

## Registered nurse Erin Boerum / Collection of notes and texts

**Saturday 7 March 2015**

Time unknown	<p>Medical notes for AH:</p> <p>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 stabilizatoin.</p>	File 9, Tab 132, page K205	
--------------	---	----------------------------	--

**Sunday March 8 2015**

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	
--------------	--	----------------------------	--

**Monday March 9 2015**

Time unknown	<p>Medical notes for AH:</p> <p>3/9/15: 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	
--------------	---	----------------------------	--

# Registered nurse Erin Boerum / Collection of notes and texts

Tuesday December 15 2015

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	
-------	--	--------------------	--

Wednesday 16 December 2015

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
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
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
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
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
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:	File 2.1, Tab 71.3, page	Time zone



# Registered nurse Erin Boerum / Collection of notes and texts

Wednesday December 16 2015

13:59	Text from Erin Boremn 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
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
21:58 – 22:26	Texts between AH and Erin Boerum 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>  AH: <i>I don't know if I have Xanax I'm so sad</i>  EB: <i>I know. I'm so sorry. Not a good situation</i>  AH: <i>If you're working tonight I'll just take ambien tonight</i>  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>	File 7, Tab 19(a), page H127.1	Time zone converted
Time unknown	<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	

Thursday 17 December 2015

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
09:52	Text from Erin Boreum to AH: <i>Did you sleep?</i>	File 7, Tab 19(a), page H127.1	Time zone recalculated
10:40 – 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
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

# Registered nurse Erin Boerum / Collection of notes and texts

Thursday December 17 2015

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
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 <u>Client: Amber Heard Depp</u> <u>RN: Erin Boerum</u></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	

Friday December 18 2015

Time unknown	12/18/15: Ct states she went to Dr. Kipper's office and was assessed by NP Monroe T. as Dr. Kipper was out of the office.	File 4, Tab 139, page F880.1	
--------------	---	------------------------------	--

Saturday December 19 2015

Time unknown	12/19/15: 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.	File 4, Tab 139, page F880.1	
--------------	--	------------------------------	--

Monday December 21 2015

Time unknown	12/21/15: 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.	File 4, Tab 139, page F880.1	
--------------	--	------------------------------	--



# Registered nurse Erin Boerum / Collection of notes and texts

Thursday December 31 2015


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	
	<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>EB: <i>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>AH <i>I'm en route Yes I'm good Everything is okay</i></p> <p>EB: <i>Glad to hear it! Safe travels m'lady. Happy new year to you and the family. Xo</i></p>		

# Registered nurse Erin Boerum / Collection of notes and texts

Saturday May 21 2016

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	
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	

Sunday May 22 2016

00:36	Texts from AH to Erin Boerum attaching images of AH's face: 	7/28(a)/H14 4.7	
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
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> 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>	7/28(a)/H14 4.5. Part of same conversation as at 7/28(a)/H14 4.6-.7	Time zone recalculated
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



1 HEARD - LAWS  
2 up.  
3 MR. JUSTICE NICOL: "Client admits to history of anxiety, eating  
4 disorder, ADHD, bipolar disorder, co-dependence issues and  
5 occasional insomnia." Have I got the right sentence?  
6 MS. LAWS: That is right, yes.  
7 MR. JUSTICE NICOL: Were those observations correct or incorrect?  
8 THE WITNESS: They are incorrect.  
9 MS. LAWS: Above that, in fact, is your history in relation to  
10 drugs, is it not? Do you see, after you referenced the two  
11 dogs, "AH reports history of substance abuse", do you see that  
12 sentence?  
13 A. I do see that sentence.  
14 Q. I am going to ask you a question about it. Have you  
15 anticipated the question?  
16 A. No, I said I see the sentence.  
17 Q. "AH report history of substance abuse, including an addiction  
18 to cocaine and liquor. Client reports abstaining from cocaine  
19 for a couple of years but was unable to report exact dates."  
20 Was that true?  
21 A. No.  
22 Q. So, Dr. Kipper has either lied or got it wrong, is that right,  
23 when passing your history on to Erin Burin?  
24 A. I did not spend much time with Kipper. I do not even know

10 Q. This is the page we have looked at before, 27th August 2014  
11 So, it is the first visit with Erin Burin that we have looked  
12 at before, all right, so that has to put it in context. The  
13 final paragraph says: "Per report from JD, Debbie RN,  
14 Dr. Kipper. Client AH has reportedly been experiencing  
15 increased anxiety and agitation recently and has had several  
16 outbursts of anger and rage, her mood has been labile."  
17 I will finish that next sentence: "Both client and fiancé, JD,  
18 report an increase in verbal disagreements resulting from  
19 client's anxiety and emotional lability. Client expressed  
20 concern to husband and Dr. Kipper that she is nervous about  
21 being alone while husband is working on movie set in London  
22 and expressed she has difficulty dealing with feelings of  
23 insecurity and jealousy when not in the presence of her  
24 husband." Let us break it down. What it looks like there is  
25 that Erin Burin is reporting partly what you have said to her

[Page 1585]

1 HEARD - LAWS  
2 and partly what others have said to her. Would you agree with  
3 that?

[Page 1547]

1 HEARD - LAWS  
2 A. No, I was on one medication.  
3 MR. JUSTICE NICOL: Just a minute. Receiving medication and  
4 treatment before you met Mr. Depp, and you said?  
5 THE WITNESS: I may have misheard you, but I think Ms. Laws said a  
6 variety of medication?  
7 Q. Were you on any medication, before ----  
8 A. Just that one that I have just mentioned.  
9 Q. Can you tell me what the one that you were on was?  
10 A. It is called Provigil, it is prescribed for narcolepsy and  
11 sleep pattern disruption.  
12 Q. That was the only medication that you were on before you met  
13 Mr. Depp, was it?  
14 A. Yes.  
15 MS. LAWS: I suggest that is a total lie what you have just said.  
16 A. No, it is not.  
17 Q. All right. Let us go on to the rest of the entry there, at  
18 page 211. It is in relation to your illegal drug abuse.  
19 "Client admits to illicit drug use during the trip and states  
20 she ingested mushrooms and MDMA simultaneously while also  
21 consuming alcohol...(reads to the words)... client reported  
22 that her husband was not aware of male visitors nor her  
23 illicit drug use." Can I ask you, is that entry correct or  
24 has Erin Burin got any of that wrong?  
25 A. I do not think she had anything wrong.

[Page 1593]

1 HEARD - LAWS  
2 course, attending a meeting, studying, you took your  
3 medications at the proper time, then you went out shopping  
4 with Erin Burin "and with the client's assistant". Who was  
5 that?  
6 A. Savannah McMillen, my friend.  
7 Q. You have described her here as your assistant, though?  
8 A. I did not.  
9 Q. So that is another mistake by ----  
10 A. That is Erin, yes.  
11 Q. "...and Debbie. Then RN...(reads to the words)... coping  
12 skills involved compulsive anger and yelling." Do you  
13 remember that now? Do you remember that incident, going to a  
14 restaurant and feeling frustrated with the waiting staff?  
15 A. No.  
16 Q. This clearly is an incident where Mr. Depp is not even  
17 present?  
18 A. Yes, but, as she said, I was calm about it.  
19 Q. Was that his fault as well?  
20 MR. JUSTICE NICOL: Just a minute. So you recall the incident  
21 with the waiting staff and then you were asked, I think, was  
22 Mr. Depp present on this occasion?  
23 A. No, he was not, but as Erin Burin said herself, I dealt with  
24 it calmly.



HEARD - LAWS

Q. We do not need to go over again what had happened. It was very unpleasant. "Client states she is experiencing high level of anxiety." Erin Burin goes to your house, you are crying, hyperventilating, you were offered emotional support by her and guided through relaxation techniques; is that all correct?

A. That sounds right. I do not remember that specific instance in full detail, of course, but ----

Q. I think you remember it, though. You have just told us in great detail about what happened?

A. I told you the background. You do not forget that part. That is a big thing in somebody's life, but I do not remember every detail of the conversation we had.

Q. "Client's fiancé", it is noted, "offered emotional support. Client able to calm self and agree to journal thoughts as coping mechanism." So, in fact Mr. Depp was being calming towards you. That is right, is it not?

A. He might have been in front of other people. He did not stay in that mood very long.

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

MS. LAWS: Now, if I can move on, then, please, a number of witnesses we have heard, and I will not go through them all, have described you as ----

MR. JUSTICE NICOL: Can we put this volume away?

MS. LAWS: Yes, or if we can keep it out for a moment, there is

Now, that was over the phone, that conversation, but the very next day, so on 17th December, Erin Burin is in contact with you to notify you that she will be able to deliver your medications to your home. So she turned up -- this is quite late -- at 11 o'clock at night, and waited at the door for several minutes after knocking. You greeted her at the door looking dishevelled, with your hair unbrushed, weepy and sad, slouched posture, and you told Ms. Burin about an argument with Mr. Depp. Then there is a discussion about her offering emotional support and that she could not stay. It is this bit I am asking you about, the last sentence: "The client had visible bright red blood appearing at centre of lower lip. When RN made client aware that she was actively bleeding on her lip, client stated it was from the injuries sustained in the argument between her and her husband, and that it continued to bleed actively. Client also states that her head is bruised and she lost clumps of hair in altercation. RN briefly looked at client's scalp, but was unable to visualise the haematomas the client had described. RN encouraged the

[11] (Pages 1908 to 1911)

[Page 1912]

HEARD - LAWS

client to be seen by physician, Dr. Kipper, or go to an emergency." You did not have any bruising at all when you saw Erin Burin, did you?

A. I had two black eyes, a broken nose and a broken lip, bruised ribs, bruises all over my body.

MR. JUSTICE NICOL: Just a minute. (Pause) You were being particularly asked about bruises and you said you had bruised ribs ----

A. I had bruised ribs, bruises all over my body, bruises on my forearms from trying to defend the blows. I had two black eyes. I had a broken nose. I had a broken lip. I had bruises primarily. The really bad ones were in my hairline, in my scalp, my chin ----

Q. Just a minute. (Pause)

A. There were chunks of hair missing, there was pus in those wounds, in my hairline, dark red bruises specifically, like, purple/red on my temples and in my chin. The inside of my upper lip was cut.

MS. LAWS: This is just nonsense, is it not? She did not see any bruising on your face at all, did she?

A. She did a concussion check that night ----