


Appendix 1 to Defendants' closing submissions

Time (local time in Los Angeles)	Event	Trial bundle reference	Comments
		H23.4A	

Friday 22 March 2013: Day 2 of 3 of filming "Happy" documentary

Time (local time in Los Angeles)	Event	Trial bundle reference	Comments
12:00	Crew call for filming "Happy"	11/152/P12	
12:03	Text from Nathan Holmes to AH: <i>On my way to get him .</i>	7/1(e)/H21A.17a	
12:37	Text from AH to Nathan Holmes: <i>Trying to wake him now</i>	7/1(e)/H21A.17a	
	Text from Nathan Holmes to AH: <i>Hahahaha ok, thank you</i>		
13:37		6/148(f)/F894.263a (with metadata)	
14:11 [?]	Texts from Stephen Deuters to JD: <i>This is incredible here! Tom playing thru Dogwood and now Blind Love. No cameras yet. Just letting Tom get comfy. Going to be amazing. Keith just got here too.</i> <i>Don't want to do it without you having spoken to them both first tho</i> <i>Tom has settled. He's comfortable.</i> <i>Keith is in studio now</i>	7/56(c)/H206.7 (screenshot showing date/time of texts as "Mar 22, 2013, 21:11")	Timestamp on screenshot cannot be accurate as by 21:11 filming had finished (see filming report at [11/152/P12]).

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	<i>Keith is rehearsing</i> <i>We are not shooting yet but could start any minute</i>		Therefore time zone converted from UTC+0 (London) to UTC-7 (Los Angeles).
14:44	First shot that day of filming "Happy"	11/152/P12	
Time unknown but post-14:44	Text from Stephen Deuters to JD: <i>We've started shooting so you know</i> Text from JD to Stephen Deuters: <i>GO GODDAMIT!!! I am but a fly on the wall!!! Com-mence!!! There is nothing I can add to whatever magic is already there!!! GO!!! You make whatever calls you need to make!!! I'm on my way...</i> Text from Stephen Deuters to JD: <i>Cool. We're getting it. It's amazing.</i>	7/56(c)/H206.8 (second page of screenshot showing date/time of texts as "Mar 22, 2013, 21:11")	Timestamp on screenshot cannot be accurate as by 21:11 filming had finished (see filming report at [11/152/P12]). Therefore time zone converted from UTC+0 (London) to UTC-7 (Los Angeles).
15:08	Texts from AH to Whitney Henriquez: <i>Let me know before you get here</i> <i>Johnny is over still and we're fighting</i> <i>So please done come in yet</i> <i>It's kinda nasty but winding down</i>	7/1(c)/H21A.12	
15:09	Text from AH to Whitney Henriquez: <i>Cool?</i>	7/1(c)/H21A.12	
15:10	Text from AH to Whitney Henriquez: <i>Um? Did u not get that text ?</i>	7/1(c)/H21A.12	
15:23	Text from Whitney Henriquez to AH: <i>Sorry I was driving couldn't read them</i>	7/1(c)/H21A.12	
16:18	Text from AH to Christi Debrowski: <i>I'm so sorry. I don't know what to do.</i>	7/1(f)/H21A.23	
16:48	Text from Christi Debrowski to AH: <i>Don't be sorry! I am not completely sure if what is going on or why but I don't love what I it is</i>	7/1(f)/H21A.23	
16:50	Text from Christi Debrowski to AH:	7/1(f)/H21A.23	

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	<i>It is sad and I am sorry you guys are going thru this. I am here if there is anything I can do!</i>		
16:57 – 17:27	Lunch break during filming of "Happy"	11/152/P12	
17:02	Text from Christi Debrowski to AH: <i>Please let me know if i can do anything!</i>	7/1(f)/H21A.23	
17:14	Text from AH to Christi Debrowski: <i>I don't know what you could do.... He's upset and there's nothing I can do to reason with him. He's another person when he's like this. he's fueled up on booze and coke. And he believes we are fighting. No one is fighting with him. He's just gone. And this is the 4th time this week. the only time we have kind of fight is when that combo is in action. it's been killing me lately. I don't know how to avoid the blow out. I can't reason with him or calm him down, I cant even avoid it. He finds something to jump on and then uses it as an excuse to dose himself up. Which is where he is now. Wasted. I feel terrible and responsible some now for mess. And I only want to see him happy. I just want to help. I just want to have him back- and for some reason I find myself in the middle of his spiral. I feel terrible. I don't know what to do.</i>	7/1(f)/H21A.23	
17:16	Text from AH to Paige Heard: <i>Dealing with Johnny's spiral. It's terrible mom. I don't know what to do</i>	7/1(b)/H21A.1	
17:19	Text from AH to Christi Debrowski: <i>Please know I'm trying (and have been trying) to get him to feel like leaving. To film. He won't</i>	7/1(f)/H21A.23	
17:20	Text from Paige Heard to AH: <i>Get away - go somewhere else. Tell him you love him totally and this is the only way to protect that love. Come home, go to a motel, anywhere that's safe until it passes. You have to remove yourself from that spiral - not his love but please leave. Say I have an emergency if you need to. Please</i>	7/1(b)/H21A.1	
17:21	Text from Christi Debrowski: <i>I think with anyone in that place confrontation unfortunately doesn't help and sometimes conversations can seem like confrontations.</i>	7/1(f)/H21A.23	
17:23	Text from Christi Debrowski to AH:	7/1(f)/H21A.24	

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	<i>Disagreeing, reasoning, nudging all can seem like confrontations. I am not sure of the volume or when some is likely to wear off?</i>		
	Text from Paige Heard to AH: <i>You cannot reach him logically at this juncture (his logic) as it does not exist. What can I do? Can I call with an emergency?</i>	7/1(b)/H21A.1	
17:31	Text from Paige Heard to AH: <i>I am so very sorry but you have to change something or what happened last time is inevitable. I know you hate to lie and take things head-on but not right now. Please keep in touch</i>	7/1(b)/H21A.1	
17:38	Text from Paige Heard to AH: <i>Does he have any "good" friends?</i>	7/1(b)/H21A.1	
17:52	Text from Paige Heard to AH: <i>Go to Maui - marks there for the spring / summer. He won't ask questions</i>	7/1(b)/H21A.1	
17:56	Text from AH to Nathan Holmes: <i>Success ! He's coming down</i>	7/1(e)/H21A.18	
17:57	Text from AH to Nathan Holmes: <i>You guys here?</i>	7/1(e)/H21A.18	
	Text from Nathan Holmes to AH: <i>Back</i>		
17:58	Text from AH to Christi Debrowski: <i>Not sure how much he needs to drink for it to not wear off. I finally managed to get him to calm down. I agreed to come with him - its the only way he'd get up and agree to leave . Hopefully he'll be ok</i>	7/1(f)/H21A.24	
	Text from AH to Nathan Holmes: <i>Coming in 2</i>	7/1(e)/H21A.18	
18:01	Text from Christi Debrowski to AH: <i>Xoxo</i>	7/1(f)/H21A.24	
	Text from Christi Debrowski to AH: <i>I am going to 80 now. So far all is good there. I just want to make sure personally and I will be there and head back to OFC when I know all good</i>	7/1(f)/H21A.24	
	Text from Nathan Holmes to AH: <i>The woman downstairs just blocked us in and went in the apartment</i>	7/1(e)/H21A.18	
	Text from Nathan Holmes to AH: <i>Bugger</i>	7/1(e)/H21A.18	
18:03	Text from Christi Debrowski to AH: <i>No need to rush him</i>	7/1(f)/H21A.24	
18:08	Text from Paige Heard to AH: <i>No judgement here i promise just keep me informed that you are okay. You are my world</i>	7/1(b)/H21A.1	

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18:09	Text from AH to Christi Debrowski: <i>Ok. He's slowly starting to getting</i>	7/1(f)/H21A.24	
18:10	Text from AH to Christi Debrowski: <i>*get moving</i>	7/1(f)/H21A.24 – H21A.25	
	Text from Christi Debrowski to AH: <i>Don't rush. Ya know.</i>		
	Text from Christi Debrowski to AH: <i>Ok. Xoxo</i>		
18:10	First shot of filming after lunch	11/152/P12	
19:01	Text from Christi Debrowski to AH: <i>Ok. All ok?</i>	7/1(f)/H21A.25	
	Text from AH to Christi Debrowski: <i>We're finally on the way.</i>	7/1(f)/H21A.25	
	Text from AH to Christian Carino: <i>Yay. Btw- JD fell off the wagon last night- hardcore. He's on hour 24 of a major binge - sis is here trying to help. Long story Trying to escape here soon though- and will head over to yours. Would it be ok if I brought sis,</i>	7/1(g)/H21A.27	
	Text from AH to Christian Carino: <i>?</i>	7/1(g)/H21A.27	
19:02	Text from AH to Christi Debrowski: <i>Well . Ok enough I guess.</i>	7/1(f)/H21A.25	
	Text from AH to Paige Heard: <i>He's nuts mom. Violent and crazy. I am heartbroken that THIS is who I love .</i>	7/1(b)/H21A.2	
19:03	Texts from Christi Debrowski to AH: <i>Was just hoping all calm for you guys.</i>	7/1(f)/H21A.25	
	<i>I understand.</i>		
19:08	Text from Christian Carino to AH: <i>Of course. If you need me to come there to help you I will in a split second. x</i>	7/1(g)/H21A.27	
~19:15	JD arrives at Sweetzer Avenue: camera screenshot of film recording featuring JD shows time of "19:15:04".	11/152/P18	
19:17	Texts from AH to Christian Carino: <i>Thanks</i>	7/1(g)/H21A.27	
	<i>Ill let you know</i>		
19:56	"Camera wrap": end of second day of filming <i>"Happy"</i>	11/152/P12	
20:05	Text from Raquel Pennington to AH: <i>What you doing tonight?</i>	7/1(d)/H21A.17	
20:14	Text from Paige Heard to AH: <i>You should' tell your dad and be honest. JD will listen best chance</i>	7/1(b)/H21A.2	
	Text from AH to Christian Carino: <i>I'm stuck here for the moment. I'm trying to wrangle myself free. Stay tuned</i>	7/1(g)/H21A.27	
20:21	Text from Christian Carino to AH:	7/1(g)/H21A.27	


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	<i>Ok. Selena just got here. xo</i>		
20:32	Text from AH to Christian Carino: <i>On the way</i>	7/1(g)/H21A.28	
20:33	Text from Christian Carino to AH: <i>Great</i>	7/1(g)/H21A.28	
20:37	Text from AH to Paige Heard: <i>I can't tell dad.</i>	7/1(b)/H21A.2	
20:39	Text from AH to Raquel Pennington: <i>Going to Christian Carinos house for a little dinner</i>	7/1(d)/H21A.17	
20:40	Text from AH to Raquel Pennington: <i>JD has been crazy. He's on a major bend and I am so fucking of the drama I can't even tell you. I feel really lonely and freaked out</i>	7/1(d)/H21A.17	
20:42	Text from AH to Paige Heard: <i>It's ok mom. He's not being violent with me. He's just even raging in general. And the crazy mood swings and binges are really difficult for me to handle</i>	7/1(b)/H21A.2	
20:44	Text from Christi Debrowski to AH: <i>You do NOT have to thank me!!!!</i> Text from Christi Debrowski to AH: <i>I am gonna tell him he has a key if he wants to go to your place right? Because you told him you were going?</i> Text from AH to Christi Debrowski: <i>I'm here for him when he needs me . Please make sure he knows that if he's asking / looking . Thanks for listening earlier. I adore you. Have a good night.</i>	7/1(f)/H21A.25	
20:46	Text from Christi Debrowski to AH: <i>We can get back to the good moments!!! Together. Xoxoxoxoxoxoxoxoxo</i>	7/1(f)/H21A.26	
	Text from Paige Heard to AH: <i>I'm here for you</i>	7/1(b)/H21A.2	
20:48	Text from AH to Christi Debrowski: <i>Yeah -I told him I was leaving and going home after I got some dinner. He knows he has a key.</i>	7/1(f)/H21A.26	
	Text from AH to Christi Debrowski: <i>You're the best</i>	7/1(f)/H21A.26	
	Text from AH to Paige Heard: <i>I feel really lost and lonely</i>	7/1(b)/H21A.2	
	Text from AH to Paige Heard: <i>He's a madman.</i>	7/1(b)/H21A.2	
20:49	Text from AH to Paige Heard: <i>I feel like I'm on a very fastening train that's about to explode but I don't want to jump off and leave my love behind . So I stay on the train. even though I know it's about to explode</i>	7/1(b)/H21A.2	

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20:50	Texts from Christi Debrowski to AH: <i>Perfect. Will remind him.</i> <i>Xoxoxoxo.</i>	7/1(f)/H21A.26	
20:56	Text from AH to Christian Carino: <i>Can i bring anything ?</i>	7/1(g)/H21A.28	
20:57	Text from AH to Christi Debrowski: <i>Will you please let me know if and when he's leaving there? Just so I know if he's coming over ? I doubt he'll be able to text me..</i>	7/1(f)/H21A.26	
20:58	Text from Christian Carino to AH: <i>Yourself.</i>	7/1(g)/H21A.28	
	Text from Christi Debrowski to AH: <i>If I am here I will make sure to text you. Either me or Nathan or Stephen will ok?</i>	7/1(f)/H21A.26	
	Text from Paige Heard to AH: <i>Relapse-he will probably go back on the wagon (hopefully soon) are you okay for tonight relatively speaking? Honestly? My heart is with you.</i>	7/1(b)/H21A.3	
21:03	Text from Christi Debrowski to AH: <i>Enjoy your dinner. Xo</i>	7/1(f)/H21A.26	
21:08	Text from AH to Christi Debrowski: <i>Perfect. Thanks</i>	7/1(f)/H21A.26	
21:09	Text from AH to Christian Carino: <i>Almost there</i>	7/1(g)/H21A.28	
	Text from Christian Carino to AH: <i>Cool</i>		
	Text from Christian Carino to AH: <i>What do u want to drink. I'll have it ready</i>		
21:11	Text from AH to Paige Heard: <i>No- my heart is broken. I'm ok physically. JD didn't hit me or anything last night. I told him that would be if he did and it worked last night. But I'm scared by what I see and who I see now. It's Dr Jekyll and mr Hyde -- on a binge .</i>	7/1(b)/H21A.3	
	Text from AH to Christian Carino: <i>Red!</i>	7/1(g)/H21A.28	
	Text from AH to Christian Carino: <i>Please</i>	7/1(g)/H21A.28	
	Text from Christian Carino to AH: <i>Done</i>	7/1(g)/H21A.28	
21:18	Text from Paige Heard to AH: <i>I've been up 20 hours and ill try not to doze off. My phone will be on my pillow. Do not hesitate to call repeatedly in case I doze off. I'm really really scared for you and acutely feel your pain and uncertainty. Please text or call me in the am irregardlessly</i>	7/1(b)/H21A.3	
21:56	Text from AH to Paige Heard:	7/1(b)/H21A.3	

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	<p><i>Why are u staying up? I'm ok</i></p> <p>Text from Nathan Holmes to AH: <i>Do you have your iPad is this it ?</i></p> 	7/1(e)/H21A.19	
22:12	<p>Texts from AH to Nathan Holmes: <i>That's it!</i></p> <p><i>Will you tell me when he's leaving?</i></p>	7/1(e)/H21A.19	
22:17	<p>Text from Nathan Holmes to AH: <i>Perfect.. I think he's going to stay up at 66 tonight , but I really don't know . I will hold on to your iPad and get it back to you tomorrow</i></p>	7/1(e)/H21A.19	
22:23	<p>Text from AH to Nathan Holmes: <i>Is he ? Will you ask him to call me?</i></p>	7/1(e)/H21A.19	
22:24	<p>Texts from Nathan Holmes to AH: <i>I don't know what he's doing .. I will keep you posted .. I think he's texting you now</i></p> <p><i>He's sat talking to Ruth</i></p>	7/1(e)/H21A.19 - .20	
22:34	<p>Text from AH to Nathan Holmes: <i>Ok</i></p> <p>Text from AH to Nathan Holmes: <i>Thanks</i></p> <p>Text from AH to Nathan Holmes: <i>See you later</i></p> <p>Text from Nathan Holmes to AH: <i>Yay x</i></p> <p>Text from Christian Carino to AH: <i>I love u</i></p>	7/1(e)/H21A.20 7/1(g)/H21A.29	
22:37	<p>Texts from AH to Christian Carino: <i>I love you.</i></p> <p><i>I can't tell you how much I appreciate you in my life. Please please don't worry about me . You're going to be one of the first to know if I need help. I promise</i></p>	7/1(g)/H21A.29	
22:38	<p>Text from AH to Christian Carino: <i>And thank you for the wine! Ha... I needed that ;)</i></p>	7/1(g)/H21A.29	
22:39	<p>Text from Christian Carino to AH: <i>I will jump in the car to come get you...or both of you. Just text. And I know you are meant to be with him. He can't love anyone else. It's in his eyes. Same with Kara. xo</i></p>	7/1(g)/H21A.29	
23:04	<p>Text from Christian Carino to AH: <i>You ok?</i></p>	7/1(g)/H21A.29	

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23:05	Text from AH to Christian Carino: <i>Yeah. All good. Ill let you know if it changes all the sudden (quite possible)</i>	7/1(g)/H21A.29	
23:06	Text from Christian Carino to AH: <i>K. Be safe...and happy. xo</i>	7/1(g)/H21A.29	
23:36	Text from Raquel Pennington to AH: <i>You do have a really difficult situation on your hands. You don't want to be the parental unit but I know it's hard to see someone spin so far off. Just remember you don't have to be around for it. You can take a dignified bail and see him in the morning when things are more normal hopefully.</i>	7/1(d)/H21A.17	
23:57	Texts from AH to Nathan Holmes: <i>Is he alright?</i> <i>Still upright ?</i>	7/1(e)/H21A.20	
23:58	Text from Nathan Holmes to AH: <i>He's a lot better than he was .. Still upright</i>	7/1(e)/H21A.20	
00:00	Text from AH to Nathan Holmes: <i>Ok. Good. Text me if u need to</i>	7/1(e)/H21A.20	



Saturday 23 March 2013: Day 3 of 3 of filming "Happy" documentary

00:02	Text from Nathan Holmes to AH: <i>Will do lovely .. Are you ok ?</i>	7/1(e)/H21A.21	
	Text from AH to Nathan Holmes: <i>I guess. Sad. But ok. Thanks for asking . Hope you're ok too...? See you tomorrow .</i>	7/1(e)/H21A.21	
00:03	Text from Christian Carino to AH: <i>Everything ok?</i>	7/1(g)/H21A.30	
00:06	Text from Nathan Holmes to AH: <i>It might be good if he stays here tonight, just to give you a peaceful night and also let him sober up .. Hopefully we can get him into work mode tomorrow and you can come up !! Bring a hot single friend with you .. Or your sister !! Hahahaha I just want everyone to be happy .</i>	7/1(e)/H21A.21	
00:10	Text from Nathan Holmes to AH: <i>He won't drink at work because he thinks no one knows he's drinking again</i>	7/1(e)/H21A.21	
00:11	Text from AH to Nathan Holmes: <i>Yeah- I think so too. Is he still hanging out ? Does he seem like he'll stay settled ?</i>	7/1(e)/H21A.21	
00:12	Text from Nathan Holmes to AH: <i>He's sat in 66 with ruth, Calvin and Bruce .. I'm hiding in the kitchen</i>	7/1(e)/H21A.21	
00:13	Texts from AH to Nathan Holmes: <i>Ok . Good. I hope he wants to stay there</i>	7/1(e)/H21A.21	

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	<i>Ill text him I'm falling out soon. Maybe that'll help</i>		
00:14	Text from Nathan Holmes to AH: <i>He should stay , I will make sure he does .. Get a good nights sleep</i>	7/1(e)/H21A.22	
00:53	Text from Paige Heard to AH: <i>For you KK</i>	7/1(b)/H21A.3	
09:40	Text from Paige Heard to AH: <i>Are things better? Did he sleep?</i>	7/1(b)/H21A.4	
09:52	Text from Paige Heard to AH: <i>I'm sorry I overreacted last night. I promise ill do better</i>	7/1(b)/H21A.4	
11:27	Text from AH to Paige Heard: <i>It's ok mom</i>	7/1(b)/H21A.4	
11:30	Text from Paige Heard to AH: <i>Are you ok?</i>	7/1(b)/H21A.4	
11:41	Text from AH to Paige Heard: <i>Not sure. It's been kinda crazy</i>	7/1(b)/H21A.4	
11:42	Text from Paige Heard to AH: <i>This has to be a nightmare for you. Uncontrolled</i>	7/1(b)/H21A.4	
	Text from AH to Paige Heard: <i>He makes dad look like a saint when he falls off the wagon</i>		
	Text from AH to Paige Heard: <i>Goddamn</i>		
11:46	Text from Paige Heard to AH: <i>It probably won't last - when your dad comes out there he will have a talk with him as he is sober (so to speak). Just remember to stay out of his way when he hits that critical hairpin point. I love you so much</i>	7/1(b)/H21A.5	
11:48	Text from Paige Heard to AH: <i>Is he even aware of how bad it's gotten?</i>	7/1(b)/H21A.5	
11:52	Text from Paige Heard to AH: <i>It's the last thing on earth you would have walked into. Where is Steve?</i>	7/1(b)/H21A.5	
12:09	Text from AH to Paige Heard: <i>He told his friend yesterday that he was "really lost" but of course when I try to suggest that's a part of the fighting etc - he claims he's totally not affected what so ever by it!</i>	7/1(b)/H21A.5	
	Text from Paige Heard to AH: <i>Wow that's delusional</i>		
12:12	Text from Paige Heard to AH: <i>Can he attribute it to anything else?</i>	7/1(b)/H21A.5	
12:13	Text from Paige Heard to AH: <i>You are in his house with him and his demon, no?</i>	7/1(b)/H21A.5	
12:14	Texts from AH to Paige Heard: <i>He's been at my House for weeks now</i>	7/1(b)/H21A.5 - .6	
	<i>Every night</i>		
	<i>Last night I locked the deadbolts ("on accident") and fell asleep</i>		

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	<i>So it was my first peaceful night</i>		
12:16	Text from Paige Heard to AH: <i>Good move (dead bolts). This is so bad....</i>	7/1(b)/H21A.6	
12:20	Text from AH to Paige Heard: <i>You have no idea</i>	7/1(b)/H21A.6	
12:26	Text from Paige Heard to AH: <i>Your dad or I would fly out today if it would help. It sounds like you need someone now. I can charge it so you don't need to pay and no one needs to know.</i>	7/1(b)/H21A.6	
12:35	Text from Paige Heard to AH: <i>I am guessing that he "knows" he's fucking up and that's fueling his disgust and he drinks more. And you are trapped in and by that cycle. Amber, honey, I am so very sorry this is happening to you. You brought NONE of this on</i>	7/1(b)/H21A.6	
12:39	Text from Paige Heard to AH: <i>Do you have any idea what snapped him out of this before?</i>	7/1(b)/H21A.6	
13:00	Call time on film set of "Happy" documentary	11/154/P29; 11/153/P20	
13:16	Texts from AH to Paige Heard: <i>No - I don't</i> <i>I don't have an idea what to do</i>	7/1(b)/H21A.6 - .7	
13:18	Text from Paige Heard to AH: <i>Are the kids still in town? Surely he would straighten up before seeing them. Once out of this cycle you'll have a different JD</i>	7/1(b)/H21A.7	
13:22		6/148/F894.001A (with metadata)	
	Text from AH to Paige Heard: <i>From 2 weeks ago today</i> 	7/1(b)/H21A.7	
13:27	Text from Paige Heard to AH: <i>Oh my baby.</i>	7/1(b)/H21A.7	
13:28	Texts from Paige Heard to AH: <i>Has he stayed this way since then!</i>	7/1(b)/H21A.7	

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	?		
13:29	Text from Paige Heard to AH: <i>What are his body guards doing? You need your own</i>	7/1(b)/H21A.8	
13:30	Text from Paige Heard to AH: <i>Can you leave at all?</i>	7/1(b)/H21A.8	
13:45	Text from Paige Heard to AH: <i>Can your dad text JD just to say hi? He doesn't know anything but I could suggest that he text him, since they are such good bros. he'd love to</i>	7/1(b)/H21A.8	
14:02	Text from Paige Heard to AH: <i>He texted him on his own</i>	7/1(b)/H21A.8	
14:04	Text from Paige Heard to AH: <i>I know that this isn't the real JD but I am seriously worried about your safety</i>	7/1(b)/H21A.8	
15:16	First shot that day of filming "Happy"	11/153/P20	
15:19	Text from Paige Heard to AH: <i>He texted JD asking him to check on you. Let me know if there's any reaction. At this point I'm Afraid anything might set him off. Your dad knows nothing or the text would be very different. He was just texting his "bro".</i>	7/1(b)/H21A.8	
15:29	Text from Paige Heard to AH: <i>I'm making a fresh blackberry cobbler - wish you were here</i>	7/1(b)/H21A.8	
15:40	Text from AH to Paige Heard: <i>Why and what did he text him?</i>	7/1(b)/H21A.8	
15:43	Text from Paige Heard to AH: <i>He ran to the store. So I'm not exactly sure. Ill tell you as soon as he gets back. Just Brother to brother bs since they are compadres</i>	7/1(b)/H21A.9	
15:45	Text from Paige Heard to AH: <i>He knows nothing of what's going on.</i>	7/1(b)/H21A.9	
15:51	Text from Paige Heard to AH: <i>He said earlier that you hadn't called him lately.</i> Text from AH to Paige Heard: <i>Why would he ask him to check on me though?</i>	7/1(b)/H21A.9	
15:53	Text from AH to Paige Heard: <i>Dad ?</i> Text from Paige Heard to AH: <i>I think Kate called him and he wanted it to be you</i> Text from Paige Heard to AH: <i>I didn't know he asked him to check on you or why really. Yes your dad wants you to call him</i>	7/1(b)/H21A.9	
15:55	Text from Paige Heard to AH: <i>He probably wants money</i>	7/1(b)/H21A.9	
16:10	Text from AH to Paige Heard: <i>Ill call him</i>	7/1(b)/H21A.9	
16:36	Text from Paige Heard to AH: <i>I'm sure sorry if that caused problems. I can only imagine the volatility of your situation. Will you be safe tonight?</i>	7/1(b)/H21A.10	
17:02	Text from AH to Paige Heard:	7/1(b)/H21A.10	

Appendix 1 to Defendants' closing submissions

	<i>Yes! I'm safe mom</i>		
17:04	Text from Paige Heard to AH: KK	7/1(b)/H21A.10	

Other relevant documents:

- Photograph of Amber Heard and Ian McLagan. On 5 July 2020 the Claimant disclosed this to the Defendants with a metadata date/time of "April 7, 2013 11:02PM" [9/86(e)(i)/J48.16] but on 21 July 2020 Ms Laws QC put to Ms Heard in cross-examination that this photograph was in fact taken on 23 March 2020. This assertion was made on the basis of the travel documents of Ian McLagan [11/ Tabs 148 and 149]: see Transcript, Day 11, pages 1810 – 1817.
- Ms Heard's evidence was that "*I do not know when it [this photograph] was taken*" but her bottom lip in this photograph looked swollen to her (Day 11, pages 1810, lines 10-17 and pages 1817-18).
- Ms Henriquez' evidence was that in this photograph "*I see makeup and a split lip.*" (Day 13, page 2156, lines 19-20).

