


**Painting incident: 22 March 2013, Los Angeles**  
 Defendants' chronology of relevant documentary evidence


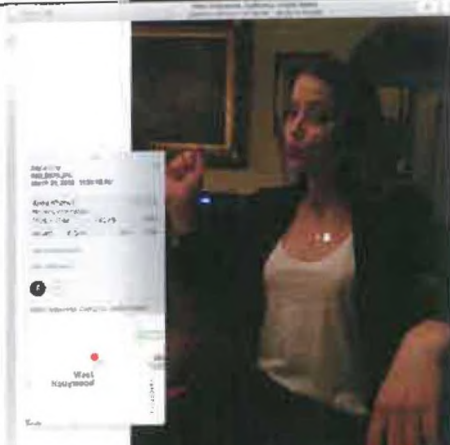

**Wednesday 20 March 2013**

Time (local time in Los Angeles)	Event	Trial bundle reference	Comments
12:48 – 19:13	<p>Emails between JD and Jane Rose (producer of "Happy" documentary) about meeting and setting up for filming the documentary. JD writes to Jane Rose:</p> <p><i>Also, am with my girl, Amber... You will love her!!! Is it alright to bring her around with me? She's not a pain in the ass, like the French ex albatross... No comparison.</i></p> <p><i>Whatever's alright is fine... She's just on my arm and a killer broad... But, would never overstep any boundaries, as it is Maestro's sanctuary...</i></p>	8/63(a)/I1.1 – 1.3	




**Thursday 21 March 2013: Day 1 of 3 of filming "Happy" documentary**

Time (local time in Los Angeles)	Event	Trial bundle reference	Comments
12:30	Crew call for first day of filming "Happy"	11/151/P4	
21:10	"Camera wrap": end of first day of filming "Happy"	11/151/P4	
23:22		9/94(a)/J10.2 (with metadata)	

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Time (local time in Los Angeles)	Event	Trial bundle reference	Comments
23:30		9/94(a)/J10.3 (with metadata)	
23:31		9/ 94(a)/J10.4 (with metadata)	
23:51		9/94(a)/J10.5 (with metadata)	
<i>Time unknown</i>	Additional pictures taken on the evening of 21 March 2013:	9/94(a)/J10.1	

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Time (local time in Los Angeles)	Event	Trial bundle reference	Comments
			
		11/165(b)/P57.3	
		11/165(b)/P57.7	
<p><i>Late in the evening of 21 March 2013 or early hours of 22 March 2013 (exact time unknown)</i></p>	<p>The painting incident started after the meeting with Keith Richards, and after the above photographs were taken.</p> <p>During the course of the incident, the Claimant attempted to set fire to <u>this</u> canvas painting<sup>1</sup>:</p>	<p>Image of this painting contained is in text messages between JD and Whitney Henriquez dated 31 May 2013:</p> <p>7/2(b)(i)(A)/</p>	

<sup>1</sup> It is not the Defendants' case that the Claimant attempted to set fire to the glass-framed "Tasya van Pee" painting shown in text messages between JD and Whitney Henriquez dated 11 February 2014 at [7/2(b)(ii)/H23.4B-H23.4D].

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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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Time (local time in Los Angeles)	Event	Trial bundle reference	Comments
	<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	
<i>Time unknown but post-14:44</i>	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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Time (local time in Los Angeles)	Event	Trial bundle reference	Comments
	<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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Time (local time in Los Angeles)	Event	Trial bundle reference	Comments
	<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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Time (local time in Los Angeles)	Event	Trial bundle reference	Comments
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>	7/1(f)/H21A.25	
	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>		
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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Time (local time in Los Angeles)	Event	Trial bundle reference	Comments
	<p><i>Why are u staying up? I'm ok</i></p> <p>Text from Nathan Holmes to AH: <i>Do you have your I pador 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	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 I pad and get it back to you tomorrow</i>	7/1(e)/H21A.19	
22:23	Text from AH to Nathan Holmes: <i>Is he ? Will you ask him to call me?</i>	7/1(e)/H21A.19	
22:24	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> <i>He's sat talking to ruth</i>	7/1(e)/H21A.19 - .20	
22:34	Text from AH to Nathan Holmes: <i>Ok</i>	7/1(e)/H21A.20	
	Text from AH to Nathan Holmes: <i>Thanks</i>		
	Text from AH to Nathan Holmes: <i>See you later</i>		
	Text from Nathan Holmes to AH: <i>Yay x</i>		
	Text from Christian Carino to AH: <i>I love u</i>	7/1(g)/H21A.29	
22:37	Texts from AH to Christian Carino: <i>I love you.</i> <i>I can't tell you how much I appreciate you jn 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>	7/1(g)/H21A.29	
22:38	Text from AH to Christian Carino: <i>And thank you for the wine! Ha... I needed that ;)</i>	7/1(g)/H21A.29	
22:39	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>	7/1(g)/H21A.29	
23:04	Text from Christian Carino to AH: <i>You ok?</i>	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>		

Appendix 1 to Defendants' closing submissions

	<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	

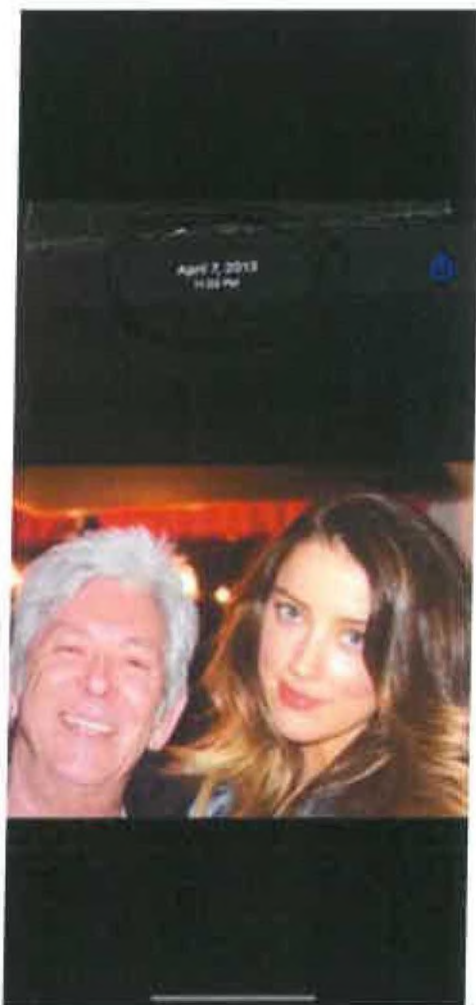
Appendix 1 to Defendants' closing submissions

	?		
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	

	<i>Yes! I'm safe mom</i>		
17:04	Text from Paige Heard to AH: <i>KK</i>	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).





**Australia chronology: 6<sup>th</sup> – 9th March 2015**  
Defendants' chronology of relevant documentary evidence

<b>Date/ Time (local<sup>1</sup>)</b>	<b>Event</b>	<b>Trial Bundle ref</b>	<b>Comments / original timestamps (pre-conversion to local time)</b>
13 February 2015	Claimant arrives in Australia	4/137/F842	
25 February 2015 to 3 March 2015	'Australia drugs texts' between JD and Nathan Holmes	File 10; Tab 147(a), page 0264 to page 0271  Additional texts in: File 7, Tab 5(b), pages H30.2- H30.5: text numbers 80039-80257 and 80436	
<b>Friday 6 March 2015</b>			
13:22	JD texts Stephen Deuters and Christi: Honestly... I will not again be doing anything that involves the discussion of furthering my embarrassment of having whored for all these fucking wasted piece of shit nothing years on characters that I so ignorantly started to think of as my legacy... Every cuntinng fight!!!	File 6; Tab 119, F697.58	3/6/2015 3:22:31 AM(UTC+0)

<sup>1</sup> Gold Coast of Australia: UTC+10.


	every fucking time!!! I held my ugliness and rage deeper down and get n check, when there was still room in my head to do such a thing !!!!!!!!!!!!!		
14:22	<p>Stephen Deuters texts JD and Christi:  When I was a kid, I loved my writers, my directors, my musicians... But there was only ONE actor I loved. ONE actor whose films I would go and see every single one of, at the cinema. And I was not alone. Nor am I now. You are a MAVERICK. An ARTIST. A bona-fide FUCKING LEGEND. One of the ALL TIME GREATS...ALL TIME!!! You are LOVED out there in the world and all anybody wants to see on that screen is the Johnny Depp they know and LOVE. That said, you DESERVE some time off - take a break, look after yourself for a while - then we can discuss other stuff. But, just for now, you need to be far less harsh on yourself and remember and salute all that you have accomplished in life. No one has achieved what you have managed to achieve, from critical hero to box office juggernaut, all the while managing to retain the people's touch. A phenomenal, unprecedented, never to be repeated feat!!! You've inspired MULTIPLE generations of young artists, from actors to musicians, to wannabe writers... In fact, similar to Keith in that respect, you've transcended all genres - you're the one who everybody loves, been accepted by every niche. So, as I've told you before, to call it an honor to work for you, doesn't do my feelings on the topic any justice whatsoever. But, safe to say, I wouldn't work for anyone else. You're the reason I'm in this business, and by fuck, does this business need you.</p>	File 6; Tab 119, F697.58	3/6/2015 4:22:24 AM(UTC+0)
14:41	<p>JD texts Stephen Deuters and Christi:  You are a kind man... The sweetest and... You break my heart... Thank you for saying what you said and for feeling what you felt...  I am nothing more thAn just another nobody who did a whole bunch of nothing... and crawled out to play their games...  MY GOAL IS TO  NNNNNNNNNN  OOOOOOOOOO  TTTTTTTTTTTTTT be remembered!!!  I WANT EVERYTHING ABOUT ME DEAD AND GONE...  I WISH TO BE FORGOTTEN!!!</p>	File 6; Tab 119, F697.59	3/6/2015 4:41:18 AM(UTC+0)
14:43	<p>JD texts Stephen Deuters and Christi:  Truly. Not a blip... Forget... Because it's all shit. I hate I hate I hate</p>	File 6; Tab 119, F697.59	3/6/2015 4:43:43 AM(UTC+0)

15:13	Stephen Deuters texts JD and Christi: Well that breaks my heart, but I am listening, I hear you... And somehow we need to figure this out, because we have to... I love you to bits, as do so many others, both near and far... And so we will figure this out... Everything passes in time X	File 6; Tab 119, F697.59	3/6/2015 5:13:36 AM(UTC+0)
<b>Saturday 7 March 2015</b>			
Time unknown	Medical notes for AH:  3/7/15: Ct notifies RN via text of increasing anxiety. Reports emotional lability. RN encourages client to use distraction and coping skills taught in past. Ct reports self-admin additional Seroquel 12.5mg at 0430 due to insomnia. Ct able to sleep again at 0500 until 0930. RN encourages ct to remain in contact to assist in decreasing anxiety and increase emotional stabilizaton.	File 9, Tab 132, page K205	
15:12 [?] [Time/date unclear]	Stephen Deuters texts Christi: Hi C. Not sure how much you are aware of right now, but I am at the house with Kipper and Debbie, who are speaking with JD and Amber respectively, separately. Obviously, things have not calmed over the last day or so - apparently there he has been making calls to LA but I am not aware of the particulars there as well as fighting between the two here - so Kipper is now talking to JD, hoping to get thru to him, and explain to him that 'this period' needs to end now before we get into real trouble. I'll keep you posted on the outcome. The good news thus far is that JD did not cancel this mtg and that he is engaging in conversation. We'll see how that goes and will do whatever ever we need to do. I also heard that Mom was in hospital. Sorry to hear that. I hope she's ok. X	File 6; Tab 119, F697.59	3/7/2015 5:12:52 AM(UTC+0)  There was some confusion about the timing of this message. Mr Deuters stated in oral evidence that he sent this message after he was aware of the Claimant having injured his finger, and that he did not know when this message was sent: <b>Day 5, Page 820, line 24 – Page 821, line 12</b>
18:17 [?] [Time/date unclear]	Stephen Deuters texts Christi: well conversations seem to be going well...JD is agreeing to all that Kipper is requesting he do, in order to turn himself around...of course we've heard that before, so we'll see... they are now sat with Amber as well, but look to be wrapping up soon...more shortly	File 6; Tab 119, F697.60	3/7/2015 8:17:04 AM(UTC+0)  See comment in respect of text message directly above
21:17	JD texts Nathan Holmes: Also... May I be ecstatic again??? Helps... Color me deceased	File 7, Tab 5(b), page H30.5	Timestamp: 3/7/2015 3:17:32 AM(UTC-8)

21:24	Nathan Holmes texts JD: This is what I have for the HBO thingy , but it doesn't really make sense to me , maybe Amber knows how to set it up ? HBO to go HBOtogoamd kmd2000k@gmail.com hbotogo.com/activate put in device code directv cd@infinitum-nihil.com tontosgiantnuts	File 10; Tab 147(a), page 0271	Timestamp: 3/7/2015 3:24:48 AM(UTC-8)
<b>Sunday 8 March 2015</b>			
02:59	Paige Heard texts JD: Hey my son-out-law, I've been thinking about you way down under. Please know no amount of miles or number of continents will separate you from my love. I am so honored and proud that you are my son. I wake up every single morning and smile. Please keep your lovely bride from those giant insects. She will freak. Even big bugs won't keep her away from you, but she may be on the ceiling- lol	File 7, Tab 5(b), pages H30.5	3/7/2015 4:59:44 PM(UTC+0)
03:03	Paige Heard texts JD: I've never seen her (via text) as happy and in-love. I hope you are too.... Your mean ole MOL (mother-out-law)	File 7, Tab 5(b), pages H30.6	3/7/2015 5:03:20 PM(UTC+0)
03:16	Paige Heard texts JD: You've added a whole new chamber to my heart.	File 7, Tab 5(b), pages H30.6	3/7/2015 5:16:01 PM(UTC+0)
04:54	JD texts David Heard: My dear brother... Worst decision that either one have	File 10; Tab 147(a), page O115	Timestamp: 3/7/2015 10:54:54 AM(UTC-8)
04:55	JD texts David Heard: Made...	File 10; Tab 147(a), page O115	Timestamp: 3/7/2015 10:55:05 AM(UTC-8)

04:55	JD texts David Heard: PLEASE DON'T TELL PAIGE!!!	File 10; Tab 147(a), page O115	Timestamp: 3/7/2015 10:55:24 AM(UTC-8)
04:56	David Heard texts JD: Man what is going on what are you talking about	File 10; Tab 147(a), page O115	Timestamp: 3/7/2015 10:56:00 AM(UTC-8)
04:56	David Heard texts JD: Talk to me Johnny are you and amber fighting are you talking about my sister I don't know	File 10; Tab 147(a), page O115	Timestamp: 3/7/2015 10:56:53 AM(UTC-8)
09:49	Dr Kipper texts JD: Hope your evening was a bit more comfortable. I enjoyed our time yesterday and sorry you are struggling. I know we can make you feel better. I will come by at 3 today for a visit.	File 10; Tab 147(a), page O142	Timestamp: 3/7/2015 3:49:20 PM(UTC-8)
11:00	JD texts Dr Kipper: Hi... Fucked, man... Had another one... I just cannot live like this... She is as full of shit as a Christmas Goose!!! I'm done. NO MORE...!!! The constant insults, the demeaning, belittling, most heartbreaking spew that is only released from a malicious, evil and vindictive cunt!!!! But, you know what... ?? FAR MORE hurtful than her venomous and degrading, endless "educational" ranting...??? Is her hideously and purposely hurtful tirades and her goddam shocking treatment of the man she was meant to love, above all... Here's the real deal, mate... Her obsession with herself..?? Is far more important... She is SO FUCKIN' AMBITIOUS!!! She's so desperate for success and fame... That's probably why I was acquired, mate...!! Although, she has HAMMERED me with what a sad old man, has been I am...	File 7, Tab 5(b), page H30.6	Timestamp: 3/7/2015 5:00:53 PM(UTC-8)

	<p>Cowan has done me the most cruel of favors...  I'm so very sad...  I cut the top of my middle finger off... What should I do!?? Except, of course, go to a hospital...  I'm so embarrassed for jumping into anything with her...  <b>FUCK THE WORLD!!!</b>  JD</p>		
11:05	<p>JD texts Nathan Holmes:  Need more whitey stuff ASAP, brotherman... And the e business!!! Please... I'm in bad, bad shape... Say <b>NOTHING</b> to <b>NOBODY!!!!</b></p>	File 7, Tab 5(b), page H30.6	Timestamp: 3/7/2015 5:05:43 PM(UTC-8)
11:10	<p>Nathan Holmes texts JD:  Okie dokie</p>	File 7, Tab 5(b), page H30.7	Timestamp: 3/7/2015 5:10:09 PM(UTC-8)
11:21	<p>Dr Kipper to JD:  Call me</p>	File 7, Tab 5(b), page H30.7	Timestamp: 3/7/2015 5:21:04 PM(UTC-8)
11:30	<p>Dr Kipper notes</p> <p>1130 – MD received a text msg from client that he had been arguing with wife and that he had cut his finger. According to patient his assistant and security were on there way to pick him up.</p> <p>New Med Order</p> <p>Augmentin 875 mg BID x10D</p>	File 4, Tab 137, page F844	Notes recorded as "3/7/15" but likely should be dated <u>8<sup>th</sup></u> March 2015
11:37	<p>Malcolm Connelly texts JD:  Be there in 30 mins JD!</p>	File 7, Tab 5(b), page H30.7	3/8/2015 1:37:32 AM(UTC+0)
11:57	<p>Malcolm Connelly texts JD:  I'll be outside.</p>	File 7, Tab 5(b), page H30.7	3/8/2015 1:57:00 AM(UTC+0)

12:08	Malcolm Connelly texts JD: 20 mins! Stay calm mate!	File 7, Tab 5(b), page H30.7	3/8/2015 2:08:10 AM(UTC+0)
12:10	Malcolm Connelly texts JD: 15 mins	File 7, Tab 5(b), page H30.7	3/8/2015 2:10:56 AM(UTC+0)
12:14	Malcolm Connelly texts JD: 10 mins	File 7, Tab 5(b), page H30.7	3/8/2015 2:14:49 AM(UTC+0)
12:19	Malcolm Connelly texts JD: 4mins	File 7, Tab 5(b), page H30.7	3/8/2015 2:19:11 AM(UTC+0)
12:57		File 9, tab 87(h)(ii), p. J1.4B	
<i>Time unknown</i>	'20150308 115955' Australia audio file together with transcripts: - Claimant's transcript: File 5, Tab 156(a) - Defendants' transcript: File 5, Tabs 156(b)  Audio file: "F156. 20150308 115955 Australia audio file (Exhibit 9 of Amber Heard's Divorce Exhibits)"	File 5, tabs 156(a) and (b)	
<i>Time unknown</i>	'20150308 213330' Australia audio file agreed transcript	File 5, tab 157	

	Audio file: "F157. 20150308 213330 Australia audio file (Exhibit 9 of Amber Heard's Divorce Exhibits)"		
13:00	Dr Kipper notes  1300 – Patient was having a hard time leaving the house so security suggested the MD and RN go to house to see patient. Upon arrival to house patient was sitting in car ready to leave. MD assessed patients finger and will spend more time with patient at the location he is being moved to.	File 4, Tab 137, page F844	Recorded as "3/7/15" but likely should be dated 8 <sup>th</sup> March 2015
15:30	Dr Kipper notes  1530 – MD cleaned and dressed wound to R middle finger. RN, MD, security and assistant will be taking patient to ER to have finger wound properly cleansed and treated. Patient given Toradol 60 mg IM ROUQ and Augmentin 875mg PO.	File 4, Tab 137, page F844	Notes recorded as "3/7/15" but likely should be dated 8 <sup>th</sup> March 2015
16:20	JD admitted to Emergency Department at Gold Coast University Hospital and seen by Dr Sawhney. Dr Grant's discharge summary records that JD presented on "8 MAR 2015 at 16:20". Notes record that "He will be followed up tomorrow by Dr Sawhney and surgical options discussed."	File 4, Tab 133, page F761	
17:25	Gina Deuters texts Stephen Deuters: Any word from camp Amber?	File 6, Tab 119, page F607.60	3/8/2015 7:25:52 AM(UTC+0)
21:30	According to Dr Kipper's notes (see below), JD returns from the Emergency Room at 21:30		
22:05 [?]	Dr Sawhney emails Dr Kipper medical notes from treating JD	File 4, Tab 132, page F759-760	"Sunday, March 8, 2015 4:05AM" Time zone unclear



22:41	Christi texts Stephen Deuters: Oh wow! Poor thing!!! Much more bandaged than I thought...makes me so sad. It will be good for him to rest tomorrow...I hope that is what tomorrow is for him. Not sure if he is ok to work for a bit. Glad he has a few days but maybe not enough. If he feels ok to then Capt Jack may need an "injury"	File 6 , Tab 119, page F607.60	3/8/2015 12:41:14 PM(UTC+0)
22:58	Stephen Deuters to Christi: Bandage makes it look worse - half of it will probably come off tmrw or Tuesday. I'll speak to Joe and Kenny to let them know that we will have to figure something house hand-wise altho we did spk about Cpt Jack having an injury, so it could be something... We'll have a brain storm on it. Hopefully Kipper will put him to sleep tonight and he can just rest for a few days. I really hope amber gets that flight!!!	File 6 , Tab 119, page F607.60	3/8/2015 12:58:02 PM(UTC+0)
23:03	JD texts Nathan Holmes: Hey... Can you come here???		3/8/2015 1:03:07 PM(UTC+0)
23:07	Nathan Holmes texts JD: Yes , be there very soon .		3/8/2015 1:07:12 PM(UTC+0)
23:30	Dr Kipper notes  1130 – Patient and staff returned from ER at 2130. Patient was seen by ER MD and hand specialists. Wound was cleaned and dressed and patient was given a tetanus shot L deltoid and given IV antibiotics. Discharge instructions were for patient to see hand specialists tomorrow to discuss possible treatment options for finger. Upon arrival back to apartment patient discussed feeling of anger and sadness about relationship. Patient was encouraged to stay away from wife as the relationship is toxic. Patient expressed verbal understanding and why they needed to separate. MD offered patient Valium 10mg IM to help with his anxiety and anger but patient refused. RN and MD suggested that patient take his bedtime meds and go to sleep and patient refused. Patient was talking about wanting to	File 4, Tab 137, page F844 - 845	Notes recorded as "3/7/15" but likely should be dated 8 <sup>th</sup> March 2015
	drink alcohol but did not obtain any.	File 4, Tab 137, page F845	

Time unknown	<p>Medical notes for AH:</p> <p>3/8/15: RN received report from Debbie, RN. Client will be returning to Los Angeles on 3/9/15 accompanied by house manager Ben. RN plans to meet client upon arrival. Ct is in touch with RN via text throughout day expressing feelings of moderate to severe anxiety. Ct compliant with medication including Xanax 0.5mg now dose at 2015 (PST) with prompting from RN. Deep breathing and relaxation techniques reviewed with ct. Ct states medication and breathing effective in reducing anxiety.</p>	File 9, Tab 132, page K205	
Time unknown and this may be 9 March	<p>Dr Connell Cowan medical notes for AH: [XXX] [Call?]: 3.8.15 Amber Heard</p> <p>Very difficult maintaining continuity of care with Amber. Her travel schedule has prevented any meaningful communication. Amber is with JD in Australia where he is working. Difficult to match times but not impossible – concerned that she hasn't made more effort to make this happen. Have exchanged a number of texts. They are fighting – relationship volatile and destructive to any sense of growing trust. Her coping skills seem minimal – talks about feeling lost and not knowing what to do. Trying to arrange an actual conversation to evaluate. Big event that turned angry – trying to piece together the specifics. They are both volatile and she doesn't back down when confronted. Understand he badly injured his hand.</p>	File 9, Tab 133, page K255	This note is dated "3.8.15" but Dr Kipper's notes for AH (below) state that AH attended 2 hour psychotherapy session on 9 March 2015
<b>Monday 9 March 2015</b>			
00:15	<p>JD texts Christi: Hi... Cancel the postnuptial!!! Most likely, we should investigate an annulment... Beyond that... I'd really love to speak for 10 minutes...??? Whenever you get a chance... XXX!!!!</p>	File 6 ,Tab 119, page F607.60	3/8/2015 2:15:52 PM(UTC+0)

Appendix 2 to Defendants' closing submissions

01:45	<p>Dr Kipper notes</p> <p>3/8/15 –</p> <p>0145 –</p> <p>Patient has been on phone with his security guard that is staying with his wife at their rented house. Patient is discussing wanting to go home to LA tomorrow and rehashing night. Patient's personal security guard came to stay with patient, RN will be next door and instructed security to call during the night if needed.</p>	File 4, Tab 137, page F845	Notes recorded as "3/8/15" but likely should be dated <u>9<sup>th</sup></u> March 2015
05:02	<p>JD texts Christi: Fucked up my finger pretty nasty... Also, Can you see if we can get hold of a Pvt. Plane for tomorrow ?? I'm gagging to be back!!!!</p>	File 6 ,Tab 119, page F607.60	3/8/2015 7:02:27 PM(UTC+0)
11:04	<p>Christi texts Stephen Deuters: Just make sure you say you aren't sure how he hurt his hand</p>	File 6 , Tab 119, page F607.60	3/9/2015 1:04:00 AM(UTC+0)
22:35	<p>JD texts Christi and Stephen Deuters: Thanks... Per my conversation with Dr. Kipper... I'm definitely going to have to surgery on my finger... I need a pin put in the fucker! Kipper adamantly explained to me just how dangerous it would be if it got infected !!! It's so exposed and raw and flappy and infinitely more susceptible to infections... Which, to me...??? That is immediately a flight to LA... Sorry, but, if I'm here..?? I'd prefer to just let it go and take my chances and refuse surgery... If I gotta get operated on? It will be on LA at Cedars, brutha!! There's nothing in this miserable poisonous world that could make me expose this mangled creepy boneyard finger to whatever brutal virulent bacteria that awaits me !!! Plane????!!! Love... Cannibal Cunt</p>	File 6 ,Tab 119, page F607.61	3/9/2015 12:35:48 PM(UTC+0)

22:45	<p>JD texts Christi and Stephen Deuters:  When are they expecting to decide the fate of what's left of said digit??? Please remind them that in the last schedule, I was off from the 10th to something like the 27th!!! Also, please look at the schedule and make sure that I am scheduled off for both my kids birthday!!! It is ALWAYS written into my contract... Thank you, by the way, for cleaning my violent marriage...  Fuck... What a shame and sham... Sad... Love you, me darlin' boy...  The Goddam Devil</p>	File 6, Tab 119, page F607.60	3/9/2015 12:45:58 PM(UTC+0)
Time unknown	<p>Medical notes for AH:</p> <p><b>3/9/15:</b> RN and ct in touch via text and phone calls after ct arrived at 1500. Ct expressed feeling "sad." Ct attended two hour psychotherapy session. Reports feeling "a little more sorted out" after session. RN met ct and her friends for dinner at 2200. Ct appears in good spirits; laughing, socializing. Appetite normal. Ct states she would like to discuss recent events between her and husband with RN in private tomorrow. Plans are made for RN to visit ct at her home tomorrow. Ct has been compliant with medication throughout day with prompting. RN encouraged ct to notify her of any needs throughout night.</p>	File 9, Tab 132, page K205	
Time unknown	<p>Text from Connell Cowan to Amber:  "I know you're discouraged and feeling lost right now. I don't know what's going on but I do know that. You have two choices here: you can isolate or you can reach out. I know how much you [want] to change. You want to do something that moves in the right direction? Call me. Together we can pick our way through whatever is going on. Now is the time to be kind to yourself, not angry. Pick up the phone Amber."</p>	File 9, Tab 133, page K256	
Time unknown	Photographs taken of writing in paint/blood on mirrors	File 6, Tab 148b, F894.049-50	

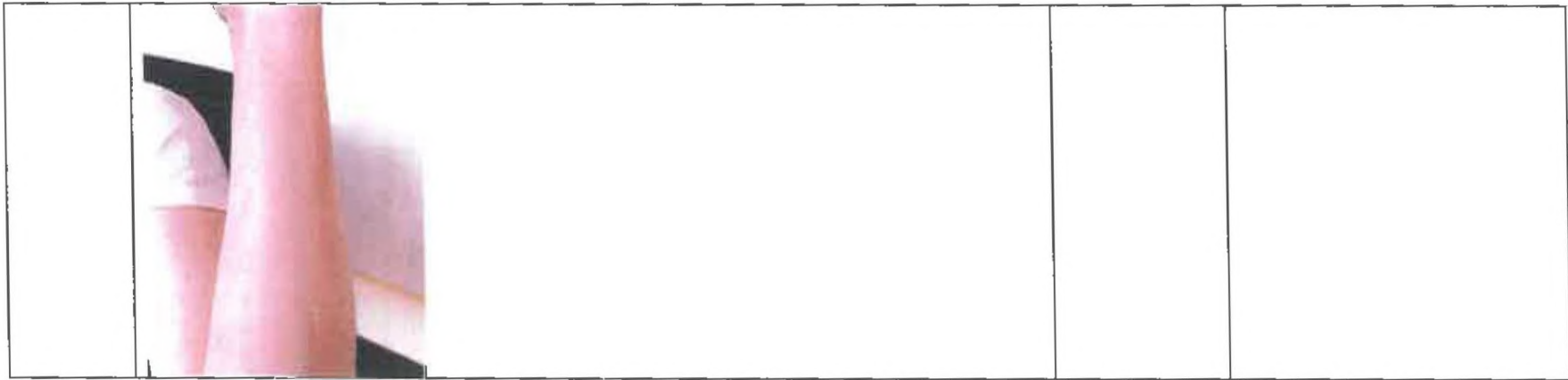


Date unknown

Time  
unknown

Photograph of injuries on AH's arm







See also:

- File 4, Tab 136(a): email from Michael Kalamaras dated 4 May 2015
- File 4, Tab 136(b): email from David Kulber dated 27 June 2015


**21 – 22 May 2016**  
 Defendants' chronology of relevant documentary evidence

**Saturday 21 May 2016, Los Angeles ("LA")**

Time (LA)	Event	Trial bundle reference	Comments
16:14	Text from AH to JD: <i>let me know if you're still coming. ok</i>	7/28(b)/H14 4.8	
16:40	Text from JD to AH: <i>was going to... unless you'd rather not.</i>	7/47(a)/H18 8.1	
16:43	Text from AH to JD: <i>no, of course I do. Was just checking</i>	7/28(b)/H14 4.8	
17:06	Text from Bruce Witkin to JD: <i>Hey brother. Just got to NY. How you doing? You no answer my text. Just thinking about you. Bwoosie</i>	7/26(a)(i)/H 141.1E	Time zone recalculated
18:18	Text from JD to AH: <i>En mid route...</i>	7/28(b)/H14 4.8	
18:21	Text from JD to Bruce Witkin: <i>Still s big question mark... Am on my way to see her and breakup... I'm all butterflies... I hate myself!!! X.</i>	7/26(a)(i)/H 141.1E	Time zone recalculated
18:48	Text from AH to JD: <i>OK let me know when you're here</i>	7/28(b)/H14 4.8	
18:58	Text from JD to AH: <i>Here</i>	7/28(b)/H14 4.9	
~19:02	JD, Sean Bett and Jerry Judge arrive at the Eastern Columbia Building ("ECB") and travel in lift up to penthouse ("PH") level:		
		AH_TPD_0 0017249	There is a discrepancy of c. 6 mins between the time shown by, on the one hand, cameras 4 and 13, and on the other hand camera 2.  Ds' position is that the time shown on footage from camera 2 (the camera in the lift) is the accurate time.
		AH_TPD_0 0017250	




Appendix 4 to Defendants' closing submissions

Time (LA)	Event	Trial bundle reference	Comments
		AH_TPD_00017251	
19:46	JD and AH telephone use JD's telephone to call Kevin Murphy. See Kevin Murphy's telephone records.	5.1/191/F1199	
19:48 – 19:57	AH attempts to call Savannah McMillan at 7:48:36, 7:48:38, 7:49:14, 7:49:17, 7:57:16, 7:57:17. None of these calls last more than 7 seconds. See AH's telephone records, item numbers 13200 – 13205.	5.1/192(a)/F1199.1	Time zone recalculated
20:00	Text from Kevin Murphy to Sean Bett: <i>You at Sweetzer?</i>	5.1/192/F1198	
	Text from Sean Bett to Kevin Murphy: <i>J calling u on my phone</i>	5.1/192/F1198	
	According to iO Tillet Wright's contemporaneous email (email from iO Tillet Wright to AH on 22 May 2016 at 7:55am, Subject: "What happened"): <i>"At 8pm PST Amber texted me and asked me to call her."</i>	8/83/I40	
20:02	Text from AH to Kevin Murphy: <i>I am shocked. What have I ever done to you?</i>	7/26(c)/H141.4 - H141.6 (correct time zone); 7/28/H144.1 (incorrect time zone)	Time zone recalculated
20:03	Text from AH to Kevin Murphy: <i>How could you say that?</i>	7/26(c)/H141.4 - H141.6 (correct time zone); 7/28/H144.2 (incorrect time zone)	Time zone recalculated
20:04	Text from AH to Kevin Murphy: <i>I never expected such a thing from you. I never told you I had anything to do with it. I never said anything like that to you. And you know it. I just can't understand what you have against me that would make you lie against me in such a way. I don't understand Kevin. I really don't</i>	7/26(c)/H141.4 - H141.6 (correct time zone); 7/28/H144.3 (incorrect time zone)	Time zone recalculated
	Text from AH to Savannah McMillan: <i>Call me!</i>	7/26(d)/H141.7 – H141.8	Time zone recalculated

Appendix 4 to Defendants' closing submissions

Time (LA)	Event	Trial bundle reference	Comments
20:05	Texts from AH to Savannah McMillen: <i>Call me!!!!!!</i> <i>Please</i>	7/26(d)/H14 1.7 – H141.8	Time zone recalculated
	AH attempted to call Savannah McMillan. Call lasted 3 seconds. See AH's telephone records, item 13206.	5.1/192(a)/F 1199.1	Time zone recalculated
20:06	Text from AH to Raquel Pennington: <i>Can you come over v</i>	7/13/H81	
20:08	Texts from AH to iO Tillet Wright: <i>Call me</i> <i>Plans</i> <i>*pleass</i>	7/26(e)/H14 1.9 (correct time zone); 7/27/H143 (incorrect time zone)	Time zone recalculated
20:10	Text from Raquel Pennington to AH: <i>Now?</i>	7/13/H81	
20:11	Two telephone calls from iO Tillet Wright to AH. First call lasts 0:23 minutes. Second call starts at 20:11:54 and lasts 3:28 minutes so runs until <b>20:15:22</b>  See: <ul style="list-style-type: none"> <li>• AH's telephone records, item numbers 13207 and 13208.</li> <li>• iO Tillet Wright's telephone records showing two calls to (323) 541-8111 at "05/21/16, 11:11 PM".</li> </ul>	AH's telephone records: 5.1/192(a)/F 1199.1  iO Tillet Wright's telephone records: 5.1/192(b)/F 1199.8	Time zone recalculated
20:15	iO Tillet Wright tries to telephone Raquel Pennington at "05/21/16, 11:15PM". Call lasts c. 1 minute. See iO Tillet Wright's telephone records.	5.1/192(b)/F 1199.8	Time zone recalculated
20:16	Texts from iO Tillet Wright to Raquel Pennington: <i>Are you at eastern??</i> <i>JD attacking amber</i> <i>She told me to call 911</i> <i>I'm doing it</i>	8/58/H420	
	iO Tillet Wright telephones 911 and reaches New York Police Department ("NYPD"). Call lasts c. 7 minutes. See iO Tillet Wright's telephone records at "05/22/16, 3:16AM"	5.1/192(b)/F 1199.8	Time zone recalculated
20:18	Text from iO Tillet Wright to AH: <i>Calling 911</i>	7/27/H142. Part of same conversation as at 7/26(e)/H14 1.9.	Time zone recalculated
20:20	Text from Kevin Murphy to AH: <i>Look. First of all... I did not even go directly to J about our conversation. He was told by someone else and then he questioned me days later so I had to answer. I had no knowledge of any of</i>	7/26(c)/H14 1.4 - H141.6 (correct time zone);	Time zone recalculated

Appendix 4 to Defendants' closing submissions

Time (LA)	Event	Trial bundle reference	Comments
	<i>your's and J's conversations about the incident so it doesn't even make sense for me to just make something up. Furthermore, at the time, I didn't even think it was a big deal that it was being described as a prank. If I was going to fabricate something it would certainly be better than that?? I merely answered his questions without any malice or intention of hurting you or him for that matter.</i>	7/28/H144.4 (incorrect time zone)	
Time unknown	Text from AH to Kevin Murphy: <i>You literally told johnny, in front of me, that I told you it was a prank!! And now you want to explain?!? How could you?! That was a complete lie – and you know it. You can not look me in the eye and tell me we had that conversation. I can't believe you. What did I ever do to you?</i>	8/60/H681	
20:22	Text from Raquel Pennington to iO Tillet Wright: <i>Call me</i>	8/58/H420	
20:23		6/148(e)/F8 94.155A (with metadata)	
	NYPD creates entry for having received a call from "IO WRIGHT." Report says that iO Tillet Wright states "her friend called her from 849 South Broadway, Los Angeles, CA 90014" and that "she being assaulted by her husband" and "her friend was hit with the phone and them she scream call 911." The report lists iO Tillet Wright's telephone number (646-644-6847) and AH's telephone number as a call-back number (323-541-8111).	5.1/191(a)/F 1197.4	Time zone recalculated
20:24	iO Tillet Wright telephones Raquel Pennington. Call lasts c. 2 minutes. See iO Tillet Wright's telephone records.	5.1/192(b)/F 1199.8	Time zone recalculated
20:25	iO Tillet Wright telephones Lauren Shapiro. Call lasts c. 2 minutes. See iO Tillet Wright's telephone records.	5.1/192(b)/F 1199.8	Time zone recalculated
20:27	Audio recording of woman's voice (Lauren Shapiro) reporting an assault at ECB.	Audio: "F160b LAPD phone recordings - Audio disk 2- Track 1"  Transcript: 5/160/F1003 -F1005	
20:28	iO Tillet Wright receives telephone call from blocked number. Call lasts c. 2 minutes. See iO Tillet Wright's telephone records.	5.1/192(b)/F 1199.8	Time zone recalculated


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Time (LA)	Event	Trial bundle reference	Comments
~20:29	JD, Sean Bett and Jerry Judge travel in lift from PH level down to car parking level then leave ECB: 	01. Video 63 — AH_TPD_00017252.avi	There is a timing discrepancy between different cameras.  Ds' position is that the time shown on footage from camera 2 (the camera in the lift) is the accurate time.
		AH_TPD_00017259	
		AH_TPD_00017260.avi	
		AH_TPD_00017258	




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Time (LA)	Event	Trial bundle reference	Comments
20:30	Los Angeles Police Department ("LAPD") Incident recall report starts:  <small>Date: 05/21/16 20:30 Incident Initiated By: PC/DELAHERA, B-299 05/21/16 20:30 PP/THREKUP 1 - PR RECEIVED CALL FR VICT FRIEND "AMBER", ASSAULTED BY 05/21/16 20:30 BOP/THREKUP, PR ADVISED TO GIVE FURTHER 05/21/16 20:30 Under Recommendation: BPO/LAB- W3 BPO/LAB- W3 BPO/LAB- W3 BPO/LAB- W3 BPO/LAB- W3 BPO/LAB- W3 Case Description: SH PD/83299 SH PD/83299 SH PD/83299 SH PD/83299</small>	5.1/191/F11 97.1	
20:33	Audio call between NYPD and LAPD in which NYPD briefs the LAPD about the incident	Audio: "F160c. LAPD phone recordings - Audio disk 2- Track 2"  Transcript: 5/160/F1006 -F1008	
20:36	Text from iO Tillet Wright to Raquel Pennington: <i>Does she have her phone with her?</i> Text from Raquel Pennington to iO Tillet Wright: <i>Yes she's talking to her lawyer</i>	8/58/H420- 421	
20:37	LAPD record the information provided to them by NYPD:  <small>05/21/16 20:37 DUPLICATE: LA 7G PD/82721 05/21/16 20:37 DUPLICATE: CRANE: NYPD/PCT JOHNSON OFF: 846 610 9030 CONTACT COMP: N FAS: N PR: 2 7G PD/82721 SRC: 0 05/21/16 20:37 2ND HAND FR NYPD, FEM/DECLINED CALLED AND ADVISED HER FRIEND WAS INVOLVED 7G PD/82721 05/21/16 20:37 IN A DOMESTIC DISPUTE, SUSP JOHNNY HEARD, W/M 53 YRS OLD BRO HAIR BRO 7G PD/82721 05/21/16 20:37 EYES 511 LINK 12 W/MS, VICT AMBER C/B 323 541 6111 7G PD/82721</small>	5.1/191/F11 97.1	
20:38	Text from iO Tillet Wright to Raquel Pennington: <i>Ok. The cops have her number</i>		
20:39	Texts from Raquel Pennington to iO Tillet Wright: <i>Are they indeed coming?</i> <i>Calling when they arrive?</i> Text from iO Tillet Wright to Raquel Pennington: <i>They are on their way they said.</i> Text from Raquel Pennington to iO Tillet Wright: <i>Ok</i> Texts from iO Tillet Wright to Raquel Pennington: <i>Probably not gonna call</i> <i>I told them penthouse 3 so maybe tell the door guy to call you</i> <i>when they are downstairs coming up</i>	8/58/H420- 421	
20:40	Text from Raquel Pennington to iO Tillet Wright: <i>Ok thank you</i>	8/58/H420- 421	
20:41	Text from iO Tillet Wright to Raquel Pennington: <i>Of course. Please keep me posted</i> Text from Bruce Witkin to JD: <i>What do you mean you hate yourself? Don't be crazy. Please call me when you feel that way.</i>	8/58/H420- 421  7/26(a)(i)/H 141.1E	Time zone recalculated
20:46	First set of police officers (Saenz/Hadden) dispatched to ECB:	5.1/191/F11 97.1	





Appendix 4 to Defendants' closing submissions

Time (LA)	Event	Trial bundle reference	Comments
	<p>05/21/16 20:43 I/C ANY 76 PD/N2721</p> <p>05/21/16 20:46 Stacked Incident LPD/PD160521004756 To:PD/1A1-W3 78 PD/N4558</p> <p>05/21/16 20:46 Stacked Incident LPD/PD160521004756 By:PD/1A1-W3</p> <p>05/21/16 20:46 Stat: 05 PD/1A1-W3 Loc: 849 S BROADWAY 80 PD/N2335</p> <p>05/21/16 20:46 Stat: 08 PD/1A1-W3 Loc: 849 S BROADWAY 80 PD/N2335</p> <p>05/21/16 20:46 Primary Unit Changed PD/1A1-W3 81 PD/N2299</p> <p>05/21/16 20:46 Unit CHANGED To: PD/1A1-W3 81 PD/N2299</p> <p>05/21/16 20:57 Stat: 16 PD/1A1-W3 Loc: 849 S BROADWAY</p>		
	<p>Josh Drew starts to receive telephone calls from Jerry Judge "as Johnny had left his phone there, and Jerry wanted me to bring it down for him to pick up. I told him not to pull into the complex, and that I would meet him at the front door. We had a verbal confrontation in the process of handing off the phone..."</p> <p>See also Josh Drew's deposition, pages 214-216: he "got a call on [his] cell phone from Jerry Judge saying something like 'The boss left his cell phone. Do you have it?' And I said, 'Yeah. I have it in my hand.'" Josh said that Jerry told him "We're coming back to get it," and that Josh responded "You can come back to get it, but you don't fucking set foot in this building. I will meet you outside." Josh met them "right out front of the Eastern Building on Broadway." He says that at this point, JJ asked him "Is she okay?" and that Josh responded "Are you fucking kidding me? He beat the shit out of her again, and you guys stood by and watched it." Josh says that JJ responded "It's not my business. It's between husband and wife. He barely touched her."</p>	<p>8/82/I37</p> <p>2.1/64/E226</p>	
~20:53	<p>Josh Drew leaves ECB:</p> 	AH_TPD_0 0017262	
20:57	<p>First set of police officers (Saenz/Hadden) arrive at ECB:</p> <p>05/21/16 20:57 Stat: AS PD/1A1-W3 Loc: 849 S BROADWAY</p>	5.1/191/F11 97.1	
~21:01	<p>Josh Drew re-enters ECB and travels in lift back upstairs to PH level, exiting onto PH level at 21:02</p>	AH_TPD_0 0017262	There is a timing discrepancy between

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Time (LA)	Event	Trial bundle reference	Comments
			<p>different cameras.</p> <p>Ds' position is that the time shown on footage from camera 2 (the camera in the lift) is the accurate time.</p>
		<p>AH_TPD_0017263</p>	
		<p>02(b). Video 75 – ALH_TPD_00017264.avi</p>	
<p>21:01</p>	<p>Text from AH to iO Tillet Wright: <i>Please</i></p> <p>Text from iO Tillet Wright to AH: <i>I did already are the cops not there??</i></p>	<p>7/38/H163. Part of same conversation as at 7/26(e)/H141.9.</p>	<p>Time zone recalculated</p>
<p>21:02</p>	<p>Text from AH to iO Tillet Wright: <i>No</i></p> <p>Text from iO Tillet Wright to AH: <i>Fuck man they said they were on their way</i></p>	<p>7/38/H163. Part of same conversation as at</p>	<p>Time zone recalculated</p>

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Time (LA)	Event	Trial bundle reference	Comments
		7/26(e)/H14 1.9.	
21:03	Text from iO Tillet Wright to AH: <i>Have josh call because when I do it they have to patch it through to LA. It'll be faster if it's someone local and they say it's an assault underway.</i>	7/38/H163. Part of same conversation as at 7/26(e)/H14 1.9.	Time zone recalculated
21:04		6/148(e)/F894.187A (with metadata)	
		6/148(e)/F894.185A (with metadata)	
	First set of officers (Saenz/Hadden) enter lift at reception level and are "fobbed up" to PH level by conceierge (Gaylynn Sumerlin). They exit elevator onto PH level at 21:05  	02(a). Video 57 – ALH_TPD_00017246.avi	
	Text from JD to Bruce Witkin: <i>It's done!!!</i>	7/26(a)(i)/H 141.1E	Time zone recalculated
21:16	First set of police officers (Saenz/Hadden) leave business card timed at 9:16pm: <i>"Radio call of Dispute. Refused report. Adv'd can call @ later time if changes mind"</i>	9/145/O2-O3	









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Time (LA)	Event	Trial bundle reference	Comments
21:18	Text from iO Tillet Wright to AH: <i>Anything?</i>	7/38/H163. Part of same conversation as at 7/26(e)/H14 1.9.	Time zone recalculated
~21:19	<p>Josh Drew shows two police officers (Saenz/Hadden) out into the lift at PH level, presses the lift button, then shakes their hands and leaves. The officers go down in the lift and exit the lift at reception level at 21:20:</p> 	02(a). Video 57 – ALH_TPD_00017246.avi	<p>There is a timing discrepancy between different cameras.</p> <p>Ds' position is that the time shown on footage from camera 2 (the camera in the lift) is the accurate time.</p>
		AH_TPD_00017266	
		AH_TPD_00017267	





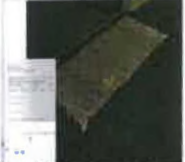


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Time (LA)	Event	Trial bundle reference	Comments
		AH_TPD_0017268	
	<p>Pictures taken of officers' business card:</p> 	6/148(e)/F8 94.155B (with metadata)	
		6/148(e)/F8 94.155C (with metadata)	
21:22	<p>05/21/16 21:22 MET W/ VICT. CHKD LOC. VERIFIED HUSBAND LEFT LOC. VICT ADVISED VERBAL            05/21/16 21:22 DISPUTE AND REFUSED TO GIVE ANY PRTR INFO. ISSUE BUS CARD            05/21/16 21:22 Stat: CL PD/1A1-W3            05/21/16 21:22 Disposition #1 CHANGED To: OCCSN:OFCR COMPLETED CALL SUPV NO            05/21/16 21:22 OCCSN:OFCR COMPLETED CALL SUPV NO            05/21/16 21:22 Incident Closed: 16/05/21 21:22</p>   	<p>5.1/191/119 7.1</p> <p>6/148(e)/F8 94.157A (with metadata)</p> <p>6/148(e)/F8 94.159A (with metadata)</p> <p>6/148(e)/F8 94.161A (with metadata)</p>	








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Time (LA)	Event	Trial bundle reference	Comments
		6/148(e)/F8 94.163A (with metadata)	
21:23	<p>Text from JD to AH, Raquel Pennington and Josh Drew:  <i>That was it. The last encounter forever. You were already ready to strike!!! Why did I even come there in the 1st place?? To be yelled at by you!!! I'm an idiot. ph5 is Rocky's studio?? You are shameless... I tried to make it work and you just turned more and more into a spoiled brat. All you wanted was to make me fucking miserable. Well, I'm finally there. I'll never be able to understand how I fell in love with you... You're not her. I loved you more than anything... I did everything that I could. But, you never fuckin' loved me... I was merely convenient for you... I hope our divorce goes as quickly as possible and that it is as painless as possible. So sorry you were as unhappy with me, as you were..., obviously, the purity of whatever was, has been gone for a long time. I will miss the moments of beauty and truth... goodbye, Amber... What the fuck was I thinking?? I wish you all you merit... The Former Him</i></p>	10/147(a)/O 365	
21:24		6/148(e)/F8 94.165A (with metadata)	
		6/148(e)/F8 94.167A (with metadata)	
21:25		6/148(e)/F8 94.169A (with metadata)	
		6/148(e)/F8 94.171A (with metadata)	
		6/148(e)/F8 94.173A (with metadata)	




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Time (L.A)	Event	Trial bundle reference	Comments
		6/148(e)/F8 94.175A (with metadata)	
		6/148(e)/F8 94.189A (with metadata)	
		6/148(e)/F8 94.176A (with metadata)	
21:26		6/148(e)/F8 94.176B (with metadata)	
		6/148(e)/F8 94.176C (with metadata)	
		6/148(e)/F8 94.176D (with metadata)	
		6/148(e)/F8 94.176E (with metadata)	





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Time (LA)	Event	Trial bundle reference	Comments
		6/148(e)/F8 94.176F (with metadata)	
21:27		6/148(e)/F8 94.191A (with metadata)	
		6/148(e)/F8 94.183A (with metadata)	
21:28		6/148(e)/F8 94.201	
21:29	Text from Elizabeth Marz to Raquel Pennington: <i>Tell josh to come here quickly if your with him</i>	8/57/H224; 6/119/F697. 164	
21:31		6/148(e)/F8 94.177A (with metadata)	
		6/148(e)/F8 94.179A (with metadata)	
		6/148(e)/F8 94.181A (with metadata)	





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Time (LA)	Event	Trial bundle reference	Comments
		6/148(e)/F8 94.193A (with metadata)	
		6/148(e)/F8 94.195A (with metadata)	
22:05	AH calls iO Tillet Wright. Call lasts 1 minute and 53 seconds. See AH's telephone records, item 13209.	5.1/192(a)/F 1199.1	Time zone recalculated
22:07	Text from Erin Boerum to AH: <i>Hey I'm going to be around your area tomorrow to look at some houses. Let me know if you are up for some company. Have a good night. Xo</i>	7/28(a)/H14 4.6	
22:09	Police records for second set of officers start:  <div style="font-size: small;"> <p>05/21/16 22:09 Incident Initiated By: PD/GUEREND, R-976</p> <p>05/21/16 22:09 TELETYPE FROM NYFD ICAD #016052125292, FEMALE STATED SHE WAS ON PHONE WITH HER FRIEND AND SHE BEGAN SCREAMING AT HER HUSBAND, SUBJ ^AMBER HEARD^, HUSBAND ^JOHNNY HEARD^ M/W 53 YRS, 511, NFD/NFI</p> <p>05/21/16 22:09 Units Recommended: BPO/1A85-W3 PD/1A85-W3 BPO/1A85-W3 BPO/1A85-W3 BPO/1A85-W3</p> <p>05/21/16 22:09 LOC BPO REVIEWED: 5</p> <p>05/21/16 22:09 IN PENTHOUSE #3</p> <p>05/21/16 22:09 Apartment Number CHANGED To: 3</p> </div>	5.1/191/F11 97.3	
22:16 - 22:17	<div style="font-size: small;"> <p>05/21/16 22:16 Stacked Incident LPDL PD160521005437 To: PD/1A61-W3</p> <p>05/21/16 22:16 Stacked IncAck'd LPDL PD160521005437 By: PD/1A61-W3</p> <p>05/21/16 22:17 Stat: DS PD/1A61-W3 Loc: 849 E BROADWAY</p> <p>05/21/16 22:17 Stat: ER PD/1A61-W3 Loc: 849 E BROADWAY</p> <p>05/21/16 22:17 Primary Unit Changed PD1A61-W3</p> <p>05/21/16 22:17 Unit CHANGED To: PD1A61-W3</p> </div>	5.1/191/F11 97.3	
22:24	Text from Melanie Inglessis to AH: <i>U ok babe?</i>	2/60/E95 – E96 (correct time zone); 7/32/H150 (incorrect time zone)	Time zone recalculated
	<b>Unit Summary</b>  Unit PD/1A61-W3 Dispatch 22:17:02 Enroute 22:17:05 AtScene 22:24:00 Canc		
22:25	Isaac Baruch and unidentified male enter lift at PH level and go downstairs to lobby level  	04(b). Video 83 – AH_TPD_0 0017272	

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Time (LA)	Event	Trial bundle reference	Comments
~22:28	Second set of officers enter the building, go to reception, and are shown to the lift and "fobbed" up to PH level, exiting onto PH level at 22:28	AH_TPD_0017269	<p>There is a timing discrepancy between different cameras.</p> <p>Ds' position is that the time shown on footage from camera 2 (the camera in the lift) is the accurate time.</p>
			
		AH_TPD_0017270	
		AH_TPD_0017271	
		04(a). Video 59 – ALH_TPD_00017248.avi	
22:30	AH calls iO Tillet Wright. Call lasts 5 seconds. See AH's telephone records, item 13210	5.1/192(a)/F1199.1	Time zone recalculated
	Text from Raquel Pennington (using AH's phone) to iO Tillet Wright: <i>It's rock</i>	7/38/H163. Part of same conversation as at 7/26(e)/H141.9.	Time zone recalculated
22:31	Texts from Raquel Pennington (using AH's phone) to iO Tillet Wright: <i>The cops came</i>	7/38/H163. Part of same conversation	Time zone recalculated

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Time (LA)	Event	Trial bundle reference	Comments
	<i>Locks are being changed tomorrow</i>	as at 7/26(e)/H14 1.9.	
~22:34 – 22:36	Second set of officers get into lift at PH level, travel back down to reception, and exit the building. Meanwhile, Isaac Baruch goes up from reception level to PH level.	04(a). Video 59 - AH_TPD_00017248	There is a timing discrepancy between different cameras.
	<p>Officers going down:</p> 		Ds' position is that the time shown on footage from camera 2 (the camera in the lift) is the accurate time.
	<p>Isaac Baruch going up:</p> 	04(a). Video 59 - AH_TPD_00017248	
	<p>Officers leaving:</p> 	AH_TPD_00017274	
		ALH_TPD_000017275	



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Time (LA)	Event	Trial bundle reference	Comments
		AH_TPD_1 7276	
22:43	Text from Kevin Murphy to Sean Bett: <i>Loft front desk said that the cops were up on the PH level 10 min ago.</i>	5.1/192/F11 98	
	Text from Sean Bett to Kevin Murphy: <i>K</i>		
	Text from Kevin Murphy to Sean Bett: <i>Not sure where or for who... Front desk said they went up and came back ... [screenshot is cut off]</i>		
23:02	06/21/16 23:02 Command : UR PD/1A61-W3 Reassigned 05/21/16 23:02 Stacked InAck'd LPDL PD1605321005437 By:PD/1A61-W3	5.1/191/F11 97.3	
23:16	Text from AH to Melanie Inglessis: <i>No. Johnny came over 'to talk.' His mom just died. Then he went sideways. Convinced of some CRAZY shit. Beat on me. Cops were called. They just left. Filing a restraining order. Divorce goes through on Monday. My face looks stupid and swollen Bad night.</i>	7/32/H150. Part of same conversation as at 2/60/E95 – E96	Time zone recalculated
23:26	Texts from Melanie Inglessis to AH: <i>U need us to come over now?! And get you</i>	7/32/H150. Part of same conversation as at 2/60/E95 – E96	Time zone recalculated
23:50	Text from AH to Melanie Inglessis: <i>Cops came back. It's okay. Rock and josh are helping me. All okay. Sorry I couldn't communicate earlier. I'll text you tomorrow if that's okay.</i>	7/32/H150. Part of same conversation as at 2/60/E95 – E96	Time zone recalculated
23:52	Text from AH to Erin Boreum: <i>It's okay. Got – he was completely delusional and crazed. Hit me in the face several times, while on the phone to iO. She called the cops. Restraining order will be filed in the am. Cops just left. (Long after he did of course) Rocky and josh were here too. It was horrible.</i>	7/28(a)/H14 4.6-.7	
23:57		6/148(e)/202 A (with metadata)	

Appendix 4 to Defendants' closing submissions

Time (LA)	Event	Trial bundle reference	Comments
23:58	Text from AH to David Heard and Paige Heard attaching image of AH's face: <i>I think I'm done "being there" for johnny, wouldn't you agree, "mom and dad"?</i> 	7/33/H151-H153	Time zone recalculated
23:59	Text from Paige Heard to AH and David Heard: <i>Absolutely</i>	7/33/H151-H153	Time zone recalculated
00:00	Text from David Heard to AH and Paige Heard: <i>What did the happen</i>	7/33/H151-H153	Time zone recalculated
	Texts from AH to David Heard and Paige Heard: <i>I didn't even raise my voice to him. Let alone a finger. I called 911 Rocky rushed in because she heard me screaming</i>		



Sunday 22 May 2016, LA

Time (Los Angeles)	Event	Trial bundle reference	Comments
00:01	Text from David Heard to AH and Paige Heard: <i>So he came to the penthouse and you were there had you arranged to meet there and then you got in a fight? I just don't understand</i>	7/33/H151-H153	Time zone recalculated
00:03	Text from AH to David Heard and Paige Heard: <i>I called him again and said I was ready to talk. He was fucked up and delusional. Claiming some ridiculous shit I had no clue of or how to make sense of. Then he started hitting me with the phone and threw me down and hit me in the head. That's when rocky and then Josh rushed in. Cops came right after he split. That's all you need to know. If you text him or involve yourselves anymore in his life j will never speak to you guys again. Dad, either you understand that and respect that or you don't. But if you go against my wishes one more time, I will never speak to you again.</i>	7/33/H151-H153	Time zone recalculated
00:04	Text from Melanie Inglessis to AH: <i>I love you</i>	7/32/H150. Part of same conversation as at 2/60/E95 – E96	Time zone recalculated
	Texts from AH to David Heard and Paige Heard: <i>It took 20 mins. He was crazy. I didn't even tell. More or less raise a finger to him. Which shouldn't matter regardless. I am half his size. I have to file a restraining order and then official divorce on Monday.</i>	7/33/H151-H153	Time zone recalculated

Appendix 4 to Defendants' closing submissions

Time (Los Angeles)	Event	Trial bundle reference	Comments
	<i>Look at my face</i>		
00:05	Text from Paige Heard to AH and David Heard: <i>I am so sorry that anyone could do that to you</i>	7/33/H151-H153	Time zone recalculated
	Texts from Savannah McMillan to AH: <i>Are you ok?? It was 4 am I was asleep Call me??</i>	7/26(d)/H14 1.8 and 7/31/H148	Time zone recalculated
	Texts from AH to Savannah McMillan: <i>Can't talk About it</i>	7/26(d)/H14 1.8 and 7/31/H148	Time zone recalculated
00:06	Text from AH to Savannah McMillan: <i>Just wait til I call you</i>	7/26(d)/H14 1.8 and 7/31/H148	Time zone recalculated
	Texts from Savannah McMillan to AH: <i>But are you ok? Is everything alright? I'm worried!</i>		
00:07	Text from AH to Paige Heard and David Heard: <i>Cops just left</i>	7/33/H151-H153	Time zone recalculated
00:08	Text from Savannah McMillan to AH: <i>?!</i>	7/26(d)/H14 1.8 and 7/31/H148	Time zone recalculated
00:09	Text from Paige Heard to AH and David Heard: <i>Will you please call me tomorrow or text so I know you are ok? I love you</i>	7/33/H151-H153	Time zone recalculated
00:10	Text from Savannah McMillan to AH: <i>Amber!</i>	7/26(d)/H14 1.8 and 7/31/H148	Time zone recalculated
	Text from AH to Savannah McMillan: <i>Sav! Shit is bad. But I'm okay. Please don't text rocky or anyone. It's okay. I'll explain later.</i>	7/31/H148	
00:11	Texts from AH to David Heard and Paige Heard: <i>I have josh and rocky Thank you And yes – I'll text you Tell dad to stop play best friends with j. Thanks</i>	7/33/H151-H153	Time zone recalculated
	Text from Paige Heard to AH and David Heard <i>You have me too!</i>		
00:12	Text from Savannah McMillan to AH: <i>Call me whenever you can, I'm here. I love you.</i>	7/31/H148	Time zone recalculated
00:13	Text from Savannah McMillan to AH: <i>I won't text anyone.</i>	7/31/H148	Time zone recalculated
00:14	Texts from AH to Savannah McMillan: <i>I love you Shit got bad Cops just left Restraining order and divorce are going to filed Monday</i>	7/31/H148	Time zone recalculated

Appendix 4 to Defendants' closing submissions

Time (Los Angeles)	Event	Trial bundle reference	Comments
00:15	Texts from Savannah McMillan to AH: <i>Shit.</i> <i>You're not hurt are you?</i>	7/31/H148	Time zone recalculated
00:16	Text from Savannah McMillan to AH: <i>I can jump on a plane to LA at any time</i> Texts from AH to Savannah McMillan: <i>It's okay</i> <i>I'm safe now</i> <i>Was a little banged up</i> <i>But fine</i> <i>Now it's over</i>	7/31/H149	Time zone recalculated
00:18	Texts from Savannah McMillan to AH: <i>I'm furious</i> <i>I could fucking kill him</i> <i>I'm so sorry I didn't pick up I put my phone on silent when I sleep</i>	7/31/H149	Time zone recalculated
00:20	Texts from Savannah McMillan to AH: <i>Proud of you for going to the cops. You're so brave. Have you got a fortress around you? Sis, rock?</i> <i>Did he.. know?</i>	7/31/H149	Time zone recalculated
00:36	Texts from AH to Erin Boeurum attaching images of AH's face: 	7/28(a)/H144.7	
00:44	Text from Paige Heard to AH: <i>I'm so sorry about any role I played. I wanted you to know about Betty Sue. Not no unleash that crazy monstor</i>	7/34/H154	Time zone recalculated
00:45	Text from Paige Heard to AH: <i>I love you like crazy he's an sob</i>	7/34/H154	Time zone recalculated
00:49	Text from AH to iO Tillet Wright attaching image of AH's face: 	7/38/H163-165. Part of same conversation as at 7/26(e)/H141.9.	Time zone recalculated
01:15	Text from AH to Tasya van Ree: <i>It's been rough</i>	7/36/H161	Time zone recalculated
01:16	Text from AH to Tasya van Ree: <i>I need help i think</i>	7/36/H161	Time zone recalculated

Appendix 4 to Defendants' closing submissions

Time (Los Angeles)	Event	Trial bundle reference	Comments
03:00 – 03:01	05/22/16 03:00 Stat: DS PD/1A61-W3 Loc: 849 S BROADWAY 05/22/16 03:01 Stat: AS PD/1A61-W3 Loc: 849 S BROADWAY 05/22/16 03:01 RELATED TO PREV INC. VERBAL ARGUMENT ONLY. CHECKED RES. 05/22/16 03:01 Stat: CL PD/1A61-W3 05/22/16 03:01 Incident Closed: 16/05/22 03:01 05/22/16 03:01 Disposition #1 CHANGED To: GOASN:GONE ON ARRIVAL SUPV NO 05/22/16 03:01 GOASN:GONE ON ARRIVAL SUPV NO	5.1/191/F11 97.3	
04:57	Text from Paige Heard to AH: <i>I doubt that you 'l want to talk to me today or maybe anytime soon. I want very badly to talk to you. I am hear fully sorry for my role in the Betty Sue fiasco. I will never speak to him again – now that she 's dead</i>	7/34/H154	Time zone recalculated
05:05	Text from Paige Heard to AH: <i>I just offered my condolences and told him I'd try to let you know</i>	7/34/H154	Time zone recalculated
05:11	Text from Paige Heard to AH: <i>I'm so sorry that I did. I love you – please love me too</i>	7/34/H154	Time zone recalculated
06:00	Text from iO Tillet Wright to AH: <i>Great.</i>	7/38/H163. Part of same conversation as at 7/26(e)/H14 1.9.	Time zone recalculated
06:26	Text from Tasya van Ree to AH: <i>What do you need?</i>	7/36/H161	Time zone recalculated
06:52	Text from AH to iO Tillet Wright: <i>When do flu come back?</i>	7/38/H163. Part of same conversation as at 7/26(e)/H14 1.9.	Time zone recalculated
06:53	Texts from iO Tillet Wright to AH: <i>Basically Thursday What's happening over there now Are you ok? Did he get arrested? Are you taking out a restraining order?</i>	7/38/H163. Part of same conversation as at 7/26(e)/H14 1.9.	Time zone recalculated
06:57	Text from AH to iO Tillet Wright: <i>Yes restraining order</i>	7/38/H163. Part of same conversation as at 7/26(e)/H14 1.9.	Time zone recalculated
06:58	Text from AH to iO Tillet Wright: <i>They didn't go arrest him because I didn't make a statement</i>	7/38/H164. Part of same conversation as at 7/26(e)/H14 1.9.	Time zone recalculated
	Text from iO Tillet Wright to AH: <i>Good!! That's gonna be the only thing that will get him arrested next time</i>		
	Text from AH to iO Tillet Wright: <i>They said if I did, they would be obligated to go arrest him</i>		

Appendix 4 to Defendants' closing submissions

Time (Los Angeles)	Event	Trial bundle reference	Comments
	Text from iO Tillet Wright to AH: <i>Why didn't you</i>		
06:59	Texts from AH to Paige Heard: <i>I love you momma So much</i>	7/34/H154	Time zone recalculated
07:01	Text from Paige Heard to AH: <i>Thank you. I feel so badly about what happened. It never should have happened. I honestly didn't think you knew about Betty Sue. He is a crazy man</i>	7/34/H154	Time zone recalculated
07:04	Text from AH to Tasya van Ree: <i>I don't know. Just to know you're there. I might need to Talk</i>	7/36/H161	Time zone recalculated
07:05	Text from AH to Paige Heard: <i>I didn't know</i>	7/34/H154	Time zone recalculated
	Text from Paige Heard to AH: <i>I don't know what David said. Mine were condolences and where to send flowers, and did his dad know. That's all</i>	7/34/H154	
	Text from AH to Paige Heard: <i>He used that to come over and talk about our relationship Then accused me of some CRAZY shit.</i>	7/34/H154	
	Texts from AH to iO Tillet Wright: <i>Because it would have gone straight to TMZ Which will happen on Monday anyway</i>	7/38/H164. Part of same conversation as at 7/26(e)/H14 1.9.	
	Text from iO Tillet Wright to AH: <i>You ok my love? How you feeling?</i>	7/38/H164. Part of same conversation as at 7/26(e)/H14 1.9.	
07:06	Text from AH to Paige Heard: <i>Then started hitting me with the phone</i>	7/34/H155	Time zone recalculated
07:07	Text from Paige Heard to AH: <i>David said last night after you sent the picture that Johnny is crazy. Again I am sorry</i>	7/34/H155	Time zone recalculated
07:14	Text from Paige Heard to AH: <i>You don't deserve that kind of treatment. I'm so glad you were not fighting back. It will go a long way in court</i>	7/34/H155	Time zone recalculated
07:34	Text from Paige Heard to AH: <i>How are you feeling? As bad as your picture?</i>	7/34/H155	Time zone recalculated
07:44	Email from iO Tillet Wright to AH: Subject: <i>What happened</i>  <i>At 8pm PST Amber texted me and asked me to call her. When I called her she explained that Johnny was convinced that we had defecated in his bed as some kind of a prank. I started laughing at the absurdity of the situation, which he heard because Amber had put the phone on speaker phone. Johnny then walked away, which she told me, and went upstairs. I asked her why she was in a house</i>	8/83/I40	

Appendix 4 to Defendants' closing submissions






Time (Los Angel es)	Event	Trial bundle reference	Comments
	<i>with someone who had previously attacked her. She explained that his mother had died and she was worried about him and he needed some items from the house before going on tour with his band. I then heard Johnny come back downstairs and he picked up the phone and started yelling expletives at me. Still on speakerphone, I told Amber that she should get out of the house because I could tell that he was potentially going to get violent. At that point, I heard the phone be thrown. Shortly thereafter Amber pick the phone back up and explained that he had thrown it directly at her face and hit her with it. At that point I heard Johnny say "oh you think I hit you? What about if I pull your hair back?" The phone then dropped, I heard Amber shriek, and she yelled at me to please call 911. At that point I hung up texted Raquel that she needed to immediately go to penthouse 3 to intervene, and called the police.</i>		
07:55	Text from AH to Paige Heard: <i>Yeah</i>	7/34/H155	Time zone recalculated
07:58	Text from Paige Heard to AH: <i>I'd like to give him a price of my mind, but don't worry I won't. He is crazy. Can I do anything at all?</i>	7/34/H155	Time zone recalculated
	Texts from AH to Josh Drew: <i>Hey Josh, I hope you and Rocky got some sleep last night. I don't want to bother her on her big day but the lawyers asking for brief statements from you guys, as witnesses, so that she can file the appropriate way for a restraining order... Is there anyway that you could just write a brief statement this would happen and email it to her or email it to me and I'll forward it to her. Doesn't have to be fancy or even well-written, nothing like that, just basic brief play-by-play of what you saw.. I don't ask Rocky for it but maybe I will later after the fleamarket stuff is done</i>	7/35/H159 [Time stamps clearer in version at 2.1/64/E344 ]	Time zone recalculated
08:04	Texts from Josh Drew to AH: <i>No problem sweetheart. We're picking up right now, I'll be back by 10 to be there with you for the locksmith. I'll write something up then, and I'll help her out later this evening How are you doing? Need anything?</i>	7/35/H159 [Time stamps clearer in version at 2.1/64/E344 ]	Time zone recalculated
08:05	Texts from AH to Josh Drew: <i>thank you so much I'm okay. Just a little shaken up</i>	7/35/H159 [Time stamps clearer in version at 2.1/64/E344 ]	Time zone recalculated
08:06	Text from Josh Drew to AH: <i>Ok. You think of anything, let me know</i>	7/35/H159 [Time stamps are clearer in version at	Time zone recalculated

Appendix 4 to Defendants' closing submissions




Time (Los Angeles)	Event	Trial bundle reference	Comments
		2.1/64/E344 ]	
08:07	Text from Paige Heard to AH: <i>What the hell kind of phone? One of those 1960 jobs? I love you</i>	7/34/H155	Time zone recalculated
08:11	Text from AH to Paige Heard: <i>Huh?</i>	7/34/H155	Time zone recalculated
08:13	Text from Paige Heard to AH: <i>It looked like he used an old fashioned heavy phone</i>	7/34/H155	Time zone recalculated
08:17	Text from AH to iO Tillet Wright: <i>I'm suffering</i>	7/38/H164. Part of same conversation as at 7/26(e)/H14 1.9.	Time zone recalculated
08:18	Text from iO Tillet Wright to AH: <i>Fuck. Can I do anything? Is anyone with you?</i>	7/38/H164. Part of same conversation as at 7/26(e)/H14 1.9.	Time zone recalculated
08:25	Text from Paige Heard to AH: <i>And hit you very very hard. He should be ashamed</i>		
08:55	Texts from AH to Paige Heard: <i>No it's an iPhone he just threw it at me like a baseball Hit me square in the Eye</i>		
08:56	Texts from AH to Paige Heard: <i>I'm filing a restraining order tomorrow. Which means it's public as of tomorrow The lawyer said that's only thing I can do</i>		
08:58	Text from Paige Heard to AH: <i>I wish I could be there. Make sure they can enforce the restraining order. I'm very afraid for you</i>	7/34/H155	Time zone recalculated
09:00	Text from Paige Heard to AH: <i>I am so sorry</i>	7/34/H155	Time zone recalculated
10:03	Text from Josh Drew to AH: <i>ON my way back now</i> Text from AH to Josh Drew: <i>Great we're just waiting for the locksmith, FYI no rush</i>	7/35/H160 [Time stamps clearer in version at 2.1/64/E345 ]	Time zone recalculated
10:07	Texts from Tasya van Ree to AH: <i>I'm here Always babe</i>	7/36/H161	Time zone recalculated
10:08	Text from AH to Tasya van Ree: <i>Shit got bad last night. Cops were called. I filled a straining order... The whole thing</i>	7/36/H161	Time zone recalculated
10:10	Text from Tasya van Ree to AH: <i>Wow!</i>	7/36/H161	Time zone recalculated








Appendix 4 to Defendants' closing submissions

Time (Los Angeles)	Event	Trial bundle reference	Comments
10:11	Texts from Tasya van Ree to AH: <i>Are you okay?</i> <i>Physically that is</i>	7/36/H161	Time zone recalculated
11:03	Text from Erin Boerum to AH: <i>Hey how did you sleep? Get the things done this morning?</i>	7/28(a)/H14 4.5. Part of same conversation as at 7/28(a)/H14 4.6-.7	Time zone recalculated
11:31		6/148(e)/F8 94.208A (with metadata)	
		6/148(e)/F8 94.210A (with metadata)	
		6/148(e)/F8 94.212	
		6/148(e)/F8 94.214A (with metadata)	
		6/148(e)/F8 94.220A (with metadata)	






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Time (Los Angeles)	Event	Trial bundle reference	Comments
11:33		6/148(e)/F8 94.216A (with metadata)	
		6/148(e)/F8 94.218A (with metadata)	
		6/148(e)/F8 94.222A (with metadata)	
12:34	Text from AH to "Rocketman": <i>For Such a smart man..... I would think you wouldn't need to investigate any further than your last text to me before such radio silence commenced....</i>	7/37/H162	Time zone recalculated
12:57	Text from "Rocketman" to AH: <i>Well, I'm just glad you're ok. You talked about J being violent in the past and still having keys to the apartment, so I thought something might have happened.</i>	7/37/H162	Time zone recalculated
12:59	Text from AH to "Rocketman": <i>It did. But that's irrelevant. I had the locks changed.</i>	7/37/H162	Time zone recalculated
13:00	Text from AH to "Rocketman": <i>Legal divorce filing tomorrow. Restraining order – all that.</i>	7/37/H162	Time zone recalculated
13:04	Text from "Rocketman" to AH: <i>Wtf!?! But you're ok, right? Is there anything I can do?</i>	7/37/H162	Time zone recalculated
13:05	Text from "Rocketman" to AH: <i>I'm happy to engage 24/7 security for you, if you'd like. It would be utterly confidential.</i>	7/37/H162	Time zone recalculated
~13:06 – 13:09	AH enters lift at PH level, travels down to reception level, exits the lift at 13:06:55, goes to reception desk where she interacts with Cornelius Harrell, goes to mail room with Cornelius Harrell, returns to the lift (this time holding a package under her right arm) and enters lift at 13:09:03, then travels up to the parking level, exits lift, goes to car, and drives away.	05. Video 43 – AH_TPD_0 0017232	There is a timing discrepancy between different cameras.


Appendix 4 to Defendants' closing submissions

Time (Los Angeles)	Event	Trial bundle reference	Comments
			Ds' position is that the time shown on footage from camera 2 (the camera in the lift) is the accurate time.
		05. Video 43 AH_TPD_0017232	
	13:07: text from AH to "Rocketman": <i>All that is irrelevant to why I stopped talking to you</i>	7/37/H162 (time zone recalculated)	
		AH_TPD_0017234	
		AH_TPD_0017234	
		AH_TPD_0017233	





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Time (Los Angel es)	Event	Trial bundle reference	Comments
		AH_TPD_0 0017233	
		05. Video 43 - AH_TPD_0 0017232	
		05. Video 43 - AH_TPD_0 0017232	
		05. Video 43 - AH_TPD_0 0017232	
		AH_TPD_0 0017235	




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Time (Los Angeles)	Event	Trial bundle reference	Comments
		AH_TPD_0017237	
13:10	Text from "Rocketman" to AH: <i>I know. And the offer would stand even if you never wanted to see me again.</i>	7/37/H162	Time zone recalculated
13:20	Text from "Rocketman" to AH: <i>Anyway, sorry for being an idiot. The radio silence hurt a log. It only matters because I really like you.</i>	7/37/H162	Time zone recalculated
13:23	Text from AH to Erin Boerum: <i>Not really... Was a rough one. By the way, I'm at the pharmacy right now trying to pick up my prescription for Xanax that apparently Dr. Kipper called in but it's not here</i>	7/28(a)/H14 4.5. Part of same conversation as at 7/28(a)/H14 4.6-.7	Time zone recalculated
13:24	Texts from AH to Erin Boerum: <i>Actually- I was looking at the wrong pharmacy! Let me try rite aid</i>	7/28(a)/H14 4.5. Part of same conversation as at 7/28(a)/H14 4.6-.7	Time zone recalculated
	Text from Erin Boerum to AH: <i>Oh geez. Did you tell him the phone number of the pharmacy? Just wondering if he got confused. It happens ;)</i>		
13:25	Text from AH to Erin Boerum: <i>Yeah I'm in ahead there soon but I'm crunched for time today. Do you know what time they close by any chance? I figured you might know the things off the top your head ha ha...</i>	7/28(a)/H14 4.5. Part of same conversation as at 7/28(a)/H14 4.6-.7	Time zone recalculated
13:30	Text from Erin Boerum to AH: <i>I know everything. Duh. I think Rite Aid closes at 6pm today.</i>	7/28(a)/H14 4.5. Part of same conversation as at 7/28(a)/H14 4.6-.7	Time zone recalculated
13:58	Pictures of AH (on the left-hand side of the picture) with Raquel Pennington at Ms Pennington's bead fair:	6/148(e)/F8 94.224A (with metadata)	

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Time (Los Angel es)	Event	Trial bundle reference	Comments
			
		<p>6/148(e)/F8 94.226A (with metadata)</p>	
		<p>6/148(e)/F8 94.228A (with metadata)</p>	
		<p>6/148(e)/F8 94.230A (with metadata)</p>	

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Time (Los Angeles)	Event	Trial bundle reference	Comments
		6/148(e)/F8 94.232A (with metadata)	
14:11	Text from Raquel Pennington to AH: <i>Can I post the pic of us?</i>	7/13/H81	
14:16	Text from AH to "Rocketman": <i>Yeah, hence why I was so affected by your text the other night</i>	7/37/H162	Time zone recalculated
14:41	Text from AH to "Rocketman": <i>Look, some things are hard to text... I'm here if you wanna ring</i>	7/37/H162	Time zone recalculated
14:46	Text from Paige Heard to AH: <i>Stick it to him tomorrow and let me know. I love you and I am proud</i>	7/34/H155	Time zone recalculated
Time unknown	Picture of AH at Amanda de Cadenet's birthday party. L-R: Amber Heard; Amanda de Cadenet; Amber Valletta 	6/148(e)/F8 94.234	See also document at 8/79/129: this is a text message from AH to iO Tillet Wright relaying what Amanda de Cadenet had said to AH about the birthday party.
15:00	Text from Paige Heard to AH attaching pictures of AH: <i>Not the arm ones yet</i> 	7/34/H156	Time zone recalculated
15:12	Text from "Rocketman" to AH: <i>Will do</i>	7/37/H162	Time zone recalculated
15:31	Text from Melanie Inglessis to AH: <i>Hi....</i>	7/32/H150. Part of same conversation as at	Time zone recalculated

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Time (Los Angeles)	Event	Trial bundle reference	Comments
		2/60/E95 – E96	
15:32	Text from Melanie Inglessis to AH: <i>Thinking of you</i>	7/32/H150. Part of same conversation as at 2/60/E95 – E96	Time zone recalculated
16:12	Text from JD to AH: <i>May we please speak for a few seconds today? It's very give you peace. And me. Please. I love you. X. JD</i>	7/47(a)/H18 8.1	
16:13	Text from Josh Drew to AH: <i>Hey lady, checking in to see how you're doing. Also, stop by when you get home, I have all of the keys</i>	7/35/H160 [Time stamps are clearer in version at 2.1/64/E345 ]	Time zone recalculated
17:00	Text from Paige Heard to AH: <i>Oh Baby, please get safe. The penthouse is not yet</i>	7/34/H156	Time zone recalculated
17:01	Text from JD to AH: <i>Sorry if was a bit ... Please know that my hurt toward you is over... My apologies are eternal and belong to you!!! Solid. X.</i>	7/47(a)/H18 8.1	
17:13	Texts from AH to JD: <i>Thank you. Can we still speak in a min?</i> Text from JD to AH: <i>Of course...</i>	7/28(b)/H14 4.9	
17:50	Text from AH to JD: <i>Sorry I'm just leaving Amanda's birthday now</i>	7/28(b)/H14 4.9	
18:19	Text from JD to AH: <i>Just let me know when you have a minute And I'll give you a call... Nothing I have to say to you should elicit anything but, a sense of ease... All my love and profound apologies... J.</i>	7/28(b)/H14 4.9	
18:22	AH returns to ECB and travels upstairs in lift from parking level to PH level:	AH_TPD_0017239	



Appendix 4 to Defendants' closing submissions

Time (Los Angel es)	Event	Trial bundle reference	Comments
			
18:37	<p>Texts from AH to JD:  <i>Yes, but I'm scared and sad and want to be alone and in a quiet place to talk. Are you okay if I wait til I get home to call?? I know you're busy so please tell me if that's okay?? I can text you when I'm there</i>  <i>Is that okay?</i></p>	7/28(b)/H14 4.10	
~18:41	<p>AH and Josh Drew get into lift at PH level, travel down to reception level, walk through lobby and exit building:</p>   	<p>AH_TPD_0 0017240</p> <p>AH_TPD_0 0017241</p> <p>AH_TPD_0 0017242</p>	<p>There is a timing discrepancy between different cameras.</p> <p>Ds' position is that the time shown on footage from camera 2 (the camera in the lift) is the accurate time.</p>
18:53	<p>Text from JD to AH:  <i>whenever you feel like it... i'm sad, i'm scared and i am broken, my sweet Slim...</i></p>	7/28(b)/H14 4.10	

Appendix 4 to Defendants' closing submissions

Time (Los Angeles)	Event	Trial bundle reference	Comments
18:55	Text from JD to AH: <i>i want you happy. i have ZERO harsh feelings... i am clear and i am me. the me that you once loved... we can cure one another of this constant misery born out of love...</i>	7/28(b)/H144.10	
20:42	Texts from Amanda de Cadenet to AH: <i>Hi sweetheart. Thank you for coming today despite what you are dealing with. Babe this is a moment that we dread. But it's here. You can take care of yourself even if you feel scared. This is the time to choose YOU. I would like to understand why you have to do anything legal today. Can you do nothing for tonight. Just make sure you are safe.</i>	7/30/H146	Time zone recalculated
20:52	Texts from AH to Amanda de Cadenet: <i>I love you. Thank you for saying that and for being there for me even on your special day. I am so sorry I hijacked it even for a moment with any of my drama. I love you so much and I hope that you felt as loved prescient it and honored as you are and deserve to be. And as far as my situation goes, Thank you so much for reminding me it's about me and to choose me. It is so hard sometimes to remember that,... In fact I seem to forget it every second these days.... I love you so much. I'm going to make some decisions tomorrow. I just want to sleep tonight,,, or tru to. Jesus, How much this hurts.</i>	7/30/H146	Time zone recalculated
20:57	Text from Amanda de Cadenet to AH: <i>Sleeping sounds like the best thing right now. Put some arnica on your face. Make sure you have photos of the injuries pls and text them to me or Rocky so there is a record. Sweetheart I have been where you are and it is excruciatingly painful. But pain is the cornerstone of growth and you have an incredible opportunity right now to change your life. Even if you don't believe it, act as if you deserve more, deserve better, deserve love and care and gentleness. Because you DO. I promise you can be free from this...</i>	7/30/H146	Time zone recalculated
20:59	Texts from Amanda de Cadenet to AH: <i>And I don't care how late/ early it is, if anything else happens just call me. Do you feel safe tonight? You are sure all the locks are changed?</i>	7/30/H147	Time zone recalculated
21:43	Email from Josh Drew to AH Subject: <i>Statement from JD &amp; RP</i> Attachments: <i>JD Statement.docx; RP Statement.docx</i>  <i>The purpose of this document is to describe, in the best possible manner, my description of events I was directly witness to on the evening of Saturday, May 21 . At 8:06PM, Amber sent a text to Raquel asking her to come over to PH3, where she was engaged in conversation with her husband, Johnny. I was in PH5 with Liz, waiting for them to complete the conversation. Approximately 15 minutes later, we heard Johnny shouting, and saw (through the peephole) both of his security team rush over in the direction of PH3. We heard him continue to shout, as well as what sounded like banging on the walls (which was confirmed with the dents and</i>	8/82/I36 – I39	

Time (Los Angel es)	Event	Trial bundle reference	Comments
	<p><i>scratches on the doors, as well as the wine spilled all over the hallway). During this, I locked the door to PH5 (we left the doors unlocked to let the girls freely travel from apartment to apartment throughout the day). I heard Johnny come up to the door and shout at his security to "open this fucking door, let me in this fucking place." Which they did without hesitation. He walked in and immediately started screaming at me. I can't remember exactly what he was saying, but it was a reputation something along the lines of: "Get the fuck out of my house," "You motherfuckers fucking sold me out," so on and so forth. The whole time, no more than 6" from my face, spitting in my face the whole time. I didn't respond in any way, rather, calmly made my way to the door. I had forgotten my keys, so I turned around to grab them. He followed me every step of the way throughout, screaming and spitting in my face. I did not see where Liz went to, as I thought she was right behind me. He made a beeline to go right at her, and she ran away. After I had left, I heard him screaming and smashing things inside the apartment as I made my way over to PH3 to check on Raquel &amp; Amber, during which they relayed what had occurred. I moved them over to our apartment PH1, and dead-bolted the door until we were certain he had left. I kept them inside PH1, and went down to the garage to confirm their departure. At 8:46PM, I started getting calls from his head of security, Jerry, as Johnny had left his phone there, and Jerry wanted me to bring it down for him to pick up. I told him not to pull into the complex, and that I would meet him at the front door. We had a verbal confrontation in the process of handing off the phone, which I can provide further detail should the need arise. I declare under penalty of perjury that the foregoing is true and correct. Executed on Sunday, May 22</i></p> <p>---</p> <p><i>The purpose of this document is to describe, in the best possible manner, my description of events I was directly witness to on the evening of Saturday, May 21. At approximately 7:15, Amber informed me that her husband Johnny would be coming over shortly to pick up a few of his personal effects &amp; discuss their current situation. At 8:06PM I received a text from Amber asking me to come over to PH3 right away. At 8:09PM I texted back to confirm she needed me immediately. At 8:11 PM I knocked on the door. The door was locked so I went back, grabbed my keys, knocked again, heard Johnny yelling. I immediately unlocked the door and came in to see him standing in the kitchen area. I asked if everything was ok, to which Amber replied "No. Help me." Johnny had a magnum of wine in his hand, and told me to leave. I looked at Amber holding her face &amp; her head, and she then told me that he threw her phone at her and hit her, and to please help her. He proceeded to argue, deny any and all wrongdoing, all while continuing to move closer to Amber. I stepped in front of him to shield her from him and put my hands on his chest, telling</i></p>		

Appendix 4 to Defendants' closing submissions




Time (Los Angel es)	Event	Trial bundle reference	Comments
	<p><i>him to "stay away from her." To this, he replied "get your fucking hands off me." He then proceeded shoved my hands out of the way, which I then put back on his chest. He shouted "Oh you want to be fucking tough now, where's your fucking bearded boyfriend, you've got what you want, you've got her to yourself." He then backed away, saying "the DNA test will prove it, We Will Find Out who did this." He walked over to the kitchen area to grab his bag I then went over to the couch to console Amber, who curled up in my arms, saying "I didn't do anything, I just called lo to confirm the story, I didn't do anything." While holding her on the couch, he starts yelling unintelligibly, ranting obscenities &amp; random accusations specifically at Amber throughout. He grabs his bag &amp; the wine, makes to leave, then turns around and comes back towards us, walks right up in front of us (still on the couch), states "Amber, get up," repeatedly, at least 10 times. All the while, no more than a foot away from us, with me still cradling her. At this point his security, Jerry &amp; Sean came in. As soon as they come in, he retreated away, about 15 feet. Amber got up to head towards the bathroom, telling Jerry that if he "hits me one more time I'm calling the cops." Johnny denied that he had struck her. He said that he had "thrown her phone at her, and that's what she's accusing me of." Amber then repeated what she had said before "I didn't do anything, if he hits me one more time I'm calling the cops." He then went into the kitchen area and started smashing things at random. His security did nothing but stand behind him. No effort was made to restrain him, no acknowledgment was made of the abuse, nor did they make any verbal effort to try and diffuse the situation or get him to walk away. He then stormed out of the apartment, screaming unintelligibly. That was the last I saw of him that evening. I heard him yelling and breaking things for the next 15-30 minutes in the hallway and other apartments. When I went to find Amber's phone and purse in PH3 and PH5, still not knowing if he was on the premises, I discovered broken belongings. This included my art that had been thrown against the wall, Amber's office that had been ransacked, framed photos that had been smashed and glass broken, and art that had been taken from the wall and left on the bed in Amber's room . In the public hallway there were puddles of spilled wine on the floor and splashed on the walls, and dents in the doors. Amber was in my apartment (PH1) when the police arrived. To my knowledge he had already vacated the premises. I declare under penalty of perjury that the foregoing is true and correct. Executed on Sunday, May 22.</i></p>		
<p>22:56 - 22:57</p>	<p>AH in lift with man:</p>	<p>AH_TPD_0 0017244</p>	

Appendix 4 to Defendants' closing submissions






Time (Los Angeles)	Event	Trial bundle reference	Comments
			

See also pictures of Amber Heard taken on 27-28 May 2016 at the following times:



**27 May 2016, LA**

09:18		6/148(e)/F8 94.235A (with metadata)	
		6/148(e)/F8 94.237A (with metadata)	
		6/148(e)/F8 94.239A (with metadata)	



Appendix 4 to Defendants' closing submissions

			<p>6/148(e)F8 94.241A (with metadata)</p>	
			<p>6/148(e)F8 94.243A (with metadata)</p>	
			<p>6/148(e)F8 94.245A (with metadata)</p>	
			<p>6/148(e)F8 94.247A (with metadata)</p>	
<p>13:35</p>			<p>6/148(e)F8 94.249A (with metadata)</p>	

Appendix 4 to Defendants' closing submissions

		<p>6/148(e)/F8 94.251A (with metadata)</p>	
		<p>6/148(e)/F8 94.253A (with metadata)</p>	
		<p>6/148(e)/F8 94.255A (with metadata)</p>	

28 May 2016, LA

<p>01:08</p>			<p>6/148(e)/F8 94.257A (with metadata)</p>	
			<p>6/148(e)/F8 94.259A (with metadata)</p>	




**15 - 31 December 2015**  
Defendants' chronology of relevant documentary evidence



<b>Time (LA)</b>	<b>Event</b>	<b>Trial Bundle ref</b>	<b>Comments</b>
<b>Tuesday 15 December 2015</b>			
18:26	Text from Amber Heard ("AH") to Connell Cowan: <i>Hey there. Any way you could see me earlier on thurs?</i>	File 9, Tab 114 page K122	Time zone recalculated
20:00	Text from AH to Connell Cowan: <i>emergency can you please call me?</i>	File 9, Tab 114 page K122	Time zone recalculated
22:05	Text from Connell Cowan to AH: <i>11a Thursday? Or tomorrow same time. Tried to reach you by phone earlier. Hope you're ok.</i>	File 7, Tab 13(a), page H81.1	Time zone recalculated
23:39	Text from Erin Boreum to AH: <i>I love you</i>	File 2.1, Tab 71.3, page E606.67	Time zone recalculated
23:52	Text from AH to Jodi Gottlieb: <i>I had an accident tonight Jodi. I'm really bruised and might have a black eye or two tmrw - same with my nose. Nurse on the way to make sure I don't have a concussion. There's a chance I might not be fit for tomorrow. But won't know how bad the bruising is until the morning. Giving you a heads up. I'll call you tmrw to let you know- k?</i>	File 2, Tab 60, page E76	
23:58	Text from AH to Erin Boreum <i>Thank you. I'm so freaked out</i>	File 2.1, Tab 71.3, page E606.67	Time zone recalculated
<b>Wednesday 16 December 2015</b>			
00:00	Text from Erin Boreum to AH: <i>I'm sure. I don't even know all the details but it sounds very scary. Did Xanax help at all?</i>	File 2.1, Tab 71.3, page E606.67	Time zone recalculated
00:01	Text from AH to Erin Boreum: <i>I need stronger Xanax for it to help. And j took all I had left so I only half of what I need to talk double of to feel anything . Ambien is the only thing that will put me down I think. But I'm also short on that.</i>	File 2.1, Tab 71.3, page E606.67	Time zone recalculated





Time (LA)	Event	Trial Bundle ref	Comments
00:03	Text from AH to Connell Cowan: <i>Johnny did a number on me tonight. I'm safe and with my support tonight but need some real help. Can I come tomorrow. I called earlier because I thought I had a concussion and didn't know if I should have called police. But I have a nurse close to me – and rocky and her have been here for me. Can I see you tmrw</i>	File 7, Tab 13(a), page H81.1;  File 9, Tab 133, page K278	Time zone recalculated
00:04	Text from Erin Boreum to AH: <i>Shit. Do you have any for tonight? And I can visit and refill tomorrow?</i>	File 2.1, Tab 71.3, page E606.67	Time zone recalculated
00:04	Text from AH to Erin Boreum: <i>Tmrw is fine I think I'm okay for tonight I took more Advil – is that okay?</i>	File 2.1, Tab 71.3, page E606.67	Time zone recalculated
00:06	Text from Erin Boreum to AH: <i>Yes to Advil. Applying ice again once more before bed would be ideal if you can tolerate it. I'm really so sorry you are going through this.</i>	File 2.1, Tab 71.3, page E606.67	Time zone recalculated
00:06	Text from AH to Erin Boreum: <i>just found a bunch of Coke Which explains it</i>	File 2.1, Tab 71.3, page E606.67	Time zone recalculated
00:08 – 00:09	Text from Erin Boreum to AH: <i>assume you're not referring to soda....</i>  Text from AH to Erin Boreum: <i>Ha. Goddamn those sugars!</i>	File 2.1, Tab 71.3, page E606.67	Time zone recalculated
00:10	Text from Erin Boreum to AH: <i>Do you want me to check in on him? I assume he was not the one getting hurt , but just wanted to check what you want. PS don't do the Coke. I heard it's bad for you.</i>	File 2.1, Tab 71.3, page E606.67	Time zone recalculated
00:25	Text from AH to Erin Boreum: <i>Pls don't check on him I'm fine</i>	File 2.1, Tab 71.3, page E606.67	Time zone recalculated
00:29	Text from Erin Boreum to AH: <i>I will not</i>	File 2.1, Tab 71.3, page E606.67	Time zone recalculated



Time (LA)	Event	Trial Bundle ref	Comments
00:30	Text from Erin Boreum to AH: <i>I'm glad you're ok, but I'd feel better if I checked you out at some point. Can I visit tomorrow or are you busy?</i>	File 2.1, Tab 71.3, page E606.68	Time zone recalculated
00:44 – 00:56	Text from AH to iO Tillet Wright: <i>I need you. J beat me up pretty good. Rocks on the couch with me now. When r u back. I'm hurt. Don't know what to do. Need you.</i>	File 7, Tab 14, page H82: screenshots showing time as 12:44am  File 7, Tab 17, page H104: messages showing time as 03:44 – 03:56	Time zone recalculated
01:00	Email from AH to Jodi Gottlieb: <i>I had a bad accident tonight Jodi. I'm really bruised and might have a black eye or two tmrw – same with my nose. Nurse on the way to make sure I don't have a concussion. There's a chance I might not be fit for tomorrow. But won't know how bad the bruising is until the morning. Giving you a heads up. I'll call you tmrw to let you know- k?</i>	File 8, Tab 78(a), page I28.1	
01:21	Text from Jodi Gottlieb to AH: <i>Oh no!!! Are you ok?! That sounds terrible. Sending you love.</i>	File 2, Tab 60, page E76	
02:49	Email from AH to Jessica Kovacevic Assistant: <i>I had an accident tonight Jessica. I'm really bruised and might have a black eye or two tmrw – same with my nose. Nurse on the way to make sure I don't have a concussion. There's a chance I might not be fit for tomorrow. But won't know how bad the bruising is until the morning. Giving you a heads up. I'll call you tmrw to let you know-k? Can we push to my morning stunt appt to the next morning perhaps ??</i>	File 7, Tab 78(a), page I28.2	
04:36 – 05:03	Text from iO Tillet Wright to AH: <i>WHAT Fuck no. I'm back tomorrow for eight hours and Saturday night for a few days. What the fuck happened?! Are you ok?? I'm there as soon as I can be. As soon as you see this tell me how you are and that you're safe. I'm flipping out.</i>	File 7, Tab 17, page H104	Time zone recalculated
9:12	Text from Connell Cowan to AH: <i>So sorry Amber. Come over today at 11a.</i>	File 7, Tab 13(a), page H81.1	Time zone recalculated
10:11	Text from Raquel Pennington to Carly Kuhn and AH: <i>Hey girl, so sorry, amber had a shit day yesterday and we were doing some emotional damage control. I'll cal you later??</i>	File 7, Tab 16, page H103	Time zone recalculated



Time (LA)	Event	Trial Bundle ref	Comments
10:41		File 6, Tab 148(c), pages F894.095 (without metadata) and F894.095A (with metadata)	
		File 6, Tab 148(c), page F894.101 (without metadata) and F894.101A (with metadata)	
10:56		File 6, Tab 148(c), page F894.122 (without metadata) and F894.122A (with metadata)	

Time (LA)	Event	Trial Bundle ref	Comments
10:57		File 6, Tab 148(c), page F894.099 (without metadata) and F894.099A (with metadata)	
10:58		File 6, Tab 148(c), page F894.097 (without metadata) and F894.097A (with metadata)	
11:03 – 11:27	<p>Texts between AH and Kevin Murphy:</p> <p>AH: <i>Hey there, I just wanted to let you know that the maids will be needed down town today, even though Johnny didn't sleep your last night. He left quite a dent on the place before he left</i></p> <p>KM: <i>OK</i></p> <p>KM: <i>Have them there by 1</i></p> <p>AH: <i>Thank you</i></p>	File 7, Tab 15, page H102	Time zone recalculated

Time (LA)	Event	Trial Bundle ref	Comments
11:44		File 6, Tab 148(c), page F894.118 (without metadata) and F894.118A (with metadata)	
		File 6, Tab 148(c), page F894.120 (without metadata) and F894.120A (with metadata)	
12:33	Text from Erin Boreum to AH: <i>Hi. Just checking on you. I'm really glad you got some sleep last night. Do you feel well enough to make your appearance today? Please don't push yourself if you are hurting. Also, please stick with ibuprofen every 4-6 hours today to decrease pain and swelling.</i>	File 2.1, Tab 71.3, page E606.68	Time zone recalculated
12:49	Text from iO Tillet Wright to AH: <i>Hey baby. I spoke to Rock. I'm trying to get my fight changed so I can come back tonight and come be with you.</i>	File 7, Tab 17, page H104	Time zone recalculated
13:08	Text from Erin Boreum to AH: <i>When can I visit today? I can refill your meds, too. I just called in more Xanax for you.</i>	File 2.1, Tab 71.3, page E606.68	Time zone recalculated

Time (LA)	Event	Trial Bundle ref	Comments
13:20	Text from AH to Erin Boreum: <i>can you come over today? Also my anxiety is through the roof</i>	File 2.1, Tab 71.3, page E606.68	Time zone recalculated
13:41	Text from iO Tillet Wright to AH: <i>I get in at 11. Gonna call you in a second.</i>	File 7, Tab 17, page H104	Time zone recalculated
13:45	Text from Erin Boreum to AH: <i>Yes I was planning on making it by at some point. Do you still have PRN propranolol? If so, take that. Will help decrease your anxiety without snowing you.</i>	File 2.1, Tab 71.3, page E606.68	Time zone recalculated
13:46	Text from AH to Erin Boreum: <i>I just took propranolol</i>	File 2.1, Tab 71.3, page E606.68	Time zone recalculated
13:47	Text from AH to Erin Boerum <i>Getting hair and makeup from 2-4 at the penthouse for the late show appearance</i>	File 2.1, Tab 71.3, page E606.68	Time zone recalculated
13:49	Text from Erin Boreum to AH: <i>OK, good. Propranolol should start working within 30 minutes. Do you want me to try to get there before 4:00 or come after your appearance?</i>	File 2.1, Tab 71.3, page E606.68	Time zone recalculated
13:53	Text from Erin Boreum to AH: <i>If you want, I can get on the road in about 20 minutes so I could get downtown around 3</i>	File 2.1, Tab 71.3, page E606.68	Time zone recalculated
13:56	Text from AH to Erin Boreum: <i>I won't be able to talk in front of hair and makeup so maybe can you come after ?</i>	File 2.1, Tab 71.3, page E606.68	Time zone recalculated
13:59	Text from Erin Boreum to AH: <i>Around what time do you think you'll be home? I have an overnight shift tonight but can come before</i>	File 2.1, Tab 71.3, page E606.68	Time zone recalculated
13:59	Text from AH to Erin Boreum: <i>I think about 6:30 or so</i>	File 2.1, Tab 71.3, page E606.68	Time zone recalculated
14:13	Text from Kevin Murphy to AH: <i>I'm here</i>	File 7, Tab 15, page H102	Time zone recalculated
14:16	Text from Erin Boreum to AH: <i>Ok want to keep me posted when you're done? Do you have enough meds for this afternoon?</i>	File 2.1, Tab 71.3, page E606.68	Time zone recalculated
14:56	Text from Erin Boreum to AH; <i>Heyh Just a thought Are you still seeing Cowan? If so, can you get in a session with him?</i>	File 2.1, Tab 71.3, page E606.68	Time zone recalculated
14:32	Text from iO Tillet Wright to AH: <i>Listen. This is a horror, what you're in right now. I can only Imagine how violated you feel. But you are safe, and you will continue to be safe. we have your back so hard. Your</i>	File 7, Tab 17, page H105	Time zone recalculated

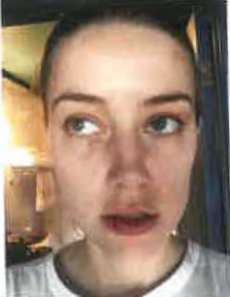

Time (LA)	Event	Trial Bundle ref	Comments
	<p><i>life is not falling apart, your world is not disintegrating. We are going to get you through this and you're going to come out stronger and healthier on the other side. And I'll be god damned if anyone is ever going to hurt you again. We'll take it one breath at a time, but every breath you've got is a tiny gift to me and your loved ones. Don't you forget that. I love you.</i></p>		
14:39		File 6, Tab 148(c), page F894.103 (without metadata) and F894.103A (with metadata)	
		File 6, Tab 148(c), page F894.105 (without metadata) and F894.105A (with metadata)	


Time (LA)	Event	Trial Bundle ref	Comments
14:40		<p>File 6, Tab 148(c), page F894.107 (without metadata) and F894.107A (with metadata)</p>	
		<p>File 6, Tab 148(c), page F894.109 (without metadata) and F894.109A (with metadata)</p>	






Appendix 3 to Defendants' closing submissions

Time (LA)	Event	Trial Bundle ref	Comments
		<p>File 6, Tab 148(c), page F894.112 (without metadata) and F894.112A (with metadata)</p>	
		<p>File 6, Tab 148(c), page F894.111 (with metadata)</p>	

Time (LA)	Event	Trial Bundle ref	Comments
14:41		<p>File 6, Tab 148(c), page F894.114 (without metadata) and F894.114A (with metadata)</p>	
		<p>File 6, Tab 148(c), page F894.116 (without metadata) and F894.116A (with metadata)</p>	



Time (LA)	Event	Trial Bundle ref	Comments
		<p>File 6, Tab 148(c), page F894.124 (without metadata) and F894.124A (with metadata)</p>	
<p>14:59 – 15:00</p>	<p>AH texts Connell Cowan: <i>Connell, sorry haven't called because rocky came over last night. Then dealt with Securitiy and called nurse for medical help and went down to sleep. Today has been filled with work (I'm shooting a late show appearance today – with 2 black eyes) In short? I need your help. But will have time tomorrow to get it. Can you please please make time for me??</i></p> <p><i>Johnny beat me up pretty good last night</i></p> <p><i>He's using again</i></p>	<p>File 7, Tab 13(a), page H81.1</p> <p>File 9, Tab 133, page K278</p>	<p>Time zone recalculated</p>
<p>15:02</p>	<p>Connell Cowan texts AH: <i>tomorrow 11am?</i></p>	<p>File 7, Tab 13(a), page H81.1</p>	<p>Time zone recalculated</p>
<p>15:02</p>	<p>AH texts iO Tillet Wright: <i>I love you</i></p>	<p>File 7, Tab 17, page H105</p>	<p>Time zone recalculated</p>
<p>16:03</p>	<p>Pictures taken by Kevin Murphy:</p>	<p>File 9, Tab 87(k), page J1.10</p>	

Time (LA)	Event	Trial Bundle ref	Comments
			
		<p>File 9, Tab 87(1), page J1.11</p>	

Time (LA)	Event	Trial Bundle ref	Comments
		File 9, Tab 87(m), page J1.12	
16:03	AH texts Erin Boreum: <i>Yes</i>	File 2.1, Tab 71.3, page E606.68	Time zone recalculated
16:08	Erin Boreum texts AH; <i>Great. Please let me know when you schedule it. Did the propranolol help?</i>	File 2.1, Tab 71.3, page E606.68	Time zone recalculated
16:20	AH texts Connell Cowan: <i>Yes, I'll come then. Maybe a few mins early if possible. I have to leave by 12: latest</i>	File 7, Tab 13(a), page H81.1	Time zone recalculated
16:21	Connell Cowan texts AH: <i>So come at 10:30. Will give us two hours.</i>	File 7, Tab 13(a), page H81.1	Time zone recalculated
17:22	iO Tillet Wright texts AH: <i>You got this boo</i>	File 7, Tab 17, page H105	Time zone recalculated





Time (LA)	Event	Trial Bundle ref	Comments
<p><i>Time unknown</i></p>	<p>Filming of <i>The Late Late Show with James Corden</i></p> 	<p>Video clip is in Multimedia files (Core Bundle), "F150. Amber Heard has a Ballet Claw – Late Late Show CBS.mp4".</p> <p>Still image: File 9, Tab 87(n), page J1.14</p>	
		<p>Still image: File 9, Tab 87(n), page J1.13</p>	
<p><i>Time unknown</i></p>	<p>Texts between Lily-Rose Depp and AH:</p>	<p>File 4, Tab 121, pages F719 – F720</p>	


Time (LA)	Event	Trial Bundle ref	Comments
	<p>AH: <i>So, here's the thing mini balls... I might not be able to go to the island for Christmas this year with you guys!! I might have to be with my family instead... (Long story I won't bore you with right now) so I'm worried that I won't get to see you and meet your man! Maybe I can see you guys soon? I'm dying to see your face! I miss you so much</i></p> <p>L-RD: <i>oh no!! how come?? Is everything okay??</i>  <i>And yes of course!! We can come down tomorrow morning and hang if u want??</i></p>		
20:22	<p>Texts between Lily-Rose Depp and AH:</p> <p>AH: <i>Yeah, don't worry sweet thing. I'd love to see you tmrw though! I'm free in the afternoon... Are you busy then?</i></p> <p>L-RD: <i>I have a dinner at 7! How early are you free??</i></p>	File 4, Tab 121, pages F719 – F720	
21:58 – 22:26	<p>Texts between AH and Erin Boerum</p> <p>EB: <i>You still need meds tonight? I've got a few weeks and PRNs for you. I can drop at Eastern but cannot stay long</i></p> <p>AH: <i>I don't know if I have Xanax I'm so sad</i></p> <p>EB: <i>I know. I'm so sorry. Not a good situation</i></p> <p>AH: <i>If you're working tonight I'll just take ambien tonight</i></p> <p>EB: <i>It's up to you sweetie. I've got meds in my car and I'm more than happy to drop them off, just can't stay and chat like I wish I could but at least you'll have them. And I am available by phone for the next hour, too. Or would you rather me meet you tomorrow? Whatever works best for you. I am on my way because I'd rather you have the meds you need tonight</i></p>	File 7, Tab 19(a), page H127.1	Time zone converted

Time (LA)	Event	Trial Bundle ref	Comments
<i>Time unknown</i>	<b>12/16/15:</b> Ct contacts RN via phone and states she had an argument with husband JD previous night. Ct states husband JD has left home and she is unaware of his location. Client reports getting into verbal disagreement with husband at their home in downtown LA. She states husband JD was inebriated. Ct states the disagreement escalated and states husband JD used his forehead to hit her head. Ct denies loss of consciousness. States she has headache and bruised eye. RN encouraged ct to notify Dr. Kipper and/or go to emergency room if she was injured or felt like she is in danger. Ct declined and stated friend Rocky is with her and that husband JD will not be able to reenter home.	File 4, Tab 139, page F880	
<b>Thursday 17 December 2015</b>			
00:05	Text from AH to Erin Boerum: <i>Thanks for the grub mom. I ❤️ you</i>	File 7, Tab 19(a), page H127.1	Time zone recalculated
00:40	AH texts eight photographs of her injuries to iO Tillet Wright and Raquel Pennington	File 7, Tab 18, pages H106 – H115	Time zone recalculated
00:46		File 6, Tab 148(c), page F894.132 (without metadata) and F894.132A (with metadata)	
		File 6, Tab 148(c), page F894.134 (without metadata) and F894.134A (with metadata)	



Appendix 3 to Defendants' closing submissions

Time (LA)	Event	Trial Bundle ref	Comments
		File 6, Tab 148(c), page F894.136 (without metadata) and F894.136A (with metadata)	
		File 6, Tab 148(c), page F894.139 (without metadata) and F894.139A (with metadata)	
09:52	Text from Erin Boreum to AH: <i>Did you sleep?</i>	File 7, Tab 19(a), page H127.1	Time zone recalculated
10:19		File 6, Tab 148(c), page F894.141 (without metadata) and F894.141A (with metadata)	
		File 6, Tab 148(c), page F894.143 (without metadata) and F894.143A (with metadata)	

Time (LA)	Event	Trial Bundle ref	Comments
10:20		File 6, Tab 148(c), page F894.145 (without metadata) and F894.145A (with metadata)	
Time unknown	Connell Cowan notes of psychotherapy session with AH: <i>"New Issues: altercation with JD.</i> ... <i>Risk Assessment: ... Some spark ignited an argument that escalated and got violent. Shoving and screaming. Amber related that he started the physicality – pushed her down. Amber got back up. Hard for her to de-escalate a fight. Her strategy (despite our conversations) is to try and fight back (not protective of self and very self-defeating)."</i>	File 9, Tab 133, page K277	
10:40 – 10:49	Texts between AH and Erin Boerum:  AH: <i>Yes The Indian helped a lot! Thank you so much for coming over last night. I know you were busy so I really appreciate you doing that. It meant a lot to me</i>  EB: <i>Those good old Indians. Working their Indian magic on sleep. And...I love you. I'm glad Rocky and io can be there. You've got a really good support system.</i>	File 7, Tab 19(a), page H127.1	Time zone recalculated
12:33	Text from AH to Lily-Rose Depp: <i>I'm free around 4:30!</i>	File 4, Tab 121, page F720	
12:35 – 17:54	Text messages between Paige Heard and AH:  PH: <i>I can be there tomorrow</i>  AH sends three photographs  PH: <i>Yes send the pictures and nothing else I love you so damned much. I will do absolutely anything for you</i>	File 7, tab 19, H116-H118	Time zone recalculated

Time (LA)	Event	Trial Bundle ref	Comments
	<p><i>Your dad sent Steve a scathing text message. I'm sorry – I told him he should have asked you but you know men on men anger. He really reamed him. He compared you to Lily Rose and how JD would feel. Your dad's blood is boiling.</i></p> <p>AH: <i>Did dad see the pictures?</i></p> <p>PH: <i>Yep, he went through my messages to you. His email was very good and I will sent it as soon as his phone finishes its update. It is a good reaction and JD immediately texted back "David....."</i></p> <p>PH sends five photographs</p> <p>PH: <i>Amber – David sent NONE of these pictures</i></p> <p>AH: <i>Huh?</i></p> <p>PH: <i>He saw the pics on my phone. Send 2 or 3 that I'll forward from his phone</i></p> <p>AH: <i>What?!</i></p> <p>PH: <i>David saw the pics on my phone and made reference to them on his text.</i></p> <p>AH: <i>Can you please send me Johnny's response?</i></p> <p>PH: <i>It will all be okay, my baby. I promise.</i></p> <p>AH: <i>Did he send that long bullshit text message to dad after before he saw the pictures?</i></p> <p>PH: <i>He (dad) said he's done for the night. But the text was first</i></p> <p>AH: <i>So he sent pics to johnny though right?</i></p> <p>PH: <i>Right</i></p>		

Time (LA)	Event	Trial Bundle ref	Comments
	<p>AH: <i>Jesus I just read that long text message... Can't believe how crazy he sounds. Nail polish?! What the fuck is he talking about?! He sounds out of his mind...</i></p> <p>PH: <i>Which one?</i></p> <p>AH: <i>What?</i> <i>Look, please stop engaging with him. He's clearly still using and is ramping up and out of his mind.</i></p> <p>PH: <i>Sure – I'll pass that on to your dad. Let me know when you'd like me to come. I promise I won't bug you.</i></p> <p>AH: <i>I can't believe he's still justifying it to himself</i> <i>I can't believe his so disillusioned to say those things</i> <i>Did he see the pictures!?</i></p> <p>PH: <i>Don't know. He's signed over and out</i></p> <p>AH: <i>What?</i></p> <p>PH: <i>He said "maybe" we'll talk later.</i></p> <p>AH: <i>Who?</i> <i>I'm so confused</i></p> <p>PH: <i>Of course, consider the source. JD texted back but also said talk to you tomorrow.</i></p> <p>AH: <i>I'm confused. J texted back after he saw the photos?</i></p> <p>PH: <i>Honey, too many people texting on too many phones. Let me know when you want me to come. I promise, you will be all right</i></p>		
13:07	Raquel Pennington texts AH:	File 7, tab 13, H55	


Time (LA)	Event	Trial Bundle ref	Comments
	<i>Hey there, papa heard called me, I let it go to voicemail. I assume you told him some of what happened, but I just wanted to check with you before I call him back to make sure I'm supporting what you want to divulge.</i>		
13:08	AH texts Raquel Pennington: <i>I told him a little – Just wanting him xmas might be off I jus don't want him to drive out!</i>  Raquel Pennington texts AH: <i>Right! Do you still want them to come out?</i>	File 7, tab 13, H55-H56	
13:10	Raquel Pennington texts AH:  <i>OK well I'll call him back and just reassure him that guns are not necessary at the present moment</i>	File 7, tab 13, H56	
13:30 – 15:26	Texts between AH and Erin Boerum:  EB: <i>I just finished watching your appearance last night. I had recorded it. You looked and sounded great, and honestly nothing looked wrong at all.</i>  AH: <i>that's a miracle</i>  AH: <i>Hey I have had a headache basically for the last couple of days and I've bene taking Advil nonstop... my head is still really bruised. I still feel a lot of welts on it. I called Kipper's office and Lisa said he was away until tomorrow but that Monroe could look at me. Do you think I should go and get checked out by him?</i>  EB: <i>I think if you are still hurting at this point then it wouldn't hurt to get a full check up/ assessment. Monroe is really good guy and very smart nurse practitioner. Are the headaches picking you up when you're sleeping?</i>	File 7, Tab 19(a), page H127.1 - .2	Time zone recalculated
16:32	AH texts Raquel Pennington: <i>Will you send a pic of my hair/head to my dad right now</i>	File 7, tab 13, H56	

Time (LA)	Event	Trial Bundle ref	Comments
17:39	Raquel Pennington texts AH: <i>The ones we took this morning? It's on your phone I have the ones from yesterday though I spoke to both of your parents today</i>	File 7, tab 13, H56	
17:40	Raquel Pennington texts AH: <i>Surprisingly, your mom was the more claim of the two</i>	File 7, tab 13, H56	
17:41	Raquel Pennington texts AH: <i>How are you? I'll be home at 9:40</i>	File 7, tab 13, H56	
<i>Time unknown</i>	AH attends Dr Kipper's office and is seen by Monroe Tinker:  <b>Phone Consultation: head ache</b>  HPI: Ms. Amber Heard is a 29-year-old English speaking Caucasian female with a past medical history of insomnia, anxiety and attention deficit disorder. Today the patient reports a head ache after she bumped her head while standing up 2 days ago. The patient reports no loss of consciousness, no nausea or vomiting. No change in mental status, or vision changes. Last seen in the office on 12/23/2015 the patient has not experienced any cardiovascular events. Symptomatically she denies chest pain or dyspnea, PND, orthopnea and ankle edema she denies palpitations, syncope or pre-syncope.	File 9, Tab 117, page K130	

Time (LA)	Event	Trial Bundle ref	Comments
	<p>The above notes should be read alongside Amber Heard's text message to Lisa Beane on 30 May 2016 (File 7, Tab 45(a), page H178.1) in which Amber Heard states:</p> <p><i>"... Listen, a few months ago remember when you saw my face and so kindly follow me out to the car after I left the office to offer your advice and support? ... Well as you may or may not have seen in the recent media news, now is the time when I could really use some. That time when I came in to the office, it was because of my injuries, but obviously I couldn't say that to Monroe (who saw me because Dr. Kipper was out of the office at that moment). Well, now, I am being called a liar and I'm wondering if there's anyway I could get access to that particular medical evaluation ?? Even though he didn't know what caused it, I need to prove that I had certain injuries etc...."</i></p>		
18:08 – 20:07	<p>Texts between AH and Erin Boerum:</p> <p>EB: <i>Are you ok?? Did you go to the office?</i></p> <p>AH: <i>Yes I did I saw Monroe. And went to therapists and lawyers office today. Just really sad.</i></p> <p>EB: <i>Good. All good things to take care of yourself which is what you should be doing. I know it's not easy, but I'm proud of you for taking care of number one. Have you been able to eat at all?</i></p>	File 7, Tab 19(a), page H127.1 - .2	Time zone recalculated
20:54	<p>Texts between AH and Lily-Rose Depp:</p> <p>L-RD: <i>fuck I just saw your text! Sorry Ladyballs! Are you for sure not coming to the island??</i></p> <p>AH: <i>It's okay! No worries</i></p>	File 4, Tab 121, page F720	

Time (LA)	Event	Trial Bundle ref	Comments
23:00	<p><b>12/17/15: (23:00)</b> RN in contact with ct to notify her that she would be able to deliver medications to her home. RN waited at door for several minutes after knocking . Ct greeted RN at door looking disheveled. Hair appeared unbrushed. Ct appeared weepy and sad. Posture is slouched. Ct told RN about argument with husband. RN offered emotional support but reminded ct that RN could not stay as was on duty with another client and was only visiting in order to deliver medication. Per ct, she has not had contact with husband since altercation. Ct had visible bright red blood appearing at center of lower lip. When RN made client aware that she actively bleeding on her lip, ct stated it was from the injury sustained in the <b>Client: Amber Heard Depp</b>  <b>RN: Eria Boerum</b></p> <p>argument between her and her husband, and that it continues to bleed actively. Ct also states that her head is bruised and that she lost clumps of hair in altercation. RN briefly looked at ct's scalp but was unable to visualize the hematomas ct had described. RN encouraged ct to be seen by physician Dr. Kipper or go to emergency/Urgent care for thorough assessment. Ct states she will contact Dr. Kipper tomorrow. Ct is supported by friends Rocky and iO, who will be staying in ct's home with her. RN reminds ct to hydrate with oral fluids and to limit/abstain from alcohol. Ct was consuming red wine with RN left but assured RN she would consume in moderation. RN left and will follow up with ct tomorrow and will notify Dr. Kipper.</p>	File 4, Tab 139, page F880 – 880.1	
<b>Friday 18 December 2015</b>			



Time (LA)	Event	Trial Bundle ref	Comments
14:40		File 6, Tab 148(c), page F894.147 (without metadata) and F894.147A (with metadata)	
17:08 – 18:54	<p>Text messages between AH and iO Tillet Wright:</p> <p>iO: <i>Hi How are you today? What did today bring?</i></p> <p>AH: <i>Hi Sad heart man I'm super sad but okay I guess</i></p> <p>iO: <i>What happened today and last night? You don't have to be ok</i></p> <p>AH: <i>Betty sue is in critical condition - Debbie text me to tell me. So I text him today "I heard about Betty sue, I'm so sorry, don't know what else to say but I hope you're okay"</i></p> <p>AH: <i>And he responded this:</i></p> <p>iO: <i>Wow That was very generous How did you feel when you got that?</i></p> <p>AH: <i>I don't know Weirdly relieved that he seemed sober and then disappointed I cared</i></p>	File 7, Tab 19(a), pages H128 – H129	

Time (LA)	Event	Trial Bundle ref	Comments
	<p><i>Also strongly hopeful although I'm not sure why.</i></p> <p>iO: <i>All sounds very natural to me</i> <i>Hopeful in what way</i></p> <p>AH: <i>I don't know</i> <i>Like he's still there</i> <i>Like it's he's not gone</i></p> <p>iO: <i>Ah</i></p> <p>AH: <i>But I'm talking myself out of allowing that feeling ya know?</i></p> <p>iO: <i>Well that also makes sense that you would hope that's the case.</i> <i>Yeah. That's good. Talk yourself out of it until you really understand it</i> <i>You are your only defense</i> <i>The good him is there. Just in percentage it's 30% good and 70% visitor, who has become a monster</i></p> <p>AH: <i>When r u back ?</i></p> <p>Io: <i>Tomorrow night</i> <i>You wanna have dinner?</i></p> <p>AH: <i>Tmrw?? Yes!</i> <i>My mom flies in tmrw also</i></p> <p>iO: <i>Amazing</i> <i>I'll let you know when we finish filming and I'm headed back</i></p>		
<p><i>Time unknown</i></p>	<p><b>12/18/15:</b> Ct states she went to Dr. Kipper's office and was assessed by NP Monroe T. as Dr. Kipper was out of the office.</p>	<p>File 4, Tab 139, page F880.1</p>	

Time (LA)	Event	Trial Bundle ref	Comments
<b>Saturday 19 December 2015</b>			
00:37	<p>Texts between AH and Lily-Rose Depp:</p> <p>AH: <i>Am I going to see you before you leave?</i></p> <p>L-RD: <i>I hope so!!!! I have to get some last minute Xmas presents tomorrow, would you wanna come with me???</i></p>	File 4, Tab 121, page F720	
12:21 – 13:27	<p>Texts between AH and Lily-Rose Depp:</p> <p>AH: <i>Would love to see you! When do you leave?</i></p> <p>L-RD: <i>I'm not sure. It's been super unclear. I think tomorrow. Are you okay??</i></p> <p>AH: <i>It's been hard. But I'll be okay. I'd really love to see you if possible before you leave, but no pressure!! I can always see you when you get back. Do you know if you'll have any time later tonight?? Also, is Ashe with you?</i></p> <p>L-RD: <i>I don't know if I'll be able to today because Miley invited me to her concert tonight and I think we're gonna go! But will you be around when I come back?? I miss you so much I hope you know I'm here for you – that will never change! Love you Ladybails</i></p> <p>AH: <i>Thanks mini. Back at cha. You and Ashe are going to the Miley concert?! Hahaha. When you come back from the island or concert?</i></p> <p>L-RD: <i>from the island!</i></p> <p>AH: <i>Ah! Yes. Of course. Actually Do you know if you'll be around tmrw during the day?? I leave town soon and won't be back when you guys get back... I'm headed to San Fran. And then Texas and then the uk! I start work in the beginning of the year there</i></p>	File 4, Tab 121, page F721 – F722	

Time (LA)	Event	Trial Bundle ref	Comments
	<p>L-RD: <i>not sure. Trying to find out now... I really wanna see you before you leave!!!</i></p> <p>AH: <i>Okay, no worries. Let me know and I'll make it work. Otherwise I'm sure I'll see you between trips! Love you</i></p>		
<i>Time unknown</i>	<p><b>12/19/15:</b> Ct states she is experiencing increased anxiety and insomnia. RN offers emotional support via text and also encourages ct to utilize relaxation techniques and deep breathing exercises to assist in decreasing anxiety. Ct states that attempts to use Xanax and propranolol have been ineffective in managing anxiety. Ct states that Provigil "is the only thing that has made me feel better" but that she immediately feels depressed and anxious when medication is not longer effective. Dr. Kipper notified, and ordered to increase Xanax to 0.5mg q4-6hr prn. Refill for Xanax and Ambien granted by Dr. Kipper. Ct continues to state that her anxiety is worsened by unknown status of relationship with her husband as he has not returned home or contacted her since their argument several days ago. RN encouraged ct to continue to hydrate, eat small meals, and utilize support of friends and to continue seeing therapist Dr. Cowan. RN reminded ct that RN is out of town until Dec. 29 and to contact Dr. Kipper's office directly for any needs while RN is away. Ct verbalizes understanding.</p>	File 4, Tab 139, page F880.1	
<b>Sunday 20 December 2015</b>			
18:21 – 18:22	<p>Text from Raquel Pennington to AH: <i>Let me know how I can help</i> <i>I can occupy your mama or be in the next room, or butt out</i></p>	File 7, Tab 13, page H57	
18:24 – 18:26	<p>Texts between AH and Raquel Pennington:</p> <p>AH: <i>I'll let you know. I'm textin with him now about what's best. Talk when he gets here vs. when he's leaving</i> <i>I hate that I wish he wasn't leaving</i> <i>I feel abandoned by someone who should be crawling back to apologize to ME!</i> <i>I feel so ashamed</i></p>	File 7, tab 13, pages H57-H58	

Time (LA)	Event	Trial Bundle ref	Comments
	RP: <i>You have nothing to be ashamed about. Nothing Love comes from the heart, from the gut. It has nothing to do with the brain</i>		
19:29 – 19:30	<p>Texts between AH and Raquel Pennington:</p> <p>RP: <i>By the way, I'm not near the end of ability to support you. Not even close, none of us are. So the second you need something, no matter how dramatic and crazy, I am here. Josh is here. Leola is here. No judgment. Just love.</i></p> <p>AH: <i>Ok</i> <i>Thanks</i> <i>We are about to talk</i></p> <p>RP: <i>Ok</i> <i>If it even looks like it may get escalated just walk away. That's not defeat. You can pick it up another time.</i></p>	File 7, tab 13, H58-H59	
19:35 – 19:36	<p>Texts from AH to Connell Cowan:</p> <p><i>I don't feel strong enough</i> <i>I want to be</i> <i>Just don't feel it</i> <i>He wants to say bye to me. He came over to grab some things I just don't want him to leave</i> <i>I don't know what to do</i></p>	File 7, Tab 20(a), page H129.1	Time zone recalculated
19:49	<p>Text from Connell Cowan to AH:</p> <p><i>All I can tell you Amber is that it's important to trust what you know to be safe and healthy for you and to distrust any of those feelings that come from fear and insecurity. Whatever you decide, whatever you do, make sure you try and let it come from strength, not weakness. I know you don't want him to go but staying and using leads to what??</i></p>	File 7, Tab 20(a), page H129.1	Time zone recalculated
20:21	<p>Text from Connell Cowan to AH:</p> <p><i>Let me know what time you have tomorrow to talk</i></p>	File 7, Tab 20(a), page H129.1.	Time zone recalculated
21:09 – 23:14	<p>Texts between AH and Raquel Pennington:</p> <p>AH: <i>Okay</i></p>	File 7, Tab 20(b), H129.2 H129.3	

Time (LA)	Event	Trial Bundle ref	Comments
	<p><i>Handing it so far I think</i></p> <p>RP: <i>Ok</i>  <i>Thank you so much for checking in</i>  <i>Is there a certain time I should check in with you?</i></p> <p>AH: <i>I'll text you in a bit</i></p> <p>RP: <i>OK</i></p> <p>AH: <i>I'm being strong – basically faking it</i></p> <p>RP: <i>survival</i></p> <p>AH: <i>I said "you head butted me" and his response? I just gave you a little knock!"</i>  <i>"With my head"</i>  <i>And then left the room after saying what a "fuck up" he was and such</i>  <i>Fucking feeling sorry for himself</i>  <i>poor him</i></p> <p>RP: <i>Omg</i></p> <p>AH: <i>Can't take any responsibility</i></p> <p>RP: <i>Does that make it a little easier?</i></p> <p>AH: <i>Just like josh said</i>  <i>He doesn't know how</i>  <i>Are you sure you guys are okay not going to the island??</i>  <i>I feel terrible for ruining cams</i>  <i>*xmas</i></p> <p>RP: <i>You didn't ruin it!</i></p>	<p>Read with additional text messages in File 7, Tab 13, pages H57 – H63</p>	

Time (LA)	Event	Trial Bundle ref	Comments
	<p><i>Christmas is going to happen many more times. And home is where you and our moms are I love you so much. You are the strongest person I know.</i></p> <p>AH: <i>He's crying</i>  <i>Now playing the sorry I fucked up and am so fucked up card</i></p> <p>RP: <i>Yes, because he's losing you for real</i>  <i>Because he knows you mean it.</i>  <i>This means you are communicating clearly. Keep going. Do not let him stay there tonight. Speak from strength, not from desperation. Listen to what your gut says will serve your strength.</i></p> <p>AH: <i>Can I come over? Or are you guys in bed?</i></p> <p>RP: <i>Nope not at all come over</i></p> <p>AH: <i>Okay. I might come over in a min.</i></p> <p>RP: <i>Ok, door is open</i>  <i>We are upstairs just watching tv</i>  <i>Preserve!</i></p> <p>AH: <i>I am</i>  <i>But I'm heart broken</i>  <i>My heart feels broken</i></p> <p>RP: <i>I know.</i></p> <p>AH: <i>I am so sad</i></p> <p>RP: <i>It's the saddest thing.</i>  <i>It's ok to feel that.</i>  <i>It's ok</i></p>		

Time (LA)	Event	Trial Bundle ref	Comments
	<p>AH: <i>I feel so much</i></p> <p>RP: <i>Feel it. This is real. This is your preservation kicking in Do you want to come over? I can wait with your moma</i></p> <p>AH: <i>its okay</i> <i>He's leaving soon</i></p> <p>RP: <i>[heart]</i> <i>I'm here</i></p> <p>RP: <i>You still ok?</i></p>		
<b>Monday 21 December 2015</b>			
01:31 – 04:52	<p>Texts between AH and Raquel Pennington:</p> <p>AH: <i>I'm ok</i> <i>Just been a hard night.</i> <i>Crying</i> <i>And talking</i> <i>And crying more</i></p> <p>RP: <i>Oh Amber, I wish there was anything I could do to make this load not as heavy Thank you for responding. I was dreaming about you. I was worried. Are you ok?</i> <i>I think Johnny just came in and left a note on my floor</i></p> <p>AH: <i>He's fucked up</i></p> <p>RP: <i>Yes obviously</i></p>	<p>File 7, tab 20(c), pp.H129.6-7</p> <p>Read with additional text messages in File 7, Tab 13, pages H63 -</p>	









Time (LA)	Event	Trial Bundle ref	Comments
	<p>AH: <i>I asked him to leave ignore it</i>  <i>He's gone</i>  <i>I'm so sorry</i>  <i>He's just feeling like he's fucked up</i></p> <p>RP: <i>No need to apologize it's not your fault</i></p> <p>AH: <i>I asked him to leave twice</i></p> <p>RP: <i>I saw Steven in the hallway, can he help?</i>  <i>Can we help?</i></p> <p>AH: <i>I don't know</i>  <i>He's not with me</i>  <i>He's drink</i>  <i>*drunk</i></p> <p>RP: <i>Can you get out of there?</i>  <i>Can I come get you and we will go?</i>  <i>If he won't leave?</i>  <i>Is he gone?</i>  <i>Come I come help you?</i>  <i>I feel stupid giving you space. I feel like coming to help you, even if it's just standing there as witness</i></p> <p>AH: <i>it's ok</i></p> <p>RP: <i>I'm so worried</i></p> <p>AH: <i>It's okay. He's sleeping here tonight because he started throwing up</i></p> <p>RP: <i>Ok</i></p>		




Time (LA)	Event	Trial Bundle ref	Comments
	<p>AH: <i>I'm so soar</i></p> <p>RP: <i>Can you go be with your mama?</i></p> <p>AH: <i>*sad</i>  <i>I have nmbeen thinking about it</i>  <i>*been</i>  <i>But it will antagonize</i></p> <p>RP: <i>Just try to get some rest and you can get back to solving problems tomorrow</i>  <i>Turn him on his stomach and go let your mom take care of you</i></p>		
10:30 – 10:32	<p>Text from Raquel Pennington to AH:  <i>I'm up</i>  <i>I just went to check on your mama, she was sound asleep</i>  <i>Do you think Kipper should be there when he wakes up?</i></p>	File 7, Tab 13, page H68	
12:44	<p>Text from David Heard to JD:  <i>JD I understand little more about what's going on then I did, I'm not mad I understand, a man has got to be a man and I'm not saying that you were completely justified but I understand I'm talking to Paige and I think I know what is going on a little better I wish you and I were talking. And I can tell you that I told you before I could fix this if I could sit down with you and Amber at the same time by ourselves and you would understand why I don't want to kill you could beat you up or anything, I would say no more hitting for anybody I think you and Amber Jack and Lily Rose only should go to the island for a few days and let me talk to Amber and tell her what she needs to stop doing to help your situation. I still love you like a brother or father or whatever and I think it could work things out, I think the whole thing about all the friends and everything is getting in the way but the main thing is that amber should never hit you or call you another name and same goes for you and if that were the case you guys could be happy together for the rest of your lives!!!! I mean that and I know that from the bottom of my heart I know that Amber needs help with her temper the same as you need help with your □problem with drugs and alcohol mixing together good causes you to lose control, even though it's not one- sided she's not blameless and I know that but she's my kid and I love her unconditionally but I think you do too!!!</i></p>	File 10, Tab 147(a), page O123	

Time (LA)	Event	Trial Bundle ref	Comments
13:36 – 13:37	<p>Text between AH and Raquel Pennington:</p> <p>AH: <i>I just woke up</i>  <i>Yeah</i>  <i>I'm going to text him</i></p> <p>RP: <i>I think that would be a good idea. When he wakes at least he will be sober, maybe slightly more receptive. He won't like it, but it may help?</i></p>		
20:38	<p>Texts between JD and Raquel Pennington:</p> <p>JD: <i>Dear Rocky... May I call you? Just want to straighten things out... Love you... Johnny</i></p> <p>JD: <i>Time is kinda of the essence... Sorry.</i></p> <p>RP: <i>I'm just not ready</i></p> <p>RP: <i>I'm sad and not ready</i></p> <p>JD: <i>You got it</i></p>	File 10, Tab 147(a), page O103	
<i>Time unknown</i>	<p><b>12/21/15:</b> RN received phone call from ct and husband JD. RN was confused regarding what client and husband were asking, and client AH told RN they were going to hang up. Client AH later texted RN and stated that she and husband JD had reconciled, but then argued about their argument last week. Ct plans to visit private island in Bahamas with husband JD x 1 week.</p>	File 4, Tab 139, page F880.1	
<b>Tuesday 22 December 2015</b>			
<i>Time unknown</i>	<p>AH texts Connell Cowan:</p> <p><i>I am so sorry if I worried you. As you can imagine, the day of travel (20<sup>th</sup>) he came over to "say goodbye" and there commenced an entire day of hashing it out.... Ultimately ending in his agreement to commit to the couples counselling etc... and my decision to go to the island with him and the kids. It's just us and has been relaxing and incredibly peaceful –</i></p>	File 9, Tab 133, page K281	

Time (LA)	Event	Trial Bundle ref	Comments
	<p><i>even if it is just avoiding an inevitable larger "discussion / conclusion". Anyway, sorry for the long text. I will text you when I get back to LA. I wish I could tell you I had had the ability to walk away but I just wasn't (although I certainly saw he believed I had) but anyway.... I will text you when I'm back on the 30<sup>th</sup>. Perhaps I need to rush on in there as soon as you open for the new year... Thank you for checking in, Connell. That means a lot to me.</i></p> <p>Connell Cowan records in his notes:  <i>This text was in response to a message I sent expressing concern. This is obviously a toxic and destructive relationship. Amber understands how damaged and damaging the relationship is and still refuses to move on.</i></p>		
13:49	<p>AH texts iO Tillet Wright:  <i>I wish I stronger, but I wasn't. or aren't. Im giving it another shot. I know Im stupid. Can't seem to be stronger than that though. At least at the moment</i>  <i>Lobe you</i>  <i>*love you. How's NY? How's dad and Nicole?</i></p>	File 7, Tab 20(d), page H129.10	Time zone recalculated
15:05 – 15:06	<p>iO Tillet Wright texts AH:  <i>Damn boo. I am concerned for your well being, mentally and physically. He doesn't deserve your forgiveness but I understand why you feel stuck in it. I wish you weren't there and were with the ones who truly love you for the holiday, but I won't drill it home more than that. I'm here when you need me.</i>  <i>Leo and I just got to New York. Headed to pops now for dinner and the fireplace.</i></p>	File 7, Tab 20(d), page H129.10	Time zone recalculated
<b>Wednesday 23 December 2015</b>			


Time (LA)	Event	Trial Bundle ref	Comments
19:22		File 6, tab 148(h), page F894.269	
		File 6, tab 148(h), page F894.270	
		File 6, tab 148(h), page F894.271	
<p><b>Saturday 26 December 2015</b></p>			


Time (LA)	Event	Trial Bundle ref	Comments
00:40		File 6, tab 148(h), page F894.272	
13:10		File 6, tab 148(h), page F894.267	
		File 6, tab 148(h), page F894.268	

Time (LA)	Event	Trial Bundle ref	Comments
16:10		File 6, tab 148(h), page F894.265	
		File 6, tab 148(i), page F894.273	
16:14		File 6, tab 148(h), F894.266	
<b>Tuesday 29 December 2015</b>			

Time (LA)	Event	Trial Bundle ref	Comments
09:17	Text from iO Tillet Wright to AH: <i>Hi. Are you alright? When are you home? What's the plan with you guys? How has j been?</i>	File 7, Tab 20(e), page H129.10	Time zone recalculated
10:19	Text from AH to iO Tillet Wright: <i>He's been great. Having the kids here it being so quiet has been great. I mean, there's always an upswing but we've talked a lot about the fight and over the course of those conversations, I feel he's starting to understand how bad he got and how much it affected me physically and emotionally. And Im not going to stop holding him accountable. Josh and Rocky made it clear to him by refusing to come to the island – and so did my parents (albeit in a different way), so he's had to really deal with knowing everyone is aware of what's going on.... He was in such denial about what he did. Especially the physical aspect.... I mean, for gods sake he had been telling himself I was faking that I was hurt because he "didn't really do much".... I mean, you know how delusional he can be. Im glad I'm getting a chance to reiterate that he really did damage this time so it never happens again. Sorry for the long tex. We're coming home tmrw or early on the 31<sup>st</sup>. where are you? Still in nyc?</i>	File 7, Tab 20(e), page H129.10	Time zone recalculated
10:23	Text from iO Tillet Wright to AH: <i>Good. Accountability is really good. I'm so happy you get to be quiet and that it's been peaceful and restful there. Im back in LA finally. I'm going to Joshua tree for NYE but I'll be back the 2<sup>nd</sup> and leave again the 8<sup>th</sup> [...]</i>	File 7, Tab 20(e), page H129.10	Time zone recalculated
<b>Wednesday 30 December 2015</b>			
13:57	Text from Raquel Pennington to AH: <i>I hope you understand. I love you, I can't wait to see you. But regarding J, I just don't know what to do. I've been working so hard this week to dig deep and find space inside to understand, but I feel so bound.</i>	File 7, Tab 13, page H73	
18:30	Text from JD to David Heard: [...] <i>Below is a text that I never hit send on from a week, or so again... It was in response to you...</i>	File 10, Tab 147(a), page O124	



Time (LA)	Event	Trial Bundle ref	Comments
	<p><i>Hey, brother... I love you, too!! More than you can ever imagine...!!! It's rare in life when one meets a kindred spirit... A couple of madmen with the thirst for 'FURTHER!!!'... Their have only been maybe 3 people in my entire life, of your ilk!!! You're a rare specimen and our friendship means everything!!! Yes, I fucked up and went too far in our fight!!! I cannot and WILL NOT excuse my part inside these dramas!!!</i></p> <p><i>But, I can promise you, with all confidence, THEY WILL NEVER HAPPEN AGAIN!!! My most sincere apologies if I've let you down...Love you, brother...X. JD</i></p>		
20:06		File 6, Tab 148(c), page F894.148A	
<b>Thursday 31 December 2015</b>			
Time unknown	<p>7 short audio recordings:</p> <ul style="list-style-type: none"> <li>• F161d. CTRL00071905</li> <li>• F161e. CTRL00071906</li> <li>• F161f. CTRL00071907</li> <li>• F161g. CTRL00071908</li> <li>• F161h. CTRL00071910</li> <li>• F161i. CTRL00071911</li> <li>• F161j. CTRL00071913</li> </ul> <p>Agreed combined transcripts are at File 5, Tab 161(j)(i), pages F1009.10.1 to F1009.10.3</p>	File 5, Tab 161(j)(i), pages F1009.10.1 to F1009.10.3	[The date of these recordings has not been agreed between the parties]

Time (LA)	Event	Trial Bundle ref	Comments
01:03		File 6, Tab 148(c), page F894.148B	
09:03 – 15:46	<p>Texts between AH and Erin Boerum:</p> <p>AH: <i>ha! I think J was trying to text from my computer last night..... i just read those last ones.. sheesh</i></p> <p>EB: <i>Ha! OK, that makes a little more sense. I didn't understand when I read those this morning.</i></p> <p>AH: <i>yeah, that was J he was fucked up shocker i know</i></p> <p>EB: <i>Uh oh. Went me to tell Debbie or Kipper or do you want to fill him in? Meaning Kipper</i></p> <p>AH: <i>yeah - he was doing shots last night (which is a first in a Very long time.... maybe since australia?) anyways, that plus finding all that coke last week- makes me really understand that is really what the fighting is about. its been so bad lately and I've just been blaming myself so much. but with the use, its unsurprising..... it's no coincidence, i can say that. anyway, we're still on the island. he got really fucked up last night and it was a mess. basically, we were supposed to come home today but I'm not sure anymore. our</i></p>	File 9, Tab 119, page K134	

Time (LA)	Event	Trial Bundle ref	Comments
	<p><i>plane is here but J is sleeping something off that no one has been able to really wake him up from so we probably won't leave until tmrw. kipper really needs to see him bad.... thanks for checking in</i></p> <p><i>EB: Oh my.! Wow. Are you doing ok? I will call Kipper to fill him in. Has it been bad on the island this whole time? Also, if possible can you let me know if/when you do get on the plane so I know? Thanks and love</i></p> <p><i>AH I'm en route Yes I'm good Everything is okay</i></p> <p><i>EB: Glad to hear it! Safe travels m'lady. Happy new year to you and the family. Xo</i></p>		

See also:

- **Audio recording made on 4 January 2016:** [Media file "M141. Audio recording with the filename '20160103 183858.m4a', recorded on 4 January 2016 at 23858pm (UTC+0)". Agreed transcript is at **File 9, Tab 141, pages M2.1 – M2.30**. It includes the following (pages M2.4 – M2.5):

*AH: ... everyone around me, saw all the bruises and the broken blood vessel under my eye, the bruises on my head, the missing chunks of hair, the split lip, the black eye, the swollen nose all that shit because you're stronger. It does not mean, it does not mean because they heard me that I am somehow more responsible, it just means they heard me because I yell in a fight. You do provoke, I yell it doesn't mean I am more responsible or badder however I am exposed via that the distance of between Café Cabrones and the house is significant and I know, I know that does not mean that they got an accurate representation of our fight, if you told them stuff, great, cool thanks for exposing me as I said to you before don't do it again unless you want me to really also tell them my side of things, because trust me*

*JD: You are welcome to*

*AH Trust me, you know I have a different side than you and if I show them pictures and stuff, I'm sure they will have even more of a different side. And in fact, if I told them even more stuff, they will have even more of a clear picture of what I think of both sides.*

*JD Maybe I should show them this and this and this from the mineral spirits*

*AH You can do what do whatever you want, you can do whatever you want*

*JD Or the can that you threw at my face*

*AH By the way, do it I promise you do it. Do whatever you want*

*JD You don't want me to do that*

*AH No, you owe it, you do whatever you want*

*JD They will never speak to you again*

- **Audio recording made on or around 22 July 2016:** [Media file "F161m. CTRL00058198"]. Claimant's transcript is at File 5, Tab 161(n). Defendants' transcript at File 5, Tab 161(o). Both transcripts include the following:

*JOHN C. DEPP, II: I head-butted you in the fuckin'...*

*AMBER LAURA HEARD: I couldn't believe you did that.*

*JOHN C. DEPP, II: ...forehead. That doesn't break a nose.*

*AMBER LAURA HEARD: I don't know if you were aware, I don't think you did. I don't think you broke it.*

*JOHN C. DEPP, II: Don't think I broke it, I didn't touch it!*

*AMBER LAURA HEARD: Oh, please, you didn't touch it? You don't know.*