication of panic 12 attacks? 13 A Yeah, I think it was just generally. I 14 mean, she was – she had a, you know, she had a 15 difficult childhood, and it leaves people, you 16 know, very often feeling unsafe and they have 17 control issues. Anxiety is an all-around feeling 18 in control or out of control, and certain things 19 are triggers that create greater feelings of being 20 out of control, and then they result, in, you 21 know, the symptoms of panic attack. 22 Q Okay. So over the course of your</p>

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233	<p>1 treatment, did you come to understand that she</p> <p>2 suffered from chronic panic attacks?</p> <p>3 A Yeah. Panic attacks are ways that, you</p> <p>4 know, the patients have –</p> <p>5 (Whereupon, a phone makes a sound.)</p> <p>6 A Let me turn this off.</p> <p>7 Of describing the kind of amplitude of how</p> <p>8 anxious they're feeling. When they say "panic</p> <p>9 attack," it's when the anxiety, you know, comes</p> <p>10 on, usually quickly, and is pretty overwhelming.</p> <p>11 And yeah, Amber, you know, had those kinds</p> <p>12 of anxious moments.</p> <p>13 Q And you would describe it as "chronic"?</p> <p>14 A Well, it was certainly the whole time that</p> <p>15 I had seen her, and there was a history of it, you</p> <p>16 know, from her adolescence on; so yes, I think</p> <p>17 that would be – we could call that "chronic,"</p> <p>18 yeah.</p> <p>19 Q Okay. Great.</p> <p>20 With respect to – I had another question</p> <p>21 about --</p> <p>22 MR. PRESIADO: Brennan, can you give me</p>	235	<p>1 the result of being the effect of anyone's anger,</p> <p>2 and the, you know, the kind of disinhibiting</p> <p>3 effects of using drugs and how that affects that</p> <p>4 anger/destruction.</p> <p>5 Q Thank you. Okay.</p> <p>6 MR. PRESIADO: Okay. Brennan if you could</p> <p>7 put up what was previously marked in this</p> <p>8 deposition as Exhibit 1.</p> <p>9 And if you could give me control please.</p> <p>10 THE TECHNICIAN: (Complies.)</p> <p>11 BY MR. PRESIADO:</p> <p>12 Q Dr. Cowan, this is one of the first</p> <p>13 documents that you were shown this morning, and,</p> <p>14 as you can see, you're not involved in this,</p> <p>15 per se. It's an e-mail from Dr. Kipper, to</p> <p>16 Ms. Dembrowski, but you were asked about a portion</p> <p>17 of it. Let me see if I can find it. Here it is.</p> <p>18 "They evidently had a fight. She claims</p> <p>19 he pushed her, and she asked him to leave the</p> <p>20 house."</p> <p>21 Based on your previous testimony,</p> <p>22 Ms. Heard never indicated to you that Mr. Depp</p>
234	<p>1 control again.</p> <p>2 THE TECHNICIAN: (Complies.)</p> <p>3 MR. PRESIADO: Thank you.</p> <p>4 BY MR. PRESIADO:</p> <p>5 Q Now, I just want to ask you another</p> <p>6 question about this statement here, where my</p> <p>7 cursor is: "I always got the brunt of Father's</p> <p>8 abuse."</p> <p>9 Having read that, does that refresh your</p> <p>10 recollection with any details with respect to</p> <p>11 that, such as her having to protect her mother, or</p> <p>12 defend her mother or sibling, or anything in that</p> <p>13 regard?</p> <p>14 MR. NADELHAFT: Objection to the form,</p> <p>15 misstates the record, hearsay.</p> <p>16 A Yes. I think that her father was not only</p> <p>17 abusive to Amber, but he was abusive to the</p> <p>18 mother. I think that was in – this happens a lot</p> <p>19 of times with kids, where, you know, one of the</p> <p>20 kids stands up in a protective way, you know, of</p> <p>21 the mother or other siblings.</p> <p>22 And so it made Amber very sensitized to</p>	236	<p>1 pushed her to the ground; is that right?</p> <p>2 A What's – the date on this is what?</p> <p>3 Q August 18th, 2014.</p> <p>4 A Oh, no. No.</p> <p>5 Q Okay.</p> <p>6 A No, I never heard about this.</p> <p>7 Q Okay. And, in connection with your</p> <p>8 initial consultation with her, which was eight</p> <p>9 days later, she didn't tell you that she was</p> <p>10 pushed down to the ground by Mr. Depp; is that</p> <p>11 right?</p> <p>12 A No, she didn't.</p> <p>13 Q In fact, during the whole course of your</p> <p>14 treatment of her, you never saw any signs of</p> <p>15 physical abuse on Ms. Heard; isn't that right?</p> <p>16 A That's correct.</p> <p>17 Q You never saw any sign of injury on</p> <p>18 Ms. Heard; is that right?</p> <p>19 MR. NADELHAFT: Objection to form,</p> <p>20 foundation.</p> <p>21 A No, I did not.</p> <p>22 Q And by "injury," I mean physical injury;</p>

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237	<p>1 is that how you understood the question?</p> <p>2 A Yes.</p> <p>3 Q And you never saw her with black eyes; is</p> <p>4 that right?</p> <p>5 MR. NADELHAFT: Objection to the form.</p> <p>6 A No, I did not.</p> <p>7 Q I'm sorry?</p> <p>8 A I did not.</p> <p>9 Q And you never saw her with any kind of</p> <p>10 facial bruising, correct?</p> <p>11 MR. NADELHAFT: Objection to the form,</p> <p>12 foundation.</p> <p>13 A That's correct.</p> <p>14 Q And you -- and you never saw her with a</p> <p>15 broken nose; that's right, isn't it?</p> <p>16 MR. NADELHAFT: Objection to form,</p> <p>17 foundation.</p> <p>18 A That's correct.</p> <p>19 MR. PRESIADO: Brennan, if you could take</p> <p>20 this down and put up what was previously marked as</p> <p>21 Exhibit 2.</p> <p>22 (Document displayed.)</p>	239	<p>1 tonight"?</p> <p>2 A Well, when she came in, we discussed it,</p> <p>3 yeah.</p> <p>4 Q But she didn't tell you that he had</p> <p>5 physically abused her; is that right?</p> <p>6 MR. NADELHAFT: Objection, asked and</p> <p>7 answered.</p> <p>8 A My recollection is that she told me that</p> <p>9 he pushed her down and she got right back up, and</p> <p>10 I think that's when I, you know, she said, "I give</p> <p>11 as good as I get." And, you know, we discussed,</p> <p>12 you know, the danger of escalation versus</p> <p>13 de-escalation, and the importance of her being</p> <p>14 able to do that.</p> <p>15 Q So she gave you the impression that she</p> <p>16 pushed him as well that night; is that right?</p> <p>17 MR. NADELHAFT: Objection.</p> <p>18 A She didn't say she pushed him, she just</p> <p>19 said, I got right back up. She told me that he</p> <p>20 pushed her down, and she got right back up.</p> <p>21 Q But she also said she "gives" as good as</p> <p>22 she "gets," doesn't that indicate that she pushed</p>
238	<p>1 BY MR. PRESIADO:</p> <p>2 Q And, again, this is a document that was</p> <p>3 shown to you earlier this morning. This was</p> <p>4 created by you and you testified this was an</p> <p>5 e-mail exchange between you and Ms. Heard; is that</p> <p>6 right?</p> <p>7 A These are texts, yeah, between the two of</p> <p>8 us.</p> <p>9 Q You're right, text exchanges. Thank you.</p> <p>10 Now, at the bottom of the first page, she</p> <p>11 states to you, "Johnny did a number on me</p> <p>12 tonight."</p> <p>13 Did you ever speak to her to clarify what</p> <p>14 she meant by that?</p> <p>15 A Not until the next time I saw her.</p> <p>16 Q Okay.</p> <p>17 A And I don't know when that came in, but</p> <p>18 I'm looking here. It came in a little after</p> <p>19 midnight. I didn't hear the phone, I didn't see</p> <p>20 the text until the very next day.</p> <p>21 Q Did she ever give you any details on what</p> <p>22 she meant by that, "Johnny did a number on me</p>	240	<p>1 him as well?</p> <p>2 MR. NADELHAFT: Objection, asked and</p> <p>3 answered.</p> <p>4 A You could interpret it that way. I kind</p> <p>5 of interpreted it more, you know, metaphorically,</p> <p>6 that, when somebody comes at her, she goes back at</p> <p>7 them, you know, in a similar way, whether it's</p> <p>8 verbally or she protects herself. So maybe she</p> <p>9 pushed him back. I don't know.</p> <p>10 Q Okay. And you'll agree with me -- you</p> <p>11 only heard her side of the story with respect to</p> <p>12 this incident, correct?</p> <p>13 A Yeah.</p> <p>14 Q So for example, you don't know if Mr. Depp</p> <p>15 acted in self-defense, right?</p> <p>16 MR. NADELHAFT: Objection, form and</p> <p>17 foundation --</p> <p>18 A No, I can't --</p> <p>19 MR. NADELHAFT: -- misstates the record.</p> <p>20 BY MR. PRESIADO:</p> <p>21 Q So in fact, Mr. Depp could have acted in</p> <p>22 self-defense, but you don't know because you only</p>

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241	<p>1 heard one side of the story; is that fair to say?</p> <p>2 MR. NADELHAFT: Objection to form,</p> <p>3 speculation.</p> <p>4 BY MR. PRESIADO:</p> <p>5 Q I'm sorry, I missed that answer.</p> <p>6 A That's certainly so.</p> <p>7 MR. PRESIADO: Madame reporter, did you</p> <p>8 get that?</p> <p>9 THE COURT REPORTER: Yeah, I'm actually</p> <p>10 having trouble. Mr. Nadelhaft, you're very quiet</p> <p>11 to me. Can you just be a little louder, because</p> <p>12 we're talking over each other.</p> <p>13 MR. NADELHAFT: Sure.</p> <p>14 THE COURT REPORTER: Thanks.</p> <p>15 MR. PRESIADO: Did you get the objection?</p> <p>16 THE COURT REPORTER: I got the objection,</p> <p>17 but I didn't get the answer. Thank you.</p> <p>18 MR. PRESIADO: Okay. Why don't we, Debi,</p> <p>19 if you could read back the question.</p> <p>20 And, Dr. Cowan, she didn't get your</p> <p>21 answer, so if you could just repeat it after you</p> <p>22 listen.</p>	243	<p>1 know, it felt like it was an emotionally chaotic,</p> <p>2 volatile, angry, toxic, conflicted, you know,</p> <p>3 suspicious, accusing, kind of relationship.</p> <p>4 And --</p> <p>5 Q Now --</p> <p>6 A -- and so that could be really damaging</p> <p>7 psychologically. Both -- I didn't feel that Amber</p> <p>8 was in -- I never had the feeling Johnny wanted to</p> <p>9 hurt her.</p> <p>10 Q Thank you.</p> <p>11 Now, Dr. Cowan, if, in fact, you felt that</p> <p>12 she was in danger with respect to -- or in</p> <p>13 connection with her relationship with Mr. Depp,</p> <p>14 wouldn't you have done something to the extent of</p> <p>15 alerting the authorities, or doing something to</p> <p>16 provide for her safety?</p> <p>17 MR. NADELHAFT: Objection to the form,</p> <p>18 foundation, hypothetical.</p> <p>19 A Yes, I didn't have the feeling that she</p> <p>20 felt in danger imminently.</p> <p>21 Q Thank you.</p> <p>22 And you had quite a few sessions with her,</p>
242	<p>1 (Whereupon, the previous question was read</p> <p>2 back by the court reporter.)</p> <p>3 THE WITNESS: That's correct.</p> <p>4 MR. PRESIADO: Thank you.</p> <p>5 BY MR. PRESIADO:</p> <p>6 Q Thank you. Now, having read this and</p> <p>7 having the discussion with her, you didn't think</p> <p>8 she was in any kind of a physical danger with</p> <p>9 respect to Mr. Depp; is that right?</p> <p>10 MR. PRESIADO: Objection, asked and</p> <p>11 answered.</p> <p>12 A Well, when someone tells me, you know,</p> <p>13 they've gotten into a physical altercation, that's</p> <p>14 always concerning. It felt -- there had been,</p> <p>15 over a long period of time, so many descriptions</p> <p>16 of, you know, various levels of arguing and</p> <p>17 fighting, I didn't -- I didn't feel that she was</p> <p>18 in some kind of imminent danger.</p> <p>19 Q Okay. And that's true for the whole</p> <p>20 entire course of you knowing her and treating her;</p> <p>21 isn't that right?</p> <p>22 A She never gave me that impression. You</p>	244	<p>1 right, where she could have expressed that. Is it</p> <p>2 fair to say that the document you saw, which</p> <p>3 itemized each of her visits -- and I can show it</p> <p>4 to you again -- is it fair to say that that sets</p> <p>5 forth a number of exhibit -- I'm sorry, the number</p> <p>6 of visits she had with you?</p> <p>7 A I'm not sure.</p> <p>8 Q Yeah, let me restate that. That was</p> <p>9 poorly put forth. Let me -- there's a document.</p> <p>10 MR. PRESIADO: Brennan, I think this is</p> <p>11 it. If you would put up what was previously</p> <p>12 marked as Exhibit 5.</p> <p>13 (Document displayed.)</p> <p>14 MR. PRESIADO: Yeah, there we go.</p> <p>15 BY MR. PRESIADO:</p> <p>16 Q Do you recall this document, Dr. Cowan --</p> <p>17 MR. PRESIADO: If we can go down to the</p> <p>18 graph at the bottom -- or give me control.</p> <p>19 A Yeah, I see the document.</p> <p>20 Q So this represents all of the visits that</p> <p>21 you have had with her -- with Ms. Heard; is that</p> <p>22 right?</p>

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<p>245</p> <p>1 A That's true.</p> <p>2 Q So for example, in September of 2014, you</p> <p>3 had 11 sessions with Ms. Heard; is that accurate?</p> <p>4 A I'm not counting, but I'm assuming your</p> <p>5 count is accurate.</p> <p>6 Q Okay. So would you agree with me that you</p> <p>7 saw her on a very regular basis?</p> <p>8 A Yeah.</p> <p>9 MR. NADELHAFT: Objection, vague.</p> <p>10 BY MR. PRESIADO:</p> <p>11 Q Okay.</p> <p>12 A There were certainly gaps when she was out</p> <p>13 of town and working, but, yes.</p> <p>14 Q Okay. Through the entire course of your</p> <p>15 treatment of her, from August 2014 through</p> <p>16 February 2016, you never gained the impression</p> <p>17 that she was in any kind of physical danger in</p> <p>18 connection with her relationship with Mr. Depp; is</p> <p>19 that accurate?</p> <p>20 MR. NADELHAFT: Objection, form and</p> <p>21 foundation.</p> <p>22 A No. That is accurate, yes.</p>	<p>247</p> <p>1 Can you please help make time for me."</p> <p>2 When, in connection with this text, did</p> <p>3 you next see her?</p> <p>4 A I would have to look at the next date on</p> <p>5 my calendar. I don't -- I can't tell from this</p> <p>6 document.</p> <p>7 Q Okay. So this is December 16, 2015.</p> <p>8 MR. PRESIADO: Brennan, if you could put</p> <p>9 up the last chart.</p> <p>10 (Document displayed.)</p> <p>11 Q So you, in fact, saw her on the 17th of</p> <p>12 December 2016, correct, the next day?</p> <p>13 A Yeah.</p> <p>14 Q Is that correct?</p> <p>15 A Yes.</p> <p>16 Q And, in fact, you saw her for an hour and</p> <p>17 a half; is that what that indicates?</p> <p>18 A Yes.</p> <p>19 Q And you did not see any indication of</p> <p>20 black eyes on the 17th; isn't that right?</p> <p>21 A That's true.</p> <p>22 Q And you didn't see any indication of a</p>
<p>246</p> <p>1 Q Okay. Thank you.</p> <p>2 MR. PRESIADO: All right. Brennan, if you</p> <p>3 can take that down and go back to the previous</p> <p>4 document.</p> <p>5 (Document displayed.)</p> <p>6 BY MR. PRESIADO:</p> <p>7 Q Here, where you say, "So sorry Amber.</p> <p>8 Come over today at 11:00."</p> <p>9 She did not, in fact, come over at that</p> <p>10 time; is that right?</p> <p>11 A No, she did not.</p> <p>12 Q And do you see here, that she has,</p> <p>13 "Connell, sorry I haven't called" -- strike that.</p> <p>14 Let me start by indicating the date. The</p> <p>15 date of this text to you is December 16th, 2015,</p> <p>16 she says, "Connell, sorry haven't called because</p> <p>17 Rocky came over last night, then dealt with</p> <p>18 security and called nurse for medical help, and</p> <p>19 then went down to sleep. Today has been filled</p> <p>20 with work. I'm shooting a Late Show appearance</p> <p>21 today (with two black eyes). In short? I need</p> <p>22 your help. But will have time tomorrow to get it.</p>	<p>248</p> <p>1 broken nose; isn't that right?</p> <p>2 A That's true.</p> <p>3 Q You didn't see any indication of physical</p> <p>4 injury at all; isn't that right?</p> <p>5 A That's correct.</p> <p>6 MR. PRESIADO: Brennan, you can take down</p> <p>7 this chart.</p> <p>8 And, again, Brennan, if you could put up</p> <p>9 the text chain I was examining before this one.</p> <p>10 (Document displayed.)</p> <p>11 MR. PRESIADO: Thank you.</p> <p>12 BY MR. PRESIADO:</p> <p>13 Q So on December 16th, 2015, she indicates</p> <p>14 in her text to you that she had two black eyes,</p> <p>15 and that, "Johnny beat me up pretty good last</p> <p>16 night," yet, the very next day, you saw absolutely</p> <p>17 no indications of physical injury; isn't that</p> <p>18 right?</p> <p>19 MR. NADELHAFT: Objection to the form,</p> <p>20 foundation, asked and answered, assumes facts not</p> <p>21 in evidence.</p> <p>22 A I didn't -- yeah, I didn't notice anything</p>

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<p>249</p> <p>1 physically wrong with her.</p> <p>2 Q Thank you.</p> <p>3 MR. PRESIADO: Brennan, if you could give</p> <p>4 me control, please, of this document.</p> <p>5 THE TECHNICIAN: (Complies.)</p> <p>6 MR. PRESIADO: Thank you.</p> <p>7 BY MR. PRESIADO:</p> <p>8 Q Did -- over the course of your treatment</p> <p>9 of Ms. Heard, did you get the impression that she</p> <p>10 often exaggerated circumstances?</p> <p>11 MR. NADELHAFT: Objection to form, asked</p> <p>12 and answered, foundation.</p> <p>13 A Are you talking about what she -- the text</p> <p>14 message.</p> <p>15 Q No, I'm just talking in general at this</p> <p>16 point.</p> <p>17 A No. My impression of Amber was that she</p> <p>18 was a pretty good reporter. You know, I didn't --</p> <p>19 I didn't catch her, you know, as I often do,</p> <p>20 with -- exaggerating anything that -- that we</p> <p>21 said. So there was no indication to me that she</p> <p>22 made, you know -- said something that wasn't a</p>	<p>251</p> <p>1 want someone to leave, they want to feel safe.</p> <p>2 But sometimes their dependency on that person is</p> <p>3 such that they don't necessarily feel safe and</p> <p>4 they don't want them to leave despite feeling</p> <p>5 unsafe, if that makes any sense.</p> <p>6 Q Yeah, that makes sense generally, but with</p> <p>7 respect to this text string here, that's not the</p> <p>8 assessment you made at this time; isn't that</p> <p>9 right?</p> <p>10 MR. NADELHAFT: Objection, asked and</p> <p>11 answered.</p> <p>12 BY MR. PRESIADO:</p> <p>13 Q This specific assessment?</p> <p>14 MR. NADELHAFT: Same objections.</p> <p>15 A I don't think she was feeling unsafe,</p> <p>16 physically, at that time.</p> <p>17 Q Okay. Thank you.</p> <p>18 MR. PRESIADO: Brennan, if you could take</p> <p>19 that down and put up what was previously marked as</p> <p>20 Exhibit 3, please.</p> <p>21 (Document displayed.)</p> <p>22 BY MR. PRESIADO:</p>
<p>250</p> <p>1 fair reporting. But, you know, I don't know. I</p> <p>2 mean, it's -- people can exaggerate and distort,</p> <p>3 and they tell things from their point of view, so</p> <p>4 I can't know.</p> <p>5 But my impression was not that she was a</p> <p>6 big exaggerator.</p> <p>7 Q Okay. Further down in this text chain,</p> <p>8 December 20th, 2015, which is four days after the</p> <p>9 text message where she references black eyes, do</p> <p>10 you see that she says, "He wants to say bye to me.</p> <p>11 He came over to grab some things. I just don't</p> <p>12 want him to leave."</p> <p>13 Does that indicate to you that she felt</p> <p>14 safe with him, physically, at least as of this</p> <p>15 text message?</p> <p>16 MR. NADELHAFT: Objection, speculation.</p> <p>17 A That's a very tricky situation. You know,</p> <p>18 I've known, you know, victims of domestic abuse</p> <p>19 who want to stay, and do they feel safe? Not</p> <p>20 necessarily. Feeling safe and wanting someone to</p> <p>21 stay can be mutually exclusive, unfortunately. If</p> <p>22 someone feels unsafe, they don't, necessarily,</p>	<p>252</p> <p>1 Q And, again, you were asked about this</p> <p>2 document this morning, Dr. Cowan. It's dated</p> <p>3 December 17th, 2015. And that's the date that she</p> <p>4 visited you that we discussed --</p> <p>5 A Yeah.</p> <p>6 Q -- after the black eye text.</p> <p>7 It says here, "Some spark ignited an</p> <p>8 argument that escalated and got violent."</p> <p>9 So the testimony that you gave that you</p> <p>10 did not see any sign of injury on her on</p> <p>11 December 17th, this is that particular meeting</p> <p>12 with her, face-to-face meeting with her; isn't</p> <p>13 that right?</p> <p>14 A That's correct.</p> <p>15 Q Okay.</p> <p>16 MR. PRESIADO: Okay. You can take that</p> <p>17 down, Brennan. Thank you.</p> <p>18 Q There was also a statement in there that</p> <p>19 it's hard for her to, "de-escalate."</p> <p>20 What did you mean by that?</p> <p>21 A Well, when you -- if somebody gets into a</p> <p>22 conflict with someone else, they have two choices,</p>

<p>253</p> <p>1 they can -- they can escalate the conflict, or 2 they can kind of take the air out of it. They can 3 have a calming influence. I think it was hard for 4 Amber to regulate her own emotions, and it was 5 hard for her to have a calming influence. 6 So when they would get into disputes, 7 whoever started that, you know, once they were 8 going, it was hard for her to not express her 9 anger, and he would express his, and they would be 10 off to the races. 11 Q And was that your understanding throughout 12 the course of your treatment of her? 13 A It was. You know, I think they had a very 14 volatile, emotional relationship. 15 MR. PRESIADO: Brennan, if you could put 16 up for me what was previously marked as Exhibit 6. 17 (Document displayed.) 18 Q Before I get to this document, Dr. Cowan, 19 over the course of your just over two years of 20 treating her, Ms. Heard, did you ever see any 21 symptom improvements? 22 A Yeah, when I saw the improvement was</p>	<p>255</p> <p>1 A Yes, it is. 2 Q And to the extent you saw improvements, 3 what were the improvements you noticed during that 4 short period of time? 5 A She just seemed calmer, you know, more 6 regulated emotionally, feeling more capable of 7 being on her own, and feeling okay with that. 8 Just a general sense of being in -- in a more 9 stable kind of mood, less anxious. 10 Q But because you saw her for just such a 11 short period of time after her and Johnny 12 separated -- excuse me, her and Mr. Depp 13 separated, you don't know how long those 14 improvements lasted, right? 15 A No. I have no way of knowing. 16 Q Okay. And if her relationship with 17 Mr. Depp had -- strike that. 18 MR. PRESIADO: You can take -- hang on. 19 This is 6? 20 Okay. You can take that down, please. 21 Brennan, if you don't mind putting up 22 Exhibit 8, and giving me control, please.</p>
<p>254</p> <p>1 really when she was away from Johnny. The two of 2 them together were -- it was not a good mix. And 3 I think they both had the effect of triggering one 4 another, and I -- I didn't really see any kind of 5 -- there was certainly intellectual clarity as to 6 why this was not a healthy, constructive, 7 nurturing relationship for her that grew over a 8 period of time. 9 That's often the case. Somebody 10 understands they're in a situation that's not good 11 for them, not healthy for them intellectually, but 12 they're stuck there because of the way they feel, 13 so it's very difficult for them to disengage and 14 disconnect. 15 And when I saw her really improve 16 emotionally was at the very end, you know, when 17 she -- when they were separated. 18 Q But you only saw her for a short period of 19 time after they separated, correct? 20 A That's right. She didn't stay in therapy. 21 Q So would you agree with me that's a pretty 22 small sample size?</p>	<p>256</p> <p>1 (Document displayed.) 2 BY MR. PRESIADO: 3 Q Again, Dr. Cowan, you were asked about 4 this document earlier today. I want to ask you a 5 couple of questions about your testimony. 6 Here, where my cursor is, it says -- you 7 wrote, "His narcissism presents enormous 8 challenges." 9 Now, that's not a diagnosis of Mr. Depp on 10 your part, correct? 11 A No. That's not -- I didn't mean that as a 12 diagnostic statement. 13 Q You made it -- 14 A No, you're right. 15 Q Okay. As a matter of fact, you only met 16 him in person once; is that right? 17 A That's correct. 18 Q Okay. And in that short period of time 19 you met with him, you could not diagnosis him as 20 narcissistic; is that right? 21 A No. 22 Q Okay.</p>

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257	<p>1 A That's correct.</p> <p>2 Q And you did no analysis, at all, to</p> <p>3 determine whether or not Mr. Depp is, in fact, a</p> <p>4 narcissist clinically; is that right?</p> <p>5 A That's right.</p> <p>6 Q And to the extent you came up with this</p> <p>7 statement here, it's based entirely on what you</p> <p>8 were told by Ms. Heard; is that right?</p> <p>9 A Yes. You know, my one experience with him</p> <p>10 didn't run counter to that, unfortunately.</p> <p>11 Q Okay. But other than that short</p> <p>12 encounter, whereby you did not assess him for</p> <p>13 narcissism, this statement comes from what you</p> <p>14 learned -- or what you heard solely from</p> <p>15 Ms. Heard; is that right?</p> <p>16 A That's correct.</p> <p>17 Q Okay. And, again, with respect to</p> <p>18 everything you did hear from Ms. Heard, you will</p> <p>19 agree with me that was only one side of the story</p> <p>20 with respect to their relationship; isn't that</p> <p>21 right?</p> <p>22 MR. NADELHAFT: Objection, form and</p>	259	<p>1 You can take that down, Brennan. Thank</p> <p>2 you.</p> <p>3 THE TECHNICIAN: (Complies.)</p> <p>4 BY MR. PRESIADO:</p> <p>5 Q Now, I just want to take you back to the</p> <p>6 one meeting you did, in fact, have with Mr. Depp.</p> <p>7 It was both Ms. Heard and Mr. Depp.</p> <p>8 Was that at your office?</p> <p>9 A Yes.</p> <p>10 Q Okay. And the single joint session that</p> <p>11 you had with them?</p> <p>12 A That's correct.</p> <p>13 Q And you indicated that Mr. Depp left</p> <p>14 early?</p> <p>15 A Yes. Yeah, with Amber.</p> <p>16 Q Okay. Great. And you indicated that one</p> <p>17 of his last utterances was that he felt he was</p> <p>18 being lied to by Ms. Heard; is that right?</p> <p>19 A He -- the word that he used was "trust."</p> <p>20 My understanding is that he didn't trust what she</p> <p>21 told him.</p> <p>22 Q Okay.</p>
258	<p>1 foundation.</p> <p>2 A That's correct.</p> <p>3 MR. PRESIADO: Okay. Brennan, you can</p> <p>4 take that down, please.</p> <p>5 THE TECHNICIAN: (Complies.)</p> <p>6 MR. PRESIADO: Brennan, if you could you</p> <p>7 put up what was previously marked as Exhibit 10,</p> <p>8 please.</p> <p>9 (Document displayed.)</p> <p>10 BY MR. PRESIADO:</p> <p>11 Q Again, Dr. Cowan, you were asked about</p> <p>12 this e-mail -- I'm sorry, text exchange earlier</p> <p>13 today. Let's see.</p> <p>14 (Whereupon, a pause in the proceedings</p> <p>15 occurred.)</p> <p>16 Okay. I don't mean to make you have to</p> <p>17 read this again, Dr. Cowan, but I just want to</p> <p>18 point out here, there's no mention, throughout</p> <p>19 this entire text string, of any physical abuse; is</p> <p>20 that right?</p> <p>21 A No, there's not.</p> <p>22 MR. PRESIADO: Okay.</p>	260	<p>1 A But the distrust was around jealousy and</p> <p>2 her being transparent, in terms of her</p> <p>3 relationships with the men that she worked with.</p> <p>4 Q But you don't know, one way or another,</p> <p>5 whether or not she was being transparent with</p> <p>6 Mr. Depp in that regard; is that right?</p> <p>7 MR. NADELHAFT: Objection to form and</p> <p>8 foundation.</p> <p>9 A Yes, there's no way for me to know.</p> <p>10 Q Okay. Now, you also indicated that you</p> <p>11 had a discussion with a Dr. Dawn Hughes; do you</p> <p>12 recall that testimony?</p> <p>13 A Yes.</p> <p>14 Q When was that?</p> <p>15 A You know, I don't have -- I don't know the</p> <p>16 date. It was some time ago. It was months ago.</p> <p>17 Q Okay. But you would estimate it was two</p> <p>18 or three months ago?</p> <p>19 A I think even longer than that. I would</p> <p>20 say more like six months ago, but I'm not</p> <p>21 positive.</p> <p>22 Q And how is it that you spoke with him.</p>

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261	<p>1 Did he call you, did someone call you and</p> <p>2 introduce you; how did that work?</p> <p>3 A Someone called me and said they were</p> <p>4 representing — they had been hired as an expert</p> <p>5 witness or as a consultant, and had Amber's</p> <p>6 release to have me talk with her.</p> <p>7 Q Okay. Did you actually view a physical</p> <p>8 release?</p> <p>9 A I don't recall whether — how that — I</p> <p>10 don't have a document to —</p> <p>11 Q Okay.</p> <p>12 A — to show that.</p> <p>13 Q Well, is it safe to say, and would you</p> <p>14 agree with me that -- well, strike that.</p> <p>15 Is it safe to say that you wouldn't have</p> <p>16 spoken without getting some assurance that</p> <p>17 Mr. Heard — I'm sorry, Ms. Heard was permitting</p> <p>18 the discussion?</p> <p>19 A Yes.</p> <p>20 Q Okay. And how long was that conversation?</p> <p>21 A Forty-five minutes to an hour.</p> <p>22 Q Was there anybody else involved in that</p>	263	<p>1 Q Okay. Go ahead.</p> <p>2 A Similar kinds of questions to, you know,</p> <p>3 those that, you know, have been posed today. I</p> <p>4 mean, they all had to do with what my impressions</p> <p>5 were about Amber and her relationship with Johnny,</p> <p>6 her truthfulness, my impression of whether it had</p> <p>7 been abusive, the relationship, and -- I mean, it</p> <p>8 was in that domain, her questions were.</p> <p>9 Q Okay. And, to the extent you answered</p> <p>10 those questions, are they in line with your</p> <p>11 testimony today?</p> <p>12 A Yes.</p> <p>13 Q Okay. So your testimony today in</p> <p>14 connection with you not seeing physical injuries,</p> <p>15 et cetera, you related that to Mr. -- Ms. Hughes?</p> <p>16 A Yes.</p> <p>17 Q You related to Ms. Hughes, as you</p> <p>18 testified here today, that you did not believe</p> <p>19 Mr. Depp was physically abusive to Ms. Heard; is</p> <p>20 that right?</p> <p>21 MR. NADELHAFT: Objection, misstates the</p> <p>22 testimony.</p>
262	<p>1 conversation, other than the two of you?</p> <p>2 A No. Not that I know of. Not that I'm</p> <p>3 aware of.</p> <p>4 Q Okay.</p> <p>5 A Certainly not on my side.</p> <p>6 Q And is that true for the entirety of the</p> <p>7 conversation? In other words when Mr. Hughes</p> <p>8 [sic] first came on, was somebody else on the</p> <p>9 line, maybe an attorney or somebody, or was it</p> <p>10 your recollection it was the two you the entire</p> <p>11 time?</p> <p>12 A I think it was just the two of us the</p> <p>13 entire time.</p> <p>14 Q Okay. And I know it was a few months ago</p> <p>15 and 45 minutes, but can you tell me what he asked</p> <p>16 you and what you told him? I know you can't</p> <p>17 remember verbatim, but give me your best --</p> <p>18 A Well, it wasn't a "him." It was a "her."</p> <p>19 I'm sure it was a "her."</p> <p>20 Q It may have been. I don't know one way or</p> <p>21 the other. I made an assumption.</p> <p>22 A Yeah, it was definitely her.</p>	264	<p>1 A I — I told her — she brought up the</p> <p>2 incident, and I told her what I said today, that</p> <p>3 she told me that Johnny had pushed her down, that</p> <p>4 she jumped right back up, and that's when she told</p> <p>5 me, "I give as good as I get." And we then</p> <p>6 started talking about, you know, how dangerous</p> <p>7 that can be, to escalate conflict, and maybe some</p> <p>8 ways to, you know, regulate, you know, those</p> <p>9 feelings in more constructive ways.</p> <p>10 Q And you --</p> <p>11 A So I told her the same basic story that I</p> <p>12 told here.</p> <p>13 Q Okay. And you told her the same thing</p> <p>14 with respect to your impression of Ms. Heard's</p> <p>15 physical safety, as you testified today; is that</p> <p>16 right?</p> <p>17 A Yes. I think. I don't remember exactly</p> <p>18 what I told her, but I don't — you know, it's —</p> <p>19 I told her, essentially, what I've said today,</p> <p>20 yeah.</p> <p>21 Q Okay. Thank you.</p> <p>22 MR. PRESIADO: Brennan, if you could put</p>

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<p>265</p> <p>1 up what's marked as Exhibit 10, please. 2 (Document displayed.) 3 MR. PRESIADO: And if I could have 4 control. 5 THE TECHNICIAN: (Complies.) 6 BY MR. PRESIADO: 7 Q Okay. Again, Dr. Cowan, you were shown 8 this document earlier today, and I showed it to 9 you previously. I wanted to focus on your message 10 to Ms. Heard. It's dated November 8th, 2014, 11 10:11 p.m. 12 That's you texting to Ms. Heard; is that 13 right? 14 A Yes. 15 Q Okay. It says, "Amber, so sorry our time 16 together didn't go better." 17 And, there, you're speaking of the joint 18 session? 19 A That's correct. 20 Q Okay. "So much hurt and distrust in the 21 mix. Both sides. Just want to know -- just want 22 you to know that you didn't do anything to provoke</p>	<p>267</p> <p>1 can get together again. Not sure that he's ready 2 to do that at this point, even though it would be 3 helpful. It's very important for you to trust 4 yourself, be straight, and believe you're strong 5 enough to deal with what comes. It takes 10,000 6 truths to keep a house up, and only one lie to 7 bring it down." 8 Your reference to the "lie" there, is that 9 directed to Ms. Heard? 10 A Yes. 11 Q Okay. "Get your point on context totally, 12 but the only way to make sure he doesn't attach 13 fear and distrust to you is to be painfully 14 transparent." 15 At this point in time, based on this, I 16 get the impression that you did not believe that 17 she had been "painfully transparent" to him up to 18 this point; is that accurate? 19 MR. NADELHAFT: Objection to form, 20 foundation. 21 A If I can kind of describe what I think I'm 22 referring to here.</p>
<p>266</p> <p>1 him today. It's very hard for Johnny to stay on 2 the vulnerable side instead of armoring up." 3 Your assessment there is based on what you 4 had learned from Ms. Heard over the course of your 5 treatment of her; isn't that right? 6 A Yes. But he -- it's -- he didn't come in 7 feeling -- there was no sense of being vulnerable. 8 I mean, he came in angry. He came in, you know, 9 in a kind of defensive posture. So it was both. 10 You know, I'm assuming something that I have had 11 heard or learned, you know, over the period of 12 time from her, but also something I observed. 13 Q Okay. But that observation was for a 14 short period of time, correct? 15 A Yeah, it was just the half hour or so that 16 we were together. 17 Q Right. Okay. 18 "Hope he will stay in therapy and get the 19 skills to deal with his feelings more 20 constructively. He is hurt and will have to find 21 ways to heal him -- he will have to find ways to 22 heal himself. Maybe down the road the three of us</p>	<p>268</p> <p>1 Q Please. 2 A When anger -- when Amber was really 3 transparent with him, they would often get into 4 fights. So I think she had a -- some kind of a 5 pattern, and I don't know how often, but I think 6 that this occurred, of not mentioning something, 7 and then the truth coming out later, and she's 8 just kind of afraid to mention it, but in that she 9 didn't mention it, it got amplified, in terms of 10 importance, and he, Johnny, would react to it. 11 So what I was trying to tell her was, be 12 straight up with him. Tell him -- you know, put 13 everything out there. You're safer, the 14 relationship is cleaner, if you do that. That is 15 the point that I was making. 16 Q And you saw her conduct in that regard as 17 consistent through their relationship? 18 MR. NADELHAFT: Objection, vague. 19 BY MR. PRESIADO: 20 Q At least up to this point? 21 A Yeah. Essentially, I thought she -- you 22 know, when people are afraid of someone's</p>

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<p>269</p> <p>1 reaction, sometimes they, you know, they have 2 lies, very often, of omission, and then those 3 facts come out and they have to pay the 4 consequences, and I think there was some history 5 of that, yes.</p> <p>6 MR. PRESIADO: You can take that down 7 Brennan. Thank you.</p> <p>8 And if you could put up Exhibit 12, 9 please, Brennan and give me control. 10 (Document displayed.)</p> <p>11 BY MR. PRESIADO:</p> <p>12 Q And do you agree with me -- back to the 13 joint therapy session, do you agree with me, 14 Dr. Cowan, that it's common for one of the 15 participants in a relationship to be defensive 16 during couple's counseling?</p> <p>17 A Yeah, it's certainly not uncommon. Yeah.</p> <p>18 Q And don't you think it would be even more 19 common where, as in this case, you were treating 20 Ms. Heard, and Mr. Depp was coming in to meet you 21 for the first time, to be defensive?</p> <p>22 A That's a common occurrence, but, you know,</p>	<p>271</p> <p>1 Q Okay. Thank you.</p> <p>2 And I have up, now, what was previously 3 marked as Exhibit 12. And I'm sure you recall 4 this e-mail, it was from -- I'm sorry, Dr. Kipper, 5 to you, and describes the circumstances on the 6 flight to Australia; do you recall that?</p> <p>7 MR. NADELHAFT: Objection, I think it's 8 the flight to Japan.</p> <p>9 MR. PRESIADO: You're right. Thanks for 10 that clarification.</p> <p>11 THE WITNESS: Yes, sir. I'm not sure what 12 the question is.</p> <p>13 BY MR. PRESIADO:</p> <p>14 Q There isn't a question.</p> <p>15 A Oh.</p> <p>16 Q Let me ask the question. Sorry about 17 that.</p> <p>18 A Okay.</p> <p>19 Q I just wanted to get to this point here, 20 about, "She tried to push up the date of the 21 wedding to avoid all this, but the reality is he 22 will need a prenup."</p>
<p>270</p> <p>1 look, sometimes people will come -- some will 2 invite their partner in, you know, to discuss some 3 kind of issue or another, and they come in in a -- 4 in a receptive mood. It didn't -- he didn't come 5 in feeling receptive. He came in looking for 6 bear.</p> <p>7 Q Okay. But would you agree with me, 8 whether it's coming in -- in this context, coming 9 in either receptive to you, or coming in 10 defensive, that both are understandable?</p> <p>11 A Oh, yes, totally, yes.</p> <p>12 Q Okay. And you would have expected either, 13 right?</p> <p>14 A I didn't know what to anticipate. You 15 know, I know Amber wanted him to come in. I think 16 she was, you know, she certainly realized trust 17 was an important issue between the two of them, 18 and I suggested, you know, that -- and they had a 19 difficult time talking about that, and I 20 suggested, you know, that she bring him in, and 21 that, maybe, with the three of us, that we could, 22 you know, deal with that.</p>	<p>272</p> <p>1 And do you recall there's other documents 2 that you were asked about this morning with 3 respect to a prenup as between the two of them, 4 and Amber not wanting a prenup.</p> <p>5 Was that your impression?</p> <p>6 A My impression was that -- I know that 7 there were two lawyers working on an prenup. 8 Apparently, he didn't -- she said he fired -- or I 9 learned somehow that he fired her lawyer and they 10 didn't have a prenup.</p> <p>11 You know, very often, again, I don't 12 recall in detail, but, you know, look, I'm a big 13 believer in prenups because it's a -- they're 14 usually signed when people -- and this is what I 15 communicated to Amber. When, you know, people 16 sign them when they are caring about each other 17 and not in dispute, they tend to come up with 18 ways, ultimately, to dissolve the relationship in 19 a way that feels fair and equitable and dignified 20 and, essentially, civil and caring. And it's 21 better to have a clear [indiscernible] than later.</p> <p>22 But very often, you know, people are</p>

<p style="text-align: right;">273</p> <p>1 insulted by the notion of a prenup. I don't think 2 she was thrilled that he wanted a prenup, but she 3 understood why. 4 Q And that's what I'm asking: Was it your 5 general impression that she didn't want a prenup? 6 A As I recall, yeah, she was not — she 7 wasn't the one pushing for it, that's for sure. 8 Q And, in fact, I think I saw some documents 9 indicating that the whole idea of her entering 10 into a prenup and the prenup issue, caused her 11 anxiety, correct? 12 MR. NADELHAFT: Objection, misstates the 13 record. 14 A I don't know if I made a note to that 15 effect, that there was some discussion in that 16 regard. I don't see that here, but it — it would 17 be consistent. 18 Q His needed a prenup, causing her anxiety, 19 could be consistent with your recollection; is 20 that what you're saying? 21 A No, prenups cause everybody anxiety. 22 They're — they're anxiety invoking, you know, for</p>	<p style="text-align: right;">275</p> <p>1 They both got lawyers and there was some, you 2 know, paper traded back and forth, and ideas 3 traded back and forth, and then the whole thing 4 kind of blew up. Johnny got angry at — I guess 5 what was asked for on her side, is the only thing 6 I can assume, and fired her lawyer, and, for some 7 reason, and they impulsively, you know, ditched 8 the whole idea and got married. 9 Q Okay. Did you gain an impression of the 10 psychological effect the whole idea the prenup had 11 on Ms. Heard, such as exacerbating her sense of 12 abandonment, or anxiety, or anything in that 13 regard? 14 A No, no. I felt like it went into where a 15 prenup should go, into the background. I didn't 16 feel that was any kind of ongoing central issue or 17 source of conflict. 18 Q But the fact that it even came up in the 19 context of your therapy sessions with her, doesn't 20 that indicate that it did have some effect on her 21 psychologically? 22 MR. NADELHAFT: Objection. Speculation,</p>
<p style="text-align: right;">274</p> <p>1 people. They — it's like, you know, signing up 2 for, you know, what do you want to do when you 3 die, you know, and that kind of thing. So it's 4 depressing. So in the midst of kind of romantic 5 zeal, to have to deal with a prenup, is — you 6 know, it stirs up a lot of stuff. And I think 7 it's difficult for everyone, and I think it's 8 difficult for Amber as well. 9 MR. PRESIADO: One second, Dr. Cowan. 10 (Whereupon, a pause in the proceedings 11 occurred.) 12 MR. PRESIADO: Sorry about that 13 interruption. 14 Q With respect to the prenup, the prenuptial 15 agreement that Mr. Depp wanted Ms. Heard to enter 16 into, did you come to understand that that was an 17 important issue for her? 18 MR. NADELHAFT: Objection to the form, 19 misstates the testimony. 20 A No, my impression was that it was 21 something that was brought up by him. She got — 22 she understood why. She wasn't thrilled with it.</p>	<p style="text-align: right;">276</p> <p>1 misstates the testimony. 2 A Well, you know, again, I don't think she 3 wanted — 4 Q I'm sorry. You're frozen. Dr. Cowan, I'm 5 sorry. You froze during that response. 6 MR. PRESIADO: Madame reporter, did you 7 get any of that? 8 THE COURT REPORTER: He froze for me also. 9 "While, you know, again, I don't think she 10 wanted," that's what I got. 11 BY MR. PRESIADO: 12 Q Can you continue from there, Dr. Cowan, 13 please. 14 A Yeah, I just was saying, I don't think 15 that Amber, in any way, wanted the prenup, but I 16 think she understood why it was realistic. I 17 mean, you know she's an intelligent woman, and she 18 understood the, you know, the difference in, you 19 know, in income and money that was involved, so 20 she understood it. It was not something that 21 pleased her that he wanted, but she accepted it, 22 and it felt like it then became a nonissue. I</p>

<p>277</p> <p>1 mean, they had plenty of issues in their 2 relationship. We didn't talk a lot after that 3 about prenups. 4 Q Okay. But it was enough of an issue for 5 her psychologically and/or emotionally to bring it 6 up in your sessions; would you agree with that? 7 MR. NADELHAFT: Objection, asked and 8 answered. 9 A I can only assume from, you know, the 10 document that we discussed it, but it was not -- 11 it was not something that we focused on. It was 12 not a focus of hers. 13 Q Now, you saw that -- 14 MR. PRESIADO: I'm sorry. Brennan, if you 15 could put up that last exhibit. 16 (Document displayed.) 17 Well, I don't think we need -- yeah, go 18 ahead. 19 BY MR. PRESIADO: 20 Q Now, again, this description by 21 Dr. Kipper, with respect to that plane ride and 22 indication that Ms. Heard attempted to leave the</p>	<p>279</p> <p>1 Can we take another 15; are you okay with that? 2 MR. NADELHAFT: Yeah, that's fine. 3 MR. PRESIADO: So we'll come back at 4 10 till the hour. 5 MR. NADELHAFT: Okay. 6 THE VIDEOGRAPHER: Going off the record at 7 1935. 8 (A recess was taken.) 9 THE VIDEOGRAPHER: We are back on the 10 record at 1945. 11 BY MR. PRESIADO: 12 Q Mr. Cowan, I want to focus on something 13 you testified to earlier. Do you recall that 14 there was an incident in Australia and Mr. Depp 15 cut his finger? 16 A Yes. 17 Q Okay. And you testified earlier that, as 18 part of that incident, you understood that 19 Ms. Heard had thrown bottles; is that right? 20 MR. NADELHAFT: Objection, misstates the 21 testimony. 22 A I know there was a bottle, and it was</p>
<p>278</p> <p>1 plane while they were over the ocean, would you 2 agree with me that that's extreme conduct? 3 A Yes. 4 Q Okay. 5 A That's very extreme. 6 Q Would you say it's manic? 7 MR. NADELHAFT: Objection, form, 8 speculation. 9 A It -- it's more impulsive than manic. I 10 mean, it's -- it's -- it's, you know, some -- I 11 don't even know what that refers to. I mean, 12 somebody can -- if she got up and went and pulled 13 on the door -- I don't know what he's referring to 14 here. I, obviously, wasn't there. 15 Q But as described, would you at least say 16 it's fair she reacted? 17 A Yeah. If she did that, it would be 18 incredibly reactive, yes. 19 Q Okay. 20 MR. PRESIADO: You can take that down, 21 Brennan. Thanks. 22 We've been going for another hour or so.</p>	<p>280</p> <p>1 thrown and broken. I don't know who threw it. 2 Q Okay. Did you -- was it your 3 understanding that Mr. Depp's injury was as a 4 result of the thrown bottle? 5 A I'm -- as I recall, that's how he cut his 6 finger. 7 Q Okay. So does that refresh your 8 recollection that his finger was, in fact, cut by 9 a thrown bottle, that you had an understanding 10 that Ms. Heard had thrown that bottle? 11 MR. NADELHAFT: Objection, misstates the 12 testimony, speculation form, foundation. 13 A I don't recall who threw the bottle. 14 Q Okay. 15 A I just remember there was a bottle thrown. 16 She may have thrown it, he may have thrown it; I 17 don't recall. 18 Q Okay. 19 MR. PRESIADO: Brennan, if you could put 20 up what I sent you as Exhibit 1, page 7, Cowan 7. 21 (Document displayed.) 22 BY MR. PRESIADO:</p>

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281	1 Q And these are your notes, correct, 2 Dr. Cowan? 3 A That's correct. 4 Q Okay. And I just want to direct your 5 attention to what you wrote here -- let me see 6 where it is. 7 (Whereupon, a pause in the proceedings 8 occurred.) 9 MR. NADELHAFT: Just to be clear, is this 10 an exhibit? I'm sorry to interrupt, but is this 11 being marked as an exhibit? 12 MR. PRESIADO: It already had has been. 13 MR. NADELHAFT: Oh. 14 MR. PRESIADO: I found it. 15 BY MR. PRESIADO: 16 Q Dr. Cowan, you write here -- and let me 17 know if I'm reading this correctly. "Also -- 18 actually, do you see my cursor here, "Also"? 19 A Yes. 20 Q Can you read that sentence through the, 21 "daughter." 22 A Yes. "Also plan to explore her feelings	283	1 why you wrote that, why you would want to ask her 2 about that relationship? 3 A No. I also planned to "explore" -- I 4 don't recall why I wanted to do that. I must have 5 been something -- there must have been something 6 that came up that would have prompted me to write 7 that down, but I don't know -- I don't remember 8 what it was. 9 Q And you did mention conflict between 10 Ms. Heard and Mr. Depp's sister; is that right? 11 A That's correct. 12 Q And what was your understanding of that 13 conflict? 14 A My understanding of that conflict was that 15 Johnny's sister didn't approve of his relationship 16 with Amber. Didn't particularly care for her. 17 And, from Amber's point of view, would -- was very 18 kind of controlling of Johnny, and her controlling 19 of Johnny then was threatening to Amber, like 20 another woman being involved in the relationship. 21 And so they had issues. 22 And I think this all came to a head when
282	1 about JD and his daughter." 2 Q What was the issue with respect to 3 Ms. Heard and Mr. Depp's daughter? 4 A You know, I'm not sure what I was 5 referring to here. You know, I mean, Amber, 6 obviously, had a relationship with both of his 7 children, but I don't -- I don't know why I made 8 this particular note. I don't recall. 9 Q Do you recall there being any conflict 10 between Ms. Heard and Mr. Depp's daughter? 11 A No. The conflict I remember, the family 12 conflict, was between Amber and Johnny's sister, 13 who was very involved in their lives. But I don't 14 recall any specific conflict with his daughter. 15 Q Okay. Do you remember anything that 16 Ms. Heard said with respect to Mr. Depp's 17 daughter? 18 A No, I don't. I mean, you know, I remember 19 her saying they had gone shopping, you know, so I 20 know that she had contact with his daughter, but I 21 don't remember there being any conflict. 22 Q So as you sit here today, you don't know	284	1 this woman, that Amber didn't feel approved of by, 2 and was so important to Johnny emotionally and 3 involved in a lot of the details in his life, you 4 know, was the one who was planning their wedding. 5 So it was a kind of an odd situation. 6 Q So would you say that the relationship 7 between Ms. Heard and Mr. Depp's sister was a 8 source of anxiety for Ms. Heard? 9 A Yeah. I think that's a fair 10 characterization. 11 Q Okay. 12 MR. PRESIADO: You can take this down, 13 Brennan. 14 Actually, it's the same document. I just 15 want to go to page 9. I'll take control. 16 I do have control, thanks. 17 BY MR. PRESIADO: 18 Q And this page, marked as Cowan 9, these 19 are your notes, right, Dr. Cowan? 20 A Yes, they are. 21 Q And -- and, in here, you say that 22 Ms. Heard tends to be -- tends toward being

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<p>285</p> <p>1 "reactive." 2 What do you mean by that? 3 A Well, I'm trying to figure out where you 4 were in the document. 5 Q I thought you saw it. I thought I was on 6 it. Okay. Maybe if you see it, Dr. Cowan, I'm 7 having trouble. 8 MS. CALNAN: "Clearly." 9 MR. PRESIADO: I'm sorry? 10 MS. CALNAN: The part, "Clearly." 11 MR. PRESIADO: Stephanie, you're a little 12 jumbled. 13 THE WITNESS: "Clearly, when she is hurt, 14 she is quick to throw the first blow." 15 I meant that, yeah, I think, more 16 metaphorically than physically. She had a temper, 17 and I think that it flared, you know, with some 18 regularity, as did his. 19 BY MR. PRESIADO: 20 Q Okay. So when you say, here, "Clearly, 21 when she is hurt," "she" is Ms. Heard; is that 22 right?</p>	<p>287</p> <p>1 Q And so you're indicating there that, when 2 she is hurt, she would often initiate a fight with 3 Mr. Depp; is that what you mean by the "throw the 4 first blow"? 5 MR. NADELHAFT: Objection, misstates the 6 record. 7 A No. When I said, you know, "when she is 8 hurt, she is quick to throw the first blow," 9 again, I didn't mean that with her fist. 10 Q Oh, I know. I know. 11 What I'm asking you, Dr. Cowan, is that, 12 this indicates that she, in particular 13 circumstances, specifically when she was hurt, she 14 would often start the fight? 15 Is that what you meant by -- 16 A Well, when you're hurt, the fight is 17 already begun. When somebody does something to 18 hurt you, the fight has begun. And when she felt 19 hurt, then she would continue the fight. She 20 couldn't stay with feeling hurt. She couldn't 21 talk about being hurt. She would get into angry 22 mode and try to protect herself with the anger.</p>
<p>286</p> <p>1 A Yeah, she's hurt. 2 Q "She is quick the throw the first blow"? 3 A Yeah. 4 Q Okay. And that's based on your 5 discussions with her at this session? 6 A It was this session, but it was -- again, 7 I was making these notes and really process notes 8 for where she was emotionally. I mean, how -- 9 these were never meant to be, you know, documents 10 or to be seen by anybody. 11 What I was alluding to here is that it's 12 very difficult for her to distinguish between hurt 13 and anger, and when she is hurt, she goes into a 14 protective mode, and the way she protects herself 15 is with anger. So what I was trying to get her to 16 stay with, when she was feeling hurt, was to 17 experience that kind of feeling without having to, 18 you know, put up her dukes and, you know -- and 19 then, you know, argue, yell, fight, and, you know, 20 express anger. 21 So I was trying to help her regulate, you 22 know, and manage her anger.</p>	<p>288</p> <p>1 I mean, anger is a protective emotion. 2 It's the way we protect our dignity, but anger, 3 very often, is a cover for hurt. So when you talk 4 to people who are angry, what's underneath the 5 anger always is hurt, and it was hard for her to 6 stay with feeling and being vulnerable, because it 7 felt unsafe to be vulnerable. 8 MR. PRESIADO: Okay. Brennan, you can 9 take that down. 10 If you can put up what I sent you as 11 Exhibit 3, and, in particular, page 44. 12 (Whereupon, the above-referenced document 13 was marked as Exhibit No. 31.) 14 (Document displayed.) 15 MR. NADELHAFT: So is this a 20-page 16 exhibit document? 17 MR. PRESIADO: Yeah, it may be. It's -- 18 we divided what Dr. Cowan produced into three 19 exhibits. 20 MR. NADELHAFT: Okay. 21 MR. PRESIADO: And page 44. 22 BY MR. PRESIADO:</p>

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73 (289 to 292)

289	1 Q Mr. -- Dr. Cowan, did you draft this 2 document, is this your document? 3 A Yes, it is. 4 Q You wrote this, in other words? 5 A Yes. 6 Q And it's dated March 14th, 2015; is that 7 right? 8 A Yes. 9 MR. NADELHAFT: And I'm just going to -- 10 BY MR. PRESIADO: 11 Q Is that to yourself, these records? 12 MR. NADELHAFT: You're talking about one 13 page, when you're talking about this 20-page 14 exhibit, correct? 15 MR. PRESIADO: Right. I'm just talking 16 about page 44. 17 MR. NADELHAFT: Okay. 18 MR. PRESIADO: Cowan 44. 19 MR. NADELHAFT: Go ahead. 20 BY MR. PRESIADO: 21 Q You wrote this to yourself; is that right? 22 A Yeah.	291	1 flagged in the most important intimate 2 relationships that people have. And she had that 3 kind of an detachment to Johnny. It was not -- it 4 didn't feel safe to her. So when they were apart, 5 all of those issues got amplified. That that -- 6 that their relationship, in fact, wasn't safe, 7 and, you know, codependency is just about the kind 8 of emotional dependency people form in their 9 emotional bonds. 10 And there's a healthy aspect to being 11 dependent. You know, we do depend on those people 12 that we love and who love us. When it's 13 amplified, when we feel unsafe, you know, being 14 alone, you know, being autonomous, then those kind 15 of dependency feelings become amplified. 16 And these kinds of issues that I was just 17 reminding myself, that were going on when she 18 would separate from him. 19 Q And, then, at the end here, you say, 20 "Despite all efforts, she continues to be unable 21 to effectively regulate her emotions." 22 Did I read that correctly?
290	1 Q It says, "Amber and J." 2 Is that referring to Mr. Depp? 3 A It is. 4 Q "Have been apart which brings up all of 5 A's" -- does that refer to Ms. Heard? 6 A Yes. 7 Q -- "issues around attachment, 8 codependency, and abandonment." 9 What did you mean by that? Is it common 10 -- let me just ask you: What did you mean by 11 that? 12 A What I meant was that being separate, 13 being alone, brought these kinds of issues, you 14 know around -- I mean, "attachment," what I mean 15 by "attachment," is the kind of most primary 16 relationship we have is usually with mom, and the 17 that kind of bond, if it's secure and nurturing, 18 and easy, and safe, people, you know, they form 19 secure attachments. 20 When that bond is anxious and insecure, 21 they develop insecure, anxious, attachments. And 22 those -- those styles of attachment all get	292	1 A You did. 2 Q And was that your impression during the 3 entire course of your treatment of her? 4 A Yeah. Pretty much so. I mean, you know, 5 I think that, again, at the end, when they were 6 not together, I think that it was easier for her 7 to do that; but during the time I was seeing her, 8 she was -- that was a struggle for her. 9 MR. PRESIADO: Okay. I don't have 10 anything further, but I do reserve time, Adam, if 11 you intend to further your examination. 12 MR. NADELHAFT: I do. I understand. Let 13 me -- can we take 10 minutes so just so I can get 14 myself -- 15 MR. PRESIADO: Sure. 16 MR. NADELHAFT: Yeah. Why don't we just 17 do 5:15 your time, 8:15 Eastern. 18 THE VIDEOGRAPHER: We are going off the 19 record at 2003. 20 (A recess was taken.) 21 THE VIDEOGRAPHER: We are back on the 22 record at 2013.

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293	1 EXAMINATION 2 BY MR. ADAM S. NADELHAFT: 3 Q Dr. Cowan, Adam Nadelhaft, again, for 4 Amber Heard. 5 MR. NADELHAFT: Brennan, can you put up 6 Heard 50. 7 (Whereupon, the above-referenced document 8 was marked as Exhibit No. 32.) 9 (Documents displayed.) 10 BY MR. NADELHAFT: 11 Q Dr. Cowan, this is Exhibit Cowan 32. I 12 believe you've seen these documents, this document 13 before. This is your psychotherapy progress notes 14 for December 17th, 2015, correct? 15 A That's correct. 16 Q And you keep these documents in the normal 17 course of business, correct? 18 A Yeah. 19 Q And if we go down the page, do you see 20 where it says -- it says, "Some spark ignited an 21 argument that escalated and got violent. Shoving 22 and screaming. Amber related that he started the	295	1 with her on her psychological well-being, correct? 2 A That's correct. 3 Q Okay. And at this time -- okay. Strike 4 that. 5 At this time -- well, let me ask you this 6 way: Do you have any reason to believe, in any of 7 your meetings with Amber, that she had any reason 8 to not be truthful with you? 9 A No, I don't. 10 MR. PRESIADO: Objection, calls for 11 speculation, foundation, overbroad. 12 BY MR. NADELHAFT: 13 Q As you understood your consultation, your 14 meetings with her, these were private 15 consultations that would not be seen by anybody, 16 correct? 17 A That's correct. 18 Q All right. Okay. And, as of 19 December 17th, 2015, Amber was still trying to 20 make her relationship with Mr. Depp work, correct? 21 MR. PRESIADO: Objection, lacks 22 foundation, calls for speculation.
294	1 physicality." 2 "He," is Mr. Depp, correct? 3 A That's correct. 4 Q And you wrote these notes? 5 A Yeah. 6 Q And were it says, "pushed her down," 7 that's indicating Mr. Depp pushed Amber down? 8 A That's correct. 9 Q And then you wrote, "Amber got back up." 10 A Yes. 11 Q And this was a meeting in your office on 12 December 17th, 2015; is that right? 13 A That's correct. 14 Q Do you recall if Amber was wearing any 15 makeup at the time when you met with her? 16 A I don't recall whether she was or was not. 17 Q When you -- when you met with Amber at any 18 of your meetings, were you ever doing a physical 19 examination to determine if she had bruises or 20 cuts or anything on her body? 21 A No. 22 Q Okay. You were only -- you were working	296	1 A That was certainly my impression, yes. 2 MR. NADELHAFT: Okay. We can take this 3 down. 4 Can you put up Heard 477. 5 (Whereupon, the above-referenced document 6 was marked as Exhibit No. 33.) 7 (Document displayed.) 8 BY MR. NADELHAFT: 9 Q And this exhibit is Cowan 33. I believe 10 we saw this before. And if you go down to the 11 bottom of the page, this is your handwriting? 12 A It is. 13 Q And these notes are from your records, 14 correct? 15 A Yes. 16 Q And you were referring to a text that you 17 received from Amber, correct? 18 A Yes. 19 Q And you wrote, "This is obviously a toxic 20 and destructive relationship"; is that right? 21 A Yes. 22 Q And that was your understanding of the

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297	<p>1 relationship between Amber and Mr. Depp, that it 2 was "toxic and destructive"? 3 A Yes. 4 Q And you write, "Amber understands how 5 damaging the relationship is and still refuses to 6 move on." 7 You wrote that, correct? 8 A I did. 9 Q And that's not atypical for patients who 10 are abused, to refuse to move on from a 11 relationship, correct? 12 MR. PRESIADO: Objection, lacks 13 foundation, calls for speculation. 14 A No, it's not. 15 Q Okay. Thank you. 16 MR. NADELHAFT: We can take that down. 17 Can you put up Heard 48, please. 18 (Whereupon, the above-referenced document 19 was marked as Exhibit No. 34.) 20 (Document displayed.) 21 BY MR. NADELHAFT: 22 Q Dr. Cowan, I'm showing what has been</p>	299	<p>1 A I did. 2 Q And those notes are referring to Mr. Depp, 3 correct? 4 A They are. 5 Q And of Mr. Depp's jealousy of people -- of 6 men with Ms. Heard, correct? 7 A That's correct. 8 Q And Mr. Depp feeling threatened by Amber's 9 work, correct? 10 A Yes. 11 Q And Mr. Depp doing whatever drugs he 12 chooses to use, correct? 13 A Yes. 14 MR. NADELHAFT: We can take that down. 15 And can you put up Heard 49, please. 16 (Whereupon, the above-referenced document 17 was marked as Exhibit No. 35.) 18 (Document displayed.) 19 BY MR. NADELHAFT: 20 Q And, Dr. Cowan, I'm showing you what's 21 been marked as Cowan Exhibit 35. These are notes 22 from you, from your file, correct?</p>
298	<p>1 marked as Cowan 34. These are psychotherapy 2 progress notes from Amber Heard, from 3 January 13th, 2015, correct? 4 A Yes. 5 Q And these are your notes, correct? 6 A Correct. 7 Q And this is your handwriting? 8 A It is. 9 Q And the, "Mood/Affect," you said that 10 Amber was, "anxious," and, "sad." 11 A Yes. 12 Q And if we go down, you say, "Amber sees 13 clearly all the built-in difficulties in this 14 relationship." 15 You wrote that? 16 A I did. 17 Q Okay. And then it talks about, "jealousy, 18 feeling threatened by her work, wanting to do 19 whatever drugs he chooses to use, wanting to spend 20 time at the studio doing music and his band, 21 et cetera." 22 You wrote that, correct?</p>	300	<p>1 A Yes, they are. 2 Q Of June 7th, 2016, correct? 3 A Yes. 4 Q Okay. And if we go down on the page a 5 little bit. You say you haven't seen Amber since 6 March 16th, correct? 7 A Yes. 8 Q Did Amber ever tell you that she couldn't 9 afford your services anymore? 10 A I believe she did, yes; and I told her 11 that I, you know, would be, you know, willing to, 12 you know, continue seeing her, you know, at some 13 reduced rate if she couldn't afford it, but it was 14 an issue. Money became an issue. 15 Q Okay. And, in these notes, you write, 16 "During these months Amber has been in therapy, we 17 have picked through the permanent and" -- what is 18 that word? 19 A Stationary. 20 Q -- "stationary unhealthy elements in her 21 relationship with JD," meaning Johnny Depp, 22 correct?</p>

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<p>301</p> <p>1 A Yes.</p> <p>2 Q And then you write, "his controlling</p> <p>3 nature, jealousy and suspiciousness, addiction to</p> <p>4 drugs and alcohol, and violent and indulgent</p> <p>5 temper."</p> <p>6 You wrote that, correct?</p> <p>7 A I did.</p> <p>8 Q Okay. And what does it -- down, it says,</p> <p>9 "Her finally acknowledging the toxicity is a</p> <p>10 healthy move on her part," correct?</p> <p>11 A Yes.</p> <p>12 Q "Despite all the --</p> <p>13 MR. NADELHAFT: Scroll down a little bit.</p> <p>14 Not too much.</p> <p>15 Go up.</p> <p>16 THE WITNESS: Despite all the storm and</p> <p>17 drum that has accompanied the filing."</p> <p>18 BY MR. NADELHAFT:</p> <p>19 Q And you wrote that, correct?</p> <p>20 A I did.</p> <p>21 Q Okay. And if we go to the second page,</p> <p>22 you did -- you mentioned in these notes that Amber</p>	<p>303</p> <p>1 Do you see where it says, "fight over</p> <p>2 using (his)."</p> <p>3 A Yes.</p> <p>4 Q That -- do you think that's referring to</p> <p>5 Mr. Depp, or Amber's father?</p> <p>6 A I'm assuming it's referring to Mr. Depp,</p> <p>7 and -- and then it was with reference to something</p> <p>8 that she said about her father's drug abuse, and</p> <p>9 when her father was using, she would be kind of at</p> <p>10 effect of at risk of abusive behavior, and this is</p> <p>11 why it was such a sensitive, maybe overly</p> <p>12 sensitive, issue for Amber that if Johnny is</p> <p>13 using.</p> <p>14 Q And so I just want to make sure. In the</p> <p>15 morning you said, "I always got the brunt of" --</p> <p>16 you said it was, "J's abuse," and now you think it</p> <p>17 may be, "Fs abuse."</p> <p>18 Are you sure which one it is?</p> <p>19 A I'm pretty sure that what I mean here is</p> <p>20 that the two of them had some fight over his using</p> <p>21 something, and her telling me, you know, how angry</p> <p>22 it made her. And that she was the one in the</p>
<p>302</p> <p>1 was considering filing a domestic violence</p> <p>2 complaint, correct?</p> <p>3 A You know, it must have come up, or I</p> <p>4 wouldn't have made that note of it.</p> <p>5 Q Okay. And you didn't tell her not to file</p> <p>6 a domestic violence complaint, correct?</p> <p>7 MR. PRESIADO: Objection, asked and</p> <p>8 answered.</p> <p>9 BY MR. NADELHAFT:</p> <p>10 Q You can answer.</p> <p>11 A No, I didn't. No, I did not.</p> <p>12 MR. NADELHAFT: Would you put back up</p> <p>13 Exhibit 30 for a minute.</p> <p>14 (Document displayed.)</p> <p>15 MR. NADELHAFT: Go down a page -- keep</p> <p>16 going.</p> <p>17 Keep going. Okay.</p> <p>18 BY MR. NADELHAFT:</p> <p>19 Q Okay. At the bottom of this page. We had</p> <p>20 talked about -- you talked about this with me this</p> <p>21 morning, and then you talked about this later</p> <p>22 today with Leo.</p>	<p>304</p> <p>1 family who got the biggest, you know, the brunt of</p> <p>2 her father's anger when he was using.</p> <p>3 Q And Amber -- Mr. Depp was like Amber's</p> <p>4 father to Amber, correct?</p> <p>5 MR. PRESIADO: Objection, lacks</p> <p>6 foundation, calls for speculation, outside the</p> <p>7 scope of the deponent's knowledge.</p> <p>8 BY MR. NADELHAFT:</p> <p>9 Q In working with her, you saw her as</p> <p>10 looking at Mr. Depp and his drug use as similar to</p> <p>11 what she had experienced with her father, correct?</p> <p>12 MR. PRESIADO: Objection, misstate</p> <p>13 testimony, assumes facts not in evidence, lacks</p> <p>14 foundation.</p> <p>15 A I didn't think that they had a</p> <p>16 father/daughter relationship. I think there were</p> <p>17 things that happened in her relationship with</p> <p>18 Johnny that reminded of -- that reminded her of</p> <p>19 early family conflict and struggles that she had</p> <p>20 had and things that she had witnessed. So it</p> <p>21 brought up her father and what he was like.</p> <p>22 Q And what were those things that Mr. Depp</p>

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<p>305</p> <p>1 did that brought up the early conflict that Amber 2 experienced? 3 A I think it was around the drug use. You 4 know, Amber's father used drugs, and Amber was 5 very upset, and she was concerned about Johnny's 6 health. She was concerned about the impact of his 7 using, you know, drugs, whether -- you know, 8 whatever it was, that -- the impact that it has on 9 their relationship, and it was a trigger for her. 10 It was an emotional trigger for her. 11 So if she saw him doing something, or he 12 seemed not to be sober, it made her anxious and 13 upset, and when she was anxious and upset, she 14 would get angry. 15 Q Did Amber's relationship with Mr. Depp 16 contribute significantly to her anxiety and 17 depression? 18 MR. PRESIADO: Objection, lacks foundation 19 and calls for speculation. 20 A It certainly didn't help. I don't know 21 what Amber would have been like had she not had 22 that relationship and gone through those</p>	<p>307</p> <p>1 August 13th, 2014 -- 2 A Yes. 3 Q -- Dr. Cowan? 4 And this is your handwriting? 5 A It is. 6 Q Okay. And do you see where it says, "JD," 7 at the bottom, "is very threatened by career, 8 particularly any kind of romantic scenes she has." 9 Do you see that? 10 A Yes. 11 Q And, then, you wrote that? 12 A I did. 13 Q And do you see where it says, "She has to 14 do her movie with JF" -- what does that say? 15 A Precipitated. 16 Q -- "precipitated binge to put JD in the 17 hospital." 18 And you understand "JF" to be 19 James Franco? 20 A Yes. 21 MR. NADELHAFT: You can take that down. 22 BY MR. NADELHAFT:</p>
<p>306</p> <p>1 experiences, but the experiences she had with him, 2 I think, amplified her anxiety and made it more, 3 much more difficult for her to control her 4 emotions in an effective way. 5 Q And she was less anxious and depressed 6 after she divorced Mr. Depp, correct? 7 A Yeah. 8 MR. PRESIADO: Objection, misstates 9 testimony, assumes facts not in evidence, calls 10 for speculation, lacks foundation. 11 BY MR. NADELHAFT: 12 Q You said, "Yes?" 13 A "Yes." I only saw her for a short time, 14 but she seemed much clearer and calmer. 15 MR. NADELHAFT: Okay. Can you put up 16 Heard 39, please. 17 (Whereupon, the above-referenced document 18 was marked as Exhibit No. 36.) 19 (Document displayed.) 20 BY MR. NADELHAFT: 21 Q And this is Cowan Exhibit 36, and you 22 recognize these notes as notes from</p>	<p>308</p> <p>1 Q In your sessions with Ms. Heard, do you 2 know how many of your sessions were either by 3 phone or Viber, versus in person? 4 A I'd have to look through and see. You 5 know, most of them were in person, but, you know, 6 when she was out of the town, we did do sessions 7 by phone. 8 MR. NADELHAFT: Could you put up Heard 40. 9 (Whereupon, the above-referenced document 10 was marked as Exhibit No. 37.) 11 (Document displayed.) 12 BY MR. NADELHAFT: 13 Q Dr. Cowan, I'm showing what you what's 14 been marked as Cowan 37. These are your notes 15 from September 15th, 2014, correct? 16 A It is. 17 Q And this is your handwriting, correct? 18 A It is. 19 Q Okay. And if we go down a bit, do you see 20 where it says -- 21 MR. NADELHAFT: Oh, go up a little bit. 22 Go up.</p>

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<p>309</p> <p>1 BY MR. NADELHAFT:</p> <p>2 Q Where it says, "She did report" -- "she,"</p> <p>3 being Amber, correct?</p> <p>4 A Yes.</p> <p>5 Q -- "that she is concerned about his Xanax</p> <p>6 usage." "His" Xanax usage," being Mr. Depp's,</p> <p>7 correct?</p> <p>8 A Yes.</p> <p>9 Q And then you wrote, "Has a history of</p> <p>10 Xanax" -- and what's the next word?</p> <p>11 A "Ativan."</p> <p>12 Q -- "Ativan and Klonopin abuse"?</p> <p>13 A "Klonopin."</p> <p>14 Q Okay. And that causes a personality</p> <p>15 change?</p> <p>16 A It can.</p> <p>17 Q Okay. But Amber was telling you that it</p> <p>18 caused a personality change in Mr. Depp, correct?</p> <p>19 A Yes, she did.</p> <p>20 Q And Amber, then you write, "A," meaning</p> <p>21 Amber, "is afraid this may happen again," correct?</p> <p>22 A Yes.</p>	<p>311</p> <p>1 Q And probably drinking, right?</p> <p>2 A Yes.</p> <p>3 Q And these are notes of the joint session</p> <p>4 that you had with Mr. Depp and Amber, correct?</p> <p>5 A I'm not sure exactly what the sequence</p> <p>6 was, where this is in reference to the joint</p> <p>7 session.</p> <p>8 Q Okay. Do you see at the bottom, it says,</p> <p>9 "joint session A/JD."</p> <p>10 That means joint session with Amber and</p> <p>11 Johnny Depp?</p> <p>12 A Yes.</p> <p>13 Q And you wrote, "He was very provocative</p> <p>14 and angry with her," correct?</p> <p>15 A Yes.</p> <p>16 Q And that was your impression of Mr. Depp,</p> <p>17 correct?</p> <p>18 A It was.</p> <p>19 Q And you wrote, "Unproductive and he</p> <p>20 aborted the session."</p> <p>21 "He," being Mr. Depp, correct?</p> <p>22 A Correct.</p>
<p>310</p> <p>1 MR. NADELHAFT: Okay. We can take that</p> <p>2 down.</p> <p>3 If you can put up Heard 41.</p> <p>4 (Whereupon, the above-referenced document</p> <p>5 was marked as Exhibit No. 38.)</p> <p>6 (Document displayed.)</p> <p>7 BY MR. NADELHAFT:</p> <p>8 Q And, Dr. Cowan, Exhibit Cowan 38 is your</p> <p>9 notes from November 8th, 2014, correct?</p> <p>10 A Yes.</p> <p>11 Q And this is your handwriting, correct?</p> <p>12 A Yes.</p> <p>13 Q And you wrote, "anxious," and, "unstable,"</p> <p>14 where it says, "Mood/Affect," correct?</p> <p>15 A Yes.</p> <p>16 Q Okay. And, if you go down, it says,</p> <p>17 "Exchanged texts with Amber, on 11/7, telling her</p> <p>18 that J had broken up with her," correct?</p> <p>19 A Yes.</p> <p>20 Q And we had seen that text before, where</p> <p>21 Amber reported that Mr. Depp was manic, correct?</p> <p>22 A Yes.</p>	<p>312</p> <p>1 Q Okay. And the session being</p> <p>2 "unproductive," was your evaluation of what</p> <p>3 happened at the session, correct?</p> <p>4 A Correct.</p> <p>5 Q And Mr. Depp was angry and -- basically,</p> <p>6 upon arrival to the joint session, correct?</p> <p>7 A Yes. He seemed to be.</p> <p>8 Q All right. Okay.</p> <p>9 MR. NADELHAFT: If you can put up</p> <p>10 Heard 42.</p> <p>11 (Whereupon, the above-referenced document</p> <p>12 was marked as Exhibit No. 39.)</p> <p>13 (Document displayed.)</p> <p>14 BY MR. NADELHAFT:</p> <p>15 Q Dr. Cowan, I'm showing you that's been</p> <p>16 marked as Cowan 39. These are your notes from</p> <p>17 February 24, 2015, correct?</p> <p>18 A Yes.</p> <p>19 Q Okay. And this is your handwriting,</p> <p>20 correct?</p> <p>21 A Yes.</p> <p>22 Q And where it says, "Mood/Affect," you</p>

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313	<p>1 wrote, "anxious"?</p> <p>2 A I did.</p> <p>3 Q And that's referring to Amber, correct?</p> <p>4 A Correct.</p> <p>5 Q Okay. And if we go down, it says,</p> <p>6 "Apparently, J fired Amber's prenup lawyer and</p> <p>7 they got married, without one, on the island</p> <p>8 property of J's," meaning Johnny, correct?</p> <p>9 A Yes.</p> <p>10 Q So it's your understanding that Mr. Depp</p> <p>11 fired Amber's lawyer; is that right?</p> <p>12 MR. PRESIADO: Objection, calls for</p> <p>13 speculation, lacks foundation.</p> <p>14 A That's what she told me.</p> <p>15 Q Okay. And, then, you write, "I think this</p> <p>16 is just a slow-moving crash," correct?</p> <p>17 A Yes.</p> <p>18 Q And you're referring to Amber and</p> <p>19 Mr. Depp's relationship, correct?</p> <p>20 A Yes. I did not think it was sustainable.</p> <p>21 Q And you write, "Issues of sobriety and</p> <p>22 trust have yet to be resolved," correct?</p>	315	<p>1 (Document displayed.)</p> <p>2 BY MR. NADELHAFT:</p> <p>3 Q Dr. Cowan, I'm showing you what's been</p> <p>4 marked as Cowan Exhibit 40. Those are your notes</p> <p>5 from July 8th, 2015, correct?</p> <p>6 A Yes.</p> <p>7 Q Okay. And if you move down the notes, you</p> <p>8 wrote -- this was -- you, "Had a phone conference</p> <p>9 with Amber," correct?</p> <p>10 A Yes.</p> <p>11 Q She's still -- what do you write here?</p> <p>12 A Had a phone conversation with Amber</p> <p>13 tonight. She's still not square yet with JD,</p> <p>14 Johnny Depp. The relationship continues to cycle</p> <p>15 through typical conflict. One chronic issue is</p> <p>16 Johnny's continued drug abuse.</p> <p>17 Q Okay. Keep going, that's fine.</p> <p>18 A It's aggravated by moodiness and stress on</p> <p>19 both sides, and making efforts to keep Amber as</p> <p>20 calm as possible."</p> <p>21 Q So as of July 8th, 2015, there was -- one</p> <p>22 continued issue was Mr. Depp's continued drug</p>
314	<p>1 A "Not been," had, "not been resolved."</p> <p>2 Q "Not been resolved."</p> <p>3 "And issues of sobriety and trust," were</p> <p>4 issues of Mr. Depp, correct?</p> <p>5 A Well, they were -- look "issues of trust,"</p> <p>6 I think they both have issues of trust. "Issues</p> <p>7 of sobriety," were issues of Mr. Depp.</p> <p>8 Q Okay. And then you wrote --</p> <p>9 A This is all from Amber's point of view.</p> <p>10 Q Right. And when you wrote, "Toxic</p> <p>11 situation," was that from Amber's point of view,</p> <p>12 or your point of view?</p> <p>13 A That was my assessment of their</p> <p>14 relationship, that it was toxic. They triggered</p> <p>15 each other. You know, I didn't think it was</p> <p>16 sustainable. You know, I was never a proponent of</p> <p>17 maintaining this relationship because it felt</p> <p>18 toxic and it didn't feel healthy.</p> <p>19 MR. NADELHAFT: If you could put up</p> <p>20 Heard 45.</p> <p>21 (Whereupon, the above-referenced document</p> <p>22 was marked as Exhibit No. 40.)</p>	316	<p>1 abuse in the relationship, correct?</p> <p>2 MR. PRESIADO: Objection, lacks</p> <p>3 foundation, calls for speculation.</p> <p>4 A Yeah.</p> <p>5 Q Okay. Now, you mentioned before in</p> <p>6 questioning --</p> <p>7 MR. NADELHAFT: You can take this exhibit</p> <p>8 down.</p> <p>9 Q -- that when Amber was transparent with</p> <p>10 Mr. Depp, he got angry, correct?</p> <p>11 A Well --</p> <p>12 MR. PRESIADO: Objection, misstates</p> <p>13 testimony.</p> <p>14 A -- yeah. I don't mean that as a blanket</p> <p>15 statement, but I think that -- I encouraged her to</p> <p>16 be transparent. I encouraged her to, you know,</p> <p>17 leave everything as clear and transparent as</p> <p>18 possible, because I thought that was the best way</p> <p>19 of her proceeding in this relationship.</p> <p>20 I think she felt that it was dangerous at</p> <p>21 times, "dangerous," meaning that it would provoke</p> <p>22 a fight. That, if she brought up something that,</p>

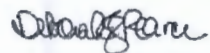
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<p>317</p> <p>1 from her point of view, was threatening to him, or 2 it might be threatening to him, I encouraged her 3 to, you know, talk about these things anyway, so 4 that -- with the belief that her transparency 5 would result in greater trust in the relationship, 6 you know, for both of them. 7 She needed to feel comfortable being 8 transparent, and I thought her transparency would 9 be reassuring to him. 10 Q And you understood that -- your belief was 11 that, at times, where she felt that if she told 12 him something, that could make Mr. Depp very 13 angry? 14 MR. PRESIADO: Objection, misstates 15 testimony, assumes facts not in evidence. 16 BY MR. NADELHAFT: 17 Q You can answer. 18 A Can you say that again. The question 19 again. 20 Q It was your impression, in working with 21 Amber, that she felt, at times, that if she told 22 Mr. Depp something that -- something -- if she was</p>	<p>319</p> <p>1 abuse, yeah. 2 Q What about if you don't see -- if you 3 don't actually see the abuse between two adults, 4 do you have a duty to report that? 5 MR. PRESIADO: Objection, calls for a 6 legal conclusion. 7 BY MR. NADELHAFT: 8 Q Based on your understanding as psychi- -- 9 as a clinical doctor? 10 MR. PRESIADO: Same objection. 11 A It's not my understanding that, if someone 12 makes that kind of claim and I don't see any 13 evidence of it, that I have a duty to report that. 14 It was certainly not something that Amber wanted 15 me to report. 16 Q Amber wanted -- in working with Amber, 17 until she got the divorce, wanted the relationship 18 with Mr. Depp to work, correct? 19 A She wanted the relationship to work, so 20 that she was -- she was upset by whatever that 21 altercation was, but, you know, she wanted to 22 sustain the relationship.</p>
<p>318</p> <p>1 transparent and told him something, that could 2 cause him anger, correct? 3 MR. PRESIADO: Objection, misstates the 4 testimony, assumes facts not in evidence. 5 A Well, it could. It was content specific. 6 You know, there were certain kinds of predictable 7 triggers that were related to work and related to 8 -- work and what kind of work and who she was 9 going to be working with. So that there were 10 those kinds of issues, so that if she brought 11 those up, that those could trigger discussions and 12 that could bring up conflict. 13 Q And, in working with Amber, were you ever 14 concerned for Mr. Depp's safety? 15 A No. 16 Q Okay. 17 MR. NADELHAFT: I'm just checking out my 18 notes here. 19 BY MR. NADELHAFT: 20 Q Oh, is there any duty to -- there's a duty 21 to report child abuse, correct? 22 A There's a duty to report child abuse/elder</p>	<p>320</p> <p>1 MR. NADELHAFT: Okay. All right. Thank 2 you. I don't ever any further questions at this 3 time. 4 MR. PRESIADO: I just have a couple 5 house-cleaning questions, and then we'll get you 6 out of here. 7 EXAMINATION 8 BY MR. LEO PRESIADO: 9 Q Now, Dr. Cowan, you produced documents in 10 connection with this case, right? 11 A Yes. 12 Q We received 80 documents, we independently 13 -- because they didn't have any Bates 14 identifications, we independently marked them as 15 Exhibits 1 through 80. We've submitted them for 16 this deposition as Exhibits 1 through 4. If they 17 haven't all been admitted to the record, I request 18 that that be the case. 19 I just wanted to confirm with you that you 20 produced documents that were kept by your office 21 in the normal course of business, correct? 22 A Yes.</p>

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321	<p>1 Q Okay. And that would include the</p> <p>2 documents you produced to us, and we Bates-stamped</p> <p>3 as Exhibits 1 through 80, correct?</p> <p>4 A Yes.</p> <p>5 Q Cowan 1 through 80. Okay.</p> <p>6 And just explain for me, briefly, what it</p> <p>7 means -- what you think I mean by the "normal</p> <p>8 course of business."</p> <p>9 How do you keep documents, what is your</p> <p>10 practice, physically?</p> <p>11 A Just, you know, make notes, session notes,</p> <p>12 that I keep in my file.</p> <p>13 Q Okay. Yeah, that was a poorly worded</p> <p>14 question. I'm just trying to understand your</p> <p>15 procedure for storing documents. Do you mark them</p> <p>16 for a particular patient and put them in a</p> <p>17 particular file cabinet?</p> <p>18 A Yes. A file cabinet, yeah, in my office.</p> <p>19 Q Okay. And that's been your practice</p> <p>20 throughout your practice?</p> <p>21 A Yes.</p> <p>22 Q And at least it's been your practice</p>	323	<p>1 THE WITNESS: Okay. Thank you.</p> <p>2 MR. PRESIADO: If you can mark what I sent</p> <p>3 you as Exhibits 1 through 4.</p> <p>4 (Whereupon, the above-referenced document</p> <p>5 was marked as Exhibit No. 41.)</p> <p>6 (Whereupon, the above-referenced document</p> <p>7 was marked as Exhibit No. 42.)</p> <p>8 MR. NADELHAFT: Actually, if we can get</p> <p>9 this expedited. I don't know what -- how quickly</p> <p>10 can you get it? I'm not asking for tomorrow</p> <p>11 morning.</p> <p>12 MR. PRESIADO: We have our order on file.</p> <p>13 MR. NADELHAFT: So we'll have a copy of</p> <p>14 the video, and Monday?</p> <p>15 THE COURT REPORTER: For sure Monday, but</p> <p>16 it was a question of Friday. Do you want Friday,</p> <p>17 if I can get it?</p> <p>18 MR. NADELHAFT: Yes, if you can get it.</p> <p>19 THE COURT REPORTER: All right. Thank</p> <p>20 you.</p> <p>21 (Concluded at 5:50 p.m. Pacific; 8:50 p.m. Eastern)</p> <p>22</p>
322	<p>1 during the time period you treated Ms. Heard,</p> <p>2 correct?</p> <p>3 A Yes.</p> <p>4 Q Okay. Let's see --</p> <p>5 MR. PRESIADO: Okay. That's all I have.</p> <p>6 MR. NADELHAFT: All right. Thank you.</p> <p>7 We're going to mark -- given the sensitive</p> <p>8 nature of this, we're going to mark the entire</p> <p>9 deposition confidential, pending review of the</p> <p>10 transcript.</p> <p>11 And, Dr. Curry, I know you are a signer</p> <p>12 onto the protective order, but for all of us, just</p> <p>13 to make sure no one says anything outside of this</p> <p>14 deposition, given the confidential designation</p> <p>15 currently for the deposition.</p> <p>16 MR. PRESIADO: Yeah, I don't think you</p> <p>17 need to personally instruct Dr. Curry, but your</p> <p>18 statement is on the record.</p> <p>19 MR. NADELHAFT: Correct.</p> <p>20 MR. PRESIADO: Are we fished?</p> <p>21 THE VIDEOGRAPHER: We are going off the</p> <p>22 record at 2045.</p>	324	<p>1 CERTIFICATE OF SHORTHAND REPORTER-NOTARY PUBLIC</p> <p>2</p> <p>3 I, Deborah Pearce, the officer before whom the</p> <p>4 foregoing deposition was taken, do hereby certify</p> <p>5 that the foregoing transcript is a true</p> <p>6 and correct record of the testimony given; that</p> <p>7 said testimony was taken by me stenographically</p> <p>8 and thereafter reduced to typewriting under my</p> <p>9 supervision; that reading and signing was not</p> <p>10 requested; and that I am neither counsel for,</p> <p>11 related to, nor employed by any of the parties to</p> <p>12 this case and have no interest, financial or</p> <p>13 otherwise, in its outcome.</p> <p>14 IN WITNESS WHEREOF, I have hereunto set my hand</p> <p>15 and affixed my notarial seal this 10th day of</p> <p>16 December, 2021.</p> <p>17 </p> <p>18</p> <p>19 DEBORAH J. PEARCE, Notary Public</p> <p>20 State of Maryland</p> <p>21 My commission expires 8-19-2023</p> <p>22 Commonwealth of Virginia</p> <p>My commission expires 8-31-2023</p>