1	SUPERIOR COURT OF THE STATE OF CALIFORNIA
	FOR THE COUNTY OF LOS ANGELES
2	JOHN C. DEPP, II, SCARAMANGA)
	BROS., INC., A CALIFORNIA)
3	CORPORATION; L.R.D.)
	PRODUCTIONS, INC., A CALIFORNIA)
4	CORPORATION, INFINITUM NIHIL, A)
	CALIFORNIA CORPORATION,)
5	PLAINTIFFS,)
	vs.) No. BC680066
6	BLOOM HERGOTT DIEMER ROSENTHAL)
	LAVIOLETTE FELDMAN SCHENKMAN &)
7	GOODMAN, LLP, JACOB A. BLOOM)
	AND DOES 1-30,
8	DEFENDANTS.)
)
9)
	BLOOM HERGOTT DIEMER ROSENTHAL)
10	LAVIOLETTE FELDMAN SCHENKMAN &)
11	GOODMAN, LLP,)
1-2	CROSS-COMPLAINANTS,)
13	vs.)
14	JOHN C. DEPP, II, SCARAMANGA)
15	BROS., INC., A CALIFORNIA)
16	CORPORATION; L.R.D.)
17	PRODUCTIONS, INC., A CALIFORNIA)
18	CORPORATION, INFINITUM NIHIL, A)
19	CALIFORNIA CORPORATION,)
20	CROSS-DEFENDANTS.
21	VIDEOTAPED DEPOSITION OF TRINITY CORRINE ESPARZA
22	FRIDAY, JANUARY 25, 2019
23	JOB NO. 3195110
24	REPORTED BY: D'ANNE MOUNGEY, CSR 7872
25	Pages 1- 113
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2 T. 3 SI 4 11 5 M 6 7 8 A 9 10 11 12 13 14 15 16 17 18 19 20 21	DIDEOTAPED DEPOSITION OF TRINITY CORRINE ESPARZA, ESQ. AKEN ON BEHALF OF PLAINTIFFS AT 1100 GLENDON AVENUE, UITE 1840, LOS ANGELES, CALIFORNIA, COMMENCING AT 1:26 A.M. ON FRIDAY, JANUARY 25, 2019, BEFORE D'ANNE IOUNGEY, CSR 7872. PPEARANCES OF COUNSEL: FOR THE PLAINTIFFS: BROWN RUDNICK BY: BENJAMIN G. CHEW, ESQ. 601 THIRTEENTH STREET NW SUITE 600 WASHINGTON, DC 20005 202.536.1763 BCHEW@@BROWNRUDNICK.COM (NOT PRESENT) -AND- BROWN RUDNICK BY: CAMILLE M. VASQUEZ, ESQ. 2211 MICHELSON DRIVE SEVENTH FLOOR IRVINE, CALIFORNIA 92612 949.752.7100 CVASQUEZ@BROWNRUDNICK.COM (NOT PRESENT) -AND- THE ENDEAVOR LAW FIRM, P.C.	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20	FOR THE DEFENDANTS FREEDMAN & TAITELMAN, LLP BY: BRYAN J. FREEDMAN, ESQ. 1901 AVENUE OF THE STARS SUITE 500 LOS ANGELES, CALIFORNIA 90067 310.201.0005
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1 A)	PPEARANCES (CONTINUED)	1	INDEX
2			INDEA
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•	STEIN MITCHELL BEATO & BISSNER BY: BRITTANY W. BILES, ESQ.		WITNESS EXAMINATION PAGE
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19		18	
			A1A1 ***
	-AND-		(NONE)
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20 21 22	-AND- REED SMITH BY: KURT C. PETERSON, ESQ. 1901 AVENUE OF THE STARS SUITE 700	19 20 21	
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I LOS ANGELES, CALIFORNIA	1 EXAMINATION
2 FRIDAY, JANUARY 25, 2019; 11:26 A.M.	2 BY MS. BILES:
3	3 Q Good morning, Ms. Esparza. My name is Brit
4	4 Biles. I will be asking you some questions today.
5 THE VIDEOGRAPHER: Good morning. We're on 11:26:00	5 As you can see, we have a court reporter 11:28:52
6 the record at 11:26 a.m. on January 25th, 2019.	6 here. She's taking down everything that we say, so
7 Please note that the microphones are sensitive and	7 it's important that we not talk over each other.
8 may pick up whispers, private conversations and	8 Sometimes when people get in conversations, they
9 cellular interference. And video recording will	9 anticipate what someone is going to say. But in
10 continue to take place unless all parties agree to 11:26:21	10 this situation, let me finish my question before you 11:29:06
11 go off the record.	11 give your answer, and I'll try to do the same and
12 This is media unit number 1 of the video	12 let you finish your answer before I ask my next
13 recorded deposition of Trinity Corrine Esparza taken	13 question.
14 by counsel for the plaintiffs and cross-defendants	14 For the same reason, nonverbal answers
15 in the matter of "John C. Depp, II, et al., versus 11:26:40	15 can't be recorded on the record, like nods or 11:29:19
16 Bloom Hergott Diemer Rosenthal Laviolette Feldman	16 "uh-huh's" or things of that nature, so it's very
17 Schenkman & Goodman, LLP, et al.," and related	17 important to respond with a verbal answer. I'll do
18 cross-action, filed in the Superior Court of the	18 my best to remind you if I see you lapsing into any
19 State of California for the County of Los Angeles.	19 uh-huh's or anything. Just try your best just to
20 Case number BC 680066. 11:27:09	20 answer verbally. 11:29:35
21 This deposition is being held at the	21 If you answer a question, I'm going to
22 Stalwart Law Group, located at 1100 Glendon Avenue,	22 assume that you understood my question. So if you
23 Los Angeles, California, 90024. My name is Steven	23 don't understand a question, just go ahead and let
24 Togami from the firm Veritext Legal Solutions, and I	24 me know and I'm happy to rephrase it in a way that
25 am the videographer. The court reporter is D'Anne 11:27:35 Page	25 is understandable. Sometimes my questions aren't as 11:29:48 Page 8
1 Moungey from the firm Veritext Legal Solutions. I	1 good as I think they are. Just bear with me and
2 am not related to any party in this action, nor am I	2 I'll try to get to a good question.
3 financially interested in the outcome.	3 If you need to take a break at any point,
4 If there are any objections to proceeding,	4 let me know and we can go off the record for you to
5 please state them at the time of your appearance. 11:27:55	5 take a break. This isn't a marathon or some sort of 11:30:01
6 At this time, will counsel and all present	6 an endurance test, Just let me know. I just ask if
7 please state their appearances and affiliations for	7 there is a question pending, that you answer the
8 the record.	8 question before we go off the record and take the
9 MS. BILES: Brit Biles, Stein Mitchell	9 break.
10 Betao & Missner for Mr. Depp and his companies. 11:28:0	8 10 Does all of that sound fair? 11:30:12
11 MR. WALDMAN: Adam Waldman, Endcavor Law	11 A Yes.
12 Firm for Mr. Depp and his companies.	12 Q What do you do for a living, Ms. Esparza?
13 MR. WRENSHALL: Mathew Wrenshall with Reed	13 A I own the concierge and security company
14 Smith for Bloom Hergott and Jacob Bloom.	14 that runs the Eastern Columbia building.
15 THE VIDEOGRAPHER: Thank you. 11:28:22	
16 Can we please have the oath.	16 A I provide the front desk staffing.
17 THE WITNESS: Trinity Esparza on behalf of	17 Q What does that mean?
18 Mr. Depp.	18 A We monitor the cameras and make sure that
19	19 no one can come in and out of the building without
20 TRINITY CORRINE ESPARZA,	20 consent and authorized access. We sorry. I'm a 11:30:46
21 having been first duly sworn by the reporter, was	21 little nervous.
22 examined and testified as follows:	22 We provide our residents with, like,
23 ///	23 packages and dry cleaning.
24 ///	24 Q When you say you monitor the cameras, do
25 ///	25 you mean security cameras? 11:31:03
Page	Page 9

1 A Correct.	l I'd say like seven feet of hallway distance from the
2 Q What is involved in monitoring the cameras?	2 wall. It's in like a secure place. So we sit right
3 A Well, we want to obviously protect the	3 behind the front desk and when residents come up to
4 residents' safety, so we're just making sure that no	4 us, we stand and we greet them.
5 one is coming in and out of the building that aren't 11:31:1	9 5 Q. At the front desk, are there monitors where 11:33:54
6 supposed to and we just make sure that things are	6 you view the security cameras?
7 running smoothly.	7 A Correct.
8 Q Let's back up.	8 Q So if you're sitting at the front desk, you
9 Where is the Eastern Columbia building	9 have monitors displayed in front of you?
10 located? 11:31:38	10 A Yes. Well, to the side. Like this 11:34:06
11 A 849 South Broadway.	11 (indicating). They were like this at the time
12 Q And what is the Eastern Columbia building?	12 (indicating).
13 A Condominium complex.	13 Q And do you watch the security camera
14 Q How many units are in it?	14 footage as it's happening or can you go back later
15 A 147. 11:31:46	15 and look at something that happened at a prior time? 11:34:19
16 Q How many security cameras are in the	16 A At that time you could go look at it for up
17 building?	17 to 26 days.
18 A We just added more. So we have about 40.	18 Q Then what happened on day 27?
19 Q In the 2016 timeframe, approximately how	19 A Then it starts over. So if you didn't save
20 many cameras were in the East Columbia building? 11:3	32:02 20 the file, then it would be removed from the system. 11:34:33
21 A Around 20.	21 Q As the concierge at the Eastern Columbia
22 Q Where are the cameras directed?	22 building sitting at the front desk, do you have an
23 Are they directed to common areas or to	23 opportunity to interact with residents of the
24 individual units, or how is it set up?	24 building?
25 A Common areas, there's three that are 11:32:15	25 A Yes. Always. 11:34:47
Pag	Page 1
1 located in the elevators, there's one facing the	1 Q In what situations do you interact with
2 front desk, the entrances, dog run, mezzanine level,	2 residents typically?
3 by the mailroom, exiting and entering the parking	3 A If they need something, if they're going to
4 garage. They're in the lobby by the front door.	4 let us know about like a housekeeper or if they need
5 Do you want to know I think I covered 11:32:54	
6 all of it.	6 personal items. If they want to leave something for
7 Q Okay. If you think of any more, just let	7 us for someone else to pick up. If they need us to
8 me know.	8 print something. If they're passing by, if
9 You've talked about monitoring the cameras.	9 they're exiting the building, we always see them and
10 Do you physically work in the Eastern 11:33:05	10 we greet them whether they're coming in or coming 11:35:1
11 Columbia building?	11 out.
12 A I do, yes.	12 Q During your work at the East Columbia
13 Q When do you work there?	13 building, did you become aware that Johnny Depp and
14 A Monday through Friday.	14 Amber Heard were residents of the building?
15 Q What are your hours? 11:33:12	15 A Yes. 11:35:28
16 A At that time it was 8:00 to 4:00.	16 Q Do you know what unit they lived?
17 Q When you say "at that time," you mean in	17 A Penthouse 3.
18 2016?	18 Q During what period of time did you
19 A Correct. 8:00 a.m. to 4:00 p.m.	19 understand that they were residents of the building?
20 Q Where do you physically sit in the Eastern 11:33:22	
21 Columbia building when you're working?	
22 A At the front desk.	21 2015.
23 Q Can you describe the layout of the front	, 22 Q And at what point did they cease to be
24 desk to us?	23 residents in the building?
	24 A Well, Amber would come down. He never
25 A Sure. The front desk is there's about 11:33:30 Page	25 really did. She would come down and walk by us and 11:35: Page 13
	rage I.

1 talk to us, and so it was obvious that they were	1 the incident occurred or the alleged incident
2 living there. And her friends were living there as	2 occurred,
3 well.	3 Q When you say "the alleged incident," what
4 Q "Her friends" being who?	4 are you talking about?
5 A Raquel Pennington and Josh. 11:36:05	5 A The fight that was reported to occur. 11:38:12
6 Q I think you anticipated one of my next	6 Q Okay. Let's unpack that a little bit.
7 questions. You said that Ms. Heard would come down	7 A Okay.
8 and interact with you.	8 Q First of all, when are we talking about?
9 How many times would you say that you	9 What year is this you're talking about?
10 interacted with Ms. Heard in person when she was a 11:36:18	_
11 resident?	11 Q What month?
12 A Oh, a lot.	12 A May.
13 Q When you say "a lot," was it more than ten	13 Q Do you know a specific date in May?
14 times?	14 A The 21st.
15 A Yes. 11:36:36	15 Q So what did you learn supposedly happened 11:38:34
16 Q More than 20 times?	16 on May 21st, 2016?
17 A Yes.	17 A I just know the police were called. My
18 Q More than 50 times?	18 employee called me and said the police were called
19 A Yes.	19 to Penthouse 3.
20 Q More than 100 times? 11:36:40	20 Q Who is your employee that called you? 11:38:52
21 A I wouldn't I'm not going to say that.	21 A Gaylynn Sumerland.
22 Q Somewhere between 50 and 100 times you	22 Q Is she still your employee?
23 interacted with Ms. Heard in person?	23 A Yes.
24 A Correct.	24 Q How did she become aware that the police
25 Q Other than interacting with Ms. Heard in 11:36:51	25 had been called? 11:39:01
Page 14	Page 16
1 person, did you also observe her on security	1 A The police came to the front desk and said
2 cameras?	2 that they needed to get they needed access to the
3 A Yes.	3 penthouse level.
4 Q How many times would you say you observed	4 Q And your employee Gaylynn gave them access?
5 Ms. Heard on security cameras? 11:36:59	5 A Correct. 11:39:12
6 A Too many to count, really.	6 Q This was on May 21st, 2016?
7 Q You had mentioned that Mr. Depp didn't come	7 A Correct.
8 down as much as she did.	8 Q After May 21st, 2016, did you have any
9 Did you ever interact with Mr. Depp during	9 interactions with Ms. Heard or Mr. Depp?
10 your employment at the Eastern Columbia building? 11:37:13	10 A Yes. 11:39:23
11 A I saw him one time in person.	11 Q Can you tell me about those interactions?
12 Q Was that in the lobby area?	12 A I saw Ms. Heard on Monday, Tuesday,
13 A I was in the package room and he was going	13 Wednesday and Friday that week.
14 up he had just escorted her out and then I was	14 Q Did you have any conversations with her
15 getting a phone call, so I exited the package room 11:37:35	15 about the police coming to the penthouse? 11:39:34
16 and he was standing there and then I went to go get	16 A Not about the police.
17 the phone call.	17 Q What conversations did you have with her?
18 Q At some point in time did you become aware	18 A On Monday she came down to discuss
19 that Ms. Heard and Mr. Depp were going through a	19 something with me and then on Tuesday something as
20 divorce? 11:37:48	20 well. Just minor. On Wednesday she needed me to 11:40:01
21 A Yes.	21 give her keys to a housekeeper.
22 Q When did you become aware of that?	22 Q Okay. And after Wednesday when you say
23 A Amber told me.	23 "Wednesday," are we talking about May 25th, 2016?
24 Q When was that?	24 A That is correct.
25 A I believe Friday, it was Friday after 11:37:55	25 Q So after Wednesday, did you have any 11:40:23
Page 15	Page 17

1 additional interactions with Ms. Heard?	1 sort of allegations about what caused those marks?
2 A I did. I saw her on Friday.	2 A Yes. Later.
3 Q Backing up.	3 Q What did you hear later?
4 When you saw Ms. Heard on the Monday, which	4 A Well, she was going to go file a domestic
5 was May 23rd 11:40:35	5 violence restraining order. 11:42:05
6 A Uh-huh.	6 Q How did you learn that she was going to go
7 Q did she have any visible injuries to her	7 file a domestic violence
8 body?	8 A Online.
9 A No.	9 O Online.
10 Q Did she have any bruises on her face? 11:40:41	10 You heard in the media that Ms. Heard was 11:42:12
11 A No.	11 filling a restraining order?
12 Q Any cuts on her face?	12 A Correct. And she told me on Friday that
13 A No.	13 she was getting a divorce.
14 Q Any signs of having been hit or struck in	14 Q So you saw her for several days in a row
15 any way? 11:40:49	
16 A No.	15 without any visible injuries; correct? 11:42:25 16 A Correct.
17 Q What about when you saw Ms. Heard on	
,	17 Q Then on Friday, May 27th, she suddenly has
18 Tuesday, did she have any visible injuries on her	18 injuries to her face; is that right?
19 body? 20 A No. 11:40:55	19 A Correct.
***************************************	20 Q Did that strike you as odd? 11:42:34
21 Q Any signs of being hit or struck?	21 A I did I asked her if she was okay.
22 A No.	22 Q Did you have any conversations with anyone
23 Q Any bruises?	23 in the building about what may have been going on at
24 A No.	24 that time?
Q What about when you saw Ms. Heard on 11:41:00Page 18	25 A Yes. 11:42:47
	Page 20
1 Wednesday, May 25th, 2016, did she have any injuries	1 Q Can you describe those conversations.
2 on her body?	2 A I asked other associates if they had seen
3 A No.	3 anything on her face when they interacted with her.
4 Q Did she have any signs of bruises?	4 Q And what did they say?
5 .A No. 11:41:09	5 A No. 11:43:04
6 Q Or having been hit or struck?	6 Q Who were those other associates that you
7 A No.	7 asked?
8 Q What about when you saw her on Thursday,	8 A Alex, Cornelius.
9 May 26th?	9 Q What is Alex's full name?
10 A I didn't see her on Thursday. 11:41:16	10 A Alex Romero. 11:43:15
11 Q Okay. Fair enough. Thanks for clarifying	11 Q And what about Cornelius?
12 that.	12 A Cornelius Harrell.
13 Did you see her again on Friday, May 27th?	13 Q Had they interacted with Ms. Heard in the
14 A Yes.	14 week between May 21st and May 27th as well?
15 Q At that point in time, did she have any 11:41:24	15 A Yes. 11:43:26
16 injuries to her body?	16 Q Can you describe your conversations in a
17 A Yes.	17 little bit more detail with them?
18 Q Can you describe what those injuries looked	18 A Cornelius text me on Sunday because he was
19 like?	19 really excited that he had met her and he said, oh,
20 A Yes. She had a red cut underneath her 11:41:30	20 my God, I just met Amber Heard. 11:43:40
21 right eye and red marks by her eye.	2I Q Uh-huh.
22 Q Did you ever ask her what caused those	22 What else did he say?
23 marks?	23 A I said, isn't she lovely?
24 A No.	24 And he said, yes.
25 Q At some point in time did you hear some 11:41:47	25 Q Did you later have a separate conversation 11:43:56
Page 19	Page 21

1 mid M. Vamellakanambata a N. V. III	
1 with Mr. Harrell about whether or not Ms. Heard had	1 A I believe it was Wednesday.
2 marks on her face when he interacted with her?	2 Q Wednesday, May 25th?
3 A Yes.	3 A It was either I believe it was
4 Q When was that conversation?	4 Wednesday, yes.
5 A I think the following week that he worked. 11:44:08	5 Q Did he indicate to you that when he talked 11:46:21
6 Q Do you recall when that was?	6 with and interacted with Ms. Heard on May 25th, that
7 A The Sunday after the previous Sunday.	7 she had any marks or cuts or bruises on her face?
8 Q So around the 29th of May?	8 A No. He said he didn't see anything.
9 A Correct.	9 Q You mentioned you also talked with Gaylynn.
10 Q And can you walk us through that 11:44:23	10 Can you describe that conversation? 11:46:38
11 conversation, what you said to Mr. Harrell, what	11 A I asked Gaylynn if she had seen what had
12 Mr. Harrell said to you.	12 happened, if she had seen them after the police
13 A I asked him if on Sunday if he saw a mark	13 came, and she said no.
14 on her face, and he said no.	14 Q But I just want to tie all this up and make
15 Q And that was the Sunday, the day after the 11:44:37	15 sure I'm following what you're saying. 11:46:55
16 police came; is that right?	16 You had interacted with Ms. Heard for
17 A Correct.	17 several times between May 23rd and May 27th?
18 Q Who else did you talk to other than	18 A Correct.
19 Mr. Harrell?	19 Q Alex had interacted with Ms. Heard some
20 A The general manager and Alex and Gaylynn, 11:44:4	
21 Q Let's take those one by one. Let's start	21 A Yes.
22 with Alex.	22 Q And Cornelius Harrell had interacted with
When did you talk to Alex?	23 Ms. Heard on May 22nd, the day after the police
24 A I talked to Alex when it was surfacing	24 came; correct?
25 that when the picture had surfaced online that 11:45:07 Page 2	25 A Yes. 11:47:17 Page 24
I she had a mark on her face.	1 Q So through all of those interactions when
2 Q When you say "the picture," can you be a	2 the three of you talked, what conclusion did you
3 little bit more specific?	3 come to?
4 A The picture that was posted of the alleged	4 That was a bad question. Let me withdraw
5 incident of 11:45:19	5 it. 11:47:34
6 Q Okay. So are we talking around Friday, the	6 So the three of you all had interactions
7 27th of May at this point?	7 with Ms. Heard in that week and what was your
8 Is that when the picture was posted, or was	8 what did you all observe about her face in those
9 it later?	9 interactions with her?
10 A Oh, maybe it was I'm not sure when the 11:45:32	10 A That it did not occur on Saturday. 11:47:47
11 picture was posted.	11 Q What did not occur on Saturday?
12 Q But something became public that caused you	12 A Whatever happened to her face did not
13 to inquire of Alex about whether he had seen similar	13 happen on Saturday.
14 marks on her face; is that right?	14 Q And for the course of let me back up.
15 A I asked if he had encountered with her, 11:45:45	During that same time period, that May 21st 11:48:12
16 yes.	16 through the 27th time period, in addition to
17 Q Did he have encounters with her that week?	17 interacting with Ms. Heard in person, did you also
18 A Yes.	18 observe Ms. Heard on the security tapes?
19 Q Can you describe what he told you about	19 A Yes.
20 those encounters? 11:45:54	20 Q How did she appear on the security tapes? 11:48:26
21 A He told me that her and Raquel asked him to	21 A Fine.
22 come upstairs to their loft and look to see if	22 Q "Fine" meaning what?
23 anyone was inside because they were nervous or	23 A She was happy and normal.
- · · · · · · · · · · · · · · · · · · ·	24 Q Did she have any visible injuries to her
24 scared.	21 Q Dia bile hare any ristole injuries to her
24 scared.25 Q Did he indicate what day that was? 11:46:10	25 face? 11:48:40

1 A No.	I Q Why did you think those would be helpful
2 Q At some point in time I want to skip a	2 times?
3 little bit ahead now were you involved with	3 If you don't recall the times, we can talk
4 taking footage from the security cameras and	4 more about the content.
5 providing it to Mr. Depp's divorce lawyers? 11:48:55	5 A There was a lot to look at, so and this 11:51:35
6 A Yes.	6 was before my general manager told me that I
7 Q When was that?	7 couldn't say anything about the footage, so I was
8 A They had asked for, I believe, 72 hours of	8 just kind of I thought I was being helpful, but I
9 the footage. And so the general manager asked me to	9 didn't know I wasn't supposed to be helpful.
10 start downloading it, but later took over the 11:49:12	10 Q Okay. I'm not sure I'm following you. 11:51:52
11 process.	11 A Because we hadn't talked to our attorneys
12 Q Do you recall who you interacted with on	12 yet.
13 behalf of Mr. Depp at that time?	13 Q Okay. I see.
14 A Pardon me?	14 But you were trying to be helpful. What
15 Q Do you recall which lawyers or people 11:49:23	15 information did you give to the attorneys who were 11:52:03
16 working for the lawyers you interacted with?	16 there on behalf of Mr. Depp?
17 A Yes. His attorneys came in after, I	17 A There was some footage of Amber and her
18 believe, we were subpoenaed I don't remember all	18 sister and Raquel coming back from dinner.
19 that "indepthly."	19 Q Can you describe what you remember about
20 Q Do you recall any of the names of the 11:49:50	20 that footage? 11:52:22
21 lawyers you worked with?	21 A Her sister pretended to punch her in the
22 A Yes. Can you just ask me a couple of the	22 face.
23 names?	
24 Q Sure.	,
	24 was?
Do you recall anyone from the Bloom Hergott 11:50:07 Page 26	25 A Tuesday. 11:52:30 Page 23
1 law firm?	1 Q Tuesday, May 24th, 2016?
2 A Well, his attorney and his attorney's	2 A Correct.
3 assistant came in to look at the footage at one	3 Q Was that let me back up a second.
4 point.	4 So when the lawyers came in and looked at
5 Q Do you recall which law firm they were 11:50:23	5 the footage, did they copy a particular footage? 11:52:43
6 from?	6 How did they go about identifying what they
7 Was it Laura Wasser? Patty Glaser? Blair	7 wanted to take?
8 Burke?	8 A They had someone else come and go look
9 A Yes, Laura Wasser and Blair Burke.	9 through all the footage on their behalf afterwards,
10 Q Were the lawyers you dealt with? 11:50:38	
11 A Yes.	· · · · · · · · · · · · · · · · · · ·
	11 and I think our our camera systems were like
~	12 pretty slow, so it's really time consuming, so they
13 A One of them came. I don't know if they	13 hired someone to come in and find the footage that
14 were both together. I just don't recall. I know	14 they needed, from my understanding.
LO DUE OF INEM CAME to the hilliding maybe both of them I 1-50-79	16 0 00 1.1
15 one of them came to the building, maybe both of them 11:50:48	
16 came to the building the first day and then only one	16 that they needed, what happened?
16 came to the building the first day and then only one 17 of them came back.	16 that they needed, what happened?17 Was that copied?
 16 came to the building the first day and then only one 17 of them came back. 18 Q Do you recall if you pointed them to 	 16 that they needed, what happened? 17 Was that copied? 18 How did it work?
 16 came to the building the first day and then only one 17 of them came back. 18 Q Do you recall if you pointed them to 19 specific footage that you thought would be helpful? 	 16 that they needed, what happened? 17 Was that copied? 18 How did it work? 19 A I think that they were looking for footage
 16 came to the building the first day and then only one 17 of them came back. 18 Q Do you recall if you pointed them to 19 specific footage that you thought would be helpful? 20 A Yes. 11:51:02 	 16 that they needed, what happened? 17 Was that copied? 18 How did it work? 19 A I think that they were looking for footage 20 for any time that like they saw Amber or whatnot. 11:53:27
16 came to the building the first day and then only one 17 of them came back. 18 Q Do you recall if you pointed them to 19 specific footage that you thought would be helpful? 20 A Yes. 11:51:02 21 Q Tell me about that.	 16 that they needed, what happened? 17 Was that copied? 18 How did it work? 19 A I think that they were looking for footage 20 for any time that like they saw Amber or whatnot. 21 And then yeah, it was copied. Yes, it was copied
16 came to the building the first day and then only one 17 of them came back. 18 Q Do you recall if you pointed them to 19 specific footage that you thought would be helpful? 20 A Yes. 11:51:02 21 Q Tell me about that. 22 A I just briefly mentioned a couple times	16 that they needed, what happened? 17 Was that copied? 18 How did it work? 19 A I think that they were looking for footage 20 for any time that like they saw Amber or whatnot. 21 And then yeah, it was copied. Yes, it was copied 22 and given to them.
16 came to the building the first day and then only one 17 of them came back. 18 Q Do you recall if you pointed them to 19 specific footage that you thought would be helpful? 20 A Yes. 11:51:02 21 Q Tell me about that. 22 A I just briefly mentioned a couple times 23 that they should check.	16 that they needed, what happened? 17 Was that copied? 18 How did it work? 19 A I think that they were looking for footage 20 for any time that like they saw Amber or whatnot. 21 And then yeah, it was copied. Yes, it was copied 22 and given to them. 23 Q Do you know if they took
16 came to the building the first day and then only one 17 of them came back. 18 Q Do you recall if you pointed them to 19 specific footage that you thought would be helpful? 20 A Yes. 11:51:02 21 Q Tell me about that. 22 A I just briefly mentioned a couple times	16 that they needed, what happened? 17 Was that copied? 18 How did it work? 19 A I think that they were looking for footage 20 for any time that like they saw Amber or whatnot. 21 And then yeah, it was copied. Yes, it was copied 22 and given to them.
16 came to the building the first day and then only one 17 of them came back. 18 Q Do you recall if you pointed them to 19 specific footage that you thought would be helpful? 20 A Yes. 11:51:02 21 Q Tell me about that. 22 A I just briefly mentioned a couple times 23 that they should check.	16 that they needed, what happened? 17 Was that copied? 18 How did it work? 19 A I think that they were looking for footage 20 for any time that like they saw Amber or whatnot. 21 And then yeah, it was copied. Yes, it was copied 22 and given to them. 23 Q Do you know if they took

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1 when I had mentioned, oh, I saw her here and I saw	1 Q Is this the front desk that you described
2 her here.	2 in your prior testimony?
3 Q So you don't believe that was among the	3 A Yes.
4 footage that they collected?	4 Q Can you tell by looking at this video clip
5 A I don't think they it was so quick, that 11:53:52	5 when this surveillance footage was shot? 12:01:31
6 I had said, oh it was so quick, that I had told	6 A Yes.
7 them I don't think they knew what they were looking	7 Q When was it?
8 for.	8 A May 25th at approximately 1:42 p.m.
9 Q And for the footage that wasn't collected,	9 Q This was during your normal workday?
10 what happened to that footage? 11:54:10	10 A Yes. 12:01:47
11 A It all gets crased after 26 days.	11 Q And you appear to be sitting at the desk
12 Q So – go ahead.	12 during work of some sort.
13 I didn't mean to interrupt you.	13 When you describe the work that you've
14 A It's fine.	14 done that you do at the Eastern Columbia
15 Q So we actually have some of the footage 11:54:30	15 building, is this what you do, you sit at this front 12:01:58
16 that was collected and we can go through that, but I	16 desk and manage whatever is going on in the building
17 want to take a quick break and get that set up	17 for the residents?
18 before we start looking at specific clips and we can	18 A Yes.
19 talk about those and the context of your	19 Q I'm going to attempt to fast forward a bit,
20 interactions with Ms. Heard. 11:54:43	20 but before I do that, I believe you testified 12:02:11
21 A Great,	21 earlier about an interaction that you had with
22 MS. BILES: Go off the record briefly.	22 Ms. Heard involving a key for a housekeeper.
THE VIDEOGRAPHER: Going off the record at	23 A Correct.
24 11:54 a.m.	24 Q Can you tell us more about that
25 ///	25 interaction? 12:02:23
Page 30	Page 32
1 (Whereupon, a recess was held	1 A Yes. She came down to ask me to give her
2 from 11:54 a.m. to 12:00 p.m.)	2 housekeepers her key to her unit.
THE VIDEOGRAPHER: Going back on the record	3 Q And that was on Wednesday, May 25th?
4 at 12:00 p.m.	4 A Yes.
5 BY MS. BILES: 12:00:12	5 Q I'm going to fast forward, if I can. I 12:02:38
6 Q Ms. Esparza, so we have 87 video clips that	6 believe that interaction you've described is
7 we subpoenaed that were the video clips that were	7 actually depicted on this video, so let me see if I
8 collected by the divorce lawyers in the divorce	8 can get to it.
9 case. I have some of those here today.	9 I want you to take a look at the video and
10 I would like to show them to you so you can 12:00:28	10 let me know what you see as it continues to play. 12:03:02
11 explain them to us and let us know what it is you	11 A Fed Ex guy dropping off a package. He
12 saw in the videos and how they match up with your	wa wa gay anopping ou a package. He
· · · · · · · · · · · · · · · · · ·	
13 own interactions.	12 hands me the device to sign for the package.
13 own interactions. 14 MS BILES: So the first one we're going to	12 hands me the device to sign for the package.13 Q Are you on the phone?
MS. BILES: So the first one we're going to	 12 hands me the device to sign for the package. 13 Q Are you on the phone? 14 Is that a cell phone that you're holding?
MS. BILES: So the first one we're going to mark this as Exhibit 204 A. 12:00:42	 12 hands me the device to sign for the package. 13 Q Are you on the phone? 14 Is that a cell phone that you're holding? 15 A No. I'm on the work phone. 12:03:26
MS. BILES: So the first one we're going to 15 mark this as Exhibit 204 A. 12:00:42 16 (Whereupon, Plaintiffs' Exhibit 204 was	 12 hands me the device to sign for the package. 13 Q Are you on the phone? 14 Is that a cell phone that you're holding? 15 A No. I'm on the work phone. 12:03:26 16 Q So there's a landline phone there?
MS. BILES: So the first one we're going to mark this as Exhibit 204 A. 12:00:42 (Whereupon, Plaintiffs' Exhibit 204 was marked for identification by the	12 hands me the device to sign for the package. 13 Q Are you on the phone? 14 Is that a cell phone that you're holding? 15 A No. I'm on the work phone. 12:03:26 16 Q So there's a landline phone there? 17 A Yes. Two lines.
MS. BILES: So the first one we're going to mark this as Exhibit 204 A. 12:00:42 (Whereupon, Plaintiffs' Exhibit 204 was marked for identification by the Court Reporter.)	12 hands me the device to sign for the package. 13 Q Are you on the phone? 14 Is that a cell phone that you're holding? 15 A No. I'm on the work phone. 12:03:26 16 Q So there's a landline phone there? 17 A Yes. Two lines. 18 Q Do you recognize that person?
MS. BILES: So the first one we're going to mark this as Exhibit 204 A. 12:00:42 (Whereupon, Plaintiffs' Exhibit 204 was marked for identification by the Court Reporter.) BY MS. BILES:	12 hands me the device to sign for the package. 13 Q Are you on the phone? 14 Is that a cell phone that you're holding? 15 A No. I'm on the work phone. 12:03:26 16 Q So there's a landline phone there? 17 A Yes. Two lines. 18 Q Do you recognize that person? 19 A Yes.
MS. BILES: So the first one we're going to mark this as Exhibit 204 A. 12:00:42 (Whereupon, Plaintiffs' Exhibit 204 was marked for identification by the Court Reporter.) BY MS. BILES: Q Can you describe what you're seeing here on 12:00:53	12 hands me the device to sign for the package. 13 Q Are you on the phone? 14 Is that a cell phone that you're holding? 15 A No. I'm on the work phone. 12:03:26 16 Q So there's a landline phone there? 17 A Yes. Two lines. 18 Q Do you recognize that person? 19 A Yes. 20 Q Who is that? 12:03:44
MS. BILES: So the first one we're going to mark this as Exhibit 204 A. 12:00:42 (Whereupon, Plaintiffs' Exhibit 204 was marked for identification by the Court Reporter.) BY MS. BILES: Q Can you describe what you're seeing here on 12:00:53 this video clip?	12 hands me the device to sign for the package. 13 Q Are you on the phone? 14 Is that a cell phone that you're holding? 15 A No. I'm on the work phone. 12:03:26 16 Q So there's a landline phone there? 17 A Yes. Two lines. , 18 Q Do you recognize that person? 19 A Yes. 20 Q Who is that? 12:03:44 21 A That's Amber Heard.
MS. BILES: So the first one we're going to 15 mark this as Exhibit 204 A. 12:00:42 16 (Whereupon, Plaintiffs' Exhibit 204 was 17 marked for identification by the 18 Court Reporter.) 19 BY MS. BILES: 20 Q Can you describe what you're seeing here on 12:00:53 21 this video clip? 22 A That is me behind the desk. There's a	12 hands me the device to sign for the package. 13 Q Are you on the phone? 14 Is that a cell phone that you're holding? 15 A No. I'm on the work phone. 12:03:26 16 Q So there's a landline phone there? 17 A Yes. Two lines. , 18 Q Do you recognize that person? 19 A Yes. 20 Q Who is that? 12:03:44 21 A That's Amber Heard. 22 Q Is this the interaction that you described
MS. BILES: So the first one we're going to mark this as Exhibit 204 A. 12:00:42 (Whereupon, Plaintiffs' Exhibit 204 was marked for identification by the Court Reporter.) BY MS. BILES: Q Can you describe what you're seeing here on 12:00:53 this video clip? A That is mc behind the desk. There's a package on a cart. There's our middle elevator and	12 hands me the device to sign for the package. 13 Q Are you on the phone? 14 Is that a cell phone that you're holding? 15 A No. I'm on the work phone. 12:03:26 16 Q So there's a landline phone there? 17 A Yes. Two lines. 18 Q Do you recognize that person? 19 A Yes. 20 Q Who is that? 12:03:44 21 A That's Amber Heard. 22 Q Is this the interaction that you described 23 about the key for the housekeeper?
MS. BILES: So the first one we're going to 15 mark this as Exhibit 204 A. 12:00:42 16 (Whereupon, Plaintiffs' Exhibit 204 was 17 marked for identification by the 18 Court Reporter.) 19 BY MS. BILES: 20 Q Can you describe what you're seeing here on 12:00:53 21 this video clip? 22 A That is me behind the desk. There's a	12 hands me the device to sign for the package. 13 Q Are you on the phone? 14 Is that a cell phone that you're holding? 15 A No. I'm on the work phone. 12:03:26 16 Q So there's a landline phone there? 17 A Yes. Two lines. , 18 Q Do you recognize that person? 19 A Yes. 20 Q Who is that? 12:03:44 21 A That's Amber Heard. 22 Q Is this the interaction that you described

1 A. She is handing me the key. 2 Q. At this point in time, to your knowledge, 3 was Ms. Heard warning makeup? 4 A. No. 5 Q. In your interactions with her, how often 6 did she appear to wear makeup? 7 A. Never. 8 Q. On this Wednesday, May 25th, did she have 9 any visible marks on her face? 10 A. No. 11 Q. Approximately how far from her in this 12 video were you when she was handing you the key? 13 A. We were very close. Arm's length. 14 Q. Other than this interaction that you had 15 with Ms. Heard, I think you described other 15 with Ms. Heard, I think you described other 16 interactions with her and seeing her other times on 17 the security footage; is that right? 18 A. Yes. 19 Q. So let's see if we can locate some of those 20 other videos. 12 20-454 21 I think you testified, and correct me if 22 I'm wrong, that there are security cameras in the 23 elevators in the Eastern Columbia building; is that 24 right? 25 A. Yes. 12 05-09 Page 34 1 Q. Is that all of the elevators? 2 A. Yes. 12 05-23 5 Q. So the clevator going to the penthouse 4 where Mr. Depp and Ms. Heard lived had a security 5 camera in it? 12 02-34 1 Q. Does this appear to be that clevator? 3 A. Yes. 12 05-34 1 A. We were very close. 3 A Correct. 7 Q. Does this appear to be that clevator? 8 A. Yes. 12 05-34 1 Q. Is that all of the elevators? 1 In this video. 2 Is that consistent with how she looked when 3 she came up to the desk to give you the key? 4 A. Yes. 5 Q. In this video, are there any marks on 12 07-58 13 A. Yes. 14 Mys. Heard's face 15 of the perthouse 15 where Mr. Depp and Ms. Heard lived had a security 16 camera in it? 19 Q. Does this appear to be that clevator? 19 Q. Does this appear to be that clevator? 20 A. Yes. 21 I in this video. 22 Is that consistent with how she looked when 3 she came up to the desk to give you the key? 4 A. Yes. 5 Q. In this video. 2 Is that consistent with how she looked when 3 she came up to the desk to give you the key? 4 A. Yes. 5 Q. In this video. 12 I was assuming this is right before she comes 13 to give i
3 Q Looks like the elevator is going up. 4 A No. 5 Q In your interactions with her, how often 12:04:13 6 did she appear to wear makeup? 7 A Never. 8 Q On this Wednesday, May 25th, did she have 9 any visible marks on her face? 10 A No. 12:04:23 11 Q Approximately how far from her in this 12:04:73 11 Q Approximately how far from her in this 12 video were you when she was handing you the key? 12 video were you when she was handing you the key? 13 A We were very close. Am's length. 14 Q Other than this interaction that you had 15 with Ms. Heard, I think you described other 12:04:41 16 interactions with her and seeing her other times on 17 the security footage; is that right? 16 A Yes. 19 Q So let's see if we can locate some of those 20 other videos. 12:04:54 21 I think you testified, and correct me if 22 I think you testified, and correct me if 22 I think you testified, and correct me if 23 elevators in the Eastern Columbia building; is that 24 right? 25 A Yes. 12:05:09 Page 34 1 Q Is that all of the elevators? 2 A Yes. Except for the parking. 3 Q So the elevator ging to the penthouse 4 where Mr. Depp and Ms. Heard lived had a security 5 camera in it? 12:05:23 6 A Correct. 7 Q Does this appear to be that elevator? 8 A Yes. 9 Q So I'm going to and what date was this 10 footage taken? 12:05:34 11 A May 25th, 2016, at 1:46 p.m. 12 Q Is this approximately the same time that 12 you interacted with Ms. Heard about the housekeeper 14 key? 15 A Yes. 12:05:74 12:05:74 11 A May 25th, 2016, at 1:46 p.m. 14 key? 15 A Yes. 12:05:74 12:05:74 11 A May 25th, 2016, at 1:46 p.m. 15 A Yes. 12:05:74 12:05:74 11 A May 25th, 2016, at 1:46 p.m. 16 In this video. 2 I shit a approximately the same time that 12:05:47 11 A May 25th, 2016, at 1:46 p.m. 17 A Yes. 12:05:69 11 Q Is this approximately the same time that 12:05:47 11 Q Is those the exercise she comes 13 to give it to you. 18 A Yes. 12:05:69 11 Q Is this approximately the same time that 12:05:69 11 Q Is this approximately the same time that 12:05:69 11 Q Is this approximately th
4 A No. 5 Q In your interactions with her, how often 6 did she appear to wear makeup? 7 A Never. 8 Q On this Wednesday, May 25th, did she have 8 any visible marks on her face? 10 A No. 12:04:23 11 Q Approximately how far from her in this 12:07:12 12 video were you when she was handing you the key? 13 A We were very close. Arm's length. 14 Q Other than this interaction that you had 15 with Ms. Heard, I think you described other 16 interactions with her and seeing her other times on 17 the security footage; is that right? 18 A Yes. 19 Q So let's see if we can locate some of those 20 other videos. 21 I think you testified, and correct me if 22 I'm wrong, that there are security camens in the 23 elevators in the Eastern Columbia building; is that 24 right? 25 A Yes. 12:05:09 26 A Yes. 12:05:23 1 Q Is that all of the elevators? 2 A Yes. Except for the parking. 3 Q So the elevator going to the penthouse 4 where Mr. Depp and Ms. Heard lived had a security 5 camera in it? 12:05:23 6 A Correct. 7 A No. 8 A Yes. 9 Q So I'm going to and what date was this 10 Gotage taken? 12:05:34 11 A May 25th, 2016, at 1:46 p.m. 12:05:47 13 Lis that how these cameras would be set up, 14 key? 15 A Yes. 15 Q Bear with me while I fast forward a bit. 17 THE VIDEOGRAPHER: I think that's not 18 A No. 12:04:23 1 This with Ms. Heard about the housekeeper 14 key? 16 I where were you when she hade the housekeeper 14 key? 15 A Yes. 16 I did she have 17 A A mber and her interior designer and Raquel 18 Pennington. 18 Pennington in which in the which? Which one 18 Pennington and which one is the interior of esigner and Raquel 18 Pennington. 19 Q Can you identify which is which? Which one 10 is Raquel Pennington and which one is the interior of esigner. 12:07:12 1 defendington. 1 de Carnet. 1 definition. 1 defendington. 1 de Carnet. 1 definition. 1 def
5 Q In your interactions with her, how often 6 did she appear to wear makeup? 7 A Never. 8 Q On this Wednesday, May 25th, did she have 9 any visible marks on her face? 10 A No. 12:04:23 11 Q Approximately how far from her in this 12 video were you when she was handing you the key? 13 A We were very close. Arm's length. 14 Q Other than this interaction that you had 15 with Ms. Heard, I think you described other 15 with Ms. Heard, I think you described other 16 interactions with her and seeing her other times on 17 the security footage; is that right? 18 A Yes. 19 Q So let's see if we can locate some of those 20 other videos. 21 I think you testified, and correct me if 22 I'r myrong, that there are security cameras in the 23 elevators in the Eastern Columbia building; is that 24 right? 25 A Yes. 12:05:23 2 Q So be the elevators? 2 A Yes. Except for the parking. 3 Q So the elevator going to the penthouse 4 where Mr. Depp and Ms. Heard lived had a security 5 camera in it? Q Does this appear to be that elevator? R A Yes. 2 Q Is that all of the elevators? 1 In this video. 2 I think you testified, and correct me if 2 Q Does this appear to be that elevator? 3 Q So the elevator going to the penthouse 4 where Mr. Depp and Ms. Heard lived had a security 5 camera in it? Q Does this appear to be that elevator? R A Yes. 2 I think you can be that elevator? R A The interior designer and Raquel 8 Pennington. 9 Q C an you identify which is which? Which one 10 is Raquel Pennington and which one is the interior designer? 12 A The interior designer. 12:07:12 1 A Correct. 18 Q And Ms. Pennington is directly in front 14 of Amber. 18 Q Ard Ms. Pennington lived in the building 19 also; right? 21 A West about the interior designer? 22 A No. Oh, she did. I don't know if she was 23 still living there at that point. No, she had 24 recently moved. 25 Q We have a frontal shot of Ms. Heard's face 25 Q We have a frontal shot of Ms. Heard's face 26 Ms. Heard's face that are visible? 27 A No. 28 A Yes. 29 In this video, are there any marks on 2
6 did she appear to wear makeup? 7 A Never. 9 A Never. 9 any visible marks on her face? 10 A No. 12-04-23 11 Q Approximately how far from her in this 22 video were you when she was handing you the key? 13 A We were very close. Arm's length. 14 Q Other than this interaction that you had 15 with Ms. Heard, I think you described other 12-04-41 16 interactions with her and seeing her other times on 17 the security footage; is that right? 18 A Yes. 19 Q So let's see if we can locate some of those 20 other videos. 12-04-54 21 I think you testiffed, and correct me if 22 Tm wrong, that there are security cameras in the 23 elevators in the Eastern Columbia building; is that 24 right? 25 A Yes. 12-05-09 27 A Yes. Except for the parking. 3 Q So the elevator going to the penhouse 4 where Mr. Depp and Ms. Heard lived had a security 4 where Mr. Depp and Ms. Heard lived had a security 5 C camera in it? 12-05-23 6 A Correct. 10 Q Does this appear to be that elevator? 20 Q So Does this appear to be that elevator? 3 A Yes. 2 Does this appear to be that elevator? 4 Where Mr. Depp and Ms. Heard what date was this 10 footage taken? 12-05-23 10 A No. Ob. are there are winding the same time that 12 Q Is this approximately the same time that 13 you interacted with Ms. Heard about the housekeeper 14 key? 14 key? 15 A Yes. 12-05-47 16 Q Bear with me while I fast forward a bit, 17 THE VIDEOGRAPHER: I think that's not -
7 A Never. 8 Q On this Wednesday, May 25th, did she have any surjective break on her face? 9 Q Can you identify which is which? Which one 12:07:12 video were you when she was handing you the key? 12 video were you when she was handing you the key? 13 A We vere very close. Arm's length. 14 Q Other than this interaction that you had 15 with Ms. Heard, I think you described other 12:04:41 15 Q The one who is getting on the elevator with 12:07:21 16 a drink in her hand? 17 the security footage; is that right? 18 A Yes. 19 Q So let's see if we can locate some of those 20 other videos. 12:04:54 20 A Yes. 21 I think you testified, and correct me if 22 of the year of the parking. 12:05:09 Page 34 1
8 Q On this Wednesday, May 25th, did she have 9 any visible marks on her face? 10 A No. 12:04:23 11 Q Approximately how far from her in this 12 video were you when she was handing you the key? 13 A We were very close. Arm's length. 14 Q Other than this interaction that you had 15 with Ms. Heard, I think you described other 15 with Ms. Heard, I think you described other 16 interactions with her and seeing her other times on 17 the security Gotage; is that right? 18 A Yes. 19 Q So let's see if we can locate some of those 20 other videos. 12:04:54 21 I think you testified, and correct me if 22 I'm wrong, that there are security cameras in the 23 elevators in the Eastern Columbia building; is that 24 right? 25 A Yes. 20 So the elevator going to the penthouse 26 where Mr. Depp and Ms. Heard lived had a security 27 A Yes. 28 A Yes. 29 Q So I'm going to and what date was this 10 footage taken? 11 Q Is this approximately the same time that 12 video were you when she was handing you the hey? 14 key? 15 A Yes. 12:05:47 16 Q Bear with me while I fast forward a bit. 17 THE VIDEOGRAPHER: I think that's not 12:04:54 16 is Raquel Pennington and which one is the interior designer? 12 A The interior designer Laura Divencer is on 14 the elevator which of Amber. 15 designer? 12 A The interior designer Laura Divencer is on 14 the elevator which of Amber. 15 designer? 12 A The interior designer Laura Divencer is on 14 the elevator with of Amber. 15 designer? 12 A The interior designer Laura Divencer is on 14 the lest and Raquel Pennington is directly in front 14 of Amber. 15 designer? 12 A The interior designer Laura Divencer is on 14 the lest and Raquel Pennington is directly in front 14 of Amber. 15 Q In the hand? 16 a drink in her hand? 17 A Correct. 18 Q And Ms. Pennington is directly in front 14 a drink in her hand? 17 A Correct. 18 Q And Ms. Pennington is directly in front 14 to A Wes. 12:07:21 15 Q What about the interior designer. 16 a drink in her hand? 17 A Ves. (10 A Yes. 12:07:28 20 A Yes. 12:07:28 21 I think you
9 Q Can you identify which is which? Which one 12:07:12 10 A No. 12:04:23 11 Q Approximately how far from her in his 12 video were you when she was handing you the key? 13 A We were very close. Arm's length. 14 Q Other than this interaction that you had 15 with Ms. Heard, I think you described other 16 interactions with her and seeing her other times on 17 the security footage; is that right? 18 A Yes. 19 Q So let's see if we can locate some of those 20 other videos. 21 I think you testified, and correct me if 22 I'm wrong, that there are security cameras in the 23 elevators in the Eastern Columbia building; is that 24 right? 25 A Yes. 26 A Yes. 27 I where Mr. Depp and Ms. Heard lived had a security 28 A Yes. 29 Q So I'm going to the penthouse 4 where Mr. Depp and Ms. Heard lived had a security 5 camera in it? 12:05:23 6 A Correct. 6 Ms. Heard's face that are visible? 7 A No. 8 A Yes. 9 Q So I'm going to and what date was this 10 footage taken? 11 Cade;34 12:07:12 11 designer? 12 A The interior designer Laura Divenere is on 13 the left and Raquel Pennington is directly in front 14 of Amber. 15 Q The one who is getting on the elevator with 16 a drink in her hand? 17 A Correct. 18 Q And Ms. Pennington lived in the building 19 also; right? 20 A Yes. 21 Q We have a frontal shot of Ms. Heard's face 22 A No. Oh, she did. I don't know if she was 23 still living there at that point. No, she had 24 recently moved. 25 Q We have a frontal shot of Ms. Heard's face 26 We have a frontal shot of Ms. Heard's face 27 In this video. 28 A Yes. 29 Q So I'm going to the penthouse 29 A Yes. 20 In this video, are there any marks on 20 So I'm going to and what date was this 20 Is that consistent with how she looked when 21 along the wey of the desk to give you the key? 21 A Yes. 22 Is the consistent with how she looked when 23 she camer up to the desk to give you the key? 24 A Yes. 25 Q Is this approximately the same time that 26 Q Is this approximately the same time that 27 In A No. 28 Q Is there any indication that she had bee
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Page 34 Page 3 Page 34 Page 4 Page 34 Page 4 Page 3 Page 4 Page 34 Page 4 Page 5 Page 4 Page 5 Page 5 Page
Page 34 1 Q Is that all of the elevators? 2 A Yes. Except for the parking. 3 Q So the elevator going to the penthouse 4 where Mr. Depp and Ms. Heard lived had a security 5 camera in it? 12:05:23 6 A Correct. 7 Q Does this appear to be that elevator? 8 A Yes. 9 Q So I'm going to and what date was this 10 footage taken? 11 A May 25th, 2016, at 1:46 p.m. 12 Q Is this approximately the same time that 13 you interacted with Ms. Heard about the housekeeper 14 key? 15 A Yes. 12:05:47 16 Q Bear with me while I fast forward a bit. 17 THE VIDEOGRAPHER: I think that's not 10 In this video. 2 Is that consistent with how she looked when 3 she came up to the desk to give you the key? 4 A Yes. 5 Q In this video, are there any marks on 12:07:58 6 Ms. Heard's face that are visible? 7 A No. 8 Q Is there any indication that she had been 9 struck or hit by a person or an object? 10 A No. 12:08:09 11 Q It looks like she's holding the key in her 12 hand. I'm assuming this is right before she comes 13 to give it to you. 14 key? 15 Where you could see the sequence of events, if you 12:08:23 16 looked at all the cameras together? 17 A Yes.
2 A Yes. Except for the parking. 3 Q So the elevator going to the penthouse 4 where Mr. Depp and Ms. Heard lived had a security 5 camera in it? 12:05:23 6 A Correct. 7 Q Does this appear to be that elevator? 8 A Yes. 9 Q So I'm going to and what date was this 10 footage taken? 11 A May 25th, 2016, at 1:46 p.m. 12 Q Is this approximately the same time that 13 you interacted with Ms. Heard about the housekeeper 14 key? 15 A Yes. 16 Q Bear with me while I fast forward a bit. 17 THE VIDEOGRAPHER: I think that's not 2 Is that consistent with how she looked when 3 she came up to the desk to give you the key? 4 A Yes. 5 Q In this video, are there any marks on 12:07:58 6 Ms. Heard's face that are visible? 7 A No. 8 Q Is there any indication that she had been 9 struck or hit by a person or an object? 10 A No. 12:08:09 11 Q It looks like she's holding the key in her 12 hand. I'm assuming this is right before she comes 13 to give it to you. 14 key? 15 Where you could see the sequence of events, if you 12:08:23 16 Q Bear with me while I fast forward a bit. 17 THE VIDEOGRAPHER: I think that's not 18 A Yes. 19 Is that consistent with how she looked when 3 she came up to the desk to give you the key? 4 A Yes. 19 A Yes. 10 Looks that are visible? 10 A No. 11 Q It looks like she's holding the key in her 12 hand. I'm assuming this is right before she comes 13 to give it to you. 14 Is that how these cameras would be set up, 15 Where you could see the sequence of events, if you 12:08:23
3 she came up to the desk to give you the key? 4 where Mr. Depp and Ms. Heard lived had a security 5 camera in it? 12:05:23 5 Q In this video, are there any marks on 12:07:58 6 A Correct. 6 Ms. Heard's face that are visible? 7 Q Does this appear to be that elevator? 8 A Yes. 9 Q So I'm going to and what date was this 10 footage taken? 11 A May 25th, 2016, at 1:46 p.m. 12 Q Is this approximately the same time that 13 you interacted with Ms. Heard about the housekeeper 14 key? 15 A Yes. 16 Q Bear with me while I fast forward a bit. 17 THE VIDEOGRAPHER: I think that's not 18 A Yes. 19 A Yes. 10 A Yes. 11 A Yes. 12:05:24 13 she came up to the desk to give you the key? 4 A Yes. 5 Q In this video, are there any marks on 12:07:58 6 Ms. Heard's face that are visible? 7 A No. 8 Q Is there any indication that she had been 9 struck or hit by a person or an object? 10 A No. 11 Q It looks like she's holding the key in her 12 hand. I'm assuming this is right before she comes 13 to give it to you. 14 key? 15 where you could see the sequence of events, if you 12:08:23 16 looked at all the cameras together? 17 A Yes.
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6 A Correct. 7 Q Does this appear to be that elevator? 8 A Yes. 9 Q So I'm going to and what date was this 10 footage taken? 11 A May 25th, 2016, at 1:46 p.m. 12 Q Is this approximately the same time that 13 you interacted with Ms. Heard about the housekeeper 14 key? 15 A Yes. 16 Q Bear with me while I fast forward a bit. 17 THE VIDEOGRAPHER: I think that's not 6 Ms. Heard's face that are visible? 7 A No. 8 Q Is there any indication that she had been 9 struck or hit by a person or an object? 10 A No. 12:08:09 11 Q It looks like she's holding the key in her 12 hand. I'm assuming this is right before she comes 13 to give it to you. 14 Is that how these cameras would be set up, 15 where you could see the sequence of events, if you 12:08:23 16 I looked at all the cameras together? 17 A Yes.
6 A Correct. 7 Q Does this appear to be that elevator? 8 A Yes. 9 Q So I'm going to and what date was this 10 footage taken? 11 A May 25th, 2016, at 1:46 p.m. 12 Q Is this approximately the same time that 13 you interacted with Ms. Heard about the housekeeper 14 key? 15 A Yes. 16 Q Bear with me while I fast forward a bit. 17 THE VIDEOGRAPHER: I think that's not 18 Q Is there any indication that she had been 9 struck or hit by a person or an object? 10 A No. 12:08:09 11 Q It looks like she's holding the key in her 12 hand. I'm assuming this is right before she comes 13 to give it to you. 14 Is that how these cameras would be set up, 15 where you could see the sequence of events, if you 12:08:23
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8 A Yes. 9 Q So I'm going to and what date was this 10 footage taken? 11 A May 25th, 2016, at 1:46 p.m. 12 Q Is this approximately the same time that 13 you interacted with Ms. Heard about the housekeeper 14 key? 15 A Yes. 16 Q Bear with me while I fast forward a bit. 17 THE VIDEOGRAPHER: I think that's not 18 Q Is there any indication that she had been 9 struck or hit by a person or an object? 10 A No. 12:08:09 11 Q It looks like she's holding the key in her 12 hand. I'm assuming this is right before she comes 13 to give it to you. 14 Is that how these cameras would be set up, 15 where you could see the sequence of events, if you 12:08:23
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11 A May 25th, 2016, at 1:46 p.m. 12 Q Is this approximately the same time that 13 you interacted with Ms. Heard about the housekeeper 14 key? 15 A Yes. 16 Q Bear with me while I fast forward a bit. 17 THE VIDEOGRAPHER: I think that's not 18 It looks like she's holding the key in her 19 hand. I'm assuming this is right before she comes 10 to give it to you. 11 Is that how these cameras would be set up, 12:08:23 13 to give it to you. 14 Is that how these cameras would be set up, 15 where you could see the sequence of events, if you in the properties of the pro
12 Q Is this approximately the same time that 13 you interacted with Ms. Heard about the housekeeper 14 key? 15 A Yes. 16 Q Bear with me while I fast forward a bit. 17 THE VIDEOGRAPHER: I think that's not 18 hand. I'm assuming this is right before she comes 19 to give it to you. 19 Is that how these cameras would be set up, 19 where you could see the sequence of events, if you 12:08:23 19 Is the power of events, if you 12:08:23 10 Is this approximately the same time that 11 Is that how these cameras would be set up, 12 Is the power of events, if you 12:08:23 13 to give it to you. 14 Is that how these cameras would be set up, 15 where you could see the sequence of events, if you 12:08:23 16 Is looked at all the cameras together? 17 A Yes.
13 you interacted with Ms. Heard about the housekeeper 14 key? 15 A Yes. 16 Q Bear with me while I fast forward a bit. 17 THE VIDEOGRAPHER: I think that's not 18 to give it to you. 19 Is that how these cameras would be set up, 19 where you could see the sequence of events, if you 12:08:23 19 Is to give it to you. 10 Is that how these cameras would be set up, 11 Is where you could see the sequence of events, if you 12:08:23 11 Is looked at all the cameras together? 12 In A Yes.
14 key? 15 A Yes. 16 Q Bear with me while I fast forward a bit. 17 THE VIDEOGRAPHER: I think that's not 18 Is that how these cameras would be set up, 19 where you could see the sequence of events, if you 10 looked at all the cameras together? 11 A Yes.
15 A Yes. 12:05:47 15 where you could see the sequence of events, if you 12:08:23 16 Q Bear with me while I fast forward a bit. 16 looked at all the cameras together? 17 THE VIDEOGRAPHER: I think that's not 17 A Yes.
16 Q Bear with me while I fast forward a bit. 16 looked at all the cameras together? 17 THE VIDEOGRAPHER: I think that's not 17 A Yes.
17 THE VIDEOGRAPHER: I think that's not 17 A Yes.
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19 MS. BILES: Got it. 19 in case I didn't say that.
20 BY MS. BILES: 12:06:21 20 Up next we have 204 C. 12:08:46
21 Q I see a PH there. 21 BY MS. BILES:
22 Does that mean it's the elevator stop for 22 O Ms. Espanza what is the date that this
23 the penthouse? 23 footage was recorded?
23 the penthouse? 23 footage was recorded?

1 video?	1 Q Which one is her sister Whitney?
2 A It was that was just the penthouse	2 A In the middle.
3 elevator opening at the mezzanine level.	3 Q In the black coat?
4 Q Okay. Let me see if I can skip a bit	4 A Yes.
5 ahead. 12:09:19	5 Q And the people that you said you've seen 12:14:56
6. This is showing the comings and goings of	6 but you don't know who they were, which ones are
7 various residents of the building, I assume; is that	7 those?
8 right?	8 A The two people in front of her. I don't
9 A Correct.	9 know if that's IO or AO. I don't think so, though.
10 Q Do you recognize that woman? 12:10:23	10 Q Did you see them in the building or did you 12:15:09
11 What about that man?	11 see them with Ms. Heard?
12 A Yes. Alex.	12 A Yeah. I've seen them in the building
13 Q Let's see if we can get a better shot of	13 before.
14 the woman.	14 Q Who's outside the elevator?
Where is the elevator stopping? 12:11:23	15 A Amber Heard. 12:15:20
16 A Penthouse.	16 Q What does she appear to be doing?
17 Q How many penthouse units were there in the	17 A There's Raquel.
18 building?	18 She's looking in her purse for something
19 A There's PH 1 through PH 5. Then there's	19 and has something in her mouth.
20 1211 and 1212 which also and 12 yeah. Those 12:11:36	20 Q Now, do you recognize the woman now that we 12:15:37
21 two go up to that level, too. They have two patios	21 have a facial shot of her?
22 over there. And 1210. But only five.	22 A I don't know her name.
23 Q In 2016, other than Mr. Depp and Ms. Heard	23 Q What, if anything, do you know about her?
24 and Raquel Pennington and her fiance, was anyone	24 A I just seen her come to visit.
25 else living on the penthouse? 12:12:03 Page 38	25 Q Who did she come visit? 12:15:57 Page 40
1 A Yes. Isaac was living in PH 2 and	1 A Amber.
2 previously in the year her sister was living there	2 Q And let's pause right let me back up and
3 as well.	3 pause for one moment.
4 Q When you say "her sister," who are you	4 A Oh, that's IO or what's her name?
5 referring to? 12:12:12	5 Q I'm sorry. Who? 12:16:13
6 A Whitney Heard.	6 A It's like IO or AO.
7 Q Amber Heard's sister Whitney?	7 Q Who is that?
8 A Correct.	8 A She's one of her friends. She's a writer.
9 Q And who was Isaac?	9 Q Thank you for being patient with my video
10 A Isaac is one of Johnny's friends. He was 12:12:20	10 handling. 12:16:34
11 one of their mutual friends. He's an artist.	11 Okay. You described earlier a point in
12 Q I think we're almost where we need to be.	12 time on Friday, May 27th, when Ms. Heard had some
13 Do you recognize this resident?	13 sort of cut or mark on her face; is that right?
14 I'm assuming she's a resident.	14 A Right.
15 Do you recognize her? 12:13:20	15 Q Where was that located on her face? 12:16:52
16 A Yes.	16 A On her right eye and cheek.
17 Q Who is that?	17 Q Is that part of her face visible in this
18 A She used to I think I thought that	18 May 25th, 2016, surveillance video?
19 was the lady that used to live in 707, but now I	19 A Yes.
20 don't think so. 12:13:35	20 Q You can clearly see her right cheek and 12:17:05
21 Q Maybe we'll get a better shot.	21 face?
Do you recognize that woman, either of	22 A Yes.
23 them?	23 Q Is the same mark that you described seeing
24 A There's her sister Whitney. I've seen	24 on Friday, May 27th, visible on her face
25 them, but I don't know who they are. 12:14:48	25 A No. 12:17:15

1 Q in this video?	1 What prompted you to go back and review
2 And the way Ms. Heard looks in this video,	2 security footage on Friday, May 27th, 2016?
3 is that the same or different from how she looked	3 A The mark on her face.
4 when you talked with her at the front desk on	4 Q Why did the mark on her face prompt you to
5 May 25th? 12:17:27	5 go back and look at security footage? 12:20:53
6 A It's the same.	6 A Can you rephrase that question?
7 Q And at any point if you recognize any of	7 Q Sure.
8 these people, let me know.	8 You testified that you went back and looked
9 A It's Raquel and her sister and IO.	9 at security footage on Friday, May 27th because of
10 Q Which one is IO, the hat girl, or this one? 12:17:50	10 the mark that you saw on Ms. Heard's face. 12:21:30
11 A The short haired onc.	11 Did I understand that part right?
12 Q How do you spell IO?	12 A Yes.
13 A A-O or I-O or something.	13 Q So my
14 I'm not 100 percent positive that's her,	14 A I'm not sure that was the day. I knew I
15 but it looks like her. But then she cut her hair 12:18:11	15 went back several times. 12:21:41
16 later, so I don't yeah, it's her. That's her.	16 Q When you say "several times," approximately
17 Sorry.	17 how many times did you go back and look at security
18 Q Where are they in the building right now?	18 footage?
19 A They're on the mezzanine level.	19 A Of different instances probably 10, 15
20 Q What is on the mezzanine level? 12:18:25	20 times. 12:21:55
21 A The mailroom and the exit to the parking.	21 Q Why were you doing that?
22 Q So there was an attached parking garage?	22 A Because of the allegations.
23 A Correct.	23 Q What about the allegations made you want to
24 Q And what time is showing on this video?	24 go back and look at security footage?
25 A 1921, so is that 7:21? 12:18:42	25 A Because it didn't the time didn't add up 12:22:13
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I Oh, no. I was right. 7.	1 and so I was questioning it.
2 Q So where are they exiting?	2 Q When you say you were questioning it, I
3 A They're exiting the penthouse elevator to	3 just want to make sure for the record that we're
4 the mezzanine level.	4 clear on what exactly you were questioning.
5 Q And if you go right on the mezzanine level, 12:19:19	5 A The mark on her face and the allegations 12:22:32
6 are you going to one particular place, or is it	6 that were made.
7 aiways	7 Q So I'm trying to think of a way to phrase
8 A You can go to the mailroom and then you can	8 this.
9 go to the parking garage elevator and you can go to	9 So why were you questioning the mark on her
10 the top level parking spaces. 12:19:38	10 face and the allegations that were made? 12:22:51
11 Q So those are clips that we have from	11 A Because I saw her several times and I
12 Wednesday, May 25th, 2016. We also have some clips	12 didn't see that on her face.
13 from earlier in the week, May 24th, 2016.	13 Q And so what were you thinking about that?
14 I believe you testified that you had some	14 A That the allegations were false.
15 interactions with Ms. Heard earlier in the week as 12:20:01	15 Q When you went back and looked at security 12:23:10
16 well; is that right?	16 footage 10 to 15 times, did that change your belief
17 A Yes.	17 that the allegations were false?
18 Q In addition to interacting with her, did	18 A No.
19 you go back and view security footage?	19 Q When you looked at the security footage 10
20 A Yes. 12:20:13	20 or 15 times, what did you then think about 12:23:28
21 Q When did you do that?	21 Ms. Heard's allegation that she had been assaulted
22 A On Friday, I believe.	22 by Mr. Depp?
23 Q Friday, May 27th	23 A It was false.
24 A Yes.	24 Q I want to go back and look at some more
25 Q 2016? 12:20:32	25 video from May 24th, 2016. 12:23:42
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1 Is that you at the front desk?	l A Yes.
2 A Yes.	2 Q Who is that?
3 Q Do you recognize that resident?	3 A Whitney, Raquel and Amber.
4 A Yes.	4 Q Do you have a clearer shot of Amber's face
5 Q Who is that resident? 12:23:54	5 in this video? 12:26:53
6 A Amber.	6 A Yes.
7 Q That's Amber?	7 Q Do you see what side of her face do you
8 A Isn't it? Oh, that's her sister Whitney.	8 see?
9 I think.	9 A Right.
10 Let me check. Can you go back? 12:24:04	10 Q Do you see any marks, bruises or cuts on 12:26:59
11 Q Sure.	11 her face?
12 A Sorry. I wasn't paying attention.	12 A No.
13 Q That's okay. I've done that several times	13 Q What part of Amber's face is visible in
14 with them, too. They're practically twins.	14 this video?
15 A Yeah, that's Amber. 12:24:22	15 A Her ear, right side of her face, cheek, and 12:27:40
16 Q So what date was this filmed?	16 eye.
17 A This was May 24th, 2016.	17 Q Do you see any marks, cuts or bruises?
18 Q What is she doing in this video?	18 A No.
19 A Someone had dropped something off for her,	19 Q Later in the week on approximately May 27th
20 and so I let her know and she came down to pick it 12:24:47	20 when Ms. Heard did have marks or bruises or cuts on 12:27:52
21 up.	21 her face, were they located in the part of her face
22 Q She came down to the front desk to pick it	22 that's now visible on this video?
23 up?	23 A Yes.
24 A Yes.	24 Q So looking at this video from May 24th,
25 Q Was she wearing makeup at that time? 12:24:52	25 there's no marks or cuts or bruises there? 12:28:07
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1 A No.	1 A Correct.
2 Q Approximately how far away from her were	2 Q And I think you identified these other
3 you?	3 people as Whitney Heard over by the elevator panel;
4 A Like very close. Like my arm like	4 is that right?
5 two feet. 12:25:07	5 A Yes. 12:28:26
6 Q When she came to pick up her package, did	6 Q And then who is the other woman?
7 you see any marks on her face? Cuts? Bruises?	7 A Raquel Pennington.
8 A No.	8 Q At this point were both Raquel Pennington
9 Q Did you see anything that suggested that	9 and Whitney Heard residents of the building?
10 she had been hit by a person or an object or 12:25:16	10 A Just Raquel. 12:28:39
11 anything?	11 Q Whitney Heard has been in a lot of these
12 A No.	12 videos.
13 Q So that was 204 D.	13 Was she a frequent guests of Amber's?
14 Let's go to 204 E.	14 A Yes.
15 What is this footage of? 12:25:47	15 Q Did Amber have any other frequent guests 12:28:49
16 A The elevator.	16 when she was a resident of East Columbia?
17 Q Which elevator?	17 A Yes.
18 A Penthouse elevator.	18 Q Can you identify guests that you recall
19 Q When was this shot?	19 seeing?
20 A May 24th, 2016. 12:25:57	20 A Her friend IO, Laura Divenere, Samantha 12:28:58
21 Q And there's a resident. Let's see if we	21 I forget some of the other people's names.
22 can get to the right part of this.	22 Q Okay. I think all of those people that you
23 What time of day is this?	23 identified were female.
24 A It was evening. It would be 2117, so 9:17.	24 Did she have any male guests at any point
25 Q Do you recognize that person? 12:26:42	25 that you're aware of? 12:29:24
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1 A Yes.	1 Q You mentioned a third person, a shaggy
2 Q Who were some of her male guests?	2 haired guy.
3 A She had a computer guy coming in, Elon	3 Who was the shaggy haired guy?
4 Musk.	4 A I think he was a makeup artist or
5 Q Anyone else? 12:29:38	5 something. Or like a design clothing she had 12:32:08
6 A One guy with long shaggy hair that I don't	6 some people come this was prior to the incident.
7 know his name.	7 Yeah.
8 Q Let's back up and take those one by one.	8 Q Going back to Mr. Musk.
9 You mentioned a computer guy.	9 What time of day was it when you fobbed
10 How do you know he was a computer guy? 12:29:57	10 him? 12:32:22
11 A Because she dropped off her computer and he	11 A The morning.
12 picked up her computer from me.	12 Q The morning.
13 Q So he wasn't a guest in her apartment; is	13 Was it when you first went to work or was
14 that right?	14 it later in the day?
15 A He did go up to her apartment. 12:30:08	15 A It was relative it was probably 12:32:31
16 Q When was that?	16 9:00 o'clock. 9:30, maybe.
17 A The following week.	17 Q And that was on a weekday?
18 Q The following week of May the last week	18 A Correct.
19 of May 2016; is that right?	19 Q Do you recall if it was more towards the
20 A Correct. 12:30:18	20 beginning of the week or more towards the end of the 12:32:41
21 Q Okay. You mentioned Elon Musk. When was	21 week?
22 Mr. Musk a guest of Amber Heard at East Columbia?	22 A Tucsday, Wednesday.
23 A After she had filed for divorce.	23 Q Of either the week of the 21st or the week
24 Q When was that?	24 of the 28th?
25 A That I know of. 12:30:31	25 A Correct. 12:32:55
Page 50	Page 52
1 Q When do you recall specifically seeing	Q Do you recall seeing Mr. Musk visit
2 Mr. Musk as a guest?	2 Ms. Heard at other times?
3 A I believe I fobbed him up. If you have	3 A Yes.
4 guests, they have to be sent up with a key fob. The	4 O When were those times?
5 elevators, you can't just press a button without it. 12:30:50	5 A I know there are many times. 12:33:07
6 Q When do you recall fobbing up Mr. Musk?	6 Q In relation to the time when Ms. — when
7 A The following week.	7 Ms. Heard appeared with the visible marks on her
8 Q "The following week" meaning the last week	8 face, did Mr. Musk visit her at any time around that
9 of May 2016?	9 date?
10 A I'm not a 100 percent certain. I know it 12:31:02	10 A Yes. 12:33:29
11 was within it could have been it was in a	11 Q Can you tell me what you recall about that?
12 very it was in either of those two weeks.	12 A I can't exactly recall if it was I feel
13 Q "Either of those two weeks," meaning the	13 like it was I might have seen him on camera on a
14 week of the 21st onward or the following week after	14 Thursday. I remember
15 the 27th? 12:31:26	15 Q When you say you might have saw him on a 12:34:06
16 A Correct. I think there were several times.	16 camera, do you recall which camera you think you saw
17 Q When you fobbed Mr. Musk up to Ms. Heard's	17 him on?
18 penthouse, how long did he stay, do you know?	18 A Well, it was after I the penthouse
19 A I fobbed him to his car, so he had come	19 elevator camera.
20 down and he needed to get back to the mezzanine 12:31:44	20 Q And you think 12:34:24
21 level where his car was parked.	21 A In the mezzanine area.
22 Q I see.	22 Q When do you think that was in relation to
23 Did you observe how long he had been a	23 when Ms. Heard appeared with these marks on her
24 guest in her penthouse?	24 face?
25 A I don't know. 12:31:55	25 A After, 12:34:35
Page 51	Page 53

	T
1 Q After. Okay.	1 the building in the morning and Mr. Romero had let
2 You mentioned that you had seen Mr. Musk at	2 him into the building the night before?
3 the Eastern Columbia building many times.	3 A He had told me that Amber called to open
4 Do you recall when the first time you saw	4 the garage gate for him.
5 Mr. Musk in the building was? 12:34:56	5 Q For who? 12:37:17
6 A It was the first time that I fobbed him to	6 A Her friend Elon.
7 his car.	7 Q I see.
8 Q Is that the time you just described, May of	8 Other than the conversation that you've
9 2016?	9 just described with Mr. Romero, were there any other
10 A Correct. 12:35:13	10 times that Mr. Romero indicated to you that he had 12:37:28
11 Q Before you personally saw Mr. Musk in the	11 seen Mr. Musk in the building?
12 Eastern Columbia building, had you heard from anyone	12 A Yes.
13 else that they had seen him in the building?	13 Q Can you tell us about those times?
14 A Yes.	14 A He just mentioned that she had her friend
15 Q Tell us about that. 12:35:24 16 A Alex told me that he had been visiting her.	15 Elon come over. 12:37:48
17 Q When you say "Alex," are you talking about	16 Q When you say "he," are you talking about 17 Alex?
18 your employee Alex?	· · · · · · · · · · · · · · · · · · ·
19 A Alex is not my employee. He works for the	18 A Alex, yes. 19 Q When did Alex mention that to you?
20 building, for Action Property Management. 12:35:42	20 A I can't recall. 12:37:57
21 Q But it's Alex Romero?	21 Q Do you recall if it was before or after the
22 A Correct.	22 conversation that you described for May of 2016?
23 Q When do you recall Alex Romero telling you	23 A After.
24 that he had seen Mr. Musk visiting Ms. Heard?	24 Q After. Okay.
25 A Well, he mentioned it to me yesterday. 12:35:57 Page 54	25 A But he did mention that he'd seen him there 12:38:12 Page 56
1 Q Okay. But earlier in time, had he	1 previously.
2 mentioned that to you?	2 Q When he said that he had seen him
3 A Yes.	3 previously, when was he talking about, to your
4 Q When had he mentioned it to you before?	4 understanding?
5 A I asked him I told him that I I told 12:36:10	5 A When Johnny hurt his finger, which is 12:38:25
6 him that I fobbed Elon up this morning and I asked	6 like
7 him if he had seen him before.	7 Q Okay. Can you unpack that and tell me a
8 Q So this conversation between you and Alex	8 little bit about what you're talking about.
9 took place in May of 2016?	9 A Alex said that she started having Elon come
10 A Yes. 12:36:35	10 over and that he thought it was a little messed up 12:38:43
11 Q On whatever day it was that you fobbed	11 because Johnny was away and he didn't know what was
12 Mr. Musk to his car?	12 going on.
13 A Yes.	13 Q When was that?
14 Q When you ask Mr. Romero if he had seen	14 A After he had hurt his finger.
15 Mr. Musk in the building before, what did he tell 12:36:44	15 Q Do you recall when that was? 12:38:56
16 you?	16 A 2015, like
17 A He said yes.	17 Q So it's your understanding from Alex that
18 Q Can you tell us everything you remember	18 Alex had seen Mr. Musk visiting Ms. Heard in the
19 about it?	19 Eastern Columbia building in 2015?
20 A He said that he saw him last night. 12:36:50	20 A Yes. 12:39:22
21 Q "Last night" meaning	21 Q Let's go back and look at some additional
22 A He had came the night before.	22 video. We're on 204 E, I believe.
23 Q I see.	23 What is this footage showing?
From your conversation with Mr. Romero, was	24 A This is the penthouse elevator.
25 it your understanding that you let Mr. Musk out of 12:37:02 Page 55	25 Q What is the date? 12:40:07 Page 57

			,			
1	Α	May 24th.	1	(Q	When you say he looked tired or like he had
2	Q	Who's getting on this elevator?	2			oken up, what led you to conclude that?
3	Α	Amber, Raquel and her sister.	3	_		His hair was messy.
4	Q	I'm going to pause it there.	4)	Anything else?
5		Is that Amber standing with her back to the 12:40:24	5		-	No. 12:42:38
6 e		tor doors?	6			Let's take a look at another video. This
7	Α	Yes.	l	is 2	•	· · · · · · · · · · · · · · · · · · ·
8	0	Is her face visible in this video?	8			What is this footage of, Ms. Esparza?
9	A		9			Penthouse elevator.
10		What is the date of this video again? 12:40:33	10			
11	_	May 24th, 2016.	11		•	And what is the date of this? 12:43:00 May 22nd, 2016.
12		At what time?	12			And what time is it?
13	~	11:18 p.m.	13		•	
14		What part of Ms. Heard's face is visible in				1:06 p.m.
	-		14		•	Who is that?
1		ideo? 12:40:46	15			That's Amber. 12:43:09
16	_	Her right side.	16			Let's back up for a second.
17	Q	•	17			n relation to when the police were called
ì	•	ght side of her face on this?	l			penthouse —
19		No.	19			Yes.
20		Is that the same part of her face visible 12:40:55	20			when was this footage shot? 12:43:18
i		ater in the week she appeared with marks or	21	A		The next day.
\		es on?	22	Ç	•	There's a shot of Ms. Heard's face.
23	Α	Yes.	23		Ι	Do you see her face clearly?
24	Q	And there is a full frontal shot of her	24	A	١.	Yes.
25 fa	ace.	12:41:10	25	Ç	5	Do you see any marks or cuts or bruises on 12:43:30
		Page 58				Page 60
1	1	Do you see any signs of injury to her face?	1	her	fac	ee?
2	Α	No.	2	A	Ĺ.	No.
3	Q	Do you see any signs that she's been hit or	3	Ç)	Do you see any indication that she has been
4 st	truck	by a person or an object?	4	hit c	or s	struck?
5	Α	No. 12:41:20	5	Α		No. 12:43:39
6	Q	Is that consistent with how Ms. Heard	6	Ç)	Let's see where she's going.
7 lc	ooke	d the week of after May 21st and your	7		Į	believe you testified earlier that on
8 ir	ntera	ctions with her?	8	May	y 2	2nd, your employee Cornelius had an interaction
9	Α	Yes.	l			fs. Heard; is that right?
10	Q	Where are they getting off? 12:41:32	10	Α		Yes. 12:44:24
11	A		11	Ç	}	So this footage is shot the same day that
12	Q	And is that the elevator stop for	12			arrell interacted with her?
	-	leard's apartment?	13			Yes.
14		Yes.	14			Do you recall about what time of day it was
15	0				-	the texted you and excitedly told you he met 12:44:32
1	•	Eastern Columbia building in May of 2016. I		her's		,
1		you said it was around 9:00 in the morning	17	A		I don't recall the time.
1		you were at work; is that right?	18	C	_	Do you recall what time
19		Yes.	19		-	It was like I forget what time. I know
20	Q	What was his physical appearance like at 12:42:12				nink it was like 12:44:45
21 th	•		21	Y		Is that her again?
22		He looked tired or like he just woke up.	22	A	•	<u>-</u>
	_		ł	_		Yeah, it is. So this was about the time.
23	Q	What was he wearing?	23	day		Was he working at around 1:00 o'clock that
24	A	Something casual. Just like a T-shirt and	1	day		Correct Veek it was 1:00 state-traket - 10:44:66
25 p	ഷദ്യ.	. 12:42:27 Page 59	25	Α	·	Correct. Yeah, it was 1:00 o'clock that he 12:44:56 Page 61
L			1			= "Q

1 did. 1:15 he text me.	1 A It's the mezzanine level, the entry the
2 Q Is that her again?	2 doors that come into the mailroom and go to the
3 A Yes.	3 parking.
4 Q And she has some packages in her hands it	4 Q And what date was this footage shot?
5 looks like? 12:45:05	5 A May 22nd, 2016. 12:48:21
6 A Yes.	6 Q Who is that in the footage?
7 Q Where was she getting back on the elevator	7 A Amber.
8 from?	8 Q Where is she going?
9 A The lobby.	9 A To the parking garage.
10 Q Okay. Let's look at another video. 12:45:18	10 Q And what time is this? 12:48:29
11 What is this footage of?	11 A 1:03 p.m.
12 A The hallway by the package room.	12 Q There's someone else about to walk through.
13 Q Pause for one second.	13 That's why we're still looking. I want to see if
14 This is 204 F.	14 you can help me identify the person or recognize
15 MR. WRENSHALL: Isn't it G? 12:45:45	15 him. 12:48:53
MS. BILES: I may have lost track.	16 Do you recognize that person?
17 204 G.	17 A Yes.
18 BY MS. BILES:	18 Q Who is that?
19 Q What is this footage of?	19 A Jay Fagnano.
20 A The hallway, the package room, the 12:45:58	20 Q Is he a resident in your building? 12:49:30
21 bathroom, the general manager's door. There's	21 A Yes.
22 Cornelius and Amber.	22 Q Let me go back. Okay.
23 Q Let me back that up.	What is this footage of?
Where is the package room in this shot?	24 A Penthouse elevator.
25 A To the right. The far right. 12:46:11	25 Q And when was this shot? 12:49:58
Page 62	Page 64
1 Q The very bottom door?	1 A May 22nd.
2 A Correct.	2 Q Is that a resident of the building?
3 Q What was Cornelius's job on May 22nd?	3 A Yes.
4 A He was a concierge.	4 Q To go to and from the penthouse, is this
5 Q Did he sit at the front desk where you sit 12:46:25	5 the only elevator? 12:50:23
6 during the week?	6 A Well, you can go you can use the other
7 A Yes.	7 elevators, you just have to take the stairs.
8 Q I saw a head pass.	8 Q I see. This is the only one that goes
9 Is that Mr. Harrell and Ms. Heard?	9 directly from the lobby to the penthouse?
10 A Yes. 12:46:41	10 A Yes. 12:50:36
11 Q How big is the package room?	11 Q Bear with me. I'm trying to get to the
12 A It's not very big. It's about I'd say	12 right spot.
13 about say like this table to the wall, so like	What time of day is this on May 22nd?
14 eight feet by I don't know 15.	14 A 6:19.
15 Q If two people are in the package room 12:47:18	15 Q When in relation to the police being called 12:51:08
6 together, how close to each other are they	16 to the penthouse was this footage shot?
17 typically?	17 A The next day.
18 A Very close.	18 Q Who is that?
19 Q Who is that that you see at the bottom of	19 A Amber.
20 the screen? 12:47:32	20 Q Is she going up or down? 12:51:39
21 A Amber.	21 A She's going up.
22 Q Who is that?	22 Q So in these video clips, how does Amber
23 A Cornelius.	23 appear to you?
24 Q I guess we're on to H now.	24 A Fine.
What is this footage of camera 13? 12:48:06	25 Q Does she in your observations of her 12:52:08
Page 63	Page 65

1 over the time she lived in the Eastern Columbia	1	Α	Uh-huh.
2 building, did she appear in these video clips to be	2	Q	Okay. Let's look at video I, 204 I.
3 acting the same or different from how she typically	3		What is this a footage of?
4 acted?	4	Α	Two residents going to the pool.
5 Let me rephrase the question. 12:52:31	5	Q	What is the 12:55:53
6 You've interacted with Ms. Heard a lot when	6	A	May 22nd.
7 she lived in the Eastern Columbia building; is that	7	Q	Of what year?
8 right?	8	Α	2016.
9 A Yes.	9	Q	What is the security camera aimed on?
10 Q And you also observed her a lot on the 12:52:40	10	Α	The penthouse elevator. 12:56:01
11 security videos; is that right?	11	Q	What time of day is it?
12 A Yes.	12	Α	1836. So 6:36.
13 Q In the videos that we've been watching	13	Q	Where is the elevator stopped?
14 today that date from May 22nd, 2016 to May 25th,	14	Α	Penthouse level.
15 2016, does she appear to be acting the way she 12:52:54	15	Q	Do you recognize that person? 12:56:
16 normally acted or does she appear to be acting	16	Α	Yes.
17 differently?	17	Q	Who is that?
18 A Little different.	18	Α	Josh.
19 Q In what way?	19	Q	Josh?
20 A Little frazzled. 12:53:06	20	Α	Raquel's fiancé. 12:56:37
21 Q How so?	21	Q	Who is the other person on the elevator?
22 A She was interacting with her friends a	22	Α	Amber.
23 lot, going up and down a little bit more than usual.	23	Q	What does she appear to be doing in the
24 Q Well, can we determine from looking at the	24	video	o?
25 videos that were selected because she was in them, 12:53:40 Page 66	25	A	Talking on the phone. 12:57:00 Page
I whether she was going up and down more than usual,	1	Q	What is she doing now?
2 or is it just that we're looking at videos of her?	2	Α	Exiting the elevator.
3 A Maybe.	3	Q	At what level?
4 Q So she's	4	Α	The lobby.
5 A Yeah. I don't know. Sorry about that. 12:53:52	5	Q	Next we're on I'm marking this as 204 J. 12:57:27
6 Q And the same thing with the friends, how	6		What is this a shot of?
7 often did you normally see Ms. Heard with Raquel	7	Α	The penthouse elevator.
8 Pennington?	8	Q	What's the date?
9 A I would see Raquel every day and I would	9	A	May 22nd, 2016.
10 see I didn't see them together that often. 12:54:12	10	Q	And what's the time? 12:57:42
11 Q What about Ms. Heard and her sister, how	11	A	2251. So 8:51.
12 often were they together?	12	Q	In relation to when the police were called
13 A Again, I would see Whitney by herself when	13	to the	penthouse, when was this footage shot?
14 she was here and not not it was not that	14	Α	The next day.
15 often. 12:54:40	1	0	Who is that? 12:58:12
16 Q Who did you see Ms. Heard with the most	15	Q	17.10 13 dide. 12.50.12
10 Q Who did you see twis. Heard with the most	15 16	A	Amber.
17 when you saw her with someone else?	1	•	
	16	A	Amber.
17 when you saw her with someone else?	16 17	A Q	Amber. Where is she going, can you tell?
17 when you saw her with someone else? 18 A Laura Divenere.	16 17 18	A Q A	Amber. Where is she going, can you tell? The lobby. Mezzanine level.
 17 when you saw her with someone else? 18 A Laura Divenere. 19 Q I think you said that's her interior 	16 17 18 19	A Q A Q	Amber. Where is she going, can you tell? The lobby. Mezzanine level. What is on the mezzanine level?
17 when you saw her with someone else? 18 A Laura Divenere. 19 Q I think you said that's her interior 20 decorator? 12:55:06 21 A Uh-huh.	16 17 18 19 20	A Q A Q	Amber. Where is she going, can you tell? The lobby. Mezzanine level. What is on the mezzanine level? The parking garage and the mailroom. 12:59:02 What time is this in the video?
17 when you saw her with someone else? 18 A Laura Divenere. 19 Q I think you said that's her interior 20 decorator? 12:55:06 21 A Uh-huh.	16 17 18 19 20 21	A Q A Q A	Amber. Where is she going, can you tell? The lobby. Mezzanine level. What is on the mezzanine level? The parking garage and the mailroom. 12:59:02 What time is this in the video? 8:56 p.m no. Wait.
17 when you saw her with someone else? 18 A Laura Divenere. 19 Q I think you said that's her interior 20 decorator? 12:55:06 21 A Uh-huh. 22 Q Did you frequently see Ms. Heard with	16 17 18 19 20 21 22	A Q A Q A	Amber. Where is she going, can you tell? The lobby. Mezzanine level. What is on the mezzanine level? The parking garage and the mailroom. 12:59:02 What time is this in the video? 8:56 p.m no. Wait. It's 10:56 p.m.
17 when you saw her with someone else? 18 A Laura Divenere. 19 Q I think you said that's her interior 20 decorator? 12:55:06 21 A Uh-huh. 22 Q Did you frequently see Ms. Heard with 23 anyone else other than Laura Divenere?	16 17 18 19 20 21 22 23	A Q A Q A	Amber. Where is she going, can you tell? The lobby. Mezzanine level. What is on the mezzanine level? The parking garage and the mailroom. 12:59:02 What time is this in the video? 8:56 p.m no. Wait.

1 Q Who is that? 2 A A hande. 3 Q Is that Ms. Heard? 4 A Yes. A male with a hat on looking down. 5 Q Now what are they doing? 6 A They've touching heads. 7 Q Is this someone you accognize? 8 A Not at this angle. 9 Q Let's back up and see if we can get him 10 again. Just missed him getting on. 11 Recognize? 12 He appears to be keeping his head down, 13 doesn't he? 14 A Correct. 15 Q Are the cameras visible in the elevator? 16 A Yes. 17 Q So if you were getting on the elevator, 18 would you see a camera? 19 A Yes. 20 Q Where would you see the camera? 21 A In the right-hand corner. 22 Vindy of corner of the min backs down when 24 they get on? 25 A No. 26 (Any you give us some examples of when you 5 have seen that? 27 Q So in you give us some examples of when you 5 have seen that? 28 (Q Can you give us some examples of when you 5 have seen that? 39 Q Let's poback up and see if we can get him 40 A Correct. 41 Q Lat's ty that one, which I've lost track 9 where my marking is. 41 Like the right camera, the right time? 42 Like the right camera, the right time? 43 A Isst now. 44 Q Can you give us some camen? 45 A Ves. 46 Q Cokay. Do you think it might have been 7 video 36? 48 Let's ty that one, which I've lost track 9 where my marking is. 40 Like the right camera, the right time? 41 A Correct. 41 Q Let's ty that one, which I've lost track 9 where my marking is. 41 Like the right camera, the right time? 41 A Correct. 41 Q Let's ty thin one. 41 Like the right camera, the right time? 42 Like the right camera, the right time? 43 A So what time is this? 44 A Correct. 45 Q So you see them getting on the elevator. 46 (by get on? 47 A It:1.80 48 Coolide, and the site of the s				,		
2 A A male. 3 Q Is that Ms. Heard? 4 A Yes, A male with a hat on looking down. 5 Q Now what are they doing? 12:599.48 6 A They're touching heads. 7 Q Is this someone you recognize? 8 A Not at this angle. 9 Q Let's back up and see if we can get him 10 again. Just missed him getting on. 11 Recognize? 12 He appears to be keeping his head down, 13 doesn't he? 14 A Correct. 15 Q Are the cameras visible in the elevator? 16 Q A when the cameras visible in the elevator? 17 Q S of you were getting on the elevator. 18 would you see a camera? 19 A Yes. 20 Q Where would you see the camera? 21 A In the right-hand corner. 22 Q In your experience watching the security 23 video, do people tend to keep their heads down when 24 they get on? 25 A No. 20 (10) Have you seen people trying to avoid the 2 security converse before? 3 A Yes. 4 Q Can you give us some examples of when you 5 have seen that? 6 A Just now. 7 Q So looking at that on the video that we 8 just asw wafer having seen as lot of Videos of 9 security footage from security cameras in this 10 building, what is your takenway when you see how 10 1:01:17 6 A Just now. 7 Q So looking at that on the video that we 8 just asw wafer having seen as lot of Videos of 9 security footage from security cameras in this 10 building, what is your takenway when you see how 10 1:01:17 6 A Just now. 7 Q So looking at that on the video that we 8 just asw wafer having seen as lot of Videos of 9 security footage from security cameras in this 10 building, what is your takenway when you see how 10 1:01:17 6 A Just now. 7 Q So looking at that on the video that we 8 just asw wafer wairs geen as lot of Videos of 9 security footage from security cameras in this 11 they entered the elevator? 12 A They were tyring to hide. 13 Q Let's go back to a couple of things. 14 We watched videos, a fair number of them in 15 which Ms. Heard is in and they were — and which her 16 sister was in the video Ms. Heard's sister fake 20 punching her. 15 Q punching her. 16 Q Did Amber's sister make contact with her 14 f	1	Q	Who is that?	1	C	O Do you recall what day it was?
4 A Yes. A male with a hat on looking down. 5 Q Now what are they doing? 12:59-48 6 A They're touching heads. 7 Q Is this someone you recognize? 8 A Not at this angle. 9 Q Let's back up and see if we can get him 10 again. Just missed him getting on. 11 Recognize? 12 He appears to be keeping his head down, 13 doesn't he? 14 A Correct. 15 Q Are the cameras visible in the elevator? 16 Q So if you were getting on the elevator? 17 A Italia. 18 would you see a camera? 18 Q Where would you see the camera? 19 A Yes. 20 Q Where would you see the camera? 21 Q In your experience watching the security 22 Q In your experience watching the security 23 video, do people tend to keep their heads down when 24 they get on? 25 A No. 20 101-01-05 21 Q If ave you seen people trying to avoid the 2 security cameras before? 21 Q Is ave seen that? 22 Q Is ave used people trying to avoid the 2 security cameras before? 23 A Yes. 4 Q Can you give us some examples of when you 5 have seen that? 6 A Jast now. 7 Video 36? 8 Let's try that one, which I've lost track 9 where you see a camera? 11 Desc that look right? 12 A This the right camera, the right time? 13 A No. It's too early. It was later. 14 Q Carset. 15 A This looks accurate. 16 Q So what time is this? 17 A Italia. 18 Q So you see them getting on the elevator 19 here; right? 20 Q Where would you see the camera? 21 Q Is you were people trying to avoid the 22 calain to this? 22 calain to this? 23 A Right before they entered the elevator. 24 Q Can you give us some examples of when you 5 have seen that? 6 A Jast now. 10 101:05 9 security footage from security cameras in his 10 building, what is your takeway when you see how 11 In they entered the elevator? 12 A They were trying to hide. 13 A This thore free (indicating), and then she started laughing? 15 A This look accurate. 16 Q So you were looking at security camera 27 Goolage from outside the elevator; is that right? 28 A A More was abenind her sister and her sister 29 Can you describe what you saw, who was 4 where? 5 A A A mere was a	2	Α	A male.	2		
5 Q Now what are they doing? 6 A They're touching heads. 7 Q Is this someone you recognize? 8 A Not at this angle. 9 Q Let's back up and see if we can get him 10 again. Just missed him getting on. 11 Recognize? 12 He appears to be keeping his head down, 13 doesn't he? 14 A Correct. 15 Q Are the cameras visible in the elevator? 16 Q Not were getting on the elevator? 17 Q So if you were getting on the elevator. 18 would you see a camera? 19 A Yes. 20 Q Where would you see the camera? 21 A In the right-hand corner. 22 Q In your experience watching the security 23 video, do people tend to keep their heads down when 24 they get or or you were looking at security camera in this 25 have seen that? 26 A No. 27 Q So looking at that on the video that we 28 just saw after having seen a lot of videos of 29 security footage from security eameras in this 10 building, what is your takenawy when you see how 11 Q Have you seen the right on the video that we 12 list saw after having seen a lot of videos of 29 security footage from security eameras in this 10 United and the video that we 11 they entered the elevator. 12 A They were trying to avoid the 2 security cameras before? 2 A No. 2 O So looking at that on the video that we 18 just saw after having seen a lot of videos of 29 security footage from security eameras in this 10 United and the were — and which her 11 C which Ms. Heard is in and they were — and which her 12 O A They all did. 11 Q Who was in the group? 12 A They were trying to hike. 13 A No. 16 (Q What else were they doing at that time, 17 Larly and Amber. 18 A No. 19 Larly and Amber. 19 A Yes. 10 Larly and Amber. 20 Q Who was in the group? 21 A They were trying to hike. 22 Larly out seed the elevator; is that right? 23 A Right before they were walking in from 24 C So you were looking at security camera 25 footage from outside the elevator; is that right? 26 A Just Now. 27 A Amber was behind her sister and her sister 28 Just Souther and Amber. 29 Q Who started laughing? 20 Larly and Amber sister make contact with h	3	Q	Is that Ms. Heard?	3	that	t clip.
6 A They're touching heads. 7 Q Is this someone you recognize? 8 A Not at this sample. 9 Q Let's back up and see if we can get him 10 again. Just missed him getting on. 11 again. Just missed him getting on. 12 Heappears to be keeping his head down, 13 doesn't he? 14 A Correct. 15 Q Are the cameras visible in the clevator? 16 Q So what time is this? 17 Q So if you were getting on the elevator, 18 would you see a camera? 19 A Yes. 20 Q Where would you see the camera? 21 A In the right-hand corner. 22 Q In your experience watching the security watcher yellow of the get on? 23 ideo, do people tend to keep their heads down when 24 they get on? 25 A No. 26 In Q Have you seen people trying to avoid the security cameras before? 27 Q So blooking at that on the video that we a just saw after having seen a lot of videss of 9 security footage from security cameras before? 28 A They were trying to hide. 39 Q Let's back up and see if we can get him 20 quite the seep head of when you 5 have seen that? 40 Can you give us some examples of when you 5 have seen that? 51 A This hooks accurate. 52 Q Where would you see the camera? 61:00.43 6 Q So you see them getting on the elevator. 61:00.43 7 Q So when did the fake punch occur in 22 relation to this? 7 Q So when did the fake punch occur in 22 relation to this? 7 Q So you were looking at security camera 25 footage from outside the elevator; sthat right? 7 Q So fooking at that on the video that we 8 just saw after having seen a lot of videss of 9 security footage from security camera before? 8 Just saw after having seen a lot of videss of 9 security footage from security camera having the security of the seen and the video that we 8 just saw after having seen a lot of videss of 9 security footage from security camera this 10 building, what is your takeaway when you see how 11:01:219 10 A They all did. 11 Q Who was in the group? 12 A Raquel, Whitney, and Amber. 13 Q Did Amber's sister make contact with her 14 face? 14 A Carrect. 15 Q Who was in the group? 16 Q Who sare the group? 17	4	Α	Yes. A male with a hat on looking down,	4	A	A It was on Tuesday at 11:00 o'clock, I
7 video 367 8 A Not at this angle. 9 Q Lefts back up and set five can get him 10 again. Just missed him getting on. 11 Recognize? 12 He appears to be keeping his head down, 13 doesn't he? 14 A Correct. 15 Q Are the cameras visible in the clevator? 16 A Yes. 17 Q So if you were getting on the elevator, 18 would you see a camera? 19 A Yes. 20 Q Where would you see the camena? 21 A In the right-hand corner. 22 Q In your experience watching the security 23 video, do people tend to keep their heads down when 24 they get on? 25 A No. 10 Q Have you seen people trying to avoid the 2 security cameras before? 3 A Yes. 4 Q Can you give us some examples of when you 5 have seen that? 10 Q So looking at that on the video that we 8 just saw after having seen a lot of videos of 9 security footage from security cameras in this 10 building, what is your takeaway when you see how 10 to 10:25 11 A left sign and the video that we 8 just saw after having seen a lot of videos of 9 security footage from security cameras in this 10 building, what is your takeaway when you see how 11 Q Have you seen here to loik at the sister was in. 12 Earlier when you first arrived and first 13 We watched videos, a fair number of them in 14 We watched videos, a fair number of them in 15 which M. Heard is in and they were — and which her 16 sister was in. 17 Earlier when you discribed a video 19 where you saw in the video Ms. Heard's sister fake 20 punching her. 21 Can you tell us more about that since it 22 leart one of the ones we have here to look at? 22 leart one of the ones we have here to look at? 23 Last to this first 24 Whitney. 25 Lefts try that one, which I've lost track 26 Lefts try that lone, which I've lost track 26 Lefts try that one, which I've lost track 26 Lefts try that lone, which I've lost track 26 Lefts try that lone, which in the gibt camera, the fight c	5	Q	Now what are they doing? 12:59:48	5	thin	nk. 01:02:37
8 A Not at this angle. 9 Q Let's back up and see if we can get him 10 again. Just missed him getting on. 11 Recognize? 12 He appears to be keeping his head down, 13 doesn't ke? 14 A Correct. 15 Q Are the cameras visible in the elevator? 16 A Yes. 17 Q So if you were getting on the elevator, 18 would you see a camera? 19 A Yes. 10 Q Where would you see the camera? 20 Q Where would you see the camera? 21 A In the right-hand corner. 22 Q In your experience watching the security 23 video, do people tend to keep their heads down when 24 they get on? 25 A No. 26 Q In your experience watching the security 27 video, do people tend to keep their heads down when 28 they get on? 29 A Yes. 20 Q Ware would you see manyles of when you see how 10:01:05 20 A Correct. 21 Q In your experience watching the security 22 video, do people tend to keep their heads down when 24 they get on? 25 A No. 26 Q In you caperhence watching the security 27 video, do people tend to keep their heads down when 28 they get on? 29 A Yes. 20 Q Ware would you see never pring to avoid the 29 security cameras before? 30 A Yes. 4 Q Can you give us some examples of when you 5 have seen that? 4 Q Can you give us some examples of when you 5 have seen that? 4 Q Can you give us some examples of when you 5 have seen that? 5 A Amber was behind her sister and her sister 6 Lumed around and like went like 6 United and his would have a where watched videos, a fair number of them in 10 Who was in the group? 11 Q Who was in the group? 12 A Telegue, Whitney and Amber. 13 Q Let's go back to a couple of things. 14 We watched videos, a fair number of them in 15 which Ms. Heard is in and they were — and which her 16 Q What else were they doing at that time, 17 Earlier when you described a video 19 where you saw in the video Ms. Heard's sister fake 20 punching her. 21 Can you tell us more about that since it 22 List to reflate one, the right time? 23 Like the right camera, the right ther? 24 Q Can you see them getting on the elevator. 25 A Nish tooks accurate. 26 So what ti	6	Α	They're touching heads.	6	ζ	Okay. Do you think it might have been
9 Q Let's back up and see if we can get him 10 again. Just missed thin getting on. 110 again. Just missed thin getting on. 110 again. Just missed thin getting on. 110 lis that 204 D, maybe? 111 Does that look right? 112 Like the right camera, the right time? 113 doesr't he? 114 A Correct. 115 Q Are the cameras visible in the elevator? 115 Q Are the cameras visible in the elevator? 116 A Yes. 117 Q So if you were getting on the elevator, 118 would you see a camera? 119 A Yes. 110 Q Where would you see the camera? 110 A Int her right-hand corner. 111 Q Where would you see the camera? 112 Q In your experience watching the security 113 doesr't he? 114 Q Let's try this one. 115 A This looks accurate, 116 Q So what time is this? 117 Q So look were getting on the elevator. 118 Q So you see them getting on the elevator. 119 A Ves. 120 Q Where would you see the camera? 121 Q In your experience watching the security 122 video, do people tend to keep their heads down when 123 A Right before they entered the elevator. 124 Q So you were looking at security camera 125 footage from outside the elevator; is that right? 126 A No. 137 Q Can you give us some examples of when you 140 Q Can you give us some examples of when you 150 A Mere? 150 A Area was after having scen a lot of videos of 150 security footage from security cameras in this 150 building, what is your takeraway when you see how 150 Let's go back to a couple of things. 151 A Int to her face (indicating), and then she started 152 Let's go back to a couple of things. 153 A Pos. 154 A This looks accurate, 165 Q So what time is this? 175 A 11:18. 186 Q So you see them getting on the elevator. 210 Q So when fidd the fake punch occur in 221 Q Jost When they were walking in from 222 Video, do people tend to keep their heads down when 223 A Right before they entered the elevator; is that right? 224 Q So you were looking at security camera 235 footage from outside the elevator; is that right? 236 A Area was after having seen a lot of videos of 24 Q So you were looking at secu	7	Q	Is this someone you recognize?	7	vide	eo 36?
10 Again. Just missed him getting on. 11 Recognize? 12 He appears to be keeping his head down, 13 doesn't he? 14 A Correct. 15 Q Are the cameras visible in the elevator? 16 A Yes. 17 Q So if you were getting on the elevator, 18 would you see a camera? 19 A Yes. 20 Q Where would you see the camera? 21 A In the right-hand corner. 22 Q In your experience watching the security 23 video, do people tend to keep their heads down when 24 they get on? 25 A No. 20 I Q Have you seen people trying to avoid the 2 security cameras before? 3 A Yes. 4 Q Can you give us some examples of when you 5 have seen that? 4 Q Can you give us some examples of when you 5 have seen that? 5 A They were trying to hide. 13 Q Let's go back to a couple of things. 4 We watched videos, a fair number of them in 15 which Ms. Heard is in and they were — and which her 16 sister was in. 17 Earlier when you first arrived and first 18 that 204 D, maybe? 19 Let's to this fight? 10 Like the right camera, the right time? 11 A No. 18 to oarly. It was later. 14 Q Let's try this ones. 15 A This looks accurate, 01:03:18 16 Q So what time is this? 17 A 11:18. 18 voould you see a teamera? 19 No 18 Yes. 20 Q Where would you see the camera? 21 Q So when did the fake punch occur in 22 relation to this? 23 A Right before they entered the elevator. 24 Q So you were looking at security camera 25 A No. 26 Total this? 27 Can you give us some examples of when you 28 have seen that? 29 Can you give us some examples of when you 3 have seen that? 3 Q Can you describe what you saw, who was 4 where? 20 A Correct. 21 A Correct. When they were walking in from 2 the mezzanine doors. 21 A Romber was behind her sister and her sister 22 A Romber was behind her sister and her sister 3 Q Con you describe what you saw, who was 4 where? 21 A Ropuel, Whitney and Amber. 22 A Ropuel, Whitney and Amber. 23 A Ropuel, Whitney and Amber. 24 A They were trying to hide. 25 A No. 26 Q When was in the group? 27 A Ropuel was were they doing at that time. 27 A Ropuel was were they doing at that tim	8	Α	Not at this angle.	8		Let's try that one, which I've lost track
11 Recognize? 12 He appears to be keeping his head down, 12 Like the right camera, the right time? 13 A No. It's too early. It was later. 14 A Correct. 14 Q Let's try this one. 15 Q Are the cameras visible in the elevator; 16 A Yes. 16 A Yes. 17 Q So if you were getting on the elevator, 18 Would you see a camera? 19 here; right? 19 A Yes. 19 here; right? 19 Here;	9	Q	Let's back up and see if we can get him	9	whe	ere my marking is.
12 He appears to be keeping his head down, 13 doesn't he? 14 A Correct. 15 Q Are the cameras visible in the clevator? 16 A Yes. 17 Q So if you were getting on the elevator, 18 would you see a camera? 19 A Yes. 20 Q Where would you see the camera? 21 A In the right-hand corner. 22 Q In your experience watching the security 23 video, do people tend to keep their heads down when 24 they get on? 25 A No. 26 Q Have you seen people trying to avoid the 2 security cameras before? 27 Q In your give us some examples of when you 25 have seen that? 26 Q A Just mow. 27 Q So looking at that on the video that we 28 just saw after having seen a lot of videos of 29 security footage from security cameras in this 30 Q Let's go back to a couple of things. 40 Who at the delevator? 41 Q Who was in the group? 41 Q Who was in the group? 42 A They were trying to hide. 43 Q Let's ty this one. 44 We watched videos, a fair number of them in 45 which Ms. Heard is in and they were — and which her 46 Just row, 47 Carrect. 48 Just row, 49 Can you describe do a video 49 Just White out a fair member of them in 40 Let's ty this one. 40 Correct. 41 Q Let's ty this one. 41 Cy Let's try this one. 41 It:18. 48 Qu between them getting on the elevator 41 Perect. 41 Cy Carrect. 41 Cy Car	10	again	. Just missed him getting on. 01:00:01	10		Is that 204 D, maybe? 01:02:49
13 doesn't he? 14 A Correct. 15 Q Are the cameras visible in the elevator? 16 A Yes. 17 Q So if you were getting on the elevator. 18 would you see a camera? 19 A Yes. 20 Q Where would you see the camera? 21 A In the right-hand corner. 22 Q In your experience watching the security 23 video, do people tend to keep their heads down when 24 they get on? 25 A No. 26 G Have you seen people trying to avoid the 27 escurity cameras before? 28 escurity cameras before? 29 So looking at that on the video that we 30 Just now. 4 Q Can you give us some examples of when you 5 have seen that? 5 Q So looking at that on the video that we 8 just saw after having seen a lot of videos of 9 security footage from security cameras in this 10 building, what is your takeaway when you see how 10 building, what is your takeaway when you see how 11 Q Let's go back to a couple of things. 14 We watched videos, a fair number of them in 15 which Ms. Heard is in and they were —and which her 16 sister was in. 16 G are really find that on the video that we 17 Farlier when you first arrived and first 18 started testifying today, you described a video 19 where you saw in the video Ms. Heard's sister fake 20 punching her. 21 Can you tell us more about that since it 22 Eint on to this? 23 A Right before they entered the elevator. 24 Q So you were looking at security camera 25 footage from outside the elevator; is that right? 26 A Correct. 27 Q So looking at that on the video that we 28 just saw after having seen a lot of videos of 9 security footage from security cameras in this 10 building, what is your takeaway when you see how 10:01:29 11 Q Who was in the group? 12 A Raquel, Whitney and Amber. 13 Q Did Amber sister make contact with her 14 face? 14 Gev 15 A No. 16 O What else were they doing at that time, 17 Can you tell us more about that since it 28 Lyst Whitney. 29 Q Just Whitney. 20 Did Whitney pretend to hit anyone or — 20 Did Whitney pretend to hit anyone or — 21 Can you tell us more about that since it 22 Land you tell us more about that sin	11		Recognize?	11		Does that look right?
14 A Correct. 15 Q Are the cameras visible in the elevator? 01:00:33 16 A Yes. 17 A 11:18. 18 Would you see a camera? 19 A Yes. 20 Q Where would you see the camera? 01:00:43 21 A Inthe right-hand corner. 22 Q In your experience watching the security 22 video, do people tend to keep their heads down when 24 they get on? 29 A Correct. 01:03:37 21 A In the right-hand corner. 21 Q So when did the fake punch occur in 22 relation to this? 21 Q So you were looking at security camera 25 footage from outside the elevator; is that right? 01:03:53 Page 72 21 Q Have you seen people trying to avoid the 2 security cameras before? 20 A Correct. When they were walking in from 2 the mezzanine doors. 3 Q Can you describe what you saw, who was 4 where? 3 A Must now. 7 Q So looking at that on the video that we 8 just saw after having seen a lot of videos of 9 security Goange from security cameras in this 10 building, what is your takeaway when you see how 01:01:29 21 A They were trying to hide. 11 Q Who was in the group? 12 A They were trying to hide. 12 A Raquel, Whitney and Amber. 13 Q Did Amber's sister make contact with her 14 face findicating), and then she started 18 started testifying today, you described a video 19 where you saw in the video Ms. Heard's sister fake 20 punching her. 01:02:10 20 A Correct. When they were walking in from 2 the mezzanine doors. 3 Q Can you describe what you saw, who was 4 where? 4 them are the face findicating), and then she started 18 laughing. 10 Q Who started laughing? 10 Q Who was in the group? 12 A Raquel, Whitney and Amber. 13 Q Did Amber's sister make contact with her 14 face? 14 Care you stay in the video Ms. Heard's sister fake 20 punching her. 01:02:10 20 Q Just Whitney. 01:04:04 2	12		He appears to be keeping his head down,	12		Like the right camera, the right time?
15 Q Are the cameras visible in the elevator? 01:00:33 16 A Yes. 16 Q So what time is this? 17 Q So if you were getting on the elevator, 18 would you see a camera? 18 would you see a camera? 18 would you see a camera? 19 A Yes. 19 here; right? 20 Q Where would you see the camera? 01:00:43 21 A In the right-hand corner. 21 Q So when did the fake punch occur in 22 Q In your experience watching the security 22 video, do people tend to keep their heads down when 24 they get on? 25 A No. 01:01:05 25 A No. 01:01:05 26 Page 70 27 Page 70 28 Have you seen people trying to avoid the 2 security cameras before? 26 A Just now. 7 Q So looking at that on the video that we 8 just saw after having seem a lot of videos of 9 security footage from security cameras in this 10 building, what is your takeaway when you see how 11 they entered the elevator? 12 A Requel, Whitney and Amber. 13 Q Lefts go back to a couple of things. 14 We watched videos, a fair number of them in 15 which Ms. Heard is in and they were — and which her 16 sister was in. 17 Earlier when you first arrived and first 18 started testifying today, you described a video 19 where you saw in the video Ms. Heard's sister fake 19 Q Did Amber pretend to hit anyone or — 20 A Just Whitney. 01:04:44 21 Can you tell us more about that since it 21 Q Just Whitney. 01:04:44 22 isn't one of the ones we have here to look at? 22 Did Whitney pretend to hit anyone or — 20 in Whitney pretend to hit anyone or — 20 in Whitney, 01:04:44	13	doesn	't he?	13	Α	No. It's too early. It was later.
16 A Yes. 17 Q So if you were getting on the elevator, 18 would you see a camera? 19 A Yes. 20 Q Where would you see the camera? 21 A In the right-hand corner. 22 Q In your experience watching the security 23 video, do people tend to keep their heads down when 24 they get on? 25 A No. 26 O 1:01:05 27 Page 70 1 Q Have you seen people trying to avoid the 2 security cameras before? 3 A Yes. 4 Q Can you give us some examples of when you 5 have seen that? 6 A Just now. 7 Q So looking at that on the video that we 8 just saw after having seen a lot of videos of 9 security footage from security cameras in this 10 building, what is your takeaway when you see how 11 they entered the elevator? 12 A They were trying to hide. 13 Q Lef's go back to a couple of things. 14 We watched videos, a fair number of them in 15 which Ms. Heard is in and they were — and which her 16 sister was in. 17 Earlier when you first arrived and first 18 started testifying today, you described a video 19 punching her. 20 Go When did the fake punch occur in 21 Ca N Correct. 21 Ca Now tell us more about that since it 22 in can you tell us more about that since it 23 A Right before they entered the elevator. 24 Q So you were looking at security camera 25 footage from outside the elevator; 24 the mezzanine doors. 3 Q Can you describe what you saw, who was 4 where? 25 A A member was behind her sister and her sister 26 turned around — turned around and like went like 27 that to her face (indicating), and then she started 38 laughing. 4 Q Who started laughing? 4 Q Did Amber's sister make contact with her 4 face? 5 A Roquel, Whitney and Amber. 5 A Roquel, Whitney and Amber. 6 Q Who was in the group? 10 A They all did. 11 Q Who was in the group? 12 A Roquel, Whitney and Amber. 13 Q Lift amber's sister make contact with her 14 face? 15 A Roquel, Whitney and Amber. 16 Q What else were they doing at that time, 17 other than pretending to hit each other? 18 A They were laughing and 19 Q Did Amber pretend to hit anyone or — 20 A Just Whitney. 21 Old Whitne	14	Α	Correct.	14	Ç	Let's try this one.
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20 Q Where would you see the camera? 21 A In the right-hand corner. 22 Q In your experience watching the security 23 video, do people tend to keep their heads down when 24 they get on? 25 A No. 21 Q Have you seen people trying to avoid the 2 security cameras before? 3 A Yes. 4 Q Can you give us some examples of when you 5 have seen that? 6 A Just now. 7 Q So looking at that on the video that we 8 just saw after having seen a lot of videos of 9 security foutage from security cameras in this 10 building, what is your takeaway when you see how 11 they entered the clevator; is that right? 20 A Correct. Uhen they were walking in from 2 the mezzanine doors. 3 Q Can you describe what you saw, who was 4 where? 5 A Amber was behind her sister and her sister 6 turned around — turned around and like went like 7 that to her face (indicating), and then she started 8 laughing. 9 Q Who started laughing? 10 A They all did. 11 Q Who was in the group? 12 A Raquel, Whitney and Amber. 13 Q Let's go back to a couple of things. 14 We watched videos, a fair number of them in 15 which Ms. Heard is in and they were — and which her 16 sister was in. 17 Earlier when you first arrived and first 18 started testifying today, you described a video 9 unching her. 10 1:03:53 Page 72 20 A Correct. 21 Q So when did the fake punch occur in 22 relation to this? 23 A Right before they entered the clevator. 24 Q So you were looking at security camera 25 footage from outside the elevator; is that right? 01:03:53 Page 72 1 A Correct. 20 So you were looking at security camera 25 footage from outside the elevator; is that right? 01:03:53 Page 72 1 A Correct. Q So you were looking at security camera 25 footage from outside the elevator; is that right? 01:04:03:05 A A The mezzanine doors. 3 Q Can you describe what you saw, who was 4 where? 5 A Amber was behind her sister and her sister 6 turned around — turned around and like went like 7 that to her face (indicating), and then she started 8 laughing. 9 Q Who started laughing? 11 Q Who was in the group?	18	would		18	Q	So you see them getting on the elevator
21 A In the right-hand corner. 22 Q In your experience watching the security 23 video, do people tend to keep their heads down when 24 they get on? 25 A No. 01:01:05 Page 70 1 Q Have you seen people trying to avoid the 2 security cameras before? 3 A Yes. 4 Q Can you give us some examples of when you 5 have seen that? 01:01:17 6 A Just now. 7 Q So looking at that on the video that we 8 just saw after having seen a lot of videos of 9 security footage from security cameras in this 10 building, what is your takeaway when you see how 11 they entered the elevator? 12 A A Right before they entered the elevator. 24 Q So you were looking at security camera 25 footage from outside the elevator; is that right? 01:03:53 Page 72 1 A Correct. When they were walking in from 2 the mezzanine doors. 3 Q Can you describe what you saw, who was 4 where? 5 A Amber was behind her sister and her sister 6 turned around – turned around and like went like 7 that to her face (indicating), and then she started 8 laughing. 9 Q Who started laughing? 10 A They all did. 01:04:18 11 Q Who was in the group? 12 A Raquel, Whitney and Amber. 13 Q Did Amber's sister make contact with her 14 face? 15 A No. 01:04:30 16 Sister was in. 17 Earlier when you first arrived and first 18 started testifying today, you described a video 19 where you saw in the video Ms. Heard's sister fake 20 punching her. 01:02:10 21 Can you tell us more about that since it 22 Did Whitney. 01:04:44 21 Can you tell us more about that since it 22 Did Whitney. 01:04:44 22 Did Whitney pretend to hit Raquel?	19	Α	Yes.	19	here	e; right?
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24 they were coming back when Raquel had a bottle of 24 Q Just her sister Amber.	i		•	1		
25 wine in her hand. 01:02:25 25 Where did she pretend to hit her? 01:04:52	1	_	-	l	•	
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1 A Like at her face.	ļ	1	Mr. D	epp make you show the video of Whitney H	eard
2 Q Any particular part of her face?	Í	2	fake p	unching Amber Heard to the general manage	er of
3 A Her head.	1	3	the bu	ilding Brandon Patterson?	
4 Q The top of her head? The bottom of her		4	Α	Because I was thought it was wrong.	
5 head? Can you be more specific? 0	1:05:06	5	Q	What did you think was wrong?	01:07:35
6 A It was like in front of her face.		6	Α	That there was such a serious matter going	
7 Q In front of her face. I see.		7	on an	I they were acting like that.	
8 Other than the fake punch and the laughing,		8	Q	When you say "serious matter," what are yo	u
9 do you recall anything else about the video?		9	talkin	g about?	
10 A No. 01:05:16	1	0	Α	Everything that was in the press.	01:07:51
11 Q Is this the video that you said you	1	1	Q	Can you tell us more about what you	
12 identified when you were trying to be helpful but	1	2	remen	ber being in the press at that time?	
13 didn't realize that you were not supposed to be?	1	3	Α	That Amber's filing a domestic violence	
14 A Yes.	1	4	restrai	ning order against Mr. Depp and later filing	
15 Q In the video where Whitney Heard was		5	for di	vorce. 01:08:05	
16 pretending to hit Amber Heard, how did Amber's fac			_	Uh-huh. And so what about the video of	
17 look at that point?	1			ey Heard pretending to punch Amber Heard,	what
18 A Normal.				u think was wrong about that?	
19 Q She didn't have any marks on her face at	1	9	Α	Well, I had known that Mr. Depp had left	
20 that time? 01:05:46	2	0	the co	untry on Saturday and did not return.	01:08:22
21 A No.	2	1	Q	Saturday, May 21st, 2016?	
22 Q This was before the marks appeared on her	2	2	A	Соггест.	
23 face?	2		-	Yes. I did not mean to interrupt you.	
24 A Yes.	2	4	Keep	on with your answer.	
25 Q The security cameras in the building, are	01:05:59 2 Page 74	5	A	And he did not return and so I was	01:08:33 Page 76
1 they all at the angle not the angle, the distance		•	querti	oning how those marks got on her face on	
2 that we've been looking at today, or do you have the	l l		Friday		
3 ability to zoom in or zoom out?		3	•	I see.	
4 A You can zoom in and zoom out.		4	-	Because you hadn't seen them earlier in the	
5 Q On the video that you described of Whitney			week?	-	
6 Heard pretending to punch Amber Heard on the face		6		Yes.	
7 did you ever zoom in on that or zoom out or change		7		Okay. So tell us about what you remember	
8 the perspective?				ning next after the marks appeared on	
9 A Yes.				eard's face on Friday, May 27th, 2016.	
10 Q Tell us about that, please. 01:06				Someone had told the press that the front	01:08:59
11 A I showed the general manager the video.	-			ad talked to someone and reported that none	
12 Q Who was the general manager?				any marks on her face, and so I was concern	
13 A Brandon Patterson.	1			that would mean that obviously all my	
14 Q When did you show him the video?	1			yees have to sign a confidentiality agreement	!
15 A The following week, 01:00				as concerned, not only for my company, but	
16 Q The last week of May 2016?				y that other residents would feel if they knew	
17 A Correct.	1			at was the truth.	•
18 Q Why did you show the video to Brandon	1:			I want to back up.	
19 Patterson?	11			First of all, was it true or untrue that	
				f the people who worked at the front desk ha	ıd 01:09:42
21 Q What about the when you say "the	L L			n me people who worked at the front desk has ny marks on Ms. Heard's face?	.u. U1.U7.42
22 allegations," you mean the abuse allegations against	2:			It is true.	
23 Mr. Depp?	2		0	So that part of it you didn't have an issue	
24 A Yes.			•	ecause it was true?	
25 Q Why did the abuse allegations against	01:07:19			Right. 01:09:52	
	Page 75	-	••		Page 77

1 Q So what concerned you about someone saying	1 Q Did you talk to anyone else about it?
2 publically that the front desk had reported not	2 A King.
3 seeing any marks on her?	3 Q Who is King?
4 A It just it was just concerning because I	4 A He was at the time my overnight security
5 didn't we didn't want to get involved. 01:10:13	5 guard. 01:12:15
6 Q When you say "we," who do you mean?	6 Q Had he seen her?
7 A I didn't want to get involved.	7 A No.
8 Q I see.	8 Q Did you talk with anyone else?
9 So do you know who told back up.	9 A No.
10 A I have an idea. 01:10:30	10 Q But between you and Cornelius Harrell and 01:12:23
Il Q So was it publically reported in the media	11 Alex Romero and Brandon Patterson, all of you had
12 that the front desk said they didn't see marks on	12 seen her at some point; is that right?
13 Amber's face?	13 A Yes.
14 A Correct.	14 Q And none of you had seen the marks?
15 Q Do you remember what media outlets reported 01:10:42	15 A Brandon saw her after the marks were there. 01:12:37
16 that?	16 Q Among the people who saw her earlier in the
17 A TMZ, I think.	17 week, between May 21st and May 22nd - May 26th I
18 Q So that concerned you.	18 mean, that was you, Alex and Cornelius; right?
19 What did you do when this reporting took	19 A Yes.
20 place? 01:10:54	20 Q None of you saw the marks? 01:12:56
21 A Nothing.	21 A Correct.
22 Q Did you talk to any of your employees about	22 Q So tell me more about this conversation
23 it?	23 that all of you were having after someone had told
24 A Yes.	24 the media that you hadn't seen the marks.
25 Q Who did you talk to? 01:11:04 Page 78	25 A It was out there. We just kind of dropped 01:13:18 Page 80
1 A I was trying to figure out we all had an	I it.
2 idea that it was a woman that lived in the building	2 Q Okay. Did you ever have any conversations
3 because she wanted to she was an attorney and so	3 with Ms. Heard about the marks?
4 she like spoke on TV and she's like, this is the	4 A The "remarks"?
5 building that I live in, and so we just discussed 01:11:22	5 Q About the marks on her face? 01:13:30
6 that she was probably the one that threw us under	6 A Just once on Friday I asked if she was
7 the bus for publicity.	7 okay.
8 Q When you say "we," who are you talking	8 Q What about after it was publicly reported
9 about?	9 that the front desk said they didn't see the marks,
10 A Alex. I was speaking with Alex. 01:11:33	10 did you have any conversations with Ms. Heard after 01:13:45
11 Q Who was the woman?	11 that?
12 A She's an attorney that lives in the	12 A Yes.
13 building.	13 Q Can you tell us about those conversations?
14 Q Had you or Alex	14 A I saw her coming down the elevator she
15 A But we're not sure about it, so 01:11:43	15 had called me and she needed to talk to me and 01:13:54
16 Q Sure.	16 Brandon and asked if it was a good time, so I went
17 Had you or Alex talked with this woman?	17 into Brandon's office and I told him that she's
18 A No.	18 coming down.
19 Q Had you talked to anyone about not having	19 Q When you say she called you, did she call
20 seen marks on Ms. Heard's face? 01:11:52	20 you at the front desk landline? 01:14:08
21 A Only amongst each other.	21 A Yes.
22 Q "Amongst each other" meaning?	22 Q Where is Brandon's office located in
23 A Brandon, Alex, Gaylynn, Cornelius.	23 relation to the front desk?
24 Q Anyone else?	24 A It's in the hallway behind us.
25 A Gaylynn didn't see her, though. 01:12:04	25 Q What day was this? 01:14:18
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1 A It was the following week and I feet like	1 A And then I walked into Brandon's office and
2 it was Friday.	2 I told her that she has to make a statement, and so
3 Q Okay.	3 I stayed there so he could kind of guide me.
4 A I'm not certain. It was at the end of the	4 Q And how did that conversation play out
5 next week. 01:14:39	5 after she asked you to make a statement retracting? 01:16:56
6 Q So tell us about your conversation with	6 A She just said, I have a friend at People
7 Ms. Heard and Brandon in Brandon's office.	7 magazine. Can you talk to them?
8 A She asked us if the building - if we could	8 And I said that I couldn't. And I said
9 talk to People magazine, one of her friends who	9 that she can come down and talk to me and Brandon
	56 10 about it. 01:17:14
11 the building saying that we would not release any	11 Q Was it your understanding that People
12 confidential information to the press.	12 magazine was running a story about her?
13 Q Okay.	13 A No.
14 A That we would we have never.	14 Q What was your understanding?
15 Q So she wanted you I just want to make 01:15:16	15 A That she wanted us to make a statement on 01:17:24
16 sure I'm following this.	16 behalf of the building.
17 She wanted you to talk to the press about	17 Q What was Brandon's response?
18 how you wouldn't talk to the press; is that right?	18 A No. You can talk to our lawyer.
19 A She wanted us to help retract the statement	19 Q Did you have any additional conversations
20 that was given to the press stating that the front 01:15:30	20 with Ms. Heard about this proposed statement at any 01:17:41
21 desk had released this information and she asked if	21 other time?
22 we would clarify it and let them know that we, in	22 A No.
23 fact, would never release that information on any	23 Q Did you end up making a statement to People
24 resident.	24 magazine?
25 Q Okay. How did you take that? 01:15:44	25 A No. 01:17:51
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1 A We told her that she we told her that	1 Q Did the building end up making a statement
2 she can talk to our attorney.	2 to People magazine?
3 Q What did you think she was what did you	3 A No.
4 think her goals were based on the conversation?	4 Q Did you want to make a statement to People
5 A To retract the statement that the front 01:16:00	5 magazine? 01:17:59
6 desk had seen her without any marks.	6 A No.
7 Q Did she ever talk to you about the	7 Q Why not?
8 substance of the statement, that you had, in fact,	8 Let's try it this way: The statement that
9 seen her without any marks?	9 Ms. Heard was proposing that you make, that the
10 A No. 01:16:17	10 building would not have said they saw her without 01:18:17
11 Q So did she address that at all?	11 marks on her face, were you comfortable making a
12 A No.	12 statement like that?
13 Q Tell me more about the friend at People	13 A No.
14 magazine.	14 Q Putting aside whether you could or not, why
15 Was there anything else she said about this 01:16:28	15 were you not comfortable making such a statement? 01:18:2
16 person?	16 A Because that would have been a lie.
17 A No.	17 Q What about it would have been a lie?
18 Q Did she tell you when she wanted you to	18 A The front desk did, in fact, see her prior
19 talk to this friend at People magazine?	19 to Friday without marks on her face.
20 A She asked me if I would make a statement 01:16:37	20 Q Based on your interactions with Ms. Heard, 01:18:45
21 over the phone	21 was it unusual for her to make a request like that
-	22 of you or Brandon to make some sort of a statement
22 U Okav.	. ,
22 Q Okay. 23 A originally, and I told her that she can	23 on her behalf?
22 Q Okay. 23 A originally, and I told her that she can 24 talk to Brandon.	23 on her behalf? 24 A Yes.
23 A originally, and I told her that she can	

1 before?	1 What other unusual interactions did you
2 A No.	2 have with Ms. Heard?
3 Q After you and Brandon directed her to the	3 A I had a couple interactions with her when
4 building's lawyers, was there any follow up from her	4 she seemed like she was under the influence a little
5 on the statement? 01:19:14	5 bit. 01:21:33
6 A No.	6 Q When was that?
7 Q Did you ever have any further conversations	7 A I know there was one time that was around
8 with Ms. Heard about the statement?	8 Thanksgiving.
9 A No.	9 Q Okay. Can you tell us how that interaction
10 Q What about the marks on her face? 01:19:21	10 went? 01:21:45
11 A No.	11 A She just seemed very out of it and looked
12 Q What about her abuse allegations against	12 very out of it and kind of upset and she was just
13 Mr. Depp?	13 kind of a mess.
14 A No.	14 Q What led you to conclude that she was kind
15 Q What about her divorce from Mr. Depp? 01:19:27	15 of a mess? 01:22:09
16 A No.	16 A She was dropping things and swaying back
17 Q Is there how long after May 2016 did	17 and forth.
18 Ms. Heard continue to live in the Eastern Columbia	18 Q Was she alone?
19 building?	19 A Yes.
20 A I believe it was over a year. 01:19:43	20 Q And how did you come to interact with her? 01:22:15
21 Q What about Mr. Depp, did he continue living	21 A She came downstairs and she needed me to
22 in the building?	22 fob her to the mezzanine, and I remember being
23 A No.	23 worried that she was going to drive in that state.
24 Q In the time that Ms. Heard continued living	24 Q And this was around Thanksgiving of 2016?
25 in the building, did you have any additional 01:19:55 Page 86	25 A Correct. 01:22:32 Page 88
1 interactions with her?	1 Q Was Mr. Depp still living in the building
2 A Yes.	2 at that point?
3 Q Was there anything unusual about those	3 A No.
4 interactions?	4 Q What other unusual interactions did you
5 A Such as? 01:20:03	5 have with Ms. Heard, if any? 01:22:43
6 Q Did anything stand out in your mind about	6 A I can't recall.
7 other interactions that you had with her?	7 Q Going back to the bruises that you describe
8 A Yes.	8 seeing on Ms. Heard.
9 Q Can you tell us what stood out in your mind	9 I think you said it was approximately two
10 about other interactions? 01:20:20	10 weeks after she – the May 21st incident when she 01:23:06
11 A One time she dropped her keys down the	11 made the allegations against Mr. Depp; is that
12 elevator shoot and she had bruises on her neck and a	12 right?
13 Band-Aid.	13 A Yes.
14 Q When was that?	14 Q What did those bruises look like?
15 A Couple weeks after. 01:20:33	15 A Hand marks. 01:23:15
16 Q After what?	16 Q And where were they?
17 A May 21st.	17 A On her neck.
18 Q Was Mr. Depp in the building at that point?	18 Q Was Mr. Depp in the building at that point
19 A No.	19 in time?
20 Q Was he in the country at that point? 01:20:4	1 20 A No. 01:23:24
21 A No.	21 Q To your knowledge, where was Mr. Depp?
22 Q Did you ask Ms. Heard how she got those	22 A Out of the country.
23 bruises?	23 Q Was there anyone else that she had been
24 A No.	24 interacting with during that period of time?
25 Q Did you strike that. 01:20:50	25 A Yes. 01:23:35
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1 Q Who had she been interacting with?	1 conversations with Ms. Heard in that week?
2 A Elon Musk.	2 A She asked she called me a couple times
3 Q Anyone else, to your knowledge?	3 and asked me to come outside because paparazzi was
4 A No.	4 out there, just her picking up things from me and
5 Q When you say they were hand marks, how big 01:23:41	5 dropping things off for other people. 01:38:44
6 were the bruises?	6 Q Do you recall any other specific
7 A They were like fingers.	7 conversations that you had with her on Monday, May
8 Q On her neck?	8 23rd, 2016?
9 A Yes.	9 A I know she mentioned something to me about
10 Q Which side of her neck? 01:23:52	10 her going to court. I can't recall correctly. 01:39:06
11 A I can't recall.	11 Q Was that when you talked to her on Friday,
12 Q How big were they?	12 May 27th, when she had the marks on her face and
13 A Like a quarter little less than	13 told you she was getting a divorce, or was that some
14 quarters.	14 other time?
15 Q How many were there? 01:24:12	15 A I don't recall when that was exactly. I 01:39:27
16 A Two.	16 think she had said that a car was coming to get her.
17 And then she had a mark, I think, on the	17 She had called and said a car was coming, to let
18 other side of her cheek.	18 them into the garage. She was worried about
19 Q "The other side of her cheek," which side	19 paparazzi.
20 do you mean? 01:24:22	20 Q Are there any other conversations you 01:39:54
21 A The left.	21 remember having with Ms. Heard that week?
22 Q So the opposite side of where the mark had	22 A Just the normal conversations.
23 been before?	23 Q Let me back up and ask it this way: We
24 A Uh-huh.	24 know you saw her in person on Wednesday the 25th,
25 Q This was again, was Mr. Depp in the 01:24:29 Page 90	25 because we saw the video of that with the key. 01:40:14 Page 92
1 country?	1 A On Monday and Tuesday.
2 A No.	2 Q Then we saw a Tuesday video of her picking
3 Q Other than those bruises, have you did	3 up a package from you; is that right?
4 you ever see Ms. Heard with any other visible	4 A Yes.
5 injuries to her body when she was living in the 01:24:42	5 Q Are there any other in-person conversations 01:40:24
6 Eastern Columbia building?	6 that you remember having with Ms. Heard that week?
7 A No.	7 A I don't remember exactly the context of the
8 MS. BILES: Let's take a quick break.	8 conversations. I know I saw her Monday, Tuesday,
9 THE VIDEOGRAPHER: This marks the end of	9 Wednesday and Friday, and I talked to her on the
10 media number 1. Going off the record at 1:24 p.m. 01:24:53	10 phone on Thursday. 01:40:54
11 (Whereupon, a recess was held	11 Q Going back to the time that you saw her
12 from 1:24 p.m. to 1:37 p.m.)	12 around Thanksgiving of 2016, when she appeared to be
13 THE VIDEOGRAPHER: This marks the beginning	13 under the influence, you said that Ms. Heard was
14 of media number 2. Going back on the record at	14 alone when you saw her or interacted with her
15 1:37 p.m. 01:37:59	15 about the mezzanine. 01:41:20
16 BY MS. BILES:	16 To your knowledge, did she have any guests
17 Q Ms. Esparza, earlier today you were talking	17 at her penthouse at that time or were any residents
18 about the interactions that you had with Ms. Heard	18 in the building visiting with her at that time?
19 in the week after May 21st, and I wanted to go back	19 A Yes.
20 to a couple of those. 01:38:12	20 Q What do you know about that? 01:41:31
21 You testified about the key interaction	21 A She had Cara Delevingne and Elon Musk there
22 which we saw in the video where she asked you to	22 the night of on Thanksgiving.
23 give a key to the housekeeper; is that right?	93 O 0590149
	23 Q Of 2016?
24 A Yes.	23 Q Of 2016? 24 A It was well, I guess it was the day
24 A Yes. 25 Q What other times did you actually have 01:38:22 Page 91	•

		Page 95			Page 9
25	Α	No. 01:44:31	25	A	No. 01:48:08
24		Is there anything else about that incident?	24		I'm trying to understand.
23	enter	taining job.	23	you	didn't feel they used?
22	Q	Okay. It sounds like you have an	22	gave	to Mr. Depp's lawyers in the divorce case that
	_	ed it out. I don't know.	21	Q	Was there information that you had that you
		ack up, so they took the stairs, and then they 01:44:05	ł	_	e involved. 01:47:50
		again and then they couldn't figure out how to)	-	ement that our depositions weren't really going
18	Α	They were like pressing the button over and	j		decided that they were going to make an
17	114111	I'm trying to visualize this.	!		the case, so I it just it seemed like
	_	g up and down?	16		Or I didn't understand what was going on
	doing	anything on the elevator or were they just 01:43:51	15	•	Why do you think that? 01:47:22
13 14	Ų	Going back to the elevator. Were Ms. Delevingne, Mr. Musk and Ms. Heard	13	A Q	
		ed like she had been drinking.	12		• •
11		I just saw her a couple times where it	11	_	No.
10	Q	Can you tell us about those times? 01:43:28		knev	
9	A	Yes.	1	-	tions that aim to get all the information you
	it?		8	-	
7	Ms. I	Heard when she appeared to be a little out of	7	abili	
6	Q	Were there other times when you saw	6	Α	I answered the questions as best to my
5	out o	fit. 01:43:12	5	Q	
4	A		4	•	I thought the questions were vague.
3	Q	What prompted you to look at that later?	1		were doing?
2	•	I looked at it later.	2		What was your impression of the work that
1	goins	z back and looking at this later?	1	me a	nd several other people at the front desk.
	V	Page 94	23	A	Page 90
25	0		25		Fy in a deposition? Laura Wasser and her partner had subpoenaed 01:46:21
23	Q A	Many times through the course of the night.	1	tectif	In July of 2016, how did you come to
22	_	cr were going up and down. What time of day was that?	22 23	Q	, , ,
21		Car was going up and down and then Elon and	21	_	Correct.
		ttor over and over again"? 01:42:39	20	Q	•
19		What do you mean "going up and down the	19	_	2016.
18	A		18	Q	•
17	-	Was Ms. Heard with them?	17		It was in July.
		and over again.	16	Α	Calendars do go back.
15		I saw them going up and down the elevator 01:42:24	15	Q	Sure. 01:45:17
14	Q	Can you tell us what you saw?	14	Α	Can I look in my phone and maybe
13	Α	Yes.	13		ion to your actual observations of her?
12	see ti	nem on the security cameras?	12		Do you recall when that deposition was in
11	`	What about on the security cameras, did you	11		At a previous deposition.
10		You said "not in person." 01:42:12	1		he week of May 21st, 2016? 01:45:01
9		Not in person.	1	Q	In relation to May 2016, when did you fy before about Ms. Heard and observations of
	same		7	_	I don't know the dates anymore. It was
7	Q		6	•	•
6		offuence? 01:41:58 Yes.	5	A	***************************************
		erned about her because she appeared to be under	4	Q	, , ,
3		And that's when you said that you were	3	A	Yes.
2		I saw her in the morning.	2		You previously testified, correct
	_	What time of day was it when you saw her?	1	Q	Going back to clarify one other thing.

1 Q Do you think there was information that you	1 EXAMINATION
2 had that they didn't obtain?	2 BY MR. WRENSHALL:
3 A Yes.	3 Q Good afternoon, Ms. Esparza.
4 Q Can you explain that?	4 I'm just going to ask you a couple
5 A Just the elevator thing. 01:48:17	5 questions. 02:03:10
6 Q "Elevator thing"	6 So did you meet with anyone prior to
7 A I mean, the fake punch thing.	7 appearing for your deposition today?
8 Q Meaning what you testified to about Whitney	8 A No.
9 Heard?	9 Q Did you discuss it with anyone?
10 A But they didn't ask me anything and it 01:48:30	10 A No. 02:03:20
11 wasn't my legal responsibility to give information	11 Q So what was the date of the night the
12 that wasn't asked of me.	12 police were called to the building?
13 Q I think I'm confused, because I thought you	13 A May 21st, 2016.
14 testified earlier today that when they the	14 Q I think you previously testified Mr. Depp
15 lawyers for Mr. Depp in the divorce first came and 01:48:46	15 left the country 02:03:29
16 started collecting videos that you told them to look	16 A Yes.
17 at	17 Q on May 21st.
18 A I mumbled a couple times and I told them	18 A That's what I was told, yes.
19 what cameras, but I don't think they heard me	19 Q Do you know why the police were called to
20 correctly. 01:49:00	20 the building? 02:03:34
2I Q Okay. I see.	21 A I believe someone called the police on
22 And so	22 behalf of a noise complaint.
23 A So I don't think it's their fault.	23 Q Did you discuss it with any of the building
24 Q I understand.	24 employees or any of your employees?
25 So why did you think that particular 01:49:08	25 A Not particularly, no. 02:03:49
Page 98	Page 100
1 footage was so important of Whitney Heard pretending	I Q But you knew the police had come to the
2 to hit Amber Heard?	2 building?
3 A Because of the allegations that were going	3 A Yes.
4 on about their argument on the 21st.	4 Q How did you know that Mr. Depp had left the
5 Q Can you explain that a little bit more so I 01:49:36	5 country? 02:03:56
6 make sure I understand.	6 A I text Kevin. I had said Kevin was one
7 A She didn't have a mark on her face on	7 of his I talked to Kevin and Andy frequently.
8 Monday, Tuesday, Wednesday, and she did on Friday.	8 They work for Mr. Depp. And I had text them that
9 On Tuesday night they were messing around, so it was	9 there was the police were called.
10 just peculiar. 01:49:58	10 Kevin said, all good, and then they said 02:04:14
11 MS. BILES: I think we're finished. I	11 that he left.
12 don't think I have any further questions right now.	12 Q What are Kevin and Andy's last names?
13 Thank you very much.	13 A Kevin I forget, And Andy is Milner.
14 THE WITNESS: Thank you.	14 Q You testified that Alex Romero
15 MR. WRENSHALL: I would like to ask a 01:50:08	15 Is that his last name? 02:04:40
16 couple questions, if you give me a brief break to	16 A Yes.
17 collect my thoughts.	17 Q had said that Amber and some of her
18 MS. BILES: Of course.	18 friends were scared on May 25th at the apartment?
19 THE VIDEOGRAPHER: Going off the record at	19 A Don't quote me on the date, but it was
20 1:50 p.m. 01:50:19	20 either Monday, Tuesday or Wednesday they said that 02:04:5
21 (Whereupon, a recess was held	21 they were scared to go into the apartment they
22 from 1:50 p.m. to 2:03 p.m.)	22 were scared someone was in there and asked him to
23 THE VIDEOGRAPHER: Going back on the record	23 come look and verify that no one was in there.
24 at 2:03 p.m.	24 Q Did they tell Mr. Romero why they were
25 /// 02:03:05	25 scared? 02:05:04
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1 A No. 2 Q When did you meet with Mr. Depp's atterneys 3 after the incident? 4 A The following week. 5 Q Do you creamber the date? 6 A I don't remember. 7 Q So the week following as in — 8 A When they came to the property to subposens 9 the floorage. This not sure what did to that is. 9 the floorage. This not sure what did to that is. 10 Q So the incident allogedly happened on the 02:05:29 11 21st; is that right? 12 A Correct. 13 Q If you meet work following the 21st? 14 A I believe it was the week after. 15 Q So the week following the 21st? 16 A I believe it was the week after. 17 Q Do you recall what day of the week it was 18 when they came? 19 A Possibly – I'm not certain, so I don't 20 want to – I'm not exactly aure what day it was. 22 Wasser coming to the building? 23 A I believe that was Laura Wasser and an 24 associate. 24 Q You that sturglided they are registered the was 24 they had another person working with them, so I'm 25 A O'r Blair. 26 Q You such think — I know someone that was 16 Q You currectly didn't been the Standard I know 2 they had another person working with them, so I'm 3 not exactly sure when can be the huilding, 4 Q I was a clither Jaura Wasser or Burke? 5 A O'r Blair. 27 Q You do think beaute Blair and 28 someone clae, but I know someone that was 19 representing him — two ladies came the first day 2 you want they were representing 2 M. A Correct. 3 A Correct. 4 Q You do think person working with them, so I'm 3 A Correct when the was a contain the supplied of a hird floor that was the day you said 2 you ladd them to look at certain the floor of the same work of the start of the supplied of the		
3 A I tried to. It was definitely very quiet 4 A The following week. 5 Q Do you remember the date? Q 2-05:17 6 A I don't remember. 7 Q So for be week following as in— 8 A When they came to the property to subpoons 9 the floorage. The not sure what date that is. 9 that. 10 Q So the incident allegedly happened on the O2-05:29 11 2 list, is that right? 12 A Correct. 13 Q It's not the week following the 21st? 14 A I believe it was the week after. 15 Q So the week of the 28th? Q 2-05:37 16 A I believe it was the week after. 17 Q Do you recall what day of the week it was when they came? 19 A Possibly – I'm not certain, so I don't 20 weat to – I'm not exactly sure what day it was. 22 Wasser caming to the building? 23 A I believe that was Laura Wasser and an 24 associate. 24 Q Na was either Laura Wasser and an 25 or Q Was it Blair Burke? 25 Q Was it Blair Burke? 26 Q Was it Blair Burke? 27 Q Do you recall what was cannot be the building. 28 A Correct. It could have been Blair and 9 someone cles, but I know someone that was 100 representing him — two ladies came the first of Laura left. 15 She canly stayed for a brief moment. 16 Q A So that was the day of the first visit or 02-07-05 18 we should not hely them with anything. They need to 19 do their own investigation. 29 Q So that was the day of the first visit or 02-07-05 18 we should not hely them with anything. They need to 19 do their own threstigation. 20 Q So that was the day of the first visit or 02-07-05 21 the day of the second visit? 22 A Laced who had also come that day? 23 A I told them that I didn't need that they should look at? 24 Day to the didn't percentage discussing with 16 Day on the day of the first visit or 02-07-05 21 we day of the second visit? 22 A Second visit. 23 A Correct. It could have been Blair and 9 someone cles, but I know someone that was 100 representing thim — two ladies came the first day 10 representing thim — two ladies came the first day 10 representing thim — two ladies came the second day 12 and one hady that was either Blair or	1 A No.	1 Q had come, and that was the day you said
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25 A Had come. 02:07:15 25 deposition? 02:09:30		

1 A No.	I questions I have.
2 Q Did you meet with Ms. Heard's attorneys at	2 Go off the record.
3 any point	3 THE VIDEOGRAPHER: Going off the record at
4 A No.	4 2;12 p.m.
5 Q between? 02:09:35	5 (Whereupon, a recess was held
6 "No"?	6 from 2:12 p.m. to 2:15 p.m.)
7 A She was at the deposition, though.	7 (Whereupon, a discussion was held
8 Q You hadn't met with them beforehand?	8 off the record.)
9 A No.	9 MR. WRENSHALL: D'Anne, can I get a rough
10 Q Do you recall who took your deposition in 02:09:55	10 by Sunday? 02:12:18
11 the divorce case?	11 THE REPORTER: Do you need a rough, too?
I2 A I don't recall.	12 MS. BILES: Sure.
13 Q Was it Ms. Wasser?	13 THE VIDEOGRAPHER: Going back on the record
14 A I don't recall.	14 at 2:15 p.m.
15 Q Do you recall if it was Ms. Burke? 02:10:17	15 MR. WRENSHALL: We're going back on the 02:15:32
16 A I can see if I no, I don't recall.	16 record.
17 Q Was it a woman who took your deposition on	17 I'm going to ask one more question.
18 Mr. Depp's behalf?	18 BY MR. WRENSHELL:
19 A Yes.	19 Q Ms. Esparza, who was the person who took
20 Q And you don't recall whether it was 02:10:30	20 your deposition, do you recall? 02:15:40
21 Ms. Wasser or Ms. Burke; is that the issue?	21 A Ms. Sutton.
22 A I don't know who took the deposition. I	22 Q Do you remember her first name?
23 forget. It was three years ago.	23 A I do not.
24 Q But it was a woman?	24 Q Was she counsel for Mr. Depp or for
25 A Yes. 02:10:41	25 Ms. Heard? 02:15:48
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1 Q Wasn't the name I'm sorry.	1 A I believe for Mr. Depp.
2 You testified earlier about a general	2 MR. WRENSHALL: No further questions.
3 manager.	3 MS. BILES: I offer the following
4 A Uh-huh.	4 stipulation for the record:
5 Q What is his name, or her name? 02:10:50	5 That the court reporter be relieved of 02:16:01
6 A Brandon Patterson.	6 responsibility with respect to the original
7 Q That's Brandon's position, is general	7 transcript. The original transcript will be
8 manager?	8 transcribed and signed by you under penalty of
9 A Yes, sir.	9 perjury. The court reporter is going to send you a
10 Q Did you ever communicate with any other 02:11:10	10 copy of the deposition transcript. 02:16:14
11 attorney for Mr. Depp?	11 Should we send it to your home address?
12 A No.	12 THE WITNESS: Yes, please.
13 Q Did you ever communicate with Jake Bloom?	13 MR. WRENSHALL: Can you say
14 A No.	14 THE WITNESS: 300 North El Molino Avenue,
15 Q Did you ever communicate with any other 02:11:29	15 Unit 206, Pasadena, California 91101. 02:16:23
16 attorney at the Bloom Hergott law firm?	16 MS. BILES: Once you receive the
17 A No.	17 transcript, is two weeks enough time for you to read
18 Q Do you recall whether the testimony you	18 it and make any corrections, if necessary?
19 gave in the divorce proceeding was designated as	19 THE WITNESS: Yes.
20 confidential? 02:11:42	20 MS. BILES: We'll go ahead and send that to 02:16:36
21 A No.	21 your home address. Once you receive the transcript
22 Q Do you remember signing anything regarding	22 from the court reporter, you'll have two weeks to
23 the confidentiality in that case?	23 review it, make any corrections if you think they
24 A I didn't.	24 are necessary, and you'll sign it. You will send it
25 MR. WRENSHALL: I think those are all the 02:11:53	25 back to Brown Rudnick's office in Irvine, 02:16:53
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1 California. E-mail is fine.	1 STATE OF CALIFORNIA)
2 If we're not notified of any changes within) ss.
3 the two weeks, the original will be deemed correct	2 COUNTY OF LOS ANGELES)
4 and signed.	3
5 And the original transcript will be 02:17:08	4
6 maintained by Brown Rudnick in Irvine, California	5 I, TRINITY CORRINE ESPARZA, declare
7 and make it available at the time of any hearing in	6 under penalty of perjury that the foregoing
8 this matter.	7 testimony is true and correct to the best of my
9 If the original transcript is not	8 knowledge and belief.
10 available, a certified copy of the same as corrected 02:17:22	9
11 can be used for all purposes for which the original	10 Dated this day of, 2019.
12 could be used.	11
13 So stipulated?	12
14 MR. WRENSHALL: So stipulated.	13 (TRIBUTY CORRING ESPARZA)
15 THE REPORTER: Thank you. 02:17:34	14 (TRINITY CORRINE ESPARZA) 15
16 THE VIDEOGRAPHER: We're off the record at	16
17 2:17 p.m. and this concludes today's testimony given	17
18 by Trinity Corrine Esparza. The total number of	18
19 media used was two and will be retained by Veritext	19
20 Legal Solutions. Thank you. 02:17:50	20
21 THE REPORTER: Do you need this transcript	21
22 expedited?	22
23 MR. WALDMAN: Yes.	23
24 MS. BILES: By Monday.	24
25 MR, WALDMAN: Yes. 02:19:07	25
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1 THE REPORTER: Okay. Thank you.	1 STATE OF CALIFORNIA)
2	2 COUNTY OF LOS ANGELES) ss.
3 (Whereupon the deposition proceedings	3 I, D'Anne Moungey, C.S.R. No. 7872 in and
4 were concluded at 2:19 p.m.)	4 for the State of California, do hereby certify:
5	5 That prior to being examined, the witness
6	6 named in the foregoing deposition was by me duly
7	7 sworn to testify to the truth, the whole truth, and
8	8 nothing but the truth;
9	9 That said deposition was taken down by me
10	10 in shorthand at the time and place therein named and
11	11 thereafter reduced to typewriting under my
12	12 direction, and the same is a true, correct, and
13	13 complete transcript of said proceedings;
14	14 That if the foregoing pertains to the
15	15 original transcript of a deposition in a Federal
16	16 Case, before completion of the proceedings, review
17	17 of the transcript { } was { } was not required.
18	18 I further certify that I am not interested
19	19 in the event of the action.
20	Witness my hand this January 28, 2019
21	21
22	22
23	23 24
24	Certified Shorthand Reporter
25	25 For the State of California
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[& - 8:00]

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