

TRANSCRIPT OF THE POOL TV FEED FROM DEPP v HEARD

FAIRFAX COUNTY COURT Tuesday 12 April 2022

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Bailiff: Court is now in session. The Honorable Penney Azcarate is presiding. Please be seated, everyone.

Judge Azcarate: Good morning, Judy. Can you hear everything okay today? Okay, good. All right, good morning. All right. Do we have any preliminary matters before the jury comes out?

Mr. Chew: Yes, Your Honor. We would just ask Your Honor to please publish our very demonstrative exhibit.

Judge Azcarate: All right. There's no objection to that? People have changed places here, I just want to make sure I look at the right place. Okay, we're good.

Mr. Chew: It's a blank screen right now, so we would ask to publish it now.

Judge Azcarate: Okay. I'm assuming it's...

Mr. Chew: We tried it out beforehand, it seemed to work.

Judge Azcarate: If it's a blank screen, it's hard to see if it's working or not.

Mr. Chew: Understood.

Judge Azcarate: It is published.

Mr. Chew: Thank you, Your Honor.

Judge Azcarate: But it's just a blank screen, I guess. Okay. We're going to hope that's it, then. All right. Thank you. Anything other else we have? All right, ready for the jury?

Mr. Chew: Yes, Your Honor.

Judge Azcarate: Okay, great. All right. Good morning, ladies and gentlemen. If I can have you move your water down by your chair, just not have anything there. If we get electronics and we mess up the

electronics, I get in trouble. So, thank you. I hope you like the seat that you're in. I'd like you to stay in that seat for the duration. I'd appreciate it. I hope you had a good evening. All right. Thank you, and thank you for being punctual today. I appreciate it. You can have a seat.

All right. Are we ready with opening statements?

Mr. Chew: Yes, Your Honor.

Judge Azcarate: All right. Go ahead, sir.

Mr. Chew: Good morning. My name is Ben Chew. My colleagues and I from Brown Rudnick are truly honored to represent the plaintiff in this case, Johnny Depp.

Some of you may recognize Mr. Depp from seeing him portray characters such as Edward Scissorhands or Captain Jack Sparrow from the "Pirates of the Caribbean" movies. For nearly 30 years, Mr. Depp built a reputation as one of the most talented actors in Hollywood, a respected artist whose name was associated with success at the box office. Today, his name is associated with a lie, a false statement uttered by his former wife, the defendant, Amber Heard, that falsely cast Mr. Depp, falsely and unfairly characterized, cast Mr. Depp as a villain, a man who would violently abuse a woman.

This is a defamation case. It's a case about how devastating words can be when they are false and uttered publicly. Under the law, a person who makes a false statement about someone else can be held responsible for the harm that results from that falsehood. That's because words matter. They paint a picture in our mind based on what we have experienced and what we know or what we think we know. And because of that, words can evoke strong emotions in the listener and cause irreparable harm to a person's reputation. And when, like Mr. Depp, your career depends upon your image and your reputation or whether movie producers want their films associated with you, that harm can be particularly devastating.

This is a case about the impact of Amber Heard's words on Johnny Depp, specifically, the words that she used in an op-ed published in "The Washington Post" in December 2018, which is shown on the screens. And the op-ed was published, and this is no accident, the evidence will show, on the eve of her first major acting role in the movie "Aquaman." The evidence will show, that's no coincidence. The evidence will show the words that Ms. Heard used, which are the subject of Mr. Depp's defamation suit against her. And there are three statements that we respectfully ask each of you to focus on.

Statement number one, "I spoke up against sexual violence and faced our culture's wrath." Statement number two, "Two years ago, I became a public figure representing domestic abuse." And I want to repeat that because you're going to hear that throughout the case, because the timing here is critical. "Two years ago, I became a public figure representing domestic abuse." Statement number three, "I had the rare vantage point of seeing, in real time, how institutions protect men accused of abuse."

Ms. Heard did not use Mr. Depp's name in the op-ed. She didn't have to. She didn't have to because the evidence will show that everyone in Hollywood, where Mr. Depp and Ms. Heard both have their careers, and many others outside Hollywood knew exactly what she was talking about when she used the word, "Two years ago, I became a public figure representing domestic abuse." That's because, as the evidence will show and you will hear, 2 years earlier, on May 27th, 2016, Ms. Heard had publicly accused Johnny Depp, her husband at the time, of domestic abuse.

You will learn during the trial that Ms. Heard's actions were prompted by Mr. Depp's request for a divorce. He wanted out, which drove her to concoct, to make up a story that was, at first, designed to keep him and then, when he made it clear that, finally, after all he had endured, he was done, was designed to recast herself as an abuse survivor, with Mr. Depp as the alleged abuser. The evidence will show that six days after Mr. Depp requested a divorce, and he did so politely, and three days after Ms. Heard's lawyer threatened Mr. Depp with claims of abuse if he did not agree to her financial demands, Ms. Heard arrived at the courthouse in Los Angeles, California to file for a restraining order alleging abuse.

Ms. Heard, the evidence will show that Ms. Heard showed up with a mark on her face that mysteriously appeared six days after she last saw Mr. Depp and six days before she publicly filed a request for domestic violence restraining order alleging abuse. The evidence will show that her publicist and the paparazzi were there at the courthouse to document the event to make sure that Johnny Depp's name was forever associated with the image of an innocent battered woman. It was a jolt. It was a shocking story, splashed across front pages across the country. No one had ever, in five decades, accused Johnny Depp of being violent with a woman. No one had ever accused Mr. Depp of being violent with a woman. He had been in other long-term relationships. He had children.

Ms. Bredehoff: Objection, Your Honor. May we approach?

Mr. Chew: No one, as I stated before, no one had ever, in five decades, no one had ever accused Johnny Depp of being abusive of any kind with a woman. That's why it was such a jolt. He had been in other long-term relationships, as I said. He had two children. And no one had even suggested ever that he was capable of something like this.

By choosing to lie about her husband for her own personal benefit, Amber Heard forever changed Mr. Depp's life and reputation, and you will hear him tell you the dreadful impact that it has had on his life. The evidence you will hear at this trial contradicts the story Ms. Heard presented to the world in May 2016, and again in December 2018. The evidence will show that the last time Mr. Depp and Ms. Heard saw each other, before Ms. Heard showed up in court on May 27th, 2016, was May 21st, and that's a very important date, and I will ask you, please, to remember that through the trial. Mr. Depp's mother, Betty Sue, passed away on May 20th, after a long illness, when Johnny and his sister, Christi, had been taking care of his mother for a very long period of time. And for reasons that Mr. Depp will personally explain to you throughout the course of this trial, he had resolved to divorce Ms. Heard.

So, on May 21st, Mr. Depp came by the apartment that he shared with Ms. Heard in the Eastern Columbia Building or the ECB, as some people refer to it, to tell her that, to pick up his things, and to say goodbye. There is no dispute that, soon after Mr. Depp ended things with Ms. Heard and left the apartment on May 21st, he got on a plane to head out on a European tour, a music tour, for months, with his band, The Hollywood Vampires. And Ms. Heard knew that he was going off on tour and out of state when she walked into court to get the restraining order, which she obtained ex parte. It's a Latin word, fancy word, but all it means is that Mr. Depp and his lawyer were not there and had no opportunity to be heard. That's what an ex parte order is.

You will hear from the police officers who responded to a 911 call on May 21st after Mr. Depp left. The police officers will testify that they saw no injuries on Ms. Heard. Both police officers will testify that they saw no injuries on Ms. Heard, nor did the police officers see any of the property damages that you will hear Ms. Heard claims existed in the apartments that evening. And you will hear those officers, under oath, testify that there was no violence and that there was no crime. You will also hear from multiple witnesses who, like the police officers, saw Ms. Heard between May 21 and May 26. Those are the crucial days between the alleged incident and the day she walked into court with her lawyer and

got an ex parte order. And those witnesses will testify that they saw her without any marks, any signs of injuries on her face. And you will hear from multiple witnesses, including Brandon Patterson, who is the manager of the Eastern Columbia Building, where Mr. Depp and Ms. Heard live together. You will hear Mr. Patterson say that he saw...and others will say as well, that they saw a surveillance video from the week of May 21st that showed Ms. Heard's sister, Whitney, throw a fake punch at Ms. Heard's face.

Let's just stop there. This is the surveillance video you will hear about where the sister of the alleged victim threw a fake punch at her sister, allegedly, which allegedly occurred, this incident, only a couple of days earlier, Ms. Heard acting out being punched, responding to the fake punch, and the two laughing about it. So you have the alleged victim and the sister laughing about a fake punch. And you will have to decide for yourself, or we ask that you please decide for yourself, would anyone ever joke about that if there had been actual abuse, much less, ask yourself, would a sister ever joke with an alleged victim about being punched by her husband?

Of course, none of this contradicting evidence was publicly available when Ms. Heard walked into court on May 27th and got her restraining order. Instead, as you can imagine, the media storm was instantaneous. You will hear about and see some of that media coverage, which published pictures of Ms. Heard walking into court, and other pictures supposedly showing injuries supposedly caused by Mr. Depp, a man who had never been accused of abuse of a woman. The evidence will show that Mr. Depp and Ms. Heard eventually settled their divorce out of court. Thereafter, Ms. Heard dismissed her restraining order against Mr. Depp.

But Ms. Heard's false claim that Mr. Depp had abused her remained in the public sphere. It didn't go away. The images were permanent. And the evidence will show that, two years later, which is why we're pointing to that, that reference in the op-ed, in the wake of the #MeToo movement, and just before the release of Ms. Heard's role in the movie "Aquaman," Ms. Heard chose to remind the world about the festering allegations, this time under the banner of a national, international newspaper, "The Washington Post." In the op-ed, in her op-ed, Ms. Heard again painted herself as the innocent victim of abuse, but this time, this time with a wider audience primed to take action against industry powerhouses accused of abuse.

The evidence will show that the clear implication in Ms. Heard's op-ed that you have in front of you was that she was the victim of domestic abuse perpetrated by Mr. Depp. The evidence will show that that was a lie, and it remains a lie, when it was repeated and republished two years later. Hollywood studios don't want to deal with the public backlash from hiring someone accused of abuse, even someone with the incredible body of work and record that Mr. Depp can be proud of. A false allegation can devastate a career. And it can devastate a family. And the evidence will show that Ms. Heard's false allegations had a significant impact on Mr. Depp's family and his ability to work in the profession he loved and loved to bring joy to everyone.

Ultimately, this trial is about clearing Mr. Depp's name of a terrible and false allegation. We ask you, in the next several weeks, to please, please, carefully consider the evidence, assess the reliability and credibility of that evidence, and to make your own determination about what actually happened between Mr. Depp and Ms. Heard. And to tell you more about that, I am going to turn it over to my colleague, Camille Vasquez, who you had the pleasure of meeting yesterday. Thank you all for your attention.

Judge Azcarate: Ms. Vasquez.

Ms. Vasquez: Your Honor, may I approach?

Judge Azcarate: Sure.

Ms. Vasquez: There we go. [inaudible 00:18:53]. Thank you. Thank you, Ben. And good morning.

Over the course of this trial, you're going to have an opportunity to get to know Johnny Depp, not the characters he's portrayed but the man himself. You will hear from Mr. Depp directly, but you will also hear from his friends, his family, and employees. You will hear from people who have known him for decades. They have seen him at his best, and they have seen him at his worst. And they will tell you, each of them, that he is a kind soul who has never and would never raise a hand to a woman. You will hear that Mr. Depp learned at a very young age how to coexist with an abusive woman.

You will learn from Mr. Depp's sister, Christi, and from Mr. Depp that their mother, Betty Sue, lived in a constant state of anger that would boil over daily, in vicious words and violence, directed at her husband and their children. And you will hear how Mr. Depp, who had the personality of his father, coped with that abuse in the same way his father did. He just took it. The evidence will show that Mr. Depp learned that the best

way to deal with violence was to leave, to get away from it, give her time to cool down. But he never turned his back on his mother. Mr. Depp loved his mother, and he cared for her until the day she died.

You will hear how Mr. Depp came to Los Angeles as a teenager. He first planned to be a musician, then became an actor, and eventually, thanks to his talent, his dedication, and a lot of hard work, grew into one of the biggest movie stars in the world. He had relationships with major figures, in Hollywood and elsewhere, like Winona Ryder, Kate Moss. And before he met Amber Heard, he was with the same woman, Vanessa Paradis, for 14 years. He had two children with her. And even though he was a megastar, they had a quiet, domestic life. In fact, you'll hear, as Mr. Chew already told you, that in Mr. Depp's 58 years, not a single woman has ever accused him of violence, and nobody, in Hollywood or the world, had any reason to believe he was an abuser, until Ms. Heard publicly accused him in 2016. You're also going to hear evidence about Ms. Heard. You're going to learn that she's a profoundly troubled person, who manipulates the people around her just like she manipulated Mr. Depp.

Ms. Heard came to Los Angeles and sought a career in acting after Mr. Depp was well established as a movie star. Mr. Depp and Ms. Heard first met in 2009 on the set of the film "The Rum Diary." There was a significant age difference between them, and at first, he avoided her advances. But she pursued him. She wooed him. The evidence will show that Ms. Heard went to great lengths to win him over by playing the doting girlfriend. And it worked. He fell head over heels in love with her. Those who watched this relationship developed saw red flags all over the place. You will hear from them in this trial. And over time, the real Ms. Heard began to emerge. She would berate him, scream at him. He would try to appease her and sometimes, just sometimes, things would get better. But it would always happen again.

The evidence will show that Mr. Depp started coping with Ms. Heard in the same way he did as a child. He would try to get away, avoid the conflict. But his trying to leave enraged Ms. Heard. She would resort to physical violence, throwing things at him, hitting him. She would tell him he was a coward. She would tell him he wasn't man enough because he wouldn't stay and fight with her. You will see that Ms. Heard equated anger and violence with passion. She would apologize with poetic excuses as if the violence just proved how fierce and overwhelming her love for him was. And you're going to hear that, when Ms. Heard got violent, Mr. Depp would just retreat, just as he did with his mother. He would try to leave to get away from her. In her words, Ms. Heard's

words, he would split. Mr. Depp would often retreat into bathrooms, lock the doors, wait out Ms. Heard's aggression. But his leaving just provoked her more.

You will hear from Mr. Depp's security people, like Sean Bett, about how they often had to remove Mr. Depp from scenes with Ms. Heard screaming at him, chasing him, trying to keep him from leaving. You're going to hear evidence that, when Mr. Depp and Ms. Heard traveled together, his team routinely had to book an extra room for him so that he had somewhere to go when Ms. Heard became enraged. You'll hear from other witnesses, including Mr. Depp and Ms. Heard's marriage counselor, her name is Dr. Laurel Anderson, who perceived Ms. Heard as the aggressor in the relationship, Ms. Heard as the aggressor in the relationship, the one who would strike Mr. Depp to try to keep him from leaving. You'll hear from medical professionals who were with Mr. Depp and Ms. Heard, often on a daily basis, for years, including their doctor, David Kipper, and Ms. Heard's personal nurse, her personal assigned nurse, Erin Boerum Falati, who did not see any signs of injuries that Ms. Heard later testified to in graphic detail.

Ms. Heard wants you to ignore the testimony of these medical professionals, who saw her in real-time, just as she wants you to ignore the testimony of the police officers, who testified under oath, who saw her on May 21st, 2016 without any injuries. But it is up to you, ladies and gentlemen of this jury, to judge the credibility of these witnesses and that of Ms. Heard.

In this trial, Ms. Heard will undoubtedly present photos that supposedly show injuries she sustained as a result of the claimed abuse by Mr. Depp. Here's what you should keep in mind when you see these photographs. First, the evidence and expert testimony from forensic pathologist, a doctor, will show that the injuries reflected in these photographs are not consistent with the brutal allegations of abuse Ms. Heard has alleged. Second, there are multiple, multiple witnesses, including medical professionals and police officers, who will testify that they did not observe the injuries supposedly reflected in these photographs. And you may be wondering, "How can that be?" Well, you will hear expert testimony that none of these photographs are the originals, not one, and many are stored in an editing program. So they could have been manipulated and cannot be confirmed as authentic. Importantly, you will not see a single photograph of the vast majority of the abuse alleged by Ms. Heard. Not one. And there is not a single photograph or video showing Mr. Depp becoming physically violent towards Ms. Heard.

The only medical report of an injury during their relationship was a severe one, and it was sustained by Mr. Depp after an argument shortly after their marriage while the couple was in Australia. You will hear evidence that the people who cared about Mr. Depp were encouraging him to have a prenuptial agreement with Ms. Heard, but she rushed the wedding date, and he agreed to get married without one. After the wedding, again, people close to Mr. Depp encouraged him to consider a postnuptial agreement. When the topic came up, Ms. Heard became outraged, as she always did, at the suggestion that Mr. Depp might leave her. She berated him, and when he tried to leave, she became violent. She became so violent, in fact, she threw a vodka bottle at him that hit his hand and exploded. It severed the end of one of his fingers. You'll see pictures of Mr. Depp's severed finger and learn about his emergency medical treatment for that injury.

And then you'll learn, and this is important, years later, after the false claims of abuse that caused Mr. Depp to file this very lawsuit, Ms. Heard came up with an elaborate story about what actually happened, according to her, in Australia. And what she said happened was that it was a three-day hostage affair, an episode, where she was violently attacked and then sexually assaulted by Mr. Depp. You will see for yourself that the evidence does not support the story she told after she was sued.

You will learn that there came a time when Mr. Depp was done, and you'll learn from him, and he will tell you why, the evidence will show that on May 20th, 2016, Mr. Depp's mother, Betty Sue, passed away. You will hear from Mr. Depp that his mother's passing was a wake-up call that helped confirm what he already knew, that the relationship with Ms. Heard wasn't working and that Ms. Heard was not going to change. If you've ever lost a parent, you understand how much this experience can change your perspective on what is important for your own well-being. So Mr. Depp resolved to finally divorce Ms. Heard and told her that very day that he would do so respectfully and, most importantly, discreetly. The evidence will show that, on May 21st, 2016, when Mr. Depp went over to the Eastern Columbia Building to gather his things, Ms. Heard caused a final dramatic scene. In the wreckage of their relationship, Ms. Heard spun the final encounter between them into a tale of domestic abuse.

Now, I understand that many of you may be asking yourselves why. Why would Ms. Heard say that Mr. Depp abused her during their relationship if it didn't actually happen? Why would she make up the detailed dramatic tales of abuse that you will surely hear in this courtroom over

the coming weeks? By the end of this trial, you will have the answer to that question. The evidence will show exactly who Ms. Heard is.

You will hear from Mr. Depp and other witnesses, including their marriage counselor, Dr. Laurel Anderson, that Ms. Heard would go to great lengths and even resort to physical violence to stop Mr. Depp from leaving her. But once Mr. Depp did leave, Ms. Heard tried to avoid public humiliation and present herself as a noble survivor and representative of the #MeToo movement. You will hear evidence, including the testimony of Ms. Heard's former personal assistant, Kate James, that Ms. Heard is obsessed with her public image. It's her number one priority. And you will see evidence that after she received a \$7 million divorce settlement from Mr. Depp, Ms. Heard released a public statement claiming she wanted nothing from him and would donate the entire settlement to 2 charities, the Children's Hospital of Los Angeles in California and the American Civil Liberties Union, also known as the ACLU. But then, she did not make the donations.

Quite simply, Ms. Heard had publicly cast herself in the role of a domestic abuse survivor. There was no going back. When Mr. Depp finally stood up and fought for his good name in court by filing this lawsuit, Ms. Heard, because she couldn't back down, went all in. After this lawsuit was filed, it's important, the timeline here, after this lawsuit was filed, Ms. Heard started making up more and more alleged incidents of abuse. And if you'll recall, ladies and gentlemen, the headline of the op-ed references sexual violence. But Ms. Heard had never made that accusation against Mr. Depp. It was never part of her allegations of abuse. So what changed? What changed between 2016 and 2018?

We submit to you, and the evidence will show, when she realized the seriousness of what she had alleged, she panicked, and she alleged sexual assault. Ms. Heard and her lawyers are going to tell you some truly horrific tales of abuse before this trial is over, but the horrific details are designed. They're designed to shock you and to overwhelm you. They are designed to be explosive, and they are designed to distract you from the evidence and, most importantly, from common sense. That tells you, the common sense and the evidence will tell you, that it is all a lie, that none of this, not one single alleged incident of abuse, could have happened as Ms. Heard claims.

Ms. Heard's pattern is consistent. She tells the lies, then covers up that lie with still more lies, in a constantly changing, evolving, ever more dramatic story. You're going to hear a lot about Mr. Depp during this trial. Ms. Heard is going to tell you a lot of things about him, that he abused

drugs and alcohol, that he used bad and offensive language. And it's true, that Mr. Depp has had real struggles with substance abuse in his life. He's not denying that. You may know people close to you who have struggled too. But struggling with drugs and alcohol doesn't make you an abuser. He has also used some very colorful language. He uses words that I don't use and you probably don't use, and he uses them frequently. Mr. Depp, like all of us, is not perfect, but he did not abuse Ms. Heard. All of this is just meant to distract you from what this case is about.

This case is about what Ms. Heard said in her op-ed. The evidence will show that Ms. Heard painted a picture of herself as a heroic, innocent survivor of abuse by Mr. Depp, a beaten woman who finally stood up to her tormentor. The evidence will show that Ms. Heard used her allegations against Mr. Depp to raise her own profile and to advance her own career the very same day that the op-ed was published under the title, "I spoke up against sexual violence." She posted that article, that's now displayed on your screens, and the title on her Twitter page, right along with an announcement that she was becoming an ACLU ambassador on women's rights to make sure that "women and girls can live free from violence."

She presented herself as the face of the #MeToo movement, the virtuous representative of innocent women across the country and the world who have truly suffered abuse. The evidence will show that was a lie, and the evidence will show that Ms. Heard portrayed Mr. Depp as the representative of abusers everywhere, the agent of her suffering, the villain in her heroic journey. That was a lie too. And more than just a lie, it was an act of cruelty. Mr. Depp will go to his grave knowing that whatever he does, there are people out there in this world who will always believe that he abused a woman.

This is a case about what Ms. Heard said. It's also a case about what a man named Adam Waldman said. Adam Waldman is a lawyer who has worked for Mr. Depp. After...again, timeline, after Mr. Depp filed this case against her, Ms. Heard filed her own claim against Mr. Depp, which is also the subject of this trial. In her claim, Ms. Heard says that Mr. Depp defamed her because Adam Waldman, his attorney, made some statements to reporters denying the truth of her claims of abuse. Adam Waldman is not in this courtroom. Ms. Heard chose not to name him in her claim. And I won't take up too much of your time with a discussion of her claim against Mr. Depp, except to say a few things.

The evidence will show that those statements weren't even made by Mr. Depp. They were made by Adam Waldman. And Mr. Waldman, the evidence will show, is not under Mr. Depp's control. The statements were merely Mr. Waldman's opinions, made in justified defense of his client and friend, Mr. Depp. Mr. Waldman believed those statements. And finally, at the end of the day, Mr. Waldman's statements merely reflected the reality that we intend to prove in this trial, that Ms. Heard's portrayal of herself as a victim of domestic violence at the hands of Mr. Depp is a lie.

Ms. Heard, as you know, is an actress. When she accused Mr. Depp of abuse and painted herself before the world as a representative of abuse victims everywhere, Ms. Heard took on the role of a lifetime. She can't back down. She has been living and breathing this lie for years now, and she has been preparing to give the performance of her life in this trial. But this trial is about the evidence. It's about a man's reputation, and it's about his whole life, his ability to walk down the street, look people in the eye, without having to think he's an abuser. It's about the truth, and the truth will come out in this trial.

At the end of this trial, we will ask you to render a verdict for Mr. Depp. We will ask you to tell the world that he is not the abuser she described and that she is not the victim she portrayed. And we will ask you to tell Ms. Heard that what she did was wrong. Thank you very much.

Judge Azcarate: Thank you, Ms. Vasquez. All right. Ladies and gentlemen, it's a little early, but maybe we should go ahead and take our morning break just since it's a natural point to have a break before we have the second opening statement, okay? So why don't we go ahead and take a 15-minute recess? Just remember, do not discuss the case and don't do any outside research, okay? All right, you're free to go.

All right. Thank you. All right. Opening statements. Mr. Rottenborn.

Mr. Rottenborn: May I approach?

Judge Azcarate: Yes, sir.

Mr. Rottenborn: Good morning, everyone. My name is Ben Rottenborn, and together with Elaine and Adam, I represent Amber Heard.

In a few minutes, Elaine will get up here, and she'll introduce you to Amber. And she'll address the allegations that you just heard in Mr. Chew and Ms. Vasquez's opening statement. And she'll explain to you why all those inflammatory things are things that are designed to mislead you, mislead you from the truth. She'll explain to you what the

evidence will show, and that's something that we're going to focus on in this trial, not attempts to distract you. We're going to focus on the evidence, not what we wish the evidence showed, not some crazy conspiracy theories, but what the evidence and the facts actually show. And as you assess the evidence in this trial, I would ask that you keep one question in mind above all else, which is this, why are you here? What are you being asked to decide?

You're being asked to decide a very simple question, and that question is, were the words that Amber used in the December 18th, 2018 opinion piece that was published in "The Washington Post" protected free speech under the First Amendment or not? That is the question, and that's what you're being asked to decide. At the end of the trial, the judge will explain to you what the law is on defamation and what Mr. Depp's burden is to prove in order to establish defamation. And she'll tell you a lot of things about the law, but among them, she will tell you that Mr. Depp will have to prove that the words Ms. Heard used were about him and that they were false. If he can't do that and if he can't meet the other elements of the claim, then he loses that claim.

And he can't do that. He can't come close to doing that, and for that reason, you're going to hear, in this trial, Mr. Depp's team is going to make it about trying to distract you from that very simple question. Mr. Depp's team is going to try to turn this case into a soap opera. Why? I'm not really sure, because the evidence isn't pretty for Mr. Depp. It's not. You're going to see who the real Johnny Depp is, behind the red carpets, behind the fame, behind the money, behind the pirate costumes. You're going to see who that man really is.

Amber is going to tell you about it. You're going to hear who he really is from other witnesses, and you're going to hear who he really is in his own words, in the vile, graphic, terrible messages that he wrote about Amber and ways he used to describe Amber and what he wanted to do to Amber, from the earliest days that they were dating, through their marriage, and after their marriage. You're going to hear about that.

But this case isn't about that. This case isn't about a day-to-day chronicle of their marriage. It's not about who is the better spouse. It's not about who you like more. It's not about which party can sling more mud. But you're going to hear a lot of that in this trial. You're going to hear that because that's what Mr. Depp wants to turn this case into. He wants to turn this case into a six-week-long public spectacle of the most intimate aspects of their relationship and their marriage. And you know what, I'm sorry for that. I'm sorry. I'm sorry that we're going to have to do

that. I'm sorry that you're going to have to listen to all of it. And I'm sorry that Amber's going to have to relive that. But that's the case that Johnny Depp chose to bring. And we're not going to stand idly by and let him sling mud at our client and make inflammatory and false statements, like you just heard in opening, and not let those go unresponded to.

But ultimately, what this case is about, is about the First Amendment, about that December 18th, 2018 op-ed piece, and whether Ms. Heard's freedom of speech and the First Amendment give her the right to say the words that she said. That right, that freedom of speech, is what Amber Heard is asking you to uphold and protect in this lawsuit. And that's a very simple question, a question you could decide this afternoon, and it does not require you to stand and serve as the umpire of two movie stars' imperfect marriage. It doesn't. And so we're going to focus on those words. We're going to look at those words. And as we look at those words, I'd ask you to keep this in mind.

Keep in mind what you just saw on the screen for Mr. Chew when he put up those words. Keep in mind what you didn't see. You didn't see the rest of the opinion piece. And what we'd ask is that, as you look at those words, that you look at them in the context of the piece in which they were written. Now, whether you look at them individually or in the context of the piece, it doesn't really matter, because the words are true. But context matters.

And so what I'm going to do is I'm going to ask Heather to put up the article, put up the opinion piece, and I'm going to read that to you. And we're going to look at those words in the context of what this piece was about, because Mr. Depp's team wants to make you think that this opinion piece was designed to destroy Johnny Depp, that this was designed to maliciously talk about him and their life together. And it wasn't. So let's take a moment to look at this, and I'm going to read it to you, and I'd ask that you follow along if you can. But either way, let's take a look at what the piece as a whole says.

This is the piece that Amber wrote. "I was exposed to abuse at a very young age. I knew certain things early on without ever having to be told. I knew that men have the power, physically, socially, and financially, and that a lot of institutions support that arrangement. I knew this long before I had the words to articulate it, and I bet you learned it young too. Like many women, I had been harassed and sexually assaulted by the time I was of college age, but I kept quiet. I did not expect filing complaints to bring justice, and I didn't see myself as a victim.

Then, two years ago, I became a public figure representing domestic abuse, and I felt the full force of our culture's wrath for women who speak out. Friends and advisors told me I would never again work as an actress, that I would be blacklisted. A movie I was attached to recast my role. I had just shot a two-year campaign as the face of a global fashion brand, and the company dropped me. Questions arose as to whether I would be able to keep my role of Mira in the movies, 'Justice League' and 'Aquaman.' I had the rare vantage point of seeing, in real time, institutions protect men accused of abuse. Imagine a powerful man as a ship, like the Titanic. That ship is a huge enterprise. When it strikes an iceberg, there are a lot of people on board desperate to patch up holes, not because they believe in or even care about the ship, but because their own fates depend on the enterprise.

In recent years, the #MeToo movement has taught us about how power like this works, not just in Hollywood but in all kinds of institutions, workplaces, places of worship, or simply, in particular, communities. In every walk of life, women are confronting these men who are bullied by social, economic, and cultural power, and these institutions are beginning to change. We are in a transformative political moment. The president of our country has been accused by more than a dozen women of sexual misconduct, including assault and harassment. Outrage over his statements and behavior has energized a female-led opposition. #MeToo started a conversation about just how profoundly sexual violence affects women in every area of our lives. And last month, more women were elected to Congress than ever in our history, with a mandate to take women's issues seriously. Women's rage and determination to end sexual violence are turning into a political force.

We have an opening now to bolster and build institutions protective of women. For starters, Congress can reauthorize and strengthen the Violence Against Women Act. First passed in 1994, the act is one of the most effective pieces of legislation enacted to fight domestic violence and sexual assault. It creates support systems for people who report abuse and provides funding for rape crisis centers, legal assistance programs, and other critical services. It improves responses by law enforcement, and it prohibits discrimination against LGBTQ survivors. Funding for the act expired in September and has only been temporarily extended. We should continue to fight sexual assault on college campuses while simultaneously insisting on fair processes for adjudicating complaints.

Last month, Education Secretary Betsy DeVos proposed changes to Title IX rules, governing the treatment of sexual harassment and assault

in schools. While some changes would make the process for handling complaints more fair, others would weaken protections for sexual assault survivors. For example, the new rules would require schools to investigate only the most extreme complaints and then only when they are made to designated officials. Women on campuses already have trouble coming forward about sexual violence. Why would we allow institutions to scale back support?

I write this as a woman who had to change my phone number weekly because I was getting death threats. For months, I rarely left my apartment, and when I did, I was pursued by camera drones and photographers on foot, on motorcycles, and in cars. Tabloid outlets that posted pictures of me spun them in a negative light. I felt as though I was on trial in the court of public opinion, and my life and livelihood depended on myriad judgments far beyond my control. I want to ensure that women who come forward to talk about violence receive more support. We are electing representatives who know how deeply we care about these issues. We can work together to demand changes to laws and rules and social norms and to write the imbalances that have shaped our lives."

I know that was a lot, but that is the central issue in this case. Are those words, that Amber wrote, are those protected by the First Amendment? And the answer is, very clearly, yes. So let's talk about that article for a minute. First of all, the article doesn't mention Depp by name. It never once contains his name in that article. It is not about Amber's relationship with Mr. Depp. There are no details of any abuse in that article. The article is about proposed legislation and strengthening of government laws and policies designed to protect abuse victims and people who report abuse. That's what the article is about, and it was written in the midst of a social movement in which the American Civil Liberties Union, the ACLU, asked Amber to use her platform to speak on these important issues. And that's what she did.

To do so, she drew on her experiences as someone who had reported domestic abuse. And there's no question, there is no dispute, that she did, in fact, report domestic abuse in 2016. Depp's side admits that. She talked about her negative personal experiences and her reactions and opinions after being someone in Hollywood who reported abuse and the consequences that flowed from that. She talked about what she experienced in the days and months following reporting that abuse. That's what the article is about. The article isn't about Johnny Depp. The article is about the social change for which she is advocating and that the First Amendment protects. And so I hope you remember, as this

case goes on, that you saw from Mr. Chew only the three statements in isolation, because they want you to forget that. They don't want you to pay attention to what the article is about.

Now, if it had been Amber's intention to use this article to detail the abuse that she suffered and that you'll hear about over the course of this trial, believe me, the article would have looked very, very different. She could fill a book with those details. She probably would have started out by calling out Mr. Depp by name. She probably wouldn't have published it in "The Washington Post." She would have described in great detail the man who has described himself, the violent side of himself, as the monster. That's what she would have done. The monster. She would have told you about the monster. But she didn't. That wasn't the point of this article. And she was careful to avoid that, even having her lawyer review the article to make sure that it was okay, and she relied on that lawyer's advice, and you'll hear testimony on that during the trial. But because Johnny Depp brought this case and asked for it, all of that is going to come out. Just know that Amber Heard never wanted to unearth for the public who the real Johnny Depp is, but that's going to come out over the course of this trial.

I'd like you to also take into consideration who isn't here today. You don't see The Washington Post sitting here as a defendant in this courtroom. Depp didn't sue The Washington Post. He had no interest in doing that. He only sued Amber. He could have sued The Washington Post, they published the article. But he didn't, and he chose to bring Amber to court here in Virginia where she has no ties, has never lived, he's never lived, where they never spent any time, because he wanted to make her life hard. He wanted to ruin her life. He wanted to destroy her. That's what he did. And I wish I could say that that's surprising. It's certainly disturbing, but it's not surprising, because the evidence will show that, for years, all Mr. Depp has wanted to do is humiliate Amber, to haunt her, to wreck her career. That's what the evidence will show in his words. That's what he wanted.

But he made a mistake, bringing this case in Virginia, because you're the people who are going to hear this case, a qualified, prepared jury who respects the First Amendment. And with that, even though we've looked at the article as a whole, I'd like to spend a few minutes looking at the individual statements that were made, just as Depp's side showed you, because I think it's important to do that as well. Can we pull up slide one, please?

"Then, two years ago, I became a public figure representing domestic abuse, and I felt the full force of our culture's wrath for women who speak out." There's absolutely nothing false about that statement. First of all, the evidence will show that Amber did suffer domestic abuse at the hands of Johnny Depp, and it took many forms, physical, sure, but also emotional, verbal, and psychological abuse. It's all domestic abuse that she suffered at his hands. So that's the truth.

But what else is the truth is that, on May 27th, 2016, 2 years before this opinion piece was published, Amber walked into a courtroom in California, with bruises on her face that were given to her by Johnny Depp on that incident in May 21st, 2016, that Elaine is going to tell you more about, that absolutely were given to her, and she took out a domestic violence restraining order that she obtained from the court in California to protect herself. And she was, of course, a public figure. She's a movie star. She didn't want the paparazzi, the press photos. She got those, of course. Who wants to be photographed with a bruised face walking out of court? She didn't want that. And the evidence will show that. But she was a public figure, and two years before she wrote this article, she was a public figure representing domestic abuse. That is 100% true. And try as he might to take it away, Amber's freedom of speech gives her the right to say that. Can we pull up slide two, please?

This is the second statement. "I had the rare vantage point of seeing, in real time, how institutions protect men accused of abuse." Once again, that statement is 100% true. Amber did accuse Johnny of abuse, and she saw how he was protected at the same time that her career took a downturn and that he did everything that he could to try to wreck her career, as the evidence will see. But she accused him of abuse. That statement is true. You don't need to relive every intimate detail of their marriage. You don't need to decide what happened on any individual day of their marriage to determine that the First Amendment protects that statement because it is true. He wants you to forget that. Don't take the bait. Let's pull up the third statement, please.

Now, this statement was in the headline of the online edition of the article. "I spoke up against sexual violence and faced our culture's wrath. That has to change." The undisputed evidence in this case will be that Amber did not write these words, did not review these words, did not approve these words. That's how op-eds work. She wrote the article. She didn't write this headline. And for that reason and that reason alone, it's not defamatory. But here's the thing, like the first two statements, tragically, it's true. Amber did suffer sexual violence at the hands of

Depp. And Ms. Vasquez tried to minimize that and tried to make you think that it's all made up, but it's not.

You will hear in the most graphic and horrifying terms about the violence that she suffered. You'll hear that straight from her. She will get on the stand, and she will tell you that. It happened, and by taking out that domestic violence restraining order, by obtaining that from the court, she did speak out against it and all the other abuse that she suffered, and she said, "Enough is enough. I need to protect myself." She didn't want to do that. She didn't want to be forced to get that restraining order, but she did. She spoke out against the abuse by doing that. And the evidence will show that she did face her culture's wrath, perhaps, illustrated no more clearly by the fact that she's here today facing this lawsuit brought by an obsessed ex-husband hell-bent on revenge. That's why she's here. That's why she's facing our culture's wrath.

And as you consider whether these statements are true, I'd ask you to keep this in mind as well, the evidence will show that, in May of 2016, when she obtained the restraining order, Mr. Depp never denied the allegations, and in fact, he signed a statement that Amber hadn't made any false statements for financial gain. He signed a statement saying she hadn't made any false statements. And you'll see that in evidence in this trial. And it was only two years later, as his career was in free fall and her career was taking off, that he pounced, that he chose to bring this lawsuit, after saying that she hadn't made any false statements. And one thing that you'll be instructed at the end of the trial, that the Mr. Depp side will try to distract you from, is that any damages that he suffered and any defamation has to flow from that 2018 opinion piece.

This case isn't about the statements made in 2016, even though they're true. This case is about the December 2018 opinion piece. That's what the case is about. And I have to say, it's pretty ironic. It's pretty ironic that a piece that briefly discussed Amber moving on from Johnny Depp, that briefly discussed her life experiences after Johnny Depp, is the very vehicle that he uses to try to keep her from moving on, to try to keep her from living that life, rather than give her her life back, rather than take personal responsibility for his own actions. It's ironic that he uses that piece to do that. But like I said, it's not surprising, because you will see clear and graphic evidence of his intentions dating back years.

Now, in five or six weeks, Elaine or I will get up here at closing argument, and we'll remind you. We'll remind you what this case is about. We'll remind you that this case is about one piece of paper, Amber's words in this article that wasn't about Depp, wasn't about her

marriage, wasn't about her relationship, that it was about life after that. It's about the freedom of speech. It's not about the soap opera that Depp will turn this case into. It's not about who you like better. It's not even about whether you agree with the words that she wrote. It's about her right to speak them.

Now, before I sit down, I'd like to briefly discuss some of the damages that Depp alleges in this case, because he can't win the case if he can't show damages, and the evidence will show that he has not suffered one cent of damages from this op-ed, not one. Now, make no mistake, Johnny Depp's reputation is in tatters. His career is in free fall. But it's because of problems that he created, problems that he is responsible for, and he's here in court asking you to blame Amber for them. But it's not Amber's fault. They're from the choices that he made. You'll hear a lot of evidence in this trial about those choices.

You'll hear evidence of crushing drug and alcohol abuse. You'll hear evidence of Depp taking more drugs than you can count. You'll hear evidence that before one of the instances of abuse, a cross-country plane flight in May 2014 from Boston to Los Angeles, when he kicked Amber in the back on a private jet. You'll hear evidence that he had had no food for days, that he had used cocaine, that he had had half a bottle of whiskey, that he had had countless Red Bulls and vodkas, that he had taken pills and, on the plane, decided to top all that off with two bottles of champagne, you'll hear evidence of that, and he blacked out on the plane, and he abused Amber and didn't remember anything about it when he woke up. You'll hear evidence of drug binges with his good friend, Marilyn Manson.

You'll hear evidence of that three-day blackout in Australia that Ms. Vasquez tried to minimize and tell you was false, a three-day blackout in which he abused and sexually assaulted Amber all because she had the courage to confront him about his drinking. Imagine that, a concerned spouse confronts her husband about his drinking and gets rewarded with that. That is what the evidence will show. That is what happened to my client. That three-day blackout that led her to be so in fear for her life that she barricaded herself in her room, that same three-day blackout that kept him from being able to do what he was in Australia to do, which was to film "Pirates of the Caribbean 5." His behavior on that trip, both before the blackout and during it, kept him from being a reliable actor. He showed up late to the set, and after that blackout, he was gone from the set for a long time.

Now, he did cut off his finger, but the evidence will show, my client did not do it. And just imagine this, what Ms. Vasquez is trying to get you to buy, is that Heard somehow developed a Major League-level fastball and cut off his finger with a bottle. You'll see the evidence. You'll see that that doesn't make any sense, and you'll hear from Ms. Heard's experts who'd testify, including orthopedic hand specialists who'd testify, there was no way that that happened. You'll also see pictures of what Mr. Depp did after he cut off his finger, when he dipped it in blood and paint and wrote graffiti all around the house. That's what you're going to see he did. And you're going to ask yourself, "How can someone that is blacked out, how can they deny that they abuse someone? How can they deny what they were told that they did?" He has no credibility when he gets up here now in this court and tells you he didn't do this or do that when he was blacked out. So just remember that. Those were problems that he created.

You'll hear evidence that the same addictions that led him to abuse Amber also led to the demise of his career as an actor. Like I said, as you saw with Disney, as the evidence will show with Disney, he was unreliable as an actor. And those same self-destructive tendencies led to financial distress. Quite simply, he was running out of money, and that distress fueled his abusive tendencies toward Amber. And it led the public to think less and less of him.

And you will see a parade of witnesses who testify in Johnny's case that all have one thing in common, they all rely on him, they're all on his payroll, for the most part, or they rely on him for some sort of luxury in their life. And you'll see that of these witnesses. So in a lot of ways, Amber previewed the parade of witnesses when she said in her op-ed, and I'm going to read from it and quote it here, she said, you remember when I said this, "Imagine a powerful man as a ship, like the Titanic. That ship is a huge enterprise. When it strikes an iceberg, there are a lot of people on board desperate to patch up holes, not because they believe in or even care about the ship, but because their own fates depend on the enterprise."

Remember that as Depp's witnesses take the stand, none of whom know what happened behind closed doors between him and Amber, none of whom can testify to that. But remember that these are people who care about their own financial well-being, just as they were previewed in that article. And they know what happens to people who stand up to Depp. They know what happens, because they've seen it. They've seen it with Amber, and they've seen it with other people in his life who had the courage to ask him to change and who he lashed out

against. These are people who helped enable the man who describes himself as the monster. Make no mistake, this man's poor choices have brought him to this courtroom, his own bad behavior, his own refusal to commit to sobriety, his own violence, his poor choices. And the people who have spoken up against it, they're the ones that have suffered the consequences.

You'll hear evidence that he fired his long-time agent, that he got rid of his business managers and his law firms that had represented him for years. And no one has suffered from his refusal to take accountability more than Amber Heard. You'll hear evidence that, two years before the op-ed, two years before that, Mr. Depp brought someone else into his life who helped convince him to blame other people. That man, Adam Waldman, who Ms. Vasquez introduced you to, had never met Mr. Depp while he was in a relationship with Ms. Heard or while he was represented by his agents or his former business managers. But he convinced him that all these bad things that are happening in his life, he helped convince him of this, were other people's fault. And you'll hear evidence of that. Rather than take responsibility for cleaning himself up, Depp chose to blame other people.

That's why we're here, and the evidence will show you, crystal clearly, that the op-ed had nothing to do with damages that he's suffered. He's going to try to make it sound like this caused him to lose *Pirates of the Caribbean 6*, which is a movie that hasn't been made but that Disney wasn't going to cast him in because of Amber's article. But there's no evidence of that. The evidence will actually show that months before the op-ed, it was reported that Disney was considering dropping him from *Pirates 6*. The evidence will show that Disney had a dossier on him that had articles from the press, had other information about Mr. Depp, and they didn't have this article at all in their files, didn't register with them, just as it didn't register with the public. The public had known since 2016 what Amber had to say about Johnny Depp. This didn't change any of that. The evidence will also show that he said he would not make *Pirates 6* even if Disney paid him far more money than he'd ever made on a film. That's what the evidence will show.

So any damages that he's suffered in his career are not because of this op-ed, and it's time to make Johnny take responsibility, to tell him, "Mr. Depp, stop blaming other people for your self-created problems, to take responsibility for your own life." And it's up to you, ladies and gentlemen, to make him do that. It's up to you because you are uniquely qualified to do that. No one else has the power to do that, only you, to tell him,

"Enough is enough," to stand up for the First Amendment, to stand up for the truth and Amber's right to speak it. Thank you.

Judge Azcarate: Thank you, Mr. Rottenborn. Ms. Bredehoft. Okay.

[01:16:39]

[silence]

[01:17:07]

Ms. Bredehoft: Good morning, still. It's good to see you all again, and thank you, again, very much. Ben told you we will be relying on the evidence rather than the hyperbole and the personal attacks, and he was right. The evidence in this case, simply put, is overwhelming and compelling. In six weeks, we're going to try to show you as much as we possibly can. There are many, many, many photographs. Now, you heard Ms. Vasquez try to say, "Uh-oh, you can't trust those. It's not the originals." She's got that wrong. It's not from the original devices. Ms. Heard took all kinds of photographs, and her friends took photographs, and all of those remained on the cloud. And all of them have been imaged, and all of them have been examined by their IT experts, and they cannot discredit one photograph. Then, she says, "Oh, and it's got a photo editing thing." Well, all iPhones have the photo editing. It's where you can make it a little lighter or darker, you can move it to the center or not. That doesn't discredit the photographs, and we will have an IT expert who will testify that all of these are legitimate, authentic photographs.

Not only that, but Ms. Heard produced all of her different devices over the years, including her most recent laptop, and they were pulled from many, many sources, and all of them are identical. So if she was going to go in and try to manipulate, she would have had to do it everywhere. And Ms. Heard will tell you, she doesn't have that level of talent. There may be a couple of you on the jury who have that talent. She does not have that talent. They're all very legitimate photographs. And listen carefully to the evidence from the experts, and you will find every single piece is authenticated and is true, and they show bruises, and they show cut lips. They show hair pulled out of her hair. They show all kinds of...they show two black eyes when he head-butted her. Those are all going to be there.

We also are going to show you a video, and I'll talk about the time frame of it. Ms. Heard took that on her iPad, and it was one day when she was in the kitchen with Mr. Depp, and it was February 10th, 2016. And he's on a tear, and he's going around, he's yelling at her and being abusive to

her, and he's slamming the kitchen cupboards and their glass. And you can hear them rattling, and you can hear them breaking. Then, he goes over with a big glass of wine, and he has a huge bottle of wine, and he pours more in there. And then she says, "Did you drink all of that?" And then he sees that she's videotaping him, and bam. That's going to be a pretty graphic one for you to see.

Then you're going to hear audio tapes, which are pretty significant too. Ben told you about the May 2014 plane, Boston plane incident we call it, where he kicked her, where he was so drunk and he blacked out. Well, Amber audio taped him when he went to the back of the plane and passed out and was moaning loudly. You will hear that. You will also hear some other audio tapes that are very significant, one of them in Australia. At the end of the three-day hostage situation, you will hear, apparently, Mr. Depp turned on Ms. Heard's iPhone. She was never allowed to have a password, by the way. He would never let her do that during their relationship. But he must have inadvertently turned it on. There's five hours of audio tape. It's during the cleanup of all the broken glass and the liquor, and the urine, and the bloodstains, and everything else in that house. And you can hear his handlers talking about it. You can hear them talking about trying to find his finger, and you can hear them say, "She's stone-cold sober." You will hear all of that. It's very, very significant evidence.

What this is going to tell you is the story of a very different Johnny Depp. It's one who is always, always...well, I can't say always, because he has the charismatic side that Amber fell in love with, but he has an enormous amount of rage. You will see the medical records and hear from the psychiatrist that talked to him for a while in 2014 where he admits that he has rage, that he's like a demon, that he views his wife, Amber, like his mother and his sister that he hates. That's what you will see. You will see that. And it'll be fueled by the alcohol and the drugs. Ben told you a little bit about that. You're going to see a list of his prescription drugs that his concierge doctor and team who charge him \$100,000 a month and have since 2014. And they are still his concierge doctors. That's the list of the medications he takes in one day that they prescribe. That doesn't include the cocaine. It doesn't include the Ecstasy, the MDMA, the mushrooms, and all of the others. Now, it's during these rages that Mr. Depp engaged in verbal, emotional, physical, and sexual abuse of Amber.

Let me introduce you to Amber, the lesser-known person here, and I know, when we were doing the voir dire, none of you had even watched as much as three of her movies. So I'm going to tell you a little bit about

Amber. She's 35 years old. She's from Austin, Texas. She grew up outside of Austin, Texas. She has a daughter, Oonagh, who turned one last week. Amber grew up in an area...her father was a construction worker, primarily, a painter, but he would break horses as part-time. They lived out on a ranch area. Her mother, Paige, who died 2 years ago at age 63, dropped out of medical school to marry Amber's father. She worked for the state of Texas in internet communications. They grew up very poor. Amber has a sister, Whitney, who's 16 months younger than her, and you will see and hear from Whitney later, because unfortunately, she also witnessed some of the abuse.

Amber rode horses with her father. She tried to work with him to help him break the horses. She remembers having a broken arm at least four times, being in casts during that time. But there were some things she learned from breaking those horses that was very significant. Her father taught her she couldn't show fear, she couldn't show pain, and she couldn't show emotion. That's how she could break those horses. It's significant for you to know that so you can understand how Amber could have remained in this relationship with Mr. Depp for as long as she could and the dynamics of some of the abuse you're going to hear about, because that's what would be her instinct, is to stand up and not let him show that he's caused the pain, that he's caused the fear, that he's caused the humiliation.

You'll hear about a long line of jobs that Amber started from back, you know, age 12, as soon as she could, working in a soup kitchen...well, that was volunteer, but then she took all kinds of miscellaneous jobs, lifeguards, everything else, trying to improve herself. She's not somebody who had a great break. What happened was she got recognized by a Hollywood agent who expressed some interest in her. She took her \$180 that she'd saved up, and she went to L.A. That's all she had to her name. The testimony would be she worked all kinds of different jobs when she was in L.A., anything that she could get. And she would go on...but she didn't have a vehicle, so she would go on buses, and she'd go up to six different auditions in one day.

She'd have a map, and she'd have the bus, and then she would just go around. She had a big sweater so she could change underneath it to whatever the role was so that she could get things. And she wasn't going for, you know, famous actor roles. She was taking one-liners. She was taking extras. She was doing anything she could to make money to survive. And then you know what she did with it, she gave a bunch of it back to her parents. She started helping support them. Then, when Whitney graduated from high school, she brought her out to L.A., and

put a roof over her house, and put her through community college. She took care of her family with what she made.

When she met Johnny Depp in 2009, when he hired her for *Rum Diaries* to star across from him, she felt like she was pretty successful. She'd starred in some roles. She had an apartment. She had a vehicle, a Mustang. She could go to Starbucks. She could afford Starbucks. She viewed herself as doing pretty well at that point. Now, during "*The Rum Diary*," she got to know Mr. Depp. Not true that she was pursuing him or anything else. She was in a long-term relationship with Tasya van Ree, and he was in a long-term relationship with Vanessa Paradis. Neither of them had any kind of romantic relationship at that time. When she departed from "*The Rum Diary*" in 2009, Johnny started pursuing her. In fact, he sent her a number of gifts, one of them was a guitar, and she returned them.

Now, two years later, fast forward, that's when the press junket started, and that's when she had to come back and meet with him, and they ran on the press tours. At that point, she had ended the relationship with Tasya van Ree, and he said he had ended his relationship with Vanessa Paradis. So during the press trips, that's when they started dating and, by both accounts, fell madly in love. She loved the side of Johnny that we see in the movies, the charismatic one, the charming one, the generous one. That's the man she fell in love with. But sadly, the monster came in the way, and that monster would come out when he was drinking and when he would take the drugs.

Amber will never forget the first event of abuse. She was sitting in his house in Sweetzer, on the sofa, and he was across from her. And they were talking about a tattoo that he had that had had Winona, Winona Ryder, forever. He had altered that to "Wino forever" after he broke up with Winona Ryder. Just an aside, he had "SLIM," which was his nickname for Amber. When they broke up, he turned it to "SCUM." But in any event, he had that on there, and Amber thought he was making a joke when he was talking about it. And she laughed. And he slapped her. Now, you see the rings that Mr. Depp has on, and it hurts when he slaps. And she was stunned. She had no idea what to think. And she kind of laughed thinking, "Well, maybe that was a joke. What just happened?" And he slapped her again.

And then she just froze and just looked. And then he hit her again, and this time, it knocked her right off the sofa, onto the ground. And she remembers, her face was in this dirty, filthy carpet. That's what she remembers and fixated on, the dirty carpet. And she's thinking, "Oh my

god, I have to leave. I have to leave. But I love him. I have to leave, but I love him." And she sat there for the longest time. She laid there for the longest time. Then, Johnny came off the sofa, got on his knees, started crying, told her he was very, very sorry that he had done this, it would never happen again, and he said some very significant words, "I thought I had put the monster away for good." That's what he said to her that day.

Well, Amber ended up leaving that day, and she went out to her car, her Mustang. And she remembers that it was cold, and she sat in the car for the longest time. And she remembers watching her breath, because it was cold, and she was thinking, "I have to leave him. But I love him." She just kept thinking that. She finally drove away. But Amber made the mistake that millions before her and millions after her have who are victims of domestic abuse, she chose to stay and try to fix the problem and thinking that she could do that. So she stayed.

Now, Amber was also...she grew up in an abusive family. Her father abused her mother, and sometimes she and Whitney. So she had that cycle in there, just as you've heard that Johnny had that cycle in his house. And so what's normal to them is a little bit more difficult than some of us can understand. You will hear expert witness testimony about the cycles of violence and what happens with these people, and how they react, and all the dynamics of thinking they can fix them. She thought, all the way through, she could fix them. If she can just get him sober and clean, then everything was going to be that wonderful side that she fell madly in love with. And she kept trying, and she kept trying.

She went to Al-Anon meetings. She went to therapists. She tried to do couples therapy. You'll hear about their tape recording sessions to try to resolve fights or de-escalate them so he wouldn't get mad at her for anything. But you'll hear that he gets mad at her for all kinds of things. He didn't want her to work. She's a budding actor who wants to be out there and succeed, and he doesn't want her to take roles. He starts controlling what she wears. He starts looking at her lines when she tries out for places. He nixes any romance scenes, sex scenes. He gets mad and accuses her of sleeping with every single one of her co-stars. It became a cycle of that, a control, as well, emotional abuse, as you go.

But what's also significant in that is the property damage, and that's a hard one for Mr. Depp to be able to escape when he's claiming that he's such a docile thing and that it's all Ms. Heard. You're going to see pictures. He writes on mirrors horrible things to her, writes on lamp shades, you know, on clothing, on countertops. In Australia, when you

heard Ben talk about Australia, he wrote...the third day, as Amber comes out after she's barricaded herself and gone through a lot, and I'll back up on that in a minute, she comes out, he's got mashed potatoes spread across the top. He's written along the wall of the staircase going down all kinds of nasty things about her, and Billy Bob Thornton, the last one she was in a co-star with, and you know, fucking ambition, and all kinds of things like that. Then, he's written on the lampshades downstairs, and then he's got more on the mirrors. And then, on top of it, you've got all the broken glass everywhere, and you've got the liquor everywhere. And it's just...and then he's urinated...tried to urinate messages to her.

That's the Johnny Depp that's the other side. Now, you're going to hear that Amber tried to protect him, all the way through. She didn't want the public to know this. She didn't want his kids to know this. And so she didn't tell people about it.

So let's go back. The first event that I told you about was 2011. And how do we know that it was in 2011? Because Amber was going through her therapist, Bonnie Jacobs, and Bonnie Jacobs has therapy notes of her sessions with Amber. And in those therapy notes, she chronicles the first time that Amber tells her that Johnny hit her, and it goes through into 2012, 2013, 2014. And you will see, and you will hear from Bonnie Jacobs, her saying, "You know, this is a cycle of violence. This is a cycle of abuse. You can't enable him. You need to stand up for yourself." Amber will testify about how Johnny would get so drunk and so drugged out that he would vomit all over himself and, worse, lose control of his bowels. She would clean him up. And you'll see Bonnie Jacobs, in these notes, saying, "Don't do that. You're enabling him. Don't do it. Leave him there." But what would happen was his handlers would then take care of him if she left him.

So that's the story you're going to hear on that. Let me just tell you about a few of the events, and I'm going to start in Australia. That's the three-day hostage. She gets there. Now, you will hear Mr. Depp would testify, under oath, that for 15 to 18 months before the March 2015 Australia event, when he's there filming, that he's been sober. Clean and sober. Then, you'll see all the text messages for the last 18 months in which he's scoring drugs, in which...you'll hear testimony from people in which he's gotten drunk and, you know, taken all kinds of different drugs, the whole time. He doesn't get clean and sober, but he claims that he was clean and sober. That she came there...this is a month after they just got married.

She flew in from filming "The Danish Girl." She's there, and he claims that he was just sitting there calmly, and she was haranguing him. So he took a shot glass of vodka, and when he did that, she got mad, took the bottle of vodka, it was 8 to 10 feet, about where I am from you, and hurled it at him, and it happened to just take off the bottom part of his finger. And then he says she came and burned a hole in his cheek. The testimony is going to be that he self-mutilated on a number of occasions and burned himself in the cheek and also cut himself. But Amber never did that. And you're going to hear from the experts testifying about this finger injury and how fantastic this version is.

But the other part of it was he was with Marilyn Manson for the week before scoring on cocaine. You'll see text messages of him getting it from his handlers, the cocaine and the liquor. And you'll hear so much before that. But Amber gets there, and instead, what he does is he takes 8 to 10 tablets of Ecstasy, almost immediately. And the next three days are just a cycle of a very, very, very violent activity by him. Amber keeps trying to calm him down. She tries to get him to eat. She tries to get him to sleep. She tries to do these things. And he would just, at different...he was, you know, at times, delusional, paranoid. He would be, you know, mad at somebody else. Then, he'd be mad at her.

And by the way, we'll talk about the prenup, but he called her lawyer, who she had because she wanted to give him a prenup, and then they got married too quickly, so she was going to give him a postnup. He called the lawyer from Australia, called her a bitch, and fired her. You'll hear the testimony from the lawyer on that. That's the type of Johnny Depp that was there. He didn't want the postnup, he didn't want the prenup, but now they're going to tell you that it was her that was mad. You're going to hear...she had a lawyer, and she was cooperating completely on that.

So, as you go through those three days of Australia, some pretty horrendous things happened to her. He rips off her nightgown. He has her jammed up against a bar. He has hurled bottles and bottles at her. He has dragged her across the floor on the broken bottles and the liquor. He has punched her. He has kicked her. He tells her he's going to fucking kill her. He fucking hates her. He's pounding at her, pounding her. And then he penetrates her with a liquor bottle. That's the Johnny Depp that you're going to hear about in this case.

Now, after that, Amber goes to the airport. What does she do? She buys a book by a psychiatrist who's talking about couples therapy. She's already trying to figure out a way to fix it again, fix this marriage that's

only a month old, and her husband has just done these horrible things to her. Now, they go back to L.A. He's got to get his finger fixed. So he has to stop filming Pirates 5. They get there, and there's another fight in just two weeks from there. He's still using, at this point. He's still drunk. But Amber finds on a TV screen, his monitor, she finds pictures of another woman, naked pictures of a woman, and text messages, which show that he's clearly having an affair. She gets extremely mad. Amber can be jealous too. She can get angry. She's half his age, and she's defiant, and we're not going to say she's perfect, she was mad as can be when she saw that. And she confronted him, and the two of them were screaming at each other.

Now, her sister, Whitney, happened to be in the house. She was summoned. She literally was awakened to come and try to resolve this fight between the two of them. While she's there, Johnny starts hitting Amber. And Whitney ends up getting in between them, and Amber thinks that Johnny's going to throw her down, push her down the stairs, because he's in that position. So Amber actually gets up and punches Johnny in the face. She'll tell you that's the only time she has ever laid one on him, you know, in an aggressive manner, but it's after he's already been hitting her, and it's in defense of her sister. And she'll admit, she got him that time, and she actually did have an impact on him. She'll testify about how many times they were in their fights, and she said...you know, she's almost half his size, so you know, she said, "If I pushed him, he doesn't move. He pushes me, I go flying across the room."

There isn't any, you know, ability on her part to be the abuser. What she'll also tell you is it took her a while to ever fight back, that many times before, that she would do what she did when she was breaking the horses. She wouldn't show fear, she wouldn't show pain, she would look at him, she would just be defiant, and all it would do is piss him off more. She'll tell you that she tried everything. She tried everything, you know, from trying to be nice, trying to get away from him. You know, she would throw things in his way to get him from running after her. She would try to, you know, flail back. She would use her hands and legs, and she would go and try to fight him. She'd run into a room and try to barricade and push his hands and everything out of there. She'd try all those things, but she couldn't figure out what could get him to calm down.

I'm going to fast forward now to the next one, and that is...I'm going to jump you up to after the stair incident and Johnny had to get surgery on his finger. That's the longest period of time he stayed sober. It was

almost three months. You're going to hear that he has never been through rehab, even though he has been a lifelong drug addict and an alcoholic, never has he gone through a rehab plan. Instead, there's twice that he went to some New York hospital and did a cleansing. One time, it was for three days, and one time, it was for five days, and that's it. He's never made any effort, whatsoever, to get sober or stop the drugs. But this particular time, he did, for almost three months, and you'll see the text messages. We're going to take you through this whole story and all the text messages and all the emails and all the testimony that you're going to get.

So fast forward to December 2015, that was one of the worst. Australia was pretty bad, but this one was even worse. In this particular occasion, he gets angry for some reason, and he starts dragging her by her hair through the apartment, kicking her, punching her, tearing her hair out. At one point, she gets up and looks at him, and he head-butts her. And she gets two black eyes from it. Then, he goes and grabs and drags her up the stairs, puts her on the bed, puts his foot and knee in the back of her, and he continues to punch her, telling her he's fucking hating her, and he's fucking going to kill her. And he's got his boot stuck in the bed frame as he's doing it, and the force of what he's doing to her causes the bed frame to splinter. That's how much force. She is suffocating in the pillow, and she believes, truly, she's going to die on this one.

She wakes up to her friend being there. She doesn't know how long that she was unconscious or subconscious. She doesn't know. But Johnny was gone at that point, and her friend is saying, "Are you okay? Are you okay?" You'll see the pictures of all of this. You'll see the pictures of the hair. Imagine how much that must hurt, the hair that's out on the ground. And you'll see the pictures of Amber.

Now, here's the ironic thing. The next day, she's got to be on the James Corden show. And you can see the text messages, she's not sure if she can go, she's worried, she's got two black eyes, she's got a split lip, she's got bruising, she's got hair missing. But her friends rally with her. She's got a makeup artist. You're going to hear from Melanie Inglessis, who does the best job of makeup you could imagine to get her through the James Corden show. And she does it, but you'll see the pictures, the before, and you'll see them then. And that's the resilient Amber who says, "I'm going to go do this anyway."

Now, her friends, she tells...you're going to hear about iO Tillett Wright. He was in New York. She texted him and said, "Johnny beat me up really good this time. Can you help?" And he says, "I was filming

something. I stopped. I got the first flight out of there. I'm flying from New York back to L.A. I see her on the James Corden show. I can see the swelling, because I know her well. I can see the swelling." And then he said, "Somebody touched her, and she flinched on the show." He said, "That's not like Amber." He got there. They hadn't cleaned up all the mess. He sees the hair, he sees the splinter, and he sees all of the other things. And he is so upset. He was a good friend of Johnny's as well. He'll testify about all of his friendship with Johnny. But he put his foot down on that one and said, "You need to have consequences. You cannot do this to Amber anymore. I am not your friend anymore."

Now, there were several people that were supposed to go to Johnny's island, the Bahamas island, in December, for Christmas. He was going to bring his two kids. He'd invited Amber's parents, who loved Johnny. And unfortunately, her father used to drink and do drugs with Johnny a lot. And he was also going to take Rocky, her friend who lived next door in a penthouse, and her fiancé, and Rocky's parents. Imagine being able to go to a Bahamas island for Christmas. What a cool thing to do? But they all were so upset, what he did to Amber on December 15, they said, "No, we're not going. We're not going to condone this. We're not going." But he talked Amber into going. He guilted her into going, "I'm going to be with my kids. Please come. I'll be better. I'm going to get better." Amber went. And then he ends up assaulting her even there and sexually assaults her even there.

Now, you'll see a video from them of the Bahamas place that they stayed in on his island, and the video just conveniently leaves out the wardrobe in the bathroom where he committed the assault. It just goes around and makes it look like it's one room, and his kids were there, and there's no way they could have done that. But you'll hear the testimony, and you'll see the pictures.

Then, from then on, things really were bad for Amber, and she was really considering leaving him at this point, and she was talking to her friends and confiding. You'll see, you know, the medical records. And in February 2016, I told you, you'll see that video, that same night before the video, he called iO Tillett Wright and left him a voicemail message that he said was just absolutely delusional. It was crazy. He was pretending like he was the property management. It was just an insane call. And then, the next day, we have the picture of the video.

Then, we get to April 30th, or April 21st, 2016, Amber's 30th birthday party. She was going to turn 30 the next day. Pretty big event. Her friends had a tape that they put together of everybody giving her

tributes. Johnny doesn't participate. They have a dinner and a party for her that night. Johnny says, "I have a business meeting at 7 p.m. I'll be there after that." What kind of business meeting do you need to have at 7 p.m. when your wife turns 30? But that's Johnny, right? And he can't say that it was an important financial one because he'd fired his financial manager the month before when, as you heard from Ben, he was blaming him for all his financial problems. So he is the problem.

So he shows up late, drunk, drugs. And after everybody...and he's even drinking while he's there, and he's telling the other friends, and you'll hear from one of them, that he's saying, "Here, hide the bottle from Amber. Hide the bottle from Amber." When they all leave, she expresses her disappointment. He gets mad and assaults her again, including sexually, assaults her. Then, he goes away, and he doesn't come back for a month.

Now, this is an important event, May 21, 2016. This is the last one, and this is the final straw that leads out to the DVTRO, the domestic violence temporary restraining order. So he says he's coming over to get some clothes. He's going to go out on tour. She says, "Okay." He comes over, and his mother died the day before, and he's already in the state. He's been drinking, he's clearly high, and he comes in, and he's got on his mind this obsession that when she, on her birthday...go back to her birthday, the next day, she and her friends went to Coachella, but his housekeeper had come in to clean after that. Always did. And the housekeeper found some, you know, feces on the bed and had been upset about it and taken a picture and sent it to him.

So all of a sudden, a month later, he's got it in his head that Amber has conspired with her friends to defecate on the bed. It's human, not dog, even though they got two dogs, and one of them has major problems. You'll hear about Boo and Pistol. And somehow, Amber was doing this so he would get back there and find it, even though he had no intention of coming back and even though the housekeeper was there. And he won't lose it. He won't get rid of it. He's just obsessed with it. Then, he decides that it's iO Tillett Wright who did it, even though iO wasn't at the birthday party and wasn't even in town. So Amber gets iO on the phone, iO is in New York, and she says, "This is what Johnny says. Can you please just calm him down? Tell him this isn't true. Tell him we didn't do it." I don't know the conspiracy here.

And iO was thinking, "What?" And you'll hear from iO, he'll say, "Amber's fecal-phobia. I mean, she can't even, you know." She's so embarrassed about that stuff. She would never conspire, never do anything like that to

him. So they're kind of laughing at the absurdity of it, and that was the biggest mistake, because that triggered his anger. And then he started after...started hitting Amber. He took...grabbed the cellphone from her, wound it up, and bashed it into her face. And you will see the pictures, you will see the bruise there, and you'll see the form of it there.

Now, iO was very, very upset. He's worried, because he knows about the December 15, 2015, and he says, "Amber, get out of there. Get out of there. Are you safe? Get out of there," as Johnny's storming around. And he calls Rocky who lives next door, and then he calls 911. And it's not clear, you know, whether Amber said, "Call 911," or he said, "Call 911," but he calls 911. But he's in New York, and he's genuinely concerned for her safety. So he calls 911 there, and he calls a friend in L.A. and says, "Please, call 911 and just tell them this so they get somebody there, so we can get somebody fast. I don't know what's going on."

So the police are called twice, essentially. And now, here's what happens next. Johnny goes around, and he trashes the apartment before he leaves. He loves to do that. You're going to hear about his penchant for that. He does it a lot. And you'll see a picture of him in the elevator afterwards, leaving with his bodyguards, and he's a little agitated there. And the police are called. You will see pictures of Amber, with metadata on them, both before, during, and after the police officers are there. But what happens is Amber calls her attorney, the one that she had consulted after the December 15 event, and the attorney says, "If you press charges, they'll arrest him." And Amber says, "I can't have that happen. I don't want his kids to know about this. I don't want the public to know. I can't have that happen."

So when the police show up, she refuses to cooperate. She says, "On the advice of my attorney, I'm not going to cooperate." But her friend, Rocky, whose fiancé was there, Josh, at this point, he takes them around and shows one of the police officers all the property damage around the house as well. And the police officers say to him, "Look, she's got the red mark on there, you know. If you just give us the name, we'll go get him." And he says, "I can't. She won't let me." So they leave.

Now, here's what happens and creates all of the, you know, noise here that you're going to have to deal with. So the police officers don't make an incident report. They don't take a report. They don't document the property damage. They don't document the facial damage. Instead, they go out, and they write on their CAD. That's their little system in there. They write, "Verbal dispute only. Victim uncooperative." That's their

language for, "We don't have to write a report." You'll see that the police officers have another one later that night, another, and they put, "Verbal dispute only." That's their magic language.

Now, that's notwithstanding that you will see these pictures, but Amber wasn't cooperating with them, and they were quite convinced she wasn't going to. So, as many domestic violence, you know, calls that they take, they're not going to....this is one that they figure, "It's gone." Now, the other police officers come two hours later. They've cleaned up the place, at this point. They don't know that these police officers are arriving, but when they do arrive there, they tried to discourage them even from coming in. Josh answers the door and says, "No, the other police officers were already here." And they say, "No, but we just have to see her." And they have body cams, by the way, so you'll see the body cam footage of this. So they go through, and they do that. And one of the significant things is you'll see on the CAD that the two police officer sets are communicating with each other, and that first set says, "I don't think she's going to change her mind." And they know who the officers were the first time. Because they say Officer Saenz. You'll hear this, and you'll see it in the body cam footage. Amber says, "No, everything's fine. You can see on there." And they leave.

Now, the reason this is so significant is what they have done with this in creating...and that's part of the counter claim. And their version of the reality is that Amber calls the cops, then they don't see any injury, so they mess up the place, splash a little wine, and then call another set of cops. Does that sound like the situation here? No. No. And it's really important to look at the evidence and think about this. You'll hear from many...actually, I don't know how many of the police officers we'll put on, but we have, you know, between four and six LAPD police officers and experts who will say those police officers, even when she declined to cooperate, should have taken a report. They should have documented it. That was police policy.

So when faced with this big public DVRO and all of the publicity later, now they go back to the police officers and say, "Hey, wait a second, you didn't take a report. You said it was a verbal dispute only." They're stuck, you know. If all of that was true, and they admitted it was true, then they violated policy by not doing the report, because they were supposed to take a report. So the police officers chose the other and said, "No, there was no evidence." But you're going to watch it. You're going to see it in real-time. You're going to see it on metadata.

So Amber goes to get the DV, the domestic violence, TRO. You're going to see the letter that her lawyer wrote to Johnny Depp's lawyer that week, telling them that that's what she would have to...she was going to do if...but giving them opportunity here to be able to resolve it, to get a mediator, you know, just make sure that she's safe, that she can stay in that residence until they figure things out, that she can drive her vehicle until they figure it out, you know, some attorney's fees, whatever. You're going to see the letter. So they knew, and it says right in there, she's going to go in on Friday. They chose not to go. They keep saying ex parte, but they chose not to appear, and they knew she was going to appear.

Well, Amber didn't call TMZ, but somebody called TMZ to take all those photos that day. Now, you also heard them say that all kinds of people saw Amber that week, and she didn't have any bruises on her face. Well, let me show you this. This is what Amber carried in her purse for the entire relationship with Johnny Depp. She's an actor. Do you honestly think she would have left her apartment ever without makeup? Do you think that she ever would have wanted other people to see her bruises and her cuts?

This was what she used. She became very adept at it, and you're going to hear the testimony from Amber about how she had to mix the different colors for the different days of the bruises, as they developed in the different coloring, and how she would use these to touch those up to be able to cover those. She also used concealer, foundation. You'll hear it from a makeup person that Amber didn't even leave her bedroom without having foundation on. And one of the people that was at the building testified, he said, "She had makeup on," and it would have covered that bruise. So that's the testimony on that.

Now, let me talk about the divorce just for a moment. So they go through. They have the two months of trying to resolve the divorce. Ben already told you that they signed a joint statement in which Mr. Depp admits that she did not make any of these allegations, falsely, and not for financial gain. But they brought up the donation, so I want to talk to you about the donations for a moment. Now, here's the story. Amber didn't have a prenup. She didn't have a postnup. She was more than willing to do that, but as I told you, Mr. Depp fired her lawyers and said, "Only till death, that's the only way we're going to part is through death. We don't need a postnup. We don't need a prenup." That's Johnny. And it's true, his advisors were all telling him, "Get one." And she said, "I'll get one," and she hired a lawyer.

But anyway, she didn't have a prenup. So what you're going to hear is that meant, no matter what, whether it was abuse, adultery, irreconcilable differences, abandonment, doesn't matter, she is entitled to 50% of everything during that marriage. Well, he did Pirates 5, and he did 2 other movies during that time, and you'll see that he made \$65 million during those 2 years. Half of that is 32.5. Amber didn't want that. You'll see a letter...you'll see an email from her lawyer that she forwarded on to her agent, who became Johnny's agent later, saying, "I want you to sign this because you're entitled to a whole lot more than 7 million. And I don't want you to come...basically, I don't want you to come back and sue me for malpractice." That's what her lawyer tells her.

And then, her lawyer says, "I offered them even less than they...I demanded less than they offered," in other words, the 7 million was less than Mr. Depp's team was even offering to her. And she said, "I just want to be left alone. I just want to get out of this marriage. I don't want it. I'm not doing this for financial gain." So she didn't take the money. So she said, "I'm going to donate all 7 million of this to charity, half to ACLU, half to Children's Hospital."

And then, what happened was...and by the way, the 7 million was paid out over time. It's installments. It was over, you know...you'll see the documents, but it's over a couple of years, right? So his business manager, Ed White, you'll see the letters, he sends the first 100,000 out of the 7 million to each of them and says, "This is a pledge towards the 3.5 million that Amber's donating, and she'll be paying that in installments." So everybody knows she's paying it in installments. You're going to hear differently from them now, but you're going to see that was the admission at the beginning. You're going to hear from Children's Hospital and the ACLU that they assumed this was a pledge paid over a period of time, because that's what they do because of tax deductions and things of that nature.

So Amber does make...she makes a \$250,000 payment to Children's Hospital, then she also makes a \$250,000 payment to Art of Elysium, which is another charity that she worked for and used to feed and used to do a lot of artwork with the Children's Hospital. She pays \$350,000 to the ACLU. Now, in addition to that, she also was dating Elon Musk by this time. You'll find out that Mr. Depp is obsessed with Elon Musk. But she's dating him, so he gives \$500,000 to both of those charities in her honor. Now, she doesn't claim that's part of the 7 million, but what happens is that she makes her payments up through 2018, Mr. Depp sues her March 1, 2019, in this litigation. She can't afford, right now, to

be making those pledges. She's got to defend herself. But she has every intention of continuing to make those payments.

She has been a lifelong person who has served charities. She used to volunteer at Children's Hospital three times a week when she could. She's very much that kind of a person, and she intends to. And both ACLU and Children's Hospital will tell you they have no reason to believe she won't be good on her pledges. There's nothing that required her to do a certain amount at a certain time, and she will give it to them once she's able to afford it again.

Now, let me talk about the counterclaim for a minute, and then I'm going to...I have to promise to let you go at some point, don't I? So Mr. Depp has decided...you heard from Ben, you're going to see some really, really terrible text messages from Johnny Depp on how he viewed Amber Heard. He calls her some horrific names. But in the summer of 2016, he vows. He vows he's going to haunt her. He vows she's going to suffer global humiliation. He says he's going to live in her, and she will never forget him. And he meant it.

So in the summer of 2018, you heard Ms. Vasquez say that he wants to clear his name, he can't be called a wife-beater, etc. But an article, an op-ed, appeared on the Sun Times in London that called him a wife-beater. It was written by Dan Wootton, the CEO, or yeah, the chief editor of "The Sun" at the time, and he is writing because Johnny Depp is being cast in Fantastic Beasts 3. And so the article is, "Why is JK Rowling genuinely..."

So you will hear testimony...let me back up a little bit. So you have heard from Mr. Depp's team that they are going to claim that Amber Heard abused Johnny Depp. You also are hearing from them that he says that she cut off his finger. When you look at the text messages and you look at the emails, you will see that, in every one of those, Mr. Depp said to Dr. Kipper, to David Heard, Amber's father, and to others, "I cut off my finger." You will see that. He never, throughout the entire time he was married to Amber, ever claimed that she hit him. He never ever, throughout the time he was married to Amber Heard, claimed that she cut off the finger. Only two years later does he, for the very first time, start claiming she abused him and start claiming that she cut off the finger. I'm going to ask you to look hard at the evidence, in this case, because the evidence is going to show that it never ever came up before,

Now, let's talk about the counterclaim for a few minutes. There's a few statements here. Now, they've said, "Why are you suing Adam

Waldman?" You heard from Ben that Adam Waldman didn't come into Johnny Depp's life until October 2016. He wasn't there for any of their marriage. He doesn't have any personal knowledge of their marriage. Everything he does is based on Johnny Depp. Johnny Depp used Adam Waldman as his agent, and you will see a bunch of texts where he's saying, "Yeah, man. He's going after these people. He's doing all this stuff for me. He's suing my business manager. He's suing the lawyer. He's going at...you know, he's doing all this." He's also going to the press and making all kinds of statements about Amber Heard, and those statements are as follows. And, Heather, if you can pull up the first.

The first one is Adam Waldman, Depp's lawyer, said afterwards, "Amber Heard and her friends in the media use fake sexual violence allegations as both a sword and a shield, depending on their needs. They have selected some of her sexual violence hoax 'facts' as the sword, inflicting them on the public and Mr. Depp." Now, there isn't any sexual violence hoax. There isn't any hoax at all. But he's out there affirmatively stating that she's got this conspiracy with her friends, and she's making these things up. And it's very, very damaging and harmful to her. The testimony will be that these Depp fans take and run with these things, and you're going to hear from an expert who talks about, computer-wise, when you search the hoax, and you see that it just spreads out into the internet and to social media and generates a lot of negative publicity for Amber.

Statement two, please. This was made in April of 2020. Depp's lawyer, Adam Waldman, said the various discrepancies prove that nothing Heard and her friends said about the events of May 21, 2016, could be considered credible. "Quite simply, this was an ambush, a hoax. They set Mr. Depp up by calling the cops but the first attempt didn't do the trick," he told dailymail.com. "The officers came to the penthouses, thoroughly searched and interviewed, and left after seeing no damage to face or property. So Amber and her friends spilled a little wine, roughed the place up, and got their stories straight under the direction of a lawyer and publicist, and then placed a second call to 911."

Now, I've already told you all about the events of May 21, but you're also going to hear from the second set of officers, there's no way that Amber was trying, with her friends, to now get charges pressed against Johnny. They cleaned everything up. They didn't want him in there. The absolute opposite of what he says there.

The third statement, if you may. Depp's attorney, Adam Waldman, said, "When Amanda de Cadenet," that's a friend of Amber's, "Amber Heard's

best friend and #MeToo activist recants her support for Ms. Heard and testifies against her, you know we have reached the beginning of the end of Ms. Heard's abuse hoax against Johnny Depp." Amanda de Cadenet never testified against her, but that's not the part that we're claiming is the defamation. It's abuse hoax against Johnny Depp. In other words, in all of these articles, he's saying that she created an abuse hoax, and you're going to make those determinations of whether that's true or not.

But what we're going to show you is that that not only was tremendously damaging to Amber, emotionally, and you're going to hear from an expert on domestic violence and intimate partner violence, IPV, about how those triggers happen when you have somebody who's gone through all of this, and she's trying to heal, and she's trying to get past this, and then, bam, you come in there, and you inflict this and put this out in the public, and everybody runs. There's over a million...we're going to tell you about a million different searches on the Twitter from these different hits, how that impacts her emotionally every time somebody calls her a liar for what she went through and how hard she tried to protect Johnny Depp so that his children and the public never found out about that Johnny Depp and how much that has harmed her and how much emotionally that's impacted her and re-triggered and re-triggered. But we're also going to talk to you about the reputational damages for that.

Amber made it through the divorce. Then, she got cast in "Aquaman." A few of you saw that. That was a blockbuster. It was the highest-grossing movie in DC films history ever, up to this point. It hit over \$1 billion in a very short period of time. It was a mega, mega hit. She was moving forward. Then, she gets hit with these defamatory statements and all of the Depp followings and the computer and Twitter, and everything else. Nobody wants to touch her. And you're going to hear from an expert who's going to say, "Look at Jason Momoa. Look at Gal Gadot. Look at other people who started coming up in those tracks from..." She was in "Justice League" and then "Aquaman." Look what they're getting. They're getting commercials. They're getting all kinds of different film opportunities. These are the things that she would have gotten. Nobody would touch her. She's a pariah. And we're going to ask you, as Ben said, to hold Mr. Depp responsible. Enough is enough. But we're also going to ask you to hold him responsible and try to fully and fairly compensate Amber for what he has done to her. Thank you very much.

Judge Azcarate: Thank you, Ms. Bredehoff. Based on the time, ladies and gentlemen, I think I'm going to release you for lunch a little early so

we can just start with the first witness when we get back from lunch. I think it's just a natural break. So if you want to, go ahead and go with the deputy. Just remember, don't talk to anybody about the case, and don't do any outside research, okay? We'll be back here...let's get back at...I'll give you a little extra time to 1:45, okay? Just to give you some extra time downstairs, okay? All right. Thank you. If you'd go with Deputy Lucy [SP]. All right. Does somebody have the motion in limines for me? I don't think I've received those signed orders.

[inaudible 02:07:58]

Judge Azcarate: Okay, first thing after lunch, I get them?

Mr. Murphy: Yes, Your Honor.

Judge Azcarate: Okay. All right, that's perfect. Anything else? All right, we'll be back at 1:45, then.

All right, are we ready for the jury, or do we have the motion in limines?

[inaudible 02:08:16]

Judge Azcarate: Okay, if I could just get those, I'd appreciate it.

Mr. Murphy: So we do have the order for Ms. Heard's motion in limine, Your Honor.

Judge Azcarate: Okay.

Mr. Murphy: Mr. Depp's Mr. Moniz and I just agreed to it.

Judge Azcarate: Okay.

Mr. Murphy: I don't have it printed, but I can tell you, Your Honor, based on the representation you gave me, it is agreed.

Judge Azcarate: Okay.

Mr. Murphy: And we will have it printed as soon as I can, but we're not going to, obviously, hold the court.

Judge Azcarate: That's fine. Thank you very much.

Mr. Murphy: Thank you, Your Honor.

Judge Azcarate: Thank you, Mr. Murphy. All right, are we ready for the jury, then? Okay.

[02:08:48]

[silence]

[02:10:02]

Thank you, ladies and gentlemen. All right. Your first witness.

Bailiff: Can we call in Christi Dembrowski?

Judge Azcarate: Christine Dembrowski? All right, Christine Dembrowski. Is she outside?

Mr. Chew: She is.

Judge Azcarate: Okay. Christine Dembrowski.

[02:10:18]

[silence]

[02:10:42]

Female: Do you solemnly swear or affirm to testify truthfully in this case under penalty of law?

Judge Azcarate: You have to verbally answer, ma'am.

Christi: Yes.

Judge Azcarate: Okay, thank you.

[02:10:53]

[silence]

[02:11:10]

Thank you.

Christi: Hi.

Judge Azcarate: Yes, sir.

Mr. Chew: Good afternoon, Ms. Dembrowski. Would you please state your full name for the record?

Christi: Elisa Christine Dembrowski.

Mr. Chew: Ms. Dembrowski, what relationship, if any, do you have with Johnny Depp?

Christi: He's my younger brother.

Mr. Chew: How much older are you than Johnny?

Christi: Two and a half years.

Mr. Chew: Ms. Dembrowski, I'd like to ask you a few questions about your and Johnny's childhood. Where did you all grow up?

Christi: We were born in Kentucky, and we moved to Florida when we were kids.

Mr. Chew: Who lived in your household with you and Johnny?

Christi: Our mom, our dad. We have an older brother, an older sister, and Johnny and I.

Mr. Chew: Who was the youngest child in your family?

Christi: Johnny.

Mr. Chew: Would you please tell the jurors what your relationship with Johnny was like when you were growing up?

Christi: Johnny and I were very close. With having the older brother and older sister, we were the two younger ones, so we were really close, and we, basically, were together all the time. We played together. We played Hot Wheels. We, you know, played Batman and Robin, where we each had a role in that. And he's probably going to be embarrassed that I say any of this, but you know, we practiced, you know, karate kicks with each other and chopping. We were just friends. We were like best friends.

Mr. Chew: What was Johnny like as a young boy?

Mr. Rottenborn: Objection, Your Honor, 404.

Judge Azcarate: If you want to approach.

Mr. Chew: As I was saying, Ms. Dembrowski, what was Johnny like as a little boy?

Christi: He was a shy, sweet little boy. He had a very caring personality, but also, he was a little bit of a clown. He loved to, you know, play tricks on us or try to scare us. He was a very typical, happy, little boy.

Mr. Rottenborn: Objection, Your Honor, move to strike, 404.

Mr. Chew: Your Honor, I'm going exactly where I said I was going.

Judge Azcarate: All right, I'll stay in the last part of her answer, and we'll go forward from that.

Mr. Chew: Thank you very much, Your Honor. Ms. Dembrowski, how would you describe your parent's relationship?

Christi: That was complicated.

Mr. Chew: Would you please explain to the jury what you mean when you say your parent's relationship was complicated?

Christi: Our parents were...they had two completely different personalities, where our father was also very kind, patient, loving, gentle man, and our mom was the opposite. She was very high-strung, very nervous, anxiety, angry. So they were completely opposite people.

Mr. Chew: What was your mother's first name?

Christi: Betty.

Mr. Chew: Did your mother, Betty, ever get angry with your father?

Christi: Yes.

Mr. Chew: How would your mother express her anger toward your father?

Christi: Mom would...she would scream. She would yell at him. She would hit him, call him names, that kind of thing.

Mr. Chew: Did your father ever hit your mother back?

Christi: No. Dad never reacted when mom would hit him or scream at him.

Mr. Chew: If he didn't hit her back, how, if at all, did he react?

Christi: Basically, he would let her scream and get it out or hit and be done. And the way that you dealt with my mom...the way that he dealt with my mom was he always tried to keep the peace. So he never wanted to...you know, he didn't want to engage in anything. So he was very, you know, sort of...he would step back. And whatever it was that she was angry about, he would try to go ahead and make sure that he took care of whatever she was insisting that he did.

Mr. Chew: Is it fair to say he did what she wanted?

Christi: Yes, it's very fair to say he did.

Mr. Chew: What, if anything, did you and Johnny do while your mother was hitting or attacking your father?

Christi: We would leave the area. We would run and hide. We would go to our room, you know. Either we'd go to our room together or, you know, depending on where we lived, you know, if our room was close, we would sort of run off and get away from it.

Mr. Chew: How did your mother treat you and your brothers and sisters?

Christi: Well, there's a similarity, I'm sorry, in how she treated dad. Again, she was very anxious, high-strung. She screamed, she yelled, she hit, she threw things, she called us names. You know, we each had our own little special set of names, some we wouldn't repeat, but... So she gave each one of us a name. My name, for example, was Violet, which, to some people, it wouldn't seem like it's anything, but Violet was my father's mother, and my mom hated my father's mother. So that was my special name, one of them.

Mr. Chew: Did your mother have any special names for Johnny?

Christi: Yes, she did. She had a few, again, some, to not repeat. Her favorite, I think, was she called him One Eye, and she called in that because, when he was young, the doctors thought he had a lazy eye, so they would put a patch on his good eye so that they would strengthen the other eye. So she used that as, you know, a way to find a new fun name for him.

Mr. Chew: How did Johnny respond when your mother would call him One Eye? He didn't respond in any negative way. Those names were...they were just a way of life. We got used to them. We accepted all of it.

Mr. Chew: Putting aside the names, did your mother ever get angry with you?

Christi: Yes.

Mr. Chew: Did your mother ever get physical with you?

Christi: Yes, she did, but I was also very quiet, very shy, and I learned early on to stay back. So I was more in the background because I would constantly sort of stay in the background to stay away from trouble.

Mr. Chew: Ms. Dembrowski, when she, your mother, did get physical with you, what forms did that take?

Christi: Well, she would hit us. She would throw things. She would have us go pick a switch, you know, off of a tree, you know, so that that would be what she could hit us with and make sure that we got one that was nice and green.

Mr. Chew: I'm sorry, I don't mean to interrupt. Why did it have to be nice and green?

Christi: Well, if it wasn't a nice green switch, twig, it would snap. Those didn't break. If you got a dry one, they'd snap. They don't work the same.

Mr. Chew: Did your mother ever get angry at Johnny?

Christi: Yes.

Mr. Chew: Did you ever observe your mother hitting Johnny?

Christi: Yes.

Mr. Chew: How, if at all, did Johnny react when his mother would hit him?

Christi: He was a typical little boy where, if it hurt, he would cry. That was it. I mean, for the most part, he just wanted to get away from it.

Mr. Chew: Did Johnny ever hit his mother back?

Christi: No.

Mr. Chew: What about when he got to be an older boy, did he ever resist or hit her back?

Christi: No. No. No. When he was older, even if she hit or threw things, he never went to that place. He always...he would get away. He would, you know, leave the area, go to his room.

Mr. Chew: Ms. Dembrowski, did there come a time when you left the family household?

Christi: Yes.

Mr. Chew: When did you leave the household?

Christi: I left when I was 17. I was pregnant and got married and moved out into my own place.

Mr. Chew: How did it feel when you left the family to go out and go to your own place?

Christi: I think there's a bittersweetness to it. I was really young. I had just turned 17. But I was so looking forward to this new life that I could create that was different from what we had at home. And so there was a part of me that was really happy to be able to do this, really excited, and there was another part that was sad because I left behind my little brother and my dad.

Mr. Chew: If you could explain that a bit, how, if at all, did your experience with your mother affect your ideas about what you intended to do with your own family?

Christi: Really early on, as a young child, none of what was happening in our home felt good. And so, as I got older, you know, both Johnny and I, actually, we decided that, once we left, once we would have our own home, that we were never going to repeat ever anything similar, in any way, to our childhood. We were going to do it different.

Mr. Chew: So Johnny felt the same way?

Christi: Absolutely.

Mr. Chew: When you left the home to start your own family, who among the original four children were left at home with your mother?

Christi: Johnny.

Mr. Chew: Did there come a time when your parents separated?

Christi: Yes.

Mr. Chew: Would you please tell the jury what happened?

Christi: There was...our father, one morning, decided to pack up everything and leave early in the morning. We didn't know it at the time. I don't think. But I didn't. I didn't live there. I was at work. And then I got a call from my mom in the afternoon right after she got off work. She called me, and I could...it was hard to understand her voice. She sounded faint and kind of groggy, but she kept saying, "He's gone. He's gone. He's gone." And I was trying to get out of her, "Was it dad?" And she said, "Yes, your daddy." And I said, "Mom, are you okay? What did you...what's going on, you know? Did you take your pills?" Because she took what she called nerve pills, and she said she had. I asked how many. She couldn't tell me how many she took, but I knew she was getting fainter on the phone. And it was more clear to me that she was not in a good way. So I called our friend, our parent's friend, actually, who was a police officer, and told him that he needed to get to mom and what was going on. And so he got an ambulance to get over there to her.

Mr. Chew: And this was after your father left?

Christi: Yes, this is the day.

Mr. Chew: Ms. Dembrowski, do you know why your father left?

Christi: I know, at the time, because I did try to speak to him after, because mom continued to not do well. At the time, he said that they had had the last argument that he felt that they could ever have. He felt he needed to leave home this time. And to be honest, I didn't really understand. It had been so many years that he had been taking all of the, you know, all of her personality. And I didn't really understand exactly, fully, what that last argument was, why it was so intense. We did learn, many years later, in our adult life, that what he was referring to when he said...

Mr. Rottenborn: Objection, move to strike all of that as hearsay.

Judge Azcarate: I guess the objection is hearsay.

Mr. Chew: Your Honor, again, I think it's not offered for the proof. It's offered for the abuse and the culture in which...

Judge Azcarate: I'll sustain the objection.

Mr. Chew: Thank you, Your Honor. Did your mother recover after she took the pills?

Christi: Yes. She continued to not be well, but she recovered.

Mr. Chew: And after that time, did she ever take more pills than she should have?

Christi: She did, but she didn't do it to the degree that she had at that point.

Mr. Chew: And going back to the incident that you described, do you know where Johnny was at the time your mother took those pills?

Christi: Johnny was home.

Mr. Chew: Did there come a time...oh, excuse me. I'm sorry.

Christi: I'm sorry. I think he was sleeping at the time. I think he woke up when mom came out and the ambulance came.

Mr. Chew: So he saw all of that?

Christi: Yes.

Mr. Rottenborn: Objection, foundation.

Mr. Chew: Did he see that? She testified he was in the home.

Judge Azcarate: He was in the home, but was she in the home? I guess, how did she know? So I'll sustain to foundation.

Mr. Chew: Thank you. Did there come a time when Johnny left his mother's house?

Christi: Yes.

Mr. Chew: And after Johnny...what did Johnny do when he left the house?

Mr. Rottenborn: Objection, foundation.

Judge Azcarate: All right, I'll sustain his foundation. If you want to lay a foundation.

Mr. Chew: Were you in communication with your brother at the time?

Christi: Yes, he came and lived with me for part of the time.

Mr. Chew: So I think that...so, what did your brother do after he left your mother's house?

Christi: He, you know, lived in different places. He lived with me, and he lived with another family.

Mr. Chew: Did you and Johnny continue to communicate with your mother, Betty, after you both left the home?

Christi: Yes. Yes, we did.

Mr. Chew: And after what you have described, why did you and Johnny continue to communicate with your mother?

Mr. Rottenborn: Objection, foundation is to Johnny.

Mr. Chew: I think she's already laid the foundation, they're very close. She was in communication.

Judge Azcarate: I'll sustain the objection, if you want, for this particular question.

Mr. Chew: Why did you continue to communicate with your mother?

Christi: Because she was our mom, and we loved her. I mean, we knew, you know, even when we were younger, that things weren't...they didn't

feel right, you know. But what we understood was that, you know, mom had her own upbringing, you know. So she had her own past, and the way she was raised would affect the way she lived. And so, in our mind, she was doing the best she could do, you know. We sort of treated it like she did the best that she could do with the tools that she was given, you know, from her life in the past. And what we decided to do was we just decided to get new tools. We chose different tools from that.

Mr. Chew: And when you say "we," to whom are you referring?

Christi: I'm referring to Johnny and I.

Mr. Rottenborn: Objection, foundation is to whom.

Judge Azcarate: I'll overrule that objection. Next question.

Mr. Chew: Thank you, Your Honor. Did you ever live with your mother again after you and Johnny had left the house?

Christi: I did. I did live with her briefly. She had gotten diagnosed with asthma when we lived in Florida, and she needed to move to a drier climate. So Johnny moved her to California, to Palm Springs, for the drier weather, and I moved also so that she wouldn't be alone. So I lived with her for a period then.

Mr. Chew: And if you could just please elaborate on what role, if any, Johnny played in your mother's move to Palm Springs.

Christi: He was the only reason the move could happen. He purchased her a home and paid to have everything moved out there.

Mr. Chew: Did there come a time when your mother ever left Palm Springs?

Christi: She moved from Palm Springs to be a bit closer to where Johnny and I lived in the L.A. area. She lived there for a bit, and then, ultimately, she went back to Kentucky. She had...her siblings were still there, and a couple of them weren't doing well. So she wanted to be closer to them while she could.

Mr. Chew: And after she moved back to Kentucky from Palm Springs, did there come a time when your mother became chronically ill?

Christi: Yes.

Mr. Chew: When was that?

Christi: 2011.

Mr. Chew: Would you please describe briefly what her health condition was as of 2011?

Christi: Well, in 2011, she was living in Kentucky, and we received a call that she had been diagnosed with the final stages of Parkinson's. But then, when another doctor looked at her scans, they felt it was something different. So we had the scans brought to a doctor in California, and they suggested that she come out and see a neurologist right away. So Johnny got a plane, a private plane, and he and I, we flew to go pick her up and bring her back to California to start seeing the doctors.

Mr. Chew: And when she moved back in 2011 to California, was that a permanent move?

Christi: It became, basically, a permanent move. She still had her house in Kentucky, in the hopes of, you know, her being able to go back and forth, but her health, basically, kept her in California. So she lived here, or there.

Mr. Chew: And by that time, 2011, when she's moved out to Los Angeles, had her treatment of you and Johnny changed in any way?

Christi: Yes, mom softened as she aged. She totally softened. And once your mother moved to Los Angeles permanently in 2011, what role, if any, did your brother, Johnny, play in her caretaking?

Mr. Rottenborn: Objection, foundation.

Judge Azcarate: All right, I'll sustain as a foundation.

Mr. Chew: To what extent, if any, did your brother play any role in her caretaking?

Judge Azcarate: I think that's still a foundation objection.

Mr. Chew: Do you have knowledge of whether your brother had any role in her caretaking?

Christi: Yes.

Mr. Chew: Would you please explain to the jury? Because I think Her Honor needs to hear whether there's a foundation.

Christi: Okay. I'm sorry. Yes, when we brought mom out, you know, over time, she had multiple other illnesses that came up. And Johnny was...he dealt directly with the doctors, like we did, hired private nurses so that we could make sure that, you know, mom was taken care of, you

know. Basically, Johnny was...he took all financial responsibility for anything and everything mom could need or want during this time, all medical care, doctors, hospitals, nurses.

Mr. Chew: How do you know that?

Christi: I was directly involved.

Mr. Chew: Is it fair to say you saw Johnny do those things and have those interactions?

Christi: Yes. Yes, I was there. I was directly involved in all of that.

Mr. Chew: Did you witness your brother having any interactions with the doctors relating to your mother's care?

Christi: Yes.

Mr. Chew: How often, if at all, did your brother visit your mother, Betty, after she came to live in Los Angeles in 2011?

Mr. Rottenborn: Objection, foundation.

Mr. Chew: Were you ever present with your brother and your mother when you all were visiting?

Christi: Yes. Mom lived in a house that was, basically, across the street from Johnny. It was a house that he has on his street. And I was there, you know, quite a bit. Johnny was pretty much down there every day, a couple of times a day. You know, mom, like, she would see them all the time, you know. One of her favorite things was watching Johnny take the kids to school and waving at them, because she never got to do that before, so.

Mr. Chew: Who were your brother's kids?

Christi: Oh, Lily-Rose and Jack.

Mr. Chew: We'll get to that in a little bit. Did there come a time when the family was considering putting your mother in a hospice?

Christi: There were conversations with the doctors that we should start to consider that since we weren't 100% sure with the variety of conditions that she had what we needed to do. The idea of hospice was something that felt like, since we didn't know a time frame, the idea of introducing new nurses or something at a certain point in someone's life, where they recognize there's a difference, and that could be frightening for them. So we didn't want to instill any fear. You know, Johnny's big on

mom not having fear. So instead, that's when we hired nurses so that the nurses could be there 24/7, you know. And she would have people continuously throughout her life that she knew, that they were friendly, and you know, cared for.

Mr. Chew: Did you actually have a conversation with your brother about the possibility of your mother going into hospice?

Christi: Yes.

Mr. Chew: Did he express an opinion about it?

Christi: Yes. Well, this is where it all comes from, because the idea...again, the idea of hospice, which is an amazing thing, but for someone who...when you don't know, with the variety of illnesses, you don't know what the timing is, the idea of introducing it, new people, is something that becomes almost a signal, you know. And this was a very big discussion. This is why the nurses were hired.

Mr. Chew: Was this just one discussion, or was it a series of discussions?

Mr. Rottenborn: Objection, calls for hearsay.

Mr. Chew: I'm not asking for hearsay, I'm just asking about whether it was discussed once or a number of times.

Judge Azcarate: I'll overrule the objection. Go ahead.

Mr. Chew: Was this just one discussion, or were there more discussions among you and your brother about how to care, how to best care for your mother?

Christi: We had continuous discussions. As a matter of fact, I mean, there were daily updates. He knew every day everything that was happening with mom, whether he was in town, out of town, because he was working or traveling. He had...I made sure, because it's hard when you know that someone wants to be there, and they can't. So I made sure to fill him in on everything.

Mr. Rottenborn: Objection, hearsay.

Mr. Chew: It's not offered for the truth of it.

Judge Azcarate: I'll overrule the objection. Go ahead.

Mr. Chew: Did you ever see Johnny's children, Jack and Lily-Rose, over at your mother's house across the street from Mr. Depp?

Christi: Yes.

Mr. Chew: Ms. Dembrowski, I'd like to change subjects right now, if that's all right, and ask you to please tell us a little bit about your work life. Did there come a time when you worked in the entertainment industry?

Christi: Yes. I started working when we moved from Florida to Palm Springs. This is why I lived for a short period with my mom. I ended up...I got a job at one of the studios in Los Angeles.

Mr. Chew: Which studio was that?

Christi: It was Columbia Pictures. I was...my title was I was an executive assistant to the executive vice president of comedy development.

Mr. Chew: And what were your job responsibilities when you started there?

Christi: I handled my executive's daily schedule, meetings, budgets, scripts, phone calls, and then, in addition to that, we had...there were four other executives, and they had assistants. So my desk was also to oversee those assistants. And when we had writers come in, I oversaw those assistants as well.

Mr. Chew: It sounds like a big job.

Christi: It was a good job.

Mr. Chew: How long did you work at Columbia Pictures Television in that role?

Christi: I think it was about a year and a half.

Mr. Chew: Why did you leave after a year and a half?

Christi: Columbia itself started folding different departments, and ours, our comedy development being one of them. And so some of the employees that worked there went to work for Sony or TriStar, other sort of arms of the corporation. And I was the last one there, sort of wrapping up the department to go on to my next job.

Mr. Chew: So after you wrapped up the transition, the closing up of the department, what did you do in terms of your work life?

Christi: I went to work with my brother.

Mr. Chew: In what capacity? When you say your brother, to whom are you referring?

Christi: I'm sorry. I'm sorry?

Mr. Chew: I'm sorry. When you say your brother, to whom are you specifically referring?

Christi: I went to work with my brother, Johnny.

Mr. Chew: What type of things did you do for your brother, Johnny?

Christi: Similar things to what I was doing with the other boss that I worked for before, but with Johnny, he was...I was helping him anyway as a sister, bits and pieces, before I started working with him. So there were things like travel and meetings, setting meetings, making sure he had his scripts that were coming in, and he knew all the information about them, and any kind of publicity stuff that he had to do. Because I really started to do this job with him because there was one time that I had gone to his house, and I was helping him get ready to go on a trip, and his ticket, I read it out loud, and it said standby, and I said, "Why are you on standby?" He had no one looking out for that kind of stuff, you know, so I did all of that.

Mr. Chew: How, if at all, did your work for your brother change over time?

Christi: Well, over time, it sort of grew. Well, not sort of, it did grow. His agent...I worked sort of hand-in-hand with his agent, and you know, as she got to know me more and I got to know her more, there were other parts of her job, actually, that she would give to me. So instead of just doing scheduling meetings and calendars and travel, now I become a person who's talking to producers or, as it expands, all the executives at the studios and studio heads and become a part of contract negotiation, etc. It just grew.

Mr. Chew: What role, if any, did you play in dealing with Johnny's movie contracts?

Christi: Movie contracts, because I know the history and because there's a certain amount of parts of life that are important, you know, to a human being, not just to an actor but to a human being, and I know the human being, I was part of mostly negotiating parts. Like, there's an area called perks, and perks means anything and everything that an actor would need in order to perform his duties and in order, you know, to also move, right, to the location to do the duty. So I was part of all important dates that, you know, needed to be considered in a calendar, making sure the house was what he needed to have for the family, the travel to get there,

making sure he had his staff, drivers, security. Pretty much anything necessary was in that.

Mr. Chew: Ms. Dembrowski, can you give the jury some examples of some of the things you put on the perks list?

Christi: Sure. It was really important, as Johnny had a family, it was really important to be able to make sure that we were given the opportunity to find the right accommodations and accommodations for the children, a house that could give them a home away from home, with a garden, all the travel to make sure that they all get there. There were really important dates that we carved out in every contract for Johnny's kids, for their birthday. He never wanted to miss their birthdays. So if he wasn't able to be with them because of filming, it was built into the contract that he had their birthday off, and he would have the day before and the day after so that he'd be able to travel to get to them and then get back to working. So in addition to that, I mean, there's quite a bit. We also had it built in that if he was to be away from his kids filming, if the kids couldn't travel and family couldn't travel to be there, we had in his contract that he would be able to fly back to them from wherever he is every two weeks. So he didn't go beyond every two weeks not seeing his children, you know. It's that kind of stuff that, you know, was important.

Mr. Chew: Ms. Dembrowski, do you know what a personal manager is in the context of the entertainment world?

Christi: I do.

Mr. Chew: What is it, if you could explain it to the jury? Because I just learned it myself.

Christi: Well, I believe it's basically a lot of what I was doing. They work with their client on maintaining different items in their personal life, as well as, you know, projects coming in, production, all of the representatives. It's sort of a big scope of duties.

Mr. Chew: Has anyone ever referred to you as Johnny's personal manager?

Christi: I have been called that before, yes.

Mr. Chew: Do you perform the responsibilities of being Johnny's personal manager?

Christi: I did. I did.

Mr. Chew: Do you still work with Johnny?

Christi: Yes.

Mr. Chew: Do you also work with any of Johnny's companies? Or strike that. Does your brother have any companies associated with him?

Christi: He has a production company called Infinitum Nihil.

Mr. Chew: What type of company is Infinitum Nihil?

Christi: It's a production company. We develop, you know, projects for films or television, or you know, different things.

Mr. Chew: And putting aside your responsibilities as your brother's personal manager, what role, if any, do you play in Infinitum Nihil?

Christi: I'm president of Infinitum Nihil.

Mr. Chew: When did you start working at an Infinitum Nihil?

Christi: From the beginning, in 2004. I think we started in July 2004.

Mr. Chew: And would you please explain to the jury some of your responsibilities as president of Infinitum Nihil?

Christi: My duties as president were to...I oversaw everything within the company, the staff, where we were developing projects, where, you know, maybe there's a book that people want to develop into a film or a TV show or different ideas. So I oversaw that, oversaw all of the development, their schedules of meetings with different people to take those projects out to pitch. There's so many tasks in that job, I don't know how to really lay them out.

Mr. Chew: Ms. Dembrowski, when did the first "Pirates of the Caribbean" movie come out?

Christi: I think it was 2003, I think.

Mr. Chew: What was your brother's role in Pirates?

Christi: He was Captain Jack Sparrow.

Mr. Chew: Fair to say that was the lead?

Christi: That was the lead.

Mr. Chew: How did the first "Pirates of the Caribbean" movie fair at the box office?

Christi: It did very well. I think it surprised people and did very well. People really...they loved, you know, the...they love the entertainment of it, you know, the total ride.

Mr. Chew: Did the success of Pirates 1 change Johnny's career in any way?

Christi: I would have to say yes. The success of Pirates 1, it became...Johnny, with that role, and other studios and everybody seeing the success of that film and how the audiences reacted to that character, there was a whole lot more people wanting to be in business with him.

Mr. Chew: And did the success of Pirates 1 change his personal life in any way, or his day-to-day life?

Christi: It did. It did. Because where, prior to that, you know, he was able to go out somewhat, you know. He could, you know, go to different stores, go to bookstores, go to restaurants. When Pirates 1 came out, after that, he was much more recognizable now, you know. So many people loved that character, and so he was much more recognizable. So it became harder for him to go out in public without having a lot of people come around that, you know, rightfully so, wanted to meet him. But then, it also became really big, and so we had even people that were chasing in cars. So we had, at that point, we had to get security team to kind of come in and help us manage how this all works, you know.

Mr. Chew: Who is Jerry Judge?

Christi: Jerry Judge was...he was basically Johnny's head security.

Mr. Chew: When did Jerry Judge start coming to work with your brother?

Christi: Well, we started working with Jerry Judge back in the '90s, because Jerry had his own security company in London. And when we would go over there for press or premieres, or whatever, Jerry was the one, you know, that set everything up. And we became really close with him back then. And as things grew with Pirates, we brought him over more and more, you know, for some of the items that we had, some of the work that he had, if it was a show or whatever, and brought him on. And then he started just working, basically, on every film with us after Pirates, probably, right around that time.

Mr. Chew: How long did Jerry Judge work with you and Johnny?

Christi: Well, again, we met him in the '90s, so, and around...Pirates is what, 2003? And Jerry was with us up until we lost him.

Mr. Chew: When did you lose him?

Christi: We lost him a couple of years ago to cancer.

Mr. Chew: What was Jerry's relationship like with Johnny?

Mr. Rottenborn: Objection, foundation.

Judge Azcarate: All right.

Mr. Chew: Did you ever see Jerry Judge interact with your brother?

Judge Azcarate: Sustain the objection. That's the leading. The next question, that's fine.

Mr. Chew: Thank you, Your Honor. What, if any, observations did...were there any times when you saw your brother interact with Jerry Judge?

Christi: I saw the two of them interact quite a lot, and they loved each other. They were like, you know...Jerry thought of him as his, like, son and sometimes as a brother. They really did love each other and so much respect both ways.

Mr. Rottenborn: Move to strike all of that.

Mr. Chew: I don't think there's any basis to strike that. I think it was most responsive.

Judge Azcarate: I'll overrule the objection, go ahead.

Mr. Chew: Thank you, Your Honor. And I wanted to touch on something you mentioned a few moments ago when you were referring to Mr. Depp's children. I believe you said it was daughter, Lily-Rose, and son, Jack. Who was the mother of Johnny's children?

Christi: Vanessa Paradis.

Mr. Chew: Did Johnny and Vanessa Paradis ever live together as a couple?

Christi: Yes.

Mr. Chew: How long did Johnny and Vanessa Paradis live together as a couple?

Christi: I think they were together 14 years, I think.

Mr. Chew: And did their children live with them during the 14 years?

Christi: Yes.

Mr. Chew: How much time would you say you spent with Johnny, Vanessa, Lily-Rose, and Jack?

Christi: When they were in Los Angeles, I would say I saw them all daily. Our office, where we work, our office is only...it was only 10 minutes from their house. So I would make trips back and forth, or every day, after work, I would go straight to the house. So I saw them daily.

Mr. Chew: Would you please explain to the jury what it was like spending time with Johnny and his family?

Christi: It was great. It was great. It was a normal, happy family, you know. You go there, and the kids are playing, and you know, making dinner, everybody having dinner, cleaning up together, sitting around, laughing. It was great.

Mr. Chew: Did you have occasion to see your brother interact with his children?

Christi: Yes. Yes, I did.

Mr. Chew: What did you observe? What can you tell the jury about what you observed?

Christi: I'm proud to say, he's one of the most devoted fathers, I think, that I've ever seen. Like, everything in life was about the children. But when he was with the kids, like, the attention that he would give them, you know, it was just constant, playing with them, listening to them, you know, laughing with them, reading to them, Arby's, I mean, you name it, and he was there.

Mr. Chew: Did you ever observe Johnny treating his children the way you saw his mother treat him when he was young?

Christi: No. No.

Mr. Chew: Have you ever seen Johnny hit either of his children?

Christi: No.

Mr. Chew: Have you ever heard your brother raise his voice at his children?

Christi: No.

Mr. Chew: You may have touched on it earlier, and if so, I apologize. How, if at all, did Johnny communicate with his children when he was shooting a film?

Mr. Rottenborn: Objection, foundation.

Mr. Chew: Were you...?

Judge Azcarate: All right, I'll sustain the objection if you want to lay the foundation.

Mr. Chew: Understood. Did you have occasion to observe...were you ever with your brother when he was shooting a film?

Christi: Yes.

Mr. Chew: Did you have occasion to observe your brother communicating with his children while you both were there on set?

Christi: Yes. Yes.

Mr. Chew: No, please, go ahead.

Christi: Excuse me. When Johnny was filming, most of the time, the family was with him. The family would travel and go. You know, just like I said earlier, we would get a house and garden, and all of that, to make sure that there was a home. So his family was with him most of the time.

Mr. Chew: What about when the children got older and they started going to school, did that change in any way?

Christi: It changed in that, you know, they didn't want to disrupt the children's lives when they were going to school. So if dad had to go off and go work, and the children stayed home, this is where we get into...we still maintained a home for the family wherever he was filming, you know, because they have the opportunity to come back and forth. But at the same time, Johnny would...he would travel back every two weeks, you know, to see his kids.

Mr. Chew: And when you say he would travel back, who was it who made those travel arrangements?

Christi: I made the travel arrangements.

Mr. Chew: Did you have occasion to observe Johnny interact with the mother of his children, Vanessa Paradis, over the 14 years they were together?

Christi: Yes, I did.

Mr. Chew: Would you please tell the jury what you observed about the interactions between Mr. Depp and Vanessa?

Mr. Rottenborn: 404, Your Honor.

Mr. Chew: This is not...this is directly...

Judge Azcarate: I'll allow observations. [inaudible 02:58:19].

Mr. Chew: Thank you very much, Your Honor. What did you observe about Mr. Depp's interactions with the mother of his children?

Christi: They were a great couple. I mean, first, you could see that they were friends. They just...they were happy together. You know, they got along great. It was a happy, normal...

Mr. Rottenborn: Move to strike, Your Honor.

Judge Azcarate: I'll sustain the objection at this point, then.

Mr. Rottenborn: Thank you.

Judge Azcarate: All right.

Mr. Chew: Did you ever hear your brother yell at Vanessa?

Christi: No.

Mr. Rottenborn: Objection.

Mr. Chew: It's not leading.

Mr. Rottenborn: 404.

Mr. Chew: To what extent, if any, have...

Judge Azcarate: That wasn't the question, Mr. Chew.

Mr. Rottenborn: 404 is the main objection, Your Honor.

Judge Azcarate: Okay. I'll sustain on that objection. Next question.

Mr. Chew: What, if any, violence did you observe between...

Judge Azcarate: Go ahead, finish your question first.

Mr. Chew: Well, if I think you're going to sustain the objection, perhaps, I should...

Judge Azcarate: Maybe we should move on, yes. Okay.

Mr. Chew: Okay. All right. Did Vanessa ever claim that Johnny ever physically abused her?

Christi: No.

Mr. Rottenborn: Objection, foundation, calls for hearsay.

Judge Azcarate: All right, hearsay objection.

Mr. Rottenborn: And 404.

Mr. Chew: It's not offered for the proof of the...it's what she observed, what she heard. She was the personal manager, Your Honor.

Judge Azcarate: That would be hearsay, I'll sustain the objection. Thank you.

Mr. Chew: Did there come a time when Johnny and Vanessa separated after 14 years?

Christi: Yes.

Mr. Chew: How would you describe their relationship today?

Mr. Rottenborn: Same objection, 404.

Judge Azcarate: All right.

Mr. Rottenborn: And calls for hearsay, as well, and foundation.

Mr. Chew: I don't think it calls for hearsay, Your Honor. She's his sister.

Judge Azcarate: I understand, but it's a character evidence issue, so I'll sustain the objection.

Mr. Chew: Who is Amber Heard?

Christi: My brother's ex-wife.

Mr. Chew: When did you first meet Amber Heard?

Christi: I first met her when she came to the office for casting on Rum Diary, probably late 2008, I think, somewhere in there.

Mr. Chew: Did you see Ms. Heard on set?

Christi: Yes.

Mr. Chew: What, if anything, did you observe?

Christi: When she was working on set, I mostly observed, you know, some of the...you know, I was there for some of the scenes and in between, you know. She was a bit sort of, like, standoffish, had all people coming around her, but I don't really have that much time with her on set.

Mr. Chew: When was Rum Diary actually released?

Christi: 2011.

Mr. Chew: Was Johnny in that movie?

Christi: Yes.

Mr. Chew: What role, if any, did you have with respect to Rum Diary?

Christi: I was one of the producers.

Mr. Chew: And after seeing Ms. Heard on the set in 2009, 2010, when was the next time you saw Ms. Heard?

Christi: I think the next time I saw her was we were promoting Rum Diary towards the end of 2011, I think. I was not able to go on the full promotional tour where we do screenings for people around the country, because my mom was sick, but I was able to attend the one in Los Angeles. So I saw her at that event.

Mr. Chew: What did you observe? So you attended the premiere?

Christi: I attended the premiere and the dinner afterward, yes.

Mr. Chew: Would you please describe for us what you observed at the premiere?

Christi: At the dinner.

Mr. Chew: At the dinner.

Christi: Because I sat outside at the premiere. I didn't actually watch the movie. I'd already seen it. I sat at the same table with some of the other people involved and the cast. So I saw Johnny and Amber. You know, they were seated together. I saw them talking quite a bit, and she seemed very friendly that night, yes.

Mr. Chew: Did there come a time when you learned that Johnny and Amber were romantically involved?

Christi: Yes.

Mr. Chew: When was that?

Christi: I don't recall exactly. I know it was some time after the Rum Diary premiere.

Mr. Chew: To what extent did you have occasion to observe Johnny and Ms. Heard together early in their relationship?

Christi: I would see them...there were times when she would come and, you know, visit our mom, you know. I would see her then. I would see the two of them then. I didn't really spend a tremendous amount of time with her.

Mr. Chew: Had you formed any impression of Ms. Heard at that time based on your observations?

Christi: I did. I did. Look, I didn't know her very well, and I would spend time...like I said, she would, you know, she would come to my mom's house. I sat with her and my mom.

Mr. Rottenborn: Objection, 404, what was her impression of Amber.

Mr. Chew: Based on her observation. She's describing what she observed, Your Honor.

Mr. Rottenborn: It doesn't matter. It's 404.

Mr. Chew: I don't think that's right, Your Honor. I think she's describing what she observed.

Judge Azcarate: Right. You want to approach for a moment.

Mr. Chew: Did there come a time when your brother and Ms. Heard started to live together?

Christi: Yes.

Mr. Chew: And when did that occur, approximately, if you recall?

Christi: I don't recall the timing. I don't recall the time frame. I believe they had moved downtown to the Eastern Columbia Building, but I don't remember exactly when that was.

Mr. Chew: What type of structure was the Eastern Columbia Building? Was that a freestanding house, or was it apartments?

Christi: It's apartments, and he had the penthouses on the top floor.

Mr. Chew: How many penthouses did your brother own on the top floor of the Eastern Columbia Building?

Christi: I think it was five apartments.

Mr. Chew: Do you know who lived in those five apartments when your brother and Ms. Heard went to live there?

Christi: I know who lived down there. I know Isaac, a friend of Johnny's named Isaac, lived down there. I know Amber's friend, Rocky, and her boyfriend lived in one of the penthouses. Amber's sister, Whitney, lived in one of the penthouses.

Mr. Chew: When you say Rocky, are you referring to Rocky Pennington?

Christi: Yes.

Mr. Chew: And was her boyfriend Josh Drew?

Christi: Josh Drew.

Mr. Chew: Did Rocky Pennington and Josh Drew pay any rent to your brother?

Christi: No.

Mr. Chew: What about Ms. Heard's sister, Whitney, did she pay any rent to your brother?

Christi: No.

Mr. Chew: Do you know why your brother allowed them to live rent free at the ECB?

Christi: Because they were...

Mr. Rottenborn: Objection, foundation.

Judge Azcarate: Hold on. I'm sorry, ma'am.

Christi: I'm sorry.

Judge Azcarate: Foundation, we asked, "Do you know why?" So if she knows, she can answer. I'll allow it. I'll overrule.

Mr. Chew: She was his personal manager.

Judge Azcarate: That's fine. Go ahead.

Mr. Chew: Did you arrange for handling a lot of your brother's bills?

Christi: I would give them to the business manager, but I believe they were Amber's family and friends, that's why he let them live there.

Mr. Chew: How often did you see your brother when he was living with Ms. Heard at the ECB penthouses?

Christi: We didn't see him as often. I didn't see him as often. He pretty much stayed down there. He didn't come back, you know, towards where we were in West Hollywood very often unless he had a reason to.

Mr. Chew: And on those occasions when you did see your brother, what observations did you make?

Christi: He was always in a hurry when he was able to come back. You know, he could never sit and spend the time, you know. It felt like he was always trying to, you know, get back downtown. He just seemed so much sadder. He did not seem himself. He was always...his person was much just sadder.

Mr. Chew: In that time period, when your brother and Ms. Heard were living at the ECB, did you have occasion to observe them together?

Christi: On occasion.

Mr. Chew: Would you please describe for the jury what you observed on those occasions when you saw your brother and Ms. Heard together?

Christi: I mean, there's different occasions of...I've seen them together when they come into the office. I mean...

Mr. Chew: When you saw them together, did they appear to get along?

Mr. Rottenborn: Objection, Your Honor, very leading.

Judge Azcarate: All right, I'll sustain this to leading. All right, next question.

Mr. Chew: Did you ever witness them arguing?

Mr. Rottenborn: Objection, leading.

Judge Azcarate: All right, I'll sustain this, sustain this to leading.

Mr. Chew: In your capacity as Johnny's personal manager, do you know whether your brother and Amber ever travel together?

Christi: Yes, they did travel together. I mean, there were times, you know, when Johnny had to go do press or film, they travel together.

Mr. Chew: What type of travel arrangements did you make for the two of them when they traveled together?

Christi: We would get a private plane that took them to whatever the destination was and make sure that we had, you know, the hotel accommodations taken care of. Part of what we did was to always make

sure that we anticipated, you know, everything. So we would do the travel, the hotels, cars, drivers. I would make sure that there was an extra hotel room, you know, for trips when they would go...

Mr. Chew: Why did you make sure there was an extra hotel room when Johnny and Ms. Heard went on trips together?

Christi: Because their...

Mr. Rottenborn: Objection, the extent of the answer calls for hearsay.

Judge Azcarate: All right.

Mr. Chew: I don't believe it does, Your Honor.

Judge Azcarate: Okay, that's fine. You can answer, ma'am.

Christi: Oh, thank you. I booked the extra hotel rooms because, if Johnny was at home or, you know, anywhere like that, he was able to...if they argued, he was able to leave the room, leave the argument, and go, like he's always done, and hide in a different room to get away from it. When they were traveling for, you know, the different reasons, for press, or whatever, and we'd book the hotel rooms, I wanted to make sure that there was an extra room, you know, because it wasn't unusual, I mean, for them to have an argument. So I wanted to make sure that there was an extra room.

Mr. Chew: Did your brother ever have occasion to use that extra room that you booked for him?

Christi: Yes.

Mr. Rottenborn: Objection, foundation. This calls for hearsay.

Judge Azcarate: All right, I'll sustain this foundation, if you want to lay a foundation.

Mr. Chew: I think the foundation was she made all of the travel...well, I can actually lay it through some other questions as well. She was a personal manager. Whose idea was it to book an extra room for your brother when he traveled?

Christi: It was my idea.

Mr. Chew: And why did you do that?

Christi: It was my idea because, you know, I saw a repeat happening in life. When we were and arguments and fighting would start to happen, our first thing was to go and hide and, you know, get away from it. And

since I recognized what felt to be a pattern, that was a repeat pattern from his childhood, I wanted to make sure that there was a place that he could do just that.

Judge Azcarate: Mr. Chew, the question was, "Did Mr. Depp ever use the extra room?" and the objection was foundation. So if you want to lay a foundation of how she would have known that he used that extra room and it's not based on hearsay, that's the issue.

Mr. Rottenborn: And I move to strike that [inaudible 03:14:51].

Judge Azcarate: All right, I'll strike that. Okay, go ahead.

Mr. Chew: Thank you, Your Honor. Did you ever book an extra...did you book your brother's hotel accommodations during the 14 years when he was with Vanessa Paradis?

Christi: Yes.

Mr. Chew: Did you ever book an extra room when he was with her?

Mr. Rottenborn: Objection, leading.

Christi: No.

Judge Azcarate: Overrule. I'll allow that one. Go ahead.

Mr. Chew: If you could repeat it, I don't think the jury heard that.

Christi: I'm sorry. No, I did not.

Mr. Chew: Did you ever hear your brother and Ms. Heard argue?

Christi: No.

Mr. Rottenborn: Objection, calls for hearsay. Also, leading.

Judge Azcarate: I'll overrule that. Go ahead.

Mr. Chew: So you may answer that.

Christi: No.

Mr. Chew: Did you ever see or hear any physical altercation between your brother and Ms. Heard?

Christi: No.

Mr. Chew: What can you tell us about what you did observe of your brother and Ms. Heard together?

Christi: To me, when I saw them, to me, he was always trying to make sure...he was always trying to make her happy. He always made effort to sort of make her happy. I think she had a very...she has a very strong personality, and my brother's personality came off much more soft, at that point, to me.

Mr. Chew: Did you observe any occasions in which Ms. Heard was nice to your brother?

Christi: Yes, I've seen her be nice to him.

Mr. Chew: Would you please explain that?

Christi: I've seen her be nice and offering to bring him a drink or get him whatever. I mean, just typical, like, a typical nice, I've seen that.

Mr. Chew: Have you witnessed any occasions on which Ms. Heard wasn't nice to your brother?

Christi: I have, actually.

Mr. Chew: Would you please describe those to the jury?

Christi: Yeah. On one occasion, because this one really staked with me, on one occasion, I was at the office, and I had a meeting with Dior, who had wanted to sit with Johnny and talk about, you know, working together, and Amber had come in and asked if she was interrupting us, and we said no. We weren't supposed to really talk about the meeting with anyone, but Johnny told Amber that I had just had a meeting with Dior and that, you know, they were interested in him. Her reaction to that was she was in disbelief and sort of disgust, because she said, "Dior, why would Dior want to do business with you? They're about class, and they're about style. And you don't have style," you know. So it was the insulting kind of taking away that one moment, you know. That insult is there. You know, I've seen the insults, multiple times, actually.

Mr. Chew: What, if anything, did you hear Ms. Heard say about Mr. Depp's physical appearance?

Christi: She called him an old, fat man.

Mr. Chew: How did he respond?

Christi: I believe he's heard her call him that himself.

Mr. Chew: Now, Ms. Dembrowski, I'd like to ask you about a specific event that is relevant to this case, and just for the background, I'll say,

did there come a time in 2013 when your brother was working with Keith Richards of the Rolling Stones on a documentary?

Christi: Yes.

Mr. Chew: Were you present?

Christi: Yes, I was present at the...

Mr. Chew: Was Ms. Heard there as well?

Christi: Yes.

Mr. Chew: If you could please tell the jury how physically close you were or how far you were from Ms. Heard while the three of you were on the set.

Christi: I was right next to her. They had gotten there, and I was close enough that I hugged her and was standing next to her. It was a small set.

Mr. Chew: And when you were standing next to her and when you were hugging her, what, if any, marks or physical injuries did you see?

Christi: I didn't see anything.

Mr. Chew: Did you observe your brother's interactions with Ms. Heard while the three of you were on the set?

Christi: Yes.

Mr. Chew: What, if anything, did you observe her doing?

Christi: They were fine. She was laughing and happy, and holding his hand, and you know, leaning on him, hugging him.

Mr. Chew: Did your brother hug him back or hug her back?

Christi: Yes, but it was mostly her hugging.

Mr. Chew: And switching subjects from that time on the set, did there come a time when you learned that Johnny was going to marry Ms. Heard?

Christi: Yes.

Mr. Chew: And this is a little complicated so I'm just going to ask you in a narrative form. I understand there was a wedding and that there were a couple of ceremonies. If you could just please describe that to the jury.

Christi: There was a wedding celebration that was put together on the island. So they had, like, a wedding ceremony on the island. But prior to going to the island to do that, they actually got married in Los Angeles, because they had to get married in Los Angeles because they couldn't get married, you know, paperwork, etc., on the island. So they got married in L.A.

Mr. Chew: How did you learn that they were going to get married?

Christi: We were already working on the celebration part, and I knew that the date was...at some point, they were going to pick a date to try to get married in Los Angeles, but I didn't know the actual date that had been decided until he called me, which was pretty much right before the date.

Mr. Chew: What was your reaction upon hearing from your brother that he was going to marry Ms. Heard?

Christi: I was scared. I was devastated, actually, that it was going to happen as quickly as it was being pushed for. I actually tried to talk him into just waiting a little bit longer, just a little bit, and not rushing.

Mr. Chew: Why did you want him to wait a little bit longer?

Christi: There had been conversations about a prenuptial agreement that had been going on for a while. And as the date was approaching, you know, for the island ceremony, there was no success in the prenuptial conversations. And I knew it was important. His representatives had explained the importance, and I knew it was important to him for his children. And we were rushing to do something without his children being protected.

Mr. Chew: Specifically, if you could explain to the jury what involvement you had in those discussions about a prenuptial agreement.

Mr. Rottenborn: Objection, there's foundations to discussion with them.

Mr. Chew: She's testified about her...

Judge Azcarate: I'll allow it, go ahead.

Mr. Chew: Thank you, Your Honor. What was your involvement in the discussions involving a prenuptial agreement?

Christi: Mostly, it was...I spoke with the attorneys and the representatives so that they explained the importance of it and they explained the reasons behind it.

Mr. Rottenborn: Move to strike, hearsay.

Judge Azcarate: I'll allow it that.

Mr. Chew: That means you can keep going.

Christi: Okay. So, I'm sorry. I'm sorry. So that we could have further conversation with Johnny, and there was an attorney that they coordinated with for Amber. So that was where I was involved, in coordinating that part.

Mr. Chew: Which side wanted a prenup?

Christi: Johnny's side wanted a prenup.

Mr. Chew: And I believe what you said may have gotten lost. Why did Johnny's side want a prenup?

Christi: Well, the prenup was to make sure that his children were protected.

Mr. Chew: That's Jack and Lily-Rose?

Christi: Jack and Lily-Rose, yes.

Mr. Chew: Did your brother and Ms. Heard ever sign a prenup?

Christi: No.

Mr. Chew: Why not?

Christi: Amber didn't sign it.

Mr. Chew: Did you end up, despite your misgivings, did you end up attending the wedding between or the ceremony between your brother and Ms. Heard on the island in the Bahamas?

Christi: Yes, I did, but I also attended the actual wedding in Los Angeles.

Mr. Chew: And that preceded the celebration in the Bahamas, is that correct?

Christi: Yes. Yes.

Mr. Chew: Did you have occasion to speak with Ms. Heard either at the ceremony, the formal ceremony in Los Angeles, or the celebration in the Bahamas?

Christi: I did. At the actual ceremony in Los Angeles, they had the ceremony at our mom's house, and at that ceremony, I didn't have

occasion to really speak with Amber. She, Rocky, and Whitney, I don't believe, wanted necessarily to speak with me on that day. I did...after the ceremony was done, I was standing not far from them, and they were having a conversation. They were having a conversation, actually, excuse me, about, should they leak the information that they had already gotten married at the house to the press so that they could...maybe they didn't have to worry about the island when they did the celebration. And Amber actually reached out to me and said, because I was standing seven, eight feet away from her, asked my opinion, you know, what I thought about that, which I basically said I didn't know why they would do it since all the information for the island was already out, and then it wasn't going to help them. I didn't know why they wouldn't want to leak it at all, but it was up to them.

I saw her on the island as well, but on the island, she was actually extremely friendly when I got there. Because, if I'm honest, I debated going. I didn't really want to. I almost didn't. But I took my dad. Dad wanted to go, and I wanted to make sure that I showed up anyway, because I wanted to make sure that, honestly, that my little brother would know that I was going to be...I was always going to be around no matter what. But Amber was extremely friendly and thanked me for coming to her special day, you know. It was a very big day for her.

Mr. Chew: Can you remember any other interactions you had with Ms. Heard or your brother on the island of the celebration?

Christi: Interactions on the island? Not really.

Mr. Chew: And when was the next time you saw Amber Heard after the celebration on the island?

Christi: It would have been when she came back from Australia.

Mr. Chew: And I will get to that, Your Honor. Is it possible for us to take a very quick break?

Judge Azcarate: Sure. Are you going to...you still have quite a bit of direct left, I assume?

Mr. Chew: I do have a fair amount, Your Honor.

Judge Azcarate: Okay. All right. Ladies and gentlemen, why don't we go ahead and have you take your afternoon break of 15 minutes, okay? Again, don't do any outside research and not talk to anybody about the case. I know you're going to hear me say it so much. Thank you.

Mr. Chew: Thank you, Your Honor.

Judge Azcarate: All right. I haven't said yet. So let's see. I want to make sure...I haven't said yet. No, that's okay. I usually wait till the jury goes out, so we can make sure. All right. So why don't we just go ahead and make it at 3:30 then, so it's close enough? Take 15 minutes [inaudible 03:31:51]? Okay, we'll take it.

Mr. Rottenborn: Your Honor, may I just wait for one request?

Judge Azcarate: Sure.

Mr. Rottenborn: Would you mind instructing the witness, and I think this will go for all the witnesses, that on the breaks, they're not to discuss their testimony with anybody?

Judge Azcarate: All right. You understand that, ma'am, since you are, right now, on the stand, you can't discuss this case, not even with the attorneys, okay? So don't discuss it with anybody till we get you back here in 15 minutes, okay?

Christi: Okay.

Judge Azcarate: All right. Thank you. Thank you. All right.

Are we ready for the jury? Okay. Are you ready?

Mr. Murphy: Just before he takes the witness back, Your Honor, you'll be pleased, we have that second order fully endorsed, so.

Judge Azcarate: I am very pleased.

Mr. Murphy: Yes, both of them are completed.

Judge Azcarate: That's great. I'll have an entry for my diary. Why don't you...Mr. Murphy? Thank you, Thank you so much.

Mr. Chew: Thank you, Your Honor.

Judge Azcarate: All right. Yes, sir. Yes, we're ready.

[03:32:44]

[silence]

[03:33:46]

All right. If we can just be seated and we're ready to start again. Okay. Yes, Mr. Chew.

Mr. Chew: Thank you, Your Honor. Good afternoon, again, Ms. Dembrowski. I'm told that both you and I need to speak a little closer to our microphones.

Christi: I'm sorry. Okay.

Mr. Chew: Thank you. And when we took the break, I think you had just testified that the next time you had seen Ms. Heard was when she had just returned from Australia.

Christi: Yes.

Mr. Chew: What, if anything, did you discuss with Ms. Heard when she returned from Australia?

Christi: Excuse me. We met for a late dinner, and she was telling me that she and Johnny had had a fight in Australia. And I was trying to talk to her about the idea that that kind of fighting is not normal. It's too much, you know. It's not okay. But she told me that I needed to, basically, get down off my cross and my mom business. She said that Johnny liked that she was feisty, you know. She was feisty, and then he loved it. And that Jerry Judge and I needed to stay out of her marriage. So that was the basic conversation.

Mr. Chew: Did you respond at all when Ms. Heard told you to get off your cross?

Christi: I just kept saying that fighting is not normal. This kind of fighting is not normal.

Mr. Chew: How close were you to Ms. Heard when you were having this conversation?

Christi: We were right next to each other, right? Like, right here.

Mr. Chew: Did you see any marks or any discoloration on her face?

Christi: No.

Mr. Chew: Now, Ms. Dembrowski, I'd like to shift gears again and ask you about the period in April and May of 2016. If you could please let us know, as of April 2016, what was the state of your mother's health?

Christi: Excuse me. Mom had been...she had been in the hospital for quite some time, and...like, a long steady pace from November. So by April, she was...we knew that she was towards the end of her life. So that's what April basically was. And it went into May. In May, we gathered everybody to come say goodbye to her.

Mr. Chew: How often, if at all, did you visit your mother in April 2016?

Christi: She was in the hospital. So I was with her pretty much every day. I was a 24/7 when I wasn't, you know, at the office or something, you know.

Mr. Chew: Did you ever see Johnny at the hospital?

Christi: Yes.

Mr. Chew: How often did you see Johnny at the hospital in April 2016?

Christi: I don't know how often I saw him. I mean, he would come and see her regularly, even before that, when there was a period we were trying to help her communicate, and he brought in different type/tools of pens, pencils, drawing crayons, just to try to help her communicate. He came as often as he could. He was there quite a bit.

Mr. Chew: And when you said you called the family together in May, would you please explain what you meant?

Christi: We were told by the doctors that mom was at a point where there was nothing else that we could do for her, and so that we should start calling anybody that wanted to, you know, come and spend a little bit of time and say their goodbyes. So we did that. We did that in May.

Mr. Chew: And moving ahead to May 19, 2016, what was your mother's condition that day?

Christi: She was basically in a coma. She was medicated and just on machines, life support, where it was, you know, slowly going away, on May 19th.

Mr. Chew: How do you know that?

Christi: I was with her.

Mr. Chew: Did you see your brother in the hospital that day?

Christi: Yes.

Mr. Chew: What happened the next day, May 20th, 2016?

Christi: Well, mom passed away that morning. We had...all the family was there. Johnny was there with his kids until the wee morning hours of May, you know, May 20th. My kids, my sister, we were all there, spending our last bits of time, and everybody else had gone home. And mom passed away probably a few hours after that, maybe five, six hours after that.

Mr. Chew: Who was with your mother when she passed?

Christi: I was.

Mr. Chew: Who, if anyone, told Johnny that your mother had passed?

Christi: Sorry.

Mr. Chew: Take your time.

Christi: I did. I called him, and I called our other siblings to tell them.

Mr. Chew: And I'm sorry, I know this is painful. How did Johnny react when you told him that your mother had passed?

Christi: Well, he was sad, but also, there's a relief that, you know, suffering is done, so. He was mostly trying to make sure that I was okay and I was going to leave and not stay there and, you know, sort of take on everything about myself.

Mr. Chew: So he asked about how you were doing.

Christi: Oh, yes, that became quite a big topic. Yes.

Mr. Chew: Ms. Dembrowski, did you see Johnny the next day, Saturday, May 21, 2016?

Christi: I did. I had gone to his house the night we lost mom. I think we all kind of gathered our children, right? And I had my sister with me. So I had driven her back on Saturday, and we were going to go to the funeral home. So while I was waiting for her, I went to go check on Johnny and see if he was okay and wanted to go.

Mr. Chew: And did you check on Johnny Saturday morning, the 21st?

Christi: Yes. Yes, I went to see him, because he was...we had talked about maybe he would also go to the funeral home. But when I got there, he seemed upset because he and Amber had been fighting.

Mr. Chew: What else happened when you first met with your brother on the morning of the 21st when you were talking about going to the funeral home?

Christi: I just went to go see if he was going to go with us. I got there. He was upset, excuse me, because they were fighting. I got upset because of the day that was chosen to fight. But I went ahead and left and went to the funeral home with my sister and then came back that evening.

Mr. Chew: Why were you upset about their fighting on that day, in particular?

Christi: We had just lost our mom the day before. So I feel like, you know, there might be the need for a little compassion, no fighting, on that day.

Mr. Chew: Did Johnny end up going with you to the funeral home that day?

Christi: No, I went ahead and went, and he was gathering his stuff, because he had to go pick up some items because he was going to go on tour.

Mr. Chew: Did you see Johnny again that day once you left him to go to the funeral home?

Christi: Yeah, I came back. That evening, I came back. I was taking care of my sister for a bit, and then, before I left to go home, I stopped at his house to make sure that he was okay, you know. And I saw him then.

Mr. Chew: And what happened when you went over to see that he was okay?

Christi: He was talking to a couple of people. You know, I saw him briefly. He seemed to be all right. And I spoke to Jerry Judge, and they had just come back from him picking up items down at the downtown at the loft.

Mr. Chew: So when you met him the second day that time...strike that. When you met him the second time that day on May 21, did you meet with him at his Sweetzer house or at the ECB?

Christi: No, I went to the Sweetzer house. He had gone down to the penthouse to pick up some of his stuff, because he was going to be leaving, you know, to go on tour. And I just stopped by after they had just gotten back.

Mr. Chew: And as of that time, the evening of May 21, your mother had just passed, what plans, if any, had been made for a funeral service for your mother?

Christi: We hadn't made any plans for a funeral service. We wanted to wait until we could get, you know, all the friends and family, because we weren't expecting the date, necessarily, but we wanted to wait till we can get all friends and family to come together to have more of, like, a dinner, like a celebration like mom would want at her favorite place. So

we waited. We decided to schedule it, like, a month or so out instead of immediate.

Mr. Chew: So you had referred to your brothers having plans to go on tour that next week, obviously, not knowing that his mother was going to pass.

Christi: Right.

Mr. Chew: What, if any, other formal events had been planned for that next week before he was going on tour?

Christi: Well, he had the premiere for Alice that was on the Monday night. Mom passed on Friday. And the premiere was Monday night. And then he was going to take a flight after that. Immediately after the premiere, he had to get on a plane to go to New York to meet the band and go on to Europe.

Mr. Chew: And when you say Alice, just so the jury may understand, if you could please explain to them what Alice is.

Christi: Oh, I'm sorry. Alice and...I'm so sorry. Right now, I don't know if it's "Alice Through the Looking Glass," maybe was that one's name or the "Alice in Wonderland" Disney series, where he played Hatter.

Mr. Chew: And so that premiere for "Alice in Wonderland" was going to be on Monday. And what day was Mr. Depp planning to go on tour with his music band?

Christi: He had to be there Tuesday morning. So we had to schedule it. It was very tight. We scheduled a plane for him immediately after the premiere. He would get on the plane.

Mr. Chew: So he was expected to leave on Tuesday. So, how long was he supposed to be on tour?

Christi: I believe it was a couple of months, something like that.

Mr. Chew: Going back to the premiere, how, if at all, did your mother's passing affect the premiere of "Alice in Wonderland?"

Christi: We didn't anybody know that mom had passed away. We kept that really close to just our, you know, just family and friends, because he had to go to the premiere. And with the premiere, he's on the carpet, and on the carpet, he does a lot. He does interviews, and it didn't feel right on many levels to have him where people knew that mom had passed away while he's trying to do interviews to sort of, you know, give

their condolences and their sympathies, and all of that. So we kind of kept it just with us so that it wouldn't become, you know, a worldwide thing, and he could just do what he was supposed to do and do his job.

Mr. Chew: Did you think he could handle hearing all that sympathy at the premiere?

Christi: I didn't think he should handle, I didn't think. I thought it would be very hard on him, you know. It would be very hard question after question and condolences.

Mr. Chew: Did there come a time when Ms. Heard filed for divorce from your brother?

Christi: Yes.

Mr. Chew: When was that?

Christi: I learned that she had filed on Tuesday morning after that premiere. Tuesday morning, I was at the funeral home, and I got a call from the attorney to let me know that she had filed.

Mr. Chew: Where was Johnny when you learned that Ms. Heard had filed for divorce?

Christi: He was already in New York and getting ready to travel to Europe for the tour.

Mr. Chew: How did you react, initially, when you heard from Mr. Depp's attorney that Ms. Heard had filed for divorce?

Christi: I mean, I think, understandably, you know, the timing of this, it made me sick, actually. It really made me feel ill. It made me sad, frustrated. I can't even find the word to describe how I felt when I heard that the divorce was filed the day after, you know...while I'm at the funeral home.

Mr. Chew: You didn't think the timing of Ms. Heard's filing was appropriate.

Christi: I did not. I thought something like that might have been able to wait.

Mr. Chew: Did there come a time when you learned that Ms. Heard had also filed for a restraining order against Johnny?

Christi: Yes. Yes. I think I heard that also from the attorney, I believe, the day before she was...I think it was a Thursday, I think, I learned that one.

Mr. Chew: So this was two days after your brother had left for New York?

Christi: Yes. Yes. Because I was shocked at that. I was shocked at that and concerned that he was out of town and didn't know if he needed to be there. He was gone, you know. And I was asking the attorney, and they said, "No, he doesn't have to be there. No one has to be there. Amber won't be there. No one will be there, just attorneys. It's a very simple process."

Mr. Chew: Did Johnny attend the restraining order hearing?

Christi: No, he was not in town. He wasn't in the country.

Mr. Chew: Did you see any press coverage of the restraining order hearing?

Christi: Yes, I did.

Mr. Chew: Would you please tell the jury what you saw or read?

Mr. Rottenborn: Objection, calls for hearsay.

Mr. Chew: I'm not asking for the proof of what was in the articles. To present sense, impression.

Mr. Rottenborn: Relevance. Why is it relevant?

Judge Azcarate: All right, I'll sustain it to hearsay and relevance.

Mr. Chew: Okay. Did you see press...was there press coverage of the hearing?

Christi: There was a tremendous amount of press coverage.

Mr. Chew: Did you read any of it?

Christi: I did. I did. I did read some of it. You know, I saw some of it.

Mr. Chew: Putting aside the truth or falsity of what you saw, what did you see?

Mr. Rottenborn: Relevance.

Judge Azcarate: And why is that?

Mr. Rottenborn: And hearsay.

Mr. Chew: Was the...?

Judge Azcarate: All right, I'll sustain the objection. Next question.

Mr. Chew: How did you feel when you read the press?

Mr. Rottenborn: Relevance, how the witness felt is irrelevant.

Judge Azcarate: What's the relevance, Mr. Chew?

Mr. Chew: I think it's relevant to her testimony, Your Honor, but I can move on.

Judge Azcarate: Okay, I'll sustain the objection. Next question.

Mr. Chew: Moving ahead two years in time, did you see Ms. Heard's Washington Post op-ed when it was published in December 18, 2018?

Christi: Yes.

Mr. Chew: What did you think Ms. Heard's op-ed was about?

Mr. Rottenborn: Relevance.

Mr. Chew: It's entirely relevant. They're trying to argue, somehow, that people didn't understand what the op-ed meant. We heard in opening where there was...

Judge Azcarate: Why don't you approach, please?

Mr. Chew: Yes, Your Honor.

[03:54:28]

[silence]

[03:54:49]

Ms. Dembrowski, have you had any discussions with your brother about the op-ed?

Christi: Yes.

Mr. Rottenborn: Object to anything after the yes is hearsay.

Judge Azcarate: I'm not sure if it is or not.

Mr. Chew: It's a yes or no question.

Judge Azcarate: Okay. All right, next question.

Mr. Chew: As Mr. Depp's brother and as his personal manager, do you have any understanding how the publication of the op-ed has affected your brother's career?

Mr. Rottenborn: Objection, foundation, Your Honor, and hearsay.

Judge Azcarate: I don't know if it's hearsay.

Mr. Chew: Oh, I apologize, Your Honor.

Judge Azcarate: That's fine.

Mr. Chew: But she's worked with her brother for...

Judge Azcarate: I'll allow that. Let's see where the answer goes.

Mr. Chew: You may answer.

Christi: I'm sorry, would you mind asking it again?

Mr. Chew: Do you have an understanding of how the publication of the op-ed has affected your brother's career?

Christi: Yes. The op-ed, as written, with the way it was written, the wordings within the op-ed make it very clear of a time frame.

Mr. Rottenborn: Objection, Your Honor.

Judge Azcarate: Give direction to answer that question. Maybe you should ask it again.

Mr. Chew: How has the publication of Ms. Heard's op-ed, putting aside for a moment its relationship to your brother, its references to your brother, how has it affected his career?

Christi: I believe there's a negative effect on anyone's career when there's accusations, you know, as there have been.

Mr. Chew: How has it affected him personally?

Mr. Rottenborn: Objection, foundation.

Mr. Chew: She's his sister, Your Honor.

Judge Azcarate: I'll allow it, go ahead.

Christi: Personally, I know he doesn't want people to feel that he could ever be that type of person, which he isn't, and to know that, actually, that is something that is attached to him now, which trickles down to his children, where I think that part, more than anything, is the part that has bothered him, the fact that his children have to have this in their life.

Mr. Chew: Ms. Dembrowski, do you believe that your brother physically abused Ms. Heard?

Mr. Rottenborn: Objection, Your Honor, relevance and foundation.

Judge Azcarate: I'll sustain the objection.

Mr. Chew: Do you believe that Ms. Heard is a public figure representing domestic violence?

Christi: No, I don't. I believe the opposite.

Judge Azcarate: Excuse me, I'll sustain the objection.

Mr. Chew: Thank you, Your Honor.

Judge Azcarate: Thank you. You can strike that answer, please. Thank you.

Mr. Chew: As his sister and as his personal manager for decades, are you aware of any occasion on which any woman other than Ms. Heard has ever accused your brother of any type of physical abuse?

Mr. Rottenborn: Objection, foundation, hearsay.

Judge Azcarate: I'll allow the answer.

Christi: No.

Mr. Chew: How has Ms. Heard's op-ed impacted your life?

Mr. Rottenborn: Objection, relevance.

Judge Azcarate: What's the relevance?

Mr. Chew: Thank you, Your Honor. That's all I have right now.

Judge Azcarate: Okay. All right, all drawn question, okay? All right. Cross examination.

Mr. Rottenborn: Thank you, Your Honor.

Judge Azcarate: Yes, sir.

[03:59:50]

[silence]

[04:00:13]

Mr. Rottenborn: Good afternoon, Ms. Dembrowski.

Christi: Good afternoon.

Mr. Rottenborn: So I believe we covered some of this, but just want to make sure. So you're employed at a company your brother owns, right?

Christi: Yes.

Mr. Rottenborn: It's called Infinitum Nihil?

Christi: Yes.

Mr. Rottenborn: Is that right? And it's Mr. Depp's production company?

Christi: Yes.

Mr. Rottenborn: And you're the president of that company, right?

Christi: Yes.

Mr. Rottenborn: And that is your only source of income, correct?

Christi: I have other projects that I work on on the side.

Mr. Rottenborn: It's your only job, right?

Christi: It's my full-time job, yes.

Mr. Rottenborn: Right. And job-wise, you don't have any other sources of income other than Infinitum Nihil, right?

Christi: Other projects. I have the opportunity with other projects to make more money.

Mr. Rottenborn: Okay. All right. Your Honor, may I approach?

Judge Azcarate: All right, if you could just show counsel what you're approaching with.

Mr. Rottenborn: It's just a copy of her deposition.

Judge Azcarate: All right. I think he's just giving copies, Mr. Chew. Oh, I assume it wouldn't be. Okay. Thank you. Yes, please.

[04:01:35]

[silence]

[04:01:51]

Mr. Rottenborn: Ms. Dembrowski, do you remember giving a deposition in this case?

Christi: Yes.

Mr. Rottenborn: And just a couple of months ago, right?

Christi: I believe so, yeah.

Mr. Rottenborn: And you remember, before you started that deposition, being under oath, right?

Christi: Yeah.

Mr. Rottenborn: Okay. And you swore to tell the truth.

Christi: Yeah.

Mr. Rottenborn: Okay. And you were asked questions by counsel for Ms. Heard, and you gave answers, right?

Christi: Yes.

Mr. Rottenborn: Okay. Could you please take a look at page 19 of that deposition transcript in front of you?

Christi: I'm sorry.

Mr. Rottenborn: And do you see, on page 19, line 8 through 10, you were asked the question, "Do you have any other sources of income other than from Infinitum Nihil?" and you answered no, job-wise, no.

Christi: Right.

Mr. Rottenborn: Do you see that?

Christi: I do.

Mr. Rottenborn: And was that testimony correct?

Christi: Yes.

Mr. Rottenborn: Okay.

Christi: But it's the same as what I said today.

Mr. Rottenborn: Now, you have a huge financial interest in your brother's career, right? The money that Infinitum Nihil makes comes from money that Mr. Depp makes, correct?

Christi: It hasn't always, historically, no.

Mr. Rottenborn: What else does it come from?

Christi: We've had deals with other entities, companies.

Mr. Rottenborn: And for the most part, the better your brother does in his career, the more money Infinitum Nihil makes, though, correct?

Christi: I don't think it's exactly like that, no.

Mr. Rottenborn: And you have...your brother has done projects that Infinitum Nihil has been the production company for, correct?

Christi: Yes.

Mr. Rottenborn: Okay. And you have a financial interest in that company, correct?

Christi: I'm an employee.

Mr. Rottenborn: Okay. Are you employed by his other companies as well?

Christi: I'm employed by Infinitum Nihil.

Mr. Rottenborn: Are you employed by the other companies that your brother has?

Christi: No.

Mr. Rottenborn: Where do you receive your paycheck from? Infinitum Nihil?

Christi: Infinitum Nihil.

Mr. Rottenborn: Okay. And you have a financial interest in how Infinitum Nihil performs financially, correct?

Christi: I have a salary that I get. So that's not a financial interest, if you're asking if I get a piece of the pie. No.

Mr. Rottenborn: You wouldn't consider salary financial interest, is that your concern?

Christi: I consider it a salary, yes, but it sounds like you're asking something different. I'm sorry. Maybe I misunderstood.

Mr. Rottenborn: Yeah. So the bottom line is you draw a salary from Infinitum Nihil.

Christi: Yes.

Mr. Rottenborn: And that's your brother's production company, correct?

Christi: Yes.

Mr. Rottenborn: Now, you feel protective of your younger brother, always have, right?

Christi: Yes.

Mr. Rottenborn: And you testified earlier today about Mr. Depp's reactions to some of your mother's anger growing up.

Christi: Mm-hmm.

Mr. Rottenborn: How old was Mr. Depp during the periods you were talking about? Like, when he was a kid, is that basically what you were talking about?

Christi: The reactions to mom's anger began when we were children, and we've had the same reaction always, was to leave.

Mr. Rottenborn: Right. And when you were testifying earlier about Mr. Depp's reaction being to leave, you were referring to when he was...before you left the house, when he was a kid, right?

Christi: Yes, but we left the house not too far apart from each other, but yes.

Mr. Rottenborn: Okay. When Mr. Depp would leave, as a child, during the times when your mother was angry at him, was he addicted to drugs back then?

Christi: No.

Mr. Rottenborn: Was he addicted to alcohol?

Christi: No.

Mr. Rottenborn: You testified a little bit about Mr. Depp's former partner, Vanessa Paradis. You were friends with Vanessa, right?

Christi: We were. It was a family, so.

Mr. Rottenborn: Right. You considered her family, Right?

Christi: Yeah. She was part of the family, yes.

Mr. Rottenborn: Right. And you were friendly with her?

Christi: Yes.

Mr. Rottenborn: You liked her?

Christi: Yes.

Mr. Rottenborn: You were happy that your brother was with her?

Christi: I was happy that my brother was happy.

Mr. Rottenborn: Yeah. And you didn't want to see him split up from Vanessa, did you?

Christi: You know what, I wanted both of them to be happy. It didn't matter to me if they split up or not.

Mr. Rottenborn: You were devastated when they split up, weren't you?

Christi: I don't think I was devastated.

Mr. Rottenborn: Were you happy about it?

Christi: No, I wanted my family to be okay.

Mr. Rottenborn: What were your emotions when you learned that your brother was splitting from Vanessa?

Christi: If I had to say, I was probably, you know, a little sad for both of them, but I mean, beyond that, I don't really recall big emotions.

Mr. Rottenborn: And you were sad because you were losing her as part of what you just testified was your family, right?

Christi: No.

Mr. Rottenborn: You weren't sad about that?

Christi: No.

Mr. Rottenborn: Now, on May 21st, 2016, you were asked some questions about that, and I know your mother's passing must have been very tough. So I'm not going to ask specific questions about that. I'm going to ask questions about the next day, just to make sure that I had your testimony right. Can you remind me? You said you saw your brother the morning of May 21st?

Christi: I stopped by there, at some point, yeah, in the daytime, in the early part of the day.

Mr. Rottenborn: Approximately, what time?

Christi: I honestly don't remember.

Mr. Rottenborn: Was it before lunch?

Christi: I don't remember the timing. It was just daytime.

Mr. Rottenborn: It was daytime. And you testified that when you stopped by there for the first time that day that you were upset because it seemed like he and Amber had been fighting. Is that what you said?

Christi: I said that they had been arguing. They had been arguing. And I've said that I didn't love that they were arguing on. It was a horrible day to argue on.

Mr. Rottenborn: And that was...your testimony was that you were upset that they had been arguing when you stopped by during the daytime, right? Okay. Now, you have no understanding of any of Amber or Mr. Depp's communications leading up to May 21st, correct?

Christi: I don't know that I have a lot of that, no.

Mr. Rottenborn: Okay. But your testimony is that when you stopped by during the daytime on May 21st that they had been fighting and that made you upset, is that right? I'm just trying to understand what you testified to.

Christi: It's not that it made me upset. I found it upsetting.

Mr. Rottenborn: Did you ever become aware that they hadn't actually seen each other or communicated at all before he came over at 8 p.m. on May 21st?

Mr. Chew: Objection, Your Honor, foundation.

Judge Azcarate: All right, foundation.

Mr. Rottenborn: She's testified that she said that they were fighting earlier in the day. I'm asking her if she ever became aware that they hadn't actually seen each other or talked that day.

Mr. Chew: Strike, foundation.

Judge Azcarate: I'll allow the question, just go ahead.

Mr. Rottenborn: I'll ask it again. Did you ever become aware that Amber and Mr. Depp hadn't seen each other or talked that day before he came to the Eastern Columbia Building, the evening of May 21st?

Christi: No. I just know that when...what I understood was that they had had a fight, whether it was over the phone or I don't know. They were arguing.

Mr. Rottenborn: Now, when your mother was in the last days of her life, in the hospital, Amber visited her, right?

Christi: Amber did come one time by herself, if that's what you're referring to. She did come one time, shortly before Johnny was also coming.

Mr. Rottenborn: And she visited her actually more than one time, correct?

Christi: I don't recall her visiting on her own more than one time, no. I remember her coming one time because I didn't know she was coming, and Johnny was actually also coming.

Mr. Rottenborn: Right.

Christi: So they ended up there together.

Mr. Rottenborn: I guess I'm a little confused, because you just testified that she only visited one time.

Christi: Alone. This is what I'm saying. I only remember the one time, alone, where she showed up alone. I only remember one time. And Johnny came shortly after she was there.

Mr. Rottenborn: And other times, she visited with Johnny or other people, is that right?

Christi: She visited with Johnny sometimes.

Mr. Rottenborn: During the time that Amber and Johnny were together, you became aware that he was using drugs and alcohol excessively, correct?

Mr. Chew: Objection, beyond the scope [inaudible 04:11:44].

Judge Azcarate: All right.

Mr. Rottenborn: Your Honor, she's testified to what she observed during their relationship. I think it's within the scope.

Mr. Chew: [inaudible 04:11:51] I think is beyond the scope.

Judge Azcarate: No, I'll rule the objection. You can ask the question. Go ahead. Did you want to ask the question again?

Mr. Rottenborn: I do, yeah.

Judge Azcarate: Okay.

Mr. Rottenborn: During the time that Amber and Johnny were dating, did you become aware that he was using drugs or alcohol excessively?

Christi: I became aware that he had been drinking. And during the time they were dating, I became aware of, at one point, you know, a certain medication, yes.

Mr. Rottenborn: And you form the opinion that, not only had he been drinking, but he was drinking excessively, correct?

Christi: I don't know that I formed excessively, but he was drinking.

Mr. Rottenborn: You became aware that he was using booze, right?

Christi: I knew he was drinking, yes.

Mr. Rottenborn: And you knew he was using cocaine, right?

Christi: I never saw him do that, so.

Mr. Rottenborn: You became aware that he was using cocaine, correct?

Christi: I never saw him use anything like that. I became aware of people saying that.

Mr. Rottenborn: Right. And you became so concerned about that that you told your brother to stop using cocaine, correct?

Christi: I don't know that I remember telling him to stop using cocaine. I think I might have told him anything that he was doing he should stop doing.

Mr. Rottenborn: Heather can you pull up Exhibit 214, please? Your Honor, I'll obviously move for admission before it's published to the jury.

Judge Azcarate: That's fine.

Mr. Rottenborn: I just wanted to make sure it wasn't going to be on their screen.

[04:14:04]

[silence]

[04:14:31]

Can you flip it?

[04:14:32]

[silence]

[04:14:55]

Just trying to figure out how to rotate this, Your Honor.

Judge Azcarate: If it's coming from her computer screen, you have to rotate it on there.

Mr. Rottenborn: I figured.

Judge Azcarate: All this is doing is mirroring whatever was on the computer screen. There's nothing we can do.

[inaudible 04:15:05]

Mr. Rottenborn: Sorry for the delay, Your Honor. Appreciate your patience.

Judge Azcarate: Yes, sir.

[04:15:13]

[silence]

[04:15:39]

Mr. Murphy: If I may, Your Honor, the issue is what's on the screens, not on the laptops.

Judge Azcarate: Okay. I don't know. Do you want to unplug it and plug it back in just to see, to the system?

[04:15:57]

[silence]

[04:16:24]

Mr. Rottenborn: All right, I think we have it.

Judge Azcarate: When you turn it off and on, it works at everything.

Mr. Rottenborn: That's right. That's the secret.

Okay. All right. That looks better. Ms. Dembrowski, I'd like to direct your attention to the four texts in the middle of the page. If you look in the From column, there's a name that says Christi Dembrowski, and it has a number. Is that your number?

Christi: Yes.

Mr. Rottenborn: Okay. And are those texts from you to your brother, Johnny Depp?

Christi: Yes.

Mr. Rottenborn: And those texts were sent on or about February 5th, 2014?

Christi: Yes.

Mr. Rottenborn: Okay. Your Honor, I'd move for the admission of Defendant's Exhibit 214.

Judge Azcarate: Any objection to 214?

Christi: Can I just say something?

Judge Azcarate: No, just wait, ma'am. Just wait for a question.

Christi: I'm sorry.

Judge Azcarate: Yes, sir. All right, so you're moving in 214. We'll receive it redacted, correct?

Mr. Rottenborn: Yes, Your Honor.

Judge Azcarate: Okay. Over objection? That's fine. And you wanted to publish just the redacted parts, correct?

Mr. Rottenborn: Yes, Your Honor.

Judge Azcarate: Okay. That's fine. Right now, you just have the dates up. Is that what you want to start with?

Mr. Rottenborn: Yes, Your Honor.

Judge Azcarate: Okay.

Mr. Rottenborn: Thank you.

Judge Azcarate: You can publish that to the jury. Okay.

Mr. Rottenborn: Ms. Dembrowski, just because we can only show part of this page, do you see that these...you just testified these were text messages between you and Mr. Depp, right? And do you see that these text messages were sent on February 5th, 2014?

Christi: Yes.

Mr. Rottenborn: The bottom three? Okay. And those bottom three, you just looked at when we saw the whole page, and I know it's a little cumbersome for the jury not seeing that, but you testified that the bottom three were text messages from you to your brother, right?

Christi: Yes.

Mr. Rottenborn: Okay. Heather, could you just scroll to the right, please? That's good, thank you. So, on February 5th, 2014, you sent three texts to your brother. You sent one that said, "Stop drinking," right?

Christi: Mm-hmm.

Mr. Rottenborn: You sent one that said, "Stop coke," right?

Christi: Yes.

Mr. Rottenborn: I assume you weren't talking about the soft drink, right?

Christi: It doesn't appear to be.

Mr. Rottenborn: You were talking about cocaine, correct?

Christi: I don't know what these are in reference to, so. I remember they brought this up at my deposition, and these are something that...I don't know. I don't know if there's more context to them. I don't know what they're in reference to. I know what they say, but I don't know what they're in reference to.

Mr. Rottenborn: And what they say is that, on February 5th, 2014, you were telling your brother, Johnny Depp, to stop using cocaine, correct?

Christi: No. I wrote those words, but that's what I'm saying, I don't know that I was telling him to stop doing that. You know, in context, it would be different. It could be a different scenario.

Mr. Rottenborn: Well, let's take it word by word. Coke, when you wrote coke, you meant cocaine, not the soft drink, right?

Christi: Yeah.

Mr. Rottenborn: Okay. And when you wrote pills, you meant prescription pills, right?

Christi: Yeah.

Mr. Rottenborn: Okay. So you were telling him on February 5th, 2014 to stop drinking, stop coke, and stop pills, right?

Christi: I wrote the words.

Mr. Rottenborn: And did you have any reason to believe, when you wrote that, that Mr. Depp had been on a bender recently?

Christi: I don't recall writing this, so I don't recall the context of it. I understand that the words are there, but I don't recall the timing or the writing of it. I don't recall anything about it, necessarily.

Mr. Rottenborn: You weren't joking when you wrote that, right? It wasn't a joke, right?

Christi: I probably was not joking, but you know, maybe I was repeating something that someone else told me to write.

Mr. Rottenborn: You were telling your brother to stop drinking, stop cocaine, and stop pills because you believed that he had a problem with drinking, cocaine, and pills, correct?

Christi: I didn't believe he had the problem as much as someone else was trying to make me believe that he had the problem.

Mr. Rottenborn: Did you have any reason to believe that Mr. Depp had been on a recent bender?

Christi: I didn't witness benders. I don't...you know what I mean? So I'm not involved in the benders.

Mr. Rottenborn: Understood. I'm asking, at the time when you sent these three text messages, on February 5th, 2014, did you have any reason to believe that Mr. Depp had been on a recent bender?

Christi: I couldn't tell you about February, whatever date that is, back then, and what I would know at this moment.

Mr. Rottenborn: Did you have any reason to be worried about Mr. Depp when you sent these texts?

Christi: Again, I don't know what was happening in life at that time. I don't recall that period, the dates. I don't recall where we...I don't recall anything about that time. These texts, I know what the words are, but I don't know what the context is of them.

Mr. Rottenborn: Right. And so I'm asking you a question as best I can, which was, when you sent these texts, did you have any reason to be worried about Mr. Depp's use of alcohol, cocaine, or pills?

Christi: Again, I don't recall the time period of sending these texts, so I don't know that I would have any reason at that time. I don't know.

Mr. Rottenborn: Would you have sent the text if you didn't have a reason to be worried about his use of alcohol, cocaine, or pills?

Christi: I could send those three separate lines like that, three separate texts, I could do that if it was...you know, there's different reasons that maybe I could do that. It doesn't mean that was me giving him a message.

Mr. Rottenborn: Have you ever sent texts to anyone else to tell them to stop drinking, stop coke, or stop pills before?

Christi: Again, I don't know that I'm telling him to stop drinking, stop coke, and stop pills. That's what I'm saying. It's the context of this.

Mr. Rottenborn: And I appreciate that, but that wasn't my question. My question was, have you ever sent texts to anyone else in your life telling them to stop drinking, stop coke, or stop pills?

Christi: I don't believe I've ever told anybody to stop doing any of those things in a text message, but I also don't know that that's what I was doing here, is what I'm trying to say.

Mr. Rottenborn: But you wrote those words to Mr. Depp, right?

Christi: I wrote those words.

Mr. Rottenborn: And you didn't love the behavior that Mr. Depp was engaging in around this time frame, did you?

Christi: I don't know the time frame. I don't know what time frame you're actually referring to.

Mr. Rottenborn: Well, in the days leading up on or around February 5th, 2014, you didn't love the behavior that Johnny Depp was engaging in, did you?

Christi: I don't recall anyone's behavior from February 2014. I don't recall February 2014.

Mr. Rottenborn: Would it refresh your recollection, perhaps, to see other text messages that you sent on around this time to determine whether or not you were worried about Mr. Depp?

Christi: If there's other context, I guess. I don't know.

Mr. Rottenborn: Why don't we do this? Heather, can you please pull up Exhibit 210?

[04:24:52]

[silence]

[04:25:14]

Your Honor, may I approach?

Judge Azcarate: All right.

Mr. Rottenborn: Thank you.

[04:25:17]

[silence]

[04:25:32]

Ms. Dembrowski, do you recognize this document as a text message chain between you and Amber Heard on February 3rd, 2014?

Christi: Yes.

Mr. Rottenborn: And you see the chain starts at about 5:20 p.m., right?

Christi: Yes.

Mr. Rottenborn: And there's messages from Amber to you are the ones on the right, correct, in blue?

Christi: Yes.

Mr. Rottenborn: And messages from you to Amber are the ones in gray on the left, right?

Christi: Yes.

Mr. Rottenborn: Okay. And if you go...well, take a minute and just read that first page, please.

[04:26:12]

[silence]

[04:26:44]

Does this refresh your recollection about a text conversation you had with Amber on or about February 3rd, 2014?

Christi: Well, I can see this is our text exchange.

Mr. Rottenborn: Okay. And does this refresh your recollection about concern that you may have had about the behavior that Mr. Depp was engaged in on or around that time?

Christi: Again...

Judge Azcarate: I'll allow it. I'll allow that question. Go ahead.

Mr. Rottenborn: I'll ask it again. Does this refresh your recollection about behavior that Mr. Depp may have been engaging in around that time?

Christi: I remember this period and what Amber was believing that he was doing, yes, at this period.

Mr. Rottenborn: Okay. And does this refresh your recollection about your worry and concern for your brother, Johnny Depp, around this time?

Christi: I still don't recall having a severe worry around this time.

Mr. Rottenborn: Okay. Well, before you didn't recall having any worry, so does this at least refresh your recollection that you had some worry?

Christi: Honestly, I don't recall having to worry, you know. I've had worries in the years, but I don't recall having to worry at this time. I don't recall it.

Mr. Rottenborn: Okay. So, did you have any reason to doubt what you were reading from Ms. Heard in these texts?

Christi: To be honest, she would write things quite often or explain things quite often, and it's a bit more dramatic, maybe, than what we understood it to be or maybe even, sometimes, the instances were different than what she was describing, so.

Mr. Rottenborn: But in any event, this conversation that you had with Ms. Heard gave you concern enough to tell your brother stop coke, stop pills, stop booze, right?

Christi: No, I don't think it did.

Mr. Rottenborn: It didn't. And I've asked this before, but we'll take a look at this. Is it true, you didn't love the behavior he was engaging in around this time, right?

Christi: Again, I didn't witness a lot of the behavior that people are...you know, that you guys are referencing. I didn't witness a lot of it.

Mr. Rottenborn: Okay. All right. Take a look at page 2, please.

Christi: Okay.

Mr. Rottenborn: And just take a minute to read that, and then I'll have some questions about both of the pages.

Christi: Mm-hmm.

[04:29:42]

[silence]

[04:30:01]

Mr. Rottenborn: Okay. What you had been told by Ms. Heard on the first two pages of these texts gave you concern about Mr. Depp's behavior and made you not love anything that he was engaging in, behavior-wise, around this time, right?

Christi: What I had heard from her in these texts, I didn't really love where life was at the time.

Mr. Rottenborn: Your Honor, I'd move for the admission of these two pages, in their entirety, for the reasons that we discussed both as impeachment of the witness.

Judge Azcarate: All right. There are other statements in here that I do find as hearsay, so we can work with it. I'll reserve on that for this time maybe, and we'll have other issues with it outside the presence of the jury, and we'll work on redactions, okay?

Mr. Rottenborn: Okay, that sounds good. Can I ask her questions just about her language?

Judge Azcarate: Okay.

Mr. Rottenborn: And then we can work on redactions.

Judge Azcarate: Yes, sir.

Mr. Rottenborn: Okay.

Mr. Chew: [inaudible 04:31:08].

Judge Azcarate: Okay. Yes, sir.

Mr. Rottenborn: On the first page, Your Honor...or I'm sorry. On the first page, Ms. Dembrowski, you write, "Where are the kids?" Why did you write that to Ms. Heard?

Christi: I don't know. I mean, I remember, they asked me that at the deposition. I'm not sure.

Mr. Rottenborn: You wrote that because you had concerns about where Mr. Depp's kids were at this time, right?

Christi: Well, if she was saying, "He wasn't home," I was asking where the kids were.

Mr. Rottenborn: Right. Because you were concerned for the kids' well-being, particularly, when Mr. Depp was in this sort of state, correct?

Christi: No, I was curious about where the kids were if he wasn't home.

Mr. Rottenborn: Were you ever concerned about the impact on the kids of Mr. Depp's drug use and alcohol use?

Christi: No.

Mr. Rottenborn: Okay. So, when you wrote, "Where are the kids?" you had no concern for their actual well-being, is that right?

Christi: The concern...it's not that kind of concern. She's saying, "He's not home." I was wondering where the kids were so that they weren't alone.

Mr. Rottenborn: When you wrote her, on page 2, "Do you want to come to office to talk?" you wrote that because you were concerned about what was going on with Mr. Depp at that point, right?

Christi: No, actually. I wrote that so that she could come to the office so that we could talk about all of it.

Mr. Rottenborn: All of what?

Christi: Of her text.

Mr. Rottenborn: Your Honor, I'd ask for permission to publish the bottom text on page 2 that I think...

Judge Azcarate: It's not up here. You just need her text.

Mr. Rottenborn: Sorry. And I guess, while she's pulling that up, I'd move for partial admission of Exhibit 210 with redactions to be...

Judge Azcarate: Again, I'm going to reserve on that, okay?

Mr. Rottenborn: Okay.

Judge Azcarate: All right, that's... All right. I'm still going to reserve on the admission of it, so I'm not going to show it to the jury at this time, okay?

Mr. Rottenborn: Okay. Okay.

Judge Azcarate: But you can ask your questions about it.

Mr. Rottenborn: Okay, thank you, Your Honor. When you wrote Ms. Heard on February 3rd, 2014 at 5:42 p.m., Ms. Dembrowski, "Worry about everything," you were telling her to worry about everything and all the types of behavior that Mr. Depp was engaging in at that time, right?

Christi: I was not telling her to worry about anything. That's the way I wrote. That sounds like I say, you know, "I worry about everything."

Mr. Rottenborn: You're saying that you're worrying about everything, is that right?

Christi: Yes, as a whole.

Mr. Rottenborn: Okay. So, in contrast to what you testified a few minutes ago, you actually were very worried around this time frame, correct?

Christi: I was worried about what life was, that's what I said.

Mr. Rottenborn: And the life that you were referring to here, what was going on in life was Mr. Depp's drug and alcohol abuse, correct?

Christi: What was going on in life was someone who constantly wanted to point out some sort of drug and alcohol abuse.

Mr. Rottenborn: Is that unfair for a spouse not to want their husband to abuse drugs and alcohol?

Christi: It's not unfair at all.

Mr. Rottenborn: Yeah. So, was that a negative to you that Ms. Heard didn't love that?

Christi: I'm sorry?

Mr. Rottenborn: Was that a negative to you that Ms. Heard didn't love Mr. Depp's drug and alcohol abuse? Was that unreasonable of her?

Christi: To me, it was exaggerated, is the problem, so.

Mr. Rottenborn: It was exaggerated. But you testified that you personally have no personal knowledge of your brother doing cocaine.

Christi: I never saw him do it, no.

Mr. Rottenborn: Okay. But you had enough concern to text him stop doing coke, stop the pills, and stop the drinking, correct?

Christi: No, I really don't think that's what I was doing with him.

Mr. Rottenborn: What were you...you weren't talking about the Super Bowl, right? You were talking about drinking, coke, and pills.

Christi: I understand. But the way it's written, and I know my writing, the way it's written, I don't feel like what I was doing was me giving him an order to do that. I wouldn't typically do that. So there's other context somewhere, you know, for that.

Mr. Rottenborn: Right. And that's what we're trying to explore, is, what is that context? Because you're very direct in those texts that the jury just looked at, stop the booze, stop the pills, stop the coke. So if you weren't telling him to stop the booze, stop the pills, and stop the coke, what were you telling him?

Christi: I could have been telling him that, because I've had this conversation before, I could have been telling him that in order to make her not constantly accusing, this is what she would need.

Mr. Rottenborn: Right. You didn't write those words in your text, though, right?

Christi: No, I didn't.

Mr. Rottenborn: Okay. And when you said in the February 3rd text message exchange with Ms. Heard, "I don't love any of it. I really want to be able to talk with him," that was you expressing concern about Mr. Depp's drinking and drug use, correct?

Christi: That was me expressing concern about what life was, and there was arguments all the time, and it felt like there was just constant unpleasantness.

Mr. Rottenborn: Right. And would it be unfair...well, let me ask it this way. That unpleasantness, to your knowledge, was caused, in part, at least, by your brother's drug and alcohol abuse, right?

Christi: I don't know that.

Mr. Rottenborn: Did you ever reach your own conclusion that your brother had a problem with drugs and alcohol?

Christi: I knew my brother was drinking.

Mr. Rottenborn: I'm sorry.

Christi: I knew my brother was drinking. But in terms of, like, drugs, you know, honestly, there was...I had only one medication that I really knew of that, you know, was an issue for him.

Mr. Rottenborn: And what was that?

Christi: I don't remember the name of the medication. It was a prescription medication.

Mr. Rottenborn: What was it?

Christi: It was, like, a pain medication that he had been taking for a long time.

Mr. Rottenborn: Okay. And that was what you were referring to when you said, "Stop pills," was prescription pain medication, correct?

Christi: Again, I wasn't necessarily referring to anything in particular. I know I wrote those words. I don't know the context of the words.

Mr. Rottenborn: Okay. But in any event, you don't dispute that, on February 5th, 20...whatever date that was, on February 5th, 2014, you wrote your brother, "Stop drinking," "Stop coke," "Stop pills," right?

Christi: I wrote those words, but I don't know the context of the words.

Mr. Rottenborn: Now, February 2014 wasn't the first time that you had communications with Ms. Heard relating to concerns about drug and alcohol abuse, right, by Mr. Depp, correct?

Christi: I don't know.

Mr. Rottenborn: Heather, if you could pull up Exhibit 163, please.

Judge Azcarate: What's the exhibit number? I'm sorry.

Mr. Rottenborn: Oh, I'm sorry, Your Honor, 163.

[04:39:17]

[silence]

[04:39:42]

While she's pulling that up, Ms. Dembrowski, let me ask you this. You knew that Mr. Depp's drug and alcohol problem was affecting his relationship with Ms. Heard, right?

Christi: I knew that she would say that. I mean, I knew that she would say that she had issues with, you know, him with drugs and alcohol.

Mr. Rottenborn: Okay. And you knew from those communications that it was negatively impacting their relationship, right?

[04:40:16]

[silence]

[04:40:33]

Christi: I knew that she would write me about them, and I know that she would try to talk about them, but... And I know that she would say that they were negatively impacting. I don't know that that was the whole situation that they had going on, to be honest, though.

Mr. Rottenborn: Well, you didn't disbelieve her when she told you that, right?

Christi: When she told me?

Mr. Rottenborn: What you just testified to, that drinking and drugs were negatively impacting their relationship, you didn't disbelieve her, right?

Christi: Oh, I didn't necessarily think it was true, no.

Mr. Rottenborn: You didn't think it was true?

Christi: That it was negatively impacting their relationship, I didn't necessarily think it was 100% true, no.

Mr. Rottenborn: Well, you just said true and then 100% true. So I'm trying to figure out. I'm trying to figure out where you're going with this. Is it your testimony today that you never believed Ms. Heard when she would talk to you about Johnny's drugs and drinking?

Christi: No, I think you're taking it to an extreme.

Mr. Rottenborn: Well, that's what I'm trying to get at. I'm sorry if I am. So just explain to me what...that's not your testimony, so...

Christi: I think she exaggerated things quite a bit.

Mr. Rottenborn: But you tried to help Amber deal with Mr. Depp's drugs and drinking, correct?

Christi: I tried to make sure that I was helpful to Amber as best as I could, yes.

Mr. Rottenborn: Okay. If you can look at the document in front of you, Exhibit 163, please. This is a text exchange between you and Ms. Heard on March 22nd, 2013, correct?

Christi: Yes.

Mr. Rottenborn: And do you remember, earlier, you testified about being present during the filming of a documentary about Keith Richards?

Christi: Yes.

Mr. Rottenborn: This was right around that time frame, correct?

Christi: I don't know.

Mr. Rottenborn: Do you recall when that was?

Christi: I don't recall the dates.

Mr. Rottenborn: And actually, one thing I wanted to ask you about that while we're at it is, you testified earlier about not seeing cuts or bruises on her face, do you remember that? You have no knowledge whether she was wearing makeup or not that night, right?

Christi: I don't recall if she was wearing makeup or not. She typically did not.

Mr. Rottenborn: Okay. And you weren't specifically looking for cuts or bruises because you suspected that Mr. Depp had abused her, right?

Christi: I would have no reason to look for cuts or bruises, but I would think if they were there, I would see them.

Mr. Rottenborn: Okay. So if you look at page 1, Exhibit 163, and, Your Honor, I'd move for permission to publish.

Mr. Chew: Your Honor, we object.

Judge Azcarate: I'm going to sustain that objection.

Mr. Rottenborn: I figured you would.

Judge Azcarate: Okay.

Mr. Rottenborn: But can I do the same thing and ask her about her words to Ms. Heard? And then we can...reserving the right to publish it to the jury, depending on Your Honor's ruling.

Judge Azcarate: You can ask her if it refreshes her memory about the conversations you're trying to discuss, yes.

Mr. Rottenborn: Sure. Thank you. So, Ms. Dembrowski, do you recall having a conversation with Ms. Heard on or about March 22nd, 2013, in which Ms. Heard was expressing concerns to you about Mr. Depp's behavior?

Christi: No. I don't recall dates, so no.

Mr. Rottenborn: Okay. Why don't you go ahead and take a look at this document, please? And let's just...let's start with...just tell me when you're done with page 1, please. Oh, Ms. Dembrowski, I think that's you on the screen, which is okay if you want to mark it up.

Judge Azcarate: We can clear it up. We got it.

Christi: I didn't...

Mr. Rottenborn: Oh, I'm sorry. Oh, okay. Doing their own redactions.

Judge Azcarate: Okay.

Christi: Okay, I've read it.

Mr. Rottenborn: Okay. So when you texted Ms. Heard...well, first of all, does this refresh your recollection about a conversation that you and Ms. Heard had on March 22nd, 2013 relating to Ms. Heard's concerns about Mr. Depp's behavior?

Christi: It really doesn't, but I see it here.

Mr. Rottenborn: But you don't dispute that it is a conversation that the two of you had.

Christi: This is a text exchange between the two of us, yes.

Mr. Rottenborn: Okay. When you wrote, "Don't be sorry! I am not completely sure if what is going on or why, but I don't love what it is," what did you mean by that?

Christi: I'm not 100% sure. I believe I probably meant, once again, you know, how life was.

Mr. Rottenborn: Right. Life including Mr. Depp's conduct toward my client, Amber Heard, right?

Christi: Yeah.

Mr. Rottenborn: Okay. And when you wrote, "It is sad and I'm sorry you guys are going through this. I'm here if there's anything I can do," you were talking about the chat, you were sad that they were going through the challenges that drugs and alcohol, on behalf of Mr. Depp, were posing to their relationship, correct?

Mr. Chew: Objection, Your Honor.

Judge Azcarate: I'll allow it. She can answer it.

Christi: I don't think that I'm saying that I'm sad about that. I'm saying that I'm sad, you know, about whatever it is that, you know, that they're going through. But I don't know exactly what it is that they're going through.

Mr. Rottenborn: Right. And right two texts underneath that, Ms. Heard tells you what they're going through, right?

Christi: She does go into about, yeah, what they have going on.

Mr. Rottenborn: And then, below that, you say, "I think, with anyone in that place, confrontation, unfortunately, doesn't help and sometimes conversations can seem like confrontations," do you see that?

Christi: Mm-hmm.

Mr. Rottenborn: Were you suggesting to Ms. Heard that she shouldn't have a conversation with Mr. Depp about what drugs and alcohol did to him because it could seem like a confrontation?

Christi: No. No, I was not suggesting that at all.

Mr. Rottenborn: What did you mean by it?

Christi: Honestly, what I was trying to do is trying to...Amber, Ms. Heard, she could be very, very vocal, and so what I was trying to do was, if they were having a conversation, if it wasn't going well, I was trying to tell her that, you know, maybe, you know, sometimes conversations, if you're vocal, really loud, they're more confrontational. Like, just whatever it is, just have a nice, easy conversation.

Mr. Rottenborn: Okay. Well, let's just go to the...I just want to look at one more text on the top of the next page. Heather, please. When you write Ms. Heard on March 22nd, 2013, you say, "Disagreeing, reasoning, nudging, all can seem like confrontations. I am not sure of the volume or when some is likely to wear off?" First of all, when you were talking about "volume or when some is likely to wear off," you're talking about drugs or alcohol, correct?

Christi: She said in the text prior, right?

Mr. Chew: Your Honor, direction of hearsay.

Mr. Rottenborn: I'm asking...

Mr. Chew: That's the problem.

Judge Azcarate: No, I understand. I'll sustain the objection.

Mr. Rottenborn: And I'm asking what you're referring to, without referring to Ms. Heard's text prior, when you say, "I'm not sure of the volume or when some is likely to wear off," what are you referring to?

Christi: I don't know. I mean, that's what I'm trying to say, is she had all kinds of things that she said in the text prior. I'm referring to, like, volume of even just voices. Even you can see where I say, like, you know, the nudging and all of that. You know, there was a certain way that you learned to try to talk with Amber to keep things calm.

Mr. Rottenborn: Okay. And when you said...

Mr. Chew: [inaudible 04:48:57].

Mr. Rottenborn: I thought she was.

Judge Azcarate: All right, [inaudible 04:49:00].

Mr. Chew: [inaudible 04:49:01]

Judge Azcarate: Mr. Chew, that's fine. Thank you. I appreciate it. I understand. I'll let her finish, first, her answer. That's fine, Mr. Chew.

Christi: Thank you. Thank you. There was a certain way that, you know, ultimately, you learn to talk to Amber, you know, to sort of keep things calm. So you would pacify her. You would sort of, you know, just go along with all of her conversations, whatever, so that you could...we would placate her all the time to keep things calm. That's what we did.

Mr. Rottenborn: And so, when you said, "Disagreeing, reasoning, nudging, all can seem like confrontations," were you telling Ms. Heard that she shouldn't voice any concerns about her significant other's drug or alcohol abuse?

Christi: Voice any concerns to who?

Mr. Rottenborn: To him, that she shouldn't nudge him about it or try to reason with him about drug and alcohol abuse or his behavior. Is that what you were saying that she shouldn't do that because it might seem like a confrontation?

Christi: No, she was more confrontational. She was much more confrontational, always confrontational. And I was trying to say that all of these things can be confrontational and maybe take it down a notch.

Mr. Rottenborn: Okay. So you shouldn't disagree or reason or nudge, is that what you were saying?

Christi: No. In the way that I know that it would be done, she was much more...she wasn't...you know, there wasn't a comforting conversation.

Mr. Rottenborn: I'm sorry. I'm sorry for interrupting. Were you done with your answer?

Christi: I think so.

Mr. Rottenborn: Okay. Do you believe that disagreeing with someone or trying to reason with them or nudging them justifies them getting abused?

Mr. Chew: Your Honor, lack of foundation.

Judge Azcarate: As to foundation, I'll sustain as to foundation.

Mr. Rottenborn: Okay. Do you have any...have you ever disagreed with or reasoned with or nudged anyone in anything in your life?

Mr. Chew: Your Honor, [inaudible 04:51:10] hypothetical.

Judge Azcarate: All right.

Mr. Chew: The exact words.

Mr. Rottenborn: I mean, these are the words that she wrote.

Mr. Chew: Explained today.

Judge Azcarate: I know...

Mr. Rottenborn: These are the words that you wrote to my client, "Disagreeing, reasoning, nudging, all can seem like confrontations."

Judge Azcarate: I'll allow the question.

Mr. Rottenborn: Thank you.

Christi: I'm sorry?

Mr. Rottenborn: Have you ever disagreed or reasoned or nudged with someone in your life?

Christi: Yes.

Mr. Rottenborn: Okay. Do you believe that doing any of those three things would justify you're being abused?

Mr. Chew: Your Honor, this is...

Judge Azcarate: I'll sustain the question.

Mr. Rottenborn: Withdrawn.

Judge Azcarate: Sustain. Okay. Thank you. All right. How much more do you have probably?

Mr. Rottenborn: A little bit.

Judge Azcarate: A little bit, okay, since it's 5:00.

Mr. Rottenborn: About an hour.

Judge Azcarate: All right, about an hour, okay. All right. Ladies and gentlemen, since it's 5:00, we're going to go ahead and release you for the day, okay? Just a reminder, as always, please don't do any outside research, don't talk to anybody about this case, don't look at the news, don't watch anything on TV, don't read the papers, and just have a good, calm, peaceful night, okay? And we'll see you tomorrow, bright and early, okay? Thank you.

Well, a hard copy of 210.

[04:52:23]

[silence]

[04:52:41]

Thank you. All right. Ms. Dembrowski, just a reminder that you are still under oath and you're still testifying. So since you're still testifying, you can't have any discussions with anybody, to include Mr. Depp's attorneys or his legal team, okay?

Christi: Okay.

Judge Azcarate: All right. And we'll see you tomorrow morning, all right? If you could leave the courtroom, I just have a few housekeeping matters I need to take care of.

Mr. Rottenborn: And that includes Mr. Depp as well, correct?

Judge Azcarate: Correct, and Mr. Depp, yes, anybody, okay?

Mr. Rottenborn: Thank you.

Judge Azcarate: Just don't talk about your testimony to anybody, okay?

Christi: Yeah, okay.

Judge Azcarate: All right, that's fine. If you can have a seat outside the courtroom, I just have a few housekeeping matters I want to take care of.

[04:53:11]

[silence]

[04:53:40]

You can sit down, it's okay. If you want to stand up, that's fine. I just want to... Let me finish this one issue first, okay? I'd appreciate it. All right, going back to the text. So, on 163, are you still trying to admit that into evidence? That was the last one.

Mr. Rottenborn: Yes, Your Honor.

Judge Azcarate: All right. And there's an objection to that. Okay. Okay, good.

Mr. Chew: [inaudible 04:54:03].

Judge Azcarate: All right. Yes, sir. Anything further to say on 163?

Mr. Rottenborn: Well, I think, yes, two things. At a minimum, Ms. Dembrowski's texts should be [inaudible 04:54:14] because those aren't hearsay, even if we have to redact out all of Ms. Heard's texts, which if that's what [inaudible 04:54:21] we can. The problem is and the reason I think it's not hearsay is that it's impeachment under 607 A7...

Judge Azcarate: I understand your impeachment issue, and I understand that. We'll go back to 210, and I think there's an issue with impeachment there. But here, I don't see any impeachment basis to have the extrinsic evidence in. You got the testimony in, but I don't see a basis to have the extrinsic evidence.

Mr. Rottenborn: And I would still ask that her text, I mean, not through impeachment, they're not hearsay but probative to this case that she's expressing concern, and even the jury can't see context because she can't see [inaudible 04:54:55].

Judge Azcarate: Since they couldn't have the context, I'm not going to allow them in. So I'm going to deny...I'm going to sustain the objection to 163. As far as 210, the only impeachment basis was when she testified that she didn't recall anything about a bender or him being on a bender. So I think, for impeachment purposes, just the only part that comes in as

far as Ms. Heard's text, is the "JD is on a bender," and not even the last part of the...that's it, okay? Everything else would have to be redacted.

Mr. Chew: [inaudible 04:55:29] 607 A7.

Judge Azcarate: I'm going to allow that, just that one part. That one part of...everything else gets redacted as far as her text, Ms. Dembrowski's text can come in, except you have to get rid of her identifying information as far as her phone number, okay?

Mr. Rottenborn: And just to be clear, so [inaudible 04:55:50]

Judge Azcarate: That's it.

Mr. Chew: Your Honor, for the record, [inaudible 04:55:52].

Judge Azcarate: Okay, I understand.

Mr. Chew: ...also speculation.

Judge Azcarate: Okay. All right. That's fine. Noted. Thank you.

Mr. Rottenborn: If you want to redact [inaudible 04:56:00] bender, not the last two words.

Judge Azcarate: That's exactly right, not the last two words, and not the sentence above it, and not any of the sentences below it or any of the other texts, but Ms. Dembrowski's texts come in, but you got to just take out her phone number for me. Okay? So if you can give me...you owe me that, and I'll allow the redacted one into evidence. And you can owe that to me tomorrow, okay? And you also owe me 214 tomorrow too, correct?

Mr. Rottenborn: Yes, Your Honor. On that one, can we redact the...if we only show the last two columns and we redact the personal identifiers, can we then show the other columns that correspond to the text?

Judge Azcarate: As long as the personal identifiers...was what the objection was. So if you could do that for just the four...

Mr. Rottenborn: Yes. Yes, Your Honor.

Judge Azcarate: ...and get rid of the others, okay? All right. All right. That's all I had. Yes, ma'am, you had something?

Ms. Bredehoff: May we approach?

Judge Azcarate: Okay.

