

Claim No QB-2018-006323
 IN THE HIGH COURT OF JUSTICE
 QUEEN'S BENCH DIVISION
 MEDIA AND COMMUNICATIONS LIST
 Royal Courts of Justice,
 Strand,
 London, WC2A 2LL.
 Monday, 13th July, 2020

Before:
 MR. JUSTICE NICOL

BETWEEN:

JOHN CHRISTOPHER DEPP II
 Claimant

-and-
 (1) NEWS GROUP NEWSPAPERS LIMITED
 (2) DAN WOOTTON
 Defendants

(Computer-aided transcript of the Stenograph Notes of
 Marten Walsh Cherer Limited, 2nd Floor, Quality House,
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MR. DAVID SHERBORNE, MS. ELEANOR LAWS QC and MS. KATE WILSON
 (instructed by Schillings) appeared for the Claimant.
 MS. SASHA WASS QC, MR. ADAM WOLANSKI QC and MS. CLARA HAMER
 (instructed by Simons Muirhead & Burton) appeared for
 the Defendants.

PROCEEDINGS
 (DAY 5)

(TRANSCRIPT PREPARED WITHOUT ACCESS TO COURT BUNDLES)

1 DEPP - SHERBORNE
 2 Q. The allegation against you, and I am going to read it to you
 3 very briefly -- actually I am just checking my reference.
 4 Perhaps it is easier if I summarise it rather than taking up
 5 time. It is suggested to you, as Ms. Wass put it, that you
 6 punched her repeatedly and you hit her and you grabbed her by
 7 the hair with one hand. Actually, it is easier if I do take
 8 you to. Can I ask you to look at this. I think it is in
 9 bundle 2. This is Ms. Heard's witness statement. It should
 10 be tab 60 in bundle 2. It is page E30 and that should be
 11 paragraph 132 of her witness statement. Do you see that?
 12 A. I do indeed, yes.
 13 Q. What she describes there, she says, four lines up, "I lunged
 14 at Johnny to stop him from hitting my sister and struck him to
 15 protect her, instinctive reaction", then this, "Johnny grabbed
 16 me by the hair with one hand"; do you see that?
 17 A. I do.
 18 Q. "And hit me repeatedly in the head with the other." So, the
 19 allegation is that you grabbed her by the hair with one hand
 20 and you hit her repeatedly with the other. I am just going to
 21 ask you a few questions, Mr. Depp. The day your finger was
 22 cut was 8th March?
 23 A. Yes.
 24 Q. So, this is about two weeks later. Can I ask you, after your
 25 finger was cut off, was it left just unprotected with

1 DEPP
 2 MR. JOHN CHRISTOPHER DEPP, RECALLED
 3 RE-EXAMINATION BY MR. SHERBORNE, CONTINUED
 4 MR. JUSTICE NICOL: Good morning. Yes, Mr. Sherborne.
 5 MR. SHERBORNE: May it please your Honour.
 6 When we broke off on Friday, we had just dealt,
 7 Mr. Depp, with the three-day hostage situation, as Ms. Heard
 8 called it, in Australia in March 2015, and you explained how
 9 your finger was cut and that is how we left it on Friday. We
 10 are now back in Los Angeles and what is the alleged ninth
 11 incident a couple of weeks later on 23rd March of that year,
 12 2015. Just to remind you, with no discourtesy to you at all,
 13 Mr. Depp, I am going to ask you primarily yes or no questions
 14 just because of the time. So, 23rd March 2015, you explained
 15 to Ms. Wass you were having an argument with Ms. Heard on the
 16 mezzanine level in the Eastern Columbia Building; is that
 17 right.
 18 A. Yes.
 19 Q. And you said that you described Ms. Heard as looking for a
 20 fight; do you remember describing her in that way?
 21 A. Yes.
 22 Q. And that is the incident where Ms. Heard admits that she
 23 lunged at you and hit you in front of her sister, Whitney, she
 24 says -- do you remember her saying that?
 25 A. Yes, I do.

1 DEPP - SHERBORNE
 2 something on it, or how was it left?
 3 A. I flew back from Australia to Los Angeles to have surgery on
 4 the finger. At that time, they had put a pin in it, in the
 5 broken bone, the fractured bone, but to no avail, and then
 6 I ended up getting MRSA from it.
 7 Q. You ended up getting?
 8 A. MRSA. It is quite a painful disease.
 9 Q. Yes, can I take you to a picture. It is file 6 and it is tab
 10 148B, my Lord?
 11 MR. JUSTICE NICOL: Just a minute. (Pause)
 12 MR. SHERBORNE: It is page F894.069. I am not sure you will find
 13 the 069 so easy to read because it is on a photograph, but if
 14 you look for the 068, it is to the right-hand side of that
 15 page. It is about halfway, my Lord, through that tab.
 16 A. Yes.
 17 Q. Wait one second, sorry, Mr. Depp, I am just waiting for his
 18 Lordship to find it.
 19 A. Yes. (Pause)
 20 Q. Your Lordship, if you look on the left-hand side, the easiest
 21 anchoring point is to find 068, F894.068. Then, on the
 22 right-hand side, can you just explain what that was?
 23 A. Well, that was my ----
 24 Q. Hold it up so I am sure you have the same -- yes. I am
 25 grateful, Mr. Depp.

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<p>1 DEPP - SHERBORNE</p> <p>2 A. That is my cast from the finger injury, after the surgery,</p> <p>3 post-op.</p> <p>4 Q. Can you explain what the design is on that cast?</p> <p>5 A. It is a little dinosaur.</p> <p>6 Q. Was that the cast that was given to you or did you choose it?</p> <p>7 A. I figured, since I was going to be wearing this ridiculous</p> <p>8 cast with a giant finger, I should have the children's wrap</p> <p>9 around so at least it would make more fun.</p> <p>10 Q. Can I just take you over the page. Just so we can get an idea</p> <p>11 of the date of this, can you see, over the page, that it has</p> <p>12 got about two lines down, the exit date time?</p> <p>13 A. Yes, sir.</p> <p>14 Q. We do not need to worry too much about the exact time. It is</p> <p>15 just the date. Can you see it says 18th March 2015?</p> <p>16 A. Yes.</p> <p>17 MR. JUSTICE NICOL: 18th March?</p> <p>18 MR. SHERBORNE: Yes. You will see it in various forms down the</p> <p>19 page. I do not need to take you to every single one. This is</p> <p>20 the cast that is put on your hand, on the 18th, five days</p> <p>21 before this incident.</p> <p>22 A. I do not recall when the cast, when the cast was put on my</p> <p>23 hand, but it was directly after surgery certainly, yes.</p> <p>24 Q. Mr. Depp, were you wearing this cast on 23rd March, the date</p> <p>25 of this incident when you had this argument with Ms. Heard on</p>	<p>1 DEPP - SHERBORNE</p> <p>2 up the entire train?</p> <p>3 A. No, sir.</p> <p>4 Q. Did you just have your own cabin?</p> <p>5 A. Yes.</p> <p>6 Q. Did you keep yourself to yourself or did you mix with the</p> <p>7 staff and so on; how did you conduct yourself during that?</p> <p>8 A. Well, you become quite familiar with the staff after a few</p> <p>9 days and they were kind enough ----</p> <p>10 MR. JUSTICE NICOL: The staff you are talking about are the</p> <p>11 railway staff or the security staff?</p> <p>12 MR. SHERBORNE: Yes, the railway staff.</p> <p>13 THE WITNESS: That is what I had understood, yes.</p> <p>14 Q. My Lord was right to ask. We used the term before for people</p> <p>15 who were working with you, as you describe?</p> <p>16 A. Yes, indeed. Yes, we, the railroad staff were very</p> <p>17 accommodating in terms of, when there is a crowded dining car,</p> <p>18 things can tend to get a little bit strange, you know, people</p> <p>19 take photographs of you eating and stuff. So, they were kind</p> <p>20 enough to, at a certain point, they had one dining car that</p> <p>21 was empty, just for us; Malcolm would sit at the opposite end</p> <p>22 of the dining car.</p> <p>23 Q. Other than dining, would you spend some time with the railway</p> <p>24 staff or not?</p> <p>25 A. Most of the time, because you cannot smoke cigarettes in the</p>
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<p>1 DEPP - SHERBORNE</p> <p>2 the stairs; yes or no?</p> <p>3 A. Yes.</p> <p>4 Q. With that cast on, would you have been able to grab her hair</p> <p>5 with one hand and punch her repeatedly in the head with the</p> <p>6 other?</p> <p>7 A. No, sir.</p> <p>8 Q. Thank you.</p> <p>9 MR. JUSTICE NICOL: Just a moment. (Pause) Thank you.</p> <p>10 MR. SHERBORNE: Can I take you then to the next alleged incident,</p> <p>11 Mr. Depp, incident 10 on the Southeast Asia train. This was</p> <p>12 part of your honeymoon; is that right?</p> <p>13 THE WITNESS: Yes.</p> <p>14 Q. It is July 2015. Can I ask, was it just you and Ms. Heard who</p> <p>15 were present on the train?</p> <p>16 A. We travelled with security, Malcolm Connolly, he was with us</p> <p>17 for the entire honeymoon, for the trip.</p> <p>18 Q. You were not asked many questions about this by Ms. Wass, so</p> <p>19 I am going to keep it very brief. We know that Ms. Heard's</p> <p>20 evidence is that you were very violent, according to her, you</p> <p>21 hit her, you pushed her against the wall, you grasped her by</p> <p>22 the throat and you caused her to fear for her very life; you</p> <p>23 have seen that is what she says?</p> <p>24 A. Yes, I have seen it.</p> <p>25 Q. I want to ask you a few questions. Did you and Ms. Heard buy</p>	<p>1 DEPP - SHERBORNE</p> <p>2 train, you have to go to the back of the train and smoke on</p> <p>3 the outside, sort of, car, the bar car and then it is outside.</p> <p>4 So, I would go down there quite a lot, and sure, got fairly</p> <p>5 friendly with the staff, who were very kind.</p> <p>6 Q. Mr. Depp, were you violent at all to Ms. Heard during that</p> <p>7 train journey?</p> <p>8 A. No. No, not at all.</p> <p>9 Q. Can I take you to the next alleged incident, which is</p> <p>10 Thanksgiving, 26th November 2015. Mr. Depp, this was not even</p> <p>11 put to you by Ms. Wass, but I need to ask you a few questions,</p> <p>12 as Ms. Heard will no doubt give evidence about it.</p> <p>13 MR. JUSTICE NICOL: This is Thanksgiving of which year?</p> <p>14 MR. SHERBORNE: November 26th, 2015.</p> <p>15 MS. WASS: My Lord, it cannot arise out of cross-examination</p> <p>16 because I did not deal with it, it is in Mr. Depp's statement</p> <p>17 and, in my submission, it is not appropriate to re-examine on</p> <p>18 the subject of something that has not been the subject of</p> <p>19 cross-examination. That is the rule.</p> <p>20 MR. SHERBORNE: My Lord, the problem is this, because Ms. Wass did</p> <p>21 not actually put it to Mr. Depp, she has not challenged his</p> <p>22 evidence.</p> <p>23 MR. JUSTICE NICOL: If she has not challenged his evidence, there</p> <p>24 we are.</p> <p>25 MR. SHERBORNE: My Lord, so be it.</p>

[2] (Pages 697 to 700)

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<p>1 DEPP - SHERBORNE</p> <p>2 MR. JUSTICE NICOL: Is not Ms. Wass right that re-examination</p> <p>3 needs to be confined to matters that were put in</p> <p>4 cross-examination.</p> <p>5 MR. SHERBORNE: My Lord, it does, but if Ms. Heard is going to</p> <p>6 give evidence about it, your Lordship will see ----</p> <p>7 MR. JUSTICE NICOL: Then you can make your points in due course</p> <p>8 that it was not put.</p> <p>9 MR. SHERBORNE: I will, my Lord. (To the witness) Can we turn</p> <p>10 then to the next supposed incident, which was 15th December</p> <p>11 2015, incident 12 in December 2015.</p> <p>12 THE WITNESS: Yes.</p> <p>13 Q. This was the argument on 15th December, just so we are all</p> <p>14 clear, and that was the night before Ms. Heard was due to be</p> <p>15 filming for an appearance on the James Corden show, the Late</p> <p>16 Late Show?</p> <p>17 A. Yes, sir.</p> <p>18 Q. I am not going to go through it in detail, as the allegations</p> <p>19 were put to you, but there was said to be a litany of violence</p> <p>20 and you denied those allegations that were put to you by</p> <p>21 Ms. Wass; do you remember?</p> <p>22 A. Yes.</p> <p>23 Q. Also you denied many of the details of the argument as well;</p> <p>24 do you remember doing that?</p> <p>25 A. Yes, sir.</p>	<p>1 DEPP - SHERBORNE</p> <p>2 MR. SHERBORNE: I am not going to read it out, but this is your</p> <p>3 witness statement, you are talking about the incident on</p> <p>4 15th December. It says: "I understand from my solicitors at</p> <p>5 paragraphs 18A(15) to 18A(20) it is alleged", and then you set</p> <p>6 out there what was alleged against you in the defence</p> <p>7 document, that you threw a decanter at her, you knocked her</p> <p>8 around, you slapped her, grabbed her by the hair, dragged her</p> <p>9 through the apartment, she ran away, you grabbed her again,</p> <p>10 you shoved her twice and so on. I am not going to read it all</p> <p>11 again, it goes over on to the second page and we have another</p> <p>12 whole page of it; do you see?</p> <p>13 A. Yes, sir.</p> <p>14 Q. Just wait until his Lordship has made a note. Then, at the</p> <p>15 bottom, this is the bit you were I think referred to by</p> <p>16 Ms. Wass. "I was at the penthouse in which I live with</p> <p>17 Ms. Heard, on 15th December" -- so, you are dealing globally</p> <p>18 with all of this -- "but I was not violent towards Ms. Heard</p> <p>19 in any way. In fact, on this day, Ms. Heard violently</p> <p>20 attacked me as she had done many times before, leaving with a</p> <p>21 number of scratches and swelling around my face. Ms. Heard had</p> <p>22 fabricated these allegations, including falsely claiming the</p> <p>23 blond hair on the floor was her hair that had been pulled out</p> <p>24 by me", and you explain that this was one of the periods where</p> <p>25 Ms. Heard was continually arguing and would physically assault</p>
<p>[Page 702]</p> <p>1 DEPP - SHERBORNE</p> <p>2 Q. But what you said to Ms. Wass was that during the argument, as</p> <p>3 Ms. Heard was punching you and hitting you from behind, you</p> <p>4 turned around and you grabbed her arms, you grabbed around her</p> <p>5 arms was the gesture you did to stop her from punching you.</p> <p>6 Do you remember giving that evidence?</p> <p>7 A. Yes.</p> <p>8 Q. I think, quite fairly to you, you said that your foreheads may</p> <p>9 have clashed in that process, that was the description you</p> <p>10 gave to Ms. Wass; do you remember?</p> <p>11 A. Yes.</p> <p>12 Q. Ms. Wass then took you to, I think you described it as close</p> <p>13 quarters, her arms were flailing around. I think that was the</p> <p>14 phrase you used.</p> <p>15 A. Yes, that was the only way I could get my arms to lock her</p> <p>16 arms from hitting me.</p> <p>17 Q. Ms. Wass then took you to your witness statement, and I am</p> <p>18 going to take you briefly, because I said I would, when you</p> <p>19 were being asked. It is file 2, tab 38.</p> <p>20 MR. JUSTICE NICOL: Just a minute. (Pause) Yes.</p> <p>21 MR. SHERBORNE: It is paragraphs 77, which should be on page D43,</p> <p>22 it starts there. Do you have it?</p> <p>23 THE WITNESS: I do, yes.</p> <p>24 MR. SHERBORNE: Does your Lordship have it?</p> <p>25 MR. JUSTICE NICOL: I do.</p>	<p>[Page 704]</p> <p>1 DEPP - SHERBORNE</p> <p>2 you, and you explained she would have had very severe injuries</p> <p>3 if that had taken place. I am sorry to ask you this again,</p> <p>4 but given the way it was put by Ms. Wass, what she suggested,</p> <p>5 for the avoidance of any doubt, Mr. Depp, were you violent</p> <p>6 toward Ms. Heard in any way during this argument?</p> <p>7 A. No, sir.</p> <p>8 Q. To use Ms. Heard's phrase, did you intend to headbutt her; yes</p> <p>9 or no?</p> <p>10 A. Not at all. No, sir.</p> <p>11 Q. Did you deliberately -- sorry, just watching his Lordship's</p> <p>12 pen.</p> <p>13 MR. JUSTICE NICOL: Yes.</p> <p>14 MR. SHERBORNE: Did you deliberately strike her nose, causing it</p> <p>15 to be bashed up, I think is her phrase at one point; yes or</p> <p>16 no?</p> <p>17 THE WITNESS: No, sir.</p> <p>18 Q. Did you do anything, other than touch foreheads, as you said,</p> <p>19 Mr. Depp, bump foreheads; yes or no?</p> <p>20 A. No, sir.</p> <p>21 Q. It was then suggested to you, Mr. Depp, that because this was</p> <p>22 not mentioned in your witness statement, that you have</p> <p>23 invented this since 12th December 2019. I am going to deal</p> <p>24 with this very briefly, that is the date of your witness</p> <p>25 statement, 12th December 2019, it was suggested if it is not</p>

[3] (Pages 701 to 704)

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<p>1 DEPP - SHERBORNE</p> <p>2 in your witness statement, you invented it. Can I ask you</p> <p>3 about the transcript of a meeting between you and -- probably</p> <p>4 I do need to take you to it. I am trying to take this as</p> <p>5 quickly as possible, my Lord, but I probably need to take you</p> <p>6 to a transcript. It is in bundle 5 and it should be tab 161N.</p> <p>7 MR. JUSTICE NICOL: N or M.</p> <p>8 MR. SHERBORNE: N for November, my Lord, it should be. It should</p> <p>9 be F. (To the witness) Before I take you to it, just to put</p> <p>10 this in context, this was the meeting you spoke about right at</p> <p>11 the start of your evidence between you and Ms. Heard in San</p> <p>12 Francisco in a hotel, it was the second day, I think, of a</p> <p>13 meeting which Ms. Heard had asked you for; is that correct.</p> <p>14 THE WITNESS: That is correct.</p> <p>15 Q. At that point, as you said, she had obtained a restraining</p> <p>16 order saying she was in fear of her life and so on.</p> <p>17 A. Yes.</p> <p>18 Q. Do you remember, in the restraining order, how far it said you</p> <p>19 needed to keep away from Ms. Heard?</p> <p>20 A. I believe it was something like 150 feet, or something,</p> <p>21 something to that degree.</p> <p>22 Q. You explained to the court that you met with her, at her</p> <p>23 request, in this hotel in San Francisco and this recording was</p> <p>24 made without your knowledge?</p> <p>25 A. Yes.</p>	<p>1 DEPP - SHERBORNE</p> <p>2 again. I ask you this: given what you have just seen,</p> <p>3 Mr. Depp, I am going to put it to you, have you recently</p> <p>4 invented the suggestion since December 2019 that you bumped</p> <p>5 foreheads and that Ms. Heard was trying to make it into you</p> <p>6 intentionally smacking her on the nose, as she suggests?</p> <p>7 A. I did not intentionally.</p> <p>8 Q. Have you invented this since December 2019?</p> <p>9 A. Certainly not, no.</p> <p>10 Q. You were then shown a photo ---</p> <p>11 MR. JUSTICE NICOL: Can I put file 5 away?</p> <p>12 MR. SHERBORNE: Yes, my Lord. If your Lordship can take file 6,</p> <p>13 if you are in the vicinity of the bundles.</p> <p>14 (To the witness) You were then shown photos of injuries,</p> <p>15 supposedly caused by the litany of assault, punching her</p> <p>16 repeatedly in the head, dragging her by the hair up the stairs</p> <p>17 and so on. Can I take you to file 6, tab 148C.</p> <p>18 MR. JUSTICE NICOL: Mr. Sherborne, I have been given an additional</p> <p>19 file with some photographs. Do you want me to look at the</p> <p>20 original file 6 ?</p> <p>21 MR. SHERBORNE: I was literally handed this at court, so I have</p> <p>22 not looked at it.</p> <p>23 MR. JUSTICE NICOL: Then I will keep it with the original file.</p> <p>24 MS. WASS: Can I help. What has happened, these are not new</p> <p>25 photographs that have been put in the bundle. These are the</p>
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<p>1 DEPP - SHERBORNE</p> <p>2 Q. I am going to show you very briefly a passage which should,</p> <p>3 I think, internal page 6, which I think equates to -- yes, is</p> <p>4 it, it is 17. If you start at the bottom of 17, you will see,</p> <p>5 right at the bottom, you say to her: "Did I fucking scream</p> <p>6 when your god damn attorney was on the phone? Would you like</p> <p>7 me to scream while your attorney is on the phone? I'd like to</p> <p>8 but I didn't, but you did." So, you were talking about her</p> <p>9 screaming at you while you were on the phone to your</p> <p>10 solicitor?</p> <p>11 A. Yes, sir.</p> <p>12 Q. I do not think it is in issue, but just in one sentence, what</p> <p>13 were you speaking to your solicitor about on the tape? You</p> <p>14 can hear it.</p> <p>15 MR. JUSTICE NICOL: Well.</p> <p>16 MR. SHERBORNE: I do not need to. Then you have: "Yes, but,</p> <p>17 thanks for your sorry". She wrote: "You'd been screaming,</p> <p>18 it's like somehow ...(reads to the words)... I couldn't</p> <p>19 believe you did that, forehead, that does not break a nose."</p> <p>20 The she said: I don't know if you are aware, I don't think</p> <p>21 you did. I don't think you broke it. ...(reads to the</p> <p>22 words)... You know what, here's the deal, we are never going</p> <p>23 to settle this", and so on.</p> <p>24 Now, you have already explained to the court what</p> <p>25 happened, Mr. Depp, so I am not going to ask you to do that</p>	<p>1 DEPP - SHERBORNE</p> <p>2 existing photographs, but of proper quality on photographic</p> <p>3 paper. There is no new material. If it does not bother</p> <p>4 Mr. Sherborne, then he can re-examine Mr. Depp exactly the way</p> <p>5 he wants to; but I will be using the better quality</p> <p>6 photographs for the remainder of the case. Sorry, they are in</p> <p>7 the witness bundle, so the witness will have them.</p> <p>8 MR. SHERBORNE: I am going to use the photograph which was</p> <p>9 actually shown to Mr. Depp. It is only fair to him to do</p> <p>10 that. If Ms. Wass wants to use other photographs at some</p> <p>11 point, she can.</p> <p>12 Mr. Depp, you were taken to a particular photo.</p> <p>13 MR. JUSTICE NICOL: So, which tab are we in now?</p> <p>14 MR. SHERBORNE: We are in 148C and it is page F894.103.</p> <p>15 (To the witness) When Ms. Wass asked you before she</p> <p>16 showed you, she said, you said you had not seen any injuries</p> <p>17 at all. Do you remember, after the incident?</p> <p>18 THE WITNESS: Yes. Yes.</p> <p>19 Q. And then you were shown this photo?</p> <p>20 A. Yes.</p> <p>21 Q. If there had been these bruises or black eyes after the</p> <p>22 incident, would you have seen them, Mr. Depp; yes or no?</p> <p>23 A. I believe it would be visible immediately.</p> <p>24 MR. JUSTICE NICOL: Just a minute.</p> <p>25 THE WITNESS: Pardon.</p>

[4] (Pages 705 to 708)

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1 DEPP - SHERBORNE
 2 MR. JUSTICE NICOL: (Pause) Yes.
 3 MR. SHERBORNE: Can I take you, then, to file 4.
 4 MR. JUSTICE NICOL: Just a moment. Can we put 6 away?
 5 MR. SHERBORNE: My Lord, yes, we can. It is tab F139 and
 6 page F880.
 7 MR. JUSTICE NICOL: 880 is the first page in my tab 139.
 8 MR. SHERBORNE: I am grateful, my Lord, I am just waiting for
 9 Mr. Depp.
 10 THE WITNESS: Yes, thank you.
 11 Q. To help us, these were the notes of Nurse Erin Burin, I may
 12 not be pronouncing her name right.
 13 A. I believe that is right, Burin.
 14 Q. You explained Friday that she was the nurse for Ms. Heard?
 15 A. Yes.
 16 Q. She was also a friend too, and she was at Ms. Heard's birthday
 17 party; which we will come to in a minute.
 18 A. That is correct.
 19 Q. We can see that on 16th December, so the day after the
 20 incident, she receives a call from Ms. Heard, can we see that,
 21 "Client contacts RN by phone".
 22 A. Yes, sir.
 23 Q. "She states she had an argument with her husband the previous
 24 night. She states husband has left home and unaware of his
 25 location....(reads to the words)... and a bruised eye." This

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1 DEPP - SHERBORNE
 2 is all over the telephone, obviously, to Nurse Burin, and she
 3 encouraged to notify Dr. Kipper or go to the emergency room if
 4 she was injured or felt like she was in danger, and she
 5 declines. States her friend Rocky was with her, and that
 6 husband will not be able to re-enter the home.
 7 A. Yes.
 8 Q. That is just to help us on the chronology. That night is when
 9 she appears on the filming of the James Corden show, is it
 10 not, 16th December?
 11 A. It was not the 16th I believe.
 12 Q. That is what the nurse said. She is told about a forehead
 13 bruise but nothing else. Then, if we see 17th December --
 14 this is the next entry -- she is called there ---
 15 MR. JUSTICE NICOL: Just a minute. (Pause) Did you say that the
 16 only reference to an injury was the bruised forehead?
 17 MR. SHERBORNE: All she says in terms of the violence -- you
 18 remember the series of violent acts supposedly carried out --
 19 all she refers to is "used his forehead to hit her head".
 20 That is all ---
 21 MR. JUSTICE NICOL: There is the sentence, "states she has
 22 headache and bruised eye".
 23 MR. SHERBORNE: Yes, exactly. That is what she tells the nurse.
 24 MR. JUSTICE NICOL: Then you were going to go to 17th December.
 25 MR. SHERBORNE: Yes. She tells the nurse she has a headache and a

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1 DEPP - SHERBORNE
 2 bruised eye. The nurse says, "If you have any injuries, you
 3 should go to hospital" and she declines to do so. The nurse
 4 comes out on 17th December, the next day. "The nurse is in
 5 contact with the client to notify her that she will be able to
 6 deliver medications to her home." So this is her friend,
 7 Nurse Burin, offering to come to the house. Then she says,
 8 "The nurse waited at the door for several minutes after
 9 knocking. Client greeted the nurse at the door, looking
 10 dishevelled, hair appeared unbrushed, client appeared weepy
 11 and sad, posture slouched. Client told nurse about argument
 12 with husband. Nurse offered emotional support, but reminded
 13 client that the nurse could not stay as she was on duty with
 14 another client and was only visiting in order to deliver
 15 medication. The client said she had not had contact with the
 16 husband since the altercation. The client had visible bright
 17 red blood appearing at the centre of her lower lip. When the
 18 nurse made the client aware she had actively bleeding on her
 19 lip, she stated it was from the injury sustained in the
 20 argument between her and her husband and it continues to bleed
 21 actively. Client also states her head is bruised and she lost
 22 clumps of hair in the altercation." Then you will see that
 23 the nurse looks at her scalp, but is unable to visualise the
 24 haematoma, so she does not see any bruising that the client
 25 had described. Then she is encouraged to be seen by the

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1 DEPP - SHERBORNE
 2 physician, Dr. Kipper, or to go to emergency for thorough
 3 assessment. She states she will contact Kipper tomorrow and
 4 then you will see references to being supported and comforted
 5 by her friends.
 6 So, I am going to ask you this. The registered nurse
 7 clearly does not see any bruises or any haematomas, as she
 8 describes it, and she cannot find anything on the scalp to
 9 show that hair is pulled out. All she sees is a bit of active
 10 bleeding on her lip, which I will come to in a second.
 11 Perhaps I can ask you this. Mr. Depp, in answer to your
 12 question to Ms. Wass, when shown a photo of Ms. Heard with her
 13 lips looking quite dry, you explained something about chapped
 14 lips. Can you briefly expand on that?
 15 A. She was always susceptible to, or it was normal that she had
 16 pretty dry lips, so she was constantly using a lip balm
 17 because they were very dry and would get chapped and she would
 18 pick at ---
 19 Q. She would pick at her lips?
 20 A. Yes.
 21 Q. You just did an action and actions do not, unfortunately, get
 22 picked up on the transcript?
 23 A. She would pick at the dryness and the dry skin.
 24 Q. What would happen when she picked at the dry skin?
 25 A. Just like anything, you would bleed, if you are pulling a scab

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1 DEPP - SHERBORNE
 2 off.
 3 Q. Mr. Depp, given that the registered nurse saw none of bruises,
 4 I am going to have to ask you this. Is Nurse Burin another
 5 one of your supposed paid lackeys who would say whatever you
 6 wanted them to say?
 7 A. No, sir, on the contrary, she is a professional nurse.
 8 Q. This is the last question on this alleged incident. You were
 9 taken to various exchanges by Ms. Wass between Ms. Heard and
 10 -- I am just trying to put this file away, sorry, bear with me
 11 one second while I find the right place. You were taken to
 12 various exchanges between Ms. Heard and her mother and father,
 13 if you remember, when she spoke with them about what had
 14 happened during your argument on the 15th. Do you remember
 15 seeing those?
 16 A. Yes, I do.
 17 Q. She gave her account to them, obviously, of what had happened
 18 and you were taken to a text from David Paige, that is
 19 Ms. Heard's father, to you?
 20 A. David Heard.
 21 Q. David Heard, sorry. I am not going to take you back through
 22 it because we already have, but if you need to see it, please
 23 tell me. Effectively, what he said to you was, "I understand
 24 a little more about what went on. I know Amber needs help
 25 with her temper, the same as you do with your problems with

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1 DEPP - SHERBORNE
 2 drugs and alcohol". Do you remember?
 3 A. I do.
 4 Q. Then he said, "but I still love you like a father or brother".
 5 Do you remember he used that phrase?
 6 A. I do.
 7 Q. A sort of father-to-father type message. Did he send any
 8 messages like that at all?
 9 A. Yes.
 10 Q. You remember that he wrote that in the text so my question is
 11 this, Mr. Depp. If Lily-Rose -- and it is just a yes or no
 12 answer -- if Lily-Rose told you that her husband had slapped
 13 her ----
 14 MR. JUSTICE NICOL: Just a minute. If Lily-Rose?
 15 MR. SHERBORNE: If your daughter had told you, Mr. Depp -- so this
 16 is Mr. Heard, Amber Heard's father texting you -- if your
 17 daughter had told you that her husband had slapped her,
 18 repeatedly punched her, deliberately smacked her in the nose,
 19 grabbed her by the hair, dragged her upstairs by the hair and
 20 large chunks of her hair had been pulled out, would you still
 21 send a text to him saying, "I love you like a father"?
 22 A. Definitely not.
 23 Q. Thank you. Can I take you to the next alleged incident. This
 24 is Ms. Heard's birthday party, incident 13, April 2016?
 25 A. Yes, sir.

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1 DEPP - SHERBORNE
 2 Q. I do not think there is an easy way of doing this because
 3 there are no cups in court so, Mr. Depp, I am sure everyone
 4 will understand if you drink from the bottle.
 5 A. Thank you.
 6 Q. I am going to do the same, I am sorry. You explained that you
 7 came to Ms. Heard's birthday in your apartment from a meeting?
 8 A. Yes.
 9 Q. And you said it was a bad meeting. Can you just explain,
 10 again very briefly, why it was bad?
 11 A. I was in the early stages of learning from my recently
 12 acquired new business manager that the former business
 13 managers had absconded quite a lot of my money. They had
 14 stolen my money.
 15 Q. Do you mind telling the court how much? I do not know if it
 16 is sensitive or not, but just to give an idea of scale, how
 17 much money had they taken from you?
 18 A. It was put to me this way, because I had no idea about money
 19 or the amount of money it was, but it was put to me that since
 20 Pirates 2 and 3, I had -- and this is a ludicrous number to
 21 have to state and it is quite embarrassing -- apparently I had
 22 made \$650 million, and when I fired them for the right
 23 reasons, I had not only lost the \$650 million, but I was
 24 \$100 million in the hole because they had not paid the
 25 government my taxes for 17 years.

[Page 716]

1 DEPP - SHERBORNE
 2 Q. So, as you say, a bad meeting?
 3 A. Very unpleasant and ugly, yes.
 4 Q. You were asked by Ms. Wass, after the meeting, given how you
 5 said you were upset, if you had taken cannabis, and you said,
 6 quite fairly, that you are not sure, but you may have taken
 7 cannabis, I think you said?
 8 A. It is possible that from the meeting which was held at my
 9 office in the conference room, that on my way down to
 10 Ms. Heard's dinner, it is possible that I would have smoked
 11 some cannabis in the car on the way.
 12 Q. If you had smoked some cannabis, what effect would it have had
 13 on you? Would it have made you angry or in a rage?
 14 A. No, it is a calming agent.
 15 Q. There were a number of people there, as we know, at
 16 Ms. Heard's birthday party, and you said a moment ago that
 17 Nurse Burin was there too?
 18 A. Yes, she was.
 19 Q. Can I just take you to a note she makes. I do not have the
 20 file number. It is K9. It is file 9, my Lord, page K210.
 21 I think it is tab 132.
 22 MR. JUSTICE NICOL: Just a moment. (Pause)
 23 THE WITNESS: Yes.
 24 MR. SHERBORNE: Do you have that?
 25 A. I do.

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1 DEPP - SHERBORNE
 2 Q. You will see the second entry on that page of Nurse Burin's
 3 notes. She explains that on 21st April, "Client invited ----
 4 MR. JUSTICE NICOL: Sorry, this is dated 27th August, is it?
 5 MR. SHERBORNE: No, my Lord, it should be ----
 6 MR. JUSTICE NICOL: I beg your pardon. I have the wrong page.
 7 Which page?
 8 MR. SHERBORNE: K210, my Lord.
 9 MR. JUSTICE NICOL: Just a moment. (Pause) Yes, and the entry for
 10 21st April 2016?
 11 MR. SHERBORNE: My Lord, yes. Do you have that? (Pause)
 12 MR. JUSTICE NICOL: Mr. Depp, do you have that?
 13 A. K210 at the bottom.
 14 MR. SHERBORNE: Yes.
 15 A. Yes, I do, thank you.
 16 Q. So, as you said, Nurse Burin was a friend of Ms. Heard's as
 17 well as a nurse?
 18 A. Yes.
 19 Q. She says that she is "invited to the birthday party at
 20 8 o'clock at her home in downtown Los Angeles to celebrate her
 21 birthday as the client will be attending the Coachella music
 22 festival on the day of her birthday." So we know that the
 23 next day, Ms. Heard went with friends to Coachella?
 24 A. Yes, that is correct.
 25 Q. And the nurse says this: "I arrived with client's UK

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1 DEPP - SHERBORNE
 2 MS. WASS: Could my learned friend read the last two sentences,
 3 please, for completeness?
 4 MR. SHERBORNE: I can, if you just let me get back to the page,
 5 sorry. "That really made sense. Client appeared to be
 6 cordial...(reads to the words)... and escorted guests to the
 7 door around midnight", 12.30. Does that accord with your
 8 recollection?
 9 A. Yes, sir.
 10 Q. Then you were asked by Ms. Wass questions about what happened
 11 when everyone left and you explained that Ms. Heard started an
 12 argument, because she said, like in Hicksville, that you had
 13 made a fool of her in front of her friends?
 14 A. Yes, I had ruined her birthday dinner.
 15 Q. And then you describe how she had hit you?
 16 A. Yes.
 17 Q. Can I take you back to that transcript, which should be in
 18 file 5, and it is 161N. It is the secret recording Ms. Heard
 19 did of your meeting on the second day in July 2016 in the
 20 hotel room in San Francisco.
 21 MR. JUSTICE NICOL: I think I have worked out, Mr. Sherborne, the
 22 problem that I was having is that 161O and 161N are out of
 23 order, but I have sorted it out.
 24 MR. SHERBORNE: I am grateful that your Lordship has sorted it. I
 25 cannot offer an enormous amount of assistance because ----

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1 DEPP - SHERBORNE
 2 assistant", if your Lordship notes that, ".... arrived with
 3 the client's UK assistant, Savannah, at nine o'clock. The
 4 client was socialising with friends" upon Ms. Burin's arrival.
 5 "She appeared irritable and upset." She reports being angry
 6 with husband because he is late and then Nurse Burin provided
 7 reassurance that he would arrive and encouraged her to
 8 distract herself by socialising with friends. Then you will
 9 see she appears to laugh, but her mood turns to depressed and
 10 flat when she is alone. Then she says she cannot believe that
 11 you are not there yet and so on.
 12 Then you arrive. Can you see, "Client's husband, JD,
 13 arrives at 10.15." Then it says this. You appear in good
 14 spirits, you greet her guests, and during dinner you and
 15 Ms. Heard sit next to each another. You appear affectionate
 16 towards one another and then you socialise with Ms. Burin for
 17 about 45 minutes. She says you appear coherent, oriented and
 18 sociable. Does that reflect your recollection of how you
 19 were?
 20 A. Yes.
 21 Q. "Thought processes logical and clear", then you spent time
 22 laughing with Ms. Burin and watching a PSA you and Amber had
 23 made together.
 24 A. Yes.
 25 Q. And then discussed Coachella. As I say, that describes ----

[Page 720]

1 DEPP - SHERBORNE
 2 MR. JUSTICE NICOL: No, that is okay. So, we are at the
 3 transcript of ----
 4 MR. SHERBORNE: We are. It is internal page 14 for me, but I will
 5 give you the reference. (Pause) I do not know if you have got
 6 references at the bottom. Yes, it is F1009 -- do you have
 7 internal pages at the bottom?
 8 MR. JUSTICE NICOL: Not on my copy.
 9 THE WITNESS: No.
 10 MR. SHERBORNE: I am sorry, just bear with me one second. (Pause)
 11 Just give me one second. I am just trying to find it. It is
 12 quite sensitive on the electronic bundle. There we go, it is
 13 on page F1009.23. Do you have that?
 14 A. I do.
 15 Q. And do you see, round about the first hole punch, I hope it
 16 is, that you are saying, "I don't want a divorce"?
 17 A. Yes.
 18 Q. "I don't want a divorce. I never wanted a fucking divorce. I
 19 never wanted a divorce. I didn't want you to fucking go to
 20 Coachella without fucking talking to me because I left you
 21 because you fucking haymaked me, man. You came around the
 22 bed to fucking start punching on me." Can you explained what
 23 "haymaked" means, Mr. Depp?
 24 A. Haymaker is a, it is just a type of a wild swinging, wild
 25 punches, like a round house. A haymaker is ----

[7] (Pages 717 to 720)

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1 DEPP - SHERBORNE

2 Q. Just wait for his Lordship to take a note because you did a

3 visual description. Do you just want to do that again? That

4 will not show up on the transcript.

5 A. A haymaker is a kind of round-house punch, as it were. It is

6 a bit of a wild swing, but effective if it reaches the target.

7 Q. I will just let my Lord make a note. It is not an English

8 term?

9 A. No.

10 MR. JUSTICE NICOL: I have come across it.

11 A. Haymakers? I am sure.

12 MR. SHERBORNE: I am pleased to say I have not. In any event, it

13 is not a term that Ms. Heard takes any issue with, did she?

14 Have a look at what she says next.

15 A. Yes, I see.

16 Q. Do you remember Ms. Heard denying that she hit him?

17 A. No. I do not remember her denying that she hit me.

18 MR. JUSTICE NICOL: You said, did Ms. Heard deny hitting him, but

19 I think actually it is hitting you, Mr. Depp, is it not?

20 MR. SHERBORNE: Yes, sorry. Yes, did she deny hitting you,

21 Mr. Depp?

22 A. At the time, no. No, she did not.

23 Q. It was suggested to you by Ms. Wass that lying in bed,

24 reading, on her birthday, when she came to bed, made Ms. Heard

25 so angry that you provoked her. Mr. Depp, did you deserve to

[Page 722]

1 DEPP - SHERBORNE

2 be punched because you were reading a book on her birthday

3 night?

4 A. Under the circumstances of being harangued and forced into

5 some argument or altercation, I did not think that it was the

6 wrong thing to do. I thought it was best to remove myself

7 from the argument because it seemed ridiculous to me.

8 Q. Is that something you did only once during arguments?

9 A. No, sir, quite a lot.

10 Q. Can we turn then to the next and the last supposed incident,

11 the 21st May 2016. There is really only one question I want

12 to ask you about this, Mr. Depp, because you went through this

13 in some detail and you denied the various allegations put to

14 you. You said to Ms. Wass that you had not spoken to Mr. iO

15 Tillet Wright (that is one of Ms. Heard's friends) for two

16 years?

17 A. Yes.

18 Q. Why did you stop speaking to her -- him, sorry, I apologise.

19 Why did you stop talking to him, Mr. Tillet Wright -- not

20 Ms. Heard, Mr. Tillet Wright?

21 A. Mr. Tillet Wright was a very close friend of Ms. Heard's and

22 had become quite fond of my daughter, Lily-Rose, who was at

23 the time, I believe she was 14 or 15, 15 maybe, or something.

24 Ms Tillet Wright is an activist for the LGBT community. She

25 was doing a series of photographs with a small interview with

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1 DEPP - SHERBORNE

2 the subject, and she had chosen my daughter, Lily-Rose, to be

3 the subject of this essay, whatever she was doing, but it was

4 about sexual preference, things of that nature, and

5 Mr. Tillet Wright did not once ask myself or the mother of our

6 children, Vanessa Paradis, for permission to interview or take

7 photographs of my daughter. My daughter was represented

8 essentially by Tillet Wright's writing, her words, and I took

9 great umbrage to that. I took great offence to that.

10 Q. And that is why you stopped speaking to her?

11 A. That is where it stopped, exactly, yes.

12 MR. JUSTICE NICOL: Just a minute. Ms. Wass, can I ask you this.

13 I want to be respectful to Tillet Wright.

14 MS. WASS: Yes.

15 MR. JUSTICE NICOL: Does Tillet Wright prefer to be referred to as

16 a woman, a man or neither?

17 MS. WASS: It is, as I understand it, Mr. Tillet Wright, who, as

18 my Lord knows, is to be a witness.

19 MR. JUSTICE NICOL: Indeed, which is why I am asking you.

20 MS. WASS: I will ensure that that is the correct understanding

21 before the witness is called.

22 MR. JUSTICE NICOL: Right. I am not being curious; it is just

23 that I would like to make sure that when I come to do a

24 judgment, I acknowledge his preference.

25 MS. WASS: Yes. I hope I have answered my Lord's question.

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1 DEPP - SHERBORNE

2 MR. JUSTICE NICOL: Thank you. So, for the time being, we will

3 continue to refer to Mr. Tillet Wright.

4 MS. WASS: Yes.

5 MR. JUSTICE NICOL: Yes.

6 MR. SHERBORNE: Mr. Depp, you were then asked a question by

7 Ms. Wass. If you turn to file 6, it is tab F199, and it is

8 right towards the back of that tab because we are now in 2016.

9 It is page 188. Do you have that?

10 A. Yes.

11 Q. You were asked about the text about three down. That is

12 written to your sister?

13 A. Yes. Yes, sir.

14 Q. And you say, "I want her replaced on that WB film." What does

15 WB stand for; Warner Brothers?

16 A. Warner Brothers.

17 Q. I think it was put to you that this showed that you were not

18 very nice about Ms. Heard days after the temporary restraining

19 order, when she had told the world you were a wife-beater; is

20 that correct?

21 A. Yes. It was quite a surprise.

22 Q. Can I just ask you, though, to look at the text below when you

23 say, "People don't actually believe her lies???"

24 A. Yes.

25 Q. Can you just very briefly, in one sentence, explain what you

[8] (Pages 721 to 724)

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1 DEPP - SHERBORNE
 2 were saying there to your sister, what you were referring to,
 3 the lies?
 4 A. I was referring to the notion that something like that, these
 5 accusations, coming out so strongly in the five years of fear
 6 for her life, I just thought it is impossible. I mean, how
 7 could people buy it, that story, and yet they did.
 8 Q. Mr. Depp, I am just going to touch on two final topics. The
 9 first is this. I am going to put that bundle away. You
 10 explained to this court on Friday that in your 57 years, you
 11 have never hit a woman; correct?
 12 A. Yes.
 13 Q. No one has suggested that?
 14 A. That is correct.
 15 Q. And I asked but Kate Moss?
 16 A. Yes, sir.
 17 Q. And Winona Ryder is coming to give evidence so I do not need
 18 to ask about that. Even Ellen Barkin, who you were asked
 19 about, who gave that unfavourable deposition for Ms. Heard,
 20 never suggested that you hit her, as we established?
 21 A. Yes.
 22 Q. The most was that you threw a bottle, but not even at her?
 23 A. That is correct.
 24 Q. The same is true, you said, of Ms. Paradis. There is no
 25 suggestion that you have ever hit her. Ms. Wass said to you

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1 DEPP - SHERBORNE
 2 that Ms. Heard was very different to Ms. Paradis; she was a
 3 strong and independent woman. Do you remember her asking you
 4 that?
 5 A. Yes.
 6 Q. Let me ask you this, Mr. Depp. Was Ms. Paradis someone who
 7 would never tell you off?
 8 A. No, no. She was absolutely -- whatever was on her mind, she
 9 would say it. It was an understanding of truth between us.
 10 Q. Was she submissive?
 11 A. Not remotely, no.
 12 Q. Did she never confront you if you did something she did not
 13 like?
 14 A. No, no, she was not afraid to confront me on any subject.
 15 Q. Remind us, how many years were you with Ms. Paradis?
 16 A. A little over 14 years, 14 and a half years.
 17 Q. Finally this, Mr. Depp: Ms. Wass on a few occasions, for
 18 example when she showed you a photo that Ms. Heard had taken
 19 of herself or an e-mail she had written to herself or some
 20 text to her closest friend, she asked you to speculate, do you
 21 remember, as to what Ms. Heard was doing if this violence, the
 22 allegations of violence were not true. Do you remember those
 23 questions?
 24 A. What Ms. Heard was -- oh, yes, sir, I do.
 25 Q. Do you remember it was put to you, you were asked to

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1 DEPP - SHERBORNE
 2 speculate, "What is Ms. Heard doing here with these
 3 photographs, if her allegations of violence were not true".
 4 Do you remember those questions?
 5 A. Yes, I do.
 6 Q. I am just going to ask you a couple of questions about your
 7 answers to that. I do not need to take you to Ms. Heard's
 8 witness statement, unless you want me to, it is the first
 9 witness statement, paragraphs 39 and 43. Do you remember
 10 Ms. Heard in her witness statement says she took photographs
 11 to be able to show you what you had done, because you would
 12 not remember the next day, so she took these photographs of
 13 injuries to her in order to demonstrate to you what you had
 14 done, because you could not remember. Do you remember that is
 15 her evidence?
 16 A. Yes, and the recording, making recordings, also.
 17 Q. She says in her statement, again I do not need to turn it up
 18 unless anyone wants many he to do so: "I never imagined
 19 I would be shown these photos as part of a court case." The
 20 first question is this, Mr. Depp: the photos you have been
 21 shown of her supposed injuries, one in 2013 with her arm and
 22 then the 2015 ones we looked at, that Ms. Wass showed you
 23 before the nurse came and so on, did Ms. Heard show you any of
 24 those photos herself to you the next day to show you what you
 25 had supposedly done?

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1 DEPP - SHERBORNE
 2 A. It was one photograph that Ms. Heard showed me which was from
 3 Boston, when I had already agreed to, I was preparing to go to
 4 the Bahamas to detox from the opiates, and I had work a 17,
 5 16, 17-hour day prior to, and I, she asked me to hold a tub of
 6 ice cream ---
 7 Q. It is the ice cream photo?
 8 A. Yes, there is a photograph, and I have my right hand in my
 9 pocket and I am holding the ice cream here, and it is, I have
 10 obviously fallen asleep, I was obviously on the nod and very
 11 tired, I was falling asleep, and the ice cream then spilled
 12 all over my leg and then she took that photograph, and showed
 13 me the next day, and said, "Look at what", you know, "look at
 14 what you have become, look at you, it is pathetic".
 15 Q. That is the photo we have in the bundle of you lying asleep
 16 with ice cream over you?
 17 A. Yes, and my right hand is in my pocket.
 18 Q. Did Ms. Heard ever show you any photos of any injuries to her
 19 the next day, that had supposedly happened, to demonstrate
 20 what you had done?
 21 A. No, sir.
 22 Q. Had you seen those photographs ---
 23 MR. JUSTICE NICOL: Just a moment, please. (Pause) Yes.
 24 MR. SHERBORNE: Had you seen those photographs of supposed
 25 injuries before this court case started, Mr. Depp?

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1 DEPP - SHERBORNE
 2 THE WITNESS: No, sir.
 3 Q. Your answer to Ms. Wass, when she said you were causing these
 4 injuries to Ms. Heard in fights, when you were speculating,
 5 she was asking you to speculate, was that you now believe that
 6 Ms. Heard was putting a dossier together, an insurance
 7 dossier, I think you described it as?
 8 A. Yes.
 9 Q. It was suggested to you by Ms. Wass that this was a stretch,
 10 this was something Ms. Heard would never have thought of. Do
 11 you remember, she was trying to suggest it was something, yes
 12 or no, do you remember that was put to you, it was a stretch?
 13 A. I do recall that, yes.
 14 Q. Obviously, it is a question for his Lordship as to what
 15 Ms. Heard was or was not doing, but in terms of this being a
 16 stretch for Ms. Heard to even think of this, can I take you to
 17 a transcript. It is, it should be file 4, it may be file 5,
 18 some people have moved their tabs into file 5, but it is
 19 tab 155. I know I am going to pick the wrong one.
 20 MR. JUSTICE NICOL: Just a moment. (Pause) I have it in file 4.
 21 MR. SHERBORNE: File 4. I have it in file 4 as well.
 22 (To the witness) This is a recording, I think, in July
 23 2016, certainly in 2016, we are told. If you go to F969, you
 24 will see in between the two punch holes we have Ms. Heard
 25 talking.

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1 DEPP - SHERBORNE
 2 A. Yes.
 3 Q. In the third sentence, she says: "It would be eye witness
 4 statements, it would be evidence, tons of it, and it would be
 5 through years and it would be unbelievable to imagine that
 6 either I am in a secret fight club or (b) I had had", and you
 7 stop her, and you ask her: "A secret what?" And she says:
 8 "A secret fight club." What do you understand she meant by a
 9 secret fight club, just very briefly?
 10 A. I had no idea. I had never heard the term.
 11 MR. JUSTICE NICOL: Just a minute. (Pause)
 12 MR. SHERBORNE: So you had never heard the term?
 13 THE WITNESS: No, I have never heard the term.
 14 Q. Then she says this, this is the other: "Either (a) a secret
 15 fight club, or (b), that I have been plotting to do this for
 16 three years while taking pictures of it and documenting it
 17 just saving it up for the right time when I am not asking for
 18 any money and have nothing financial to gain from it, no one
 19 is going to believe that." So, Ms. Heard is setting out two
 20 alternatives here: a secret fight club, and then, on the other
 21 hand, in a few words, what did you understand Ms. Heard meant
 22 was the alternative scenario to this secret fight club, the
 23 one which she says no one would believe?
 24 A. What was my understanding of?
 25 Q. Yes.

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1 DEPP - SHERBORNE
 2 A. I have thought, I thought it an odd couple of scenarios, a
 3 secret fight club, which I did not understand what that meant,
 4 and then or have I been keeping all these things. I felt it
 5 was a very odd alternative to the secret fight club, and it
 6 seemed to me, in a strange way a lot of the time, it was
 7 almost as if it was a reverse confession, if you will. It
 8 seemed like everything that she had accused me of was
 9 something she had done to me. So, I started to see this kind
 10 of pattern of mirroring, and when she said that, I was a
 11 little taken aback, for sure.
 12 MR. SHERBORNE: Thank you. Mr. Depp. I have no further questions
 13 for you. I do not know if your Lordship has?
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1 DEPP
 2 QUESTIONS BY THE JUDGE
 3 MR. JUSTICE NICOL: Just a moment. (Pause) Can I ask this,
 4 please, Mr. Depp. I have seen the series of texts that were
 5 exchanged between you and Nathan Holmes.
 6 A. Yes, sir.
 7 Q. Which I think were round about March, February or March 2015.
 8 A. Yes, sir. Yes, my Lord, yes.
 9 Q. At that time, where was Mr. Holmes, was he in Australia, was
 10 he in the United States, can you help?
 11 A. I believe Mr. Holmes was in Australia. I believe he was in
 12 Australia prior to my arrival, first to get the house set up
 13 and buy all of the ----
 14 Q. Because he was one of your assistants?
 15 A. Yes, sir.
 16 Q. I think you told us that you got to Australia in about
 17 February 2015. Does that sound right?
 18 A. That is correct.
 19 Q. So, Mr. Holmes either came out with you at the same time, or
 20 at about the same time?
 21 A. Roughly, as I recall, Mr. Holmes was probably there a few days
 22 before. That would have been the normal protocol, just to get
 23 things ready, and load the house up, stock the fridge and
 24 such, work with the chef.
 25 Q. Another question, still about the drug texts that you were

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1 DEPP - THE JUDGE
 2 exchanging with Mr. Holmes.
 3 A. Yes, sir.
 4 Q. I think your evidence was that you were asking Mr. Holmes --
 5 well, let me ask you, because I am not sure that I recorded an
 6 answer from you. Were you asking Mr. Holmes to acquire drugs
 7 for yourself and for Ms. Heard?
 8 A. Yes, sir. Yes, your Honour, that is.
 9 MR. JUSTICE NICOL: Thank you. Those are the only questions that
 10 I have. Mr. Sherborne, do you have any as a result of mine?
 11 MR. SHERBORNE: My Lord, I do not.
 12 MR. JUSTICE NICOL: Ms. Wass, do you have anything as a result of
 13 mine? (Pause) (No audible reply) Mr. Depp, you have now given
 14 evidence over many days. Thank you for coming to give your
 15 evidence to this court. You may now step down from the
 16 witness box.
 17 THE WITNESS: Thank you very much.
 18 (The witness withdrew)
 19
 20 MR. SHERBORNE: My Lord, I wonder for various practical reasons,
 21 and others, it might be sensible to take the morning break
 22 now. It is a little early, but it may help us to move around.
 23 MR. JUSTICE NICOL: Certainly. I think your next witness is
 24 Mr. Deuters.
 25 MR. SHERBORNE: It is, my Lord; and he is the only other witness

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1 DEPP - THE JUDGE
 2 this morning.
 3 MR. JUSTICE NICOL: Then I will rise, and we will resume in ten
 4 minutes' time.
 5 (A short break)
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 7 MR. JUSTICE NICOL: Yes.
 8 MR. SHERBORNE: May it please your Lordship, can I call our next
 9 witness, Stephen Deuters.
 10 MR. JUSTICE NICOL: Yes.
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1 DEUTERS
 2 MR. STEPHEN DEUTERS, AFFIRMED
 3 EXAMINED BY MR. SHERBORNE
 4 MR. JUSTICE NICOL: Do sit down, Mr. Deuters.
 5 MR. SHERBORNE: Mr. Deuters, before I take you to your witness
 6 statement, can I just ask, the acoustics in this room, it is
 7 quite an old room, if you can make sure you keep your voice up
 8 as much as possible. I know it is very boring to keep asking
 9 you, but if you could, that would be great.
 10 THE WITNESS: Understood, yes.
 11 Q. Can I just by asking you your full name?
 12 A. Stephen Deuters.
 13 Q. Is it pronounced Deuters?
 14 A. Yes. Deuters, yes. It depends on the country. Deuters in
 15 America; Deuters over here.
 16 Q. I will try to stick to Deuters then. If you look to your
 17 right you will see an impressive array of coloured bundles, if
 18 you see the darker blue, it should say file 2 on it?
 19 A. Yes.
 20 Q. If you can take that out, and if you look behind tab 44, do
 21 you see a document there that is described as "The first
 22 witness statement of Stephen Deuters"?
 23 A. I do, yes.
 24 Q. Can I ask you then to turn to the back of that, almost to the
 25 back, can you find a page that should say D109 on it?

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1 DEUTERS - SHERBORNE
 2 A. Yes.
 3 Q. Can you, is that your signature?
 4 A. Yes.
 5 Q. Can you confirm that the facts stated in your witness
 6 statement are true?
 7 A. Yes.
 8 MR. SHERBORNE: If you wait there, Ms. Wass will have some
 9 questions for you. Thank you.
 10 THE WITNESS: Thank you.
 11 MR. JUSTICE NICOL: Mr. Deuters, Ms. Wass represents the
 12 defendants in this action, and she is now going to ask you
 13 some questions.
 14 THE WITNESS: Thank you.
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1 DEUTERS
 2 CROSS-EXAMINED BY MS. WASS
 3 Q. Mr. Deuters, you have worked for Mr. Depp since 2004 in
 4 varying different roles; do you agree?
 5 A. Yes.
 6 Q. For a period of 16 years?
 7 A. Yes.
 8 Q. At the time of his relationship with Amber Heard, you were
 9 fulfilling the role of his personal assistant?
 10 A. Yes.
 11 Q. That was your job description?
 12 A. Yes.
 13 Q. You were dealing with his needs, professional and personal?
 14 A. Yes.
 15 Q. Do you agree that you were more than an employee, you were a
 16 friend?
 17 A. Yes, I suppose so.
 18 Q. And regarded almost as family?
 19 A. Yes.
 20 Q. And your loyalty to him has been rewarded, because you are now
 21 the European President of his production company?
 22 A. Right. Yes.
 23 Q. Sorry, I am asking, you need to say "yes" you agree or "no"
 24 you disagree.
 25 A. I got promoted to that position.

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1 DEUTERS - WASS
 2 Q. Your job description now is European President of Infinitem
 3 Nihil, which is Mr. Depp's production company?
 4 A. Yes.
 5 Q. You are financially dependent on Mr. Depp for your income?
 6 A. Yes.
 7 Q. You are dependent on the Johnny Depp brand for your future
 8 income?
 9 A. Yes.
 10 Q. If Mr. Depp or the brand is damaged professionally, you in
 11 turn are damaged financially?
 12 A. Yes.
 13 Q. Now, one of your duties as personal assistant to Mr. Depp over
 14 the years has been to assist him in obtaining controlled
 15 drugs; do you agree?
 16 A. No -- oh, controlled drugs -- sorry, as in prescribed
 17 medication?
 18 Q. No. Let me make myself clear. We have heard about a lot of
 19 types of drugs in this case, and I am going to try and make
 20 sure, and please if I have not made it clear, interrupt me in
 21 my question ----
 22 A. Yes.
 23 Q. ---- and ask me to do so. There are prescription drugs?
 24 A. Yes.
 25 Q. Which are what they say, they are prescribed by a doctor.

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1 DEUTERS - WASS
 2 A. Yes.
 3 Q. And Mr. Depp had a variety of prescription drugs that he took?
 4 A. Yes.
 5 Q. In addition to prescription drugs there are controlled drugs,
 6 recreational drugs, some might describe them, illegal drugs?
 7 A. Right.
 8 Q. Marijuana, cocaine, MDMA, Ecstasy?
 9 A. Right.
 10 Q. The list, I am sure I do not need to tell you the list. I am
 11 suggesting that you involved yourself in obtaining controlled
 12 drugs, illegal drugs, for Mr. Depp over the period when you
 13 were his personal assistant?
 14 A. No. I did not purchase drugs.
 15 Q. I am not asking you if you purchased them. I am asking you if
 16 you were involved in the arrangement of Mr. Depp being able to
 17 get hold of drugs?
 18 A. I am not sure I do understand.
 19 Q. You do not understand?
 20 A. No.
 21 Q. If Mr. Depp said, for example, "I am out of cocaine, I would
 22 like some cocaine", and there was somebody who was able to get
 23 the cocaine for him. And they said, "Well, I will give it to
 24 Mr. Deuters, and Mr. Deuters will give it to Mr. Depp". So,
 25 you were facilitating, I am giving you just an example now,

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1 DEUTERS - WASS
 2 you were facilitating the supply of controlled drugs. Now, is
 3 that a scenario you recognise or not?
 4 A. I mean, I was that on a very rare occurrence. That did not
 5 happen by any prevalence.
 6 MR. JUSTICE NICOL: Just a minute. Is it fair to make a note of
 7 your answer in these terms, that it did not happen often but
 8 on occasions it did?
 9 THE WITNESS: A very rare occasion.
 10 MS. WASS: I mean, you did so, knowing full well, I presume, that
 11 the supply or being involved in the supply of controlled drugs
 12 is against the law?
 13 THE WITNESS: Yes.
 14 MR. JUSTICE NICOL: Just a minute, please. (Pause) Yes.
 15 MS. WASS: You nonetheless did that because your loyalty was to
 16 Mr. Depp and to make sure he got what he wanted?
 17 THE WITNESS: Yes.
 18 Q. Yes. I mean, we have examples of you -- in fact, go to
 19 bundle 6, please. Let me explain the bundle system. On your
 20 left, the bundle with the red spine is bundle 6. If you can
 21 put bundle 2 away, otherwise we will get too many bundles.
 22 Bundle 6, the first tab says 119. Do you see that?
 23 A. Yes.
 24 Q. Open that tab and turn the file on its side, so you can read
 25 it in landscape. These are a series of texts between various

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1 DEUTERS - WASS
 2 different people over the years, 2012-2016, some of which are
 3 yours; all right?
 4 A. Right. Yes.
 5 Q. I am going to ask you to look at a couple of examples.
 6 Page 3, the bottom text.
 7 MR. JUSTICE NICOL: Just a moment. Do you see, Mr. Deuters, that
 8 at the bottom of each page, there is a large number beginning
 9 F697 ----
 10 THE WITNESS: Yes.
 11 Q. ---- and then there is a point?
 12 A. Yes.
 13 Q. And what Ms. Wass is asking you to look at is the one that
 14 says F697.3.
 15 A. Yes.
 16 MS. WASS: Now, if you look at, not the bottom text, but the one
 17 up from that.
 18 A. Yes.
 19 Q. If you look at the top, you can see a column marked "From"?
 20 A. Yes.
 21 Q. It is from Stephen Deuters.
 22 A. Yes.
 23 Q. To him, which is, I suggest, Mr. Depp, and it says: "Chasing
 24 ice, DVD and drugs".
 25 A. Yes.

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1 DEUTERS - WASS
 2 Q. Over the page, please, to page 5.
 3 A. Yes.
 4 Q. The fifth text down.
 5 A. Yes.
 6 Q. In fact, fourth text down, Mr. Depp, so he is called "him" in
 7 this these texts, to you: "Must procure many, many more from
 8 Joel, need them immediately now. It must be acquired,
 9 repackaged as vitamin gel caps and put on a fast course."
 10 A. Yes.
 11 MR. JUSTICE NICOL: Which are these texts, sorry?
 12 MS. WASS: Sorry, it is page 5 at the bottom and it is texts 4 and
 13 5. Those texts refer to Mr. Depp and controlled drugs, do you
 14 agree?
 15 A. No.
 16 Q. You do not?
 17 A. No.
 18 Q. Tell us what it was that needed to be repackaged as vitamin
 19 gel caps and put on a fast horse?
 20 A. In all likelihood, that would be the marijuana capsules,
 21 marijuna candies, that are legally obtained in Los Angeles,
 22 which Mr. Depp has a marijuana card for, because Joel ----
 23 MR. JUSTICE NICOL: Just slow down. Capsules of marijuana, which,
 24 in California, are legal.
 25 A. Yes. I am not too au fait with the terms, but THC or

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1 DEUTERS - WASS
 2 something. It is a legal -- and I know that on this one,
 3 because it says, "Many more from Joel". That is his business
 4 manager, Joel Mandel, who would assist because he had the
 5 official legal card.
 6 MS. WASS: It is right to say that Mr. Depp was very keen on
 7 marijuana as a recreational drug?
 8 A. Not for the first eight years I was with him.
 9 Q. I am talking about from 2000 and -- these dates are 2013?
 10 A. What is the date, sorry?
 11 Q. 2013.
 12 A. Right, yes.
 13 Q. He was very keen on marijuana from this stage onwards?
 14 A. Well, yes, I mean, he took it.
 15 Q. And not only marijuana, but he was also very keen on cocaine,
 16 do you agree?
 17 A. I do not know if I would use the word "keen", but ----
 18 Q. How would you describe his involvement with cocaine?
 19 A. I would say occasional usage.
 20 Q. Occasional usage?
 21 A. Yes.
 22 Q. Can you go to the back of file 6 and you will see a tab 148.
 23 There are lots of photographs with very long numbers. Sorry,
 24 148 is immediately behind the text? I think you might have
 25 gone too far.

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1 DEUTERS - WASS
 2 A. I have 148 at the back, it says.
 3 Q. They are all called 148 something or other, but it is just
 4 plain 148 that I am asking you to look at.
 5 A. Sorry.
 6 Q. It starts with a photograph of a bruised arm?
 7 A. Yes.
 8 Q. Go beyond the bruised arm to a picture of a bible?
 9 A. Yes.
 10 Q. With a credit card. Do you recognise that as Mr. Depp's
 11 credit card?
 12 A. I cannot say I do, no.
 13 Q. All right. There are two lines of what appears to be a white
 14 powder on that holy bible?
 15 A. Right. Yes.
 16 Q. And can you see, if you turn over the page, that there is some
 17 information about these photographs? About five lines down,
 18 it says, date, time, digitalised, 2013/6/22?
 19 A. Yes.
 20 Q. That would be, in the way the UK expresses a date, 22nd June
 21 2013?
 22 A. Yes.
 23 Q. And then do you see the next photograph along? Has my Lord
 24 got the new photographs that have been put in because ----
 25 MR. JUSTICE NICOL: Just a minute.

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1 DEUTERS - WASS
 2 MS. WASS: ---- the witness has both versions?
 3 MR. JUSTICE NICOL: Yes.
 4 MS. WASS: It is photograph F894.005. Have you got that,
 5 Mr. Deuters?
 6 A. Yes.
 7 Q. It is a photograph of Mr. Depp, clothed, wearing clothes,
 8 lying unconscious or asleep?
 9 A. Yes.
 10 Q. On the floor, with his head jammed into a bookcase?
 11 A. Yes.
 12 Q. We can see from that page, if you turn over -- in fact, you
 13 will have a worse quality one behind that?
 14 A. Yes.
 15 Q. And behind that we can just see 18/7/2013?
 16 A. Yes.
 17 Q. So that is the metadata for that photograph. Was this
 18 something that was quite a common occurrence that Mr. Depp
 19 would be in this sort of situation, appearing to have passed
 20 out?
 21 A. I would not say common, no. It was, again, witnessed on a
 22 rare occasion, but to me, when I look at that, it is quite
 23 distressing to me. I have not seen that often, no.
 24 Q. It is a distressing photograph?
 25 A. Yes.

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1 DEUTERS - WASS
 2 Q. Because he looks in a bad way, does he not?
 3 A. Yes.
 4 Q. You have explained cannabis, but whitey, or cocaine, was
 5 something that Mr. Depp did ask you to become involved with.
 6 Do you agree or not?
 7 A. Sorry, I do not really ----
 8 Q. Involved in supplying. He wanted to get hold of some cocaine
 9 and you would be involved in the supply chain, making sure he
 10 got it?
 11 A. Again, I suppose I go back to my first answer -- on very rare
 12 occasions.
 13 Q. Rare occasions, but you would do it? I think that is how you
 14 answered it before.
 15 A. On very rare occasions, yes.
 16 Q. Despite the fact that it is actually against the law?
 17 A. Yes.
 18 Q. In California as well, is it not?
 19 A. Yes.
 20 Q. Supplying cocaine?
 21 A. Yes.
 22 Q. And supplying Ecstasy would be the same; yes?
 23 A. Well, I mean, in California, I do not believe I was ever
 24 involved over there.
 25 MR. JUSTICE NICOL: Just a minute. (Pause)

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1 DEUTERS - WASS
 2 THE WITNESS: But, yes.
 3 MS. WASS: So, Ecstasy you do not believe you supplied in
 4 California; is that right?
 5 A. No.
 6 Q. But cocaine you did?
 7 A. I do not recall in California, no.
 8 Q. Right. In Australia, I think ----
 9 A. No.
 10 Q. No?
 11 A. No, not in Australia.
 12 MR. JUSTICE NICOL: Just a moment. (Pause) Was the question about
 13 Australia specific to a particular drug?
 14 MS. WASS: Yes, in Australia, I am going to suggest that in March
 15 2015, which we will come to in a little while because I want
 16 to deal with this chronologically, you were involved in
 17 passing drugs from Nathan Holmes, that Mr. Holmes had supplied
 18 to Mr. Depp, and you were the middle man, if you like?
 19 A. I do not recall an incident. I mean, it is perfectly
 20 possible. You know, sometimes I would go and see Johnny and I
 21 would have books or folders or whatever and I would go and
 22 pick up maybe post from the production office or someone would
 23 say, "Give this to Johnny", but I would not always be aware of
 24 the specifics.
 25 Q. You would not always be aware, but sometimes you were aware of

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1 DEUTERS - WASS
 2 specifics, were you not?
 3 A. Yes.
 4 Q. Again, that was part of your job; illegal, but part of your
 5 job; agreed?
 6 A. No, I am sorry, I do not recall ever being asked in Australia
 7 specifically. Specifically Australia, I never recall ever
 8 passing on any illegal substances, no.
 9 Q. Where do you recall passing on illegal substances?
 10 A. In the UK. That is probably the only time it has happened on,
 11 as I say, a rare occasion; the UK, I would say.
 12 Q. We will come to those incidents that you are referring to.
 13 Now, in May 2014 -- you have said that this was distressing,
 14 this photograph of Mr. Depp, because he is clearly in a bad
 15 way -- Mr. Depp decided that he needed to make an attempt at
 16 detoxification?
 17 A. I am sorry, what was the date?
 18 Q. May 2014?
 19 A. Right. Yes.
 20 Q. If I say the word "Kipper", does that ring bells?
 21 A. Yes.
 22 Q. This was by no means the first attempt that Mr. Depp had made
 23 to get clean from drugs, controlled drugs and alcohol, do you
 24 agree?
 25 A. I recall one occasion previous, yes.

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1 DEUTERS - WASS
 2 Q. There was one in 2011?
 3 A. Yes.
 4 Q. And then one in 2013, just after the Lone Ranger premier, or
 5 whatever it is called?
 6 A. I remember 2011. I remember 2014. 2013, I am not recalling
 7 at the moment, but he was sober during that period.
 8 Q. Very well. Let us stick with 2014 for the minute. What we
 9 have heard from Dr. Kipper is that he described Mr. Depp as a
 10 50 year-old male -- that was his age at the time -- "who has a
 11 lifelong history of self-medicating behaviours involving
 12 multiple substances of abuse. These include alcohol, opiates,
 13 benzodiazapines, and stimulants, cocaine." Does that accord
 14 with your understanding of Mr. Depp's state in May of 2014
 15 when he first was introduced to Dr. Kipper?
 16 A. There are a number of things that you read out there.
 17 Q. Shall I take them one by one so you can say whether you agree
 18 or not?
 19 A. Right, sure.
 20 Q. I have just read the passage out. I think you agree that he
 21 was a 50 year-old male at that stage?
 22 A. Yes.
 23 Q. "... who has a lifelong history of self-medicating
 24 behaviours"?
 25 A. Well, in the first eight years I was with him, I would contest

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1 DEUTERS - WASS
 2 that because I never saw anything.
 3 Q. You never saw anything for eight years? That would be until
 4 ----
 5 A. No, it was the summer of 2012.
 6 Q. 2012?
 7 A. Yes.
 8 Q. All right. I really want to ask you about between 2012 and
 9 2016, for obvious reasons?
 10 A. Yes.
 11 Q. Anyway, Dr. Kipper appears to have formed the view that it was
 12 lifelong history involving multiple substances of abuse; all
 13 right? I will list them for you, but do you agree that there
 14 were many substances of abuse that Mr. Depp was abusing?
 15 A. I mean, before my time I could not say, obviously, but at the
 16 time that you are asking, I only specifically recall one that
 17 was an issue, which he dealt with in the summer of 2014.
 18 I will recognise it when you say it for me.
 19 Q. Okay. Alcohol?
 20 A. I mean, he would drink, but I do not think -- that is not what
 21 he had to sort of quit at that period, no, but he drank, yes.
 22 Q. He drank?
 23 A. Yes.
 24 Q. And he drank a lot, and there would be periods when he stopped
 25 drinking altogether?

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1 DEUTERS - WASS
 2 A. Yes.
 3 Q. Because alcohol was a problem for him?
 4 MR. JUSTICE NICOL: Just a minute. Do you agree that he drank a
 5 lot?
 6 A. I suppose, I do not mean to be -- I mean, what is sort of a
 7 lot? Okay, he would not drink to the point where he ----
 8 Q. Did he get drunk?
 9 A. No. He had a remarkable ----
 10 Q. You say, no, he did not get drunk?
 11 A. I would say no, he was not, no, he did not get drunk. He
 12 would drink, but he would not get drunk, which was always
 13 remarkable, we thought remarkable.
 14 MR. SHERBORNE: Mr. Deuters, your voice dropped, sorry. Which was
 15 always, did you say remarkable?
 16 A. Remarkable. You know, he had a very strong constitution.
 17 MS. WASS: So are you saying that he actually drank or consumed a
 18 lot of alcohol that might make an average person drunk, but
 19 Mr. Depp could drink?
 20 A. Yes, I suppose that is fair.
 21 Q. Without appearing to get drunk?
 22 A. Yes, that is fair.
 23 Q. So his tolerance was very high?
 24 A. Yes. Yes.
 25 Q. And he was very keen on red wine, was he not?

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1 DEUTERS - WASS
 2 A. Yes, red wine.
 3 Q. He would drink or buy magnums of red wine rather than just the
 4 75 ----
 5 A. I would not say -- no, I do not recall magnums.
 6 Q. You do not recall him buying magnums?
 7 A. A regular bottle.
 8 Q. Only regular bottles are the only ones you have seen?
 9 A. Yes.
 10 Q. He had a problem with opiates?
 11 A. Yes. Opiates is what I recall at the time, yes.
 12 Q. And stimulants, that is to say, cocaine?
 13 A. I think that was very new at the time. So, I do not know, I
 14 do not know, I am probably not in the right position to say
 15 there was a problem. As I said, I remember it existing, but
 16 if it was a problem, I do not know. I do remember in 2014,
 17 the issue being the opiates and that is what he stopped taking
 18 that summer, yes.
 19 Q. Right. In May, towards the end of May, there was a flight
 20 that took place between New York, Boston and LA which I think
 21 you are aware of?
 22 A. Yes.
 23 Q. And you have made a witness statement about?
 24 A. Yes.
 25 Q. And on that flight were yourself, Jerry Judge, who was one of

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1 DEUTERS - WASS
 2 Mr. Depp's security?
 3 A. Yes.
 4 Q. Who is no longer with us, sadly, and Nathan Holmes, who was
 5 another assistant?
 6 A. I do not think he was on the plane.
 7 Q. You think not?
 8 A. No.
 9 Q. And when Mr. Depp boarded the plane, he was already drunk and
 10 under the influence of drugs, and by drugs, I mean controlled
 11 drugs, illegal drugs.
 12 A. Right.
 13 MR. JUSTICE NICOL: Well, Mr. Deuters, what Ms. Wass is doing is
 14 asking you questions and I need to make a note of your
 15 answers.
 16 A. Yes, of course.
 17 Q. So I need to know whether you agree or disagree with what she
 18 is saying.
 19 A. Yes, of course, your Honour.
 20 Q. So, do you agree or disagree that on this flight, when
 21 Mr. Depp boarded, he was already drunk?
 22 A. No, I would not say he was drunk. I do recall him being very
 23 low, very quiet, very introverted. I would not have witnessed
 24 any opiate usage, but it seemed like he was -- that drug would
 25 take you down to be sort of very low, very sort of, yes,

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1 DEUTERS - WASS
 2 introverted, almost immovable, focused. Almost your viewpoint
 3 becomes very myopic at that point. I remember him just being
 4 sort of, drawing or painting and, just sort of, yes, very
 5 quiet.
 6 Q. Very quiet?
 7 A. Mmm.
 8 MR. JUSTICE NICOL: The other part of Ms. Wass's last question was
 9 that he was also under the influence of cocaine. Do you agree
 10 or disagree with that?
 11 A. I do not think I agree. No, I do not agree with that, on that
 12 flight, that I recall, because cocaine has the opposite
 13 effect.
 14 MS. WASS: Yes, cocaine does not make you quiet, does it? It
 15 livens you up.
 16 A. Yes.
 17 Q. And indeed, well, so you are absolutely -- I mean, can you
 18 remember this incident clearly?
 19 A. To the best of my recollection, yes.
 20 Q. I presume you want to tell the truth about it?
 21 A. Yes.
 22 Q. Can you turn to the text schedule at the beginning of that
 23 bundle you have in your hand. Do you remember we looked at it
 24 beforehand?
 25 A. Yes.

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1 DEUTERS - WASS
 2 Q. And go to page 34 at the bottom. Do you have page 34?
 3 A. 34, yes.
 4 Q. I will just wait for the learned judge to get it.
 5 MR. JUSTICE NICOL: Yes.
 6 MS. WASS: This is a text sent by Mr. Depp to a friend of his,
 7 Paul Bettany, who I think you knew?
 8 A. Yes.
 9 Q. And it refers, as you will see in a minute, to the Boston
 10 plane journey that I am asking you about?
 11 A. Right.
 12 Q. "I'm going to properly stop the booze thing, darling. Drank
 13 all night before I picked Amber up to fly to LA this past
 14 Sunday." Do you agree that would accord with the dates
 15 because this was on the 30th and the flight was on the 24th?
 16 A. Right. I see, yes.
 17 Q. The flight to LA was with Amber, with Ms. Heard?
 18 A. Yes.
 19 Q. So Mr. Depp is saying, "I'm going to properly stop the booze
 20 thing, darling." So it appears, do you agree, that he was
 21 concerned about his alcohol intake?
 22 A. Yes.
 23 MR. JUSTICE NICOL: Just a moment.
 24 MS. WASS: "Drank all night before I picked Amber up to fly to LA
 25 this past Sunday." Then it goes on: "Ugly, mate, no food for

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1 DEUTERS - WASS
 2 days, powders", now, that is a reference to cocaine, is it
 3 not?
 4 A. I would suppose so, yes.
 5 MR. JUSTICE NICOL: Just a minute. (Pause)
 6 MS. WASS: "... half a bottle of whisky", we all know what that
 7 is, "a thousand Red Bull and vodkas", again very clear,
 8 "pills." What sort of pills do you think from that text? If
 9 you do not want to speculate then I do not ask you to say.
 10 A. Yes, I would only assume whatever medication he was on. I do
 11 not recall anything else.
 12 Q. But certainly something that caused a problem, I suggest, in
 13 the context of this text; do you agree?
 14 A. Yes.
 15 Q. So that is what Mr. Depp was saying he had consumed before the
 16 flight. Now, does that accord with the recollection of this
 17 quiet man sketching on his notebook?
 18 A. I mean, I suppose it suggests that it does not, but my
 19 recollection is honestly my own recollection. I am not really
 20 sure what you are ---
 21 MR. JUSTICE NICOL: Just a minute. It does not accord with your
 22 description of Mr. Depp sketching in his notebook. Does it
 23 make you think whether your recollection is accurate?
 24 A. Yes, of course it would, but I still stand by -- I have my
 25 recollection. I believe in it, yes.

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1 DEUTERS - WASS
 2 MS. WASS: So this has not caused you to question whether your
 3 recollection is accurate or not?
 4 A. No. No.
 5 Q. All right. Then let us finish the rest of that text, please:
 6 "Two bottles of champers on the plane", now that is champagne?
 7 A. Right, yes.
 8 Q. Did you remember him drinking two bottles of champagne?
 9 A. I do not remember two bottles, but I am sure there was -- I do
 10 remember, yes, a glass on the table.
 11 Q. Yes, but this was not just a glass; it was two bottles?
 12 A. Yes. I cannot say that I remember two bottles of champagne.
 13 Q. You do not remember him swigging? I do not mean from the
 14 bottle, but downing two bottles of champagne?
 15 A. It is possible, but I do not specifically recall it, no.
 16 Q. "What do you get", reads on the text, "an angry aggro injun
 17 a fucking blackout, screaming obscenities and insulting any
 18 fuck who got near." I mean, that does not accord with your
 19 description of Mr. Depp, quietly sketching in a notebook?
 20 A. No.
 21 Q. He appears to be saying that he was "in a fucking blackout",
 22 to use his words?
 23 A. Yes.
 24 Q. Was he in a blackout?
 25 A. I do not really know what a blackout is.

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1 DEUTERS - WASS
 2 Q. It is when you become unconscious?
 3 A. Oh, no. I mean, no. I would not say that he was in an
 4 unconscious state, no, not that I recall.
 5 Q. You are right to ask about blackout, but it can also mean that
 6 you simply do not remember whole events?
 7 A. Right.
 8 Q. Did he appear, from what happened between you and him, to have
 9 forgotten swathes of that plane journey?
 10 A. I mean, the conversation that we had the following day, yes,
 11 that is in accordance. The memory was not, you know, solid
 12 all the way, yes.
 13 Q. So the memory was not solid all the way through. You are
 14 saying he was not unconscious at any stage?
 15 A. No, I do not recall that, no, certainly not.
 16 Q. Which suggests that the consumption of all of this stuff
 17 caused him to have a lapse of memory or that type of blackout;
 18 yes?
 19 A. Yes.
 20 Q. Screaming obscenities?
 21 A. I do not recall.
 22 Q. I mean, is this something you are likely to forget?
 23 A. No, I would remember that.
 24 Q. Yes.
 25 MR. JUSTICE NICOL: Just a minute. (Pause) So you say from that

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1 DEUTERS - WASS
 2 trip, he was not, Mr. Depp was not screaming obscenities?
 3 THE WITNESS: I certainly do not recall any obscenities being
 4 screamed, no.
 5 MR. JUSTICE NICOL: Thank you.
 6 MS. WASS: And "insulting any fuck who got near"?
 7 THE WITNESS: Again, I mean, I have to paint the picture of where
 8 we were on the plane. Myself, Jerry were sat towards the
 9 galley, so at the front of the plane. There is another set of
 10 chairs in front of us. Keenan Wyatt was on one of them,
 11 I think the other was empty. Where Johnny and Amber would
 12 always sit, really, there is a table in the middle of the
 13 plane, so there is a bit of a gap. So, it is loud on those
 14 planes, so you cannot hear. For example, if someone is, where
 15 Johnny was sat in the chair and where I was sat, there is no
 16 conversation to be had. I can see him clearly, but I would
 17 not be able to hear, if there was, if something was being
 18 shouted, I would not be able to hear. Obviously I would be
 19 able to see it, but I would not be able to hear it.
 20 Q. Did you see he was very aggressive and shouting at Ms. Heard?
 21 A. I do not recall it like that, no.
 22 MR. JUSTICE NICOL: Just a minute. Thank you.
 23 MS. WASS: He was calling her a go-getter slut and whore.
 24 THE WITNESS: Again, I mean, if those words were uttered I would
 25 not have heard them.

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1 DEUTERS - WASS
 2 Q. That is the sort of language that Mr. Depp would use, is it
 3 not, to describe women?
 4 A. No.
 5 Q. No?
 6 A. No. I mean, no.
 7 Q. You are quite sure about that?
 8 A. Yes.
 9 Q. He would never use offensive language to describe women; is
 10 that what you are saying?
 11 A. Yes. I would not say that he would. I mean, no.
 12 MR. JUSTICE NICOL: Just a minute.
 13 THE WITNESS: That was not the standard ----
 14 MR. JUSTICE NICOL: Just a minute, please. (Pause)
 15 MS. WASS: Have you ever heard him describe a woman as a slut.
 16 THE WITNESS: I could not recollect.
 17 Q. Whore?
 18 A. I am sorry.
 19 Q. Whore?
 20 A. No.
 21 Q. Cunt?
 22 A. No.
 23 Q. Never?
 24 A. Well ----
 25 Q. You winced when I said the word?

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1 DEUTERS - WASS
 2 A. I have no recollection of it. I could not point you to a
 3 specific ----
 4 Q. Let me try and test your recollection a little further, if
 5 I may. Mr. Depp was screaming obscenities in the way that is
 6 described in his text to Mr. Bettany, and the obscenities were
 7 that Ms. Heard was a slut and a whore, and he suggested that
 8 she wanted to get fucked, those are his words, with James
 9 Franco. Do you know who James Franco is?
 10 A. Yes.
 11 Q. You know why he was relevant at the time?
 12 A. I believe he was performing in a movie with Ms. Heard.
 13 Q. Yes. Now, does that jog your memory at all, that scene of
 14 Mr. Depp shouting obscenities at Ms. Heard in the terms that
 15 I have said?
 16 A. No.
 17 Q. No?
 18 A. No. I mean, no, because where we were sat, where we could
 19 see, he was sort of doing his thing and there was clearly, you
 20 know, they were, there was clearly talking going on between
 21 them. That was apparent. But it did not seem to be, it did
 22 not seem to be sort of like a screaming obscenities slanging
 23 match. There was clearly an argument of sorts.
 24 Q. There was an argument?
 25 A. Well, you know, you could see she was being -- body language

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1 DEUTERS - WASS
 2 from her, whereas, and he very introverted, you know, very
 3 little body language, I recall that.
 4 Q. So, forgive me, are you suggesting that she was the animated
 5 one and he was the quiet one?
 6 A. Yes, certainly.
 7 Q. Can you help us with any reason you know of why he would be
 8 describing himself as screaming obscenities and insulting any
 9 fuck who got near in his text with Paul Bettany in those
 10 circumstances?
 11 A. I could not. No, I could not, otherwise, you know, maybe he
 12 had forgotten exactly how it went down. I am used to him sort
 13 of speaking down about himself invariably. You know, making
 14 sometimes things worse than they are, maybe it is that. Sorry
 15 that, is me assuming that. I do not know.
 16 Q. You see, Ms. Heard was not the aggressive one on this
 17 occasion; it was Mr. Depp, and Ms. Heard moved seats several
 18 times to try and get away from him?
 19 A. I do not recall. I remember her moving away once and standing
 20 up, I remember that. I do not remember the several seats.
 21 MR. JUSTICE NICOL: Just a moment. (Pause) Yes.
 22 MS. WASS: Do you remember her standing up once, turning her back
 23 to Mr. Depp, as she was trying to move away from him?
 24 THE WITNESS: Yes. I think she turned sort of to her side.
 25 Q. And he kicked her in the back?

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1 DEUTERS - WASS
 2 A. No. She turned to her side.
 3 Q. Did you ever see Mr. Depp kick Ms. Heard in the back?
 4 A. I did not.
 5 Q. Did you see any contact between Ms. Heard's back and
 6 Mr. Depp's foot?
 7 A. There was, yes, I do recall a raised foot or a raised leg ----
 8 Q. Whose leg, sorry, just before you carry on?
 9 A. Mr. Depp's leg.
 10 Q. Mr. Depp's leg was raised?
 11 A. Yes.
 12 Q. And what did he do with his leg once it was raised?
 13 A. Well, to sort of, to describe it, because it was quite a feat
 14 for anybody, really. Where he was sat on the plane table
 15 here, there is a window here, the table used to, you would
 16 fold it in order to create more room and that particular seat,
 17 those two particular seats, it sort of almost cements you into
 18 the plane, you almost do not need to use a seat belt. So, he
 19 was a bit rigid there. I remember books on the table. I am
 20 sure there was a champagne glass. There was always an
 21 ashtray, heavy thing. I think, I think there were bags
 22 probably under the table, but there definitely these thick
 23 table legs. So, you are sort of quite rigid in that position.
 24 So, it would sort of take quite the gymnastic feat to
 25 manoeuvre the little bit, the leg was slowly raised. I recall

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1 DEUTERS - WASS
 2 that, yes.
 3 Q. His leg was slowly raised, and aimed towards the back of
 4 Ms. Heard?
 5 A. Back or bottom.
 6 Q. You said in your statement, Mr. Depp made a playful attempt to
 7 tap her on the bottom with his shoe?
 8 A. Yes, that is right.
 9 Q. That is in your statement?
 10 A. Yes.
 11 Q. Is that your recollection?
 12 A. Yes. That was how I would see it.
 13 Q. I suggest this was not a playful attempt. This was a proper
 14 kick to her back, an assault, and you saw that?
 15 A. No. I did not see that.
 16 Q. You saw him hit her in the back?
 17 A. No.
 18 Q. As she was trying to get away from him?
 19 A. No. No. She was just standing there.
 20 Q. And Mr. Depp on that flight was behaving like a monster?
 21 A. A monster? No. No no. He was very quiet. I could tell
 22 there was, he had probably the opiates because it was right
 23 before he kicked them, I remember marijuana, champagne
 24 obviously as he says, and those things, invariably, they make
 25 someone very sort of low and small.

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<p>1 DEUTERS - WASS</p> <p>2 Q. You have forgotten the powders that he mentioned?</p> <p>3 A. Yes, I did not witness, so I could not say. I certainly do</p> <p>4 not recall powders on the plane.</p> <p>5 Q. Did Mr. Depp eventually go into the bathroom?</p> <p>6 A. Yes.</p> <p>7 Q. And what sort of condition was he in when he went to the</p> <p>8 bathroom?</p> <p>9 A. I do not think he was great. He was sort of, you know --</p> <p>10 I remember sitting with him for a minute and he was rather</p> <p>11 sort of really quite sad, quite low, and he just sort of did</p> <p>12 not really want to talk and just wanted to ----</p> <p>13 Q. Was he able to talk?</p> <p>14 A. Yes. I remember sitting with him for a minute. I do not</p> <p>15 recall the specifics of the conversation, but I do not think</p> <p>16 he wanted to talk. He just wanted to sort of go and be by</p> <p>17 himself, which happened on occasions.</p> <p>18 Q. I am going ask you to listen to a recording, please. My Lord,</p> <p>19 we listened to this before, and there was a problem finding</p> <p>20 the transcript. I now have located them. Can you go to</p> <p>21 file 4, Mr. Deuters.</p> <p>22 MR. JUSTICE NICOL: Which tab, please?</p> <p>23 MS. WASS: Tab 148J(ii). (To the witness) Let us try file 4 to</p> <p>24 start with. Mr. Sherborne says they might be in another file.</p> <p>25 (Pause).</p>	<p>1 DEUTERS - WASS</p> <p>2 Mr. Deuters, I am going to ask you to listen to the</p> <p>3 recording and then I am going ask you a few questions; all</p> <p>4 right?</p> <p>5 THE WITNESS: Yes.</p> <p>6 (The recording played to the court)</p> <p>7 MS. WASS: Just before we carry on, can you hear the noise of the</p> <p>8 plane?</p> <p>9 THE WITNESS: Yes.</p> <p>10 Q. Over the sound of Mr. Depp moaning?</p> <p>11 A. Yes.</p> <p>12 Q. You can hear that?</p> <p>13 A. Yes, it is a noise, yes.</p> <p>14 Q. It is the noise of an airplane?</p> <p>15 A. Right, okay.</p> <p>16 Q. Carry on, please.</p> <p>17 MR. SHERBORNE: There is a dispute about whether this is on the</p> <p>18 plane, and if there is going to be a question asked about it,</p> <p>19 I do not want to have a trial within a trial about what this</p> <p>20 recording refers to, but your Lordship will know we do not</p> <p>21 accept that it is necessarily on the plane.</p> <p>22 MS. WASS: Let us listen to the rest of the recording,</p> <p>23 Mr. Deuters.</p> <p>24 (The recording continues)</p> <p>25 MS. WASS: Did you follow that, Mr. Deuters, on the transcript?</p>
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<p>1 DEUTERS - WASS</p> <p>2 MR. SHERBORNE: It is in my file 5.</p> <p>3 THE WITNESS: Sorry, 148?</p> <p>4 MS. WASS: No, sorry -- yes, 148J(ii).</p> <p>5 A. Right. Yes.</p> <p>6 Q. Have you got that? It should start with the word "Johnny",</p> <p>7 the first page will say, "Tape recording of the claimant and</p> <p>8 Ms. Heard", do you see that?</p> <p>9 A. I have 148J(i), with a transcript and then ----</p> <p>10 Q. I am asking you to look at (ii).</p> <p>11 A. There is nothing in there.</p> <p>12 MS. WASS: Has my Lord got (ii)?</p> <p>13 MR. JUSTICE NICOL: I do, yes.</p> <p>14 MS. WASS: The bottom of my Lord's page should be F894.264.</p> <p>15 MR. SHERBORNE: There are two versions, my Lord. One is the</p> <p>16 claimant's transcript and the other is the defendants'.</p> <p>17 MS. WASS: I am going to ask my Lord to listen to the defendants'</p> <p>18 transcript and then make your Lordship's mind up as to whether</p> <p>19 it is says what it says on this.</p> <p>20 MR. JUSTICE NICOL: So, this is the defendants' transcript?</p> <p>21 MS. WASS: Yes, this is the defendants' transcript. What I am</p> <p>22 doing to do, my Lord, is play the beginning and then there is</p> <p>23 a period of silence, and it is at that stage, when the</p> <p>24 conversation takes place. We did not listen to the</p> <p>25 conversation that was later.</p>	<p>1 DEUTERS - WASS</p> <p>2 THE WITNESS: Perhaps I did not quite -- I mean.</p> <p>3 MS. WASS: We can play it again, if you like.</p> <p>4 MR. JUSTICE NICOL: Ms. Wass, the quality of the recording is not</p> <p>5 great.</p> <p>6 MS. WASS: I agree.</p> <p>7 MR. JUSTICE NICOL: If there is a question that you want to ask</p> <p>8 the witness, then do. But I do not think we are going to play</p> <p>9 it again.</p> <p>10 MS. WASS: Mr. Deuters, that was your voice saying the words "We</p> <p>11 have an hour, under 50 minutes".</p> <p>12 A. I did not -- sorry, I could not hear it to confirm whether</p> <p>13 that was my voice or not.</p> <p>14 Q. You also said the words, "No, I'm going to stay with this</p> <p>15 fucking idiot in case he gets sick"?</p> <p>16 A. Not the kind of language I use.</p> <p>17 MS. WASS: My Lord, on Friday, Mr. Sherborne passed up a document</p> <p>18 which I suggested was incomplete, and I am going to pass up</p> <p>19 now the second page of it. It was a screenshot from the</p> <p>20 metadata of this. The screenshot, had the metadata been</p> <p>21 scrolled down the full picture would have emerged.</p> <p>22 (To the witness) Do you agree that the Boston plane incident</p> <p>23 was on 24th May or do you have to look at records?</p> <p>24 A. No. I think that sounds correct. Yes.</p> <p>25 Q. But then you have heard that those noises, which I am going to</p>

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1 DEUTERS - WASS
 2 suggest were Mr. Depp, does that sound ----
 3 MR. SHERBORNE: My Lord, before Ms. Wass proceeds, if she is going
 4 to rely on what she handed up, it is only right, and this
 5 witness, with the greatest respect, should not be used as a
 6 vehicle for this, pardon the pun. Your Lordship should find,
 7 actually, behind tab 148J(iii), just behind the claimant and
 8 defendants' version of the transcript, you will find pages
 9 showing, these are screen shots showing how -- and I did not
 10 get a chance to introduce this. I thought, given what
 11 I understood was said to us over the weekend, this was going
 12 to be raised before your Lordship, as opposed to with a
 13 witness. If you will see, if you start on F894.265, does your
 14 Lordship see that 2014 is in blue and, if you turn over the
 15 page, you will see another screenshot, where one of Schillings
 16 has been able to enter the metadata section. You will see on
 17 that screenshot the highlighted 2014. Then on the third page,
 18 267, you can see it is readily possible to change that date
 19 from "2014" to "2019". Then you will see a similar exercise
 20 on 268, to do with the length. Then, if you keep looking
 21 through those photos, 271, you can change when it says the
 22 medium was created as well. It does not have to be a
 23 technician at Microsoft to do this. You will see 272 and 273
 24 there is a drop-down menu which shows you how to change the
 25 date when the media was created. It shows you the simplicity

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1 DEUTERS - WASS
 2 with which this was done. There are further screenshots to
 3 show how easy it is to move this around.
 4 So, my Lord, the reason we are showing you this is that
 5 the metadata does not establish anything. I am slightly
 6 surprised that this is the vehicle, pardon the pun, through
 7 which Ms. Wass is attempting to introduce this. It is one
 8 thing to ask Mr. Deuters whether he can recognise this as a
 9 flight, let alone this particular flight. It is another to
 10 put to him, as she does, that we know that this was a
 11 recording of the Boston flight. One really needs to establish
 12 these things properly through witnesses, as opposed to
 13 producing pages which can easily be changed.
 14 MR. JUSTICE NICOL: Well, we are in the middle of Ms. Wass's
 15 cross-examination. Ms. Wass, if there is an issue about the
 16 documents that you are asking the witness to look at, then we
 17 will need to deal with that in some other way.
 18 MS. WASS: I entirely agree. The proper time is not now. I will
 19 continue, unless there is an objection, asking the witness
 20 about the events of the flight.
 21 MR. JUSTICE NICOL: Well, by all means ask him about the flight,
 22 if there are other questions that you want to raise, but
 23 I think we need to move on from the document behind
 24 16148J(iii).
 25 MS. WASS: Yes. Mr. Deuters, having heard the recording and we

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1 DEUTERS - WASS
 2 have heard it, would you agree there is a lot of background
 3 noise on that recording?
 4 THE WITNESS: Yes.
 5 Q. Would you agree that is consistent with the noise that one
 6 hears on an airplane?
 7 A. Yes.
 8 Q. Are you able to say whether that is Mr. Depp's voice making
 9 those sounds, having known him and worked with him for
 10 16 years?
 11 A. It sounds like it, yes.
 12 Q. Again, as far as the voices at the end of the sound, I think
 13 you cannot recognise them. Did you hear some male speaking?
 14 A. Yes.
 15 Q. At the end?
 16 A. Yes, there was other ----
 17 Q. There was a male speaking?
 18 A. Yes, I could not ----
 19 Q. I think there was female as well, but there were -- all right.
 20 A. I could not decipher the voices.
 21 Q. Have you ever known Mr. Depp pass out on an airplane, ever?
 22 A. Pass out? I mean, sleep?
 23 Q. No. Pass out through intoxication?
 24 A. I do not, I generally do not recall a sort of passing out
 25 through intoxication, no.

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1 DEUTERS - WASS
 2 Q. You see, I am going to ask but something at file 8, tab 64, to
 3 see whether you are able to help us with a description.
 4 MR. JUSTICE NICOL: Just a moment. (Pause) It is probably
 5 helpful, Mr. Deuters, if you put away the files after we have
 6 been discussing them.
 7 THE WITNESS: Sorry, file 8?
 8 MS. WASS: File 8, tab 64.
 9 MR. SHERBORNE: My Lord, again, this is another document we raised
 10 last time, it is Ms. Heard writing to Ms. Heard. It is
 11 nothing to do with Mr. Deuters. If it is going to be used as
 12 a vehicle to try and introduce a question, the question can
 13 just be asked without using this as a vehicle. Your Lordship
 14 knows why I say it.
 15 MR. JUSTICE NICOL: Well, Mr. Sherborne, I am going to let
 16 Ms. Wass ask her question. If you consider that the question
 17 is improper, once it has been asked, then you can raise the
 18 objection.
 19 MR. SHERBORNE: Yes. It does depend on how much of this is read
 20 out again by Ms. Wass.
 21 MS. WASS: Mr. Deuters, just so that you know what you are looking
 22 at, this is an e-mail from Ms. Heard to herself, dated
 23 11th June 2013.
 24 A. Sorry, what tab in the file, sorry?
 25 Q. So sorry. 64. This was almost a year before the Boston plane

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1 DEUTERS - WASS
 2 incident.
 3 A. Right. 64A?
 4 Q. No, 64 plain.
 5 A. Yes.
 6 Q. Do you see that is an e-mail from Ms. Heard to Ms. Heard dated
 7 11th June 2013?
 8 A. Yes.
 9 Q. At 6.06 p.m.?
 10 A. Yes.
 11 Q. Do you see the two hole punches, if you go to the middle of
 12 the two hole punches, there is a line that begins with the
 13 word "Bottom".
 14 A. Yes.
 15 Q. Then, I want to ask you about this description, please. This
 16 is an e-mail that is written as if to Mr. Depp, but not sent
 17 to him; all right?
 18 A. Right. Yes.
 19 Q. "Yesterday I saw you pass out amongst vomiting three times.
 20 All three times Jerry had carried you from the floor on the
 21 plane ...(reads to the words)... if someone would have been
 22 honest enough to tell you, to show you." Is that a
 23 description that you recognise of Mr. Depp's behaviour?
 24 A. I mean, no, it sounds like an embellishment, certainly. Carry
 25 from the floor? I am not sure what that means. Break into

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1 DEUTERS - WASS
 2 locked doors? Again, I do not recall:
 3 Q. Let us go a bit back before the carrying. Passing out, have
 4 you seen him pass out?
 5 A. Yes. I have, yes. I do not recall specifically. One memory
 6 comes to mind in 2011, in a trailer, after a long day of
 7 filming, yes.
 8 Q. Vomiting?
 9 A. Yes. I think maybe once or twice, yes. Again, not a common
 10 thing. I do not, I certainly do not remember that on the
 11 plane.
 12 Q. Jerry Judge having to carry him from the floor on a plane?
 13 A. I do not have any recollection of that.
 14 Q. "Nathan", that is Nathan Holmes, "having to break into locked
 15 doors to wake you up after passing out on the toilet"?
 16 A. I cannot speak to any specific occasion I recall.
 17 Q. You have never known Mr. Depp having to be, one of the staff
 18 breaking into the toilet because Mr. Depp has passed out?
 19 A. No. I genuinely do not recall now.
 20 Q. On the Boston plane flight that you are giving evidence about,
 21 once the flight had landed, do you agree that Ms. Heard and
 22 Mr. Depp separated, they went their separate ways?
 23 A. I believe so, but I cannot remember specifically, but I,
 24 I have a vague memory, yes, that Ms. Heard travelled to
 25 wherever she travelled to and we took Mr. Depp home, yes.

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1 DEUTERS - WASS
 2 Q. And you updated Ms. Heard with Mr. Depp's progress; do you
 3 agree?
 4 A. Yes.
 5 Q. If you go to the beginning of 6 -- sorry, if you put that file
 6 away.
 7 A. Yes.
 8 Q. It is the text schedule at the beginning, so behind 119, it is
 9 the document in landscape we are looking at.
 10 A. Sorry. (Pause)
 11 Q. A text schedule, you can go to page 28, please. Have you got
 12 that?
 13 A. Yes.
 14 Q. If you go to the bottom three lines, they are texts dated
 15 24th May, so the date of the plane incident, to Ms. Heard.
 16 A. Yes.
 17 Q. Obviously you would not have texted her until after you had
 18 separated from Ms. Heard; do you agree?
 19 A. Yes.
 20 Q. So, we can presume you separated from her and you said this:
 21 "He's up in the bathroom. Moving slowly. Will let you know
 22 when en route and how he is in the car." Looking at that,
 23 does it appear you have got in the car yet, because you are
 24 going to tell her how he is in the car, and suggesting that he
 25 may well still be on the plane, or you and he may still be on

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1 DEUTERS - WASS
 2 the plane, even though she has left?
 3 A. Oh, right. Yes. I mean, obviously we are not in the car,
 4 obviously, and I -- yes.
 5 Q. When I am suggesting the order in which they happen, just so
 6 that you are clear. The plane landed obviously before anybody
 7 got off. Ms. Heard got off and went her separate ways. You
 8 and Mr. Depp remained in the plane for a little while. Now,
 9 is that consistent with the text that you send Ms. Heard:
 10 "He's up, in the bathroom. Moving slowly. Will let you know
 11 when en route." Yes?
 12 A. Yes.
 13 Q. We know Mr. Depp was in the bathroom in the plane, was he not?
 14 He went to the bathroom.
 15 A. Yes.
 16 Q. And in fact remained in the bathroom for an appreciable part
 17 of the ----
 18 A. Yes.
 19 Q. You then go on to say: "He is in some pain as you might
 20 guess." What pain are you saying he might be in this text to
 21 Ms. Heard?
 22 A. Well, I mean, I mean, to the best of my recollection,
 23 I suppose, yes, if he went to the bathroom and then fell
 24 asleep, potentially he is hungover.
 25 MR. JUSTICE NICOL: Just a minute. (Pause)

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1 DEUTERS - WASS
 2 THE WITNESS: Or sort of -- (Pause)
 3 MR. JUSTICE NICOL: Yes.
 4 A. Or potentially, I mean, I recall sometimes he would be, before
 5 he stopped using opiates, it would affect his sort of stomach.
 6 MS. WASS: You thought he had tummy ache, did you?
 7 A. You know, of that ilk. It could cause quite unpleasant
 8 feeling in that area. It could be that. I do not know
 9 specifically. I could not say specifically.
 10 Q. We are on our way to 80, that is 80 Sweetzer Avenue, is that
 11 right, where he had a property in Hollywood?
 12 A. Yes.
 13 Q. Over the page, you carry on: "He has been sick. We are going
 14 to get him straight to bed?"
 15 A. Yes.
 16 Q. Is that just tummy ache?
 17 A. I mean, I cannot recall specifically.
 18 Q. Or do you think, having seen what he said he had drunk and
 19 imbibed by way of controlled drugs, he might have just
 20 overdone it, and that is what made him ill?
 21 A. It is possible, yes.
 22 Q. That is possible as well?
 23 MR. JUSTICE NICOL: Just a minute. (Pause) By "overdone it", do
 24 you mean that he was drunk?
 25 A. The behaviour was not the behaviour of a drunkard, but

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1 DEUTERS - WASS
 2 nevertheless, the consumption, as you said, because of the
 3 consumption, it could be, you know, quite impressive, if you
 4 will, and it could be a cause of that, yes. So, not
 5 necessarily behavioural but physical, yes.
 6 MS. WASS: As you said, "He's sound asleep. We are here looking
 7 out for him".
 8 A. Yes.
 9 Q. Have you got that at the top of 29?
 10 A. Yes.
 11 Q. Can you keep that file open. I am sorry if this is going to
 12 be a bit tricky having all these documents open ----
 13 A. No worries.
 14 Q. ---- and go to file 8. It is tab 71B.
 15 A. Yes.
 16 Q. This is another e-mail from Ms. Heard to herself, but dated
 17 25th May 2014 at 11.32 p.m; all right?
 18 A. Yes.
 19 Q. That is what the date is recorded as?
 20 A. Yes.
 21 Q. It reads as follows, and I am going to ask you about whether
 22 you recognise the events that she is describing in case
 23 Mr. Sherborne wants to know where I am going with this?
 24 A. Yes.
 25 Q. "If he doesn't know how scared I am, must be, then I have

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1 DEUTERS - WASS
 2 overestimated him, which I don't think I have, but maybe you
 3 are right. He should know because he should love me and know
 4 if anyone did this to you or Lily-Rose, he'd fucking kill
 5 them. He needs to be accountable and aware enough to know
 6 that, to know how much I've been put through and how scared I
 7 must be. I've given him a thousand sorrys and a thousand
 8 chances and couldn't have been more supportive throughout.
 9 I'm not going to live my future like this. I can sit back and
 10 be there when he finally kills himself. Insanity is doing the
 11 same thing over and over and expecting different results.
 12 That's what I'm doing by staying in his life. I have nothing
 13 left to say. He doesn't have the impetus to fix this, to fix
 14 us, then it wasn't important enough to him. Bottom line, I
 15 have done all the fixing, all the carrying, all the putting my
 16 faith into him being disappointed and lied to over and over.
 17 Now its time for him to do the caring. He needs to care for
 18 himself. He needs to fix us, fix this, not me. If I fix it
 19 again, it will happen again and I'm done. If he seems
 20 confused, feel free to explain to him or don't. I'm not sure
 21 it matters at this point. I need time and space to recover.
 22 The man I love and want to marry called me an embarrassment
 23 and a whore amongst other things in front of a plane full of
 24 people who did nothing before kicking me, kicking me in the
 25 back and then mocked me for crying about it immediately

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1 DEUTERS - WASS
 2 after."
 3 Do you recognise that description of Mr. Depp's
 4 behaviour on the plane?
 5 A. You mean, with regard to the last two lines, you mean?
 6 Q. Yes, exactly.
 7 A. No, I do not.
 8 Q. As far as you are concerned, she was never referred to as a
 9 whore, amongst other things, and she was never kicked in the
 10 back or kicked at all, if you are telling the truth?
 11 A. No.
 12 MR. JUSTICE NICOL: Never referred to as a whore. You say that
 13 that did not happen.
 14 A. Correct, it did not happen, yes.
 15 Q. And never kicked in the back?
 16 A. No.
 17 MS. WASS: Or kicked at all, I think the witness said. Would you
 18 go back to the text schedule in bundle 6. You can put that
 19 file away. You should have page 29 open on the text schedule.
 20 Is that the one you are looking at?
 21 A. Yes.
 22 Q. If you go three from the bottom, please?
 23 A. On 29?
 24 Q. On 29, three from the bottom, there are two texts from you to
 25 Ms. Heard, which I am going to ask for your help with?

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1 DEUTERS - WASS
 2 A. Yes.
 3 Q. "Hey, he's up, he's much better, clearer, he doesn't remember
 4 much." Do you remember Mr. Depp had a very partial memory of
 5 the events on the plane?
 6 A. Yes, right. Yes.
 7 Q. Does that accord with your recollection of him the next day,
 8 not remembering the events?
 9 A. Well, it would fit with that note, those words in the text,
 10 yes.
 11 Q. And there is no point in you saying that to Ms. Heard unless
 12 it was correct?
 13 A. Yes.
 14 Q. "He is up, he's much better, clearer. He doesn't remember
 15 much, but we took him all through that happened." Did you
 16 have to say to Mr. Depp, "Look, you may not remember this, but
 17 you did X, Y and Z"?
 18 A. I mean, yes, that suggests, yes, we updated him on the events
 19 of the evening, if he wasn't -- yes, if he couldn't remember
 20 everything, yes.
 21 Q. So you told him what had happened?
 22 A. Yes.
 23 Q. Which he could not remember?
 24 A. Yes.
 25 Q. "He's sorry, very sorry." What was he sorry about, if your

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1 DEUTERS - WASS
 2 account is true?
 3 A. I mean, I suppose the argument that they had, any conflict
 4 that they had, he was sorry for that. He was often, you know,
 5 if there was a conflict, yes.
 6 Q. "And he just wants to get better"?
 7 A. Yes.
 8 Q. What was wrong with him; this indigestion you are talking
 9 about?
 10 A. Probably more with respect to the opiates, I would think.
 11 Q. Yes, exactly.
 12 MR. JUSTICE NICOL: Just a minute. Yes.
 13 MS. WASS: So by saying he wants to get better, we are not talking
 14 about tummy ache, we are talking about the opiates and the
 15 drug and alcohol consumption; do you agree?
 16 A. Yes, I would think so, opiates in particular then, yes.
 17 MR. JUSTICE NICOL: What about the alcohol consumption?
 18 A. I do not remember it, at that point, being an issue whereby,
 19 like, rehab or something like that was necessary. I remember
 20 there being the alcohol consumption, but I remember us being
 21 concerned with the opiate, which we wanted to deal with, yes.
 22 MS. WASS: Were you also concerned with the cocaine?
 23 A. I do not recall being concerned about cocaine at that stage,
 24 no.
 25 Q. You said, "He just wants to get better, which allows us to

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1 DEUTERS - WASS
 2 make him follow up on that promise"; do you see that?
 3 A. Yes.
 4 Q. Mr. Depp was saying, "I'm going to get better"?
 5 A. Yes.
 6 Q. That is why he went to see Dr. Kipper, was it not?
 7 A. Yes.
 8 Q. You carry on in the next text, "He's teary"?
 9 A. Yes.
 10 Q. "He doesn't want to be a fuck up any more, his words." Were
 11 those his words to you?
 12 A. I mean, yes. I would not have described him as that, so he
 13 would have said that to me ----
 14 Q. All right.
 15 A. ---- hence me saying that ----
 16 Q. What if -- forgive me, I interrupted you. Carry on.
 17 A. No, yes, the fact that I say "his words", yes, that is the
 18 line he would have said to me, yes.
 19 Q. So, when he said to you, "I don't want to be a fuck-up any
 20 more", what did you understand he was talking about?
 21 A. That he wanted to get better with regards to, at this stage,
 22 most specifically his addiction to opiates.
 23 Q. It was his addiction generally, was it not, not just to
 24 opiates?
 25 A. I mean, yes, I do not know if I can say anything to that. I

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1 DEUTERS - WASS
 2 mean, I just remember our concern around that time was very
 3 specifically the opiates at this time. That was our worry and
 4 that is what we were wanting to help with, yes.
 5 Q. It says, "He has got bad indigestion this morning, but
 6 otherwise all right. He's gone back to sleep for a bit"; all
 7 right?
 8 A. Yes.
 9 Q. "We've spoken to C", that is a reference to Mr. Depp's sister,
 10 Christi; do you agree?
 11 A. Yes.
 12 Q. "We're going to set him up with Dr. Kipper on Wednesday,
 13 hopefully"?
 14 A. Yes.
 15 Q. "He won't be skipping it this time"?
 16 A. Yes.
 17 Q. Suggesting possibly that he had not attended a meeting?
 18 A. Yes.
 19 Q. All right. Over at page 30, please, "The doctor will fly to
 20 Boston. He's a much bigger deal than Charlie." Was Charlie
 21 another sobriety friend of his, Charlie Dunit?
 22 A. That is correct, yes.
 23 Q. I am not worried about bringing Charlie up. I'll do that for
 24 when he's awake." Then Ms. Heard said, "I've not heard from
 25 him, which I expected. I still want to fly back to New York

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1 DEUTERS - WASS
 2 today on the Red-Eye. I can't keep doing this." Did you know
 3 what she was talking about?
 4 A. I mean, I would assume that she was just, you know, talking
 5 about the clear conflict that they were having at this stage.
 6 Q. The argument, if I can use a neutral term, the argument on the
 7 plane?
 8 A. Yes.
 9 Q. She cannot keep doing this?
 10 A. Yes.
 11 Q. And then you say to Ms. Heard, "His phone is fucking up, I'm
 12 restarting it, you'll hear from him, I'm sure. There feels
 13 like a sea change in him this morning. He's just spoken about
 14 how bad he feels and he was not talking physically." So, not
 15 indigestion; agree?
 16 A. Yes. No.
 17 Q. So, did you understand why he felt so bad?
 18 A. Because I am sure that he loved her and he wanted to make the
 19 relationship work, and any conflict was very painful,
 20 upsetting to him.
 21 MR. JUSTICE NICOL: Just a minute. (Pause) Yes.
 22 MS. WASS: And then you said, "He's just texted you. He's
 23 incredibly apologetic and knows that he has done wrong." What
 24 were you referring to that Mr. Depp had done wrong, on your
 25 account?

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1 DEUTERS - WASS
 2 A. Probably by maybe breaking promises with regards to sobriety
 3 or taking, you know ---
 4 MR. JUSTICE NICOL: Just a minute. (Pause) Probably regarding
 5 sobriety and what else did you say, broken promises?
 6 A. Yes, yes, I mean, I was not au fait to all their -- in any
 7 conversations we had, there was just the general plan to kick
 8 the opiates and perhaps he had renegeed there.
 9 MS. WASS: Then you say, "He wants to get better now, he has been
 10 very explicit about that this morning." I think that text
 11 speaks for itself. Then you say that you feel like "we are at
 12 a critical juncture".
 13 A. Yes.
 14 Q. And then Ms. Heard said, "Yes, but I don't know how to be
 15 around him after what he did to me yesterday."
 16 A. Yes.
 17 Q. Did you have any idea what she was talking about?
 18 A. "After what he did to me yesterday" -- I mean, probably at
 19 this point, I was starting to assume what she was referring to
 20 because of how she reacted on the plane.
 21 Q. And that was the light tap on the bottom?
 22 A. Yes.
 23 MR. JUSTICE NICOL: Just a minute. (Pause) Yes.
 24 MS. WASS: Something you thought was playful, did you?
 25 A. I mean, that is the term I used. I do not even know if it

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1 DEUTERS - WASS
 2 connected. I just remember a foot going up.
 3 Q. Was that not the time for you to say to Ms. Heard, "Come on,
 4 it was not anything serious. He was just mucking around"?
 5 A. I did not really interact with Ms. Heard at that point. I sat
 6 down with Johnny. I believe it was Jerry and maybe Keenan
 7 maybe -- I could be wrong -- but I believe those two spoke
 8 with Ms. Heard after that incident. I think I sat with
 9 Johnny.
 10 Q. You sat with Mr. Depp?
 11 A. Yes.
 12 MR. JUSTICE NICOL: Just a minute. The question was, why did you
 13 not say to her, "It was just playful"? At this point, you are
 14 exchanging texts with Ms. Heard and your explanation for not
 15 saying to Ms. Heard that this was just playful is what?
 16 A. I suppose I do not have one. I mean, I was seeking to
 17 probably sort of deflate the situation. I mean, and if --
 18 sorry, deflate the situation, and had I used that terminology,
 19 I do not think that would have been received very well. It
 20 was not my job to be a relationship counsellor. I often find
 21 myself in this position throughout my life, as the middle
 22 person. As a domestic abuse survivor myself, I do not do well
 23 with conflict. I always seek to mollify or appease and I was
 24 not comfortable in this position, or sending these texts. All
 25 I sought was to, you know, yes, deflate, appease, and kind of

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1 DEUTERS - WASS
 2 just say what I thought was what people wanted to hear, to be
 3 quite honest.
 4 MS. WASS: So you did not say, to try and calm things down, "Look,
 5 he did not mean to hurt you"?
 6 A. No.
 7 Q. You did not that that would have mollified her?
 8 A. Yes, I think, having my opinion on it, I think it would have
 9 created -- this would have gone south. I did not want that.
 10 I just wanted to keep the peace, really.
 11 Q. It would have gone south with her to say, "Look, he was
 12 mucking around. He did not mean it"?
 13 A. Yes.
 14 Q. You think that would have inflamed Ms. Heard, do you?
 15 A. Yes.
 16 Q. And why was that, that inflaming?
 17 A. Because I do recall on the plane that she used the adjective.
 18 That is where I got the word from.
 19 Q. So she said on the plane, "Johnny kicked me" or something like
 20 that?
 21 A. Yes.
 22 Q. You and the other assistants did nothing; is that right? You
 23 did not intervene or anything like that?
 24 A. No, at that point because -- no, that is not true. When that
 25 sort of playful attempt that connected or did not connect -- I

[24] (Pages 785 to 788)

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1 DEUTERS - WASS
 2 could not tell you -- occurred, Ms. Heard, you know, made a
 3 point. She was very upset at that point and used the word. I
 4 remember that because we got up from our seats, myself and
 5 Jerry certainly, in order to intervene. You know, it had
 6 clearly reached a point where, you know, we wanted to help or
 7 stop or whatever so, no, we did intervene.
 8 Q. So you did intervene?
 9 A. Yes.
 10 Q. All right, and she was upset because as far as she was
 11 concerned, she had been kicked in the back?
 12 A. Yes. That is what she was saying, yes.
 13 Q. And I think you were way away and said you did not see this as
 14 clearly as you could have done; is that right?
 15 A. Yes, I saw it pretty clearly. I could not hear because I may
 16 have had -- I remember I definitely had my headphones on for
 17 the majority of it. Even if I did not have my headphones on,
 18 I probably would not have been able to hear what was being
 19 said, but you know, I had the visual. I could see quite
 20 clearly, yes.
 21 Q. You see, Ms. Heard, if we can carry on with this text exchange
 22 between the two of you, said, "I don't know if I can stay with
 23 him. I need time"?
 24 A. Yes.
 25 Q. She is referring to just a playful tap on the bottom, is she,

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1 DEUTERS - WASS
 2 as far as you are concerned?
 3 A. I could not -- I mean, yes, I would suppose so, or how she
 4 interpreted it. I am assuming on her behalf. I cannot ----
 5 Q. "He wants to see you so much. He is distraught", you said?
 6 A. Yes, I do recall. He was very low, and ----
 7 Q. And then she said she would sort out her own flights back, and
 8 then she said, in this slightly longer text, "Look, he thinks
 9 he doesn't deserve this. Obviously, he has no idea what he
 10 did or to the extent that he did it. If someone was truly
 11 honest with him about how bad it really was, he'd be appalled.
 12 The man Johnny is would be humiliated and definitely wouldn't
 13 say to me that he doesn't deserve it. I am sad he does not
 14 have a better way to really know the severity of his actions
 15 yesterday. Unfortunately for me, I remember in full detail
 16 everything that happened."
 17 Having seen the way Mr. Depp behaved on that plane, do
 18 you consider that he would have been appalled if he could have
 19 remembered with clarity what he had done?
 20 A. I have no doubt he would not have liked that sort of, you
 21 know, kind of myopic condition he was in, not being very
 22 communicative. I know he would not have liked that, but as to
 23 anything else on the plane that occurred, I could not -- I
 24 mean "appalled" seems ----
 25 Q. You see your next text says ----

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1 DEUTERS - WASS
 2 A. ---- a heavy word.
 3 Q. ---- this. Can you see the next one down?
 4 A. Yes.
 5 Q. "He was appalled, and when I told him he kicked you, he cried.
 6 It was disgusting and he knows it." Did he cry, Mr. Depp,
 7 when you said what he had done to Ms. Heard?
 8 A. I do not recall. Obviously, I have written it there, but I do
 9 not recall that, no.
 10 Q. You see, on the face of it, Mr. Deuters, this series of texts
 11 is a clear admission by you to Ms. Heard that Mr. Depp had
 12 kicked Ms. Heard and that he did not remember doing so. Do
 13 you agree with that interpretation of those texts?
 14 A. I mean, it is not my interpretation because I know why those
 15 were sent, why they were sent, but I understand that is how
 16 they can be interpreted, yes.
 17 Q. Your interpretation which you put in your statement is that
 18 you were just saying what Ms. Heard wanted to hear?
 19 A. Yes, and in my conversation with Mr. Depp at the time, he said
 20 placate her, you know, say what you want to say, calm her
 21 down. As I have said, often I find myself in this unfortunate
 22 position and "kicked" was the adjective she was using on the
 23 plane so "kicked" was the word I use here. I obviously regret
 24 that. I did not realise what was being put together at the
 25 time.

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1 DEUTERS - WASS
 2 Q. When you first heard that these texts had been made public,
 3 you took a very different position, did you not? Can you go
 4 to file 5, tab 186.
 5 MR. JUSTICE NICOL: 5, 186.
 6 MS. WASS: File 5, tab 186. 176, sorry. Have you got that,
 7 Mr. Deuters.
 8 A. 176? Yes.
 9 Q. Yes. F1130?
 10 MR. JUSTICE NICOL: Just a minute. (Pause)
 11 MS. WASS: That is an article in a newspaper, do you agree, dated
 12 2nd June 2016?
 13 A. Yes.
 14 Q. So, after the instigation of divorce proceedings; do you
 15 agree?
 16 A. Right, yes.
 17 Q. This is an article about you, really, is it not, Mr. Deuters:
 18 "Johnny Depp assistant says texts were doctored", and then
 19 turn over to the other page, which is F1131?
 20 A. Yes.
 21 Q. "Johnny Depp's assistant, Stephen Deuters, tells TMZ that the
 22 texts that were posted in which he allegedly apologised to
 23 Amber Heard for Johnny's violent behaviour are heavily
 24 doctored and he never said Johnny attacked her. Deuters said
 25 he knows of no acts of abuse towards Amber at the hands of

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1 DEUTERS - WASS
 2 Johnny and has never made such a claim to anyone. He added
 3 Johnny has never been violent towards anyone he knows.
 4 Deuters said the texts themselves are suspicious because they
 5 don't even show a date. Bottom line, he says he will testify
 6 under oath he never had a conversation about alleged violence
 7 with Amber." That is what you were saying, Mr. Deuters,
 8 publicly, about these texts?
 9 MR. JUSTICE NICOL: Well, do you agree, Mr. Deuters, that the
 10 article reflects what you were saying at the time?
 11 A. No, your Honour. I never spoke to TMZ. I never had a
 12 conversation with anyone about these texts outside of Johnny's
 13 then counsel. I do not recall exactly who it was. They asked
 14 me about the texts and I said to them that they were taken out
 15 of context. I never used the word "doctored". I never said
 16 that to a solitary soul.
 17 MS. WASS: Let us take that in stages, if I may. TMZ is some sort
 18 of celebrity publication.
 19 A. As I believe, yes.
 20 Q. And they asked you for your comment, did they?
 21 A. No.
 22 Q. How did they come to say that you said, it is my fault,
 23 I thought you had said somebody asked you about the texts?
 24 A. It was Johnny's counsel at the time.
 25 Q. A lawyer?

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1 DEUTERS - WASS
 2 A. A lawyer or somebody who worked with the lawyers. I guess his
 3 divorce lawyers or his divorce team, and they asked me about
 4 the texts, because they had come out. And they said, are
 5 these real, and I said yes. And they said, can you say any
 6 more about them? And I said, well, they are taken out of
 7 context, you know, what I meant by that is really just the
 8 bigger picture. I never spoke to TMZ and I never said to
 9 anyone, even the counsel, that they were doctored.
 10 Q. I mean, when did you first see this article?
 11 A. Probably the day it came out. It was very distressing.
 12 Q. Yes. Did you phone up the editor of TMZ and say, "Look,
 13 I have been quoted as saying these texts are doctored, that is
 14 not what I am saying at all"?
 15 A. It did not occur to me. I did not really want to be involved
 16 in any shape or form. I felt like my goodwill was being
 17 thrown back in my face and somehow these texts got leaked.
 18 Someone had a conversation with TMZ that was not me. In
 19 retrospect ----
 20 Q. Forgive me, I interrupted you.
 21 A. In retrospect, I would have loved to have had the courage to
 22 say that to TMZ. I may be even have asked his counsel at the
 23 time, I do not recall though. I may have had a conversation
 24 with them after the fact, but I do not recall.
 25 MR. JUSTICE NICOL: Sorry, you may have had a conversation with

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1 DEUTERS - WASS
 2 TMZ?
 3 THE WITNESS: No. Johnny's counsel at the time, the -- his
 4 divorce lawyers, but.
 5 MS. WASS: You see, we will see, Mr. Deuters, probably after lunch
 6 now, that in about June 2016, you were very much involved in
 7 Mr. Depp's PR campaign, in the context of his arguments with
 8 Ms. Heard. Do you agree with that statement?
 9 A. I am not sure, to be honest. I do not really know what a PR
 10 campaign is.
 11 Q. You know, fighting back, finding information that was adverse
 12 to Ms. Heard and making sure that went into the public domain,
 13 that sort of thing?
 14 A. I generally do not recall. I would have to look.
 15 Q. We will look at it later, but you did not, for whatever
 16 reason, pick up a telephone or send an e-mail to this
 17 publication saying, "This is inaccurate, this is not what I am
 18 saying about the texts at all"?
 19 A. Correct, absolutely not.
 20 MS. WASS: My Lord, can we do the last section before the short
 21 adjournment?
 22 MR. JUSTICE NICOL: Which tab, remind me?
 23 MS. WASS: It is the text schedule, bundle 6, 119.
 24 MR. JUSTICE NICOL: Can I put file 5 away?
 25 MS. WASS: You can, yes.

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1 DEUTERS - WASS
 2 THE WITNESS: Sorry, I missed that.
 3 MS. WASS: Tab 6, file 6. You can put that file away. Page 31 at
 4 the bottom.
 5 A. Yes.
 6 Q. You are still on 25th May, so the day of the plane landing.
 7 A. Yes.
 8 Q. What Ms. Heard is saying to you, bottom text, please, because
 9 you and she had had this exchange, do you remember we looked
 10 at it a moment ago?
 11 A. Yes.
 12 Q. About "...he was appalled and when I told him he kicked you,
 13 he cried." She said this: "He's done this many times before.
 14 Tokyo, the island, London, remember that? And I always stay.
 15 Always believe he is going to get better. And then, every
 16 three months or so, I am in the exact same position." What
 17 was Ms. Heard referring to, did you know?
 18 A. I can only assume -- I mean, I can only assume, you know, for
 19 further conflict, perhaps further, you know, reneged on his
 20 promise to stop with the opiates. Yes, that is the same
 21 period. I can only assume that.
 22 Q. Do you remember an incident in Tokyo, for example?
 23 A. I remember him being late for a press conference once, because
 24 of an argument I guess they had had in the room. I recall
 25 that.

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1 DEUTERS - WASS
 2 Q. This is Mr. Depp and Ms. Heard having an argument in Tokyo?
 3 A. Yes.
 4 Q. Causing you to be late for a conference?
 5 A. Yes.
 6 Q. The island?
 7 A. I do not, no.
 8 Q. London?
 9 A. I have to say no. I would need the date. I do not recall.
 10 Q. And Ms. Heard is saying: "Despite all those many times
 11 before, I always stay", and then she says, "every three months
 12 or so, always believe he is going to get better, every three
 13 months or so, I'm in the exact same position." You understood
 14 exactly what she was talking about, did you not?
 15 A. I mean, well, with regards to, yes, him still, you know, being
 16 on the opiates specifically.
 17 Q. It was not just the opiates, because the opiates turned him
 18 into "a monster", did they not, they caused him to act very,
 19 very badly and then forget what he had done?
 20 A. I am not against -- but opiates ----
 21 Q. Shall I make it plain to you ----
 22 MR. SHERBORNE: Can you let him finish the answer to the question.
 23 You asked him what they did and he was going to answer.
 24 MR. JUSTICE NICOL: Just a minute. Ms. Wass, you want to modify
 25 your question.

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1 DEUTERS - WASS
 2 MS. WASS: I do, I do. I think it would save time.
 3 (To the witness) It was not just the opiates,
 4 Mr. Deuters, it was opiates, cocaine, pills, and excessive
 5 quantities of alcohol, all of this, this cocktail of drugs and
 6 alcohol turned Mr. Depp into "a monster" when he behaved
 7 appallingly to Ms. Heard and he would forget what he had done?
 8 THE WITNESS: Well, I refute that, because I never was witness to
 9 it.
 10 Q. You never witnessed it?
 11 A. No.
 12 Q. You do not suggest that the Boston plane incident was an
 13 example of this?
 14 A. No, I do not. Because, yes, his -- I describe what I recall
 15 from his movement, his mood, it was all very introverted, and
 16 that is what opiates will -- you know, taking too many,
 17 especially if you are doing it with marijuana, because it is
 18 similar down drugs that do that to you. They do not make you
 19 jump around and scream; they do the opposite.
 20 Q. What about the vodka Red Bulls?
 21 A. I do not remember -- I do remember Red Bulls at the time, but
 22 I do not, obviously, Red Bull is an upper. I do not remember
 23 any on the plane.
 24 Q. Finally then, your answer to Ms. Heard's complaint that he had
 25 done this so many times before, page 32, was to say: "I know,

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1 DEUTERS - WASS
 2 it's hideous, but that is one side of the man you fell in love
 3 with and one side of the man that fell in love with you." So,
 4 there was more than one side to Mr. Depp, was there not?
 5 A. I feel that is just a turn of phrase, really.
 6 Q. "I know you're hurting and you have every right to, and he
 7 knows that."
 8 A. Yes. I think that is a case of me doing a placating, but also
 9 being genuine, your know, because he wanted to get better, we
 10 wanted him to get better with regards to the opiates, and he
 11 did that summer. So, that is probably what that is referring
 12 to.
 13 Q. So, anything to do with references to violence or kicking, you
 14 say simply was you humouring Ms. Heard; is that right?
 15 A. Well, I think, I am not aware of anything else.
 16 Q. "He was appalled when I told him he had kicked you, he cried."
 17 A. Yes.
 18 Q. Did you think that was going to calm her down?
 19 A. Yes, I suppose I did. I suppose I did. Otherwise I would not
 20 have sent it. It was after a conversation with Mr. Depp to,
 21 you know, to mollify, you know, basically, along the lines of
 22 say something that she wants to hear, let us try and deflate
 23 this, and move on, and do better.
 24 Q. Would it not have been easier to tell the truth, if the truth
 25 had been that this was just him mucking around and he did not

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1 DEUTERS - WASS
 2 mean it?
 3 A. I mean, very possibly. I certainly -- yes, it is certainly
 4 possible. But I also do feel as though that could have, you
 5 know, if you do not agree with someone, even if it is the
 6 truth or not, it can make things worse.
 7 Q. You had a conversation with her by text about something which
 8 had not happened?
 9 A. Yes, I suppose so. Yes.
 10 MS. WASS: My Lord, is that a convenient time?
 11 MR. JUSTICE NICOL: Yes. Mr. Deuters, you are in the middle of
 12 giving your evidence. You must not talk about your evidence
 13 to anybody until that is concluded.
 14 THE WITNESS: Understood.
 15 MR. JUSTICE NICOL: That includes Mr. Depp's lawyers, who you may
 16 have been in touch with prior to today. Do you understand
 17 that?
 18 THE WITNESS: Understood, sir, yes.
 19 MR. JUSTICE NICOL: Good. I should say that I am not picking on
 20 you when I say this, I say this to any witness who is in the
 21 middle of giving their evidence.
 22 THE WITNESS: Understood, thank you.
 23 MR. JUSTICE NICOL: Good. We will start again at ten past two.
 24 (Adjourned for a short time)
 25

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1 DEUTERS - WASS
 2 MR. JUSTICE NICOL: Ms. Wass, I am a little concerned about
 3 timing.
 4 MS. WASS: Yes.
 5 MR. JUSTICE NICOL: How much do you think further you need to
 6 cross-examine?
 7 MS. WASS: I have another hour.
 8 MR. JUSTICE NICOL: I think it is going to have to be a little
 9 less than that.
 10 MS. WASS: I will do everything I can obviously.
 11 MR. JUSTICE NICOL: We are scheduled to have, it was going to be
 12 three, I am not sure whether Mr. Harrell is it?
 13 MR. SHERBORNE: There are two witnesses today, Mr. Harrell is not
 14 well.
 15 MR. JUSTICE NICOL: I got a message about that.
 16 MR. SHERBORNE: I am grateful. There is Mr. White and there is
 17 Ms. Esparza, who are waiting, as I understand it, at the video
 18 link. I am not sure if a message was able to be passed,
 19 I think it was, to Los Angeles to say we were running a little
 20 beyond. I do not imagine anyone realised it was going to be
 21 that far beyond, given Mr. Deuters' witness statement, but
 22 both those witnesses need to be dealt with today, my Lord,
 23 yes.
 24 MS. WASS: That will be a problem.
 25 MR. JUSTICE NICOL: I think you will need to be rather shorter

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1 DEUTERS - WASS
 2 than an hour with Mr. Deuters. I am going to ask you, please,
 3 to try and keep it to three-quarters of an hour.
 4 MS. WASS: I will absolutely do my best. May I offer some
 5 consolation that I will not be long with either of the two
 6 video link witnesses.
 7 MR. JUSTICE NICOL: That is helpful. Thank you.
 8 MR. SHERBORNE: Obviously there will be re-examination of
 9 Mr. Deuters.
 10 MR. JUSTICE NICOL: Of course. Yes, I understand that.
 11 MS. WASS: Mr. Deuters, you referred this morning to a
 12 detoxification process that was taking place with Dr. Kipper.
 13 THE WITNESS: Yes.
 14 Q. That was due to take place on Mr. Depp's island in August
 15 2014?
 16 A. Yes.
 17 Q. We have seen that the process started on 8th August, we have
 18 seen from the medical notes of Dr. Kipper.
 19 A. Yes.
 20 Q. What I want to establish from you, please, is this: in the
 21 days and couple of weeks leading up to the detoxification
 22 process, Mr. Depp showed a reluctance to give up alcohol and
 23 drugs and at one stage almost thought of cancelling or
 24 deferring the detoxification process. Does that sound
 25 familiar or would you like to think about it when you look at

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1 DEUTERS - WASS
 2 the records?
 3 A. I do not remember any specifics, but it does not sound
 4 surprising that he might, on occasion, you know, want to push,
 5 I think maybe he had some nerves about what the whole
 6 situation would entail. So, I suspect he had some nerves.
 7 Q. Or simply want to party a little bit more before he gave it
 8 all up?
 9 A. I could not assume on his behalf.
 10 Q. All right. Go to the text schedule in divider 6, please -- in
 11 file 6, the first divider. This is it the text schedule right
 12 at the beginning, 119.
 13 A. On 34?
 14 Q. Page 34 at the bottom.
 15 A. Yes.
 16 Q. As an example, on 24th July, Mr. Depp is sending you a text,
 17 "Need red wine!!!!"; yes?
 18 A. Yes.
 19 Q. And red wine was one of the things that he was going to have
 20 to be giving up during the detoxification process?
 21 A. I do not actually know. I do not know. I mean, he was
 22 definitely giving up the opiates, maybe it was alcohol as
 23 well. I genuinely do not know, I was not party to it.
 24 Q. In any event, he was asking you for red wine. Over on
 25 page 36, he is sending a text, at the top, to somebody called

[Page 804]

1 DEUTERS - WASS
 2 Rocky, that is Rocky Pennington, is that a name you are
 3 familiar with?
 4 A. Yes.
 5 Q. On 6th August, so two days before detox is supposed to start,
 6 he is texting Rocky Pennington: "Hey, just called you, do you
 7 have any mushrooms? Were planning on cooking on the island."
 8 Can you confirm they are not talking about porcini mushrooms,
 9 or anything like that, these are hallucinogenic mushrooms?
 10 A. I would not know anything about it.
 11 Q. You do not know anything about mushrooms?
 12 A. No.
 13 Q. If you look four down, Mr. Depp would disagree with you,
 14 because he said: "Do you know if we can have Stephen", that
 15 is you, is it not, Stephen?
 16 A. He would not contact me through Rocky.
 17 Q. "Do you know if we can have Stephen contact someone to procure
 18 some mushrooms?"
 19 A. That is the first I have ever seen or heard of that.
 20 Q. It may be the first you have seen of the text. Did you
 21 arrange to or were you asked to arrange to procure some
 22 hallucinogenic mushrooms on 6th August?
 23 A. I was not asked and I did not procure.
 24 Q. Had you been asked, would you have agreed to do it?
 25 A. I would not know where to get them.

[Page 805]

1 DEUTERS - WASS
 2 Q. Had you been told, would you have involved yourself in a
 3 transaction?
 4 A. I would probably have ignored the text, to be honest.
 5 Q. You would have probably done it, Mr. Deuters, because part of
 6 your function in life was to make sure that Mr. Depp got the
 7 drugs that he wanted.
 8 MR. JUSTICE NICOL: Do you agree or disagree?
 9 THE WITNESS: I -- sorry, please repeat your question.
 10 MS. WASS: It is not a complicated question. Part of your
 11 function was to make sure that Mr. Depp had the drugs, the
 12 illegal drugs that Mr. Depp wanted to have, and if that
 13 involved you passing them to him from one man to another, then
 14 that would be part of the job you were performing for him?
 15 A. As I said before, it was very rare, it was not something that
 16 was remotely prevalent. In the case of mushrooms, I do not
 17 believe I have ever been asked nor seen nor -- yes, that one
 18 (unclear) to me I am afraid, sorry.
 19 Q. Page 36 at the bottom, Mr. Depp contacts you, this is second
 20 from the bottom, on the 7th, so this is the day before detox
 21 is supposed to start, 7th August.
 22 A. Yes.
 23 Q. So, it is him, which you know is Mr. Depp, to you, Stephen
 24 Deuters.
 25 A. Yes.

[Page 806]

1 DEUTERS - WASS
 2 Q. And Mr. Depp is complaining: "She has accused me of boozing",
 3 now, would you agree that refers to Ms. Heard?
 4 A. "Accused me of being wasted" -- sorry, am I looking at the
 5 wrong text? My mistake.
 6 Q. "She has accused me of boozing", I want to establish that the
 7 "she" is Ms. Heard?
 8 A. I would assume so.
 9 Q. "I told her no. She is a cunt." I asked you this morning
 10 whether Mr. Depp would refer to women in general, and
 11 Ms. Heard in particular, and I used a number of offensive
 12 words.
 13 A. Yes.
 14 Q. One of them was cunt, and you denied it?
 15 A. Well, I did not have any sort of recollection, I do not recall
 16 the text.
 17 Q. Do you use that word about women?
 18 A. Certainly not.
 19 Q. Certainly not. Okay. So, Mr. Depp was saying: "She keeps
 20 accusing me of being wasted on something every night, or
 21 sometimes she likes to make me look an idiot for being stoned
 22 and smarter than she is I'm so sick of it." So, what Mr. Depp
 23 is saying to you is, even though it is the eve of his
 24 detoxification process, he is being nagged, if you like, by
 25 Ms. Heard, who is accusing him of drinking and of being

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1 DEUTERS - WASS
 2 stoned. That is a complaint made by Mr. Depp to you about
 3 Ms. Heard's criticism of him, Mr. Depp. Do you agree?
 4 A. Yes.
 5 Q. Now, could you go, please, to file 6, it is the same file.
 6 You have it in front of you.
 7 A. Yes.
 8 Q. Just go behind file 148A.
 9 MR. JUSTICE NICOL: Tab?
 10 MS. WASS: Tab 148A. It is file 6.
 11 THE WITNESS: Yes.
 12 Q. Now, the text that Mr. Depp has just sent you that we have
 13 looked at, "She is accusing me of boozing, she is accusing me
 14 of being wasted", I paraphrase. The second one, both of them
 15 were in fact on 7th August, and on 7th August, I want to ask
 16 you to look at a photograph. Do you see numbers at the bottom
 17 of the page, behind 148A?
 18 A. Yes.
 19 Q. They are F, they all start F894.something; yes?
 20 A. Yes.
 21 Q. Can you go to 894.024 and 025, if you open the page out.
 22 A. Yes.
 23 Q. Can you see there is a photograph on one side, with some
 24 computer-generated information on the other side?
 25 A. Yes.

[Page 808]

1 DEUTERS - WASS
 2 Q. If we look and start with the computerised material, it shows
 3 a date, about four lines down, of 7th August 2014. Do you
 4 agree?
 5 A. Yes.
 6 Q. So, that would be the same date you are getting the text from
 7 Mr. Depp saying that Ms. Heard had accused him of drinking and
 8 accused him of taking drugs?
 9 A. Yes.
 10 Q. We see three photographs of Mr. Depp -- no, two photographs of
 11 Mr. Depp. He appears to be unconscious, would you agree, or
 12 asleep?
 13 A. Yes.
 14 Q. And if asleep, in a very deep sleep, because he had poured
 15 some sort of ice cream, I am told. It was referred to this
 16 morning, there was a different date reference.
 17 A. Right.
 18 Q. Over his upper legs and on the floor. So, do you think,
 19 looking at that, he may well have passed out as a result of
 20 consumption of drink and drugs?
 21 A. Yes, it is certainly possible.
 22 Q. So, this was the very day before detox was supposed to start.
 23 Then, at page 37 of the text schedule, forgive me chopping and
 24 changing, the text schedule at page 37, at the bottom,
 25 Mr. Depp says, three texts from the bottom, so this is the day

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1 DEUTERS - WASS
 2 before detox: "I think I'm going to call Kipper and postpone
 3 our clean-up for this week. There's no way either way too
 4 much all of it"; yes?
 5 A. Yes.
 6 Q. That is to you?
 7 A. Yes.
 8 Q. And he is effectively saying, "I am really not up for making
 9 myself clean quite yet"; do you agree?
 10 A. Yes, absolutely.
 11 Q. So, there was no question of Ms. Heard trying to stop him from
 12 going to detox. In fact, the information you were getting is
 13 that she was scolding him for drinking and taking drugs?
 14 A. Yes, but with regards to the text you mentioned before.
 15 Q. Yes. That is what I am asking you, the picture we can gather
 16 from using these documents altogether. Now, Mr. Depp went on
 17 this process, I do not think you were on the island when he
 18 detoxed?
 19 A. No.
 20 Q. He was with Ms. Heard alone, with the medical staff; is that
 21 right?
 22 A. Yes, that is right.
 23 Q. By October, Mr. Depp had fallen off the wagon, if I can put it
 24 like that, and you may want to look at a text on page 43 of
 25 the text schedule.

[Page 810]

1 DEUTERS - WASS
 2 MR. JUSTICE NICOL: He had fallen off the wagon by what date?
 3 MS. WASS: 4th October. (To the witness) We see some angry
 4 messages expressing annoyance, when he sends a text, three
 5 from the bottom, to his sister: "I will savaged some
 6 motherfucker", on 21st September. The one I am asking you
 7 about is in October. It is a text he sends to himself and
 8 another number which is not identified. It says this, and
 9 I am going to ask you whether this rings any bells with what
 10 you saw of your boss around that time?
 11 A. Yes.
 12 Q. "I am going to quite gracefully glide into a massage of my
 13 broken back and neck ...(reads to the words)... every Goddamn
 14 day", he signs himself as "Shatter", is that how he would
 15 refer to himself, sometimes?
 16 A. I believe that is a reference to, because we were doing Alice
 17 in Wonderland.
 18 Q. So, the Mad Hatter?
 19 A. Yes.
 20 Q. Why "Shatter"?
 21 A. It is derogatory, and he would always be derogatory towards
 22 himself.
 23 Q. Derogatory why? Can you spell it out?
 24 A. I do not know, I do not really know, it was just some, he
 25 would often refer to himself in sort of, you know, a negative

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1 DEUTERS - WASS
 2 manner if something is ----
 3 Q. What is negative about "Shatter", is it some joke, a
 4 lavatorial joke?
 5 A. Yes. It is certainly that as well.
 6 Q. I think it is fair to say that Mr. Depp did have quite, he
 7 found jokes about faeces and things like that quite funny, did
 8 he not?
 9 A. Yes, I suppose so.
 10 Q. My Lord, I will give you the references because they do not
 11 need to be looked up, but on page 7 of our text schedule, he
 12 sends you a message saying, "I will poop on your chest". Do
 13 you want to check it if you do not take my word for it?
 14 Sorry, page 7?
 15 A. Page 7.
 16 Q. Page 7. I mean, that was a joke?
 17 A. Yes.
 18 Q. And then, on page 14, for example, there is another joke of
 19 this nature. At the bottom text, he says, "Will you squat in
 20 front of the door of the master bedroom and leave a giant coil
 21 of dookie so that Amber steps in it and thinks that it is one
 22 of the dogs. Primarily Boo has a major problem. It will be
 23 funny." So, Mr. Depp thought it would be a joke -- I am not
 24 suggesting you did it, may I make that plain -- that you
 25 defecated in front of the master bedroom and Ms. Heard should

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1 DEUTERS - WASS
 2 step in it and she might think it would belonged to one of the
 3 dogs?
 4 A. I think if I had attempted to follow those instructions, he
 5 would have stopped me.
 6 Q. I am not. Please do not misunderstand me.
 7 A. I understand.
 8 Q. This was what he found funny, all right, and calling himself
 9 "the shatter" is all part of that genre of humour?
 10 A. Yes.
 11 Q. Dealing with the text itself at page 43, leaving aside "the
 12 shatter", Mr. Depp is clearly talking about taking Ecstasy or
 13 MDMA?
 14 A. Yes. As it reads, yes.
 15 Q. As it reads. I mean, that does not come as any surprise to
 16 you, does it?
 17 A. A little bit surprised, because we were in England then,
 18 because that was in -- we were shooting that in London. I do
 19 not remember those substances much in London. So, a little
 20 bit, but it is not outside the realms of possibility.
 21 Q. Now, in early 2015, you flew with Mr. Depp to Australia to
 22 film Pirates of the Caribbean, one of the series of them?
 23 A. Yes.
 24 Q. And at that stage, I suggest you were involved in passing
 25 drugs to him through others. Could you go to page 57 of the

[Page 813]

1 DEUTERS - WASS
 2 texts. (Pause)
 3 A. Yes.
 4 Q. The bottom two texts. Mr. Depp asks you, "Yay, hello
 5 Master D". I think that was his nickname for you?
 6 A. Yes.
 7 Q. "I believe that Ryan Manson gave you a wee baggage for me.
 8 Where does it reside?" You say, "It is in your green bag,
 9 sir, towards the left-hand corner?"
 10 A. Yes.
 11 Q. That was a reference to drugs that Mr. Nathan Holmes had
 12 procured for Mr. Depp.
 13 A. Right.
 14 Q. Do you remember that now?
 15 A. I do not remember that specifically, but I do not deny it.
 16 MR. SHERBORNE: Just so that the witness is clear, Ms. Wass put it
 17 to the witness as though it was a fact so that is why
 18 Mr. Deuters said "Right". What he misunderstands is that
 19 Ms. Wass is not putting questions to him; she is putting
 20 statements. It is very important, if she is going to preface
 21 a question with a statement of fact, that she actually asks
 22 him whether he accepts it or not otherwise all that happens is
 23 that she is just using these as vehicles.
 24 MR. JUSTICE NICOL: Mr. Deuters, the reference to "a wee baggage"
 25 that we see in that text, do you agree that is a reference to

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1 DEUTERS - WASS
 2 drugs, illegal drugs?
 3 A. To me, that is a reference most likely to marijuana.
 4 MS. WASS: Can you have a look at file 7, tab 5B. That is another
 5 schedule of texts prepared by the solicitors in this case; all
 6 right?
 7 A. Right.
 8 Q. Do you have that? It should say H30.2 at the bottom?
 9 A. Yes.
 10 Q. If you go eight up from the bottom, we see a text from
 11 Mr. Depp, from him, "Have you heard from Manson Ryan?" Have
 12 you got that?
 13 A. Yes.
 14 Q. So we can get our dates, this is 26th February 2015.
 15 A. Right.
 16 Q. And Mr. Nathan Holmes received that text and replied, "I have.
 17 He asked if you wanted anything med-wise for tomorrow night"
 18 and Mr. Depp said, "Yes, and yes, and of course, yes, please,
 19 and you will pay Ryan for it." So, this is to Mr. Holmes?
 20 A. Yes.
 21 Q. So, these were not meds that were from the chemist or on
 22 prescription because they had to be paid for; do you agree?
 23 A. Yes.
 24 Q. A text from Mr. Depp, "Disappearance, we should have more happy
 25 pills." This was the day after. He writes back to

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1 DEUTERS - WASS
 2 Mr. Holmes, "Disappearance, we should have more happy pills."
 3 Do you know whether Ecstasy is referred to as a happy pill,
 4 one of the happy pills?
 5 A. Yes. I have heard that term before.
 6 MR. JUSTICE NICOL: Just a minute. (Pause) Yes.
 7 MS. WASS: Mr. Depp is saying, "We should have more happy pills."
 8 Obviously he is including himself. Are you able to say how
 9 many other people were included in that, "We should have more
 10 happy pills?"
 11 A. I could not assume. I am not sure.
 12 Q. And Mr. Holmes says, "We should have more happy pills." "Can
 13 you?" says Mr. Depp. Mr. Holmes said, "Yes, we can, I am
 14 giving them to Stephen to give to you"; all right?
 15 A. Yes.
 16 Q. And then Mr. Depp says, "Bully." Mr. Holmes says, "Woo hoo".
 17 Mr. Holmes says, "Pilltastic." Then over the page, please, we
 18 come to those texts which you have already looked at about
 19 Master Deuters, "I believe Ryan Manson has given you a wee
 20 baggage. It is in your green bag"?
 21 A. Yes.
 22 Q. Now you have seen the full extent of the texts, would you
 23 agree it looks as if it is the supply of happy pills, not
 24 marijuana?
 25 A. Yes. Looking at those texts, yes, perfectly possible.

[Page 816]

1 DEUTERS - WASS
 2 Q. Now, in terms of Australia, obviously this all took place in
 3 Australia because we know that ---
 4 A. Yes.
 5 Q. --- you travelled to Australia on 11th February?
 6 A. Yes.
 7 Q. And this was the end of February. You said in answer to,
 8 I think it must have been to Mr. -- no, sorry, Mr. Depp has
 9 said that Mr. Holmes would stock up in Australia. He had got
 10 to Australia early to stock up the fridge and speak to the
 11 chef. Does that accord with your recollection?
 12 A. So just to clarify, Nathan travelling earlier to Australia in
 13 order to set things up essentially?
 14 Q. Yes?
 15 A. Yes.
 16 Q. At the house that was rented, I think Mr. Depp had his own
 17 chef?
 18 A. Yes.
 19 Q. And Mr. Holmes, Nathan Holmes, or one of the other members of
 20 Mr. Depp's staff, would stock the house up with whatever it
 21 needed. If he needed alcohol, they would stock it up with
 22 alcohol, if he wanted whisky or wine or tequila, that would be
 23 the job, would it not, of one of Mr. Depp's staff to make sure
 24 that Mr. Depp's needs were accommodated?
 25 A. Yes.

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1 DEUTERS - WASS
 2 MR. JUSTICE NICOL: Just a minute. (Pause) Including alcohol?
 3 A. Yes.
 4 MS. WASS: If there was alcohol in the house, it would have been
 5 because Mr. Depp had asked for the alcohol.
 6 A. I do remember there was a bar in the house, which may have
 7 been stocked when they arrived, but I could not say either
 8 way.
 9 MR. JUSTICE NICOL: What you were asked, Mr. Deuters, was that if
 10 that was the case, if there was alcohol in the house, it would
 11 be because Mr. Depp had asked for it.
 12 A. Right, which is yes, I mean ----
 13 Q. Do you agree with that?
 14 A. Yes. Yes.
 15 MR. JUSTICE NICOL: Thank you.
 16 MS. WASS: Now, Ms. Heard arrived, and at the time Ms. Heard
 17 arrived, was Mr. Depp having a bit of aggravation with the
 18 production company on the film?
 19 A. Not that I recall, before she arrived, no.
 20 Q. Can you go to the text schedule behind tab 6. Put file 7
 21 away, please. Go to page 58 at the bottom. This is now 6th
 22 March. The third text down is from him to you. Do you see
 23 it?
 24 A. Yes.
 25 Q. He says, "Honestly, I will not again be doing anything that

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1 DEUTERS - WASS
 2 involves the discussion of furthering my embarrassment of
 3 having whored for all these fucking wasted pieces of shit,
 4 nothing years on characters so that I ignorantly started to
 5 think of as my legacy. Every cuntin' fight, every fucking
 6 time, I held my ugliness and rage deep down and yet ----
 7 MR. JUSTICE NICOL: Deeper.
 8 MS. WASS: Thank you, my Lord.
 9 MR. JUSTICE NICOL: "I held my ugliness and rage deeper down."
 10 MS. WASS: "... deeper down and get in check when there was still
 11 room in my head to do such a thing." Do you agree that
 12 Mr. Depp appears to be expressing his dissatisfaction with his
 13 relationship with -- was it Disney who was involved in the
 14 Pirates ----
 15 A. Disney were the production company. I mean, it seems to be a
 16 sort of general opinion of his career perhaps. I do not
 17 remember the specifics.
 18 Q. You said in reply this: "When I was a kid, I loved my
 19 writers, my directors, my musicians, but there was only one
 20 actor I loved, one actor whose films I would go and see every
 21 single one of at the cinema, and I was not alone, nor am I
 22 now. You are a maverick, an artist, a bona fide fucking
 23 legend, one of the all-time greats of all time. You are loved
 24 out there in the world and anybody everybody wants to see on
 25 screen is the Johnny Depp they know and love."

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1 DEUTERS - WASS
 2 You go on in this vein, really lavishing praise on him,
 3 and then, three lines from the bottom, you say: "To call it an
 4 honour to work for you does not do my feelings on the topic
 5 any justice whatsoever, but save to say I would not work for
 6 anyone else. You are the reason I am in this business and by
 7 fuck does this business need you." You were telling Mr. Depp
 8 he is the reason that you are in the business. Was it true
 9 then?
 10 A. Yes.
 11 Q. Is it still true?
 12 A. Yes.
 13 Q. Now, Mr. Depp was involved in an incident in Australia when he
 14 injured or his finger was injured very badly, I will put it in
 15 neutral terms. A number of his staff were called to the
 16 house. Were you one of those who went to the house?
 17 A. No.
 18 Q. I think it is right to say that Malcolm Connolly and Ben King
 19 were there?
 20 A. Yes.
 21 Q. We have transcripts of conversations at the house. We can
 22 listen to them if you like or I can take you to the
 23 transcripts, but I would like you to confirm that there was an
 24 enormous amount of damage done to that house?
 25 A. I never went to -- I did not ----

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1 DEUTERS - WASS
 2 Q. I understand you did not go. You are his personal assistant.
 3 Something like that would not -- I am talking about \$100,000
 4 worth of damage, not just a broken vase?
 5 A. Yes.
 6 Q. Does that sound familiar?
 7 A. Yes. I am aware there was damage to the house, yes.
 8 Q. But not just damage, in the region of \$100,000?
 9 A. I did not know it came up to that number. I did not deal with
 10 that.
 11 Q. No, but windows were broken, televisions were broken, there
 12 was paint all over the house. Mr. Depp painted with his
 13 bloodied finger on mirrors ----
 14 MR. JUSTICE NICOL: Ms. Wass, if Mr. Deuters does not know about
 15 the damage or the extent of it, I am not sure that it is
 16 productive to ask him further.
 17 MS. WASS: All right. Can we agree to this extent, that it came
 18 to your attention that damage was done to the house and a lot
 19 of money had to be spent to compensate the owners?
 20 A. Yes. I am aware there was much damage, and beyond that, yes,
 21 I never saw it myself. I just saw pictures.
 22 Q. Can you go to page 59 of the texts, please?
 23 A. Yes.
 24 Q. You sent a text to Mr. Depp's sister after you were aware of
 25 Mr. Depp having injured his finger?

[Page 821]

1 DEUTERS - WASS
 2 A. Yes.
 3 Q. And it is the second from the bottom: "Hi C". That is
 4 Christi?
 5 A. Yes.
 6 Q. "Not sure how much you are aware of right now, but I am at the
 7 house with Kipper and Debbie." Do you see that?
 8 A. Yes.
 9 Q. It seems you were at the house?
 10 A. Yes. I do not know when that was. I certainly was not there,
 11 I certainly was not there when the problems, you know, the
 12 alleged damage was done. I do not know when that was.
 13 Q. There is no question that you were there during the time the
 14 damage was done. What I asked you was whether you had seen
 15 the damage?
 16 A. Yes. I genuinely do not recall.
 17 Q. You do not remember the \$100,000 dollars worth of damage?
 18 A. Not with my own eyes, no.
 19 Q. Okay. "Not sure how you much you are aware of right now, but
 20 I am at the house with Kipper and Debbie." That is a nurse.
 21 A. Yes.
 22 Q. "Who were speaking with JD and Amber respectively...(reads to
 23 the words)... between the two here. So Kipper is now talking
 24 to JD and hoping to get through to him and explaining to him
 25 that 'this period' needs to end before we get into real

[Page 822]

1 DEUTERS - WASS
 2 trouble. I will keep you posted on the outcome." That period
 3 that needed to end before we get into trouble, was that
 4 Mr. Depp's excessive drink and drugs consumption that had
 5 taken hold again?
 6 A. Yes, I suppose I must be referring to something along those
 7 lines, yes. I am trying to rack my brains as to anything
 8 specific because that was past, that was once he had kicked
 9 the opiates.
 10 Q. "Kipper is now talking to JD, hoping to get through to him and
 11 explain that this period needs to end"?
 12 A. Yes.
 13 Q. Right?
 14 A. Yes.
 15 Q. "I will keep you posted on the outcome. The good news thus
 16 far is that JD did not...(reads to the words)... and we will
 17 do whatever we need to." So, you are keeping Christi
 18 informed, and over on page 60, you say, second text down,
 19 "Well, conversations seem to be going well. JD is agreeing to
 20 all Kipper is requesting in order to turn himself around. Of
 21 course, we have heard that before, so we will see. They are
 22 now sat with Amber as well but looking up to wrap soon"; yes?
 23 A. Yes.
 24 Q. So, Dr. Kipper is requesting, well, hoping to turn Mr. Depp
 25 around. Again, you are saying, "We have seen that before",

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1 DEUTERS - WASS
 2 words to that effect?
 3 A. Yes.
 4 Q. Was that the way you felt about Mr. Depp's addiction and
 5 attempts to detoxify?
 6 A. Yes, there was some back and forth over the years.
 7 Q. And this was not the first time that Mr. Depp had damaged
 8 property as a result of his consumption of drink and drugs,
 9 was it?
 10 A. Sorry, I am not sure ----
 11 Q. Do you remember him going to Hicksville trailer park around
 12 his birthday in 2013?
 13 A. I am aware of it, but I do not think I was in country.
 14 Q. Are you aware that damage was done and people had to be
 15 compensated?
 16 A. I am not, sorry, not that I recall.
 17 Q. But you went with Mr. Depp to the hospital?
 18 A. Yes.
 19 Q. After these texts were sent, obviously, because he did not go
 20 back to the house; we know that?
 21 A. Yes, because I was at the hotel where we were staying, yes.
 22 Q. You went to the hospital and there was a problem. Who was in
 23 the car apart from yourself and Mr. Depp -- Mr. Connolly?
 24 A. Probably, most likely, yes. I cannot remember exclusively.
 25 It is likely.

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1 DEUTERS - WASS
 2 Q. And the idea was that you were going to have to make up some
 3 sort of story about how Mr. Depp had injured his finger, when
 4 the hospital asked, which they were bound to do?
 5 A. I think, I mean, I am not sure exactly when we found out how
 6 he did hurt his finger. I am not sure exactly when we found
 7 that out. I do remember not wanting to assume, I do remember
 8 having conversations, I think, with Christi, not to assume
 9 anything with regards to the production company.
 10 Q. Yes.
 11 A. That was the main point, I think.
 12 Q. This could have been a PR disaster, could it not?
 13 A. Certainly, yes.
 14 Q. He was in a shocking state, he had trashed the house, and this
 15 is not the Disney image that he was looking for at this
 16 particular time of his career?
 17 A. No.
 18 Q. And indeed you are absolutely right. On page 61, Christi sent
 19 a text to you in the middle of that page?
 20 A. Yes.
 21 Q. "Just make sure you say you are not sure how he hurt his
 22 hand"?
 23 A. Yes.
 24 Q. In fairness, just so we know, that is a couple of days after
 25 the hospital visit?

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1 DEUTERS - WASS
 2 MR. SHERBORNE: My Lord, it is not, it is the day. Which text are
 3 you looking at?
 4 MS. WASS: 9th March.
 5 MR. SHERBORNE: The hospital is on 8th March.
 6 MS. WASS: Yes, 9th March.
 7 MR. JUSTICE NICOL: I think we have seen some reference to medical
 8 notes, both on the 8th and the 9th March.
 9 MS. WASS: Yes. What I am suggesting to you -- and tell me if you
 10 agree -- is that you and Mr. Depp and Mr. Depp's sister and
 11 Mr. Depp's associates were very keen to make sure that his
 12 behaviour on the occasion when his finger was injured did not
 13 become public. Do you agree or disagree?
 14 A. I disagree in part just with regards to the fact that I think
 15 it was more very specifically with regards to the injury
 16 itself and how that was recorded with the production company.
 17 Those things are very specific, and because the specifics are
 18 a little bit vague at that point, right away, we -- yes, I was
 19 informed not to rush out and say anything too specific to the
 20 production company.
 21 Q. Because the fact of the matter was that Mr. Depp had no
 22 recollection of how his finger was injured?
 23 MR. JUSTICE NICOL: Are you able to ----
 24 MS. WASS: Do you agree or disagree?
 25 MR. JUSTICE NICOL: ---- say whether you agree or disagree with

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1 DEUTERS - WASS
 2 that?
 3 A. When he first came to where I was at the hotel, he generally
 4 was not speaking. I think the facts started to come out while
 5 we were at the hospital. I think that is where his (unclear).
 6 MS. WASS: For the avoidance of doubt, I suggest that he did not
 7 say to you or to anybody, in 2015, that Ms. Heard had been
 8 responsible for injuring his finger.
 9 A. Sorry, please repeat the question?
 10 Q. Mr. Depp did not say in 2015, this is March we are talking
 11 about ----
 12 A. Yes.
 13 Q. He did not say that Ms. Heard had injured his finger?
 14 A. No. He said that Ms. Heard had injured his finger.
 15 Q. And the account about Ms. Heard injuring it came out much
 16 later, after the divorce proceedings?
 17 A. Well, I suppose then it was maybe made common knowledge, but
 18 we knew before then.
 19 Q. Right. If you go to page 62, there is a text at the bottom of
 20 that page between somebody called Chad Oman -- is he something
 21 to do with public relations of ----
 22 A. Yes, he was one of the executive producers.
 23 Q. And it says, "Pirates steers off course. Johnny Depp injured
 24 his hand go-carting with Mick Duhan at Australian motor bike
 25 champion's luxury estate, forcing the star to fly home",

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1 DEUTERS - WASS
 2 obviously complete rubbish?
 3 A. Yes.
 4 Q. A lie, but certainly one that was told at this stage, on 12th
 5 March, to try to explain why Mr. Depp was unable to work
 6 because of his incapacitation?
 7 A. Yes. I suppose it was, yes. I do not know who came up with
 8 that story, but yes.
 9 Q. In fact, just shortly after that, Dr. Kipper refused to carry
 10 on treating Mr. Depp, did he not?
 11 A. I do not recall. I mean, it is pretty -- I mean, Kipper has
 12 been with Johnny for a long time, and still is.
 13 Q. He is now, but go to file 4, tab 135, please?
 14 MR. JUSTICE NICOL: Just a minute.
 15 THE WITNESS: It is possible he may have threatened. I do not
 16 remember. Which one?
 17 MS. WASS: 135. File 4.
 18 MR. JUSTICE NICOL: Did you say 135 or 134.
 19 MS. WASS: 135, please.
 20 A. 135.
 21 Q. Yes. It should say F763 at the bottom?
 22 A. Yes.
 23 Q. And this is a letter from Dr. David Kipper, dated 15th March
 24 2015. It starts by saying, "I am so sorry for your struggle."
 25 MR. SHERBORNE: I am sorry to interrupt Ms. Wass, but she has two

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1 DEUTERS - WASS
 2 minutes left and she is putting a document that Mr. Deuters
 3 has no knowledge of. If he is going to be asked about this,
 4 it has to be established that he knew that a letter had been
 5 sent.
 6 MS. WASS: I had asked the question whether he agreed that
 7 Dr. Kipper withdrew from treating Mr. Depp.
 8 MR. SHERBORNE: He said he did not know.
 9 MS. WASS: And I am reminding him. This is taking up time out of
 10 my 45 minutes.
 11 MR. JUSTICE NICOL: Ask the question.
 12 MS. WASS: Can you see at halfway through the page that he says,
 13 "It is with a very sad heart that I must withdraw my care. As
 14 I repeated to you several times, I will always be there if you
 15 decide to allow me to help you. What I believe you need is a
 16 clear system without any substances that could interfere with
 17 your medications and jeopardise your surgical procedure.
 18 Without this assurance, based on behaviours and not promises,
 19 I am putting you at risk. I refuse to put you in this
 20 dangerous position." Are you now able to confirm that
 21 Dr. Kipper withdrew temporarily, because you are absolutely
 22 right, he came back afterwards?
 23 A. I mean, that is what it says here. I do not, off the top of
 24 my head, recall Kipper having the discussion with me. Perhaps
 25 he did. I certainly have not seen this letter before, but

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1 DEUTERS - WASS
 2 certainly that is what it says, yes.
 3 Q. All right. Now, moving ahead in time, there was an effort for
 4 Mr. Depp to clean up his act during the summer months of 2015.
 5 There was a return to Australia with Ms. Heard and they were
 6 very happy days?
 7 A. Yes. Yes, the months of April, May?
 8 Q. Yes.
 9 A. I mean, I remember we went back to Australia and I remember we
 10 got back on the filming, yes.
 11 Q. Just to put it in context, if you go to the text schedule in
 12 file 6, so page 70 at the bottom?
 13 A. Yes.
 14 Q. Four up from the bottom, there is a text from Mr. Depp. This
 15 was in Australia, I suggest, on 26th April, to
 16 Mr. Jerry Judge: Thank you, my dear Jerry, very kind..."
 17 I ought to read Mr. Judge's text: "Hi boss. Just wanted to
 18 say if you and Amber need anything just let me know. I'll be
 19 there in 20 minutes. John, it is lovely to see how you and
 20 Amber are so happy. The other day, watching you sitting on
 21 the beach by the sea was fantastic. The two of you need
 22 happiness and it is really great to see that. Love to you and
 23 Amber."
 24 Mr. Depp says, "Thank you, my dear Jerry. Very kind,
 25 mate. We have been perfect. All I had to do was send the

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1 DEUTERS - WASS
 2 monster away and lock him up." Do you agree now that in this
 3 time, so April and May at least, this was a happy time for
 4 Mr. Depp and Ms. Heard together, and he was abstaining from
 5 controlled drugs?
 6 A. I think, yes, my principal recollection of this time is that
 7 yes, we were, everything was going well whilst we were
 8 filming, so it would suggest that if everything was well at
 9 work, everything was well at home.
 10 Q. Then he started to fall off the wagon again?
 11 MR. JUSTICE NICOL: Ms. Wass, five minutes, please.
 12 MS. WASS: Page 73. What you said is, "Hopefully, he will not
 13 read this till morning", three texts down. "You passed out in
 14 the makeup trailer. We couldn't quite get you up the stairs.
 15 There is food in the fridge in case you wake up." So, it
 16 looks like he has fallen off the wagon; do you agree?
 17 A. Yes, it would suggest that.
 18 Q. And on page 75 -- we are now in late August -- are you
 19 supplying him drugs in London, Mr. Depp, four texts down?
 20 "Shipment is happening this week." This is from you to
 21 Mr. Depp. "Our guy, Andy, here in London is carrying it down
 22 to you tonight. We'll keep you posted."
 23 A. No, that would refer to a chap by the name of Andy Hepburn,
 24 who works for a courier company. They were Superior Logistics
 25 so that could be clothes or books or something.

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1 DEUTERS - WASS
 2 Q. All right. We know that Mr. Depp and Ms. Heard separated on
 3 the 21st May. The last time they interacted in a way that was
 4 not part of a reconciliation process was 26th May. You were
 5 quite relieved, were you not?
 6 A. Yes. I suppose I would have been. I was not there. I was in
 7 England at the time.
 8 Q. What you said at page 175 of the texts -- this is to Paul
 9 Bettany -- three texts down, on 26th May, by this stage you
 10 had learned that Ms. Heard was going to file for divorce?
 11 A. Uh-huh.
 12 Q. And what you say to Mr. Bettany is, "That moment, when
 13 everything comes home to roost and all the shit compounds
 14 itself into one monstrous steaming pile of catastrophe
 15 ...(reads to the words)... Poor Betty Sue has been hurt on her
 16 way out." Then you say this, in the text down, "Sociopathic
 17 show pony, Machiavellian overlord, talentless cunt, good
 18 riddance to bad shit. Yes, I do mean Amber, not the mum."
 19 I asked you earlier whether you refer to women as cunts and
 20 you said absolutely not. Does this refresh your memory?
 21 A. Yes, it does, and I certainly regret using any language like
 22 that.
 23 Q. Go to page 181 of the texts. We are now on 29th May. You,
 24 amongst others, were involved in a public relations initiative
 25 to discredit Ms. Heard in the public eye. Do you agree?

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1 DEUTERS - WASS
 2 A. I mean, conversations might have occurred, but I was not
 3 involved with any PR firm that I can recall.
 4 Q. Second from the bottom, at page 181, there is a text from you
 5 to somebody called DGH Hoffmann & Gill. Who were they?
 6 A. That is a man by the name of Daniel Hoffmann Gill.
 7 Q. But what do they do?
 8 A. He is a friend.
 9 Q. A personal friend?
 10 A. Yes.
 11 Q. No business relations at all?
 12 A. No, he is an actor. No, he is just a friend.
 13 Q. You say: "I'll leave you with us, it's on public record that
 14 Amber Heard has been arrested for domestic violence before."
 15 A. Yes.
 16 Q. You were interested in drumming up some information adverse to
 17 Ms. Heard to suggest that she was the domestic abuser rather
 18 than your boss, Mr. Depp?
 19 A. I am sorry, can you repeat the question.
 20 Q. You were involved in trying to find out information and put
 21 information in the public domain that Ms. Heard was a domestic
 22 abuser?
 23 A. No. These are just texts between friends.
 24 Q. Go to page 184, please. This is from somebody called Bugle.
 25 A. Yes.

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1 DEUTERS - WASS
 2 Q. This is now 1st June, and it is from Bugle to you. It says:
 3 "Colleen lived in the apartment next to Tasya and Amber", that
 4 is Tasya van Ree?
 5 A. Yes.
 6 Q. "In Puerto Rico and says they constantly heard screaming
 7 fights which were so loud, vivacious and frequent that it was
 8 a real problem being their neighbours." You were actively
 9 trying to find out information suggesting that Ms. Heard had
 10 been abusive to Ms. van Ree?
 11 A. Yes, that is a text from Bugle, who is again a personal friend
 12 to me.
 13 Q. Why are you involving your personal friends in trying to find
 14 out information about Ms. van Ree and Ms. Heard?
 15 A. Probably just conversation. I mean, I certainly do not recall
 16 any sort of premeditated gathering of information.
 17 Q. Go to file 5 ----
 18 MR. JUSTICE NICOL: Now, Ms. Wass, you have had three-quarters of
 19 an hour.
 20 MS. WASS: Well, I would ask to be allowed to refer to one more
 21 document, and then I will ----
 22 MR. JUSTICE NICOL: Just one more, but that must be it.
 23 MS. WASS: I understand. (To the witness) File 5, tab 176A. Do
 24 you see that, it is a newspaper report, "Amber Heard arrested
 25 for domestic violence against girlfriend"?

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1 DEUTERS - WASS
 2 A. Yes.
 3 Q. That newspaper report is dated 7th June, just within days of
 4 you having these conversations with your friends about her
 5 relationship with Tasya van Ree, and it suggests:
 6 "Amber Heard, who claims she was the victim of domestic
 7 violence, was herself arrested for domestic violence"; all
 8 right?
 9 A. Yes. I mean, I am no aware -- obviously I am aware of this
 10 document, but I had no prior knowledge to this fact before
 11 this was, came out that I recall.
 12 Q. Mr. Deuters, I suggest you are lying about that. You were
 13 making enquiries about the relationship between Tasya van Ree
 14 and Ms. Heard and you very much wanted to make sure there was
 15 information to counter that, anything could damage your boss,
 16 Mr. Depp, and the Johnny Depp brand through which you earn
 17 your livelihood?
 18 A. No, I did not make a concerted effort to put this sort of
 19 information into the public domain. I did not do that.
 20 MS. WASS: Thank you very much.
 21 MR. SHERBORNE: I do not know whether your Lordship is going to
 22 have a break this afternoon.
 23 MR. JUSTICE NICOL: I am content to carry on, unless, Mr. Deuters,
 24 you feel the need for a break?
 25 THE WITNESS: I am okay.

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1 DEUTERS - WASS
 2 MR. JUSTICE NICOL: Mr. Deuters is okay. We will carry on.
 3 MR. SHERBORNE: I do not know whether it is worth enquiring about
 4 the link in Los Angeles. I am very conscious that there are
 5 two people at least who are waiting to know. Ms. Wass said
 6 she was not going to be very long. It would be quite helpful
 7 to have something a little bit more specific for that.
 8 MR. JUSTICE NICOL: Mr. Sherborne, you are on your feet. You are
 9 the one who can give specific information and relay it through
 10 your solicitors.
 11 MR. SHERBORNE: I understand what your Lordship says. I am not
 12 cross-examining Ms. Esparza or Mr. White. I am very conscious
 13 that they are in Los Angeles, but I will proceed.
 14 MR. JUSTICE NICOL: You get on with your re-examination.
 15 MR. SHERBORNE: I will do, my Lord. Thank you.
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 25

[Page 836]

1 DEUTERS
 2 RE-EXAMINED BY MR. SHERBORNE
 3 Q. Mr. Deuters, I am going to ask you a series of questions
 4 pretty much in the same order you were asked by Ms. Wass,
 5 there may be times where, it is no discourtesy to you, but
 6 I may ask you to say yes or no, only because in the interests
 7 of saving a bit of time, sometimes it is easier. If you want
 8 to expand on anything, please feel free.
 9 A. Right.
 10 Q. So the first topic you were asked about was about your seeing,
 11 your knowledge of Mr. Depp taking drugs. I am going to ask
 12 you a couple of questions of things you said. You said in
 13 answer to Ms. Wass that you took her back, if I may say so, by
 14 saying that you did not see Mr. Depp take drugs for the first
 15 eight years of working for him. Just so that I understand,
 16 yes or no?
 17 A. Yes.
 18 Q. I saw you nod and it does not get picked up on the transcript.
 19 You started working for him in 2004?
 20 A. Yes, July I believe.
 21 Q. And in 2004, was he in a relationship?
 22 A. Yes.
 23 Q. Who was he in a relationship with?
 24 A. Vanessa Paradis.
 25 Q. Did you know Vanessa Paradis well?

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<p>1 DEUTERS - SHERBORNE</p> <p>2 A. Yes.</p> <p>3 Q. And you said that you did not see him take drugs for eight,</p> <p>4 the first eight years?</p> <p>5 A. At least, yes.</p> <p>6 Q. That, if my maths serves me correct, that takes us to about</p> <p>7 2012; is that right?</p> <p>8 A. Yes, it was summer 2012.</p> <p>9 Q. And you say it changed then. Do you remember why it changed?</p> <p>10 A. I feel like, as though he started to rely on medication. He</p> <p>11 was, I found him, you know, became more and more sad, quite</p> <p>12 depressed and I feel it was because of the relationship he had</p> <p>13 entered into at the time, and the effect it was having on him.</p> <p>14 Q. When you say the relationship he entered into at the time, do</p> <p>15 you mean Ms. Heard?</p> <p>16 A. Yes.</p> <p>17 Q. Just one question. Given what was put to you, would you say</p> <p>18 Ms. Paradis, just one question, was a submissive person who</p> <p>19 would do whatever Mr. Depp wanted?</p> <p>20 A. Absolutely not.</p> <p>21 Q. So, he enters into this relationship in 2012 with Ms. Heard.</p> <p>22 You were asked more specific questions, coming towards the</p> <p>23 flight on the plane from Boston to LA and asked about his</p> <p>24 reaction to various substances, Ms. Wass put various</p> <p>25 substances to you that he was supposedly taking.</p>	<p>1 DEUTERS - SHERBORNE</p> <p>2 Q. Foetal position?</p> <p>3 A. Yes, again, not common but it was witnessed.</p> <p>4 Q. I am going to stop you, because for us in court, seeing you</p> <p>5 physically do something is very helpful, but for the</p> <p>6 transcript it is completely lost. If you could explain, you</p> <p>7 were kind of holding yourself and doubling up?</p> <p>8 A. Yes.</p> <p>9 Q. Is that a fair way of summarising what you said?</p> <p>10 A. Yes.</p> <p>11 Q. Going back to it, in terms of cocaine, I think you were asked</p> <p>12 about, did cocaine make him very hyper?</p> <p>13 A. I mean, no. I mean, not particularly. It just sort of</p> <p>14 brought him to a normal level, that we normal people might</p> <p>15 operate at.</p> <p>16 Q. Can you go a little bit slower, only because his Lordship is</p> <p>17 writing a note. Cocaine would bring him up to a normal</p> <p>18 person's level?</p> <p>19 A. Yes, pretty much. Hyper or manic are not two words I would</p> <p>20 ever use to describe his behaviour ever.</p> <p>21 Q. Hyper or manic are not two words you would use to describe his</p> <p>22 behaviour ever?</p> <p>23 A. No.</p> <p>24 Q. Thank you. You were taken to a text with Mr. Bettany; do you</p> <p>25 remember?</p>
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<p>1 DEUTERS - SHERBORNE</p> <p>2 A. Yes.</p> <p>3 Q. What did you observe over the time was his reaction to taking</p> <p>4 marijuana?</p> <p>5 A. To taking marijuana, I suppose the classic reaction that</p> <p>6 anyone else would have, calming, sleeping, generally, you</p> <p>7 know, would ease anxiety, I suppose, yes.</p> <p>8 Q. And you said something very similar about the "roxies" I think</p> <p>9 is the name, that it would make him low?</p> <p>10 A. Yes, they were obviously quite strong; so, yes.</p> <p>11 Q. While we are on this, a couple of times you described, when</p> <p>12 you were asked about the word "pain" in the texts, and you</p> <p>13 described the pain could have been a hangover, even though he</p> <p>14 was not drunk, you said he could drink a lot but did not</p> <p>15 actually get drunk, it does not stop you getting a hangover.</p> <p>16 You also described the pain in the gastric area, and Ms. Wass</p> <p>17 was slightly dismissive and kept calling it a tummy ache or</p> <p>18 ingestion, is that the symptoms you saw as a result?</p> <p>19 A. Yes, certainly and I think it is in one of those texts as well</p> <p>20 that I refer to as indigestion. Yes, I think, again, not</p> <p>21 being a chemist but those kinds of drugs can interfere with</p> <p>22 that mechanism.</p> <p>23 Q. And did you see how badly or how moderately or?</p> <p>24 A. Sometimes, yes, he could be sort of foetal position on</p> <p>25 occasions.</p>	<p>1 DEUTERS - SHERBORNE</p> <p>2 A. Yes. No, which one ---</p> <p>3 MR. JUSTICE NICOL: There were quite a number of texts.</p> <p>4 MR. SHERBORNE: You are right, I was trying to cut this short,</p> <p>5 perhaps I was doing it unfairly. It is not meant to be a</p> <p>6 memory test. I know sometimes it feels like that, but it is</p> <p>7 not. Can you go to tab 119.</p> <p>8 MR. JUSTICE NICOL: Volume 6?</p> <p>9 MR. SHERBORNE: Volume 6, yes.</p> <p>10 THE WITNESS: Yes.</p> <p>11 Q. I am just going to ask you about -- I will find the text in a</p> <p>12 moment. It will be, obviously, in May 2013. That would be</p> <p>13 probably around about 9 -- it is the May 2013, to Paul</p> <p>14 Bettany. (Pause) It is May 2014, that is why I am not finding</p> <p>15 it. Sorry. Yes. It is at the top of page 34. Ms. Wass</p> <p>16 spent a lot of time asking you questions about this.</p> <p>17 A. Yes.</p> <p>18 Q. Whether what Mr. Depp said accorded with your recollection of</p> <p>19 events, and you said it did not. Do you know Paul Bettany?</p> <p>20 A. I, very -- in a minor manner. You know, we are not close, but</p> <p>21 I know Paul, yes.</p> <p>22 Q. You knew he was a friend of Mr. Depp's?</p> <p>23 A. Yes.</p> <p>24 Q. Would you say that Mr. Depp, I mean, in terms of how he</p> <p>25 communicates and texts and so on, does he send what one might</p>

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1 DEUTERS - SHERBORNE
 2 call very flat texts, very factual texts, what is his sort of
 3 text style in your experience of him?
 4 A. Very colourful.
 5 Q. Very colourful?
 6 A. Full of humorous, depending on the humour, extravagances and
 7 exaggerations.
 8 Q. Extravagances and exaggerations?
 9 A. Yes.
 10 Q. Keep your voice up slightly, that is all I was going to say.
 11 You said also he has a habit of speaking, putting himself
 12 down, being negative?
 13 A. Certainly.
 14 Q. Would you say that Mr. Depp was a boastful person, an immodest
 15 person?
 16 A. No, not at all.
 17 MR. JUSTICE NICOL: I assume that your "no" means he is not
 18 boastful, rather than he is not modest?
 19 THE WITNESS: I heard him say ----
 20 MR. SHERBORNE: I said "immodest", my Lord.
 21 MR. JUSTICE NICOL: I beg your pardon.
 22 MR. SHERBORNE: (To the witness) Can I briefly take you to file 8,
 23 and it is tab 62E, and it is an exchange we have seen before,
 24 but you were not shown, but on this point. Do you have 62E?
 25 THE WITNESS: Yes.

[Page 842]

1 DEUTERS - SHERBORNE
 2 Q. It is IO10, at the bottom right-hand, 62E.
 3 A. Yes.
 4 MR. JUSTICE NICOL: It looks like 1010.
 5 MR. SHERBORNE: Yes, right at the top we see you are sending an
 6 e-mail in the morning to Mr. Depp: "We're all set to leave
 7 here approximately 1.30 p.m. Hope you rested well, Master
 8 Deuters", I think that is what we were told MD means.
 9 A. Yes.
 10 Q. Then, you can see his response, over on IO9.
 11 A. Yes.
 12 Q. "I got drunk and destroyed my room. There are hookers and
 13 animals in here." Was Mr. Depp being serious?
 14 A. No. No, he was not.
 15 Q. Then, you can see: "Watch out for Mike Tyson", you say. Who
 16 was Mike Tyson you are referring to there?
 17 A. I mean, that was early days, but it certainly could have been,
 18 you know, with regards to the relationship he was involved in
 19 at the time.
 20 Q. I am going to ask you to be a little bit more specific?
 21 A. Ms. Heard.
 22 Q. Thank you. I appreciate you do not want to say that. Then we
 23 can see you wrote to him, saying -- he writes to you say,
 24 right at the end: "I've had to kill a few of the animals for
 25 sustenance, I have made quite a mess, there is blood and

[Page 843]

1 DEUTERS - SHERBORNE
 2 animal tracks everywhere." So, again, serious or joke?
 3 A. Joke.
 4 Q. Is this the kind of thing that Mr. Depp would write in the
 5 communications between you and him?
 6 A. Now and then. I mean, it was not every day, but now and then,
 7 yes.
 8 Q. I think you said exaggerated and extravagances and so on?
 9 A. Yes.
 10 Q. Can I turn to what happened on the plane. I am not going to
 11 go back through everything, because you gave very long and
 12 detailed responses. You describe what you saw. Let me see if
 13 I can just take this very quickly. You said, he was in his
 14 seat, he was quite low in his mood, he was quite introverted?
 15 A. Yes.
 16 Q. You described he was hemmed in, because of the geography of
 17 the seat?
 18 A. Yes.
 19 Q. You have said he was writing in his notebook or drawing?
 20 A. Writing, drawing, yes.
 21 Q. And there came a point where you were aware that Ms. Heard and
 22 he were arguing?
 23 A. Yes.
 24 Q. And you said that Ms. Heard stood up?
 25 A. Yes.

[Page 844]

1 DEUTERS - SHERBORNE
 2 Q. I think Ms. Wass said, she turned round and gave her back and
 3 you said no, she was to her side?
 4 A. Yes, I think she had her back to us, but her side to Johnny.
 5 Q. Her side to Mr. Depp?
 6 A. Yes.
 7 Q. You said it was at that point when she was standing up,
 8 presumably, arguing still with him?
 9 A. Yes, I think so.
 10 Q. You said his leg raised up?
 11 A. Yes.
 12 Q. You said very slowly?
 13 A. Yes, very slowly.
 14 Q. And to be fair, you said you could not tell whether there was
 15 any contact or not?
 16 A. No, because if I think about it, sort of where I was sat,
 17 I had Keenan Wyatt directly in front of me, and that is where
 18 it would have been. I remember the leg coming up very slowly,
 19 because of the angle, the restrictions of where he was.
 20 Q. I understand. What was Ms. Heard's reaction when this
 21 happened, do you remember?
 22 A. Yes. It was not positive. She was, you know, she reacted and
 23 I remember her using the word "kicked" and saying to everybody
 24 else on the plane, "Did you see him kick me?"
 25 Q. When you say it was not positive, I understand ----

[Page 845]

1 DEUTERS - SHERBORNE

2 A. Sorry.

3 Q. --- can you just explain, was her reaction mild, was it

4 moderate, was she quite angry, what was it?

5 A. Moderate to angry.

6 Q. And did you and Mr. Judge just do nothing when this happened?

7 A. Absolutely not. We obviously saw at that point the argument

8 had got to a stage where, you know, it was necessary to

9 intervene. You know, so myself and Jerry and Keenan, all

10 three of us did, and I think it was Jerry, Mr. Judge,

11 Mr. Wyatt, I think, went to Amber, particularly Mr. Wyatt,

12 I believe, and I sat with Mr. Depp for a minute, yes.

13 Q. What did you think about, what did you feel about her reaction

14 to what you had seen?

15 A. I remember thinking it was very much over the top, but I also

16 remembered thinking that, you know, Johnny was not in any way

17 engaging and that had upset her; so, you know, I felt for her

18 as well.

19 Q. His response, when she was arguing, was to not engage at all,

20 and this would make her angry?

21 A. I mean, as I witnessed, as I recalled, yes, that is precisely

22 that.

23 Q. Is that a unique way for you to have seen them argue, or was

24 that a common way they argued?

25 A. I very rarely saw them argue, I had only witnessed the

[Page 846]

1 DEUTERS - SHERBORNE

2 aftermath.

3 Q. Now, having seen the text that Ms. Wass took you to, I am not

4 going to take you back through them, do you in any way change

5 your recollection of events of what happened on the plane?

6 A. No.

7 Q. You explained that you had a conversation with Mr. Depp about

8 getting in contact with Ms. Heard after this happened?

9 A. Yes.

10 Q. What, if anything, did he ask you to do? Can you explain in a

11 little bit of detail?

12 A. Yes. I mean, as I said, you know, occasionally, more than

13 occasionally, put into the middle of these situations, I did

14 not really appreciate it, to be quite honest, I did not feel

15 like it was my job, but I wanted to help. I wanted to help

16 him because I know he loved her, and on occasion I wanted to

17 help her too. I felt that goodwill was leaned upon on

18 occasion. But, you know, I found myself in that position and,

19 as I said, I found myself in that similar position throughout

20 my life, it is not rare.

21 Q. Slow down a second. You said you found yourself in that

22 position a lot of your life. Can you just explain that a

23 little bit?

24 A. Sure. The middle man. The one, you know, particularly with

25 friends, certainly with family, but friends very much so, and

[Page 847]

1 DEUTERS - SHERBORNE

2 at work, just the middle person, the sort of person that gets

3 drawn in to sort of mediate, placate.

4 Q. Mediate and placate?

5 A. Yes.

6 MR. JUSTICE NICOL: You are talking here about your experience of

7 life generally, rather than specifically about Ms. Heard and

8 Mr. Depp.

9 THE WITNESS: Yes. Yes. That is a general comment, yes.

10 MR. SHERBORNE: Did it not apply to Ms. Heard and Mr. Depp as

11 well?

12 THE WITNESS: No no, it did apply to them as well; yes, certainly.

13 Q. You mentioned in response to Ms. Wass that you were yourself a

14 victim of domestic abuse?

15 A. Yes.

16 Q. I am not going to press you, unless you feel comfortable, but

17 can you explain why you said that was something that in this

18 role as an intermediary ---

19 A. Yes, obviously I have had time to think about it a lot and

20 when I think about it, I do not do well with conflict and

21 I never have, and that that I went through many years ago now,

22 I probably had this in me before then, but nevertheless more

23 so since and thereafter. I do not do well with conflict.

24 I do not run away from it. I do engage, but when engage my

25 instinct is always to nullify and deflate, never to enrage.

[Page 848]

1 DEUTERS - SHERBORNE

2 It is just instinctive, that is where I go, yes.

3 Q. In asking you to contact Ms. Heard, what did Mr. Depp want you

4 to achieve by those texts?

5 A. Quite simple, placate her. You know, basically, deflate the

6 situation. Create the peace. You know, get her on side, and

7 do whatever you need to do, type whatever you need to type.

8 He did not give me a script to type, it was not that specific.

9 It was just a blanket instruction -- not instruction, request

10 I would describe it as.

11 Q. Your brief was to try and placate?

12 A. Yes, again, that was not my job. I did this, it was just to

13 help.

14 Q. To help Mr. Depp, Ms. Heard or both of them?

15 A. Both.

16 Q. Were you instructed by Mr. Depp to get Ms. Heard to see

17 reason?

18 A. I do not know if I would go that far.

19 Q. Were you instructed to convince her about the truth of what

20 happened?

21 A. No.

22 Q. Now, obviously, we have the benefit of hindsight, sitting in

23 this court. But what did you believe, Mr. Deuters, at the

24 time, this time, what did you believe was the best way to

25 achieve your role of placating?

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1 DEUTERS - SHERBORNE

2 A. I had to simply -- well, I mean, I suppose specifically in

3 this instance, I used a word, the adjective that she used,

4 as ----

5 Q. You mean kicked?

6 A. Yes, kicked. I used that word as, yes, a method, I suppose,

7 that was the method that came -- obviously this is some time

8 ago now, I cannot remember my exact thinking, but yes, looking

9 back at it with the benefit of hindsight, I simply used a word

10 that she had used to me, because I thought that was a word she

11 would agree with, would get the desired effect.

12 Q. In your experience of Ms. Heard, do you think she would have

13 been placated had you told her that she was wrong about what

14 had happened in the incident?

15 A. No. I would not have taken that route.

16 Q. Do you think you would have made things better for Mr. Depp if

17 you has contradicted her?

18 A. No, definitely not.

19 MR. JUSTICE NICOL: Just a minute. (Pause)

20 MR. SHERBORNE: (To the witness) You said in answer to Ms. Wass,

21 if had you done that, you were afraid things would go south,

22 was the phrase you used?

23 THE WITNESS: Yes.

24 Q. Mr. Deuters, given what you knew of Mr. Depp and he had said

25 to you, how would Mr. Depp have felt if things had gone south,

[Page 850]

1 DEUTERS - SHERBORNE

2 because of what you had said?

3 A. He would not have been very happy with the situation, and,

4 yes.

5 MR. JUSTICE NICOL: Sorry, this is now about Mr. Depp's reaction

6 if things had gone south; is that the question?

7 MR. SHERBORNE: Well, Mr. Deuters had said in answer to Ms. Wass,

8 "Why did you not say he was just being playful?", and

9 Mr. Deuters said "Things would have gone south if I had."

10 I was asking him, given what Mr. Depp had asked him to do, if

11 the net result of telling her he was just being playful was

12 that things would have gone south, how would Mr. Depp have

13 reacted to that, and Mr. Deuters said he would not have been

14 very happy.

15 MR. JUSTICE NICOL: Thank you.

16 MR. SHERBORNE: (To the witness) I am not going to ask you anything

17 more. You have explained what you felt about her reaction and

18 so on. Can we move to the Bahamas. You were asked a few

19 questions. I think, to be fair to you, it is very easy when

20 you are sitting in the witness box to be asked questions and

21 just answer. You were asked about mushrooms. Can I just take

22 you to page 36. I think I am going to ask you a series of

23 questions about file 6 so can you just have that in front of

24 you and you put that one away? Thank you. If you turn to

25 page 36, there were some texts passing between -- I will wait

[Page 851]

1 DEUTERS - SHERBORNE

2 for his Lordship to clear the decks, so to speak.

3 MR. JUSTICE NICOL: Which page, please?

4 MR. SHERBORNE: It is page 36. Here you were shown an exchange

5 between what looks like Mr. Depp's phone -- do you see right

6 at the top of the page?

7 A. Yes.

8 Q. And Rocky Pennington's phone, so that is Amber's friend?

9 A. Yes.

10 Q. It is "Hey, just called you. Do you have any mushrooms?" This

11 is just before the Bahamas. "We are planning on cooking on

12 the island." That was you and so on, just going down through

13 the texts. Then you were taken to this one: "Do you know if

14 we can have Stephen contact someone to procure some

15 mushrooms?" You were quite mystified by that because you had

16 no idea. It was said to you this was Mr. Depp. Can I, just

17 to be fair to you, show you this. Do you have file 10, tab

18 147A. This should be 099. (Pause) At text number 5, in the

19 left-hand corner, do you see the same one: "Hey, just called

20 you. Do you have any mushrooms"?

21 A. What page is that?

22 Q. It should be 099 on the right-hand side. Do you have that?

23 Then, there should be the fifth text on that?

24 A. 099, yes.

25 Q. One up from the bottom, "Hey, just called you"?

[Page 852]

1 DEUTERS - SHERBORNE

2 A. Yes.

3 Q. "Do you have any mushrooms? We are planning cooking....", so

4 that is the same text we were looking at?

5 A. Yes, right.

6 Q. You will see again, same text, "In the drawer." There is one

7 at number 8, which looks like it comes from Mr. Depp's phone

8 to Rocky, "Yep, they are in the drawer of the kitchen island"?

9 A. Yes.

10 MR. JUSTICE NICOL: Sorry, this is message 8.

11 MR. SHERBORNE: I am sorry, my Lord: "Yep, they are in the drawer

12 of the kitchen island." Then 9, which is in that schedule we

13 were looking at, "Do you know if we can have Stephen contact

14 someone?" Again, this looks like it is coming from Mr. Depp.

15 Then, if you go down, you will see again more questions.

16 There is more talk about the mushrooms at number 14, for

17 example. "They are in the kitchen island in the top right

18 drawer." We have looked at this, but you were not here,

19 Mr. Deuters. At 17, this is a text coming from Mr. Depp's

20 phone to Rocky saying, "It is Amber and I always get what I

21 want."

22 A. Yes.

23 Q. It looks like this is actually an exchange between Amber Heard

24 using Mr. Depp's phone?

25 A. Yes.

[Page 853]

1 DEUTERS - SHERBORNE

2 Q. To be fair to you, when it was suggested that Mr. Depp was

3 asking you and therefore surely he knew you could have got

4 mushrooms, did you know where to get mushrooms?

5 A. No, definitely not.

6 Q. Thank you, Mr. Deuters. Just going back to file 6, page 37 --

7 yes, you can put that one away. I am grateful.

8 A. Yes.

9 Q. You were asked about, I think, the one text on page 36. You

10 were asked about that text there.

11 A. Yes.

12 Q. Can I just take you to the one that you were not shown on 37.

13 This is you to Mr. Depp; yes?

14 A. Yes. At the top of 37, yes.

15 Q. I am going to read bits of it out, not all of it, and you will

16 see why. I will stop at a point. "To be honest, I have

17 written this text a few times now and I am still not really

18 sure what to say." This is Mr. Depp?

19 A. Yes.

20 Q. "I suppose the short story is that you guys simply cannot

21 continue on in this manner...(reads to the words)... She loves

22 you and that is a part of who you are now." So, would you say

23 that that is a description that matches your assessment of how

24 they were being at that time?

25 A. Yes. Yes. The assessment being, yes, exactly, that they,

[Page 854]

1 DEUTERS - SHERBORNE

2 that he was obviously, well, smoking, sorry, I am not sure I

3 understand your question.

4 Q. Let me just show you. Was Ms. Heard being angry at his

5 behaviour?

6 A. Yes. Yes.

7 Q. And his behaviour was basically betraying his promises to her?

8 A. Yes. Yes.

9 Q. Can I then ask you a question. I probably do not need to take

10 you to it. Do you remember that photo we have all seen of

11 Mr. Depp with the ice cream falling over him?

12 A. Yes.

13 Q. I appreciate it was put to you in a certain way, but just

14 standing back for a second, do you actually know, Mr. Deuters,

15 whether that was Mr. Depp having passed out because he was on

16 drink and drugs or whether he had fallen asleep because he was

17 exhausted?

18 A. No, I have no idea. I was not there.

19 Q. Thank you. Just asking you then about Australia, just one or

20 two questions, you were asked about alcohol in the house?

21 A. Yes.

22 Q. You were asked, if there was alcohol in the house, whether

23 Mr. Depp would have ordered it. I think you originally said

24 that there was a private bar there so it may have been

25 pre-stocked?

[Page 855]

1 DEUTERS - SHERBORNE

2 A. Yes.

3 Q. But I am going to ask you this. Mr. Depp may have ordered the

4 alcohol, but do you know whether he ordered it for himself or

5 for Ms. Heard?

6 A. It would have been ordered for himself, Ms. Heard and anyone

7 that came to visit. You know, we had meetings there. We all,

8 you know, on occasion we would be there. So, it was not,

9 "Yes, this is my stash."

10 Q. Can I ask you the question if there were times when Mr. Depp

11 was not drinking, would he refuse to let anyone else drink

12 around him?

13 A. Not to my recollection.

14 Q. You were taken to a text on page 59. We are still in file 6.

15 Again, just to be fair to you on timing, because it is quite

16 easy to get tied up sometimes if dates are put to you that are

17 not the right dates, on page 59, two texts up, Ms. Wass showed

18 you this text and said, "Ah, but you are saying you are at the

19 house" ----

20 MR. JUSTICE NICOL: Just a minute. 59.

21 MR. SHERBORNE: My Lord, yes, page 59. It is two texts up. We

22 have two identical texts at the bottom of 59. Do you see?

23 A. Yes.

24 Q. This is you to Christi, Mr. Depp's sister: "Hi C, not sure

25 how much you are aware of right now, but I am at the house

[Page 856]

1 DEUTERS - SHERBORNE

2 with Kipper and Debbie." It was suggested to you that somehow

3 you were mistaken because you said you had not been to the

4 house, but if we look to the right, we see the date of this

5 text is 7th March?

6 A. Yes.

7 Q. Was that before or after the incident where Mr. Depp had to go

8 to hospital?

9 A. From what I recall, that was the day before.

10 Q. Before. Thank you. Mr. Deuters, you were read a number of

11 texts and passages about how Ms. Heard wrote to herself about

12 her relationship and events and you described the events as

13 having been "embellished". I think that was the word you

14 used. In terms of how she described the relationship, how

15 would you describe, in a word or two, as far as you witnessed,

16 the relationship between Ms. Heard and Mr. Depp? How would

17 you describe it, in a few words?

18 A. Not great. I think they were two people that were in love

19 with each other that, you know, should not have been together.

20 Q. Did you, Mr. Deuters, at any stage, in the four years that

21 they were together, did you see Mr. Depp hit Ms. Heard at any

22 time?

23 A. No.

24 Q. Did you see him act violently towards Ms. Heard at any time?

25 A. No.

[Page 857]

1 DEUTERS - SHERBORNE
 2 Q. If you had seen him do so, would you have just stood by and
 3 let it happen?
 4 A. Absolutely not.
 5 Q. You see, the suggestion, Mr. Deuters, is that Mr. Depp
 6 surrounds himself with people who never stand up to him, who
 7 are too scared to. Have you ever stood up to Mr. Depp in your
 8 time together?
 9 A. Yes, I would say there have been a few times.
 10 Q. Can you give us an example of one?
 11 A. Yes, I certainly can. I mean, there was a number of times
 12 where we would confront him about his health and speak to him
 13 about that, but I do remember a specific episode, a very
 14 specific episode. It would have been April 2015, so it was
 15 after the finger incident, after all that. We were in
 16 Los Angeles and I was asked by a producers of Pirates 5 to ask
 17 Johnny to come back early. Nobody else would do that job.
 18 Q. Just help us, Mr. Deuters ----
 19 A. I do not know why. I do not know why, but nobody else would
 20 do it, so they asked me to do it, and I said yes because
 21 I thought it was the right thing to do. To be specific, we
 22 were in Los Angeles and they were desperate to restart
 23 production so they basically asked Johnny to come back a few
 24 days early. Johnny did not want to do so. Sorry, to go back,
 25 they asked me to go and sit down with Johnny and ask him to go

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1 DEUTERS - SHERBORNE
 2 back to Australia a few days earlier than had been previously
 3 agreed.
 4 MR. JUSTICE NICOL: Go back to Australia?
 5 A. Yes, go back to Australia, return to Australia from
 6 Los Angeles. So I sat down with Johnny and I asked him to do
 7 that. He respectfully said no. Amber, I think, was in New
 8 York, I am not sure, but she was not in Los Angeles. She was
 9 coming back in a few days' time and he wanted to wait for her
 10 to return. I think she had asked him to and he wanted to wait
 11 as well so we did not come to -- we had not an argument, but a
 12 disagreement on the fact. I was irritated because I thought
 13 we needed to go back. I thought that was the right thing to
 14 do. I left the apartment that day and a day or so later,
 15 myself and my wife travelled without them separately,
 16 commercially, to Australia to wait for them there. Yes, I
 17 recall that very clearly and it was a few days later that they
 18 appeared in Australia with the dogs.
 19 MR. SHERBORNE: You said that you were irritated because you
 20 thought it was the right thing to do.
 21 A. Yes.
 22 Q. Did you tell Mr. Depp you thought it was the right thing to
 23 do?
 24 A. Certainly, yes.
 25 Q. Rather than just do what he did, you left him there?

[Page 859]

1 DEUTERS - SHERBORNE
 2 A. Yes.
 3 Q. Mr. Deuters, Ms. Wass suggested to you that, on a number of
 4 occasions, you were not telling the truth. Do you understand?
 5 A. Yes.
 6 Q. Are you lying under oath?
 7 A. No.
 8 Q. It was suggested by Ms. Wass that your job, your livelihood,
 9 everything, depends on Mr. Depp. Are you lying under oath to
 10 save your job and your livelihood, Mr. Deuters?
 11 A. No.
 12 MR. SHERBORNE: Thank you. I have no further questions. I do not
 13 know if your Lordship has any questions of Mr. Deuters?
 14 MR. JUSTICE NICOL: No, I do not. Mr. Deuters, thank you for
 15 coming to give your evidence. You are now released as far as
 16 the court is concerned.
 17 THE WITNESS: Thank you, your Honour.
 18 (The witness withdrew)
 19 MR. JUSTICE NICOL: Good. Where next?
 20 MR. SHERBORNE: Your Lordship, if you give me two minutes, I can
 21 turn round and ask. I do not know what has been happening.
 22 (Pause) I am told that both Mr. White and Ms. Esparza are
 23 there in Los Angeles, waiting to answer questions. Ideally,
 24 I would like both of them to be dealt with today. Ms. Wass is
 25 nodding and saying no problem. So, I do not know, Mr. White,

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1 DEUTERS - SHERBORNE
 2 I think, was technically meant to go first so perhaps we can
 3 deal with in that order.
 4 MR. JUSTICE NICOL: I will rise while the link is established.
 5 MR. SHERBORNE: I am grateful.
 6 (A short break)
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 8 MR. JUSTICE NICOL: Yes, Mr. Sherborne.
 9 MR. SHERBORNE: My Lord, can I call our next witness, Mr. White,
 10 please.
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[Page 861]

1 WHITE
 2 MR. EDWARD WHITE, SWORN
 3 EXAMINED BY MR. SHERBORNE
 4 (VIA TV LINK)
 5 MR. JUSTICE NICOL: Mr. White, before we start, can I thank you
 6 for coming to give evidence in this trial and thank you also
 7 for doing so at what I imagine is an uncomfortable hour in the
 8 morning in your time.
 9 THE WITNESS: You are quite welcome, your Honour.
 10 MR. JUSTICE NICOL: Thank you. Yes, Mr. Sherborne.
 11 MR. SHERBORNE: Mr. White, I am counsel on behalf of Mr. Depp. I
 12 do not know if you can see me. Can I just ask you this before
 13 I take you to your statement? Mr. White, am I right in
 14 thinking that when you see the courtroom, you do not see his
 15 Lordship, but you see me and you see Ms. Wass to my right over
 16 here, the way my hand is directing, who is counsel on behalf
 17 of News Group Newspapers; am I right? You are looking up, but
 18 I am just trying to establish what you are seeing in front of
 19 you.
 20 MR. JUSTICE NICOL: I think the camera is now moving.
 21 MR. SHERBORNE: I think your vision is being changed.
 22 THE WITNESS: What I am seeing now is a gentleman with a wig on,
 23 but I am not sure which one is Mr. Sherborne.
 24 MR. SHERBORNE: I think I am the gentleman with the wig on.
 25 THE WITNESS: Thank you. Wonderful.

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1 WHITE - SHERBORNE
 2 MR. SHERBORNE: I think we have oriented ourselves. I am not sure
 3 you do see his Lordship, but just so that his Lordship
 4 understands that, I think the view is this.
 5 MR. JUSTICE NICOL: It is all right. I understand.
 6 MR. SHERBORNE: It will be a God-like voice that you hear that is
 7 his Lordship. Can I just ask your full name, please?
 8 A. Edward Leon White.
 9 Q. Hopefully you do have -- I think I can see them to your left
 10 -- a bank of files?
 11 A. That is correct.
 12 Q. And if you could just find the one that is marked number 2 --
 13 I do not think they are colour-coded -- if you can just take
 14 that out, hopefully there will be a series of tabs and there
 15 should be one marked number 45.
 16 A. I have found the exhibit you are referring to.
 17 Q. It should say "First witness statement of Edward White"; is
 18 that right?
 19 A. That is correct.
 20 Q. If you could just turn over the page, you should see on the
 21 right-hand side, if your bundle is the same as mine, you
 22 should find your signature. Can I just ask you to confirm, is
 23 that your signature?
 24 A. I have found the signature and in fact it is my signature.
 25 Q. I am grateful. There is just one last question. Mr. White,

[Page 863]

1 WHITE - SHERBORNE
 2 can you confirm that the facts that are set out in this
 3 witness statement are true?
 4 A. I have reviewed this witness statement before and this is a
 5 correct and factual statement.
 6 MR. SHERBORNE: I am grateful. If you just wait there, Mr. White,
 7 Ms. Wass, who is representing the defendants, may have some
 8 questions for you. Thank you very much.
 9 MR. JUSTICE NICOL: Yes. Ms. Wass.
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1 WHITE
 2 CROSS-EXAMINED BY MS. WASS
 3 MS. WASS: Mr. White, can you hear me all right?
 4 A. Yes, I can.
 5 Q. I want to ask you, please, about certain things in your
 6 witness statement and certain things not in your witness
 7 statement. Do you understand?
 8 A. Yes.
 9 Q. As far as your witness statement is concerned, you have said
 10 in that that you had a meeting with Mr. Depp on 21st April
 11 2016 in which some very important business matters were
 12 discussed with Mr. Depp.
 13 A. That is correct.
 14 Q. And Mr. Depp's sister was present?
 15 A. Yes.
 16 Q. As were other individuals. It was a formal meeting, do you
 17 agree?
 18 A. It was a formal meeting.
 19 Q. It started at 7.30 and lasted between one and a half and two
 20 hours?
 21 A. Could you repeat the time, please?
 22 Q. It started at approximately 7.30 p.m. and lasted between one
 23 and a half and two hours?
 24 A. That is correct.
 25 Q. Right, which would have taken us to 9.00-9.30 p.m.?

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1 WHITE - WASS
 2 A. Correct.
 3 Q. Now, Mr. Depp was given some catastrophic news about his
 4 business?
 5 A. That is correct.
 6 Q. Which radically altered the state of his financial health?
 7 A. I do not think it altered his financial position; it clarified
 8 his financial position.
 9 Q. You are absolutely right. It revealed to him that the state
 10 of his financial health was considerably worse than he
 11 previously believed it to be?
 12 A. I am not certain what the origin of your question is, but he
 13 was informed of his financial position during the course of
 14 the meeting.
 15 Q. Mr. Depp has told us that it became apparent to him at that
 16 meeting that tax had not been paid on his behalf for several
 17 years?
 18 A. His statement is correct.
 19 Q. And that meant he had a tax bill of literally millions?
 20 A. Can you state that again, please, I did not understand your
 21 question.
 22 Q. What that meant was that he owed the IRS millions of back tax?
 23 A. That is correct. He did have delinquent liabilities of
 24 (unclear).
 25 Q. It was also suggested that some members of staff who worked

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1 WHITE - WASS
 2 for him had effectively defrauded him; is that right? That
 3 was the news you were giving him.
 4 A. Can you repeat that statement again, please? I am having
 5 some difficulty in understanding you.
 6 Q. Was Mr. Depp also told at the meeting that certain people who
 7 were supposed to be working in his best interests had in fact
 8 defrauded him?
 9 A. That is correct. They felt that the representation of his
 10 (unclear) management firm was inadequate.
 11 Q. Although this financial news was clearly bad, Mr. Depp's
 12 income remained extremely high and healthy, did it not?
 13 A. For periods of time, he was enjoying substantial income if
 14 that is your enquiry.
 15 Q. I am sorry, I did not understand because of the sounds. Could
 16 you repeat that for me?
 17 A. He has continued to enjoy substantial income for his talent(?)
 18 and his services.
 19 Q. In the tax year coming up to that meeting on 21st April, would
 20 you agree that his income was in the order of £60 million
 21 pounds after tax?
 22 MR. JUSTICE NICOL: \$60 million.
 23 MS. WASS: Dollars, forgive me. \$60 million, Mr. White, sorry.
 24 A. I do not recall the amount of his income for 2015 if that is
 25 the nature of your enquiry.

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1 WHITE - WASS
 2 Q. Is it in the order of the figure that I have just told you?
 3 A. I do not recall ----
 4 Q. Can you find out?
 5 A. ---- the amount of the income.
 6 Q. Are you able ----
 7 A. I certainly could find it out.
 8 Q. What I am going to ask, Mr. White, is that you do find out and
 9 provide, not by having to come back to give evidence, but
 10 provide the figure of Mr. Depp's after-tax income between
 11 February 2015 and May 2016. Would you be able to do that?
 12 MR. SHERBORNE: My Lord, can I ----
 13 THE WITNESS: Yes, I would.
 14 MR. SHERBORNE: Can I ask why he is being asked to do that. Why
 15 he was not asked to do that before, and what this really has
 16 to do with anything.
 17 MR. JUSTICE NICOL: Well, Mr. Sherborne, the witness has said that
 18 he is able to provide that information, but I will hear
 19 argument after the witness has finished as to whether he
 20 should provide the information.
 21 MR. SHERBORNE: I am grateful, my Lord.
 22 MR. JUSTICE NICOL: Mr. White, again, can you hear me?
 23 THE WITNESS: Yes, your Honour, I can.
 24 MR. JUSTICE NICOL: There is an issue that has been raised by
 25 Mr. Sherborne, for Mr. Depp, as to whether you should provide

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1 WHITE - WASS
 2 that information. I will have to make a decision about that,
 3 but I am very grateful to you for your offer, if I decide that
 4 you should provide it, to do so.
 5 THE WITNESS: Fine, your Honour. If you consider that, if you are
 6 asking for information it would be helpful (unclear) the
 7 initial liabilities for that time period and the ultimate
 8 liabilities in that time period.
 9 MR. JUSTICE NICOL: Thank you. Yes, Ms. Wass.
 10 MS. WASS: Mr. White, you remained Mr. Depp's accountant during
 11 the time of his divorce, did you not?
 12 THE WITNESS: Yes, I did.
 13 Q. And you were aware, presumably, that in the absence of a
 14 pre-nup or post nuptial agreement in the State of California,
 15 a spouse is entitled to 50% of the wealth of the spouse who is
 16 being divorced, of the money that was earned during the course
 17 of the marriage.
 18 A. That is a partial statement. The whole statement would be
 19 that it is entitled to look at the net income after
 20 consideration has been taken into account and I would make no
 21 (unclear) the liabilities in the period in question which
 22 should be increased, such that it was actually a reduction in
 23 his net worth during that period of time.
 24 Q. But this is his income, it is the spouse's income that is the
 25 starting point of the calculation; do you agree?

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<p>1 WHITE - WASS</p> <p>2 A. No. I agree that all financial factors would be considered</p> <p>3 and this would be one of the elements. But, as I stated</p> <p>4 earlier, the ultimate test is the incremental increase or</p> <p>5 decrease in the net worth of the party.</p> <p>6 Q. What I am going to put to you, Mr. White, is that Ms. Heard</p> <p>7 had a settlement of \$7 million, as part of the divorce</p> <p>8 settlement, does that sound a familiar figure to you?</p> <p>9 A. Yes. But it was only partially correct.</p> <p>10 Q. Finish the statement, then, for me, please?</p> <p>11 A. I am sorry, ma'am, can you state that again please?</p> <p>12 Q. You suggested, when I said that the financial settlement for</p> <p>13 Ms. Heard was \$7 million that I had said something that was</p> <p>14 partial?</p> <p>15 A. Yes, you did.</p> <p>16 Q. You ----</p> <p>17 A. The whole settlement was, if you would like for me to tell you</p> <p>18 what I recall the total settlement to be, I would be pleased</p> <p>19 to share that with you.</p> <p>20 Q. Yes, please.</p> <p>21 A. She did in fact receive \$7 million of tax-free income. She</p> <p>22 also received the full satisfaction of her legal fees, which</p> <p>23 was approximately 525,000 and she was relieved of all her</p> <p>24 liabilities to which she was subject.</p> <p>25 MR. JUSTICE NICOL: Just a minute. (Pause) Thank you.</p>	<p>1 WHITE - WASS</p> <p>2 first.</p> <p>3 MS. WASS: All right. (To the witness) Do you know that she</p> <p>4 agreed, Ms. Heard agreed to pledge her divorce settlement</p> <p>5 money to two separate charities, to donate to two separate</p> <p>6 charities; is that within your knowledge?</p> <p>7 A. It is my recollection that she represented she would in fact</p> <p>8 make contributions to these two organisations. During that</p> <p>9 time I suggested to her she did not need non-taxable income if</p> <p>10 she is going to have a corresponding tax deduction, but she</p> <p>11 insisted on it being proceeds being free of taxation.</p> <p>12 Q. Did you make enquiries to check whether she had indeed made</p> <p>13 donations to these particular charities?</p> <p>14 A. On occasion I asked the question, were the contributions made</p> <p>15 and I never received a response.</p> <p>16 Q. Did you make the enquiry of the charities themselves?</p> <p>17 A. No.</p> <p>18 Q. Out of the 7 million, do you remember that 200,000 was</p> <p>19 supposed to have been paid by Mr. Depp directly to the two</p> <p>20 charities?</p> <p>21 A. Yes, I do; and I remember those payments.</p> <p>22 MR. JUSTICE NICOL: Just a minute. Yes.</p> <p>23 MS. WASS: My Lord, subject to the legal argument, that is as far</p> <p>24 as I want to take the questioning of this witness.</p> <p>25 MR. JUSTICE NICOL: Good. Thank you. Mr. Sherborne, there will</p>
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<p>1 WHITE - WASS</p> <p>2 MS. WASS: So, legal fees and bills being paid; all right?</p> <p>3 THE WITNESS: They were paid on her behalf.</p> <p>4 Q. What did that amount to, the legal fees and the ----</p> <p>5 A. The legal fees were approximately \$525,000, that was in</p> <p>6 addition to the 7 million. And there was a very substantial</p> <p>7 increase in liabilities during the period of the marriage and</p> <p>8 she was relieved of those legal obligations.</p> <p>9 Q. What were the liabilities that she was relieved of, that is</p> <p>10 what I am asking you, what did that amount to?</p> <p>11 A. A very substantial amount. I do not have that information</p> <p>12 available to me at this time.</p> <p>13 Q. Again, would you be able to provide that, subject to any legal</p> <p>14 argument that the judge in this court has to determine?</p> <p>15 A. I could provide you with historical reconstruction and an</p> <p>16 estimation, but I think you will find that she was relieved of</p> <p>17 many millions of dollars of liabilities.</p> <p>18 Q. Again, I am going to put you to proof on that, if I may; you</p> <p>19 understand that?</p> <p>20 A. Fine.</p> <p>21 Q. Now, Ms. Heard publicly stated, after the settlement, that she</p> <p>22 wanted to pledge the amount that she had received from</p> <p>23 Mr. Depp, so the \$7 million, to two charities. Do you agree?</p> <p>24 MR. JUSTICE NICOL: Well, I do not know that Mr. White is able to</p> <p>25 answer that. So, perhaps you could ask him that question</p>	<p>1 WHITE - WASS</p> <p>2 be the opportunity for you to have the argument, but other</p> <p>3 than that, is there any re-examination that you have?</p> <p>4 MR. SHERBORNE: My Lord, no, I do not have any questions for</p> <p>5 Mr. White.</p> <p>6 MR. JUSTICE NICOL: Then I will say, Mr. White, can I repeat the</p> <p>7 court's thanks both for you giving evidence at all, and doing</p> <p>8 so at such an uncomfortable time.</p> <p>9 THE WITNESS: That is very thoughtful of you, your Honour. It is</p> <p>10 indeed my pleasure to meet you, at least in this manner and to</p> <p>11 be responsible.</p> <p>12 MR. JUSTICE NICOL: That brings your evidence to an end and you</p> <p>13 are now free to go. Thank you very much indeed.</p> <p>14 (The witness withdrew)</p> <p>15</p> <p>16 MR. JUSTICE NICOL: There is another witness and I do not know if</p> <p>17 the other witness is in the same room, but I am going to rise</p> <p>18 for a few minutes. I am going to go out of court for a few</p> <p>19 minutes, while hopefully that other witness is found. Thank</p> <p>20 you again, Mr. White.</p> <p>21 (A short break)</p> <p>22</p> <p>23 MR. JUSTICE NICOL: Yes, Mr. Sherborne.</p> <p>24 MR. SHERBORNE: My Lord, can I call our next witness, Ms. Esparza.</p> <p>25</p>

[45] (Pages 869 to 872)

[Page 873]

1 ESPARZA
2 MS. TRINITY ESPARZA
3 (via TV link)
4 MR. JUSTICE NICOL: Ms. Esparza, can you hear me all right?
5 THE WITNESS: Yes.
6 MR. JUSTICE NICOL: I want to say, first of all, thank you for
7 coming to give evidence for this trial. Can I then say thank
8 you, particularly, because, as I understand it, it must be an
9 uncomfortable time in the morning for you in Los Angeles.
10 THE WITNESS: Thank you.
11 MR. JUSTICE NICOL: All right. Yes. Now, Mr. Sherborne.
12 MR. SHERBORNE: My Lord, if Ms. Esparza can be sworn in.
13 MR. JUSTICE NICOL: Yes. Ms. Esparza, do you wish to affirm or do
14 you wish to swear to tell the truth on the bible? You can do
15 either.
16 THE WITNESS: I will swear to tell the truth on the bible.
17 MR. JUSTICE NICOL: Do you have a bible in front of you?
18 THE WITNESS: I do, your Honour.
19 MR. JUSTICE NICOL: If you could hold that while the usher goes
20 through the oath with you.
21 MS. TRINITY ESPARZA, SWORN
22 EXAMINED BY MR. SHERBORNE
23 MR. JUSTICE NICOL: Thank you, Ms. Esparza. You can put the bible
24 down now. Thank you. Yes, Mr. Sherborne.
25 MR. SHERBORNE: Ms. Esparza, I am counsel on behalf of Mr. Depp,

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1 ESPARZA - SHERBORNE
2 and can I ask you to give your full name to the court, please.
3 A. Yes. It is Trinity Corinne Esparza.
4 Q. Thank you. You should see to your left-hand side a very
5 impressive array of files. Do you have them?
6 A. Yes.
7 Q. Can I ask you to find the file which should have number 2
8 marked on it. In that bundle, there should be a tab numbered
9 43. Can you find a document entitled "First witness statement
10 of Trinity Esparza".
11 A. Correct.
12 Q. Can I then ask you to turn to the back of that document, and
13 it should be a page that is numbered on the bottom right-hand
14 side, as D102.
15 A. That is correct.
16 Q. Can you confirm, is that your signature there?
17 A. Yes.
18 Q. A final question, Ms. Esparza, can you confirm that this
19 witness statement, that the facts stated in it are true?
20 A. Yes.
21 MR. SHERBORNE: If you wait there, Ms. Wass, who represents the
22 defendants in this action, may have some questions for you.
23
24
25

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1 ESPARZA
2 CROSS-EXAMINED BY MS. WASS
3 Q. Ms. Esparza, you are the owner of a company called Try
4 Provide, which provides a concierge services and staffing for
5 condominium complexes; is that right?
6 A. Yes.
7 Q. That is not only the Eastern Columbia Building, but others as
8 well?
9 A. No.
10 Q. Just the Eastern Columbia Building; is that right?
11 A. Yes.
12 Q. All right. Thank you. Now, you were aware of, I want to ask
13 you about two particular women who lived in that building in
14 2016 and, indeed, before then. You know Amber Heard, do you
15 not?
16 A. Yes, I do.
17 Q. You know what she looks like?
18 A. Yes.
19 Q. You are not a friend, you have an entirely professional, or
20 you had an entirely professional relationship with her; yes?
21 A. That is correct.
22 Q. You would greet her if she passed you in, passed the reception
23 of the building?
24 A. Yes.
25 Q. And perhaps very occasionally would interact if she had a

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1 ESPARZA - WASS
2 query with reception; yes?
3 A. That is correct.
4 Q. That was the extent of your relationship?
5 A. Yes.
6 Q. Ms. Heard had a sister called Whitney; do you know that?
7 A. Yes.
8 Q. And Whitney (Hernandez her name is now) actually lived in the
9 Eastern Columbia Building earlier in 2015; do you agree?
10 A. Yes.
11 Q. She was a regular visitor even after she moved out of that
12 building?
13 A. Yes.
14 Q. And again, you know her by sight?
15 A. Yes.
16 Q. Similar in appearance to Ms. Amber Heard, tall, blonde, slim,
17 very attractive?
18 A. Yes.
19 MR. JUSTICE NICOL: Sorry, Ms. Esparza, do you agree that she is
20 similar in appearance to Ms. Amber Heard?
21 THE WITNESS: They are tall and blonde, they are sisters, they
22 look like ----
23 MS. WASS: They look like sisters, and the description ----
24 A. I suppose so.
25 Q. And the description I have given to you applies to each of

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1 ESPARZA - WASS
2 them, they are tall, slim, blonde and attractive?
3 A. Yes; but they are quite different people.
4 Q. I understand what you are saying. You had Whitney's telephone
5 number, did you not, her mobile telephone number?
6 A. Yes.
7 Q. You did not have Amber Heard's telephone number?
8 A. When she first moved into the building we did not, but
9 (unclear due to distortion) -- have a phone number for her.
10 MR. JUSTICE NICOL: I am sorry, your sound broke up then, can you
11 repeat your answer, please, Ms. Esparza.
12 THE WITNESS: I believe we have her phone number, she had, I think
13 it changed a couple of times, but in -- I remember at one
14 point, when she had called the front desk, I think the
15 (unclear), so we did have a way of connecting with her.
16 MS. WASS: All right. More often than not, you would telephone
17 Whitney if you wanted to get a message to Ms. Amber Heard?
18 THE WITNESS: In the beginning of 2015, I believe that was
19 correct. We also could communicate with Laura Divenere as
20 well if we could not reach her.
21 MR. JUSTICE NICOL: Just go a bit slower, please. Just go a
22 little slower, please, Ms. Esparza. I am writing a note of
23 your evidence, so you have to take it a little bit slowly.
24 THE WITNESS: Certainly. In 2015, front desk staff would contact
25 Whitney or Laura Divenere to get in contact with her (unclear)

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1 ESPARZA - WASS
2 she had contacted us, but she often contacted us herself. It
3 was some time ago, so I cannot recall correctly precisely, but
4 I know that she would call us and we would communicate with
5 her (unclear) and via e-mail.
6 MS. WASS: On 27th May 2016, were you contacted by members of
7 Mr. Depp's security who asked for security footage, the CCTV
8 footage of the apartment building?
9 THE WITNESS: No.
10 Q. Are you sure about that?
11 A. I do not think so. On the 27th, no -- sorry, are you talking
12 about -- who are you referring to?
13 Q. Let me take it in stages. I am going to suggest that on
14 27th May 2016, you or people working for you were contacted by
15 people working on behalf of Mr. Depp; is that correct or not?
16 A. I do not know, I do not know about the exact dates, but around
17 that time, his attorneys did request video footage.
18 Q. Yes, I am going to suggest that was on 27th May.
19 A. Okay.
20 Q. If it helps you, what you said in your witness statement was:
21 "Soon after Ms. Heard went public with her abuse allegations,
22 on 27th May Mr. Depp's lawyers subpoenaed building personnel
23 and the security footage"; yes?
24 A. That sounds good.
25 Q. "A pair of Mr. Depp's lawyers came to the Eastern Columbia

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1 ESPARZA - WASS
2 Building to go through our camera footage"; yes.
3 A. Yes.
4 Q. Now, on 27th May, you saw Ms. Heard at your desk, you were
5 working at the desk at the Eastern Columbia Building?
6 A. That is correct.
7 Q. And you noticed for the first time that she had a red mark
8 underneath her right eye?
9 A. That is correct. And I had seen her previously that week and
10 she did not have that.
11 Q. Is it not more accurate to say you had seen her previously
12 that week and you did not notice any marks on her?
13 A. That is not accurate. I saw her very clearly.
14 Q. I am going to ask you, please, to look at a bundle, there are
15 some next to you, bundle 6, can you find that to your left.
16 A. Yes.
17 Q. Can you go to divider 148E. So we can get our ----
18 MR. JUSTICE NICOL: Just wait until Ms. Esparza has the bundle. -
19 (Pause) Do you have 148E of bundle 6, Ms. Esparza?
20 THE WITNESS: Yes.
21 MS. WASS: I want to establish, when you say you saw Ms. Heard, in
22 your statement you indicated that you were not working on the
23 Saturday, the 21st; is that correct?
24 A. That is correct.
25 Q. You did not ----

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1 ESPARZA - WASS
2 A. (Unclear).
3 Q. Sorry?
4 A. I apologise.
5 Q. It is all right. If you need to say something, your evidence
6 is important. Do you agree you did not work on, you were not
7 there on Saturday, the 21st?
8 A. That is correct.
9 Q. You did not see Ms. Heard on Sunday, the 22nd?
10 A. That is correct.
11 Q. You say?
12 A. (Unclear due to distortion) the point is Harrell saw her.
13 Q. Yes, we are going to hear from Mr. Harrell very soon. So, we
14 will hear what he has to say about that. All right? But
15 I want to ask what you say you saw. You say you saw Ms. Heard
16 on Monday, the 23rd, walking through the lobby?
17 A. Correct.
18 Q. She walked directly past you a few feet away.
19 A. Yes.
20 Q. Did you have any conversation other than to say hello?
21 A. (Pause) We spoke, I think a couple of times. We definitely
22 said hello.
23 Q. I am not challenging that, Ms. Esparza. She was perfectly
24 polite and said hello and walked past you .
25 A. She (unclear).

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<p>1 ESPARZA - WASS</p> <p>2 Q. Sorry?</p> <p>3 A. She was very lovely, yes. She was always very kind and</p> <p>4 respectful to me.</p> <p>5 Q. Thank you. On Tuesday, the 24th, again, you were at the front</p> <p>6 desk. You had no conversation with Ms. Heard other than</p> <p>7 polite greetings?</p> <p>8 A. Correct.</p> <p>9 Q. And on Wednesday, the 25th she came down to the lobby to give</p> <p>10 you a key fob?</p> <p>11 A. The keys to the penthouse, I believe.</p> <p>12 Q. And on the 26th you did not see her, but on the 27th you did,</p> <p>13 and you noticed the injury; that is the position, is it not?</p> <p>14 A. Correct.</p> <p>15 Q. Now, do you know where Ms. Heard was going on the Monday, the</p> <p>16 Tuesday and the Wednesday when she passed you?</p> <p>17 A. I do not believe so.</p> <p>18 Q. I mean, did you know if she was going somewhere where she</p> <p>19 wanted to look her best, or not?</p> <p>20 A. On Monday, Tuesday, and Wednesday?</p> <p>21 Q. Yes.</p> <p>22 A. She looked normal.</p> <p>23 Q. Exactly. Normally, she goes out, as you said, looking lovely,</p> <p>24 and is made up. She wears makeup, as a rule, does she not,</p> <p>25 she is an actress?</p>	<p>1 ESPARZA - WASS</p> <p>2 Q. You are saying that with insistence and I will come to why</p> <p>3 that might be in a minute. Do you accept that a concealer,</p> <p>4 foundation and powder is the sort of make up that goes on the</p> <p>5 face rather than the eyes and the mouth?</p> <p>6 A. Yes.</p> <p>7 Q. And did you ever have a discussion with Ms. Heard as to</p> <p>8 whether she wore foundation or tinted moisturiser or powder or</p> <p>9 concealer?</p> <p>10 A. Yes.</p> <p>11 Q. When?</p> <p>12 A. I had asked her. Her skin was so brilliant, I asked her what</p> <p>13 she used on her face. She said that someone had given her</p> <p>14 products and she had used something since she was really young</p> <p>15 to moisturise her skin.</p> <p>16 Q. So you discussed how she got such lovely skin. I asked you</p> <p>17 whether you ---</p> <p>18 A. Yes, I did.</p> <p>19 Q. I asked you whether you discussed whether she was wearing skin</p> <p>20 makeup or not.</p> <p>21 A. I asked her what she used on her skin.</p> <p>22 Q. Yes, and she told you the name of some sort of cosmetic face</p> <p>23 cream?</p> <p>24 A. No, she said she used some moisturiser that she had used since</p> <p>25 she was young.</p>
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<p>1 ESPARZA - WASS</p> <p>2 A. No, never wore makeup.</p> <p>3 Q. She never wore makeup?</p> <p>4 A. Only for when she was like going to, she had (unclear), then</p> <p>5 she would wear makeup, otherwise ---</p> <p>6 Q. Did you discuss with her ---</p> <p>7 MR. JUSTICE NICOL: I am sorry, Ms. Esparza, can you repeat the</p> <p>8 answer about whether Ms. Heard wore makeup, because I did not</p> <p>9 quite catch what you said.</p> <p>10 THE WITNESS: She did not have any makeup on.</p> <p>11 Q. Did you say she never wore makeup?</p> <p>12 A. Very rarely.</p> <p>13 MR. JUSTICE NICOL: Thank you.</p> <p>14 MS. WASS: Of course, when you are talking about makeup, there are</p> <p>15 different types of make up, are there not?</p> <p>16 A. Yes.</p> <p>17 Q. There is heavy eye makeup, which is very obvious, when it is</p> <p>18 put on?</p> <p>19 A. Correct.</p> <p>20 Q. There is heavy lipstick or bright-coloured lipstick, which</p> <p>21 again is very obvious when it is put on?</p> <p>22 A. Correct.</p> <p>23 Q. But there is the stuff that goes on between your eyes and your</p> <p>24 mouth which is either foundation or powder or concealer?</p> <p>25 A. She rarely wore that. She has a beautiful complexion.</p>	<p>1 ESPARZA - WASS</p> <p>2 Q. I understand that, but moisturiser is quite different from</p> <p>3 foundation?</p> <p>4 A. She said a moisturiser.</p> <p>5 Q. Sorry?</p> <p>6 A. She said a moisturiser.</p> <p>7 Q. I am not challenging whether she said it was a moisturiser or</p> <p>8 not. Would you, in your position as somebody working on</p> <p>9 reception, say to Ms. Heard, "Have you actually got foundation</p> <p>10 on?" Would you ask a question like that to her?</p> <p>11 A. Not in that way.</p> <p>12 Q. It would be hugely impertinent, would it not?</p> <p>13 A. I am very polite. I do talk to, I do express, I do express my</p> <p>14 thoughts to people constantly, depending where I am, so I</p> <p>15 would say something like, "You look very lovely", you know, or</p> <p>16 something of the sort.</p> <p>17 Q. I accept that ---</p> <p>18 A. Not in a weird way.</p> <p>19 Q. No. I accept your description of the sort of conversation you</p> <p>20 have, but you would not ask her flat out whether she was</p> <p>21 wearing foundation or not, would you?</p> <p>22 A. No.</p> <p>23 Q. So, you are making an assumption that she was not wearing</p> <p>24 foundation on those days, the Monday, the Tuesday and the</p> <p>25 Wednesday, as you have just told the court?</p>

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1 ESPARZA - WASS
 2 A. I could see her clearly and I could see that she did not have
 3 any makeup on.
 4 Q. The idea of foundation and concealer is that it does not look
 5 like you are wearing it. That is what it is supposed to do?
 6 A. She had a very dewy glow. I am a woman. I wear makeup. I
 7 know the difference when someone is wearing makeup or not
 8 wearing makeup.
 9 MR. JUSTICE NICOL: Just a minute. Go to those photographs in
 10 front of you, please.
 11 A. Uh-huh.
 12 MS. WASS: My Lord should have the better quality ones now.
 13 MR. JUSTICE NICOL: Yes.
 14 MS. WASS: Can you see the first photograph has a page at the
 15 bottom, F894.155.
 16 A. Yes.
 17 Q. Can you see a faint red mark on Ms. Heard's right cheek?
 18 A. Yes.
 19 MR. JUSTICE NICOL: Just a minute. (Pause) Did you say,
 20 Ms. Esparza, that you could see a faint red mark on her right
 21 cheek?
 22 A. In that picture, yes, I can.
 23 MS. WASS: Can you go over to F894.157.
 24 A. Yes.
 25 Q. Can you see the mark photographed from a different angle?

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1 ESPARZA - WASS
 2 A. Yes.
 3 Q. Again, F894.159, which shows the mark and the slight mark
 4 above her right eyebrow; do you agree?
 5 A. Yes.
 6 Q. Again, F894.161.
 7 A. Yes.
 8 Q. Sorry? Can you see that?
 9 A. Yes.
 10 Q. Can you see the marks there very clearly?
 11 A. Faint marks, yes.
 12 Q. What did you say? What did you call them -- pink marks?
 13 MR. JUSTICE NICOL: Faint marks.
 14 THE WITNESS: Faint, as in faint marks there.
 15 MS. WASS: And 894.163?
 16 A. Yes.
 17 Q. If you go ahead, they become more prominent if you look at
 18 F894.165.
 19 A. Yes.
 20 Q. The bruise is coming up, I am going to suggest to you,
 21 Ms. Esparza.
 22 A. Yes.
 23 Q. And again, F894.169. It is more distinct than in the earlier
 24 photographs we have looked at, is it not?
 25 A. That is correct.

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1 ESPARZA - WASS
 2 Q. And by the 27th, the bruise had come out quite considerably
 3 more. Can you go to F894.235.
 4 A. Can you repeat that?
 5 Q. Yes, F894.235.
 6 A. Yes.
 7 Q. You can see that the mark is coming up -- it is more
 8 pronounced in that photograph -- can you not?
 9 A. Yes.
 10 Q. Now, in that photograph, 894.237, Ms. Heard is not wearing
 11 makeup?
 12 A. That is correct.
 13 Q. Can you see that in the earlier photographs, for example,
 14 F894.161, she is wearing makeup?
 15 MR. JUSTICE NICOL: Sorry, this is 161?
 16 MS. WASS: 169, my fault. 169.
 17 A. Pardon me?
 18 Q. I would like you to compare two photographs. The first one is
 19 F894.169.
 20 A. And the other one?
 21 Q. The other one is F894.237.
 22 A. Yes.
 23 Q. Do you accept that Ms. Heard is wearing some makeup on 169,
 24 but none on 237?
 25 A. That is correct.

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1 ESPARZA - WASS
 2 MR. JUSTICE NICOL: Sorry, you agree that that is the case?
 3 A. Yes, I agree.
 4 MS. WASS: 237 was taken on 27th May, and that is what you saw.
 5 A. Yes. I remember seeing the shirt.
 6 Q. You remember the shirt and that is how she looked ---
 7 A. I remember it.
 8 Q. That is how she looked on 27th May?
 9 A. Correct.
 10 Q. Thank you very much indeed. Can I then ask you this. You
 11 viewed a lot of CCTV footage -- my Lord, I see the time.
 12 I have very little to ask this witness. I am in the court's
 13 hands?
 14 MR. JUSTICE NICOL: Ms. Esparza, the time difference means that it
 15 is a different time of the day in California, but are you
 16 content to continue your evidence now rather than come back
 17 another day?
 18 THE WITNESS: Yes, please.
 19 MR. JUSTICE NICOL: Yes, Mr. Sherborne, to try and fit in, I think
 20 I will continue.
 21 MR. SHERBORNE: I understand. It is why I asked Ms. Wass whether
 22 we were going to finish this afternoon and she was very
 23 emphatic she had nothing very much to ask.
 24 MR. JUSTICE NICOL: There we go.
 25 MS. WASS: I did not say that. I said we would finish and we

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1 ESPARZA - WASS
2 will. We will finish.
3 MR. JUSTICE NICOL: Yes.
4 MS. WASS: Ms. Esparza, I think you looked at the CCTV footage
5 from the building; is that right?
6 A. Yes.
7 Q. You kept it and either you or one of your colleagues gave to
8 Mr. Depp's lawyers?
9 A. Yes.
10 Q. And you said in your statement that there was an incident
11 which captured your attention when Ms. Heard was with some of
12 her friends and there was some sort of "fake punch gesture".
13 Those are your words, Ms. Esparza?
14 A. Yes.
15 Q. And miraculously or unfortunately, whichever way you want to
16 look at it, that CCTV footage has disappeared, has it not?
17 A. Correct.
18 Q. I suggest there was no fake punch demonstrated in front of
19 Ms. Heard. She may have been with friends, she may have even
20 been smiling and laughing with friends, but there was no fake
21 punch in the way that you have described?
22 A. There was a fake punch. Her sister pretended to punch her at
23 the (unclear) when they were going in the lobby, and they were
24 laughing.
25 Q. Now, the quality ----

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1 ESPARZA - WASS
2 A. Come back to ----
3 Q. Sorry, the quality ----
4 A. Pardon me?
5 Q. Sorry, we keep speaking over each other because of the time
6 delay and I apologise. The quality of the CCTV footage is
7 grainy, do you agree?
8 A. Not in person.
9 Q. I am not talking about in person. We have seen clips of CCTV
10 footage. It is quite grainy or do you disagree with that?
11 A. I disagree.
12 Q. You disagree, but you were able to review all of it and indeed
13 you went beyond the dates that you were asked to look at in
14 May, did you not?
15 A. Can you repeat that question?
16 Q. Let me tell you what I mean so it is clearer. You gave or
17 provided information to Mr. Depp's lawyers that after June,
18 some time in June and July, you saw a man called Elon Muss go
19 to the building to visit Ms. Heard.
20 A. Yes.
21 Q. And you have also said to Mr. Depp's lawyers that there was a
22 date when Mr. Musk was seeing Ms. Heard when you saw marks on
23 Ms. Heard's body, a number of marks on her body and three
24 round bruises on the left side of her neck.
25 A. I do not recall what month that was. I know it was not

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1 ESPARZA - WASS
2 (unclear), yes.
3 Q. I am sorry?
4 A. Yes. She had dropped her keys in the trash can or something
5 -- I do not know exactly when that was -- and she did have
6 some visible marks.
7 Q. Were they the marks that are contained in your statement, a
8 number of marks on her body; yes?
9 A. I believe (unclear). It was some time ago so I do not recall
10 exactly.
11 Q. Let us take it in stages. Marks on her body; whereabouts?
12 A. I forget, but I know that she had marks on her neck, I think,
13 and she had a band-aid(?) on her arm.
14 Q. How did it come about that you put in your statement that
15 Ms. Heard ----
16 A. My statement is accurate. So I have not read it and this is
17 from 2016 so I do not recall, what you are reading is
18 accurate.
19 Q. That is not what I am asking you. I am asking you how it came
20 about that you made a statement referring to Elon Muss in a
21 statement that was about video footage you were asked to
22 produce about dates in May?
23 A. When I was doing a previous deposition, they were asking me,
24 they asked me who had been there. They asked me what I saw
25 and I was completely honest, so that is where that statement

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1 ESPARZA - WASS
2 comes from.
3 Q. Did you tell Mr. Depp's lawyers before making a deposition
4 that you had seen Mr. Musk visit Ms. Heard?
5 A. I do not recall.
6 Q. Are you able to say how it was that -- well, who first
7 mentioned Elon Musk?
8 MR. JUSTICE NICOL: Ms. Wass, I have said that we will try and
9 complete this evidence this evening.
10 MS. WASS: All right.
11 MR. JUSTICE NICOL: I am not sure that dwelling on Elon Musk is
12 going to help you one way or another.
13 MS. WASS: What I will do, Ms. Esparza, is just put my suggestion
14 to you: at no stage, when Ms. Heard was in Mr. Musk's company,
15 did she have visible injuries?
16 A. (Pause) I am sorry, can you repeat that?
17 Q. I am suggesting ----
18 A. I do not know personally. I do not know what happened to her.
19 I do not know her personal life. I can guarantee you that,
20 I can guarantee you that Mr. Depp left Saturday night. I saw
21 her -- my employee told me on Sunday. He sent me a text
22 message that said he had just met Amber Heard. He was very
23 excited on how lovely she was. I said, "I know, she is very
24 nice and she is lovely." I saw her on Monday. I saw her and
25 she did not have any marks. I saw her later on that week and

1 ESPARZA - WASS
2 she did have marks and then she was going to court to get a
3 domestic violence restraining order. I thought that was very
4 peculiar because Mr. Depp had left on Saturday.
5 Q. I do not want to cut you short. I simply want to put my case
6 to you, which is that when Ms. Heard was in the company of
7 Mr. Musk, she did not have injuries in the way that you have
8 described?
9 A. I know that he left the building and she came downstairs and I
10 saw her and she did have some marks that were visible. I do
11 not know where they came from, but I did see them.
12 Q. Did you tell the court in the deposition, when you made a
13 deposition in the United States, that the only marks you saw
14 were like curling iron marks, as if she had had hair curlers
15 that had ----
16 A. I do not know exactly what they were. She had visible marks.
17 Q. You wanted to suggest, did you not, that Elon Musk must have
18 injured her?
19 A. I did not suggest that. I do not know.
20 MS. WASS: All right, I do not think I can take that aspect of it
21 any further unless my Lord feels ----
22 MR. JUSTICE NICOL: No, thank you. Yes.
23
24
25

1 ESPARZA - SHERBORNE
2 star-struck.
3 Q. Did he make any reference to her looks or not?
4 A. He said she was beautiful.
5 Q. We know that on the Monday, you were working on the front desk
6 at Eastern Columbia Building and you say that you greeted her
7 as you typically did, and she passed by you as she did so and
8 she was only a few feet away. Can I ask you this. Did you
9 get a clear view of her face?
10 A. Yes.
11 Q. When you say a few feet, can you give us roughly an idea?
12 A. An arm's distance away.
13 Q. Arm's distance away. I am going to ask you this, because you
14 were shown a photograph. Do you have, I think it is in
15 file 6. Do you have that? Do you have a photograph still in
16 front of you?
17 A. I do.
18 Q. Can you have a look for me, Ms. Esparza, at F894.169 you were
19 shown.
20 A. Yes.
21 Q. You can see the red marks, that is dated 21st May, I think you
22 were asked to speculate whether Ms. Heard was wearing makeup
23 or not. Do not worry about that at the moment. But had you
24 seen those red marks on her face, would you have said in your
25 witness statement, as you do, that you saw absolutely nothing

1 ESPARZA
2 RE-EXAMINED BY MR. SHERBORNE
3 MR. SHERBORNE: Ms. Esparza, I do not have many questions for you.
4 You started out your answers to Ms. Wass by saying that you
5 liked Ms. Heard; is that correct.
6 A. Yes. She has always been very sweet to me.
7 Q. You have no reason to be nasty to her, do you?
8 A. Absolutely not.
9 Q. Now, Ms. Heard has said in her fifth witness statement that
10 she saw you only rarely; is that correct?
11 A. What is rare? She lived in the building. I saw her often.
12 Q. I think you have answered the question. Can I just ask you
13 this, just to go through the dates. We have obviously
14 Saturday, 21st May, when you were not on duty. Have you got
15 your witness statement in front of you, Ms. Esparza?
16 A. I do.
17 Q. It is not meant to be a memory test. You can have it in front
18 of you. You will see at paragraph 11 that although you were
19 not on duty on May 22nd, you received the call from
20 Mr. Harrell, which I think you were going to say something
21 about and then Ms. Wass stopped you. Do you want to explain
22 very briefly what you heard from Mr. Harrell?
23 A. He was very excited because he met her for the first time. He
24 had helped her get her wine delivery and he said that she was
25 so sweet and lovely and he was excited. He was a little

1 ESPARZA - SHERBORNE
2 on her face?
3 A. Can you repeat that?
4 Q. Yes. If you look on your witness statement, on 23rd May, can
5 you see paragraph 12. Do you see the last sentence, you say:
6 "I looked her right in the face" -- she was only a few feet
7 away -- "as we said hello and I saw no visible injuries
8 whatsoever to Ms. Heard's face"; is that correct?
9 A. Yes, that is correct.
10 Q. Looking at this photo, that is the photo taken, we are told,
11 on 21st May. That is what her face would have been. Ms. Wass
12 said to you it got worse and worse. Had you seen Ms. Heard
13 looking like that, makeup or no makeup, would you have said
14 she had no visible injuries on her face?
15 A. Would I have said she had no visible injuries there?
16 Q. Yes. Had you seen her look like you do in that photo, you
17 would have said she had visible injuries?
18 A. Yes, she had visible injuries, yes.
19 Q. And on 23rd May, when you saw her, did she have, a few feet
20 away, you saw her clearly in the face, did she have any
21 visible injuries at all?
22 A. No. No, she did not.
23 Q. Again, 24th May, you see her, and you say the same thing
24 again. You saw her in close proximity and, once again, you
25 did not see any physical injuries to her face; true or not

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<p>1 ESPARZA - SHERBORNE</p> <p>2 true, Ms. Esparza?</p> <p>3 A. True.</p> <p>4 Q. Then we have Wednesday, the 25th. Again, you see her on</p> <p>5 the 25th. If you look at the last couple of sentences, you</p> <p>6 said: "Ms. Heard was not wearing any makeup at that time."</p> <p>7 When you were that close to her, a few feet away, would you</p> <p>8 have been able to tell or not whether she was wearing makeup?</p> <p>9 A. Yes.</p> <p>10 Q. And you said to her that her skin looked flawless; is that</p> <p>11 correct?</p> <p>12 A. Correct.</p> <p>13 Q. Had you seen the injuries like the ones that I have shown you,</p> <p>14 would you have said to Ms. Heard that her skin looked</p> <p>15 flawless?</p> <p>16 A. No.</p> <p>17 MR. SHERBORNE: Thank you. Ms. Esparza, I have no further</p> <p>18 questions for you. Thank you very much.</p> <p>19 MR. JUSTICE NICOL: Ms. Esparza, I am going to repeat what I said</p> <p>20 before. Thank you for giving your evidence and thank you for</p> <p>21 doing it at what may have been an uncomfortable time. That</p> <p>22 completes your evidence and you are now free to go.</p> <p>23 THE WITNESS: Thank you.</p> <p>24 (The witness withdrew)</p> <p>25</p>	<p>1 DISCUSSION</p> <p>2 MR. SHERBORNE: She is going to be in Los Angeles with Ms. Vargas.</p> <p>3 MR. JUSTICE NICOL: So, the translator is going to be with</p> <p>4 Ms. Vargas in Los Angeles.</p> <p>5 MR. SHERBORNE: My Lord, yes.</p> <p>6 MR. JUSTICE NICOL: Then, we will need to swear the translator as</p> <p>7 well and it will be helpful if, shortly before Ms. Vargas</p> <p>8 comes to give her evidence, the translator and she have had an</p> <p>9 opportunity to make sure that they understand each other.</p> <p>10 MR. SHERBORNE: My Lord, yes.</p> <p>11 MR. JUSTICE NICOL: All right. Then 10 o'clock tomorrow.</p> <p>12 (Adjourned till 10 a.m. tomorrow morning)</p> <p>13</p> <p>14</p> <p>15</p> <p>16</p> <p>17</p> <p>18</p> <p>19</p> <p>20</p> <p>21</p> <p>22</p> <p>23</p> <p>24</p> <p>25</p>

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<p>1 DISCUSSION</p> <p>2 MR. JUSTICE NICOL: Good. Now, Ms. Wass and Mr. Sherborne, I have</p> <p>3 sat late this evening. I do not want you to assume that I am</p> <p>4 going to do that every evening. I do understand that there is</p> <p>5 an advantage in completing witnesses who are giving evidence</p> <p>6 via a video link, but I do want you also to understand that</p> <p>7 court staff are inconvenienced if we have to sit late. I am</p> <p>8 not going to say more, but simply put down a marker that this</p> <p>9 is not to be regarded as a precedent that we are going to</p> <p>10 follow every day.</p> <p>11 MS. WASS: Thank you.</p> <p>12 MR. JUSTICE NICOL: All right. Good. Now, tomorrow, just remind</p> <p>13 me who we have on the schedule.</p> <p>14 MR. SHERBORNE: Your Lordship should have the timetable. I am</p> <p>15 going to have to move a mountain of files to get to my copy.</p> <p>16 I think I am right in saying that tomorrow it will be</p> <p>17 Mr. Connolly and Ms. Roberts in the morning, and</p> <p>18 Samantha McMillen and Ms. Vargas in the afternoon.</p> <p>19 Mr. Connolly is in London; but the other three witnesses will</p> <p>20 be giving their evidence by way of video link.</p> <p>21 MR. JUSTICE NICOL: Right. I think that Ms. Vargas needs a</p> <p>22 translator as well.</p> <p>23 MR. SHERBORNE: That is right, my Lord.</p> <p>24 MR. JUSTICE NICOL: Is the translator going to be in London or</p> <p>25 wherever she is giving evidence from?</p>	

A	ACCESS 0:22	790:14	888:22	864:17	821:12
a.m 899:12	accommodat...	active 712:9	898:18	866:20	allegedly
aback 731:11	816:24	actively 711:18	age 749:10	868:25 869:2	792:22
able 698:4	accommodat...	711:21 833:8	agent 716:14	870:23 876:9	allow 828:15
710:6 711:5	699:17	activist 722:24	aggravation	876:19 880:6	allowed 833:20
727:11	accord 719:7	actor 818:20	817:17	886:4 888:2,3	allows 782:25
739:16,22	749:13	818:20	aggressive	890:7	altercation
759:17,18,19	755:14	832:12	759:20	agreed 728:3	711:16,22
759:19	756:16,21	actress 881:25	762:16	748:5 804:24	722:5
765:13	757:18 781:7	acts 710:18	aggro 757:16	828:6 858:3	altered 865:6,7
769:16 771:8	816:11	792:25	ago 716:16	871:4,4	alternative
772:3 789:18	accorded	ADAM 0:19	796:10	agreeing	730:22 731:5
801:18 815:8	840:18	added 793:2	847:21 849:8	822:19	alternatives
825:23	account 713:17	addiction	878:3 891:9	agreement	730:20
828:20 867:6	782:2 785:25	783:22,23	agree 737:4,15	868:14	altogether
867:11,18	826:15	823:4	737:23	Ah 855:18	750:25
870:13,24	868:20	addition 739:5	738:15	ahead 829:3	809:16
890:12 892:6	accountable	870:6	742:14	886:17	Amber 713:24
897:8	779:5	additional	743:16 746:6	aimed 764:3	714:16
absconded	accountant	707:18	748:24	airplane	718:22 737:8
715:13	868:10	adjective	749:17,20	767:14 771:6	755:13,17,24
absence 868:13	accurate	788:17	750:13 751:4	771:21	759:11
absolutely	756:23 757:3	791:22 849:3	753:17,20	alcohol 714:2	792:23,25
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