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<p>1 DEPOSITION EXHIBITS</p> <p>2</p> <p>3 EXHIBIT NUMBER DESCRIPTION PAGE</p> <p>4 (NONE)</p> <p>5</p> <p>6</p> <p>7</p> <p>8</p> <p>9</p> <p>10</p> <p>11</p> <p>12</p> <p>13</p> <p>14</p> <p>15</p> <p>16</p> <p>17</p> <p>18</p> <p>19</p> <p>20</p> <p>21</p> <p>22</p> <p>23</p> <p>24</p> <p>25</p>	<p>1 in the outcome.</p> <p>2 If there are any objections to proceeding,</p> <p>3 please state them at the time of your appearance.</p> <p>4 At this time will counsel and all present</p> <p>5 please state their appearances and affiliations for</p> <p>6 the record.</p> <p>7 MS. BILES: Brit Biles, Stein Mitchell Beato &amp;</p> <p>8 Missner for Mr. Depp and his companies.</p> <p>9 MR. WRENSHALL: Mathew Wrenshall, Reed Smith LLP</p> <p>10 for Bloom Hergott and Jacob A. Bloom.</p> <p>11 MR. WALDMAN: Adam Waldman Endeavor Law Firm for</p> <p>12 Johnny Depp and his companies.</p> <p>13 THE WITNESS: Cornelius Harrell, Eastern</p> <p>14 Columbia concierge.</p> <p>15 THE VIDEOGRAPHER: Thank you. Could we please</p> <p>16 have the oath.</p> <p>17</p> <p>18 CORNELIUS HARRELL,</p> <p>19 having been first duly sworn, testified as follows:</p> <p>20</p> <p>21 EXAMINATION</p> <p>22</p> <p>23 BY MS. BILES:</p> <p>24 Q. Mr. Harrell, my name is Brit Biles and I</p> <p>25 represent Mr. Depp and his production companies,</p>
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<p>1 LOS ANGELES, CALIFORNIA, THURSDAY, JANUARY 31, 2019</p> <p>2</p> <p>3 THE VIDEOGRAPHER: Good afternoon. We are on</p> <p>4 the record at 1:11 p.m. on January 31, 2019. Please</p> <p>5 note that the microphones are sensitive and may pick</p> <p>6 up whispers, private conversations, and cellular</p> <p>7 interference. Audio and video recording will</p> <p>8 continue to take place unless all parties agree to</p> <p>9 go off the record.</p> <p>10 This is media unit number one of the video</p> <p>11 recorded deposition of Cornelius Harrell taken by</p> <p>12 counsel for the plaintiffs and cross-defendants in</p> <p>13 the matter of John C. Depp, II, et al., versus Bloom</p> <p>14 Hergott Diemer, et al., and related cross-complaint.</p> <p>15 Filed in the Superior Court of the State of</p> <p>16 California for the County of Los Angeles, case</p> <p>17 number BC680066.</p> <p>18 This deposition is being held at Reed Smith</p> <p>19 located at 355 South Grand Avenue, Los Angeles,</p> <p>20 California 90071.</p> <p>21 My name is Steven Togami from the firm</p> <p>22 Veritext Legal Solutions and I am the videographer.</p> <p>23 The court reporter is Shawna Higgins from the firm</p> <p>24 Veritext Legal Solutions. I am not related to any</p> <p>25 party in this action nor am I financially interested</p>	<p>1 some of his other business entities. You previously</p> <p>2 testified in deposition related to some interactions</p> <p>3 that you had with Amber Heard in 2016, so today I</p> <p>4 would just want to follow up with you on some of</p> <p>5 those interactions and ask you some more questions.</p> <p>6 But before we do that I want to go through some</p> <p>7 basics of a deposition. You have been deposed</p> <p>8 before, but I just want to go over them again.</p> <p>9 The court reporter is taking down</p> <p>10 everything that anyone says and she can't take down</p> <p>11 when people are talking over each other, so it's</p> <p>12 important that I let you finish before I jump in</p> <p>13 with a question and you let me finish my questions</p> <p>14 before you jump in with an answer. When people are</p> <p>15 just speaking, sometimes they finish each other's</p> <p>16 sentences and things like that, but we have to be</p> <p>17 artificial and stilted here where I finish speaking,</p> <p>18 then you answer, then you finish speaking and then I</p> <p>19 talk again. So will you do your best to do that</p> <p>20 today?</p> <p>21 A. Absolutely.</p> <p>22 Q. And if you don't understand a question,</p> <p>23 please let me know. I will do my best to rephrase</p> <p>24 it in a way that's more understandable. But if you</p> <p>25 answer my questions, I'm going to assume that you</p>

<p style="text-align: right;">Page 10</p> <p>1 understood them.</p> <p>2 Is that fair?</p> <p>3 A. Yes.</p> <p>4 Q. And if you need to take a break at any</p> <p>5 time, just let us know and we can go off the record</p> <p>6 and do that. I just ask that if I have a question</p> <p>7 pending that you go ahead and answer before we go</p> <p>8 off the record for a break.</p> <p>9 A. Got it.</p> <p>10 Q. Is that good?</p> <p>11 A. Yes.</p> <p>12 Q. Is there anything that would prevent you</p> <p>13 from giving full and complete testimony today?</p> <p>14 A. No.</p> <p>15 Q. Okay. Well, let's get started then.</p> <p>16 When you introduced yourself on the record</p> <p>17 you said that you were a concierge at the Eastern</p> <p>18 Columbia Building. Is that your occupation?</p> <p>19 A. Yes.</p> <p>20 Q. Okay. Where is the Eastern Columbia</p> <p>21 Building?</p> <p>22 A. 849 South Broadway.</p> <p>23 Q. And what are your job responsibilities as</p> <p>24 concierge at the Eastern Columbia Building?</p> <p>25 A. At the Eastern Columbia our</p>	<p style="text-align: right;">Page 12</p> <p>1 2016. By May 21, 2016 were you permanently</p> <p>2 stationed at Eastern Columbia?</p> <p>3 A. Yes.</p> <p>4 Q. Okay. And do you know Amber Heard?</p> <p>5 A. When you say "know," can you clarify?</p> <p>6 Q. Sure. Do you recognize her when you see</p> <p>7 her?</p> <p>8 A. Yes.</p> <p>9 Q. Okay. And how did you come to recognize</p> <p>10 her when you see her?</p> <p>11 A. I met her at the Eastern Columbia Building.</p> <p>12 We had interaction and I was able to identify her as</p> <p>13 a resident there and in doing my job I serviced her</p> <p>14 a few different times.</p> <p>15 Q. When you say you "serviced her a few</p> <p>16 different times" in your job, can you explain what</p> <p>17 you mean by that?</p> <p>18 A. We had many interactions in which I -- she</p> <p>19 came down to get packages, I escorted her into the</p> <p>20 lobby, we just had small talk just to get the things</p> <p>21 that she needed from me.</p> <p>22 Q. Was she -- sorry, go ahead.</p> <p>23 A. Yeah, Just to get the things that she</p> <p>24 needed from me kind of squared away.</p> <p>25 Q. Was Ms. Heard a resident of the Eastern</p>
<p style="text-align: right;">Page 11</p> <p>1 responsibilities are to ensure that all of the</p> <p>2 tenants have what they need, whether that be</p> <p>3 packages, whether that be guests letting -- being</p> <p>4 checked in, as well as just the security operations</p> <p>5 of the building.</p> <p>6 Q. And how long have you been a concierge at</p> <p>7 the Eastern Columbia Building?</p> <p>8 A. Currently two and a half years.</p> <p>9 Q. So did you start working there</p> <p>10 approximately 2016?</p> <p>11 A. Permanently, yes. I helped out before</p> <p>12 prior, 2015, but I was assigned to a different</p> <p>13 building at that moment, so I helped out prior to</p> <p>14 2016, but I became permanently there in 2016.</p> <p>15 Q. Okay. What month did you become</p> <p>16 permanently stationed at Eastern Columbia, if you</p> <p>17 recall?</p> <p>18 A. If I were to give you a rough estimate</p> <p>19 would that be okay?</p> <p>20 Q. Sure.</p> <p>21 A. Maybe in March.</p> <p>22 Q. Of 2016?</p> <p>23 A. Yes.</p> <p>24 Q. Okay. You previously testified about an</p> <p>25 interaction that you had with Amber Heard on May 21,</p>	<p style="text-align: right;">Page 13</p> <p>1 Columbia Building in May of 2016 to your knowledge?</p> <p>2 A. Yes.</p> <p>3 Q. Okay. Did you ever have any interactions</p> <p>4 with Mr. Johnny Depp?</p> <p>5 A. I did not.</p> <p>6 Q. Okay. Let's focus in on the interaction</p> <p>7 that you previously described having with Ms. Heard</p> <p>8 on May 22, 2016. You previously testified about</p> <p>9 providing a package to Ms. Heard on that date. Can</p> <p>10 you tell us about your interaction with Ms. Heard on</p> <p>11 May 22nd?</p> <p>12 A. Yes. Ms. Heard and I, we talked, she</p> <p>13 caught me at the front desk as I was sitting down</p> <p>14 and she said that she had a package that she had</p> <p>15 needed to pick up. She and I had dialogue that was</p> <p>16 exchanged and she said it was some wine that she was</p> <p>17 looking for, because I let her know there may be</p> <p>18 more packages than just one. We walked over to the</p> <p>19 package room and we were able to identify where her</p> <p>20 packages went and she kind of picked out a couple.</p> <p>21 There were a few others in there. She picked out</p> <p>22 one that she wanted and we just exchanged some</p> <p>23 dialogue when she had her dog and, yeah, that was</p> <p>24 it. We walked to the elevator, I buzzed her button</p> <p>25 with her and we kind of went from there.</p>

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1 Q. Approximately what time of day was it?

2 A. I work at Eastern Columbia around -- the

3 only shifts I work are Sundays from 8:00 to 4:00

4 with the exception I believe of a couple weeks in

5 May that I worked a couple other shifts. I would

6 say that that was probably around the noon to 3:00

7 hour if I were to range in it.

8 Q. And when you were interacting with

9 Ms. Heard what did she look like?

10 A. Ms. Heard looked like a beautiful girl. It

11 was one of the few times that I got to interact with

12 her and we actually talked a little bit more than we

13 normally did. I can't remember if it was prior to

14 that or after that where she needed a jacket

15 dry-cleaned and it was like a really big deal for

16 her and I remember us either talking about it then

17 or bringing it back up at that interaction. So

18 overall seeing her was kind of refreshing. And she

19 just, again, physical appearance I just feel like

20 she's a beautiful girl and she was kind of in like a

21 sun outfit and I just kind of complimented her style

22 at that time and we just kind of small talked which

23 led me into getting her package.

24 Q. Okay. When you say that she looked like a

25 beautiful girl, did she have on makeup?

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1 A. If she had makeup it was very light because

2 she was very refreshed. It didn't look like she had

3 like a lot of makeup on. It didn't look like she

4 was going anywhere. So I have a lot of girlfriends

5 who do wear makeup. I would say she had bare

6 minimum because she was living in her everyday life.

7 Q. Okay. Did she appear to you to have any

8 injuries to her face on May 22, 2016?

9 A. She did not.

10 Q. Okay.

11 A. And that was one of the first times I seen

12 her like physically other than cameras and one of

13 the few times and I just remember staring at her

14 kind of being like, wow, this girl is beautiful.

15 And then I did have the interaction of talking to

16 her and I was obviously observing her because she

17 was radiant in the way she looked and she had like a

18 summer outfit on and, yeah.

19 Q. Okay. So it's fair to say you didn't see

20 any bruises on Ms. Heard's face on May 22, 2016?

21 A. That is correct.

22 Q. What about any cuts or scratches?

23 A. I did not see any of that either.

24 Q. Okay. Any swelling on her face on that

25 date?

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1 A. No.

2 Q. Okay. Did anything appear out of the

3 ordinary about Ms. Heard's face on May 22, 2016?

4 A. It did not.

5 Q. Okay. We actually have some surveillance

6 video from the Eastern Columbia Building that I

7 believe was captured on that date and I want to take

8 a look at those, but before that, can you explain

9 your understanding of the surveillance system at the

10 Eastern Columbia Building?

11 A. Yes. The surveillance system at the

12 Eastern Columbia Building allows us to have eyes

13 everywhere, analyze what we could do better and

14 analyze any threats to the residents' security.

15 With that being said, we have a lot of cameras that

16 show different things in the package room, just

17 interactions overall, as well as ensuring that

18 things are getting distributed appropriately. For

19 example, if a resident says they came down and

20 picked up a package, we can use that camera footage

21 to see if they indeed came down and picked up that

22 package.

23 Q. When you're on your job at the Eastern

24 Columbia Building is it your responsibility to

25 monitor the camera footage?

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1 A. Monitor the camera footage in what way?

2 Q. Do you see it, the footage as it's being

3 recorded in real time?

4 A. Yes.

5 Q. Okay. And where do you see that?

6 A. If sitting at the desk, we see the cameras

7 in real time to the right.

8 Q. Okay. And are they displayed somewhere,

9 your desk where you're sitting?

10 A. Yes, we have monitors; two of them that

11 show us every angle of the building in the most

12 accurate way so we can kind of see threats or see

13 problems that may occur.

14 Q. Okay. And where are you physically

15 stationed when you're in the Eastern Columbia

16 Building?

17 A. We have a front desk and it is I would say

18 200 feet from the door.

19 Q. Is that where you sit when you're working

20 there?

21 A. Yes.

22 Q. Okay. Do you ever leave the front desk for

23 anything?

24 A. Yes.

25 Q. Okay. Can you give me some examples of



1 when you would leave the front desk?

2 A. We would leave the front desk to go to the

3 package room to take packages for our residents, we

4 would leave the front desk to accept packages, we

5 would leave the front desk to identify problems that

6 we'd seen in the cameras, we would also leave the

7 front desk if anyone needed some help or any

8 explanations, we would leave the front desk

9 ultimately to provide better service for the

10 residents that live in the building.

11 Q. And when you say "we" are you talking about

12 yourself personally?

13 A. The concierge team.

14 Q. Okay. Who is on the concierge team?

15 A. Currently or in that time? It's changed.

16 Q. In that time.

17 A. In that time we had, we had myself. We had

18 someone named Michael, Michael Wiener I believe his

19 last name is. We had someone named King Joe. We

20 have Trinity Esparza, she's the CEO of the company.

21 And then we had a couple part-timers at that time.

22 And Alex as well.

23 Q. Who is Alex?

24 A. Alex is the Monday through Friday lead.

25 His shift is the bottom half, so Trinity would have

1 the morning shift and he would have the night shift.

2 Q. Okay. Is Trinity -- you said she was the

3 CEO. Is she your boss?

4 A. Yes.

5 Q. Okay. Let's take a look at some security

6 footage.

7 MR. WRENSHALL: What exhibit is this?

8 MS. BILES: This is 204-G.

9 BY MS. BILES:

10 Q. What is depicted in this surveillance

11 video?

12 A. In that video, it is the elevator.

13 Q. Which elevator?

14 A. That is the -- only one elevator goes to

15 the penthouse level, so depending on where you're

16 looking at, it can be elevator one or elevator

17 three.

18 Q. Okay. And what date was this footage shot?

19 Can you tell by the video?

20 A. May 22, 2016.

21 Q. Is that the same day that you interacted

22 with Ms. Heard that you previously described?

23 A. I believe so.

24 Q. Okay. Let me back up so you can see this

25 person again on the video, getting on the elevator I

1 mean.

2 Take a look at the person who gets on this

3 elevator and let me know if that's someone you

4 recognize.

5 A. Yes.

6 Q. Who is that?

7 A. That's Amber Heard.

8 Q. Okay. Let's see. Where is she getting on

9 the elevator?

10 A. Penthouse level, which is the level she

11 lives -- at that time she lived in.

12 Q. Okay.

13 A. To my knowledge.

14 Q. Approximately what time is this? Can you

15 tell from the video?

16 A. It looks like it's 1:06.

17 Q. Is that approximately the same period of

18 time when you interacted with Ms. Heard about the

19 package?

20 A. (No response.)

21 Q. I believe you previously testified it was

22 between noon and 3:00?

23 A. Yes.

24 Q. Where did Ms. Heard just get off of this

25 elevator at?

1 A. That's level one. That's where I would be.

2 Q. Okay. Let's take a look at another video.

3 Let's look at video number four which was previously

4 marked as 204-I.

5 What is this footage of?

6 A. That footage is of the hall leading to the

7 dog run, package room, bathroom, manager's office.

8 Q. Okay. And what is the date of this

9 footage?

10 A. May 22nd, 1:07.

11 Q. Okay. There will be some people -- do you

12 recognize who that was? Let me back up. It's right

13 at the bottom of the screen.

14 A. Yes, that looks like me.

15 Q. Who is that with you?

16 A. That's Amber.

17 Q. Where were you and Ms. Heard going in this

18 video?

19 A. That is the package room.

20 Q. Okay. Does this -- is it your belief that

21 this footage was shot on the surveillance cameras

22 when you were going with Ms. Heard to pick up the

23 package she requested?

24 A. I'm sorry, I don't understand the question.

25 Q. Sure. You previously testified that you

<p style="text-align: right;">Page 22</p> <p>1 worked with Ms. Heard to pick up a package on  2 May 22, 2016 sometime in the afternoon between 12:00  3 and 3:00. This is footage of you and Ms. Heard  4 going to a package room. Is it your understanding  5 by looking at this surveillance video that this is a  6 recording of the interaction you previously  7 described?  8 A. Yes.  9 Q. Okay. How big is the package room?  10 A. Fairly small. I would say it's no bigger  11 than a walk-in closet.  12 Q. Did Ms. Heard go into the package room with  13 you?  14 A. She did peek her head into the package room  15 with me because we identified like her area in the  16 package room which is the PH level and, again, I  17 believe she had more than one package and she was  18 looking for one specific package.  19 Q. Do you recall which specific package?  20 A. Wine.  21 Q. Okay. Is that her leaving with the  22 package?  23 A. Yes.  24 Q. Okay. Now I want to go to what has  25 previously been marked as 204-H.</p>	<p style="text-align: right;">Page 24</p> <p>1 specific people you recall checking in for  2 Ms. Heard?  3 A. I have checked in her sister. I have  4 checked in Kara Devine, Devine, one of her friends,  5 amongst a couple other people who may work with her  6 or for her sister.  7 Q. Okay. In your prior deposition you  8 testified about seeing Ms. Heard on the surveillance  9 videos with a male guest.  10 Do you recall that?  11 A. Do I recall saying that or do I recall  12 seeing it?  13 Q. Let's start with saying that. Do you  14 recall saying it?  15 A. No, I don't actually.  16 Q. Okay. Well, do you recall seeing her with  17 a male guest?  18 A. Yes.  19 Q. Okay. Do you know who that male guest was?  20 A. No.  21 Q. Okay. I have some surveillance videos from  22 that date so we can see if that's the person you  23 recall seeing her with. Okay. This is 204-L.  24 What is the date of this surveillance  25 video?</p>
<p style="text-align: right;">Page 23</p> <p>1 What is this surveillance footage of?  2 A. That's surveillance of the mezzanine level  3 and that leads to the mailbox access and the parking  4 structure elevator that the residents park in.  5 Q. Okay. Who is that? Let me back up.  6 A. That looks like Amber.  7 Q. Where is she going there?  8 A. She's going into the parking structure.  9 That door leads to the parking garage.  10 Q. Okay. You had mentioned earlier that one  11 of your responsibilities as concierge involves  12 interacting with guests or assisting residents with  13 guests. Can you describe what you do in relation to  14 guests?  15 A. If any of the residents have guests, I  16 would check them in and ensure that they are  17 expected guests, so we would call the resident and  18 ensure that they have access up.  19 Q. Did you ever check in any guests for  20 Ms. Heard?  21 A. Yes.  22 Q. When was that? Do you recall a specific  23 time you checked in a guest for Ms. Heard?  24 A. Specific time, no. Specific people, yes.  25 Q. Okay. Tell us about that. Who were some</p>	<p style="text-align: right;">Page 25</p> <p>1 A. May 22, 2016.  2 Q. And what time is it?  3 A. It looks like it's 10:56 p.m.  4 Q. Okay. Do you recognize the person who is  5 getting on the elevator?  6 A. Yes, it looks like Amber.  7 Q. Okay. Where is Ms. Heard going?  8 A. That is the mezzanine level.  9 Q. Okay. What is on the mezzanine level?  10 A. That will be -- she turned right, which  11 would be the mail room and/or the access to the  12 parking structure.  13 Q. Okay. She didn't appear to be wearing  14 shoes. Was it typical for her to walk around the  15 building without shoes on?  16 A. Not that I recall. However, I do know that  17 a lot of residents do not -- do walk around the  18 building without shoes on.  19 Q. Okay. Who is that?  20 A. That looks like Amber.  21 Q. Is this the male guest that you described  22 seeing Ms. Heard with? I can back it up so you can  23 get a look at him.  24 Is that the guest you described in your  25 prior testimony?</p>

1 A. No. I don't, I don't recall this  
2 interaction.

3 Q. Okay. Do you recall seeing this individual  
4 with Ms. Heard at any other time?

5 A. I can't really see his face from this  
6 footage. I'm trying to kind of like grasp it and  
7 put pieces together, but I can't really -- and if  
8 I -- I don't believe this is the shift I was  
9 working, so I probably wasn't here. I would have  
10 known if I was here during this time. However, I  
11 did see her with many male guests and friends, so I  
12 don't recognize him. I'm sorry.

13 Q. You said that you didn't believe you were  
14 working at this time. What time is captured in this  
15 video?

16 A. Looks like it's 10:57 p.m.

17 Q. On what date?

18 A. May 22, 2016.

19 Q. Okay. At some point in time did you come  
20 to learn that police had been called to the  
21 penthouse unit that Ms. Heard and Mr. Depp shared in  
22 the Eastern Columbia Building on May 21, 2016?

23 A. I did.

24 Q. Okay. How did you come to learn that?

25 A. My next shift, TMZ or some photographers or

1 something was outside of the building and I had no  
2 idea. And then one of the residents came up to me  
3 and told me.

4 Q. Who was the resident who told you that?

5 A. There were a few. I think the first  
6 resident that may have said something -- maybe I  
7 don't remember the first, but I remember a Sara  
8 Azari telling me and she lived in the building.

9 Q. Do you know approximately when Sara Azari  
10 told you that?

11 A. I don't recall the time, but I remember it  
12 being one of the shifts after that whole -- me  
13 working on the 22nd. It was later on in the week,  
14 maybe the following Sunday.

15 Q. What did Ms. Azari tell you?

16 A. Not much. She just mentioned, as many of  
17 the residents that day mentioned, "did you hear what  
18 happened" and just kind of like quickly caught me  
19 up. And at that moment I realized, oh, I didn't  
20 know this.

21 Q. When you said that she and other residents  
22 said "did you hear what happened" and they caught  
23 you up, what did they tell you happened?

24 A. When they told me something happened, it  
25 wasn't anything deep. I think it was just insight.

1 I believe Ms. Azari may have mentioned something  
2 happened in the penthouse, something happened with  
3 Johnny Depp.

4 Q. Okay. Was she anymore specific than that?

5 A. No.

6 Q. Did you later come to have more of an  
7 understanding of what allegedly happened in the  
8 penthouse?

9 A. Yes.

10 Q. Okay. What did you come to understand  
11 allegedly happened?

12 A. In quickly said, I would say there was a  
13 physical assault and Johnny had to vacate the  
14 premises.

15 Q. Who told you that?

16 A. I think I kind of captured it amongst a  
17 bunch of different resources. I reached out to  
18 Trinity just to ensure that I was doing everything  
19 right and then when residents told me that there  
20 were people, photographers outside, I didn't  
21 understand what to do and I reached out to my  
22 supervisor, who was Trinity, and she kind of let me  
23 know a little bit more and then she mentioned that  
24 some of the allegations -- not saying anything was  
25 true or false, just, "hey, heads up, these are some

1 of the things being said." And none of us knew  
2 exactly what it was, so we were just proceeding with  
3 caution with many allegations, I guess.

4 Q. Okay. You've used allegations a couple of  
5 times. Can you explain what you mean, what you were  
6 told the allegations were?

7 A. I would say I'm using allegation -- I could  
8 completely be using it in the wrong context. It was  
9 just something that was mentioned, it may not be a  
10 fact, it was just a piece of information. That's  
11 what I mean by allegation. And what we heard in  
12 quick said as all of us kind of switched off shifts  
13 is this was said during my, shift, whether it be  
14 from a resident, whether it be from someone that as  
15 I was monitoring the services, trying to capture  
16 pictures, someone -- I guess the collaborative  
17 message was that there was a domestic violence case  
18 with Johnny Depp and Amber and just to proceed with  
19 caution because at that moment we were not coming in  
20 contact with Amber because she was around more  
21 during that time to us and talking to us than she  
22 has been living in there.

23 Q. Well, when you -- did you have any personal  
24 opinions about the domestic violence allegations  
25 that Ms. Heard had made?



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1 A. No.

2 Q. Okay. Backing up to earlier in your

3 testimony, you testified that when you interacted

4 with Ms. Heard on May 22nd, which was the day after

5 the police was called, she looked radiant and

6 beautiful. Did you see any evidence when you were

7 interacting with Ms. Heard on that day that she had

8 been the victim of domestic violence the day before?

9 A. No.

10 Q. Okay. In your interactions with the

11 residents and the other -- let's start with the

12 residents, the residents of the Eastern Columbia

13 Building. Did you get any sense from any of the

14 residents what their views were about the

15 allegations that Ms. Heard had made against

16 Mr. Depp?

17 A. Not clear views. I think everyone was

18 curious just saying other things maybe that they

19 read. No one had concrete facts and that's why I

20 proceeded with just doing my job and not trying to

21 look too much into it, but being informed when I do

22 run into like media or anyone, just being informed

23 what I wanted to take from everyone's sayings. I

24 think there was a lot of people saying different

25 things, but no one really knew what was happening

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1 and I think for me I had no idea that it was the

2 next day until later, way later that I interacted

3 with her. And I guess it put me in a weird

4 situation because I was like I had no idea that it

5 was like the next day that those allegations

6 happened that I came in contact with her. That's

7 why I am here is to ensure that, I guess, from what

8 you guys see me interactions, giving my feedback

9 about what happened.

10 Q. Well, given that you did interact with her

11 the very next day after the supposed incident

12 allegedly took place, based on your interactions

13 with her, what is your opinion of those allegations

14 that she made?

15 A. I'm not so 100 percent because I have never

16 seen what the allegations -- it's not something I

17 looked into to be honest. I'll be completely honest

18 with you. I have not looked into what exactly her

19 allegations were. I just know that I was doing my

20 job at that moment. And after hearing everything

21 and kind of piecing it together myself, I interacted

22 with her that specific day and I seen her and I

23 don't think she had heavy makeup on. I don't

24 believe that from my interaction with her and seeing

25 her, all the allegations don't match in my opinion,

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1 if that's what you're asking.

2 Q. Yes. So when you say in your opinion the

3 allegations don't match, can you explain more what

4 you mean by that?

5 A. Yes. So in piecing together -- can you

6 tell me what the allegations are and maybe we can go

7 from there?

8 Q. Sure.

9 A. Because I'm piecing it together. Sorry.

10 Q. I will represent to you that the allegation

11 that she made was that Mr. Depp threw a cell phone

12 and hit her in the face and punched her in the face

13 as well and that she had bruises and cuts on her

14 face as a result of those alleged physical assaults.

15 So with that representation of what her

16 allegation was and going back to your prior

17 testimony that you didn't think the allegations fit

18 with what you had seen, can you explain what you

19 mean?

20 A. So someone who was bruised and cut, that

21 when I -- the interaction I had with her, I would

22 say that wasn't a person that was bruised or cut. I

23 didn't see any of those. And I think the thing

24 about me that I do do is I look at everyone in their

25 eyes. So I looked at her in her eyes and I would

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1 notices things like that and just the humanistic

2 part of me, if I noticed anything wrong I would ask

3 like I always asked her with that interaction and

4 others that I had after that because I did have

5 interactions after that with her and I did see --

6 you know, I'm one of the people that's responsive.

7 If you look at the footage it wasn't like really

8 quick, it wasn't like I ran to the package room.

9 There was dialogue that happened, just to make sure

10 like all the residents have a good experience with

11 me and they trust me and feel comfortable. Going

12 back to the allegations is if someone said they were

13 bruised or cut, I think you would be able to see

14 those things and I at that moment did not see those

15 things. That doesn't necessarily mean that they

16 didn't happen; however, I was very like aware of her

17 and I think she's very radiant and beautiful and I

18 would notice if she was bruised or anything looked a

19 little odd and in my opinion of that day I didn't

20 see those.

21 Q. Okay. Did you have any conversations with

22 any of the other staff at the Eastern Columbia

23 Building about the allegations that Ms. Depp had

24 made against -- sorry, Ms. Heard had made against

25 Mr. Depp?