

Claim No QB-2018-006323
IN THE HIGH COURT OF JUSTICE
QUEEN'S BENCH DIVISION
MEDIA AND COMMUNICATIONS LIST
Royal Courts of Justice,
Strand,
London, WC2A 2LL.
Tuesday, 14th July, 2020

Before:
MR. JUSTICE NICOL

BETWEEN:

JOHN CHRISTOPHER DEPP II
Claimant

-and-
(1) NEWS GROUP NEWSPAPERS LIMITED
(2) DAN WOOTTON
Defendants

(Computer-aided transcript of the Stenograph Notes of
Marten Walsh Cherer Limited, 2nd Floor, Quality House,
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MR. DAVID SHERBORNE, MS. ELEANOR LAWS QC and MS. KATE WILSON
(instructed by Schillings) appeared for the Claimant.
MS. SASHA WASS QC, MR. ADAM WOLANSKI QC and MS. CLARA HAMER
(instructed by Simons Muirhead & Burton) appeared for
the Defendants.

P R O C E E D I N G S
(DAY 6)

(TRANSCRIPT PREPARED WITHOUT ACCESS TO COURT BUNDLES)

1 CONNOLLY - SHERBORNE
2 on?
3 A. Yes.
4 Q. Can you find D171 for me, thank you, Mr. Connolly. Do you
5 have that?
6 A. I do, yes.
7 Q. Can I ask you, is that your signature?
8 A. It is, yes.
9 Q. And can you confirm that the facts in your witness statement
10 are true?
11 A. I can confirm that, yes.
12 MR. SHERBORNE: My Lord, I was going to ask for permission to ask
13 Mr. Connolly a few questions in examination-in-chief relating
14 to two incidents. Can I just explain?
15 MR. JUSTICE NICOL: Mr. Connolly, these are points that
16 Mr. Sherborne is putting to me. There is no need for you to
17 respond at the moment.
18 MR. SHERBORNE: Thank you, my Lord. One is the Hicksville
19 incident in June 2013. Now, that was not an allegation that
20 was made at the time that Mr. Connolly gave his witness
21 statement. It has arisen since then. I think it was raised
22 in March of this year. Given that he was present, I was going
23 to ask him a few questions about Hicksville.
24 Secondly, regarding the south-east Asia train journey,
25 you will recall, in July 2015, Mr. Depp, in answers, said that

1 CONNOLLY
2 MR. JUSTICE NICOL: Good morning. Yes, Mr. Sherborne.
3 MR. SHERBORNE: My Lord, can I call our next witness, Malcolm
4 Connolly.
5 MR. MALCOLM CONNOLLY, SWORN
6 EXAMINED BY MR. SHERBORNE
7 MR. JUSTICE NICOL: Do sit down, Mr. Connolly.
8 THE WITNESS: Thank you sir.
9 MR. JUSTICE NICOL: Mr. Connolly, this is a large room, it would
10 be helpful if you keep your voice nice and loud when answering
11 questions. Yes, Mr. Sherborne.
12 MR. SHERBORNE: Mr. Connolly, can I ask your full name, please?
13 THE WITNESS: Malcolm Connolly.
14 Q. If you turn to the right, you will see a large number of
15 coloured bundles. Can you find bundle number 2? It should be
16 the dark blue bundle on your right. If you turn to tab divider
17 53, do you see a document there entitled "Witness statement of
18 Malcolm Connolly"?
19 A. No. Sorry, wrong page, sorry.
20 Q. That is fine. File divider 53?
21 A. Yes, I do see it.
22 Q. And that says "Witness statement of Malcolm Connolly"?
23 A. Yes.
24 Q. Can I ask you, then, to turn a few pages back. If you look at
25 the bottom right-hand corner, do you see numbers, E168 and so

1 CONNOLLY - SHERBORNE
2 Mr. Connolly was on that trip with him and Ms. Heard, so I was
3 going to ask him a few questions about that. I do not imagine
4 it is going to be more than five or ten minutes at the most.
5 MR. JUSTICE NICOL: Ms. Wass, any objection?
6 MS. WASS: Yes. I was not told about this. I came into court in
7 advance of my Lord coming into court. Mr. Sherborne was here.
8 He did not tell me that this was his intention or that he
9 sought to make this application. We have had no notice about
10 this whatsoever. Not only that, the allegations about
11 Hicksville and the south-east train have been in the pleadings
12 for some considerable time, and in the witnesses' statements
13 for some considerable time. Therefore, we do object, first of
14 all, to the late application, which is made without any notice
15 whatsoever; and, secondly, to the ambush, if that is the right
16 words, by material of which we are completely unaware. So,
17 no, we say the rules have not been followed in this case,
18 Mr. Connolly has made a witness statement. If I say something
19 which provokes this being the subject of re-examination, that
20 might be different, but this is not material that should be
21 put before the court at this late stage.
22 MR. JUSTICE NICOL: Mr. Sherborne.
23 MR. SHERBORNE: First of all, it is not right, as a matter of
24 fact. The allegation, for example, of Hicksville has been
25 pleaded for some considerable time, as Ms. Wass said.

[Page 903]

1 CONNOLLY - SHERBORNE
 2 MR. JUSTICE NICOL: When do you say they appeared in the
 3 pleadings?
 4 MR. SHERBORNE: It was the newly pleaded allegation in March.
 5 MR. JUSTICE NICOL: Well, March, and we are now in July.
 6 MR. SHERBORNE: Well, my Lord, given that these allegations have
 7 been rehearsed by Ms. Heard since 2016 ----
 8 MR. JUSTICE NICOL: Well, that is a different point. What is
 9 being said is that if Mr. Connolly wished to say something
 10 about matters in the pleadings since March, he would have had
 11 the opportunity to put in a second witness statement.
 12 MR. SHERBORNE: My Lord, this is a classic example where witness
 13 statements stand as evidence-in-chief, and of permission being
 14 asked for, and in my submission granted, for matters that have
 15 been raised since witness statements. I can take you to the
 16 White Book.
 17 MR. JUSTICE NICOL: The point is a rather different one. I
 18 understand your point, that the matters were pleaded after the
 19 original witness statement, but what is being said, as I
 20 understand it, is that you could, as indeed you have done with
 21 other witnesses, put forward further witness statements that
 22 dealt with the material that has been more recently pleaded.
 23 MR. SHERBORNE: My Lord, I understand your Lordship's point. It
 24 is a difficulty in this case because we are constantly
 25 receiving additional allegations, changed allegations, and if

[Page 904]

1 CONNOLLY - SHERBORNE
 2 we put in a witness statement every time something new is said
 3 or it is put in a different way, your Lordship is going to be
 4 flooded with further witness statements. I appreciate ----
 5 MR. JUSTICE NICOL: I have had quite a lot of witnesses statements
 6 and supplementary witness statements.
 7 MR. SHERBORNE: Well, your Lordship has had a number from
 8 Ms. Heard, yes, in which there have been changing dates, and
 9 we will deal with that. In my submission, it cannot be right
 10 that we should only be permitted to ask a witness a few
 11 additional questions in relation to an incident which we have
 12 only raised with the witness in the last few days before the
 13 witness is giving evidence. Your Lordship will understand the
 14 practicalities of how trials work in preparation for a trial.
 15 These are a large number of alleged incidents that have
 16 been raised by Ms. Heard, and through her the defendants, and
 17 that is why, in my submission, if your Lordship is going to
 18 rule that witnesses who were present at an alleged incident
 19 should not be able to give a brief account of their role and
 20 what they saw or did not see, then not only does it mean that
 21 logistically, we are going to have to start preparing --
 22 I have not got to the end of the process if I can put it that
 23 way. I am not saying I anticipate numerous witness
 24 statements, but we may well have to put in further witness
 25 statements because points were put to Mr. Depp which were not

[Page 905]

1 CONNOLLY - SHERBORNE
 2 pleaded, which were not part of the defendants' case, or they
 3 are changed in some way.
 4 MR. JUSTICE NICOL: Mr. Sherborne, if your point is switching to
 5 matters that were not pleaded, then I have more sympathy with
 6 you, but we are not talking about that in relation to
 7 Hicksville or the train in south-east Asia.
 8 MR. SHERBORNE: No, I am talking about ways in which allegations
 9 have now changed, which have been put, which means that
 10 therefore we are going to have to consider whether witnesses
 11 have to deal with the new way in which an allegation is put.
 12 We had that time and time again in Ms. Wass's
 13 cross-examination of Mr. Depp. The chief point is this. The
 14 court is being asked to examine 14, at least 14 now, alleged
 15 incidents of violence and if we have a witness who can give
 16 relevant evidence as to that incident, then, in my submission,
 17 it would be right, as a matter of discretion, for
 18 your Lordship to allow that witness to give his account. I do
 19 not really see that Ms. Wass is going to be hugely surprised
 20 in a case where, as your Lordship will know, there are two
 21 dramatically contrasting and conflicting accounts of every
 22 incident.
 23 Ms. Wass will no doubt put her allegation, and in so far
 24 as Mr. Connolly can assist the court as far as his
 25 recollection of that event is concerned, then the court will

[Page 906]

1 CONNOLLY - SHERBORNE
 2 benefit from doing so. As I say, I am not seeking to raise an
 3 in terrorem argument, but if the approach is going to be as
 4 Ms. Wass suggests, then it may well be that we will have to
 5 start serving further witness statements and having ----
 6 MR. JUSTICE NICOL: That has happened. Mr. Sherborne, I have some
 7 sympathy with Ms. Wass's position.
 8 MR. SHERBORNE: I understand.
 9 MR. JUSTICE NICOL: What I am going to do is, for the moment at
 10 least, to allow you to ask the further questions in
 11 examination-in-chief. If Ms. Wass needs time to consider and
 12 take instructions on those further matters, then I will in
 13 turn be sympathetic to her request for an adjournment, even if
 14 that means that Mr. Connolly's evidence cannot be concluded
 15 today.
 16 MR. SHERBORNE: My Lord, yes.
 17 MR. JUSTICE NICOL: I will deal with that as and when it arises.
 18 MR. SHERBORNE: I am very grateful, my Lord.
 19 MR. JUSTICE NICOL: So, your further examination-in-chief.
 20 MR. SHERBORNE: I am grateful. Mr. Connolly, I have just a few
 21 questions about Hicksville. Do you remember the trip in June
 22 2013, when Ms. Heard and her friends went to a trailer
 23 campsite, when Mr. Depp was present?
 24 A. Yes, I do remember.
 25 Q. Were you there?

[Page 907]

1 CONNOLLY - SHERBORNE
 2 A. I was, yes.
 3 Q. Were there other members of Mr. Depp's team there as well?
 4 A. One other, Nathan Holmes.
 5 MR. JUSTICE NICOL: Sorry, other members of his team, and what was
 6 your answer?
 7 THE WITNESS: Yes.
 8 MR. SHERBORNE: You said Nathan Holmes.
 9 A. Nathan Holmes, yes.
 10 Q. As far as security, if I can put it that way, is concerned,
 11 was there anyone other than you?
 12 A. No one.
 13 Q. What was your general recollection of the trip; was it a good
 14 trip, a bad trip?
 15 A. My general recollection of that trip was a good trip, yes.
 16 Yes.
 17 Q. Now, we understand that there was an argument at one stage in
 18 Mr. Depp's cabin; is that correct?
 19 A. So I was told. I did not witness this argument. I did not
 20 hear an argument.
 21 Q. Did you hear about anything which happened to the cabin, or
 22 not?
 23 A. I heard the following morning there was a light broken. I
 24 think there was a light broken.
 25 MR. JUSTICE NICOL: Just a minute. (Pause) Thank you.

[Page 908]

1 CONNOLLY - SHERBORNE
 2 MR. SHERBORNE: Was it ever suggested to you that the whole cabin
 3 had been smashed up and trashed?
 4 A. No.
 5 Q. Can I just ask you, then, a few questions about the south-east
 6 Asian train journey?
 7 A. Yes.
 8 Q. Mr. Depp mentioned this yesterday and he said that you were
 9 present; is that correct?
 10 A. Correct. Yes.
 11 Q. It was Mr. Depp and Ms. Heard's honeymoon, part of their
 12 honeymoon?
 13 A. That is correct.
 14 Q. In July 2015?
 15 A. Correct.
 16 Q. Did Mr. Depp take over the whole train?
 17 A. No, not at all, no.
 18 Q. Did you stay away from the couple or did you come into contact
 19 with them regularly, or ---
 20 A. I came into contact as far as dinner and excursions off the
 21 train, but they had their own private time on the train.
 22 Q. Now, it has been suggested by Ms. Heard that Mr. Depp punched
 23 Ms. Heard, attacked her, grabbed her by the throat, she
 24 screamed, and it caused her to fear for her life. If
 25 Ms. Heard had suffered any injuries on that trip, would that

[Page 909]

1 CONNOLLY - SHERBORNE
 2 have gone unnoticed by you?
 3 A. No. Not at all, no.
 4 Q. You worked for Mr. Depp. Did you treat Ms. Heard differently
 5 because you worked for Mr. Depp and not her?
 6 A. No, not at all. I looked after Amber. I afforded Amber the
 7 same professionalism, the same protection I gave to
 8 Johnny Depp.
 9 MR. JUSTICE NICOL: Just a minute.
 10 MR. SHERBORNE: His Lordship is taking a note.
 11 A. Sorry.
 12 Q. No one is criticising you at all. It is just quite useful
 13 after an answer to pause for a second. That is all I was
 14 going to ask.
 15 MR. JUSTICE NICOL: Thank you. Yes.
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 18
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 25

[Page 910]

1 CONNOLLY
 2 CROSS-EXAMINED BY MS. WASS
 3 MS. WASS: Mr. Connolly, I think Mr. Depp and Ms. Heard finally
 4 separated some time in late May/June 2016.
 5 A. That is correct.
 6 Q. You obviously had been working for Mr. Depp for a long time.
 7 When that separation took place, I think your immediate view
 8 was that you really did not want to be drawn into taking sides
 9 or anything like that; do you agree?
 10 A. I agree with that, correct.
 11 Q. Could you take volume 6, please, which is the red -- put your
 12 witness statement away. I think it is easier to do that. Put
 13 that file away. You will not be needing that.
 14 MR. JUSTICE NICOL: The space in the witness box is rather
 15 cramped, Mr. Connolly, so putting files away that are not
 16 needed is useful. (Pause)
 17 MS. WASS: Number 6 is red. If you open it up, you will see a tab
 18 with the number 119 on, which is the first tab. If you open
 19 behind 119 and turn the file on its side, can you go, with the
 20 bottom middle pages to 190 of that section, that schedule?
 21 A. 190?
 22 Q. 190. It is towards the back. (Pause) It should be in the
 23 middle, the number in the middle bottom of the page, as you
 24 look at it in landscape. (Pause)
 25 A. Page 190.

[Page 911]

1 CONNOLLY - WASS
 2 Q. Yes.
 3 A. Yes.
 4 Q. I am talking about ----
 5 MR. JUSTICE NICOL: The full reference is F697.190.
 6 MS. WASS: Do you have that now?
 7 A. Page 190, yes.
 8 Q. If you look at the box four down, you will see a text sent
 9 from you, Malcolm Connolly, to Amber Heard in June 2016? Do
 10 you see the text I am referring to?
 11 A. I do, yes.
 12 Q. I am going to read out what it says: "Hey, hi Amber, I will
 13 log this number now. Amber, I'm so glad not to have been
 14 dragged into this. It would have been impossible for me to
 15 address, really. I have the utmost respect for you both and
 16 I have always said to JD and anyone else that you have never
 17 been anything but respectful and professional" -- I think that
 18 must mean "in my company". It says "I", but it is probably
 19 some predictive text error. "As you understand, he is not
 20 only my boss, but I love and respect JD as a good friend also
 21 so it is devastating to see it has come to this and I hope
 22 some sort of deal can be made to sort this out amicably. He
 23 is hurting badly but coping. He has no choice, really. He is
 24 still trying to protect you, Amber." Did you send that text?
 25 A. Yes.

[Page 912]

1 CONNOLLY - WASS
 2 Q. You remember sending it?
 3 A. Yes.
 4 Q. Is it true that when you said, "I have always said to JD and
 5 anyone else that you have never been anything but respectful
 6 and professional in my company" ----
 7 A. Yes.
 8 Q. ---- that was your experience of Ms. Heard?
 9 A. Yes.
 10 Q. You went on to say, "... but, as you understand, he is not
 11 only my boss, but he is also a friend"?
 12 A. Yes.
 13 Q. So your starting point, if I can put it like this,
 14 Mr. Connolly, was that you respected and admired Ms. Heard; do
 15 you agree?
 16 A. Correct, yes.
 17 Q. You were very attached to Mr. Depp also and he was your boss?
 18 A. Correct, yes.
 19 Q. So you felt torn, and the last thing you wanted to do was to
 20 become involved in their domestic arguments. Is that what you
 21 are saying in that text?
 22 A. Yes.
 23 Q. That has changed now, has it not?
 24 A. No.
 25 Q. You have made a statement. It has just been pointed out to

[Page 913]

1 CONNOLLY - WASS
 2 you so I do not think you probably need to go back to it. It
 3 is dated 25th February 2020. That is the statement you were
 4 asked to identify. Do you agree that is the first time a
 5 statement of yours has been submitted to the court?
 6 A. Yes.
 7 Q. And today, you have come out with new recollections for the
 8 very first time?
 9 A. I do not understand.
 10 Q. Well, you heard the discussion, the legal discussion, when you
 11 were sitting in the witness box after you had taken the oath.
 12 Mr. Sherborne, Mr. Depp's barrister, wanted you to deal with
 13 two other incidents.
 14 A. Correct.
 15 Q. You have not forgotten that?
 16 A. No, no.
 17 Q. They took place in 2013 and 2015.
 18 A. That is correct.
 19 Q. So you are remembering now, and committing yourself in public
 20 for the first time, about events that took place, first of
 21 all, seven years ago, which is Hicksville; yes?
 22 A. I was never asked about it before.
 23 Q. All right, I understand that. So, for the first time, when
 24 you are asked about an event seven years ago, you have a
 25 recollection of the exact amount of damage that was done in a

[Page 914]

1 CONNOLLY - WASS
 2 trailer; is that your evidence?
 3 A. No.
 4 Q. What is your evidence?
 5 MR. JUSTICE NICOL: Just a minute. (Pause)
 6 THE WITNESS: I never seen any damage on the train ----
 7 MR. JUSTICE NICOL: Just a moment, please.
 8 THE WITNESS: I never actually seen ----
 9 MR. JUSTICE NICOL: Just a minute, please, Mr. Connolly, while
 10 I make a note. (Pause) Yes.
 11 THE WITNESS: I never actually saw any damage on the train.
 12 MS. WASS: Not the train, the trailer.
 13 A. Trailer.
 14 Q. I am talking about Hicksville?
 15 A. Yes, I never seen any damage.
 16 Q. Did you go inside the trailer?
 17 A. No.
 18 Q. You did not go inside the trailer?
 19 A. One time only when I arrived at Hicksville, to check out the
 20 place.
 21 Q. Let me get this straight. The party arrived at Hicksville on
 22 day 1?
 23 A. Yes.
 24 Q. You go inside the trailer?
 25 A. Yes.

[Page 915]

1 CONNOLLY - WASS
 2 Q. Did you ever see the trailer after that stage?
 3 A. No.
 4 Q. I think we can move on.
 5 MR. JUSTICE NICOL: Just a moment. Never saw the trailer after
 6 day 1. Day 1 was before any damage had been done?
 7 THE WITNESS: Yes, sir.
 8 MR. JUSTICE NICOL: Yes.
 9 MS. WASS: I am just waiting for my Lord to finish writing.
 10 MR. JUSTICE NICOL: Yes.
 11 MS. WASS: (To the witness) Your statement that was dated five
 12 years after the event, in 2020, deals with your recollection
 13 of events in 2015, do you agree, the trip to Australia?
 14 THE WITNESS: Yes.
 15 Q. What you have said in that statement is that you got a call
 16 from Jerry Judge, who, was he head of security?
 17 A. Yes.
 18 Q. So effectively your line manager or boss, I do not know ----
 19 A. Yes.
 20 Q. ---- how you want to put it. Mr. Judge effectively said,
 21 "Look, we have to get over to Mr. Depp's house urgently?"
 22 A. Yes.
 23 Q. Words to that effect?
 24 A. Words to that effect.
 25 Q. Do you remember sending texts, saying, "We are half an hour

[Page 916]

1 CONNOLLY - WASS
 2 away", I think you were saying "30 minutes away", "We are
 3 20 minutes away", "We are ten minutes away", during the
 4 journey?
 5 A. I do not recall sending those texts but it is standard
 6 operating procedure, so I would have done, yes.
 7 Q. All right.
 8 MR. JUSTICE NICOL: Just slow down, please. (Pause) Yes.
 9 MS. WASS: Am I right in saying that you and the security team
 10 were about, were in a place about half an hour away from the
 11 house that Mr. Depp was renting, where he was staying?
 12 THE WITNESS: Yes, 40 minutes.
 13 Q. You say when you arrived at the house there was an argument
 14 ongoing?
 15 A. That is correct, yes.
 16 Q. Were you able to understand what Mr. Depp was saying during
 17 the course of that argument?
 18 A. No.
 19 Q. Why?
 20 A. Because I was standing outside, and it is a substantial door
 21 timber, a massive timber door, I could hear a ruckus, but
 22 I could not hear the actual words that were being said.
 23 MR. JUSTICE NICOL: You could not hear because the door was in
 24 between you?
 25 THE WITNESS: Yes, sir.

[Page 917]

1 CONNOLLY - WASS
 2 MS. WASS: Was there a time when you did get inside the house?
 3 A. Yes.
 4 Q. And what sort of state did you find Mr. Depp in, when you got
 5 inside the house?
 6 A. Distraught.
 7 Q. Was he coherent?
 8 A. Yes.
 9 Q. Did he appear as if he had been drinking?
 10 A. It is hard to tell with Johnny, because he can take some
 11 amount of volume of alcohol. He was definitely having a
 12 conversation with me, straight as a die.
 13 Q. Straight as a die?
 14 A. Yes.
 15 Q. So, completely coherent?
 16 A. Yes, yes.
 17 Q. Intelligent, rational, all those things?
 18 A. I would not say -- I do not about rational, because he was in
 19 shock, the trauma of his injury.
 20 Q. Because part of his finger, his right middle finger, had
 21 been ----
 22 A. Removed.
 23 Q. ---- removed. Not only was he in a terrible state of shock,
 24 you say, I am going to suggest he was drunk, I think we have
 25 covered that, unless you want to say anything more about it?

[Page 918]

1 CONNOLLY - WASS
 2 A. He did not appear that drunk to me.
 3 Q. Did he appear as if he had taken drugs?
 4 A. No.
 5 Q. Are you familiar with what he is like when he has taken drugs?
 6 A. Medication, prescribed medication?
 7 Q. My fault for not being clear. I am talking about controlled
 8 drugs, illegal drugs, recreational drugs?
 9 A. I am never privy to that sort of behaviour.
 10 Q. You have never known him take drugs?
 11 A. Yes, I have known, but I have never seen it with my own eyes.
 12 Q. Mr. Depp, when you saw him, when you got to the house in
 13 Australia, he was absolutely filthy, was he not?
 14 A. Untidy.
 15 Q. No, he was filthy. He was covered in black paint and dirt,
 16 and he was dishevelled and did not appear as if he had washed;
 17 he was properly filthy?
 18 A. No.
 19 Q. No?
 20 A. No.
 21 Q. All right. And he was refusing to leave the house, was he
 22 not?
 23 A. On the first attempt, yes.
 24 MR. JUSTICE NICOL: Just a minute. (Pause) Yes.
 25 MS. WASS: Dr. Kipper was trying to persuade him to go with

[Page 919]

1 CONNOLLY - WASS
 2 security to leave the house?
 3 THE WITNESS: No.
 4 Q. You do not remember that?
 5 A. It never happened.
 6 Q. Do you remember Dr. Kipper being there?
 7 A. Dr. Kipper was not in the house when I extracted Johnny from
 8 the house.
 9 MR. JUSTICE NICOL: Just a minute. (Pause) So, your recollection
 10 is that Dr. Kipper was not there?
 11 THE WITNESS: Yes, sir.
 12 MR. JUSTICE NICOL: Thank you. Mr. Connolly, I just saw you shake
 13 your head. There needs to be an articulated answer, so that
 14 it can be recorded.
 15 THE WITNESS: I understand, sir.
 16 MR. JUSTICE NICOL: Good. Thank you.
 17 MS. WASS: (To the witness) Your statement that you made five
 18 years after this event says this, that you did not get
 19 Mr. Depp out of the house easily, but you eventually did, and
 20 you said: "I had the car door open and when we were outside
 21 Johnny said words to the effect of, 'Look at my finger, she's
 22 cut my fucking finger off. She smashed my hand with a vodka
 23 bottle", and you saw that his finger was a mess. He also told
 24 you that she had put a cigarette out on his cheek and you
 25 could see the mark on his face.

[Page 920]

1 CONNOLLY - WASS
 2 THE WITNESS: Yes.
 3 Q. That, Mr. Connolly, is not true?
 4 A. I can only say I was there, I witnessed it.
 5 Q. Mr. Depp has come out in your company with a variety of
 6 potential explanations to give to other people about how his
 7 finger was damaged, has he not?
 8 A. Not to my recollection, no.
 9 MR. JUSTICE NICOL: Just a minute. (Pause) Yes.
 10 MS. WASS: When you were going to the hospital, did you not
 11 discuss the lie that should be told to the hospital, that he
 12 was slicing onions when he cut his finger off?
 13 THE WITNESS: Yes.
 14 Q. So, there were other explanations being put forward?
 15 A. Only to protect Amber and to protect his, from the movie.
 16 MR. JUSTICE NICOL: At the moment, Mr. Connolly, you are being
 17 asked about whether other explanations for the injury to
 18 Mr. Depp's finger were being discussed.
 19 THE WITNESS: I understand, sir.
 20 Q. Do I understand your answer to be, yes, there were?
 21 A. Yes, sir.
 22 MR. JUSTICE NICOL: Thank you.
 23 MS. WASS: There was a suggestion that he had trapped the finger,
 24 or the part of the finger, in what I am going to describe or
 25 have been describing as accordion doors; do you know what

[Page 921]

1 CONNOLLY - WASS
 2 I mean by that?
 3 THE WITNESS: Yes, that was my story.
 4 Q. That was your story?
 5 A. Yes.
 6 Q. You cooked up that lie, did you?
 7 A. Yes.
 8 Q. There were accordion doors in the house?
 9 A. Correct.
 10 Q. They are sort of doors that have concertinaed ----
 11 A. The technical term is bi-folding.
 12 Q. Bi-folding doors, and they are the sort of door where getting
 13 your finger trapped can be very painful and can do the sort of
 14 injury that Mr. Depp had?
 15 A. No, there are safety devices installed in these doors, for
 16 children.
 17 Q. Would you please take up file number 7, do you have a file
 18 open in front of you -- leave number 6 out for the minute --
 19 but if you go to number 7 and go behind 5B. That should be a
 20 schedule in landscape. Do you see that?
 21 A. Yes.
 22 Q. Could you go to H30.6.
 23 A. Yes.
 24 Q. This is a very long text in that schedule. Can you see it is
 25 the longest one, one up from the bottom. Do you have it?

[Page 922]

1 CONNOLLY - WASS
 2 A. I have, yes.
 3 Q. That, we have heard evidence, and it is not disputed, was a
 4 text from Mr. Depp to Dr. Kipper, saying this: "Hi, Fucked
 5 man, had another one. I just cannot live like this, she's as
 6 full of shit as a Christmas goose. ...(reads to the words)...
 7 that is only released from a malicious, evil and vindictive
 8 cunt." Pausing there, was Mr. Depp talking like that to you
 9 about Ms. Heard on this occasion?
 10 A. No.
 11 Q. "But you know what, far more hurtful than her venomous and
 12 degrading endless educational ranting ...(reads to the
 13 words)... done me a most cruel favours, so I am sad." Then
 14 this bit, please: "I cut the top of my middle finger off.
 15 What should I do, except of course go to hospital. I'm so
 16 embarrassed for jumping into anything with her." Were you
 17 present when Mr. Depp sent that text to Dr. Kipper?
 18 A. I do not recall being present. If I was in his company,
 19 I have no knowledge of that text being sent.
 20 Q. But would you agree that it appears that Mr. Depp was
 21 accepting that he cut the top of his finger off in that text;
 22 is that how you read it?
 23 A. Yes, it is how it is worded, yes. But, I mean, if you -- you
 24 know, yes.
 25 Q. Yes?

[Page 923]

1 CONNOLLY - WASS
 2 A. Yes.
 3 Q. And was Mr. Depp demanding drugs when you arrived at the
 4 house?
 5 A. No.
 6 Q. I ought to make it plain, illegal drugs, not aspirin?
 7 A. No idea. Not from me.
 8 Q. If you look at the text straight after that, do you see the
 9 bottom one, this is the text to Mr. Holmes, who I think you --
 10 were you with Mr. Holmes when you went to the house?
 11 A. No.
 12 Q. No. This is the text from -- was Mr. Holmes already there?
 13 A. No.
 14 Q. So, Mr. Holmes, if he arrived at the house, would have arrived
 15 later?
 16 A. He may have done, yes.
 17 Q. What this says here, at the bottom, it is text from Mr. Depp
 18 to Mr. Holmes, following the text when he says he cut his
 19 finger off, five minutes later, he says: "Need more whitey
 20 stuff ASAP brother man and the E business." What is your
 21 understanding of what Mr. Depp was referring to, the "whitey
 22 stuff"?
 23 A. Probably cocaine.
 24 Q. And the "E business"?
 25 A. E business, Ecstasy.

[Page 924]

1 CONNOLLY - WASS
 2 MR. JUSTICE NICOL: Just a minute.
 3 MS. WASS: Now, the house was completely wrecked, was it not?
 4 THE WITNESS: I never seen the house completely wrecked. I only
 5 got as far as the front foyer and see the house, the front, as
 6 you walk in the house, there is the marble platform, three
 7 stairs down, I never got any further than that.
 8 Q. You could see into the house from, through the front door?
 9 A. No.
 10 Q. You could not see paint that had been graffitied all over the
 11 house?
 12 A. No.
 13 Q. You could not see damage?
 14 A. No.
 15 Q. You could not ---
 16 MR. JUSTICE NICOL: Just a minute. (Pause) Yes.
 17 MS. WASS: Could you see a broken window to the outside of the
 18 house?
 19 THE WITNESS: No.
 20 Q. Was this something that you learned about later?
 21 A. Yes.
 22 Q. Did you learn later that the damage was so extensive, the
 23 discussion was around the fact it might have amounted to
 24 \$100,000?
 25 A. I recall hearing that, yes.

[Page 925]

1 CONNOLLY - WASS
 2 Q. Did that surprise you?
 3 A. Yes.
 4 Q. You have said in your statement that as far as you were
 5 concerned, Ms. Heard was uninjured.
 6 A. That is correct, yes.
 7 Q. What opportunity did have you to look at Ms. Heard to say
 8 that?
 9 A. Well, as I was sat outside trying to get Johnny in the car,
 10 Amber came to the front door, screaming and shouting.
 11 MR. JUSTICE NICOL: Just a minute. (Pause) Yes.
 12 MS. WASS: I think her arms were bare, she was wearing something
 13 with bare arms?
 14 THE WITNESS: Yes.
 15 Q. Did you see any scratches to her arms?
 16 A. No.
 17 Q. Did you look at her arms?
 18 A. Yes.
 19 Q. You are absolutely sure there were no scratches?
 20 A. Yes, absolutely sure.
 21 Q. Were you ---
 22 MR. JUSTICE NICOL: Just a minute, please. Just pause, please,
 23 Ms. Wass. (Pause) So, you did not see any scratches on her
 24 arms?
 25 THE WITNESS: No, sir.

[Page 926]

1 CONNOLLY - WASS
 2 MR. JUSTICE NICOL: Then, could you repeat your last question.
 3 MS. WASS: I was about to ask her about her face, whether you
 4 noticed a bruise on her face?
 5 THE WITNESS: No.
 6 Q. You would have seen a bruise had it been on her face; is that
 7 your evidence?
 8 A. Yes.
 9 Q. I am going to ask you to look at some transcripts of a
 10 recording that was made in that house on 8th March; right?
 11 So, could you put away the file in front of you.
 12 MR. JUSTICE NICOL: You can put away file 7?
 13 MS. WASS: Sorry, put away file 6, if that makes life a bit
 14 easier. (Pause)
 15 MR. JUSTICE NICOL: Did you say file 5?
 16 MS. WASS: File 5, and it is the first tab, 156A.
 17 THE WITNESS: Sorry, can you repeat that?
 18 MS. WASS: File 5, the first tab should say 156A. Does that not
 19 say 156A? (Pause)
 20 THE WITNESS: 156A? 157.
 21 MR. JUSTICE NICOL: There are dividers within each volume, and
 22 Ms. Wass is asking you to look for the divider that is
 23 labelled 156A. It should be right at the front of the
 24 volume 5. Right at the front, Mr. Connolly, very close to the
 25 front.

[7] (Pages 923 to 926)

[Page 927]

1 CONNOLLY - WASS
 2 A. 156 -- (Pause) Sorry, it is just a wee paper thing.
 3 Q. That is all right. These are awkward materials and we have
 4 been learning to navigate our way around them, but it does
 5 take a little time. Have you now found tab 156A?
 6 A. 156A, yes.
 7 MR. JUSTICE NICOL: Good, all right. Just wait for Ms. Wass's
 8 question.
 9 MS. WASS: Is the first page, does it says at the bottom
 10 right-hand corner, F978.62?
 11 THE WITNESS: It does, yes.
 12 Q. Turn over the page, please, you can see at the top it says
 13 "JD"?
 14 A. Yes.
 15 Q. Do you see that? I am going to ask you to listen to a very
 16 small portion of this, and then I will ask you some questions.
 17 Follow it on the transcript.
 18 MR. JUSTICE NICOL: Ms. Wass, I think something needs to be done.
 19 MS. WASS: Yes, excuse me. We need to play something, yes.
 20 (Pause) I do not know if we can turn the volume up. (Pause)
 21 MR. JUSTICE NICOL: Can we turn the volume up a little bit,
 22 please?
 23 (Recording played to the court)
 24 MS. WASS: Thank you. Do you recognise that as Mr. Depp's voice?
 25 THE WITNESS: Yes.

[Page 928]

1 CONNOLLY - WASS
 2 Q. Was that the sort of condition that he was in when you saw him
 3 at the house?
 4 A. More or less, yes.
 5 Q. This recording, just so you know, was recorded at the house;
 6 it is a five-hour recording. The recording device was simply
 7 left on, and picked up conversations between Mr. Depp, who we
 8 can hear there; later on Dr. Kipper; and then later on
 9 Jerry Judge. Who was at the house, Mr. King and Jerry Judge,
 10 was it?
 11 A. No.
 12 Q. Who was at the house, who remained at the house?
 13 A. Mr. King, I believe.
 14 Q. And Jerry Judge?
 15 A. No.
 16 Q. We will see a lot of speech by Jerry Judge on this transcript,
 17 I will ask you about that. You accept that Dr. Kipper was
 18 there, or not?
 19 A. Not, not what I arrived.
 20 Q. Not when you arrived. Are you saying that by the time
 21 Dr. Kipper arrived, Mr. Depp had gone?
 22 A. I do not -- I have no recollection that Dr. Kipper was at the
 23 house when Johnny was there at all. Johnny was not at the
 24 house when Dr. Kipper arrived on the scene. Johnny was
 25 already in my flat, where I called Dr. Kipper to my flat to

[Page 929]

1 CONNOLLY - WASS
 2 address Johnny's trauma.
 3 Q. Do you think after five years you could have got this wrong,
 4 in terms of the order in which things happened?
 5 A. No.
 6 Q. All right. Could you then go, please, to page F978.81, in
 7 fact start with F978.80.
 8 A. Sorry, 978.81?
 9 Q. Turn over to the page before, we can just see who is speaking.
 10 Mr. Connolly, are you on 978.80 at the bottom?
 11 A. Yes.
 12 Q. Can you see that at line 21, "JJ"?
 13 A. Yes.
 14 Q. Now, just so that you know, this is a transcript that has been
 15 approved by Mr. Depp's legal team. This is not the
 16 defendants' transcript. There is a defendants' transcript,
 17 but I am taking you through the Depp-approved transcript and
 18 it attributes what is being said to Jerry Judge. Do you
 19 understand that?
 20 A. Yes.
 21 Q. Do you want to reconsider your answer about Jerry Judge being
 22 at the house, remaining at the house?
 23 A. Jerry Judge was at the house after the incident, not when
 24 I extracted Johnny from the situation.
 25 MR. JUSTICE NICOL: Just a moment, please. (Pause) Are you saying

[Page 930]

1 CONNOLLY - WASS
 2 that if Jerry Judge arrived at the house that was after you
 3 had left?
 4 THE WITNESS: Yes, sir.
 5 Q. And you left with Mr. Depp?
 6 A. Yes, sir.
 7 MS. WASS: So the passage I am going to ask you about is
 8 attributable to Jerry Judge. Do you agree, from the
 9 transcript?
 10 A. Yes.
 11 Q. Go over the page, please. Line 7, Mr. Judge says, and he is
 12 talking about Ms. Heard: "She has scratches on her left arm,
 13 that Danny told me" -- it says Danny, it might not be Danny --
 14 "that somebody told me about. I've seen those scratches
 15 before on a lot of people", and Mr. Judge is suggesting there
 16 that they are self-inflicted. I am not asking you about
 17 whether they are self-inflicted or not. I am asking you, if
 18 Mr. Judge had described scratches on Ms. Heard's left arm, how
 19 is that something that you could have missed, do you think?
 20 A. They simply were not there when I extracted Johnny, the
 21 scratches were not there. Jerry Judge had four hours at that
 22 house cleaning up after I left with Johnny. So, Jerry Judge
 23 had four hours with Amber. I had roughly 30 minutes, and seen
 24 her from a distance.
 25 Q. Your suggestion is that if she had scratches on her arm, they

[Page 931]

1 CONNOLLY - WASS
 2 must have occurred after Mr. Depp had left?
 3 MR. JUSTICE NICOL: Well, I think that I noticed that
 4 Mr. Connolly's last remark was "I saw her from a distance".
 5 MS. WASS: Thank you, my Lord.
 6 (To the witness) Is your evidence, I do not want to be
 7 unfair to you, that you believe she did not have scratches?
 8 THE WITNESS: That is correct, yes.
 9 Q. But it might be the case that because of the distance, and of
 10 course the fact that you were looking after your boss in
 11 fairly dramatic circumstances, that you may have missed them?
 12 A. It appeared to me at the time Amber was completely unharmed.
 13 Q. Do you agree that given the circumstances, you may have missed
 14 them?
 15 A. No.
 16 Q. All right. You are trying to be fair, are you, to both
 17 parties in this case?
 18 A. Yes.
 19 Q. Not a question of you simply coming here to support your boss?
 20 A. Not at all, no.
 21 Q. Can you go to the following page, in fact, start at the bottom
 22 of the page we are on, the very last line: "She said on
 23 Friday", do you see that?
 24 A. Yes.
 25 Q. "He put a cigarette and burnt his own face with a cigarette".

[Page 932]

1 CONNOLLY - WASS
 2 A. That is -- yes.
 3 Q. Yes?
 4 A. Yes.
 5 Q. You say "yes" as if you agree with that?
 6 A. Yes, that is what Amber said.
 7 Q. That is what she said that Mr. Depp put a cigarette out on his
 8 own face?
 9 A. Yes, probably that is what she said, yes. That is what she
 10 would have said, yes.
 11 MR. JUSTICE NICOL: Just a minute. We can see what the transcript
 12 says but, Mr. Connolly, did Ms. Heard say anything about
 13 Mr. Depp putting a cigarette out on his own face in your
 14 presence?
 15 THE WITNESS: Not in my presence, no.
 16 MS. WASS: Then, Mr. Judge says, makes this observation, and
 17 I want to know whether you agree with it: "He's not well, we
 18 need to help him out in every way we possibly can."
 19 A. Yes.
 20 Q. Was that your view as well?
 21 A. Yes.
 22 Q. That he was not well?
 23 A. Yes.
 24 MR. JUSTICE NICOL: Just a minute. Well, the second part of that
 25 sentence is, or the next thing that Mr. Judge says is: "We

[Page 933]

1 CONNOLLY - WASS
 2 need to help him out in every way we possibly can." Does that
 3 reflect your view as well?
 4 THE WITNESS: Yes, sir.
 5 MR. JUSTICE NICOL: Yes.
 6 MS. WASS: Can you go to divider 157, which is the same file, but
 7 a couple of tabs forward.
 8 MR. JUSTICE NICOL: Have you been able to find 157?
 9 THE WITNESS: Yes.
 10 MS. WASS: Again, this is another transcript of the Australian
 11 house, in the Australian house, and could you look at page 3
 12 of that, the internal page 3, which is F987.3.
 13 A. Okay, yes.
 14 Q. Do you see at line 18, again, Mr. Judge: "He basically
 15 completely cut the top of his finger off on a broken bottle,
 16 and we found the piece and we had to put it on ice."
 17 A. I do not know who he is sending this text to, I mean who ---
 18 Q. This is not a text, Mr. Connolly.
 19 A. This is the audio? Okay.
 20 Q. This is the audio. This is Mr. Judge saying, just so that you
 21 are aware -- and if necessary we can locate this exact piece
 22 of recording, but this is the claimant's recording, this is
 23 Mr. Depp's approved recording -- "He basically completely cut
 24 the top of his finger off on a broken bottle and we found the
 25 piece and we had to put it in ice."

[Page 934]

1 CONNOLLY - WASS
 2 A. I have no recollection of that conversation.
 3 Q. No. Your account was that Mr. Depp immediately said to you
 4 that Ms. Heard had cut the top of his finger off?
 5 A. Yes.
 6 MR. JUSTICE NICOL: Well, I think you have said that you were not
 7 present when Mr. Judge was having this conversation; is that
 8 right?
 9 A. That is correct, sir. That is correct.
 10 MR. JUSTICE NICOL: Yes.
 11 MS. WASS: And what you have done, I am afraid, Mr. Connolly,
 12 having started from a position where you did not want to
 13 become embroiled in the very tempestuous relationship between
 14 Mr. Depp and Ms. Heard, is that whether you have been
 15 pressurised or not, five years after the event, you have come
 16 out with an account in order to support your boss's case
 17 against the newspaper in this action?
 18 A. Yes, that is correct. I want the truth out, yes.
 19 Q. It is not true, what you have said?
 20 A. Yes, it is true. My account is true.
 21 MS. WASS: My Lord said I could have an opportunity to deal with
 22 anything that arose as a result of further questions this
 23 morning. Could I have five minutes with those who instruct me
 24 because there is a matter that may be important? Rather than
 25 making Mr. Connolly come back on another occasion, I can

[Page 935]	[Page 937]
<p>1 CONNOLLY - WASS</p> <p>2 either deal with it now, if I need to deal with it at all, or</p> <p>3 I will simply conclude my questions without more.</p> <p>4 MR. JUSTICE NICOL: Mr. Sherborne, it seems to me that it would be</p> <p>5 more convenient, both for Mr. Connolly and for the court, if</p> <p>6 Ms. Wass had the opportunity now to take the further</p> <p>7 instructions.</p> <p>8 MR. SHERBORNE: Of course, my Lord, yes.</p> <p>9 MR. JUSTICE NICOL: What I think we will do, Ms. Wass, is take a</p> <p>10 break now, rather than a little later, so I will say ten</p> <p>11 minutes.</p> <p>12 MS. WASS: Thank you.</p> <p>13 MR. JUSTICE NICOL: You can tell me if that is not long enough for</p> <p>14 you to get your instructions, but I will say ten minutes.</p> <p>15 MS. WASS: Thank you very much.</p> <p>16 MR. JUSTICE NICOL: Mr. Connolly, you are in the middle of giving</p> <p>17 your evidence. I would say this to every witness who is in</p> <p>18 the middle of giving their evidence when a break is taken.</p> <p>19 You must not talk about it to anybody at all. Do you</p> <p>20 understand that?</p> <p>21 THE WITNESS: I understand, sir, yes.</p> <p>22 MR. JUSTICE NICOL: That includes anybody from the claimant's</p> <p>23 legal team who you may have been in contact with prior to this</p> <p>24 morning.</p> <p>25 THE WITNESS: Of course, sir. I understand, sir.</p>	<p>1 CONNOLLY - WASS</p> <p>2 A. 24, sorry, yes.</p> <p>3 Q. ---- there is speech attributable to JJ, Jerry Judge?</p> <p>4 A. Yes.</p> <p>5 Q. And what Mr. Judge says -- and it is about Ms. Heard,</p> <p>6 I suggest -- is this: "She's got a bruise here, she's got a</p> <p>7 bruise underneath. She hit him. She slapped him yesterday."</p> <p>8 Mr. Judge is obviously suggesting that Ms. Heard had slapped</p> <p>9 Mr. Depp, but what I am interested in your help with is the</p> <p>10 bruise. Are you saying you did not see a bruise on Ms. Heard?</p> <p>11 A. No, I have never seen a bruise.</p> <p>12 Q. So, if Mr. Judge saw a bruise, you are saying you did not see</p> <p>13 it at the time?</p> <p>14 A. I did not see it at the time.</p> <p>15 Q. I think we can put that file away, then, and could you get</p> <p>16 file 5.1?</p> <p>17 MR. JUSTICE NICOL: Sorry, 5.1?</p> <p>18 MS. WASS: Yes. Could you go behind divider 196B?</p> <p>19 MR. JUSTICE NICOL: Have you found tab 196B.</p> <p>20 A. Yes.</p> <p>21 MS. WASS: Is that a photocopy of a diary entry?</p> <p>22 A. I do not know.</p> <p>23 Q. Does it say "Smithsons" at the bottom in typeface?</p> <p>24 A. Yes.</p> <p>25 Q. Does it say at the top ----</p>
[Page 936]	[Page 938]
<p>1 CONNOLLY - WASS</p> <p>2 MR. JUSTICE NICOL: All right. We will take a ten-minute break.</p> <p>3 Thank you.</p> <p>4 (A short break)</p> <p>5</p> <p>6 MS. WASS: Thank you for the time, my Lord. There is one matter</p> <p>7 I forgot to ask Mr. Connolly about, which I will deal with</p> <p>8 first, and then I will ask something about the new material</p> <p>9 which emerged this morning. Mr. Connolly, have you still got</p> <p>10 file 5 in front of you?</p> <p>11 A. Yes.</p> <p>12 Q. Are you behind divider 157?</p> <p>13 A. Yes.</p> <p>14 Q. Can you then turn slightly ahead in that section to F987.11?</p> <p>15 A. 911?</p> <p>16 Q. No, 987.11.</p> <p>17 A. Yes.</p> <p>18 Q. And can you see at line 24, there is speech attributable to</p> <p>19 Jerry Judge, JJ?</p> <p>20 A. At number 9?</p> <p>21 Q. No, page F987.11?</p> <p>22 A. Correct, yes.</p> <p>23 Q. Have you got that?</p> <p>24 A. Yes.</p> <p>25 Q. Down at the bottom of the page, at line 24 ----</p>	<p>1 CONNOLLY - WASS</p> <p>2 MR. JUSTICE NICOL: Just a minute, is this the first page of 196B?</p> <p>3 MS. WASS: Yes, it should be 1207.5.</p> <p>4 MR. JUSTICE NICOL: Then I have a different page. You said</p> <p>5 1207.5?</p> <p>6 MS. WASS: 1207.5.</p> <p>7 MR. JUSTICE NICOL: Just a moment. (Pause)</p> <p>8 MS. WASS: Does yours have "July 27th, Singapore" at the top?</p> <p>9 A. Yes.</p> <p>10 MR. JUSTICE NICOL: I have sorted it out.</p> <p>11 MS. WASS: Does my Lord have the document itself?</p> <p>12 MR. JUSTICE NICOL: Yes, it appears to be a handwritten document.</p> <p>13 MS. WASS: Yes.</p> <p>14 MR. JUSTICE NICOL: And there is a date of July 27th.</p> <p>15 MS. WASS: Yes. Mr. Connolly, the Singapore trip, or the trip to</p> <p>16 south-east Asia was around the 27th July; do you agree.</p> <p>17 A. I agree, yes.</p> <p>18 Q. 2015. The date 2015 is not on that diary entry, but that is</p> <p>19 the date of the trip, the honeymoon trip?</p> <p>20 A. Yes.</p> <p>21 Q. And this is an extract of Ms. Heard's diary, and it says at</p> <p>22 the top "Arrived in Singapore" and she says the hotel they are</p> <p>23 staying in. Can you go to the bottom of that page, five lines</p> <p>24 up: "After three hours of sleep and the terrible fight, we</p> <p>25 got in last night. We are both walking zombies today"; do you</p>

[10] (Pages 935 to 938)

[Page 939]

1 CONNOLLY - WASS
 2 see that?
 3 A. Yes.
 4 Q. Can you go two pages ahead to page 1207.9. Can you see that
 5 page?
 6 A. Yes.
 7 Q. And in the middle between the two hole punches, over to the
 8 right, there is a sentence that begins "A night"
 9 MR. JUSTICE NICOL: Just a moment. (Pause) Yes. Have you got
 10 that, Mr. Connolly?
 11 A. Yes, sir.
 12 MS. WASS: It reads as follows: "A night that ended at 3.30 and
 13 was brutal, uninterrupted" ----
 14 MR. SHERBORNE: No, "brutally interrupted" ----
 15 MS. WASS: "Brutally uninterrupted by the train's ----
 16 MR. SHERBORNE: No, "interrupted".
 17 MR. JUSTICE NICOL: I think it says "interrupted".
 18 MS. WASS: Yes, I agree with both people who are correcting me.
 19 "A night that ended at 3.30 and was brutally interrupted by
 20 the train's imminent arrival to the Singapore station too
 21 early this morning. After three hours of sleep, it had felt
 22 like an even more brutal heart hangover. Hurt last night was
 23 particularly bad. We finally fell asleep with one another
 24 smashed together in desperate childlike anger, fear and love."
 25 Then the final passage, please, over on the following page,

[Page 940]

1 CONNOLLY - WASS
 2 which is the last page of that section, again in between the
 3 two hole punches, a passage that reads, "Our fight was
 4 terrible". Do you see that, Mr. Connolly?
 5 A. Yes.
 6 Q. "Our fight was terrible. J finally, at one point, found
 7 himself with his shirt wrapped around my neck. Amazing to
 8 think about precision/coordination that required considering
 9 the case circumstances. He hit me several times. I don't
 10 even know how I wound up with this huge rather annoying knot
 11 on the back of my head. Fuck, I hate that. I hate that
 12 I allow it to buy never using that as a line for which I stand
 13 my ground. Where are my lines? Do I have any left?" Now,
 14 Mr. Connolly, you said you were present on the Singapore
 15 train?
 16 A. Yes.
 17 Q. You were not in the same cabin, obviously, as Mr. Depp and
 18 Ms. Heard. You were in a different carriage?
 19 A. Completely. No, same carriage, different cabin.
 20 Q. Same carriage?
 21 A. Same carriage, at the end. I was maybe three or four doors
 22 down.
 23 Q. Three or four doors down?
 24 A. Yes.
 25 Q. So, if a fight had taken place, at 3.30 in the morning, do you

[Page 941]

1 CONNOLLY - WASS
 2 think you would necessarily have known about it?
 3 A. I would never have known about it.
 4 MR. JUSTICE NICOL: Just a minute. (Pause) Thank you.
 5 MS. WASS: Thank you, Mr. Connolly. That is all I ask.
 6 THE WITNESS: Thank you.
 7 MR. JUSTICE NICOL: Yes, Mr. Sherborne.
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[Page 942]

1 CONNOLLY
 2 RE-EXAMINED BY MR. SHERBORNE
 3 MR. SHERBORNE: Mr. Connolly, just starting with Hicksville, if I
 4 may, you were asked a couple of questions about that, and to
 5 be fair to you, you clearly said in answer to the questions
 6 I asked you that you did not see any damage done, but that you
 7 have been told about it; is that correct?
 8 A. Yes.
 9 Q. And what you said you had been told about was damage to a
 10 light fitting?
 11 A. Yes.
 12 Q. Can I just ask you a couple of questions because of what was
 13 put by Ms. Wass to Mr. Depp about the damage. Ms. Wass put to
 14 Mr. Depp ----
 15 MR. JUSTICE NICOL: Now, Mr. Sherborne, re-examination is intended
 16 to deal with matters put to this witness in cross-examination.
 17 MR. SHERBORNE: Yes. I understand that, my Lord, but what was put
 18 to him is that there was a whole lot of damage done and
 19 Ms. Wass, in her questions to Mr. Depp, said that his security
 20 team -- this is how it arose -- went to see the management of
 21 Hicksville, and they had to sort out making reparation for the
 22 extensive damage. I do not know if your Lordship remembers
 23 that, but that was put to Mr. Depp and he said no, that is not
 24 what happened, he went and sorted it himself.
 25 Mr. Connolly gave evidence that he was the only security

[Page 943]

1 CONNOLLY - SHERBORNE
 2 member there. I am just going to ask him this. Mr. Connolly,
 3 did you go and see the managers or owners of the campsite in
 4 order to sort out paying for any damage?
 5 A. No.
 6 MR. SHERBORNE: My Lord, that is all I was going to ask.
 7 MR. JUSTICE NICOL: Okay.
 8 MR. SHERBORNE: Can I ask you about the south-eastern train?
 9 MR. JUSTICE NICOL: We have called it the south-eastern train, but
 10 it is the South-East Asia train.
 11 MR. SHERBORNE: I am sorry, my Lord. I have seen at least two
 12 different descriptions of it. I am tempted to call it the
 13 Orient Express.
 14 MR. JUSTICE NICOL: That may not be quite right. Anyway, we now
 15 know it is the South-East Asia train.
 16 MR. SHERBORNE: Mr. Connolly, you were asked about an entry in a
 17 diary that Ms. Heard wrote to herself. Did you ever see this
 18 diary before?
 19 A. No, never.
 20 Q. We have seen her say in her diary that she was hit by Mr. Depp
 21 and that she suffered injury as a result. Did you ever see
 22 any injuries to Ms. Heard on the trip on the South-East Asian
 23 train?
 24 A. No, never.
 25 Q. Did she ever tell you that she had received any injuries on

[Page 944]

1 CONNOLLY - SHERBORNE
 2 the South-Eastern train?
 3 A. No.
 4 Q. Did she tell you that Mr. Depp had hit her?
 5 A. No.
 6 Q. If she had suffered these injuries, would you or would you not
 7 have seen them?
 8 A. I would have seen them.
 9 Q. Can I ask you, then, about Australia. There were just a
 10 couple of small points you were asked about. I can take you
 11 back to the text, but there is a text from Nathan Holmes to
 12 Mr. Depp that you were shown by Ms. Wass; do you remember?
 13 MR. JUSTICE NICOL: To or from?
 14 MR. SHERBORNE: It was to and from Mr. Depp to Mr. Holmes, but
 15 particularly there was one from Mr. Depp to Nathan Holmes.
 16 A. Yes, I remember.
 17 Q. I think it referred to "whitey stuff" and "E"?
 18 A. Yes.
 19 Q. Did you see that text ever before?
 20 A. No.
 21 Q. Did you see any drugs passing between Mr. Holmes and Mr. Depp
 22 in Australia?
 23 A. No. That would be completely kept from me and Jerry Judge.
 24 MR. JUSTICE NICOL: Just a minute. (Pause)
 25 MR. SHERBORNE: I am ----

[Page 945]

1 CONNOLLY - SHERBORNE
 2 MR. JUSTICE NICOL: Just a minute. (Pause) Yes.
 3 MR. SHERBORNE: I am not going to ask you, Mr. Connolly, why you
 4 were shown that text. I am just going to move on to the tape.
 5 You were played a tape recording. I think it was a tape that
 6 was left on by Ms. Heard in Australia for several hours and
 7 you were played the beginning of that; do you remember?
 8 A. Yes.
 9 Q. And you were asked whether it was Mr. Depp's voice that you
 10 heard, and you said it was?
 11 A. Yes.
 12 Q. And Mr. Depp, you said, it was put to you, was upset and angry
 13 and you said that that was how you remember him being.
 14 A. Yes.
 15 Q. Can you help this court why Mr. Depp was upset and angry?
 16 A. He was in a lot of pain, a lot of distress and shock. You
 17 know, he was in shock, distress, pain.
 18 Q. And we have heard him angry, saying things about Ms. Heard.
 19 Did he tell you why he was angry with Ms. Heard?
 20 A. Yes. His words were, "She cut my fucking finger off".
 21 MR. JUSTICE NICOL: Just a minute. (Pause) Yes.
 22 MR. SHERBORNE: So am I right in saying that the first thing he
 23 said to you was that Ms. Heard had cut his fucking finger off.
 24 A. That was the first words when we got outside. The first words
 25 he said to me were, "Give me a fucking minute, Malcolm" when I

[Page 946]

1 CONNOLLY - SHERBORNE
 2 tried to remove him from the premises.
 3 MR. JUSTICE NICOL: Just a minute: "The first words he said to
 4 me"?
 5 MR. SHERBORNE: Can you repeat your answer slowly? It is quite
 6 fast and if you can raise your voice.
 7 A. The first words Johnny said to me when I arrived at the house,
 8 when I tried to extract him from the situation, were, "Just
 9 give me a fucking minute, Malcolm."
 10 MR. JUSTICE NICOL: "Just give me a fucking minute" and then did
 11 you add something else?
 12 A. No, sir, no.
 13 MR. SHERBORNE: The first words were that she had cut his finger
 14 off.
 15 MR. JUSTICE NICOL: No, just a moment. I thought that you said
 16 just a moment ago, "The first words he said to me when I
 17 arrived were, 'Just give me a fucking minute'".
 18 A. That is correct, sir, when I tried to extract him from the
 19 house, yes. That was the first words Johnny Depp said to me
 20 that day.
 21 MR. SHERBORNE: Mr. Connolly, I just want to be clear. The first
 22 time you answered the question, you said, "The first words he
 23 said to me were, 'She cut my fucking finger off. Just give me
 24 a minute.'"
 25 A. I do apologise. Those words were said when I removed him from

[Page 947]

1 CONNOLLY - SHERBORNE
 2 the premises and tried to get him into the car. He stood on
 3 the driveway, holding his hand, and said, "She has just cut my
 4 fucking finger off". I should have made it clear that was the
 5 first words he said when I got outside the house.
 6 Q. I just want to ask, you used the term "extract". You were
 7 dealing with a difficult situation; yes?
 8 A. Yes.
 9 Q. Is it something that you are inexperienced in dealing with?
 10 A. Yes.
 11 Q. You are inexperienced in dealing with it?
 12 A. I am so sorry, I misheard. I am experienced in dealing, not
 13 inexperienced.
 14 Q. Can you just explain very briefly what experience you have in
 15 dealing with these situations?
 16 A. I am an ex-prison officer for HMP Pentonville and I was
 17 trained in extraction, cell extraction. I was also a member
 18 of the British Tornado team, so the guys who are going to take
 19 the prisoners back on a riot. So, you know, I am trained in
 20 extraction, I am trained in pacifying, I am trained to spot
 21 bullies, I am trained in bruising patterns.
 22 Q. Sorry, did you say "bruising patterns"?
 23 A. Yes. Yes, people's demeanour when they are being bullied, the
 24 way they are around the bully. Without saying a word, you are
 25 trained to spot that by the establishment, by the Home Office.

[Page 948]

1 CONNOLLY - SHERBORNE
 2 Q. How many years did you ---
 3 A. Two years.
 4 MR. JUSTICE NICOL: As a prison officer?
 5 THE WITNESS: Yes, sir.
 6 MR. SHERBORNE: So I understand, you arrived at the door, Mr. Depp
 7 said, "Just give me a minute", and then you went to get him
 8 out and the first thing he said was "she's cut my fucking
 9 finger off"?
 10 A. Yes.
 11 Q. You explained to Ms. Wass that other explanations were arrived
 12 at for the finger; is that correct?
 13 A. That is correct, yes.
 14 Q. Why were other explanations sought?
 15 A. To protect production and also the usual victim. I see it in
 16 the prison, the usual victim pattern is to protect the abuser,
 17 for some reason, you know. The psychological bullying,
 18 physical bullying, but they fit the same criteria, they never
 19 come forward with the information.
 20 Q. We heard about the accordion doors, which I think was
 21 something you thought up?
 22 A. Yes.
 23 Q. These various other explanations, were they true?
 24 A. No.
 25 Q. What was the truth?

[Page 949]

1 CONNOLLY - SHERBORNE
 2 A. He got his finger ---
 3 MR. JUSTICE NICOL: Well, Mr. Sherborne, you are asking what was
 4 the true explanation for how ---
 5 MR. SHERBORNE: I will move on, my Lord.
 6 MR. JUSTICE NICOL: Because Mr. Connolly was not present when the
 7 injury took place.
 8 MR. SHERBORNE: My Lord, I know, but Mr. Connolly was not present
 9 when a lot of things were put by Ms. Wass that were said by
 10 other people.
 11 MR. JUSTICE NICOL: All right. All right.
 12 MR. SHERBORNE: I will move on, my Lord.
 13 MR. JUSTICE NICOL: Yes.
 14 MR. SHERBORNE: Can I ask you about the cigarette burn. You
 15 mentioned that Mr. Depp had said that she had put a cigarette
 16 out on his face?
 17 THE WITNESS: Yes.
 18 Q. Did you see the cigarette burn?
 19 A. Yes.
 20 Q. Can I ask you to look at a photograph for us. It should be in
 21 file 6. It is the red file to your left. Turn to tab 148B.
 22 Then there should be a page which ---
 23 MR. JUSTICE NICOL: Just hold on a moment.
 24 MR. SHERBORNE: Sorry, my Lord?
 25 MR. JUSTICE NICOL: I said just hold on a moment. (Pause) I think

[Page 950]

1 CONNOLLY - SHERBORNE
 2 148, I have that tab, and then I have further lettered
 3 subdivisions. Have you got that as well?
 4 THE WITNESS: Yes.
 5 MR. JUSTICE NICOL: All right.
 6 MR. SHERBORNE: 148B, my Lord.
 7 MR. JUSTICE NICOL: Yes.
 8 MR. SHERBORNE: Do you have behind B a page which is numbered on
 9 the bottom right-hand corner F894.052?
 10 THE WITNESS: Yes.
 11 Q. Can you help us as to -- this is Mr. Depp lying in the
 12 hospital?
 13 A. Yes.
 14 Q. And we can see his face, and then we can see something on the
 15 right, a mark, a large mark on the left side of his face?
 16 A. On the right side of his face.
 17 Q. Right side of his face. Can you help us at all as to what
 18 that mark is?
 19 A. That is the said cigarette burn.
 20 Q. You can put that file away, thank you. You were then taken to
 21 two -- I am not going to take you there -- but you were taken
 22 to two parts of the transcript of events that took place after
 23 you left, you had extracted Mr. Depp from the situation. Do
 24 you remember being taken to two passages?
 25 A. Yes.

[Page 951]

1 CONNOLLY - SHERBORNE

2 Q. The first was one where Mr. Judge is on the phone, according

3 to the transcript, with someone, discussing Mr. Depp's finger,

4 and that is the one where it says: "He basically", and then

5 it says, "(indiscernible) completely cut the top of his finger

6 off on a broken bottle." Do you know who Mr. Judge was on the

7 phone to when he gave that account?

8 A. No.

9 Q. You were then taken to a second passage, relating to Mr. Judge

10 talking again after you had left, when he talked about

11 Ms. Heard having a bruise here, I think he says: "She's got a

12 bruise. She's got a bruise underneath", and we do not know

13 what it says, then "she hit him, she slapped him yesterday".

14 Just dealing first of all with "got a bruise underneath", do

15 you know where Mr. Judge was saying this bruise was,

16 underneath what?

17 A. No.

18 Q. Here, Mr. Judge is saying that Ms. Heard has said that "she

19 hit him, she slapped him", as in Ms. Heard hit and slapped

20 Mr. Depp. Is this something that you -- Ms. Heard hitting or

21 slapping Mr. Depp, is that something that you have heard

22 before?

23 A. I have heard before, yes.

24 Q. So, it is not a one-off that Ms. Heard hit Mr. Depp, but ----

25 MR. JUSTICE NICOL: Is the question, had you heard about this

[Page 952]

1 CONNOLLY - SHERBORNE

2 before, are we talking about in Australia?

3 THE WITNESS: In Australia and in Los Angeles.

4 MR. SHERBORNE: Can I show you a document. It is file 8. If you

5 take file 8, to your right-hand side, and turn to tab 59.

6 Then it should be on the right-hand side, do you see H426,

7 these are a series of text messages? Do you have that?

8 A. Yes.

9 Q. You see that these are, there are a couple at the top, which

10 are messages, there is one from Mr. Depp to you at the top,

11 number 1, and there is one from you to Mr. Depp, at number 2;

12 do you see that?

13 A. Yes.

14 Q. Do not worry too much about the content. It is number 3, just

15 so you can see what it was.

16 A. Sorry, sir, number 2 or 3?

17 Q. Number 1 is Mr. Depp to you, the first three columns, there is

18 a number, number 1. Then there is the source, that is the

19 message. The next column is who the text was from. We have

20 seen these all, I appreciate you have not seen these,

21 Mr. Connolly, but just to give some context. The fourth

22 column is who the text was sent to.

23 A. Yes.

24 Q. In the third column you can see the first one is sent Mr. Depp

25 to you, you are one of the participants.

[Page 953]

1 CONNOLLY - SHERBORNE

2 A. Yes.

3 Q. The second one is from you back, I presume, we do not need to

4 worry about what is said, just showing you the pattern.

5 A. Yes.

6 Q. If you look at the third text, you can see that one is from

7 Mr. Depp to you. Do you see that?

8 A. Yes.

9 Q. And the fourth one is your response, I will come to what it

10 says in a second.

11 A. Yes.

12 Q. So, the third one, we have Mr. Depp texting you, saying:

13 "Please get her out of this room now. She struck me about ten

14 times, can't take any more".

15 A. Yes, I see that.

16 Q. In your experience, Mr. Connolly, of dealing with Ms. Heard

17 and Mr. Depp over a number of years, was this a one-off type

18 of text or conversation with Mr. Depp?

19 A. No.

20 Q. Then, we can see you respond saying: "Amber has gone through

21 no problems", I do not need to ask you anything more. Can

22 I ask you this, then. Mr. Connolly, you can put it away,

23 thank you. Mr. Connolly, did you ever witness Mr. Depp

24 physically attack or hit Ms. Heard at any time?

25 A. No. I would not tolerate any man striking a woman.

[Page 954]

1 CONNOLLY - SHERBORNE

2 Q. I did not quite -- you would not tolerate?

3 A. Any man striking a woman, no matter who he is. I just would

4 not tolerate that.

5 Q. Not even if he was your boss?

6 A. Not even if he was my boss. I do not care if he is the Pope.

7 Q. You do not care if he is the Pope?

8 A. No.

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

10 MR. SHERBORNE: Not even if your livelihood depended on it?

11 THE WITNESS: I do not depend on -- I work for Johnny. It was

12 only three days ago I got offered a job in Peru. I do not

13 depend on Johnny for my income, you know.

14 Q. Finally this, Ms. Wass put it to you, albeit slightly

15 tentatively, that you had been pressured to lie and to come on

16 Johnny's side, whereas you used to be fair; true or not true?

17 A. Absolutely untrue.

18 MR. SHERBORNE: Thank you, Mr. Connolly. If you wait there, his

19 Lordship may have some questions for you.

20 MR. JUSTICE NICOL: I do not have any further questions for you,

21 Mr. Connolly. Thank you for coming to give your evidence.

22 THE WITNESS: Thank you, sir.

23 MR. JUSTICE NICOL: As far as the court is concerned, you are free

24 to go.

25 THE WITNESS: Thank you, sir.

[Page 955]

1 CONNOLLY - SHERBORNE
 2 (The witness withdrew)
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[Page 957]

1 ROBERTS
 2 MS. TARA ROBERTS, CALLED
 3 (via video link)
 4 MR. JUSTICE NICOL: Yes. Ms. Roberts, can you hear me?
 5 THE WITNESS: Yes, I can.
 6 MR. JUSTICE NICOL: First of all, thank you for coming to give
 7 evidence at this trial. Thank you also for making yourself
 8 available at what I imagine is a few hours ahead of our time.
 9 THE WITNESS: No problem. Thank you.
 10 MR. JUSTICE NICOL: Now, the first thing that is going to happen
 11 is that you will either swear or affirm to tell the truth.
 12 You may do either; it is your choice. Which would you prefer?
 13 THE WITNESS: Okay, I have a bible, so I will swear to tell the
 14 truth.
 15 MR. JUSTICE NICOL: Sorry, I did not catch your answer. Would you
 16 prefer to swear or would you prefer to affirm?
 17 THE WITNESS: I will swear.
 18 MR. JUSTICE NICOL: All right. Then, is there a bible in front of
 19 you, or some other holy book which you would prefer?
 20 THE WITNESS: I have a bible in front of me.
 21 MR. JUSTICE NICOL: If you could take the bible in your hand
 22 please, and then listen to what the usher in London is going
 23 to ask you to repeat.
 24
 25

[Page 956]

1
 2 MR. SHERBORNE: My Lord, the next witness is Tara Roberts, and she
 3 is a video link witness. I do not know whether your Lordship
 4 would adopt the usual procedure of rising for five minutes.
 5 MR. JUSTICE NICOL: I will, and she is in the Bahamas, I think.
 6 MR. SHERBORNE: She is, my Lord, yes.
 7 MR. JUSTICE NICOL: Right. Yes, I will rise while you make sure
 8 the link is working satisfactorily.
 9 (A short break)
 10 MR. SHERBORNE: My Lord, can I call our next witness, Tara
 11 Roberts.
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[Page 958]

1 ROBERTS
 2 MS. TARA ROBERTS, SWORN
 3 EXAMINED BY MR. SHERBORNE
 4 MR. JUSTICE NICOL: Thank you, Ms. Roberts, you can put the bible
 5 down now. You are now going to be asked questions first by
 6 Mr. Sherborne, who is representing Mr. Depp.
 7 THE WITNESS: Okay.
 8 MR. SHERBORNE: Good morning, Ms. Roberts, good very early
 9 morning, Ms. Roberts.
 10 A. Good morning.
 11 Q. Before I ask you anything, can I just explain. There is, as
 12 I am picking up, a quite a lengthy time delay between what
 13 I am saying and when you are hearing it; is that correct?
 14 A. Yes. I can hear you, yes.
 15 Q. Thank you, because you have just demonstrated quite how long
 16 the time delay is between me saying something and you
 17 answering. So, as you will appreciate, it is very important,
 18 then, that both myself and Ms. Wass, who is going to ask you
 19 questions in a minute, on behalf of News Group, and you, when
 20 you answer those questions, that we do not talk over each
 21 other, which is easy to say, but much more difficult to do.
 22 Do you understand?
 23 A. Yes, I do.
 24 Q. Thank you. Also, the volume is not very high. I do not know
 25 whether the usher -- I think the usher is going to raise the

[Page 959]

1 ROBERTS - SHERBORNE
 2 volume very kindly for us. Can we ask for a bit of a sound
 3 check. Can you give your full name to the court, Ms. Roberts?
 4 A. Tara Lee Roberts.
 5 Q. Thank you. So, Ms. Roberts, also, if at any stage you do not
 6 hear what either I am saying or Ms. Wass is saying or what his
 7 Lordship is saying, please do say. As I understand it, it is
 8 these devices that we have in front of us that are the
 9 microphones you are picking up. It is very tempting as
 10 counsel to move around as one needs to go and get a file or
 11 just generally, and that means sometimes you may not hear what
 12 we are saying, so, if you do not, if you do not catch the end
 13 of a question, please do say something.
 14 A. Okay.
 15 Q. I think that is probably enough. Can I ask you, then, to
 16 start by identifying your witness statement. You should,
 17 I think, have a file -- you have an electronic bundle, I am
 18 told. There should be a file on that electronic bundle marked
 19 number 2. Do you have that?
 20 A. Yes.
 21 Q. There should be a series of electronic sub-files or tabs and
 22 there should be one which is numbered 59B. Have you got that?
 23 A. I have my printed witness statement, I printed it out.
 24 Q. Right. Maybe use that, then, for the moment. Does the front
 25 page of your witness statement say "Witness statement of Tara

[Page 960]

1 ROBERTS - SHERBORNE
 2 Roberts"?
 3 A. Yes, it does.
 4 Q. At the top, in quite small writing, top right-hand side, does
 5 it have a date 11th May 2020?
 6 A. Yes, it does.
 7 Q. Okay. I am going to take you to the back of that statement,
 8 and there should be a signature, we see, at the back of that
 9 statement. Do you have it?
 10 A. Yes, I do.
 11 Q. Can you confirm to the court, is that your signature?
 12 A. Yes, it is.
 13 Q. Then, finally, Ms. Roberts, can you confirm that the contents
 14 of your witness statement are true?
 15 A. Yes, they are.
 16 MR. SHERBORNE: If you wait there, Ms. Wass, on behalf of the
 17 defendants, will ask you some questions. Thank you very much.
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[Page 961]

1 ROBERTS
 2 CROSS-EXAMINED BY MS. WASS
 3 Q. Ms. Roberts, you are the estates manager on Mr. Depp's private
 4 island; is that correct?
 5 A. Yes, it is.
 6 Q. Do you live on the island?
 7 A. Yes, I do.
 8 Q. Does your family live on the island?
 9 A. No, they do not.
 10 Q. Where do your children live?
 11 A. Arizona.
 12 Q. You do not live with your children; is that correct?
 13 A. No.
 14 Q. I mean, are they adults?
 15 A. Yes.
 16 Q. So, you live on the island alone or with other people?
 17 A. There are three employees; there is four in total.
 18 Q. Four of you in total. Do you live there most of the year?
 19 A. Yes.
 20 Q. And do you consider the island your home?
 21 A. No.
 22 Q. How long have you lived on the island?
 23 A. I have been here for 11 years.
 24 Q. You have lived on the island for 11 years and most of the year
 25 you spend on the island, but you do not consider it your home?

[Page 962]

1 ROBERTS - WASS
 2 A. No, I have a home.
 3 Q. You have another home. I understand.
 4 A. In Nassau.
 5 Q. But you are totally dependent on Mr. Depp for your livelihood,
 6 are you not?
 7 A. No.
 8 Q. He pays you?
 9 A. Yes.
 10 Q. He gives you a job?
 11 A. Yes.
 12 Q. He gives you accommodation?
 13 A. Yes.
 14 Q. And that is your livelihood, is it not?
 15 A. Yes; but I have other sources of income.
 16 Q. What sources of income? I mean, the other sources of income
 17 -- I do not want to pry into your financial life -- but do
 18 your other sources of income enable you to never earn a living
 19 again?
 20 A. I am not dependent on the job here for a source of income. We
 21 have a family business in the Bahamas.
 22 Q. But the position is you have worked in Mr. Depp's island for
 23 11 years, where you live, and you are paid by him and
 24 accommodated by him; yes?
 25 A. Correct.

[Page 963]

1 ROBERTS - WASS
 2 Q. Would you be sad if you lost your job?
 3 A. (Pause) I have not thought of it. I would miss the area and
 4 I would miss the friends I have made. So, I would be sad if
 5 I lost it, but I would move on to another job if, as I have
 6 done in the past.
 7 Q. Now, you have made a statement dated May 2020. In this, you
 8 say: "I never saw Johnny, who is an unusually kind man, be
 9 violent or aggressive with Amber or anyone else".
 10 A. Can you read it one more time, please.
 11 Q. Of course. This is from paragraph 7 of your statement, if you
 12 have it in front of you, it might be easier to follow it.
 13 A. Yes. I can hear you now.
 14 Q. You said, "I never saw Johnny, who is an unusually kind man,
 15 be violent or aggressive with Amber or anyone else"?
 16 A. Right. Correct. I see it.
 17 Q. I am going to ask you to look at a video clip, and I wonder if
 18 the court camera can be put on so that the witness can see it?
 19 (Video clip shown to the court)
 20 Q. Ms. Roberts, were you able to see that clip all right?
 21 A. I was able to see it. It was not clear, but I was able to see
 22 it and hear it.
 23 Q. You are able to confirm, are you, that that is Mr. Depp in the
 24 clip?
 25 A. I could see him, yes.

[Page 964]

1 ROBERTS - WASS
 2 Q. And Ms. Heard in the clip?
 3 A. Yes.
 4 Q. And did you see, and can you confirm, that Mr. Depp was
 5 kicking doors, objects, furniture?
 6 A. It was hard to see on the clip. I heard more than I saw. I
 7 saw the door, the cupboards.
 8 Q. You saw that he kicked the cupboard?
 9 A. I saw the piece where he slammed the cupboard.
 10 Q. Did you see the bit at the beginning where he uses his foot to
 11 kick the cupboard?
 12 A. No, I did not see that part.
 13 Q. Would you like to see it again?
 14 MR. SHERBORNE: My Lord, with respect, this is nothing that this
 15 witness can speak about. It is just a vehicle to show this
 16 witness something and get her to comment on what she sees. It
 17 has nothing to do with her. It did not even take place in the
 18 Bahamas.
 19 MR. JUSTICE NICOL: Ms. Wass?
 20 MS. WASS: My Lord, this witness is giving character evidence
 21 about Mr. Depp and I am entitled to ask her to consider
 22 evidence which shows Mr. Depp's character in a light which is
 23 different from the way she had portrayed him.
 24 MR. JUSTICE NICOL: Perhaps we can get to that point, that you ask
 25 her whether her view of Mr. Depp's character is different

[Page 965]

1 ROBERTS - WASS
 2 because of what she sees on this clip.
 3 MS. WASS: I wanted to establish what she was able to see because
 4 there seems to be a difficulty. She appears not to have seen
 5 passages at the beginning of the clip, but I am happy to deal
 6 with it more swiftly if my Lord thinks that would be best.
 7 MR. JUSTICE NICOL: I think it would.
 8 MS. WASS: All right. Ms. Roberts, can you hear me?
 9 A. Yes, I can.
 10 Q. Have you ever seen Mr. Depp behave in a way that he was
 11 behaving on that clip?
 12 A. No.
 13 Q. Would you agree that that clip shows a different side of his
 14 character from the one that you have referred to in your
 15 statement?
 16 A. I have not seen him like that.
 17 Q. Would you agree it shows a different side of his character
 18 from the one that you speak of in your statement?
 19 A. Yes.
 20 Q. Thank you. You have given evidence in your statement about
 21 two incidents. The first was 14th August 2014 when Mr. Depp
 22 was detoxifying on the island; is that right?
 23 A. Correct.
 24 Q. And your evidence was that there was no damage to any property
 25 that you saw during the time of his detoxification?

[Page 966]

1 ROBERTS - WASS
 2 A. Correct.
 3 Q. Now, I am going to ask you about some medical evidence in this
 4 case. I am going to read it to you rather than ask you to get
 5 it in electronic form, but if you prefer to get it in
 6 electronic form, we can try and arrange that. Does that suit
 7 you, that suggestion?
 8 A. For you to read it to me?
 9 Q. Yes.
 10 A. Okay, I will listen to it.
 11 Q. For my Lord's note, it is tab 137 of file 4, page F813.
 12 MR. JUSTICE NICOL: Just a minute. (Pause)
 13 MS. WASS: Ms. Roberts, people are just getting up the documents,
 14 and that is why there is a little delay.
 15 A. Okay. Thank you.
 16 MR. JUSTICE NICOL: Just a moment. Let me get the page. (Pause)
 17 Yes.
 18 MS. WASS: Did you meet Dr. Kipper, who was the doctor who was
 19 involved in Mr. Depp's detoxification?
 20 A. Yes.
 21 Q. And did you meet Nurse Debbie Lloyd, who was there?
 22 A. Yes.
 23 Q. And it may be that they did not discuss Mr. Depp's progress
 24 with you because it was sensitive and private and involved his
 25 medical condition. So, did they discuss anything with you

[Page 967]

1 ROBERTS - WASS
 2 about his progress?
 3 A. Not in detail.
 4 Q. Not in detail. Did they say anything about any difficulties
 5 he had with the detoxification process?
 6 A. No. No, they did not say much difficulty with it. It was --
 7 no, they did not have a discussion with me about the medical
 8 part of it.
 9 Q. Ms. Roberts, it may well be that the last thing medics wanted
 10 to do was to reveal any sensitive information, even to
 11 somebody who was a close employee. The passage I want to read
 12 to you relates to a different date, not the date on the
 13 island, but just to give you an indication of difficulties
 14 that Mr. Depp did have around this period. This was the 22nd
 15 September, so the following month after the detoxification.
 16 The medical notes read -- and I am reading from the top hole
 17 punch, my Lord.
 18 MR. JUSTICE NICOL: So, this is 22nd September.
 19 MS. WASS: 22nd September, page 813: "Upon arriving at the home,
 20 patient was sitting in kitchen with scraped and bloody
 21 knuckles on right hand. Patient stated he had punched white
 22 board in kitchen after a fight." Did you hear that all right;
 23 Ms. Roberts?
 24 A. Yes, I did.
 25 Q. It would appear that Dr. Kipper saw a different aspect of

[Page 968]

1 ROBERTS - WASS
 2 Mr. Depp than you did; would you agree?
 3 A. Yes.
 4 Q. Can I then turn to the second aspect of your evidence, which
 5 is Christmas 2015. Now, were you aware that Mr. Depp and
 6 Ms. Heard were at a part of their relationship where things
 7 were very difficult indeed?
 8 A. No.
 9 Q. And there is absolutely no reason why they would involve you
 10 in their private personal difficulties, is there?
 11 A. No.
 12 Q. But on the occasion that you referred to, you arrived really
 13 when an argument was in full flow. You did not see the
 14 beginning of that argument; is that right?
 15 A. Yes.
 16 Q. You agree with what I said, you did not see the beginning of
 17 the argument?
 18 A. I agree with you.
 19 Q. That is right. As far as you were concerned, you have
 20 suggested that it was Ms. Heard who was the more violent; is
 21 that right?
 22 A. Correct.
 23 Q. You said that Mr. Depp had a gash on his forehead because she
 24 threw something at him. I am looking at paragraph 15 of your
 25 statement.

[Page 969]

1 ROBERTS - WASS
 2 A. Correct.
 3 Q. I mean ----
 4 A. Yes.
 5 Q. ---- what sort of gash are we talking about?
 6 A. What you would get if it had a graze and a bruise on the
 7 bridge of his nose. (Unclear due to audio distortion)
 8 Q. Forgive me, I did not hear that. It is not your fault; it is
 9 because of the technology. I heard the word "bruise" and
 10 "nose".
 11 A. He had a -- sorry. On the bridge of his nose, there was a
 12 gash, a cut.
 13 Q. So he had a cut on the bridge of his nose. Was it a wound? I
 14 mean, was it bleeding?
 15 A. It was not bleeding. It had broken the skin.
 16 Q. Right, and was any suggestion ever made by Mr. Depp that this
 17 injury should be recorded by way of a photograph?
 18 A. Oh, no. No, I did not photograph it.
 19 Q. Not just that you did not photograph it, but Mr. Depp never
 20 suggested that you should photograph it?
 21 A. No.
 22 Q. And your evidence at the same time was that Ms. Heard, on that
 23 holiday, was unmarked; is that right? She was free from
 24 injury; is that right?
 25 A. Yes.

[Page 970]

1 ROBERTS - WASS
 2 Q. I am going to suggest that she had the remains of a bruise or
 3 a mark to her right cheek. What do you say about that?
 4 A. I did not see it. It was not visible to me.
 5 Q. I think the fight that you are talking about took place on
 6 29th December; is that right?
 7 A. Yes.
 8 Q. I put something incorrectly. I want to correct what I have
 9 said. It was not a bruise to her right cheek. She had signs
 10 of a black eye, bruising under both eyes.
 11 A. It was not visible to me.
 12 Q. Have you got access to the photographs? Is it possible to
 13 show the photographs on the screen from here?
 14 MR. JUSTICE NICOL: Which photograph are we talking about?
 15 MS. WASS: I am going to go to file 6, tab 148. A photograph is
 16 going to be held up to you. It is 148, F894.132. Can you
 17 hold it a little closer, right up to the camera? Can you see
 18 that all right, Ms. Roberts? It may be very difficult for
 19 you.
 20 A. I can see the picture.
 21 Q. That is Ms. Heard, is it not?
 22 A. Yes, it is.
 23 Q. And can you see that she has bruising under both eyes? Could
 24 we hold it up a little closer?
 25 A. In the picture, I see it.

[Page 971]

1 ROBERTS - WASS
 2 Q. You see the bruising in the picture under both eyes; yes?
 3 A. Yes, I do. Yes.
 4 Q. Was that what she looked like on the island that Christmas
 5 holiday?
 6 A. No.
 7 Q. You are sure about that?
 8 A. I did not see that.
 9 Q. You did not see that. All right, thank you very much indeed.
 10 Can I have my photograph back? That is all I ask you,
 11 Ms. Roberts. Thank you very much indeed.
 12 A. You are welcome.
 13 MR. JUSTICE NICOL: Yes. Mr. Sherborne.
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[Page 972]

1 ROBERTS
 2 RE-EXAMINED BY MR. SHERBORNE
 3 MR. SHERBORNE: Ms. Roberts, just give me one second to sort out
 4 my bundles. I have a feeling that if I am going to ask you
 5 questions, I need to move this with me. Does that get better
 6 as I move?
 7 A. I can hear you, yes.
 8 Q. Let me stick that there. You were shown a video, a short
 9 clip. To start with, have you ever seen that clip before?
 10 A. No.
 11 Q. Do you know where it was taken?
 12 A. No.
 13 Q. Do you know when it was taken?
 14 A. No.
 15 Q. I think you said that you heard or saw Mr. Depp kick a
 16 cupboard or slam a cupboard door. Did you see or hear
 17 Mr. Depp on that video be at all violent or aggressive to
 18 Ms. Heard?
 19 A. No.
 20 Q. I am just going to read back to you the part of your witness
 21 statement that Ms. Wass was suggesting was untrue. Can you
 22 look at paragraph 7 of your witness statement?
 23 MR. JUSTICE NICOL: Just a minute. (Pause)
 24 THE WITNESS: Yes.
 25 MR. JUSTICE NICOL: Just a moment, please. (Pause) Remind me of

[Page 973]

1 ROBERTS - SHERBORNE
 2 the tab, please.
 3 MR. SHERBORNE: It is tab 59B.
 4 MR. JUSTICE NICOL: Which paragraph?
 5 MR. SHERBORNE: It is paragraph 7 and this is what you said:
 6 "I never saw Johnny, who is an unusually kind man, be violent
 7 or aggressive with Amber or anyone else." That is what you
 8 said. You never saw Johnny be violent or aggressive with
 9 Amber or anyone else.
 10 A. Correct.
 11 Q. I am going to ask you this, Ms. Roberts. Having seen that
 12 clip that Ms. Heard secretly took of Mr. Depp, is there
 13 anything in that clip that makes you want to change your
 14 evidence that you never saw Johnny be violent or aggressive
 15 with Amber or anyone else?
 16 A. I never saw it on the island, him being aggressive to Amber on
 17 the island.
 18 Q. Did you ever see Mr. Depp hit Ms. Heard at any point?
 19 A. No.
 20 Q. Now, you have given evidence throughout your witness statement
 21 of how you saw Ms. Heard physically assault Mr. Depp in a
 22 number of ways; yes?
 23 A. Correct.
 24 Q. And you were not challenged on that, but you were asked about
 25 some bruise or bruises. Do you remember the photo you were

[Page 974]

1 ROBERTS - SHERBORNE
 2 shown?
 3 A. Yes.
 4 Q. Can I ask you to look at paragraph 18 of your witness
 5 statement?
 6 A. Yes.
 7 Q. You explain that Ms. Heard was not wearing makeup on the
 8 island?
 9 A. Correct.
 10 Q. Did you ever see that bruising on her when she was on the
 11 island?
 12 A. No.
 13 Q. If she had those bruises that you saw on the photo when she
 14 was on the island, do you think you would not have seen them?
 15 A. If she had them, I would have seen them.
 16 Q. Ms. Roberts, it was suggested to you that you depended on
 17 Mr. Depp for your livelihood and you said, no, you were not
 18 dependent on him. When you were pressed by Ms. Wass, who
 19 said, "Well, he gave you a job, and a place to live", you
 20 said, "I have an alternative source of income." You were
 21 asked and you said, "There is a family business in the
 22 Bahamas." What is the family business that you have in the
 23 Bahamas?
 24 A. A law firm business and a car dealership.
 25 Q. So you have a law firm in the Bahamas?

[Page 975]

1 ROBERTS - SHERBORNE

2 MR. JUSTICE NICOL: I did not catch the second part of it.

3 MR. SHERBORNE: I think a car dealership as well. I think that is

4 what you said.

5 A. Correct. Correct.

6 MR. SHERBORNE: Would you just permit me a moment. (Pause) The

7 final question is this. Ms. Wass is suggesting that you are

8 not telling the truth because you are scared of losing a job

9 that you love, a livelihood you need, and your home on the

10 island. Are you lying because you are worried about those

11 things, Ms. Roberts?

12 A. No, I am not lying. I am not lying.

13 MR. SHERBORNE: Ms. Roberts, thank you very much. I have no

14 further questions.

15 MR. JUSTICE NICOL: I do not have any questions. Ms. Roberts,

16 that concludes your evidence. Thank you again for taking the

17 time to give your evidence to the court. Thank you again for

18 accommodating us at this hour of the morning for you. We will

19 now turn the video off.

20 THE WITNESS: Thank you.

21 (The witness withdrew)

22

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[Page 976]

1 DISCUSSION

2 MR. SHERBORNE: My Lord, unusually, that completes our evidence

3 short of a break. The next two witnesses are giving video

4 link evidence from Los Angeles, which starts at 2 p.m.

5 MR. JUSTICE NICOL: Well, Mr. Sherborne, my clerk, I think,

6 e-mailed you about a number of matters that were outstanding

7 and I got a response saying we could deal with those this

8 afternoon.

9 MR. SHERBORNE: My Lord, yes.

10 MR. JUSTICE NICOL: If there is time available this morning, would

11 it be convenient to at least start addressing some of those

12 now?

13 MR. SHERBORNE: My Lord, I think we can probably deal with one or

14 two of those, if that would assist.

15 MR. JUSTICE NICOL: Yes, that is a good idea.

16 MR. SHERBORNE: As I understand it, there are four matters on the

17 potential agenda.

18 MR. JUSTICE NICOL: Just a moment. Let me turn up my printout of

19 the notes. (Pause) Yes, one of those was whether Mr. White,

20 who gave evidence yesterday, should be asked to, or take up

21 his offer of making further enquiries.

22 MR. SHERBORNE: My Lord, yes. I might not have put it quite that

23 way. My Lord, there are four matters, as I understand it,

24 that your Lordship raised. If I can put it this way, the good

25 news, so to speak, is that I thought we were going to be in a

[Page 977]

1 DISCUSSION

2 position -- well, the good news is that I think we can deal

3 with what your Lordship has lettered (C), which is

4 correspondence from Mr. Stephens of Howard Kennedy, on behalf

5 on CNN. I think I am in a position to deal with that although

6 that is really a matter for your Lordship.

7 The application on behalf of the Press Association

8 I thought I might be in a position to deal with, but I did not

9 understand there was actually a formal application and I have

10 not seen that, so it might be sensible for me to look at that

11 before I address your Lordship. However, it may be that we do

12 not need to take up too much time with that.

13 Then, as far as the others are concerned, the way

14 I would propose your Lordship deals with this, if you are

15 happy to do so, is that the application for permission in

16 relation to the two additional witness statements is still

17 dealt with at the end of the day, for reasons -- I am told

18 there is no objection.

19 MS. WASS: There is no objection so that can be ticked off the

20 list straightaway.

21 MR. SHERBORNE: That leaves Mr. White. Can I just propose it is

22 dealt with in this way. I hope this is a pragmatic way of

23 dealing with it. It would be useful to understand why it is

24 that -- your Lordship will remember how it arose. I think, to

25 be fair to Mr. White, what happened is that Ms. Wass asked him

[Page 978]

1 DISCUSSION

2 the question and he said he did not know the answer off the

3 top of his head so he would have to think about it. Then

4 Ms. Wass asked him, "Could you go away and think about it?"

5 In the nicest possible way -- I am not criticising Ms. Wass at

6 all -- it is not difficult to understand why a witness, when

7 asked a question like that in court, is going to say, "I can

8 go and do that." The real question is, what is the relevance

9 of the evidence he is being asked to provide? That is a

10 question to which, at the moment, there is no answer.

11 What would be useful to know is what issue it goes to in

12 the case, preferably a pleaded one, that might be a helpful

13 start, and then we can have submissions, if necessary. It may

14 not be necessary, but we can have submissions as to whether

15 that should be ordered or not. I put it that way, because at

16 the moment, as I say, I hope your Lordship appreciates the

17 candour, but we do not understand what relevance this could

18 have.

19 MR. JUSTICE NICOL: All right. Would it be helpful, Ms. Wass, are

20 you in a position now to explain to me the relevance of the

21 further matters?

22 MS. WASS: Yes, and may I say I could have explained it to

23 Mr. Sherborne, if he had asked me.

24 MR. JUSTICE NICOL: Well.

25 MS. WASS: Rather than dealing with it through the court.

[Page 979]

1 DISCUSSION

2 MR. JUSTICE NICOL: You can do it with me now.

3 MS. WASS: My Lord, one of the criticisms that has been made of

4 Ms. Heard, both in the press following the domestic violence

5 restraining order and subsequently, is that she is a

6 gold-digger and, indeed, that appears to be the motivation

7 behind the claimant's suggestion that all of the evidence in

8 this case amounts to an elaborate hoax in order to trick,

9 somehow trick Mr. Depp.

10 The position is that Ms. Heard was given a settlement of

11 \$7 million, when the divorce came through on 15th August 2016.

12 The terms of that divorce were that they were payable in

13 tranches over a period of two years, ending in November 2018.

14 If the position is, as I am instructed would be the case, that

15 she was entitled to half the income accrued by Mr. Depp during

16 the course of their marriage.

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

18 MS. WASS: In the absence of a pre-nup or a post-nuptial

19 agreement, which is the case here, and we are all agreed on

20 that, and the settlement was considerably less than she was

21 technically entitled to, which we say is the position, it

22 considerably emasculates the claimant's case for motive for

23 the hoax and for the allegation that Ms. Heard is a

24 gold-digger.

25 MR. JUSTICE NICOL: That was why you wanted to get -- what was the

[Page 980]

1 DISCUSSION

2 further information that you were asking for?

3 MS. WASS: I was asking for effectively his accounts for the year

4 ending or covering the period of the marriage between

5 February 2015 and May 2016.

6 MR. JUSTICE NICOL: Yes.

7 MS. WASS: His income, which I am instructed, was quite

8 considerable during the period; which is why I put the figure

9 of 60 million to Mr. White.

10 MR. JUSTICE NICOL: Yes. Mr. Sherborne is asking about the

11 pleaded issue to which this goes.

12 MS. WASS: It goes to the entire case, because Mr. Depp's entire

13 defence is that Ms. Heard has perpetrated an elaborate hoax on

14 Mr. Depp, creating a dossier of false complaints, dating back

15 to 2013.

16 Now, if I have misunderstood it and this has nothing to

17 do with an attempt to get money from Mr. Depp, I can see that

18 that might not be relevant. But it appears from the way

19 Ms. Heard has been portrayed in the press, by those acting on

20 behalf of Mr. Depp, that she is described as somebody

21 motivated by money. It strikes at the heart of the claimant's

22 case.

23 MR. JUSTICE NICOL: Yes. Okay. Right.

24 MR. SHERBORNE: I can probably deal with it. My Lord, never

25 before have I heard someone say that something strikes at the

[Page 981]

1 DISCUSSION

2 heart of a case and it is not actually pleaded. Worse, not

3 only is this not pleaded, it is not even referred to in a

4 witness statement. Even worse than that, as a starting point

5 for effectively what turns out to be a disclosure application,

6 it was not even put to Mr. Depp. It is entirely misconceived,

7 because it is not suggested, whatever may be Ms. Heard's

8 concerns about the PR battle which she fights outside this

9 court, and we have seen a lot of that in the run-up to this

10 trial, whatever may be her concerns as to how she is

11 portrayed, that is not what Mr. Depp has said about the fact

12 that Ms. Heard put together this insurance dossier, as he

13 described it.

14 MR. JUSTICE NICOL: Just a moment. (Pause) Yes.

15 MR. SHERBORNE: Of photographs never shown to him at the time,

16 which Ms. Heard in evidence says she took in order to show him

17 what he had supposedly done, or documents written to herself,

18 but not shown. That was the insurance dossier. Your Lordship

19 heard the tape of their meeting. It is not suggested, it was

20 not suggested by Mr. Depp this was anything to do with being a

21 gold-digger. With the greatest respect, Ms. Heard's view or

22 sensitivity about PR outside of this case has nothing to do

23 with it. It would have nothing to do with it if she was a

24 party to this case, but I have to remind your Lordship she is

25 not a party; she is just a mere witness, as we have been told

[Page 982]

1 DISCUSSION

2 countless times as the answer to what we say are perfectly

3 reasonable and fair requests for there to be equality about

4 the documents that Mr. Depp has been ordered to provide,

5 whereas Ms. Heard has been allowed to cherry pick only the

6 ones she believes, albeit we say misconceived, she believes

7 help her.

8 The other point to make, if we really are going to get

9 into questions about how much Ms. Heard would have been

10 entitled to in the divorce, which were raised at a trial

11 within a trial, is, as I understand it, the court's decision,

12 or the court's decision would be based on how long they were

13 married for, which was a short marriage.

14 So, if your Lordship wants to litigate the divorce, how

15 much Ms. Heard would have received and so on, we are going to

16 have to adduce all sorts of new evidence. Again, I stress, in

17 relation to an issue that is not pleaded, not referred to in a

18 witness statement, and not even put. There is enough evidence

19 that we really do need to deal with, and we have a fairly

20 tight timetable, as your Lordship has rightly reminded us.

21 Therefore, in my submission, what has become very clear from

22 Ms. Wass being asked to articulate what the purpose of this

23 is, is that it does not serve any legitimate purpose, and

24 would lead to a disproportionate investigation into an issue

25 which is not part of the case, even. It is not even on the

[Page 983]	[Page 985]
<p>1 DISCUSSION</p> <p>2 periphery of the case, not even part of the case.</p> <p>3 MR. JUSTICE NICOL: Thank you.</p> <p>4 MS. WASS: Can I deal with that? Does my Lord have a copy of</p> <p>5 Mr. Depp's statement, the second witness statement, dated</p> <p>6 12th December 2019?</p> <p>7 MR. JUSTICE NICOL: Just a minute. (Pause)</p> <p>8 MS. WASS: File 2, tab 38.</p> <p>9 MR. JUSTICE NICOL: Yes.</p> <p>10 MS. WASS: Can my Lord go first of all to paragraph 14, at D25.</p> <p>11 It says, six lines from the bottom: "It was not until much</p> <p>12 later that I understood that she had an agenda, namely, to get</p> <p>13 married to me in order to progress her own career and/or to</p> <p>14 benefit financially, and she knew how to bring it about."</p> <p>15 That is what he says in his statement. At paragraph 16 ----</p> <p>16 MR. JUSTICE NICOL: Just a minute. Just a minute much (Pause)</p> <p>17 Paragraph 16.</p> <p>18 MS. WASS: Paragraph 16, four lines down, to the right, there is</p> <p>19 the last sentence which says: "I am now convinced that she</p> <p>20 came into my life to take from me everything worth taking and</p> <p>21 then destroy what remained of it." I remind my Lord as well</p> <p>22 of what Mr. Depp said to Mr. Carino in the texts that have</p> <p>23 been read out in evidence, page 194 of the text schedule.</p> <p>24 MR. JUSTICE NICOL: Just a moment. This is volume 6.</p> <p>25 MS. WASS: Volume 6, 119.</p>	<p>1 DISCUSSION</p> <p>2 I am asking from Mr. White to confirm the accounts of Mr. Depp</p> <p>3 for the year, the relevant year, the year of the marriage,</p> <p>4 which he is in a position to be able to do.</p> <p>5 MR. JUSTICE NICOL: I am not sure where that goes, unless I do</p> <p>6 have evidence on what the divorce laws of California would be.</p> <p>7 MS. WASS: Well, Mr. White ----</p> <p>8 MR. JUSTICE NICOL: Why does the information about his accounts</p> <p>9 help absent that information?</p> <p>10 MS. WASS: Because Mr. White has already confirmed in evidence,</p> <p>11 because he was involved in negotiating the settlement, not</p> <p>12 necessarily the negotiation, but he involved himself in the</p> <p>13 financial side of it, obviously.</p> <p>14 MR. JUSTICE NICOL: Well, I have said that I can see that he</p> <p>15 could, at least in theory, give evidence about what the size</p> <p>16 of the settlement was. But part of what you were asking him</p> <p>17 to give evidence about was the income that Mr. Depp had earned</p> <p>18 over the earlier period.</p> <p>19 MS. WASS: But Mr. White has already confirmed that under</p> <p>20 California law a spouse was entitled ----</p> <p>21 MR. JUSTICE NICOL: Mr. White is not a lawyer, he is not able to</p> <p>22 give that expert evidence.</p> <p>23 MS. WASS: Well, in my submission, he was involved in this divorce</p> <p>24 negotiation.</p> <p>25 MR. JUSTICE NICOL: Well, it may be that he was involved, but it</p>
[Page 984]	[Page 986]
<p>1 DISCUSSION</p> <p>2 MR. JUSTICE NICOL: Just a minute. (Pause) Which page in the text</p> <p>3 schedule?</p> <p>4 MS. WASS: 194.</p> <p>5 MR. JUSTICE NICOL: Sorry?</p> <p>6 MS. WASS: 194. It is the top text. (Pause) If I can start three</p> <p>7 lines down, in the middle: "I have no mercy, no fear, not an</p> <p>8 ounce of emotion on what I once thought was love for this</p> <p>9 gold-digging, low level" -- the adjectives continue for some</p> <p>10 time, but gold-digging is top of the list. That is not the</p> <p>11 only reference we can see at the bottom of the page another:</p> <p>12 "It's finally over. I never have to see that scum bag,</p> <p>13 gold-digging cunt ever again."</p> <p>14 MR. JUSTICE NICOL: Ms. Wass, while I can see that Mr. White might</p> <p>15 be able to speak to the amount of the settlement and he added</p> <p>16 various refinements to the 7 million, as I have understood it,</p> <p>17 Mr. White is an accountant.</p> <p>18 MS. WASS: Yes.</p> <p>19 MR. JUSTICE NICOL: He is not giving evidence before me as an</p> <p>20 expert on California law.</p> <p>21 MS. WASS: No. No.</p> <p>22 MR. JUSTICE NICOL: Well, it is not really for him to express an</p> <p>23 opinion, is it, on what the provisions of California divorce</p> <p>24 law would be?</p> <p>25 MS. WASS: I am asking from him, well, two matters. First of all,</p>	<p>1 DISCUSSION</p> <p>2 is not -- I would need expert evidence from somebody who is</p> <p>3 able to give expert evidence as to the terms of California</p> <p>4 divorce law, would I not?</p> <p>5 MS. WASS: My Lord, if that were obtained, an American lawyer, to</p> <p>6 say ----</p> <p>7 MR. JUSTICE NICOL: Yes, but it is not obtained, and it is too</p> <p>8 late now to try and adduce expert evidence about California</p> <p>9 divorce law.</p> <p>10 MS. WASS: My Lord, the position is that there will be, or</p> <p>11 I anticipate that there will be evidence from witnesses, who</p> <p>12 are already in the bundle, when asked about ----</p> <p>13 MR. JUSTICE NICOL: Just a minute. Ms. Wass, the court's</p> <p>14 permission is needed before expert evidence is adduced.</p> <p>15 MS. WASS: Of course.</p> <p>16 MR. JUSTICE NICOL: Are you saying that the court's permission has</p> <p>17 been given for expert evidence on California divorce law?</p> <p>18 MS. WASS: No, it has not. No, it has not. But the factual</p> <p>19 position will come up, whether Ms. Heard is a gold-digger or</p> <p>20 not, because that is so central to the claim in this case, and</p> <p>21 if the evidence is that she could have got more than she did</p> <p>22 settle for, then the court will have no further assistance</p> <p>23 than that.</p> <p>24 MR. JUSTICE NICOL: Well, I am sorry, it seems to me that I would</p> <p>25 need expert evidence as to what California law would entitle</p>

[22] (Pages 983 to 986)

[Page 987]

1 DISCUSSION
 2 her to, and that is not before the court. What Mr. White may
 3 be able to say about Mr. Depp's earnings are nothing to the
 4 point, absent that evidence.
 5 MS. WASS: I agree. I agree.
 6 MR. JUSTICE NICOL: And that evidence is not going to be before
 7 the court.
 8 MS. WASS: My Lord, there is no expert evidence and there is no
 9 application for expert evidence. But if civilian evidence is
 10 to be challenged as to whether a particular party may have
 11 received a greater settlement -- (Pause) -- then that may make
 12 the matter relevant.
 13 MR. JUSTICE NICOL: Well, I am against you, I am afraid.
 14 MS. WASS: All right, I understand that.
 15 MR. JUSTICE NICOL: It seems to me that there is a separate matter
 16 over the size of the settlement that she did in fact receive.
 17 MS. WASS: Yes.
 18 MR. JUSTICE NICOL: Is there anything more that you want to say on
 19 that aspect?
 20 MS. WASS: Not on the size of the settlement.
 21 MR. JUSTICE NICOL: Okay. Now, you have elaborated, I am going to
 22 give Mr. Sherborne an opportunity before I make a ruling on
 23 that aspect. I am against you on the income part of it, but
 24 I am going to allow Mr. Sherborne to say anything that he
 25 wants about the size of the financial settlement.

[Page 988]

1 DISCUSSION
 2 MS. WASS: Thank you.
 3 MR. JUSTICE NICOL: Mr. Sherborne, you have probably gathered that
 4 I am not inclined to ask Mr. White to give us further
 5 information about the income that Mr. Depp earned during the
 6 course of their marriage or their relationship, because it
 7 seems to me that absent information about California divorce
 8 law, that part of what Ms. Wass sought goes nowhere. But
 9 I need to hear anything further that you want to say about the
 10 details or the size of the settlement.
 11 MR. SHERBORNE: My Lord, I understand. Can I say this, this is
 12 the problem -- I am going to keep this very short -- but this
 13 is the problem with using witnesses, as Ms. Wass has sought to
 14 do, as vehicles for submissions. By trying to get them to
 15 accept propositions and then, if they do, using that as a
 16 springboard for a submission. We have seen that time and time
 17 again and, in my submission, this is the problem, the sort of
 18 problem one faces down the line when Ms. Wass seeks to build
 19 on that to make a submission.
 20 The second point I need to make is, Ms. Wass took you to
 21 two passages in Mr. Depp's witness statement, but they are
 22 nothing to her point. Her point was that somehow Mr. Depp's
 23 belief that Ms. Heard was putting together an insurance
 24 dossier, this is how he pieced it together after the event, as
 25 he said. Your Lordship does not need to worry about this,

[Page 989]

1 DISCUSSION
 2 because you only need to decide, did Mr. Depp hit Ms. Heard or
 3 not? How Mr. Depp pieces that together after the event in his
 4 mind is another matter. Even if that was an issue for
 5 your Lordship, he does not suggest that this was all because
 6 she wanted to make money off him. The hoax is not connected
 7 to the fact that he says, on two occasions, she came into the
 8 relationship wanting to further her career. He talked about
 9 her being ambitious, you heard time and time again.
 10 What Ms. Wass is trying to do, in front of
 11 your Lordship, is to join the two together, again, showing a
 12 text written after the event to Mr. Carino, when he describes
 13 her as gold-digging does not suggest that is anything to do
 14 with the hoax. The bigger problem for Ms. Wass is that she
 15 did not even put this to Mr. Depp when he mentioned the
 16 insurance dossier. Again, what Ms. Wass did, as you recall,
 17 is say, "Here is a photo of Ms. Heard, if you are saying it
 18 did not happen, can you please explain to the court what
 19 reason there could be for her to make it up." That is how it
 20 went. This is what I mean by using witnesses as vehicles for
 21 comment and then building on top of them.
 22 In my submission, this simply cannot stand up as a case
 23 for the defendants, because it is not pleaded. It is no good
 24 trying to get round the fact things are not pleaded by saying
 25 it goes to the heart of their case or somehow this is the big

[Page 990]

1 DISCUSSION
 2 picture. It is not pleaded. It has not been put to him. His
 3 witness statement, when it talks about a hoax later on, does
 4 not refer to gold-digging at all.
 5 As far as the settlement figure is concerned, as
 6 I understand it, that settlement was negotiated
 7 confidentially. So, I would to ask a few questions to find
 8 out what the position is; but both sides agreed
 9 confidentiality. I do not know whether, what Ms. Wass's
 10 instructions are now. She is not obviously acting for
 11 Ms. Heard. I understand the confusion sometimes, but she is
 12 not acting for her. So, I do not know what the position is as
 13 regards the parties, and I do not think it would be right for
 14 me to deal with it now. I can investigate that, but that is
 15 what I am told is the position.
 16 MR. JUSTICE NICOL: Anything else you want to say?
 17 MR. SHERBORNE: My Lord, no.
 18 MR. JUSTICE NICOL: Right. It has been useful to have the
 19 discussion now, but we have taken it slightly earlier than was
 20 anticipated. I will therefore give you the opportunity that
 21 you are asking about to take further instructions on whether
 22 this is confidential, and I will hear both of you as to
 23 whether that makes a difference. But, subject to that, I am
 24 inclined to say that Mr. White should be asked to give
 25 whatever information he is able to give about the settlement

[Page 991]	[Page 993]
<p>1 DISCUSSION</p> <p>2 that was reached with Ms. Heard as part of the divorce</p> <p>3 agreement.</p> <p>4 MR. SHERBORNE: Thank you, my Lord.</p> <p>5 MR. JUSTICE NICOL: Just a moment, I will make a note. (Pause)</p> <p>6 Mr. Sherborne, what I would also ask is that this is something</p> <p>7 that is dealt with by a further witness statement from</p> <p>8 Mr. White, rather than require him to re-attend for further</p> <p>9 examination.</p> <p>10 MR. SHERBORNE: My Lord, yes. I am sure that would be helpful.</p> <p>11 I am sure he would appreciate that.</p> <p>12 MR. JUSTICE NICOL: Good.</p> <p>13 MR. SHERBORNE: I was going to just check where we had got to on</p> <p>14 your Lordship's list of items.</p> <p>15 MR. JUSTICE NICOL: Let me just turn it up. I had found it, but</p> <p>16 I am just going to have to find it again. (Pause)</p> <p>17 MR. SHERBORNE: If it helps, I can give you the e-mail date and</p> <p>18 time.</p> <p>19 MR. JUSTICE NICOL: I have that and I printed it off. Yes.</p> <p>20 MR. SHERBORNE: There were four items. I think we have dealt</p> <p>21 with (A), subject to this afternoon. (B) was the application</p> <p>22 by the Press Association. As I say, I think there has been a</p> <p>23 form of application. I do not know what particular documents</p> <p>24 they are asking for. (C) is really a matter for</p> <p>25 your Lordship, although your Lordship was kind enough to copy</p>	<p>1 DISCUSSION</p> <p>2 MR. SHERBORNE: Yes.</p> <p>3 MR. JUSTICE NICOL: If the Press Association want to make any oral</p> <p>4 submissions to me about that, then perhaps we can do that this</p> <p>5 afternoon as well.</p> <p>6 MR. SHERBORNE: My Lord, yes, that would make sense. I have not</p> <p>7 unfortunately had an opportunity to see their submissions, so</p> <p>8 I am afraid I cannot ----</p> <p>9 MR. JUSTICE NICOL: There was an e-mail sent to me. I thought it</p> <p>10 was forwarded to, or copied to you, but ----</p> <p>11 MR. SHERBORNE: It may have been forwarded to me. I am not</p> <p>12 criticising anyone for not doing so. I just have not read it.</p> <p>13 I do not remember seeing it and I will have a look at it.</p> <p>14 MR. JUSTICE NICOL: All right. If it has not found its way to</p> <p>15 you, then that can be remedied.</p> <p>16 MR. SHERBORNE: My Lord, yes, exactly.</p> <p>17 MR. JUSTICE NICOL: All right. Then break for lunch.</p> <p>18 MR. SHERBORNE: I am grateful.</p> <p>19 MR. JUSTICE NICOL: We will say five past two.</p> <p>20 MR. SHERBORNE: Thank you, my Lord.</p> <p>21 (Adjourned for a short time)</p> <p>22 MR. JUSTICE NICOL: Mr. Sherborne.</p> <p>23 MR. SHERBORNE: Yes, I was just about to say, before your Lordship</p> <p>24 came in, that I do not know whether the feed is ready for our</p> <p>25 next witness, but your Lordship's entrance rather cut across</p>
[Page 992]	[Page 994]
<p>1 DISCUSSION</p> <p>2 us into the correspondence. (D) has been conceded by</p> <p>3 Ms. Wass. I do not know whether your Lordship wishes to say</p> <p>4 something about (C) before the short adjournment.</p> <p>5 MR. JUSTICE NICOL: Well, you have seen the correspondence that</p> <p>6 Mr. Stephens wrote to me. The position is that the allocation</p> <p>7 of seats within the courtroom and the spill-over rooms is an</p> <p>8 administrative matter and I am not inclined to become further</p> <p>9 involved with that.</p> <p>10 MR. SHERBORNE: It is entirely a matter for your Lordship.</p> <p>11 MR. JUSTICE NICOL: Mr. Stephens, on behalf of CNN, considers</p> <p>12 there a problem with that, there are various avenues open to</p> <p>13 him.</p> <p>14 MR. SHERBORNE: My Lord, we have no observations. It is entirely</p> <p>15 a matter for your Lordship. I do not know if Ms. Wass has</p> <p>16 anything to say on the subject?</p> <p>17 MS. WASS: No, thank you.</p> <p>18 MR. SHERBORNE: Then that really leaves (B). I wonder whether,</p> <p>19 over the short adjournment, I can look at what actual</p> <p>20 documents the Press Association are asking for.</p> <p>21 MR. JUSTICE NICOL: Yes. I mean, there is a question of timing as</p> <p>22 to when documents can be made available to third party</p> <p>23 requesters. I saw something in the Press Association's</p> <p>24 submission about going beyond the CPR. I would need to be</p> <p>25 persuaded that is what should happen.</p>	<p>1 DISCUSSION</p> <p>2 the question I was going to ask. I do not know whether</p> <p>3 your Lordship wants to ----</p> <p>4 MR. JUSTICE NICOL: Do you want me to go out again?</p> <p>5 MR. SHERBORNE: Perhaps that might be sensible, yes.</p> <p>6 MR. JUSTICE NICOL: All right.</p> <p>7 MR. SHERBORNE: Thank you.</p> <p>8 (A short break)</p> <p>9</p> <p>10 MR. JUSTICE NICOL: Mr. Sherborne.</p> <p>11 MR. SHERBORNE: My Lord, can we call our next, witness, please,</p> <p>12 Samantha McMillen.</p> <p>13 MR. JUSTICE NICOL: Ms. McMillen, can you hear us?</p> <p>14 THE WITNESS: Yes, I can hear you.</p> <p>15 MR. JUSTICE NICOL: Good. First of all, thank you for coming to</p> <p>16 give evidence at this trial, and thank you also if the time is</p> <p>17 not the most convenient. In a moment, you are going to be</p> <p>18 asked to either swear to tell the truth or to affirm. It is a</p> <p>19 matter completely for you. Which would you prefer to do?</p> <p>20 THE WITNESS: Affirmation is fine with me.</p> <p>21 MR. JUSTICE NICOL: All right. Then, would you please listen</p> <p>22 while the usher takes you through the affirmation and we will</p> <p>23 ask you to repeat it.</p> <p>24</p> <p>25</p>

[24] (Pages 991 to 994)

[Page 995]

1 McMILLEN
2 MS. SAMANTHA McMILLEN, AFFIRMED
3 EXAMINED BY MR. SHERBORNE
4 (through video link)
5 MR. JUSTICE NICOL: Thank you, Ms. McMillen. You are now about to
6 be asked questions by Mr. Sherborne, who represents Mr. Depp.
7 Yes, Mr. Sherborne.
8 MR. SHERBORNE: Ms. McMillen, can you give your full name to the
9 court, please?
10 A. Samantha Dawn McMillen.
11 Q. Ms. McMillen, we have said this to a number of witnesses who
12 have given evidence by way of video link that there are
13 obviously a number of consequences of giving evidence by way
14 of video link. Particularly where you are sitting in
15 Los Angeles and we are in London, there is something of a time
16 delay between my speaking and you hearing what I am saying or
17 anyone else.
18 A. Okay.
19 Q. So, we will do our best to try and avoid talking over you
20 while you are still giving an answer, and please do say if you
21 do not hear something properly or someone talks over you and
22 you want to finish what you are saying.
23 A. Okay.
24 Q. I am grateful. Can I just start then by taking you to your
25 witness statement. You should have to your left a number of

[Page 996]

1 McMILLEN - SHERBORNE
2 bundles. Hopefully, there will be one marked file 2.
3 A. Okay.
4 Q. If you turn to one of the internal tabs or dividers marked 41,
5 I am hoping behind there, you will find a document entitled
6 "First witness statement of Sam McMillen"; is that correct?
7 A. Yes.
8 Q. If we turn to the end of your statement, we see your
9 signature. Can you confirm to the court that this is your
10 signature?
11 A. Yes, that is my signature.
12 Q. Before I ask you the next question, to confirm the contents, I
13 understand that there is a date you want to correct in
14 paragraph 9 and I think it is three lines up. Do you see?
15 A. Yes.
16 Q. I think it is the May 22nd figure; can you explain?
17 A. It says, "I was aware that Mr. Depp left Los Angeles on May
18 22nd, 2016." I got the date incorrect because I was thinking
19 that was the day I was at the Alice through the Looking Glass
20 premier, because I knew that he flew out right after, and that
21 date was actually the 23rd. I just got the date wrong.
22 Q. So the date is May 23rd?
23 A. Yes.
24 Q. Thank you. I am just going to let his Lordship make a note of
25 that. I am grateful. Other than that, can you confirm that

[Page 997]

1 McMILLEN - SHERBORNE
2 the facts in your witness statement are true?
3 A. Yes.
4 MR. SHERBORNE: Thank you very much, Ms. McMillen. If you wait
5 there, Ms. Wass, on behalf of the defendants, will have some
6 questions for you.
7 THE WITNESS: Should I leave the document open?
8 MR. SHERBORNE: Yes, you might as well leave it open. You may be
9 taken to other documents, but you can leave it there.
10 MR. JUSTICE NICOL: Yes, Ms. Wass.
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[Page 998]

1 McMILLEN
2 CROSS-EXAMINED BY MS. WASS
3 MS. WASS: Ms. McMillen, you are a stylist, is that correct, by
4 occupation?
5 A. Yes, that is correct.
6 Q. You work in Hollywood?
7 A. Yes. I live in Hollywood.
8 Q. Sorry?
9 A. I live in Hollywood and I work in Hollywood.
10 Q. You live in Hollywood and you work in Hollywood. Is it the
11 position that most of your clientele is in Hollywood?
12 A. Not necessarily, no.
13 Q. But you are based in Hollywood?
14 A. Yes.
15 Q. And you have been Mr. Depp's stylist for how long?
16 A. Since about 2002, so about 18 years.
17 Q. 18 years. Mr. Depp is a very influential figure in Hollywood,
18 is he not?
19 A. I would say so, yes.
20 Q. Now, while Mr. Depp was in a relationship with Amber Heard,
21 you worked for a while as Amber Heard's stylist; do you agree?
22 A. Yes.
23 Q. You are no longer Ms. Heard's stylist, are you?
24 A. No.
25 Q. Are you still Mr. Depp's stylist?

[25] (Pages 995 to 998)

[Page 999]

1 McMILLEN - WASS
 2 A. Yes.
 3 Q. All right. That gives us an idea of your relationship. Now,
 4 the purpose of your witness statement, you were asked to make
 5 a witness statement about whether you had seen injuries on
 6 Ms. Heard; do you agree?
 7 A. Yes.
 8 Q. And you were asked about two specific dates; one is 16th
 9 December 2015?
 10 A. Yes.
 11 Q. And the other is ----
 12 MR. JUSTICE NICOL: Just a moment. Ms. McMillen, I could see you
 13 nodding in response to that last question, but it is necessary
 14 for us to get an answer that you speak; do you understand?
 15 THE WITNESS: I do. I did say "Yes" as I was nodding.
 16 MR. JUSTICE NICOL: You did indeed, and I am just reminding you
 17 that a nod or a shake, without a spoken response, is less
 18 useful for us.
 19 THE WITNESS: I understand. Thank you.
 20 MR. JUSTICE NICOL: Good.
 21 MS. WASS: Ms. McMillen, the two dates that you were asked to
 22 speak about in your statement were 16th December, 2015 and a
 23 date in 2016, 24th May; do you agree?
 24 A. Yes.
 25 Q. In respect of those two dates, you have given evidence in a

[Page 1000]

1 McMILLEN - WASS
 2 sworn witness statement that Ms. Heard did not have any
 3 visible injuries?
 4 A. That is correct.
 5 Q. Can I start, then, please, with 16th December 2015 and ask you
 6 to take a bundle with a number 6 marked on the spine.
 7 A. Okay.
 8 Q. Could you please go to tab 148C?
 9 A. Okay.
 10 Q. Can you see some numbers at the bottom of the page which start
 11 F894., and then there are extra numbers?
 12 A. Yes.
 13 Q. Could you please start by looking at 894.103. Have you got
 14 that photograph?
 15 A. Yes.
 16 Q. That is a photograph of Ms. Heard, do you agree?
 17 A. Yes.
 18 Q. And the court will hear evidence that that photograph was
 19 taken on 16th December, 2015.
 20 A. Okay.
 21 Q. Is that the way Ms. Heard looked to you when you saw her on
 22 that date?
 23 A. That is not how I remember her looking on that date.
 24 Q. Because the photograph that you have looked at, would you
 25 agree, shows that she has got bruising coming up underneath

[Page 1001]

1 McMILLEN - WASS
 2 both eyes?
 3 A. It is not a very clear picture, but it does look like there is
 4 dark around her eyes.
 5 Q. All right. If you want to go ahead, we see another photograph
 6 at 894.107. Is that a better photograph than your copy,
 7 showing bruising around the eyes?
 8 A. It looks different.
 9 MR. JUSTICE NICOL: There are two, at least in mine -- oh, it may
 10 just be that I have two numbered 107.
 11 MS. WASS: Yes. What my Lord has is the photograph quality which
 12 this witness does not have. There is one on photographic
 13 paper and one on copy paper.
 14 MR. JUSTICE NICOL: Yes.
 15 MS. WASS: Can you see on F894.107 the bruising around the eyes on
 16 your copy?
 17 A. It looks different than in the previous picture, but yes, I
 18 see some marking around her eyes.
 19 MR. JUSTICE NICOL: I am sorry, Ms. McMillen, I could not hear
 20 your answer. Can you just repeat what you said?
 21 A. I said it looks different than in the previous photo, but yes,
 22 I can see that there is marking around her eyes.
 23 MS. WASS: Can you go to F894.109?
 24 MR. JUSTICE NICOL: Just a minute. (Pause) 109, Ms. Wass?
 25 MS. WASS: Yes. Have you got that, Ms. McMillen?

[Page 1002]

1 McMILLEN - WASS
 2 A. Yes, I do.
 3 Q. And can you see on that photograph a slight mark on
 4 Ms. Heard's lower lip?
 5 A. I do not see that on this photo.
 6 Q. Let me take you to another photograph then. Can you go to
 7 F894.114? Do you see the mark on the lower lip in that
 8 photograph?
 9 A. Somewhat.
 10 Q. Is your answer to the question somewhat; you see somewhat a
 11 mark?
 12 A. Yes.
 13 Q. All right. Then, going to the end of that section, could you
 14 go to F894.145. That is a photograph of the crown of a
 15 person's head; do you agree?
 16 A. Yes.
 17 Q. And can you see that where the actual crown is, there is
 18 reddening of the scalp?
 19 A. I think so, yes.
 20 Q. Just for the avoidance of doubt, I am going to ask you to look
 21 at one more photograph, which is F894.143.
 22 MR. JUSTICE NICOL: This is going backwards.
 23 MS. WASS: It is a photograph of Ms. Heard's lower lip at quite
 24 close range; do you agree?
 25 A. Yes.

[Page 1003]

1 McMILLEN - WASS
 2 Q. And do you agree that on that photograph, you can see an
 3 injury to her lower lip?
 4 A. I do not think these copies are as clear as possibly yours. I
 5 do see something that looks like it could be a mark, but it is
 6 not as clear on this photo.
 7 Q. Can we then just agree that you see a mark on her lower lip;
 8 yes?
 9 A. Yes.
 10 Q. Thank you. Now, your evidence is that you never saw any of
 11 these injuries on the afternoon or the night of 16th December
 12 when you were with Ms. Heard?
 13 MR. JUSTICE NICOL: Is it the 16th or the 15th?
 14 MS. WASS: I think this witness says the 16th. Ms. McMillen,
 15 I think you were with Ms. Heard on 16th December because she
 16 had to appear on a television show?
 17 A. That is correct, yes.
 18 Q. Are you saying that you never saw her with any of the marks
 19 that we have looked at in the photographs that I have shown
 20 you a moment ago?
 21 A. That is correct.
 22 Q. You say that you saw her without makeup?
 23 A. She did not appear to be wearing makeup when I saw her.
 24 Q. You saw no sign of any bruising to the eyes, marks on the lip
 25 or she did not complain about any injury to the head?

[Page 1004]

1 McMILLEN - WASS
 2 A. There was nothing that I noticed.
 3 Q. I am going to ask you to look at a series of complaints that
 4 Ms. Heard made at this time. Do you understand what I am
 5 saying?
 6 A. I am not sure.
 7 Q. Let me explain. Ms. Heard told a number of people on the 15th
 8 and 16th about these injuries, and I am going to ask you to
 9 say whether you can comment on them; all right?
 10 A. Okay.
 11 Q. Could you take up file 7, please.
 12 MR. JUSTICE NICOL: Can we put 6 away?
 13 MS. WASS: For now, yes. Have you got file 7?
 14 A. I do, yes.
 15 Q. If you go to tab 10B?
 16 A. Did you say B or D?
 17 Q. B for Bravo.
 18 A. I see 10A. I see, sorry, I am not -- I see tab A and maybe
 19 see D.
 20 Q. You do not see a B?
 21 A. Okay, I think I might be -- okay, I think I am in the right
 22 place.
 23 Q. If you look at the bottom of the first page behind B, it says
 24 H38 on the bottom right?
 25 A. The first (unclear).

[Page 1005]

1 McMILLEN - WASS
 2 Q. In fact, turn to H39, if you would?
 3 A. Okay.
 4 Q. It should be on the back of H38. Has my Lord got it?
 5 MR. JUSTICE NICOL: I do.
 6 MS. WASS: Can you see, Ms. McMillen, that that is a printout of
 7 some sort and if you look at the middle, at the top of the
 8 middle, under the word "Attachments", it says 12/15/2015 at
 9 9.26 p.m. Do you see that?
 10 A. Yes.
 11 Q. It would appear from that to bear a date of 15th December
 12 2015?
 13 A. Yes.
 14 Q. Underneath that date, three lines down, is the name Connell
 15 Cowan MD.
 16 A. Yes.
 17 Q. And do you know who Connell Cowan MD was?
 18 A. I do not.
 19 Q. A Dr. Connell Cowan, did Ms. Heard never mention to you that
 20 she was having, being treated for anxiety by Dr. Cowan?
 21 A. No, she did not say anything like that to me.
 22 Q. She did not say anything like that to you. The message at the
 23 bottom of that page, in the printing, is timed at 11 o'clock
 24 and 52 seconds p.m., can you see that, the far right bottom?
 25 A. Yes.

[Page 1006]

1 McMILLEN - WASS
 2 Q. From AH, I am going to suggest that is Amber Heard, and it
 3 says, "Emergency, can you please call?" Do you see that?
 4 A. Yes.
 5 Q. You said you did not have any discussion with Ms. Heard about
 6 Dr. Cowan. How close would you say you were to Ms. Heard?
 7 A. We have a good working relationship.
 8 MR. JUSTICE NICOL: Just a minute, please. (Pause) Yes.
 9 MS. WASS: Would she confide ---
 10 MR. JUSTICE NICOL: Just a minute. Did you finish your answer,
 11 Ms. McMillen?
 12 THE WITNESS: I was going to say we have a good working
 13 relationship and I would check in with her, how are you doing?
 14 Kind, we had a kind relationship with each other at the time.
 15 MS. WASS: Would she confide in you?
 16 A. I would not say, no, I would not be on her speed dial, no.
 17 Q. Would you go in that same file to file 13A, tab 13A.
 18 A. 13A?
 19 Q. Yes, 13A.
 20 A. Okay.
 21 Q. Have you got that?
 22 A. Yes.
 23 Q. This is in a slightly different format of a text message, but
 24 you can see the participants, if you look at the top, it says
 25 "Custodian Amber Heard", do you see that?

[Page 1007]

1 McMILLEN - WASS
 2 A. I am sorry, just remind me what page we are on, I am so sorry.
 3 Q. It is my fault for not saying that. It should say at the
 4 bottom right-hand corner H81.1.
 5 MR. JUSTICE NICOL: Can you see that, Ms. McMillen, that number?
 6 THE WITNESS: I am just finding it. I see H81. I do not see an
 7 81.1.
 8 MS. WASS: Go to the next tab, behind 81.
 9 A. Okay. I have it.
 10 Q. So, look at the top left-hand corner, and can you see the word
 11 "Custodian" under which is the name "Amber Heard"?
 12 A. Yes.
 13 Q. And the start date is, it says 12.16.2015, at 1.05 a.m. Do
 14 you see that?
 15 A. I am sorry ----
 16 Q. Let me help you. Do you see where Amber Heard's name is
 17 written?
 18 A. Yes, I see that.
 19 Q. Two blocks to the right there is a date. Can you see the
 20 date?
 21 A. Yes.
 22 Q. And the date is 16th December 2015, so the day after the
 23 "Please call, emergency" communication. If you look down,
 24 under the row that says "Custodian Amber Heard", we have
 25 participants, "Connell Cowan MD", so Dr. Cowan again. Do you

[Page 1008]

1 McMILLEN - WASS
 2 see that?
 3 A. Yes.
 4 Q. Dr. Cowan starts, he is the yellow messages and Ms. Heard is
 5 the blue messages, said: "Tried to reach you by phone
 6 earlier, hope you're okay". Do you see that message?
 7 A. Yes.
 8 Q. The blue message says "AH" on the left-hand side of it. Do
 9 you see that?
 10 A. I do, yes.
 11 Q. And it reads: "Johnny did a number on me tonight. I'm safe
 12 and with my support but need some real help. Can I come
 13 tomorrow. I called earlier because I thought I had concussion
 14 and didn't know if I should have called police, but I have a
 15 nurse close to me and Rocky" -- and then I think it has cut
 16 off -- "have been here for me. Can I see you tomorrow"; yes?
 17 A. Yes.
 18 Q. Did Ms. Heard ever say to you that Rocky had -- sorry, that
 19 Johnny had done a number on her?
 20 A. She never said anything about that to me.
 21 Q. Do you consider that your loyalties are more with Mr. Depp
 22 than with Ms. Heard?
 23 A. I am not sure what you are asking.
 24 Q. Well, you have a longstanding relationship with Mr. Depp; yes?
 25 A. Yes.

[Page 1009]

1 McMILLEN - WASS
 2 Q. He is a big figure in Hollywood?
 3 A. Yes.
 4 Q. I am asking you whether, if there was a conflict of loyalties
 5 between Mr. Depp, your loyalties to Mr. Depp on the one hand,
 6 and any loyalty you might have to Ms. Heard on the other, who
 7 would take priority?
 8 A. I worked with them both at the time, and I had a -- I was
 9 close with her at the time. I cared about her. I do not know
 10 what you are insinuating, but I would not perjure myself for
 11 anyone for any reason.
 12 Q. I have not even come to perjury yet, Ms. McMillen, I am asking
 13 you where your loyalties lie?
 14 A. I do not know what you are saying. I am obviously loyal,
 15 because he is kind and loyal back, but without any other
 16 reason than that.
 17 Q. Can you think of any reason why Ms. Heard would be contacting
 18 a doctor ----
 19 MR. SHERBORNE: My Lord, with respect, this is asking a witness to
 20 speculate. Perhaps I can deal with it without Ms. Wass having
 21 a side conversation with me. This is the problem we have
 22 faced a number of times. Because Ms. Heard says something
 23 happened does not mean it happened. What Ms. Wass is trying
 24 to do is either trying to get Ms. McMillen to accept, off the
 25 back of some texts, what your Lordship needs to decide, which

[Page 1010]

1 McMILLEN - WASS
 2 is whether or not Mr. Depp did hit Ms. Heard, as she has
 3 accused, or to speculate, if that is not the case, why she
 4 would have made it up. The first is a question for
 5 your Lordship, not for Ms. McMillen; the second, speculation,
 6 is utterly irrelevant. That is why this repeated exercise of
 7 taking witnesses to documents which have nothing to do with
 8 them, which bear an account by Ms. Heard, and then asking them
 9 either to accept that account is true, when they cannot say
 10 that, because they are not said to have even witnessed it; or
 11 to speculate as to why Ms. Heard might have made it up, is an
 12 impermissible one and it has gone on long enough, in my
 13 submission.
 14 MR. JUSTICE NICOL: Thank you.
 15 MS. WASS: My Lord, it is not impermissible. I am not asking for
 16 the witness to say whether something is true or not. I am
 17 only asking the witness whether the witness knows of any
 18 reason why Ms. Heard might say it, if it is not true. That is
 19 a perfectly well-trodden question in cases of this nature.
 20 I am not inviting speculation. If this witness knows of any
 21 reason why Ms. Heard might want to invent this allegation to
 22 her doctor, she should be given an opportunity of putting it
 23 forward.
 24 MR. JUSTICE NICOL: You may answer the question, Ms. McMillen.
 25 THE WITNESS: I am so sorry, I am not actually sure what the

[Page 1011]

[Page 1013]

1 McMILLEN - WASS
 2 question is.
 3 MR. JUSTICE NICOL: If I may say so, that is understandable,
 4 because it has been interrupted. But I will ask Ms. Wass to
 5 put it again.
 6 MS. WASS: Ms. McMillen, do you know of any reason why Ms. Heard
 7 would contact her doctor, describing what had happened to her
 8 as an emergency, followed by a text suggesting that Johnny had
 9 beaten her up, unless it was true?
 10 THE WITNESS: I do not know the answer to that.
 11 Q. All right. You do not know of a reason why she would make
 12 something up ----
 13 MR. JUSTICE NICOL: You have had the answer, Ms. Wass.
 14 MS. WASS: All right. Can we go to tab 17, please.
 15 MR. JUSTICE NICOL: Still within 7?
 16 MS. WASS: They are all going to be within 7. Have you got tab 17
 17 Ms. McMillen?
 18 THE WITNESS: Yes.
 19 Q. Again, can you see top left-hand corner, "Amber Heard"?
 20 A. Yes.
 21 Q. It is, again, 16th December, the very day you say you saw her
 22 with no injuries. Do you agree?
 23 A. I am sorry, I am sort of having a hard time (unclear), would
 24 you mind repeating that one more time?
 25 Q. The date of this communication, which I am about to ask you to

1 McMILLEN - WASS
 2 A. Yes.
 3 Q. "When are you back? I'm hurt. I don't know what to do." All
 4 right?
 5 A. Yes.
 6 Q. So, the same question I asked you in respect of Dr. Cowan, can
 7 you think of any reason why Ms. Heard would make a complaint
 8 that she had been beaten up pretty good, as she has said, to
 9 iO Tillet Wright, unless it was true?
 10 A. I do not know the answer to that.
 11 Q. Can you then go to file 7, tab 16, please, so you have to go
 12 back. Have you got that?
 13 A. Yes.
 14 Q. You are probably becoming familiar with the format now, we see
 15 "Custodian, Amber Heard"; yes?
 16 A. Yes. I am sorry, this is page H103.
 17 Q. You are absolutely right. Sorry, yes. Participants are
 18 listed, and participant number 1 is, it is says, "Rock".
 19 A. Uh-huh.
 20 Q. Do you know Rocky Pennington, do you know who she is?
 21 A. Yes.
 22 Q. Yes?
 23 A. Yes.
 24 Q. If we look to the body of the text, you can see just parallel
 25 to the top hole punch, there is a text that says, it is the

[Page 1012]

[Page 1014]

1 McMILLEN - WASS
 2 deal with, was 16th December 2015. Can you see it says,
 3 "Start", in the top middle row?
 4 A. Yes.
 5 Q. And the participant, under "Participant 1", can you see
 6 "Participant 1" on the left-hand column, four down,
 7 "Participant #1"?
 8 A. Yes.
 9 Q. And there is a long number and then the word "iO"?
 10 A. Yes.
 11 Q. Do you know who iO is, just out of interest?
 12 A. Yes, I do.
 13 Q. Is that iO Tillet Wright?
 14 A. I actually do not know iO's last name.
 15 Q. You know him as iO?
 16 A. Yes.
 17 Q. The body of the text from Ms. Heard, can you see the date it
 18 says 12/16/2015, Wednesday, you see where that is?
 19 A. Yes.
 20 Q. And it is from AH, Ms. Heard: "I need you", do you see that?
 21 A. Yes, I do.
 22 Q. And the next line, from AH to iO: "J beat me up pretty good."
 23 Do you see that?
 24 A. Yes.
 25 Q. And the next line down: "Rock's on the couch with me now."

1 McMILLEN - WASS
 2 authorship of which is "Rock", do you see that, "Hey girl", do
 3 you see that, I will read on, but it is "Rock" and it says
 4 "Hey girl"?
 5 A. Yes.
 6 Q. Rock, I suggest, says: "Hey girl, so sorry, Amber had a shit
 7 day yesterday and we were doing some emotional damage control,
 8 I'll call you later." And it is replied to by somebody called
 9 Carly Koo(?)?
 10 A. Yes.
 11 Q. And staying, if we may, with Rocky Pennington, could you go to
 12 tab 18.
 13 A. Okay.
 14 Q. And that should read, H106 at the bottom; yes?
 15 A. Yes.
 16 Q. This is a phone message between three people, participant 0 is
 17 AH, that is Amber Heard; do you agree?
 18 MR. JUSTICE NICOL: Well, Ms. Wass, I am not sure how much
 19 Ms. McMillen's agreement or disagreement is going to take this
 20 further. All she can do is to see what is on the page.
 21 MS. WASS: I will then just not interrupt the narrative, if that
 22 is the way my Lord would prefer it to be done. I am happy to
 23 do it that way.
 24 Ms. McMillen, on page 106, we see there are three
 25 participants, Ms. Heard, somebody called Rock, who I suggest

[29] (Pages 1011 to 1014)

[Page 1015]

1 McMILLEN - WASS
 2 is Rocky Pennington, and iO, who I suggest is iO
 3 Tillet Wright. We go forward, do we not, to 12.17.2015, which
 4 is the date there, with something sent by an attached file
 5 link. Can you turn over the page to H107.
 6 A. Okay.
 7 Q. Do you see there are a series of attachments, which
 8 are images, on the box on the left-hand side, it says
 9 attachment?
 10 A. Yes.
 11 Q. And there are seven photographs, images is the correct word;
 12 yes?
 13 A. Yes.
 14 Q. Can you see H108, there is the photograph of Ms. Heard that
 15 I have shown you already?
 16 A. Yes.
 17 Q. When you said there were some marks there, but this is
 18 certainly not what you saw. H109, another photograph of
 19 Ms. Heard. Do you agree that those are markings under her
 20 eyes, signs of injury under her eyes. Do you agree?
 21 A. I see marking under her eyes.
 22 Q. All right. H110, the same markings?
 23 A. Yes.
 24 Q. H111, do you see the lip marking on H111 and H112?
 25 A. It is difficult to discern on these photos that there is

[Page 1016]

1 McMILLEN - WASS
 2 anything on her lip.
 3 Q. I will not press you on that. But there are seven photographs
 4 in that text that was sent on 17th December. Can you think of
 5 any reason why Ms. Heard would send photographs of herself to
 6 two of her friends, which I suggest do show injuries, unless
 7 she was indeed injured on that date, by that date?
 8 A. I do not know.
 9 Q. Can you go to 20B, please.
 10 MR. JUSTICE NICOL: Tab 20B.
 11 MS. WASS: Yes. This is a text chain between Ms. Heard and Rocky
 12 Pennington, and what she says in the middle, is: "I'm being
 13 strong, basically faking it." Do you see that?
 14 MR. JUSTICE NICOL: Just a minute.
 15 THE WITNESS: I am sorry, what page ----
 16 MR. JUSTICE NICOL: Just a minute please, Ms. McMillen. What is
 17 the number at the bottom of the page?
 18 MS. WASS: H129.2.
 19 MR. JUSTICE NICOL: Yes. Have you got H129.2, Ms. McMillen?
 20 THE WITNESS: Yes, I do.
 21 Q. Can you see what Ms. Wass is asking you to look at, which
 22 I think is in pretty much the middle of the page: "I'm being
 23 strong, basically faking it ", can you see that?
 24 A. Yes, I see that.
 25 MS. WASS: When Ms. Heard did her television programme on the

[Page 1017]

1 McMILLEN - WASS
 2 night of the 16th, that was the sort of thing she was saying,
 3 she was going to get through this, she was going to be strong.
 4 She said that to you, did she not?
 5 THE WITNESS: I do not recall.
 6 MR. JUSTICE NICOL: Just a minute. (Pause) Yes.
 7 MS. WASS: Then the reply from Rocky Pennington is survivable.
 8 Ms. Heard says, she is recounting a conversation: "I said you
 9 headbutted me, and his response, 'I just gave you a little
 10 knock with my head'. And then he left the room after saying
 11 what a fuck-up he was and such. Fucking feeling sorry for
 12 himself. Poor him." Did you know nothing about any -- did
 13 Ms. Heard ever make a complaint to you about anything that had
 14 happened between herself and Mr. Depp just before
 15 16th December, the date before 16th December?
 16 A. The only thing she ever said to me was what is in my
 17 statement, after she did the Cordon show, "Can you believe
 18 I did that show with two black eyes?"
 19 MR. JUSTICE NICOL: Just slow down, please. Can you repeat what
 20 you said, Ms. McMillen, "Can you believe I did that show", and
 21 then you said, something else.
 22 THE WITNESS: With two black eyes.
 23 MR. JUSTICE NICOL: With two black eyes. Yes.
 24 MS. WASS: Can you go to file 8.
 25 MR. JUSTICE NICOL: If you are going to move on from that, can

[Page 1018]

1 McMILLEN - WASS
 2 I ask, Ms. McMillen, as far as you could see, did Ms. Heard
 3 have two black eyes?
 4 THE WITNESS: I never noticed anything like that on her.
 5 Q. Sorry, I could not hear your answer?
 6 A. I never noticed her having two black eyes.
 7 MR. JUSTICE NICOL: You do not remember her having two black eyes.
 8 MR. SHERBORNE: My Lord, she said "I never noticed anything like
 9 that".
 10 MR. JUSTICE NICOL: Thank you.
 11 MS. WASS: So, after Ms. Heard said to you, "Can you believe I did
 12 this show with two black eyes", if you did not see any black
 13 eyes, did you not ask her what on earth she was talking about?
 14 THE WITNESS: I did not. We were leaving at the end of the show,
 15 we were going separate ways, we were saying goodbye. I was
 16 confused by it, and I think I said something like, "I do not
 17 know what to say", and we hugged goodbye, because we were not
 18 going to see each other for a while because of the Christmas
 19 holiday, and that was, it was a long day ----
 20 MR. JUSTICE NICOL: Sorry, did you say, "I do not know what you
 21 are talking about", is that your answer?
 22 THE WITNESS: No, I said I think I said something like, "I do not
 23 know what to say".
 24 MS. WASS: "I do not know what to say"?
 25 A. I believe it was something along that line, because I did not

[Page 1019]

1 McMILLEN - WASS
 2 know what to say, because I did not see the black eyes, but
 3 I also -- I did not want to, you know, raise any sort of --
 4 I just wanted to go home, you know.
 5 MR. JUSTICE NICOL: I did not want to -- can you repeat the
 6 answer, please. "I did not want to ----"
 7 MR. SHERBORNE: She said "I did not want to raise anything, I just
 8 wanted to go home", my Lord.
 9 THE WITNESS: Yes.
 10 MS. WASS: I am going to read a text for you, to save you getting
 11 another volume out, unless you would like to see it. On the
 12 day of 16th December, early in the morning, Ms. Heard e-mailed
 13 Jodie Gottlieb, who was her assistants of some sorts. Do you
 14 know Jodie Gottlieb?
 15 A. I do.
 16 Q. The message reads as follows: "I had a bad accident tonight
 17 Jodie. I'm really bruised and might have a black eye or two
 18 tomorrow, same with my nose. ...(reads to the words)... I'll
 19 call you tomorrow to let you know." Can you think of any
 20 reason why Ms. Heard would be telling her assistant that she
 21 might not be able to do a television show because of her black
 22 eyes, unless she actually had what she thought might develop
 23 into two black eyes?
 24 A. I cannot think of why she would do that.
 25 Q. Can I ask you this: after she said to you that she could not

[Page 1020]

1 McMILLEN - WASS
 2 believe she had got through the show with two black eyes, did
 3 you not think to offer her some sort of support or make some
 4 sort of enquiry, rather than just quickly leave?
 5 A. I gave her a hug.
 6 Q. Yes. You gave her a hug that night, because she had found it
 7 very difficult to put on a brave face and get through that
 8 show, did she not?
 9 A. I do not know that.
 10 Q. Were you there when her makeup was being done?
 11 A. Yes. I was in the room.
 12 MR. JUSTICE NICOL: Just a minute. (Pause) Is this the makeup for
 13 the show?
 14 MS. WASS: Yes, this was for her television appearance. Do you
 15 agree?
 16 THE WITNESS: Yes.
 17 Q. Melanie Inglessis was the person who did her makeup?
 18 A. Yes.
 19 Q. And do you remember Melanie Inglessis saying she was going to
 20 put a really bright red lipstick on Ms. Heard to try and cover
 21 the mark on her lip?
 22 A. I do not remember that conversation.
 23 Q. You were in the room when this was going on, were you not?
 24 MR. JUSTICE NICOL: Just a minute. Just a minute please. (Pause)
 25 I think you have said you were in the room?

[Page 1021]

1 McMILLEN - WASS
 2 A. Yes, yes, but may I explain what the room and my part in it
 3 were?
 4 Q. Yes, please do.
 5 A. I am not sure how to describe it, but it is a sort of a
 6 closet, a closet dressing room with seating, with a bathroom,
 7 and also next to a large closet where she keeps all her
 8 clothes. So I was between the bathroom, setting up the
 9 jewellery, and between one area where there were clothes and
 10 in the closet, either putting things away or getting things
 11 out. So, I was not sitting in the room listening the entire
 12 time.
 13 MS. WASS: Do you remember Ms. Inglessis putting on particularly
 14 heavy makeup on Ms. Heard that night to cover the injuries?
 15 A. I did not notice it being any heavier than usual.
 16 MR. JUSTICE NICOL: You do not recall it being heavier than usual;
 17 is that your evidence?
 18 A. That is correct.
 19 MS. WASS: If you have file 7 in front of you still, could you go
 20 tab 19A, and the bottom number is H127.1?
 21 A. Okay.
 22 MR. JUSTICE NICOL: Just a minute. (Pause) Yes.
 23 MS. WASS: This is an e-mail chain starting from the 17th, so the
 24 day after the show, between Ms. Heard and somebody called Erin
 25 Burin. Can you see on the yellow stripe, five lines down, it

[Page 1022]

1 McMILLEN - WASS
 2 says, "Participant 1, Erin Burin"?
 3 A. Yes.
 4 Q. The very last text says this: "Hey, I've had a headache
 5 basically for the last couple of days and I have been taking
 6 Advil non-stop. My head is still really bruised. I feel a
 7 lot of welts on it. I called Kipper's office and Liza and he
 8 was away until tomorrow, but that Monroe could look after me."
 9 Are you able to say why Ms. Heard might be complaining of
 10 having welts on her head and being bruised to her nurse, or to
 11 one of the nurses, unless this was true?
 12 A. I do not know the answer to that.
 13 Q. Go back to 19. This is the last one I am going to ask you
 14 about. Tab 19, please.
 15 MR. JUSTICE NICOL: Before we leave H127.1, the person who is
 16 being communicated with, Erin Burin, do you know Erin Burin,
 17 Ms. McMillen?
 18 A. No, I did not know Erin.
 19 MR. JUSTICE NICOL: 19.
 20 MS. WASS: Yes, tab 19, please, H116. Have you got that,
 21 Ms. McMillen?
 22 A. Yes.
 23 Q. Can you see that the participant there -- in fact, it is a
 24 number, but we will hear evidence that that was Ms. Heard's
 25 mother, Paige Heard. Had you ever met Paige ?

[Page 1023]

1 McMILLEN - WASS
 2 A. Yes, I have met her.
 3 Q. If I can read the body of the text, this is it still the 17th,
 4 so this is the day that Ms. Heard contacts the nurse. The
 5 yellow is messages from Paige Heard and the blue is from
 6 Amber Heard; all right? It reads as follows. Paige Heard
 7 said, "I can be there tomorrow", and there are three attached
 8 files, do you see, that were sent by Ms. Heard to her mother?
 9 A. Yes.
 10 Q. And Mrs. Heard says, "Yes, send the pictures and nothing else.
 11 I love you so damn much I will do absolutely anything for you.
 12 Your dad sent Steve a scathing text message." Was Steve a
 13 nickname that Ms. Heard would use for Mr. Depp?
 14 A. I do not know.
 15 Q. All right: "Your dad sent Steve a scathing text message. I am
 16 sorry, I told him he should have asked you, but you know men
 17 on men anger. He really (unclear) him. He compared you to
 18 Lily-Rose and how JD would feel. Your dad's blood is
 19 boiling." Ms. Heard then said, "Did dad see the pictures?"
 20 Paige Heard said, "Yep, he went through my messages to you.
 21 His e-mail was very good and I will send it as soon as his
 22 phone finishes its update. It's a good reaction and JD
 23 immediately texted back." Can you see for the remainder of
 24 that page, there are a number of files all linked, attached;
 25 yes?

[Page 1024]

1 McMILLEN - WASS
 2 A. Yes.
 3 Q. Go over the page, please, to H117. Then, Paige Heard said,
 4 "Amber, David sent none of these pictures." Ms. Heard goes,
 5 "What?" "He saw the pictures on my phone, sent two or three
 6 that I forwarded from his phone. David saw the pics on my
 7 phone and made a reference to them in his text." It goes on
 8 and her mother said, "It will be okay, my baby, I promise
 9 you." Then Ms. Amber Heard said, "Did he send that long
 10 bullshit text message to dad after or before he saw the
 11 pictures?" Mrs. Heard said, "He, dad, said he's done for the
 12 night, but his text was first." Then, lower down that page,
 13 Ms. Heard says, "Jesus, I just read that long text message.
 14 Can't believe how crazy he sounds. Nail polish? What the fuck
 15 is he talking about? He sounds out of his mind."
 16 Then Ms. Heard said, the second blue one from the
 17 bottom, "Please stop engaging with him. He's clearly still
 18 using and is ramping up and out of his mind."
 19 Miss Amber Heard then says, "I can't believe he's still
 20 justifying himself" and the text goes on. If you can turn
 21 over the page ----
 22 MR. JUSTICE NICOL: Ms. Wass, I think we need to have a question
 23 for Ms. McMillen.
 24 MS. WASS: Yes. Attached to those texts were the photographs over
 25 the page, H119, the picture of Ms. Heard's scalp with the

[Page 1025]

1 McMILLEN - WASS
 2 reddening.
 3 MR. JUSTICE NICOL: Well, now, Ms. Wass, I have listened to your
 4 questions, but is Ms. McMillen going to be able to say more
 5 about the pictures because this was not a text to her?
 6 MS. WASS: Can you just confirm that the pictures attached in that
 7 section are the pictures that you have already looked at ----
 8 MR. JUSTICE NICOL: Well, Ms. Wass, I am not sure that the
 9 witness's answer, whatever it might be, is going to help me.
 10 MS. WASS: All right.
 11 MR. JUSTICE NICOL: Either you are able to demonstrate that those
 12 were attached or you are not, but I am not sure that the
 13 witness, who did not see the text, and to whom the text was
 14 not sent, is going to be able to help.
 15 MS. WASS: Ms. McMillen, can you think of any reason why Ms. Heard
 16 would contact her mother, sending photographs of what
 17 I suggest are her injuries, if she had not had any injuries?
 18 A. I do not know why anyone would do that.
 19 Q. An alternative scenario to your evidence, Ms. McMillen, is
 20 that Ms. Heard was indeed injured. She had two black eyes, or
 21 the beginnings of two black eyes, she had a cut to her lip or
 22 an injury to her lip, and she had welts to her scalp where her
 23 hair had been pulled out. You say those were not there when
 24 you worked with her on the 16th?
 25 A. I said I did not see anything like that when I saw her.

[Page 1026]

1 McMILLEN - WASS
 2 Q. You saw Ms. Heard again on 24th May 2016?
 3 A. Correct.
 4 Q. And just as you have said there were no injuries that you saw
 5 on 16th December, your evidence in your statement is that she
 6 did not have marks on her face on 24th May; is that correct?
 7 A. That is correct.
 8 Q. Could you take file 6, please, and go behind tab 148E? Have
 9 you got that tab, Ms. McMillen?
 10 A. Yes.
 11 Q. Can you see a picture of Ms. Heard on page 8, F894.159?
 12 MR. JUSTICE NICOL: 159?
 13 MS. WASS: Yes. (Pause)
 14 A. I cannot see that page, sorry. You said 148?
 15 Q. Tab 148E?
 16 A. C, okay.
 17 MR. JUSTICE NICOL: No, E for Edward, Ms. McMillen.
 18 A. Thank you very much.
 19 Q. That is all right.
 20 A. I am sorry, would you remind me of the number again, I am
 21 sorry?
 22 MS. WASS: It is F894.159.
 23 A. Okay.
 24 MR. JUSTICE NICOL: Can you confirm that is a picture of
 25 Ms. Heard?

[Page 1027]

1 McMILLEN - WASS
 2 A. It looks like her, yes.
 3 MS. WASS: Are you able to see a red mark on her right cheek?
 4 A. In this picture, barely.
 5 Q. Barely? Are you saying there is a red mark, but it is
 6 difficult to see, or are you saying there is not a red mark?
 7 A. I am saying it is difficult to see, but it looks like there is
 8 part of her cheek that is ----
 9 Q. Part of her?
 10 A. ---- a darker colour than the rest of her face.
 11 Q. Part of her cheek is a darker colour than the rest of her
 12 face. Can you go over to F894.161?
 13 A. Okay.
 14 Q. Can you see the red mark in that photograph, Ms. McMillen?
 15 A. No.
 16 Q. I am going to ask that you are shown a better -- if my Lord
 17 will forgive me, because the quality of the photographs that
 18 my Lord has is better than the original one. I was going to
 19 ask the court associate to hold this picture up, like he did
 20 with the witness earlier, if that is possible. I understand
 21 it can actually be broadcast on the screen, which might be the
 22 best solution of all, which I would prefer to do if we can.
 23 MR. JUSTICE NICOL: Ms. McMillen, do you have a screen that you
 24 can see in front of you?
 25 THE WITNESS: Yes.

[Page 1028]

1 McMILLEN - WASS
 2 MR. JUSTICE NICOL: All right. Well, the photograph that you are
 3 being asked about is going to be projected, we hope, on to the
 4 screen and then Ms. Wass is going to ask you a question.
 5 MS. WASS: Yes. (Pause) Can I have my copy back, please? Yes, it
 6 is F894.161. Are you able to see that, Ms. McMillen?
 7 MR. JUSTICE NICOL: First of all, Ms. McMillen, can you tell us if
 8 you can see the photograph? (Pause) Okay. I am told that
 9 when there is click share on, we cannot be heard.
 10 MS. WASS: I understand. Perhaps we can take it off. Did you see
 11 that photograph, Ms. McMillen?
 12 A. Yes, I did.
 13 Q. Was that a better quality photograph than the one in your
 14 bundle?
 15 A. Yes.
 16 Q. And can you say what you saw in terms of reddening to
 17 Ms. Heard's face, if anything?
 18 A. It was a little bit red.
 19 Q. It was a little bit red. Did you see a mark above the eyebrow
 20 as well?
 21 A. I saw a mark, yes.
 22 Q. I am going to ask that another image is put up. We cannot
 23 speak to you when the image is put on the screen so I am going
 24 to ask that F894.163 is put up.
 25 MR. JUSTICE NICOL: You will need to come back to take the

[Page 1029]

1 McMILLEN - WASS
 2 photograph down.
 3 MS. WASS: Yes.
 4 MR. JUSTICE NICOL: Were you able to see that photograph,
 5 Ms. McMillen?
 6 A. Yes.
 7 MR. JUSTICE NICOL: Thank you.
 8 MS. WASS: Did you see a mark on Ms. Heard's face on that
 9 photograph?
 10 A. I did see that she has, yes.
 11 Q. And those photographs -- there will be evidence -- were taken
 12 on 21st May. Now, you saw Ms. Heard on 24th May?
 13 A. Yes.
 14 Q. Could we fast-forward in time to F894.241, please? You will
 15 be shown it on the screen, Ms. McMillen.
 16 A. Yes.
 17 Q. Did you see that photograph?
 18 A. Yes, I saw the one you put on the screen.
 19 Q. Do you agree that there were prominent injuries visible on
 20 Ms. Heard's face?
 21 A. Yes.
 22 Q. You have said in your witness statements that as far as the
 23 picture, the image of the 27th -- that is the one we last
 24 looked at where you agreed there were prominent injuries
 25 visible on Ms. Heard's face -- "I knew she did not have those

[Page 1030]

1 McMILLEN - WASS
 2 marks on her face on 24th May when I was with her"?
 3 A. That is correct.
 4 Q. Having seen the images of Ms. Heard on 21st May, those are the
 5 earlier ones that I showed you with the reddening, do you
 6 understand?
 7 A. I missed the last part of what you said.
 8 Q. Having seen the injuries of Ms. Heard ----
 9 MR. JUSTICE NICOL: The image ----
 10 MS. WASS: The images. There were several ----
 11 MR. JUSTICE NICOL: You said "injury"; I think you meant "image".
 12 MS. WASS: I did, my Lord, yes. Having seen the images of
 13 Ms. Heard earlier, not the last one, but the earlier ones,
 14 where you have identified a reddening of sorts, do you still
 15 maintain that there was nothing on her face on the 24th?
 16 A. When I saw her on the 24th, I noticed nothing but her
 17 beautiful skin.
 18 MR. JUSTICE NICOL: "I noticed nothing but", what?
 19 MR. SHERBORNE: "Her beautiful skin".
 20 MS. WASS: Could she have been wearing makeup on the day when you
 21 saw her on the 24th?
 22 A. She did not appear to be wearing makeup.
 23 Q. Ms. McMillen, I suggest you are being less than frank with the
 24 court about not seeing injuries on that date, and that you
 25 have come to this court to help Johnny Depp, who is a person

[Page 1031]

1 McMILLEN - WASS
2 who is very important to your career?
3 A. I have no reason to do that.
4 Q. Thank you very much ----
5 A. I am telling the truth.
6 Q. I think I have made it plain to you, Ms. McMillen, that
7 I dispute that. My Lord, those are my questions.
8 MR. JUSTICE NICOL: Yes, Mr. Sherborne.
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[Page 1032]

1 McMILLEN
2 RE-EXAMINED BY MR. SHERBORNE
3 MR. SHERBORNE: Ms. McMillen, can I just start by asking you a few
4 questions in relation to the December 2015 episode that
5 Ms. Wass asked you about?
6 A. Yes.
7 Q. I think Ms. Wass began by showing you some photos of what she
8 said were injuries that Ms. Heard sustained on 15th December.
9 Do you remember you were shown photographs?
10 A. Yes.
11 Q. Do you know when and how and in what circumstances those
12 photographs were taken?
13 A. I had no way of knowing that.
14 Q. Can I just take you to your witness statement. Do you still
15 have it in front of you, or to the side of you, I should say?
16 A. I can get it.
17 Q. Could you, yes. I think it is probably helpful to you. You
18 were asked about it a few times and challenged.
19 A. Where ----
20 Q. Sorry, it is file 2 and, I think, it is tab ----
21 MR. JUSTICE NICOL: 41.
22 THE WITNESS: Okay, I got it.
23 MR. SHERBORNE: Have you got that?
24 A. Yes, I do.
25 Q. And if you look there, you say in paragraph 5, "On 16th

[Page 1033]

1 McMILLEN - SHERBORNE
2 December, I spent much of the afternoon and early evening with
3 Ms. Heard." Do you see that?
4 A. Yes.
5 Q. "... preparing her to appear on the James Corden Show. I saw
6 her throughout the day of December 16th in good light, at
7 close range, and wearing no makeup."
8 A. Yes.
9 Q. "Throughout the day, I could see clearly that Ms. Heard did
10 not have any visible marks, bruises, cuts or injuries to her
11 face, or any other part of her body."
12 A. Correct.
13 Q. Ms. McMillen, if you had seen Ms. Heard's face looking like it
14 did in the photos you were shown, would you have given the
15 evidence you gave in that paragraph?
16 A. No, I would not.
17 Q. Having seen those photographs that you were shown, do you wish
18 in any way to change your evidence in that paragraph as to
19 what you saw on that day?
20 A. My memory on that day remains the same.
21 Q. Thank you. You were then shown by Ms. Wass some text messages
22 of what Ms. Heard said to a few of her close friends and,
23 I think, to her mother. Did you see anything in those text
24 messages of what Ms. Heard told other people that she said
25 happened to her, did you see anything in those text messages

[Page 1034]

1 McMILLEN - SHERBORNE
2 which caused you to change your evidence in paragraph 5?
3 A. No, I did not.
4 Q. You were asked about your conversation with Ms. Heard that you
5 referred to, the conversation that happened after she came off
6 filming, and you said that she said to you, "Can you believe
7 I just did that show with two black eyes?"
8 A. Yes.
9 Q. Can you explain, was that statement made -- I think you said
10 you hugged her. Did you hug her before after statement,
11 during that statement or before that statement?
12 A. In my memory, she was sort of coming at me to give me a hug
13 during, you know, to say goodbye, and as she was walking
14 towards me, she said that.
15 MR. JUSTICE NICOL: Just a minute. (Pause)
16 MR. SHERBORNE: Sorry, I was waiting for your Lordship to finish.
17 MR. JUSTICE NICOL: I have finished.
18 MR. SHERBORNE: I am grateful. Ms. McMillen, in your statement,
19 you explain how, as she said that, you said -- sorry, that you
20 have said in your statement that although she said that to
21 you, she did not have any black eyes and had been visibly
22 uninjured throughout the day and at that moment. Has your
23 evidence on that changed at all?
24 A. No, it has not.
25 Q. You were then taken to a text between Ms. Heard and Jodi

[Page 1035]

1 McMILLEN - SHERBORNE
 2 Gottlieb. Jodi Gottlieb, as I understand it, is Ms. Heard's
 3 PR. Do you know that?
 4 A. Yes, she is her publicist.
 5 Q. She is her publicist. Not her assistant, as was suggested to
 6 you, but her publicist?
 7 A. Yes.
 8 Q. So, she was texting her publicist to tell her about the
 9 injuries she claims she suffered and then you were taken to
 10 texts between Ms. Heard and Nurse Burin. Do you remember?
 11 A. Yes.
 12 Q. Now, I am just going to ask you some questions. Nurse Burin,
 13 we know ----
 14 MR. JUSTICE NICOL: Can we remind ourselves as to which ----
 15 MR. SHERBORNE: Yes, it is file 4. You do not need to look it up.
 16 I am going to read out a sentence to you. It is file 4, tab
 17 139. We know that Ms. Heard called Miss Burin, or they were
 18 in contact with each other, maybe as a result of the text.
 19 MR. JUSTICE NICOL: Did you say 139?
 20 MR. SHERBORNE: 139. Maybe 139A -- no, 139. (To the witness) We
 21 know there was a conversation between them on the 16th, so the
 22 night of the James Corden show, or her appearance on the
 23 recording of the show, during that conversation, the nurse
 24 does not go to see Ms. Heard, but during that conversation
 25 Ms. Heard gives an account to Nurse Burin. But I am not

[Page 1036]

1 McMILLEN - SHERBORNE
 2 asking you about that, I am asking about when the nurse goes
 3 to see Ms. Heard the next day on the 17th, and she says this:
 4 "The client also states her head is bruised and she lost
 5 clumps of hair in the altercation. The registered nurse" --
 6 that is Nurse Burin -- "briefly looked at Ms. Heard's scalp
 7 but was unable to visualise the haematomas" -- that is the
 8 bruises -- "that client had described." So, the nurse goes to
 9 see Ms. Heard and does not see these bruises. Ms. McMillen,
 10 can you think of any reason why Nurse Burin, who did not see,
 11 says she did not see these bruises, would lie about not seeing
 12 those bruises?
 13 A. I cannot think of any reason that she would do that.
 14 Q. You were asked a number of questions about why Ms. Heard might
 15 have lied about this, might have lied about her injuries. Can
 16 you read minds, Ms. McMillen?
 17 MR. JUSTICE NICOL: Well, now, I think this is coming close to
 18 facetious, Mr. Sherborne.
 19 MR. SHERBORNE: Let me ask you this, then, Ms. McMillen. Did
 20 Ms. Heard confide in you about any of her medical or mental
 21 health conditions?
 22 THE WITNESS: No, she did not.
 23 Q. I am going to ask you about 24th May. Just taking you back to
 24 your witness statement, you say in paragraph 8 that you, five
 25 months later, on May 24th you interacted closely with

[Page 1037]

1 McMILLEN - SHERBORNE
 2 Ms. Heard in Mr. Depp's house in West Hollywood. Was this a
 3 planned -- sorry, I have just broken my own rule of not
 4 letting you answer a question.
 5 A. I was just agreeing with you.
 6 Q. Now, this meeting with Ms. Heard, which you describe as an
 7 encounter, was that something that was planned or by chance?
 8 A. It was by chance.
 9 Q. So, Ms. Heard had no idea, when you turned up on May 24th,
 10 that you were coming?
 11 A. I was there first.
 12 Q. Ah!
 13 MR. JUSTICE NICOL: Sorry, what did you say?
 14 MR. SHERBORNE: "I was there first".
 15 THE WITNESS: I was there first.
 16 Q. So, just to get this clear, Ms. McMillen, you are in
 17 Mr. Depp's house in West Hollywood and Ms. Heard turns up, she
 18 does not know you are going to be there, does she?
 19 A. No.
 20 Q. You say that when she turned up, not knowing you were going to
 21 be there, she was not wearing makeup, that is what you say, is
 22 it not, in paragraph 8?
 23 A. That is correct.
 24 Q. And without the benefit of makeup, you said that she had her
 25 usual beautiful skin?

[Page 1038]

1 McMILLEN - SHERBORNE
 2 A. That is correct.
 3 Q. You say in your statement: "There were no visible marks,
 4 bruises, cuts or injuries to her face, or any other part of
 5 her body." Having been shown a few photographs of what
 6 Ms. Heard has taken, on 21st May and I think you were shown
 7 27th May, do you want to change your evidence as to how you
 8 saw her in that chance encounter on the 24th at all?
 9 A. My memory remains the same; so, no.
 10 Q. You explain, to be fair to you, that you saw her during
 11 daylight hours?
 12 A. Yes.
 13 Q. Did you get a clear look at her?
 14 A. Yes. We were by the kitchen door, where the light was coming
 15 in.
 16 Q. Did she at any stage -- you say she gave you a hug and was
 17 crying, did she at any stage refer to the fact that she had
 18 any injuries on her?
 19 A. Nothing.
 20 Q. Did she tell you that she had been beaten up by Mr. Depp?
 21 A. She said nothing like that.
 22 Q. Ms. McMillen, I think it is only fair to you that I ask you
 23 two very brief questions about Ms. Heard 's evidence in
 24 response to your witness statement.
 25 A. Okay.

[Page 1039]

McMILLEN - SHERBORNE

Q. Ms. Heard has suggested ----

MR. JUSTICE NICOL: Mr. Sherborne, does this arise out of cross-examination?

MR. SHERBORNE: My Lord, it does not. Can I say this, and I understand why your Lordship says that, what I am very concerned about is -- bearing in mind Ms. Heard is not the defendant, so that makes this quite a difficult, or different situation -- is Ms. Heard will give the evidence, challenging what Ms. McMillen has said in her witness statement, without the benefit of Ms. McMillen being able to respond to it. That means that in cross-examination, we simply cannot challenge it.

MR. JUSTICE NICOL: Well, I wonder if the way round this is for me to ask Ms. Wass whether her decision not to cross-examine Ms. McMillen in relation to what you say is in Ms. Heard's fifth statement was deliberate or by oversight. Because if it was by oversight, the simplest thing may be for her to continue her cross-examination. If it was deliberate, it seems to me you are not entitled to re-examine.

MR. SHERBORNE: I understand why your Lordship says that, but then I hope one of the reasons why I ventilated it in this way is the consequences that flow, not for me as a result of that, but flow for Ms. Wass and the defendants in terms of what evidence they can adduce from Ms. Heard.

[Page 1041]

McMILLEN - SHERBORNE

right passage. I think it might be sensible if Mr. Sherborne and I worked out what it is he was talking about, because 70 on my copy is not what he has on his. Rather than fumbling around in court, it may be easier if we speak to each other and he tells me what it is that I should have put, and I can explain to him directly whether it is an oversight or not.

MR. JUSTICE NICOL: Well, is this something that I need to rise for?

MS. WASS: Please.

MR. SHERBORNE: My Lord, I would rather the way we deal with it is we provide them a schedule of the occasions on which this has happened and Ms. Wass can reflect on those. Because, as I say, this is not an isolated issue at all, and it is one that concerns us, because of exactly the reasons I have said, the cross-examination. It happened this morning with Ms. Roberts as well. It has been a feature that the claimant's witnesses have not been challenged in the way that Ms. Heard has sought to challenge in her witness statements in response. Therefore, this is something, as I say, that has a wider consequence, purely, than Ms. McMillen. I am happy to provide a schedule of those instances, so Ms. Wass can reflect on it overnight as to how she wants to deal with it. In my submission, it is not going to be something that can be dealt with while your Lordship rises for two minutes.

[Page 1040]

McMILLEN - SHERBORNE

MR. JUSTICE NICOL: Well, the evidence can be adduced as it is. The weight to be given to it, if a relevant witness has not been cross-examined, is something else. Anyway, let me ask Ms. Wass.

Ms. Wass, I have not looked at Ms. Heard's fifth witness statement, but I am doing it on the basis of what Mr. Sherborne is saying, that there were matters in that statement, he says, that were not the subject of your cross-examination. My question to you is whether that was a deliberate decision on your part, or oversight? Because if it was oversight, you may want to ask to continue your cross-examination.

MS. WASS: Yes. I would be most assisted by Mr. Sherborne telling me which paragraphs he is referring to.

MR. SHERBORNE: In the fifth witness statement, for example -- this has happened with a number of witnesses, it happened with Ms. Roberts as well.

MR. JUSTICE NICOL: Let us keep to Ms. McMillen. Ms. McMillen, stay on the video line, but this is a conversation that really does not immediately concern you. Yes.

THE WITNESS: Thank you.

MR. SHERBORNE: For example, in paragraph 70 of Ms. Heard's fifth witness statement, Samantha McMillen starts ----

MS. WASS: My Lord, I am looking, I am worried about finding the

[Page 1042]

McMILLEN - SHERBORNE

MR. JUSTICE NICOL: Well, we have Ms. McMillen here. It would be burdensome on Ms. McMillen to ask her to come back another day.

MR. SHERBORNE: My Lord, it is going to apply to Ms. Roberts as well. It is going to apply to a number of the witnesses. As I say, I would prefer to do it, rather than do it piecemeal, I am not convinced that Ms. Wass is going to want to cross-examine. It obviously is a matter for her, but there are things that have been deliberately not put, in my submission. The question ----

MR. JUSTICE NICOL: If it is deliberately not put, that may be one thing. If it is an oversight -- what I am going to do is just pause this re-examination for a moment and give Ms. Wass the opportunity to look back over Ms. Heard's fifth witness statement and see if there is anything that she, on reflection, feels that she ought to have put to Ms. McMillen.

MR. SHERBORNE: If your Lordship wishes to do so, yes.

MR. JUSTICE NICOL: Ms. McMillen, I am sorry that you have had to sit there while I have had this discussion with the barristers. The sequence of events is that you, like other witnesses, provide a witness statement, that witness statement does not need to be gone through in court because I, as the judge, can read the witness statement. The sequence, as you have then experienced, is that you are called on behalf of the

[36] (Pages 1039 to 1042)

[Page 1043]

1 McMILLEN - SHERBORNE
 2 claimant, the witness statement is confirmed by you, and you
 3 are then allowed to be cross-examined by the defendants'
 4 barrister, and that has happened. Mr. Sherborne, who
 5 represents the claimant, then has an opportunity to re-examine
 6 you, that is what we call it, which is confined to questions
 7 or issues that have arisen in the course of your
 8 cross-examination.
 9 A point has arisen as to whether Ms. Wass, for the
 10 defendants, by oversight, ought to have asked you other
 11 questions. I am giving her a short opportunity to reflect on
 12 whether that was the case and, if it was, to ask my permission
 13 to continue her cross-examination. She is going to do that,
 14 and I will hear any application that she wants to make.
 15 Ms. Wass?
 16 MS. WASS: I still would like an opportunity to understand what it
 17 is that Mr. ---
 18 MR. JUSTICE NICOL: Well now, Ms. Wass, I am afraid that I have
 19 already extended a certain amount of tolerance to you for what
 20 is a departure from the normal course, and I am not going to
 21 press Mr. Sherborne at this stage to do more. So, it is a
 22 matter for you to decide what it is you think you ought to be
 23 cross-examining on. I am giving you the opportunity, if you
 24 think that there has been an oversight.
 25 MS. WASS: Mr. Sherborne has referred to one matter in

[Page 1044]

1 McMILLEN - SHERBORNE
 2 paragraph 70. I have dealt with that, in my submission.
 3 MR. JUSTICE NICOL: All right. All I am seeking to do is to
 4 understand whether any decision not to ask further questions
 5 in cross-examination was deliberate or oversight. If it was a
 6 deliberate decision ---
 7 MS. WASS: My Lord has put forward two alternatives, whether it
 8 was deliberate, whether it was oversight. I say I have
 9 covered it.
 10 MR. JUSTICE NICOL: If that is a matter, that can then be argued
 11 out at a later stage.
 12 MS. WASS: Exactly. I do not ask for, in the absence ---
 13 MR. JUSTICE NICOL: You do not want to ask any further
 14 cross-examination.
 15 MS. WASS: Having considered Ms. Heard's fifth witness statement,
 16 I do not consider that there is any matter that I have left
 17 out which I ought to have covered.
 18 MR. JUSTICE NICOL: All right. Then, Mr. Sherborne, there we are.
 19 You are confined to matters that arose in cross-examination.
 20 MR. SHERBORNE: My Lord, can I just ask, I forgot to ask
 21 Ms. McMillen to look at a photograph. It is file 9, and it is
 22 tab J87N, quite a mouthful. Hopefully you can find it.
 23 THE WITNESS: I have found it.
 24 MR. SHERBORNE: What we see on J, I think it is J1.13.
 25 MR. JUSTICE NICOL: Just a minute. (Pause) Yes.

[Page 1045]

1 McMILLEN - SHERBORNE
 2 MR. SHERBORNE: What we see on J1.13, is that Ms. Heard at the
 3 filming of the Late Late Show with James Corden?
 4 THE WITNESS: Yes, it is.
 5 MR. JUSTICE NICOL: Just a minute, please.
 6 MR. SHERBORNE: If you just wait a second, Ms. McMillen, his
 7 Lordship needs to find the right page. It is tab 87N.
 8 MR. JUSTICE NICOL: Yes.
 9 MR. SHERBORNE: And then, does your Lordship have J1.13?
 10 MR. JUSTICE NICOL: I do.
 11 MR. SHERBORNE: You can see Ms. Heard's mouth and her face. Then,
 12 if you turn over the page, her mouth is fairly wide open on
 13 J1.13. Then J1.14, if you turn over the page, again.
 14 THE WITNESS: Yes.
 15 Q. And how would you describe Ms. Heard's face and complexion
 16 there, Ms. McMillen?
 17 A. It looks normal and beautiful to me.
 18 Q. Is that how you remember it, or is it different?
 19 A. That is how I remember her looking, once her makeup was done.
 20 Q. And you said, you saw her before her makeup was done?
 21 A. Yes.
 22 Q. Finally this, Ms. McMillen, you were asked whether or not, if
 23 you had a conflict of loyalty between Mr. Depp, your loyalty
 24 to Mr. Depp, or your loyalty to Ms. Heard, which would win.
 25 Can I ask you a different question.

[Page 1046]

1 McMILLEN - SHERBORNE
 2 A. Yes.
 3 Q. Where there was a conflict between your loyalty to Mr. Depp
 4 and you having to lie to this court, which would win?
 5 A. I would not commit perjury for any reason for anyone, friends
 6 or family or anyone.
 7 MR. SHERBORNE: Thank you very much, Ms. McMillen. I have no
 8 further questions.
 9 THE WITNESS: Thank you.
 10 MR. JUSTICE NICOL: Ms. McMillen, that completes your evidence.
 11 Can I repeat what I said at the beginning, and thank you for
 12 coming to give your evidence for this trial. You may now
 13 leave the room. You are free to go. Thank you very much.
 14 THE WITNESS: Thank you.
 15 (The witness withdrew)
 16 MR. SHERBORNE: I do not know whether your Lordship wants to rise
 17 before the next witness.
 18 MR. JUSTICE NICOL: Yes.
 19 MR. SHERBORNE: For five minutes.
 20 MR. JUSTICE NICOL: This is Ms. Vargas.
 21 MR. SHERBORNE: Yes.
 22 MR. JUSTICE NICOL: With the translator.
 23 MR. SHERBORNE: Yes.
 24 MR. JUSTICE NICOL: All right.
 25 (A short break)

[Page 1047]

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2 MR. SHERBORNE: My Lord, can I call our next witness, Hilda

3 Vargas.

4 MR. JUSTICE NICOL: Yes. I think Ms. Vargas wants to give

5 evidence through an interpreter; is that right?

6 MR. SHERBORNE: My Lord, yes. As I understand it, yes.

7 MR. JUSTICE NICOL: Then the interpreter should be sworn first.

8 (The interpreter was affirmed)

9 MR. JUSTICE NICOL: Thank you very much. I am sorry I did not

10 catch your name, Mr. Interpreter.

11 THE INTERPRETER: Jose I Garcia.

12 MR. JUSTICE NICOL: Thank you, Mr. Garcia. Would you now assist

13 Ms. Vargas in her oath or affirmation.

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[Page 1048]

1 VARGAS

2 MS. HILDA VARGAS, SWORN

3 EXAMINED BY MR. SHERBORNE

4 (Evidence given via video link and through an interpreter)

5 MR. JUSTICE NICOL: Thank you. Ms. Vargas, you can sit down. You

6 are going to be asked some questions first by Mr. Sherborne,

7 who represents Mr. Depp. Yes, Mr. Sherborne.

8 END 0S BRENDA

9 SHER: MS. VARGAS, GOOD MORNING. THE WITNESS: GOOD

10 MORNING....

11 **PLEASE CHECK HEADERS -- I'M GETTING A HEADACHE!! **

12

13 START 0T LINDA.

14 MR. SHERBORNE: Ms. Vargas, good morning.

15 A. Good morning.

16 Q. I will stick to English, if I may. Ms. Vargas, can you look

17 to your left where you will find a large number of files.

18 File number 2 is the one that we need you to take out. Can

19 you turn, please, to the tab divider number 51? 51.

20 A. It is here.

21 Q. Can you -- sorry, Mr. Garcia?

22 A. Okay, I am ready.

23 Q. Do you see there, Ms. Vargas, your witness statement?

24 A. Yes.

25 Q. Can you turn then three pages on?

[Page 1049]

1 VARGAS - SHERBORNE

2 A. Yes.

3 Q. Do you find there a document which has a page number at the

4 bottom, D157, D for Domingo?

5 A. Yes, I have it.

6 Q. Thank you. Can you see there a signature?

7 A. Yes sir.

8 Q. Is that your signature, Ms. Vargas?

9 A. Yes, sir.

10 Q. Just one last question from me, Ms. Vargas. Can you confirm

11 that your witness statement is true?

12 A. Yes, sir.

13 Q. Thank you. If you just wait there, you will be asked some

14 questions by Ms. Wass for the defendants.

15 A. Yes, sir.

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[Page 1050]

1 VARGAS

2 CROSS-EXAMINED BY MS. WASS

3 MS. WASS: Ms. Vargas, you have been employed by Mr. Johnny Depp

4 for 30 years?

5 A. Yes, ma'am.

6 Q. As a cleaner, is that right; housekeeper?

7 A. Yes, ma'am.

8 Q. And in or around the beginning of 2016, was it your routine to

9 clean in the morning at his house in West Hollywood, Sweetzer

10 Avenue?

11 A. Yes, ma'am.

12 Q. And then in the afternoons, you would go to the Eastern

13 Columbia Building where he owned a series of penthouse flats?

14 A. Yes, ma'am.

15 Q. That is a routine that you would not deviate from?

16 A. No, ma'am.

17 Q. (To the interpreter) Does Ms. Vargas agree with me that that

18 was her strict routine?

19 A. Yes, ma'am.

20 Q. Thank you very much. So, Mr. Depp would know the time of day

21 when you would attend the Eastern Columbia Building to do the

22 housekeeping?

23 A. Yes, ma'am.

24 Q. Now, on 22nd April 2016, you attended the Eastern Columbia

25 Building in the afternoon, as was your routine?

[Page 1051]

[Page 1053]

VARGAS - WASS

VARGAS - WASS

1
2 A. Yes, ma'am.
3 Q. And there was nobody at the house; nobody at the flat, I am
4 sorry?
5 A. No, there was nobody.
6 Q. Had you seen Mr. Depp earlier that day at the Sweetzer Avenue
7 house?
8 A. I do not recall.
9 Q. All right, it is a long time ago. In your statement that you
10 made, you said that on the upstairs level of PH3, which was
11 where Mr. Depp slept with Ms. Heard ----
12 A. Yes, ma'am.
13 Q. ---- the premises were extremely messy. These are your words.
14 A. Yes, the master bedroom.
15 Q. Yes, much more messy than you had seen it before; do you
16 agree?
17 A. Yes, ma'am.
18 Q. There were things that had been knocked over?
19 A. Yes, ma'am.
20 Q. There was some broken glass on the floor?
21 A. Yes, ma'am.
22 Q. And I think you said that the place was the worst that you had
23 seen it; is that right?
24 THE INTERPRETER: Can I have the question repeated, please?
25 MS. WASS: I think I have actually covered this, my Lord, unless

1
2 Q. On the floor. You had never known either dog to defecate in
3 the bed, had you?
4 A. No, never.
5 Q. Because they were so small, they could not jump on to the bed
6 on their own?
7 A. No, ma'am.
8 Q. You agree, you agree with that, they could not jump on to the
9 bed?
10 A. Yes.
11 Q. The only way they could be in the bed is if they were lifted
12 up and put on the bed?
13 A. Yes, ma'am.
14 Q. Because you had never seen the dogs or had no experience of
15 the dogs defecating in the bed, you formed the view that it
16 was human faeces that was in the bed?
17 A. Yes, because of its size.
18 Q. Yes, so the size and the place that the faeces were found,
19 namely, in a bed where the dogs could only access the bed by
20 being lifted up, those were the two features that caused you
21 to form your opinion?
22 A. Yes, ma'am.
23 Q. Now, did you know that Ms. Heard was away at the time?
24 A. The lady was not.
25 Q. The lady was not away? I think we might be at cross-purposes.

[Page 1052]

[Page 1054]

VARGAS - WASS

VARGAS - WASS

1
2 my Lord wants it repeated.
3 MR. JUSTICE NICOL: No.
4 MS. WASS: (To the witness) were you aware of where Mr. Depp was at
5 that stage?
6 A. I do not know.
7 Q. All right. There came a time when somebody pointed out to you
8 that there was a pile of faeces in the bed?
9 A. Yes, ma'am.
10 Q. And you were understandably horrified and disgusted?
11 A. Yes, ma'am.
12 Q. Now, Mr. Depp and Ms. Heard had two small dogs, did they not?
13 A. Yes, ma'am.
14 Q. One smaller than the other one?
15 A. Yes, ma'am.
16 Q. I think the smaller dog was called Pistol?
17 THE INTERPRETER: I did not hear the last word.
18 MR. JUSTICE NICOL: Just repeat the question.
19 MS. WASS: Sorry, the smaller dog was called Pistol?
20 A. Yes, ma'am.
21 Q. And the larger dog was called Boo?
22 A. Yes, ma'am.
23 Q. And Boo had had a number of accidents in terms of soiling the
24 flat; do you agree?
25 A. On the floor.

1
2 A. She was not at the home.
3 Q. I think we agree, she was away from home at a music festival?
4 A. Away from home. Only the cleaners were there.
5 Q. I understand and we agree with that. Did you know that
6 Ms. Heard was away from the home for more than the day?
7 A. The lady, I mean, that day was a Friday.
8 Q. Yes.
9 A. We had arrived at around 3 p.m.
10 Q. 3 p.m.?
11 A. Those faeces were fresh, I mean, like from the night, or from
12 the early morning.
13 Q. I think you were angry, having found the faeces in the bed?
14 A. Yes, ma'am.
15 Q. And it was your view, no doubt, that this was way beyond the
16 duties that you were expected to perform?
17 A. A lack of respect.
18 Q. Exactly, a lack of respect and you reported the matter to
19 Kevin Murphy?
20 A. Yes, ma'am.
21 Q. Was Kevin Murphy effectively your line manager? Was he the
22 person to whom you raised problems, if there were problems?
23 A. Yes, ma'am.
24 Q. Yes. You took photographs of the faeces to prove to him that
25 this had happened and to obviously justify why you felt that

[39] (Pages 1051 to 1054)

[Page 1055]

1 VARGAS - WASS
 2 you were entitled to be angry; do you agree?
 3 A. Yes, ma'am. After so many years working for this family,
 4 I have never cleaned up that type of thing.
 5 Q. As far as Ms. Heard was concerned, would you confirm that she
 6 was somebody who had very good personal hygiene?
 7 A. The regular thing of any individual at home.
 8 MR. JUSTICE NICOL: I am sorry, I did not catch the answer.
 9 A. The regular thing of any individual at home.
 10 MS. WASS: I am not sure I understand, Ms. Vargas. What I am
 11 suggesting to you is that Miss Amber Heard was a very clean
 12 person. She kept herself clean? What do you say?
 13 A. An ordinary individual.
 14 Q. Yes. She had good personal hygiene, better personal hygiene
 15 than Mr. Depp, I suggest.
 16 A. That I could not confirm.
 17 Q. You spent a lot of time conversing with Ms. Heard, who
 18 actually spoke fluent Spanish, did she not?
 19 THE INTERPRETER: I did not hear the question.
 20 MS. WASS: I am suggesting that Ms. Vargas spent a lot of time
 21 talking to Ms. Heard, who spoke fluent Spanish.
 22 A. We would converse very little.
 23 Q. Did you converse in Spanish?
 24 A. Yes, ma'am.
 25 Q. Yes, all right. Thank you for that. Now, on 24th May, in the

[Page 1056]

1 VARGAS - WASS
 2 morning, you were at Mr. Depp's West Hollywood home?
 3 A. Yes, ma'am.
 4 Q. Ms. Heard came over to that property with her friend, Raquel
 5 Pennington?
 6 A. Yes, ma'am.
 7 Q. Raquel Pennington lived in one of the penthouses in the
 8 Eastern Columbia Building, did she not?
 9 A. Yes, ma'am.
 10 Q. I think you were surprised to see Ms. Heard in the West
 11 Hollywood home, the Sweetzer Avenue home, because she had not
 12 been there for several weeks?
 13 A. Yes, ma'am.
 14 Q. And Ms. Heard did not really live there. Her home was the
 15 Eastern Columbia Building, the Penthouse 3 flat?
 16 A. Yes, ma'am.
 17 Q. In early 2016, Mr. Depp was spending more time at the
 18 Hollywood house at Sweetzer Avenue?
 19 A. I do not understand the question.
 20 Q. What I am suggesting is that in the first few months of 2016,
 21 Mr. Depp would spend most of the time he was in the United
 22 States at the Sweetzer Avenue property and would sleep there,
 23 and Ms. Heard would use the Eastern Columbia Building, so they
 24 were separate a lot of the time?
 25 A. No, ma'am.

[Page 1057]

1 VARGAS - WASS
 2 Q. Are you suggesting that they always were together at night in
 3 2016?
 4 A. No, he was separated from her in April. In April, I do not
 5 recall the date, but it was not the whole month of April.
 6 Q. I am going to suggest that from the beginning of 2016, they
 7 were apart a lot.
 8 A. That I do not know, madam.
 9 Q. All right, but on 24th May, she came to the Sweetzer Avenue
 10 house?
 11 MR. JUSTICE NICOL: Sorry, she is?
 12 MS. WASS: Ms. Heard came to the Sweetzer Avenue house.
 13 MR. JUSTICE NICOL: The question is, on 24th May, did Ms. Heard
 14 come to the Sweetzer Avenue house?
 15 A. Yes, sir.
 16 MS. WASS: And you have said in your witness statements this: "I
 17 saw no bruises or marks on her face of any kind. She did not
 18 appear to be wearing any makeup."
 19 A. She did not have any marks on her face.
 20 Q. Yes. How are you so sure that she was not wearing makeup,
 21 Ms. Vargas?
 22 A. Her face was very clean, very pale.
 23 Q. You see, this was not a property where Ms. Heard was sleeping
 24 each night, Sweetzer Avenue, was it?
 25 A. No, she arrived at the Sweetzer Avenue home in West Hollywood.

[Page 1058]

1 VARGAS - WASS
 2 Q. She was not staying there at the time. I think you have
 3 already confirmed you had not seen her for several weeks
 4 there.
 5 A. Yes, ma'am.
 6 Q. You know, Ms. Vargas, that Ms. Heard is an actress?
 7 A. Yes, ma'am.
 8 Q. And she is a well-known actress who is regularly photographed
 9 when she leaves her house or her flat?
 10 A. That I do not know, madam.
 11 Q. I am going to suggest that she never left her home barefaced;
 12 she always had some makeup on?
 13 A. She was not wearing makeup on that day.
 14 Q. Have you been asked to put that into your statement?
 15 THE INTERPRETER: I did not hear the question.
 16 MS. WASS: I am asking Ms. Vargas if she was asked, if there was a
 17 request that she put a detail in her statement that Ms. Heard
 18 was not wearing makeup?
 19 A. Nobody requested anything from me.
 20 Q. How close were you to Ms. Heard on 24th May?
 21 A. As close as I am from you.
 22 Q. From you, Mr. Interpreter, to Mrs. Vargas; yes?
 23 A. Yes, ma'am.
 24 Q. Did you have a lot of contact with her that day?
 25 A. She called me into the sitting room because she wanted to talk

[Page 1059]

1 VARGAS - WASS
 2 to me about the photographs.
 3 Q. She was upset that those photographs, she was upset that
 4 faeces -- she was upset that faeces had been left in the bed
 5 or that you had found faeces?
 6 A. Yes, ma'am. I know she was upset at the photographs.
 7 Q. She was upset that you had to deal with such a thing because,
 8 as you have said, it was a sign of lack of respect for you?
 9 A. Yes, I told her.
 10 Q. Did she express sympathy that you had been put in that
 11 position?
 12 A. No.
 13 Q. I think you have said at the end of your statement that you
 14 often heard Ms. Heard yell at Mr. Depp and other people?
 15 A. Yes, ma'am, I heard it.
 16 Q. And you said she has a bad temper?
 17 A. In my opinion.
 18 Q. And what had she ever done to you that was bad-tempered,
 19 Mrs. Vargas?
 20 MR. JUSTICE NICOL: Ms. Wass -- just a minute, please,
 21 Mr. Interpreter. Ms. Wass, I am looking at the time.
 22 MS. WASS: Yes.
 23 MR. JUSTICE NICOL: I want this cross-examination to end quite
 24 soon.
 25 MS. WASS: My Lord, it will, but may I simply put down a marker,

[Page 1060]

1 VARGAS - WASS
 2 I am being criticised from my left for not putting the case as
 3 fully as Mr. Sherborne ----
 4 MR. JUSTICE NICOL: I realise that, but I said also yesterday we
 5 must not make it a habit to go well beyond 4.30.
 6 MS. WASS: All right. My Lord, the difficulty is, I would want
 7 some detail of this sweeping allegation, and the only way to
 8 ask for it -- I can comment in due course and evidence can be
 9 given in due course, but if I am to put my case in a way that
 10 is full, it will take a little time. On the other hand, I am
 11 more than content to curtail the cross-examination and finish
 12 now, but I will not be criticised by Mr. Sherborne for not
 13 putting things in as much detail as he suggests I ought to
 14 have done, when it is the court who is ----
 15 MR. JUSTICE NICOL: It is the court, but it is also counsel's
 16 responsibility to observe time limits.
 17 MS. WASS: Well, what I will do, then, is simply deal with another
 18 matter and conclude my cross-examination and, in due course,
 19 if there is to be submissions about this matter, then I will
 20 make them at that stage.
 21 MR. JUSTICE NICOL: Right.
 22 MS. WASS: Ms. Vargas, my last question is this. You have said
 23 you have never seen Mr. Depp be physical with or yell at
 24 anyone?
 25 THE WITNESS: Never. In the years I have been working for him,

[Page 1061]

1 VARGAS - WASS
 2 not at all.
 3 Q. You have never seen him shout?
 4 A. I will not make any comment in that regard.
 5 Q. I am asking you to make a comment. Has he shouted, have you
 6 seen him shouting, have you heard him shouting?
 7 A. No.
 8 Q. You have not seen him shouting. Have you seen him kick
 9 objects?
 10 A. Never.
 11 Q. Have you seen him punch objects?
 12 A. No.
 13 Q. Have you seen him smash glass?
 14 A. No.
 15 Q. Have you ever seen him drunk?
 16 A. I do not want to make any comments in that regard.
 17 Q. I am asking you to answer my question, please, Ms. Vargas,
 18 have you seen Mr. Depp drunk?
 19 A. I have seen him drinking a cup of wine, but I have not seen
 20 him drunk.
 21 Q. Have you ever seen him under the influence of drugs,
 22 controlled, illegal drugs?
 23 THE INTERPRETER: May I have the question again, please?
 24 MS. WASS: Have you ever seen him under the influence of illegal
 25 drugs?

[Page 1062]

1 VARGAS - WASS
 2 THE WITNESS: No.
 3 Q. The position is, Mrs. Vargas, you have simply come to the
 4 court to support and give a character reference for Mr. Depp,
 5 which is untrue?
 6 A. I have a work schedule, I do not spend all the time with him.
 7 Q. But you worked for him for 30 years and you are giving
 8 evidence to support him?
 9 A. As I am saying, I have a work schedule. I do not spend all
 10 the nights with him.
 11 MS. WASS: Thank you very much for answering my questions,
 12 Mrs. Vargas.
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[Page 1063]

[Page 1065]

1 VARGAS
2 RE-EXAMINED BY MR. SHERBORNE
3 Q. Ms. Vargas, just a few questions for you.
4 A. Yes, sir.
5 Q. You have told the court that you knew perfectly well that the
6 faeces you found on the bed did not come from those two
7 miniature dogs?
8 MS. WASS: My Lord, that is not the evidence. She said she,
9 because of the two features, the size and the fact that the
10 dogs did not go on the bed, that is what she believed.
11 MR. JUSTICE NICOL: Just a minute, please, Mr. Sherborne. Just a
12 minute, Mr. Interpreter. I am going to let Mr. Sherborne ask
13 this question.
14 MR. SHERBORNE: I am going to show you your witness statement,
15 because that is your evidence in this case. So, paragraph 7
16 of your statement, Ms. Vargas.
17 THE WITNESS: Yes.
18 Q. You say this, five lines down in paragraph 7: "I pulled back
19 the top sheet on the bed and saw a large pile of faeces.
20 I was horrified and disgusted. It was clear to me that this
21 was human faeces. I knew that the faeces could not have come
22 from either of Mr. Depp's and Ms. Heard's two small dogs."
23 A. Yes, sir.
24 Q. "I have cleaned up after those dogs many times".
25 A. Yes, sir.

1 VARGAS - SHERBORNE
2 A. No.
3 Q. Did you see any bruise, any mark, any injury?
4 A. No, never; I did not see anything.
5 Q. Can I then ask you one last question. It has been suggested
6 to you, Ms. Vargas, that you have been asked by Mr. Depp to
7 come to court and to lie on oath.
8 A. No.
9 Q. What do you have to say about that, Ms. Vargas?
10 A. I do not know why, I do not understand.
11 MR. SHERBORNE: Thank you, Ms. Vargas. I have no further
12 questions.
13 THE WITNESS: Thank you.
14 MR. JUSTICE NICOL: Ms. Vargas, and Mr. Garcia, that concludes
15 your evidence. Can I thank you both for coming along to give
16 evidence in this trial. Thank you both very much indeed. We
17 will now terminate the link.
18 THE WITNESS: Thank you very much.
19 (The witness withdrew)
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[Page 1064]

[Page 1066]

1 VARGAS - SHERBORNE
2 Q. "And their faeces are much smaller"?
3 A. Yes, sir.
4 Q. "Further, I have never known those dogs to defecate in the
5 bed"?
6 A. Yes, sir.
7 Q. You were asked questions by Ms. Wass about whether those
8 statements were true or not.
9 A. Yes, they are true, sir.
10 Q. Does that remain your evidence?
11 A. Yes, it is my evidence.
12 Q. Can I then ask you about 24th May?
13 A. Yes, sir.
14 Q. When Ms. Heard asked you to go into the living room to have a
15 conversation with her, did you have a conversation with her
16 face to face or was she away from you, turned away; how was
17 the conversation?
18 A. Face to face.
19 Q. You told us that she was as far as away from you as Mr. Garcia
20 is?
21 A. That is the distance.
22 Q. Throughout the conversation, did you or did you not have a
23 clear look at her face?
24 A. Yes, I could see her face.
25 Q. Was she wearing makeup or not?

1 DISCUSSION
2 MS. WASS: My Lord, may I flag up a very short matter before
3 your Lordship rises. At the time when there was a discussion
4 about whether I ought to have put something to the witness
5 this afternoon, Mr. Sherborne indicated that he would be able
6 to provide a schedule of matters I had not put. I am asking
7 your Lordship to order that schedule is prepared, because if
8 there are to be criticisms I want to be aware of them before
9 the closing address by the claimant, which is the last address
10 that will take place.
11 MR. JUSTICE NICOL: Well, Ms. Wass, if Mr. Sherborne chooses to
12 provide that, that is perhaps helpful, but I am not sure that
13 it falls to me to order him to provide that.
14 MS. WASS: My Lord, the request has been made, and if criticism is
15 made at a stage when I would not normally have an opportunity
16 of dealing with it, I may wish the court's leave to address
17 the court on that.
18 MR. JUSTICE NICOL: If that is the case, you can make whatever
19 application you wish. Mr. Sherborne?
20 MR. SHERBORNE: My Lord, yes.
21 MR. JUSTICE NICOL: It might be helpful for Ms. Wass to understand
22 what points you think have not been put to the witnesses. You
23 have heard me say that I am not inclined to order you to do
24 so, but it may assist the ultimate process that I have to make
25 a decision about.

[42] (Pages 1063 to 1066)

[Page 1067]

DISCUSSION

1
2 MR. SHERBORNE: I hear what your Lordship says. Ms. Wass is an
3 experienced advocate, it is quite clear she has chosen, from
4 the debate before you in relation to Ms. McMillen, it is clear
5 she has chosen to take a deliberate course. I will consider,
6 but Ms. Wass knows what she is doing, I am sure.
7 MR. JUSTICE NICOL: All right.
8 MR. SHERBORNE: I think that completes everything. There was one
9 point outstanding but I am very conscious ----
10 MR. JUSTICE NICOL: We are not going to deal with it now.
11 MR. SHERBORNE: That is what I was going to say. I am very
12 conscious of trespassing on the court staff as well as
13 your Lordship. I will talk to Ms. Wass about it. If it needs
14 to be ventilated in the morning, I am sure the morning is the
15 best time to ventilate it.
16 MR. JUSTICE NICOL: We have sat a little later this evening. You
17 have both heard what I have had to say in putting down gentle
18 markers, but the markers are going to become rather less
19 gentle as we progress.
20 MR. SHERBORNE: Can I say that obviously the time it takes has
21 been almost, if not entirely, dictated by cross-examination.
22 I just want to say this.
23 MR. JUSTICE NICOL: Mr. Sherborne, I am not allocating blame.
24 I am simply making an observation.
25 MR. SHERBORNE: I understand that.

[Page 1068]

DISCUSSION

1
2 MR. JUSTICE NICOL: The markers will become less gentle.
3 MR. SHERBORNE: I understand entirely. I am saying this for the
4 benefit of those, when we come to cross-examine defendants'
5 witnesses and I do think therefore -- I am sure Ms. Wass will
6 give some reconsideration to the times that have been
7 allocated. That is all I was going to say, because that is
8 all we can do. I understand that your Lordship is not seeking
9 to curtail things, it is to make sure we do not sit later than
10 what is normal day in and day out, as appears to be the case
11 at the moment.
12 MR. JUSTICE NICOL: Very well. 10 o'clock tomorrow.
13 (Adjourned till 10 a.m. tomorrow morning)
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[43] (Pages 1067 to 1068)

A	920:25 921:8	992:8	968:2,16,18	904:18	917:11
a.m 1007:13	948:20	admired	987:5,5	905:14	984:15
1068:13	account 904:19	912:14	998:21 999:6	allocated	1043:19
able 904:19	905:18 934:3	adopt 956:4	999:23	1068:7	amounted
916:16 933:8	934:16,20	adults 961:14	1000:16,25	allocating	924:23
963:20,21,21	951:7 1010:8	advance 902:7	1002:15,24	1067:23	amounts 979:8
963:23 965:3	1010:9	Advil 1022:6	1003:2,7	allocation	and- 0:10
984:15 985:4	1035:25	advocate	1011:22	992:6	and/or 983:13
985:21 986:3	accountant	1067:3	1014:17	allow 905:18	Angeles 952:3
987:3 990:25	984:17	affirm 957:11	1015:19,20	906:10	976:4 995:15
1019:21	accounts	957:16	1020:15	940:12	996:17
1022:9	905:21 980:3	994:18	1029:19	987:24	anger 939:24
1025:4,11,14	985:2,8	affirmation	1050:17	allowed 982:5	1023:17
1027:3	accrued 979:15	994:20,22	1051:16	1043:3	angry 945:12
1028:6	accused 1010:3	1047:13	1052:24	altercation	945:15,18,19
1029:4	acting 980:19	affirmed 995:2	1053:8,8	1036:5	1054:13
1039:11	990:10,12	1047:8	1054:3,5	alternative	1055:2
1066:5	action 934:17	afforded 909:6	1055:2	974:20	annoying
absence 979:18	actress 1058:6	afraid 934:11	agreed 979:19	1025:19	940:10
1044:12	1058:8	987:13 993:8	990:8	alternatives	answer 907:6
absent 985:9	actual 916:22	1043:18	1029:24	1044:7	909:13
987:4 988:7	992:19	afternoon	agreeing	Amazing 940:7	919:13
absolutely	1002:17	976:8 991:21	1037:5	Amber 909:6,6	920:20
918:13	ADAM 0:19	993:5	agreement	911:9,12,13	929:21 942:5
925:19,20	add 946:11	1003:11	979:19 991:3	911:24	946:5 957:15
954:17 968:9	added 984:15	1033:2	1014:19	920:15	958:20 978:2
1013:17	additional	1050:25	Ah 1006:2	925:10	978:10 982:2
1023:11	903:25	1066:5	1008:8	930:23	995:20
abuser 948:16	904:11	afternoons	1012:20,22	931:12 932:6	999:14
accept 928:17	977:16	1050:12	1014:17	953:20 963:9	1001:20
988:15	address 911:15	agenda 976:17	1037:12	963:15 973:7	1002:10
1009:24	929:2 977:11	983:12	ahead 936:14	973:9,15,16	1006:10
1010:9	1066:9,9,16	aggressive	939:4 957:8	998:20,21	1010:24
accepting	addressing	963:9,15	1001:5	1006:2,25	1011:10,13
922:21	976:11	972:17 973:7	albeit 954:14	1007:11,16	1013:10
access 0:22	adduce 982:16	973:8,14,16	982:6	1007:24	1018:5,21
970:12	986:8	ago 913:21,24	alcohol 917:11	1011:19	1019:6
1053:19	1039:25	946:16	Alice 996:19	1013:15	1022:12
accident	adduced	954:12	allegation	1014:6,17	1025:9
1019:16	986:14	1003:20	901:19	1023:6	1037:4
accidents	1040:2	1051:9	902:24 903:4	1024:4,9,19	1055:8
1052:23	adjectives	agree 910:9,10	905:11,23	1055:11	1061:17
accommodat...	984:9	912:15 913:4	979:23	ambitious	answered
962:24	Adjourned	915:13	1010:21	989:9	946:22
accommodat...	993:21	922:20 930:8	1060:7	ambush 902:15	answering
975:18	1068:13	931:13 932:5	allegations	American	900:10
accommodat...	adjournment	932:17	902:10 903:6	986:5	958:17
962:12	906:13 992:4	938:16,17	903:25,25	amicably	1062:11
accordion	992:19	939:18	905:8	911:22	answers
	administrative	965:13,17	alleged 904:15	amount 913:25	901:25

anticipate	929:15	905:7 938:16	1066:6	929:18	980:14
904:23	933:23	943:10,15	asleep 939:23	audio 933:19	1005:4
986:11	April 1050:24	Asian 908:6	aspect 967:25	933:20 969:7	1009:15,25
anticipated	1057:4,4,5	943:22	968:4 987:19	August 965:21	1013:3,12
990:20	area 963:3	asked 903:14	987:23	979:11	1022:13
anxiety	1021:9	905:14 913:4	aspirin 923:6	Australia	1023:23
1005:20	argued	913:22,24	assault 973:21	915:13	1028:5,25
anybody	1044:10	920:17 942:4	assist 905:24	918:13 944:9	1036:23
935:19,22	argument	942:6 943:16	976:14	944:22 945:6	1042:3,15
Anyway	906:3 907:17	944:10 945:9	1047:12	952:2,3	1063:18
943:14	907:19,20	958:5 973:24	1066:24	Australian	backwards
1040:4	916:13,17	974:21	assistance	933:10,11	1002:22
apart 1057:7	968:13,14,17	976:20	986:22	authorship	bad 907:14
apologise	arguments	977:25 978:4	assistant	1014:2	939:23
946:25	912:20	978:7,9,23	1019:20	available 957:8	1019:16
appear 917:9	arisen 901:21	982:22	1035:5	976:10	1059:16
918:2,3,16	1043:7,9	986:12	assistants	992:22	bad-tempered
967:25	arises 906:17	990:24	1019:13	Avenue	1059:18
1003:16,23	Arizona	994:18 995:6	assisted	1050:10	badly 911:23
1005:11	961:11	999:4,8,21	1040:14	1051:6	bag 984:12
1030:22	arm 930:12,18	1013:6	associate	1056:11,18	Bahamas
1033:5	930:25	1023:16	1027:19	1056:22	956:5 962:21
1057:18	arms 925:12,13	1028:3	Association	1057:9,12,14	964:18
appearance	925:15,17,24	1032:5,18	977:7 991:22	1057:24,25	974:22,23,25
1020:14	arose 934:22	1034:4	992:20 993:3	avenues 992:12	bare 925:12,13
1035:22	942:20	1036:14	Association's	avoid 995:19	barefaced
appeared 0:18	977:24	1043:10	992:23	avoidance	1058:11
0:19 903:2	1044:19	1045:22	attached	1002:20	barely 1027:4
931:12	arrange 966:6	1048:6	912:17	aware 933:21	1027:5
appears 922:20	arrival 939:20	1049:13	1015:4	968:5 996:17	barrister
938:12 965:4	arrived 914:19	1058:14,16	1023:7,24	1052:4	913:12
979:6 980:18	914:21	1064:7,14	1024:24	1066:8	1043:4
1068:10	916:13 923:3	1065:6	1025:6,12	awkward	barristers
application	923:14,14	asking 926:22	attachment	927:3	1042:21
902:9,14	928:19,20,21	930:16,17	1015:9	<hr/>	based 982:12
977:7,9,15	928:24 930:2	949:3 980:2,3	attachments	B	998:13
981:5 987:9	938:22 946:7	980:10	1005:8	B 950:8 991:21	basically
991:21,23	946:17 948:6	984:25 985:2	1015:7	992:18	933:14,23
1043:14	948:11	985:16	attack 953:24	1004:16,17	951:4
1066:19	968:12	990:21	attacked	1004:20,23	1016:13,23
apply 1042:5,6	1054:9	991:24	908:23	baby 1024:8	1022:5
appreciate	1057:25	992:20	attempt 918:23	back 900:24	basis 1040:7
904:4 952:20	arriving	1008:23	980:17	910:22 913:2	bathroom
958:17	967:19	1009:4,12,19	attend 1050:21	934:25	1021:6,8
991:11	articulate	1010:8,15,17	attended	940:11	battle 981:8
appreciates	982:22	1016:21	1050:24	944:11	bear 1005:11
978:16	articulated	1032:3	attributable	947:19 953:3	1010:8
approach	919:13	1036:2,2	930:8 936:18	960:7,8	bearing 1039:7
906:3	ASAP 923:20	1058:16	937:3	971:10	beat 1012:22
approved	Asia 901:24	1061:5,17	attributes	972:20	beaten 1011:9

1013:8	believes 982:6	blue 900:16	935:18 936:2	1001:7,15	907:21 908:2
1038:20	982:6	1008:5,8	936:4 956:9	1003:24	940:17,19
beautiful	BENCH 0:2	1023:5	976:3 993:17	brutal 939:13	California
1030:17,19	benefit 906:2	1024:16	994:8	939:22	984:20,23
1037:25	983:14	board 967:22	1046:25	brutally	985:6,20
1045:17	1037:24	body 1012:17	BRENDA	939:14,15,19	986:3,8,17,25
becoming	1039:11	1013:24	1048:8	build 988:18	988:7
1013:14	1068:4	1023:3	bridge 969:7	building	call 900:3
bed 1052:8	best 965:6	1033:11	969:11,13	989:21	915:15
1053:3,5,9,11	995:19	1038:5	brief 904:19	1050:13,21	943:12
1053:12,15	1027:22	boiling	1038:23	1050:25	956:10
1053:16,19	1067:15	1023:19	briefly 947:14	1056:8,15,23	994:11
1053:19	better 972:5	Boo 1052:21,23	1036:6	bullied 947:23	1006:3
1054:13	1001:6	book 903:16	bright 1020:20	bullies 947:21	1007:23
1059:4	1027:16,18	957:19	bring 983:14	bullshit	1014:8
1063:6,10,19	1028:13	boss 911:20	British 947:18	1024:10	1019:19
1064:5	1055:14	912:11,17	broadcast	bully 947:24	1043:6
bedroom	beyond 992:24	915:18	1027:21	bullying	1047:2
1051:14	1054:15	931:10,19	broken 907:23	948:17,18	called 928:25
began 1032:7	1060:5	954:5,6	907:24	bundle 900:15	943:9 957:2
beginning	bi-folding	boss's 934:16	924:17	900:16	1008:13,14
945:7 964:10	921:11,12	bottle 919:23	933:15,24	959:17,18	1014:8,25
965:5 968:14	bible 957:13,18	933:15,24	951:6 969:15	986:12	1021:24
968:16	957:20,21	951:6	1037:3	1000:6	1022:7
1046:11	958:4	bottom 900:25	1051:20	1028:14	1035:17
1050:8	big 989:25	910:20,23	brother 923:20	bundles 0:22	1042:25
1057:6	1009:2	921:25 923:9	bruise 926:4,6	900:15 972:4	1052:16,19
beginnings	bigger 989:14	923:17 927:9	937:6,7,10,10	996:2	1052:21
1025:21	bit 922:14	929:10	937:11,12	burdensome	1058:25
begins 939:8	926:13	931:21	951:11,12,12	1042:3	camera 963:18
behalf 958:19	927:21 959:2	936:25	951:14,15	Burin 1021:25	970:17
960:16 977:4	964:10	937:23	969:6,9 970:2	1022:2,16,16	campsite
977:7 980:20	1028:18,19	938:23 950:9	970:9 973:25	1035:10,12	906:23 943:3
992:11 997:5	black 918:15	983:11	1065:3	1035:17,25	candour
1042:25	970:10	984:11	bruised	1036:6,10	978:17
behave 965:10	1017:18,22	1000:10	1019:17	burn 949:14,18	car 919:20
behaving	1017:23	1004:23,24	1022:6,10	950:19	925:9 947:2
965:11	1018:3,6,7,12	1005:23,24	1036:4	burnt 931:25	974:24 975:3
behaviour	1018:12	1007:4	bruises 973:25	Burton 0:19	care 954:6,7
918:9	1019:2,17,21	1014:14	974:13	business	cared 1009:9
belief 988:23	1019:23	1016:17	1033:10	923:20,24,25	career 983:13
believe 928:13	1020:2	1021:20	1036:8,9,11	962:21	989:8 1031:2
931:7	1025:20,21	1024:17	1036:12	974:21,22,24	Carino 983:22
1017:17,20	1034:7,21	1049:4	1038:4	buy 940:12	989:12
1018:11,25	blame 1067:23	box 910:14	1057:17		Carly 1014:9
1020:2	bleeding	911:8 913:11	bruising	C	carriage
1024:14,19	969:14,15	1015:8	947:21,22	C 0:21 977:3	940:18,19,20
1034:6	blocks 1007:19	brave 1020:7	970:10,23	991:24 992:4	940:21
believed	blood 1023:18	Bravo 1004:17	971:2 974:10	1026:16	case 902:17
1063:10	bloody 967:20	break 935:10	1000:25	cabin 907:18	903:24 905:2

905:20 931:9 931:17 934:16 940:9 966:4 978:12 979:8,14,19 979:22 980:12,22 981:2,22,24 982:25 983:2 983:2 986:20 989:22,25 1010:3 1043:12 1060:2,9 1063:15 1066:18 1068:10 cases 1010:19 catch 957:15 959:12 975:2 1047:10 1055:8 caused 908:24 1034:2 1053:20 cell 947:17 central 986:20 certain 1043:19 certainly 1015:18 chain 1016:11 1021:23 challenge 1039:12 1041:19 challenged 973:24 987:10 1032:18 1041:18 challenging 1039:9 chance 1037:7 1037:8 1038:8 Chancery 0:14 change 973:13 1033:18 1034:2	1038:7 changed 903:25 905:3 905:9 912:23 1034:23 changing 904:8 character 964:20,22,25 965:14,17 1062:4 check 914:19 959:3 991:13 1006:13 1048:11 cheek 919:24 970:3,9 1027:3,8,11 Cherer 0:14 cherry 982:5 chief 905:13 childlike 939:24 children 921:16 961:10,12 choice 911:23 957:12 chooses 1066:11 chosen 1067:3 1067:5 Christmas 922:6 968:5 971:4 1018:18 CHRISTOP... 0:9 cigarette 919:24 931:25,25 932:7,13 949:14,15,18 950:19 circumstances 931:11,13 940:9 1032:11 civilian 987:9 claim 0:1 986:20	claimant 0:9 0:18 1043:2,5 1066:9 claimant's 933:22 935:22 979:7 979:22 980:21 1041:17 claims 1035:9 CLARA 0:19 classic 903:12 clean 1050:9 1055:11,12 1057:22 cleaned 1055:4 1063:24 cleaner 1050:6 cleaners 1054:4 cleaning 930:22 clear 918:7 946:21 947:4 963:21 982:21 1001:3 1003:4,6 1037:16 1038:13 1063:20 1064:23 1067:3,4 clearly 942:5 1024:17 1033:9 clerk 976:5 click 1028:9 client 1036:4,8 clientele 998:11 clip 963:17,19 963:20,24 964:2,6 965:2 965:5,11,13 972:9,9 973:12,13 close 926:24 967:11 1002:24	1006:6 1008:15 1009:9 1033:7,22 1036:17 1058:20,21 closely 1036:25 closer 970:17 970:24 closet 1021:6,6 1021:7,10 closing 1066:9 clothes 1021:8 1021:9 clumps 1036:5 CNN 977:5 992:11 cocaine 923:23 coherent 917:7 917:15 colour 1027:10 1027:11 coloured 900:15 Columbia 1050:13,21 1050:24 1056:8,15,23 column 952:19 952:22,24 1012:6 columns 952:17 come 908:18 911:21 913:7 920:5 934:15 934:25 948:19 953:9 954:15 986:19 1008:12 1009:12 1028:25 1030:25 1042:3 1057:14 1062:3 1063:6,21 1065:7 1068:4	coming 902:7 931:19 954:21 957:6 994:15 1000:25 1034:12 1036:17 1037:10 1038:14 1046:12 1065:15 comment 964:16 989:21 1004:9 1060:8 1061:4,5 comments 1061:16 commit 1046:5 committing 913:19 communicated 1022:16 communicati... 1007:23 1011:25 COMMUNI... 0:2 company 911:18 912:6 920:5 922:18 compared 1023:17 complain 1003:25 complaining 1022:9 complaint 1013:7 1017:13 complaints 980:14 1004:3 completely 902:16 917:15 924:3 924:4 931:12 933:15,23 940:19	944:23 951:5 994:19 completes 976:2 1046:10 1067:8 complexion 1045:15 Computer-ai... 0:13 conceded 992:2 concern 1040:21 concerned 905:25 907:10 925:5 954:23 968:19 977:13 990:5 1039:7 1055:5 concerns 981:8 981:10 1041:15 concertinaed 921:10 conclude 935:3 1060:18 concluded 906:14 concludes 975:16 1065:14 concussion 1008:13 condition 928:2 966:25 conditions 1036:21 confide 1006:9 1006:15 1036:20 confidential 990:22 confidentiality 990:9 confidentially 990:7 confined
---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------	---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------	---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------	----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------	------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------	--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------

1043:6	920:3,16	considerably	1064:15,15	996:13 998:3	1041:5
1044:19	921:1 922:1	979:20,22	1064:17,22	998:5 1000:4	1042:23
confirm 901:9	923:1 924:1	considered	conversations	1003:17,21	1046:4
901:11	925:1 926:1	1044:15	928:7	1015:11	1060:14,15
960:11,13	926:24 927:1	considering	converse	1021:18	1062:4
963:23 964:4	928:1 929:1	940:8	1055:22,23	1026:3,6,7	1063:5
985:2 996:9	929:10 930:1	considers	conversing	1030:3	1065:7
996:12,25	931:1 932:1	992:11	1055:17	1033:12	1066:17
1025:6	932:12 933:1	constantly	convinced	1037:23	1067:12
1026:24	933:18 934:1	903:24	983:19	1038:2	court's 982:11
1049:10	934:11,25	contact 908:18	1042:8	correcting	982:12
1055:5,16	935:1,5,16	908:20	cooked 921:6	939:18	986:13,16
confirmed	936:1,7,9	935:23	copied 993:10	corresponde...	1066:16
985:10,19	937:1 938:1	1011:7	copies 1003:4	977:4 992:2,5	courtroom
1043:2	938:15 939:1	1025:16	coping 911:23	couch 1012:25	992:7
1058:3	939:10 940:1	1035:18	copy 983:4	counsel 959:10	Courts 0:3
conflict 1009:4	940:4,14	1058:24	991:25	counsel's	cover 1020:20
1045:23	941:1,5 942:1	contacting	1001:6,13,16	1060:15	1021:14
1046:3	942:3,25	1009:17	1028:5	countless 982:2	covered 917:25
conflicting	943:1,2,16	contacts	1041:4	couple 908:18	918:15
905:21	944:1 945:1,3	1023:4	Corden 1033:5	933:7 942:4	1044:9,17
confused	946:1,21	content 952:14	1035:22	942:12	1051:25
1018:16	947:1 948:1	1060:11	1045:3	944:10 952:9	covering 980:4
confusion	949:1,6,8	contents	Cordon	1022:5	Cowan
990:11	950:1 951:1	960:13	1017:17	course 916:17	1005:15,17
connected	952:1,21	996:12	corner 900:25	922:15	1005:19,20
989:6	953:1,16,22	context 952:21	927:10 950:9	931:10 935:8	1006:6
Connell	953:23 954:1	continue 984:9	1007:4,10	935:25	1007:25,25
1005:14,17	954:18,21	1039:19	1011:19	963:11	1008:4
1005:19	955:1	1040:12	correct 907:18	979:16	1013:6
1007:25	Connolly's	1043:13	908:9,10,13	986:15 988:6	CPR 992:24
Connolly 900:1	906:14 931:4	contrasting	908:15 910:5	1043:7,20	cramped
900:4,5,7,9	conscious	905:21	910:10	1060:8,9,18	910:15
900:12,13,18	1067:9,12	control 1014:7	912:16,18	1067:5	crazy 1024:14
900:22 901:1	consequence	controlled	913:14,18	court 0:1,14,22	creating
901:4,13,15	1041:21	918:7	916:15 921:9	902:6,7,21	980:14
901:20 902:1	consequences	1061:22	925:6 931:8	905:14,24,25	criteria 948:18
902:2,18	995:13	convenient	934:9,9,18	913:5 927:23	criticised
903:1,9 904:1	1039:23	935:5 976:11	936:22 942:7	935:5 945:15	1060:2,12
905:1,24	consider	994:17	946:18	954:23 959:3	criticising
906:1,20	905:10	conversation	948:12,13	960:11	909:12 978:5
907:1 908:1	906:11	917:12 934:2	958:13 961:4	963:18,19	993:12
909:1 910:1,3	961:20,25	934:7 953:18	961:12	975:17 978:7	criticism
910:15 911:1	964:21	1009:21	962:25	978:25 981:9	1066:14
911:9 912:1	1008:21	1017:8	963:16	986:22 987:2	criticisms
912:14 913:1	1044:16	1020:22	965:23 966:2	987:7 989:18	979:3 1066:8
914:1,9 915:1	1067:5	1034:4,5	968:22 969:2	995:9 996:9	cross-examin...
916:1 917:1	considerable	1035:21,23	970:8 973:10	1000:18	905:13
918:1 919:1	902:12,13,25	1035:24	973:23 974:9	1027:19	942:16
919:12 920:1	980:8	1040:20	975:5,5 996:6	1030:24,25	1039:4,12,19

1041:16	1025:21	dated 913:3	1009:20	1064:4	962:5,20
1043:8,13	cuts 1033:10	915:11 963:7	1012:2	defecating	974:18
1044:5,14,19	1038:4	983:5	1041:11,23	1053:15	Depp 0:9
1059:23	<hr/>	dates 904:8	1059:7	defence 980:13	901:25
1060:11,18	D	999:8,21,25	1060:17	defendant	904:25
1067:21	D 0:21 992:2	dating 980:14	1067:10	1039:8	905:13
cross-examine	1004:16,19	David 0:17	dealership	defendants	906:23 908:8
1039:15	1049:4	1024:4,6	974:24 975:3	0:12,20	908:11,16,22
1042:9	D157 1049:4	Dawn 995:10	dealing 947:7,9	904:16	909:4,5,8
1068:4	D171 901:4	day 0:22	947:11,12,15	960:17	910:3,6
cross-examin...	D25 983:10	914:22 915:6	951:14	989:23 997:5	912:17
910:2 961:2	dad 1023:12,15	915:6 946:20	953:16	1039:24	916:11,16
998:2 1040:4	1023:19	977:17	977:23	1043:10	917:4 918:12
1043:3	1024:10,11	996:19	978:25	1049:14	919:19 920:5
1050:2	dad's 1023:18	1007:22	1066:16	defendants'	921:14 922:4
cross-examin...	damage 913:25	1011:21	deals 915:12	905:2 929:16	922:8,17,20
1043:23	914:6,11,15	1014:7	977:14	929:16	923:3,17,21
cross-purposes	915:6 924:13	1018:19	dealt 903:22	1043:3	928:7,21
1053:25	924:22 942:6	1019:12	977:17,22	1068:4	930:5 931:2
crown 1002:14	942:9,13,18	1021:24	991:7,20	definitely	932:7,13
1002:17	942:22 943:4	1023:4	1041:24	917:11	934:3,14
cruel 922:13	965:24	1030:20	1044:2	degrading	937:9 940:17
crying 1038:17	1014:7	1033:6,9,19	debate 1067:4	922:12	942:13,14,19
cunt 922:8	damaged 920:7	1033:20	Debbie 966:21	delay 958:12	942:23
984:13	damn 1023:11	1034:22	December	958:16	943:20 944:4
cup 1061:19	DAN 0:11	1036:3	970:6 983:6	966:14	944:12,14,15
cupboard	Danny 930:13	1042:4	999:9,22	995:16	944:21
964:8,9,11	930:13,13	1050:20	1000:5,19	deliberate	945:12,15
972:16,16	dark 900:16	1051:6	1003:11,15	1039:17,19	946:19 948:6
cupboards	1001:4	1054:6,7	1005:11	1040:11	949:15
964:7	darker	1058:13,24	1007:22	1044:5,6,8	950:11,23
curtail 1060:11	1027:10,11	1068:10,10	1011:21	1067:5	951:20,21,24
1068:9	date 938:14,18	daylight	1012:2	deliberately	952:10,11,17
Custodian	938:19 960:5	1038:11	1016:4	1042:10,12	952:24 953:7
1006:25	967:12,12	days 904:12	1017:15,15	demanding	953:12,17,18
1007:11,24	991:17	954:12	1019:12	923:3	953:23 958:6
1013:15	996:13,18,21	1022:5	1026:5	demeanour	962:5 963:23
cut 919:22	996:21,22	deal 904:9	1032:4,8	947:23	964:4,21
920:12	999:23	905:11	1033:2,6	demonstrate	965:10,21
922:14,21	1000:22,23	906:17	decide 989:2	1025:11	967:14 968:2
923:18	1005:11,14	911:22	1009:25	demonstrated	968:5,23
933:15,23	1007:13,19	913:12	1043:22	958:15	969:16,19
934:4 945:20	1007:20,22	934:21 935:2	decision	departure	972:15,17
945:23	1011:25	935:2 936:7	982:11,12	1043:20	973:12,18,21
946:13,23	1012:17	942:16 965:5	1039:15	depend 954:11	974:17 979:9
947:3 948:8	1015:4	976:7,13	1040:11	954:13	979:15
951:5 969:12	1016:7,7	977:2,5,8	1044:4,6	depended	980:14,17,20
969:13	1017:15	980:24	1066:25	954:10	981:6,11,20
993:25	1030:24	982:19 983:4	defecate	974:16	982:4 983:22
1008:15	1057:5	990:14	1053:2	dependent	985:2,17

988:5 989:2,3	described	965:13,17	993:1 994:1	documents	967:25
989:15 995:6	930:18	967:12,25	1006:5	966:13	1005:19,20
996:17	980:20	1001:8,17,21	1042:20	981:17 982:4	1006:6
998:17,20	981:13	1006:23	1066:1,3	991:23	1007:25
1008:21,24	1036:8	1039:8	1067:1	992:20,22	1008:4
1009:5,5	describes	1045:18,25	1068:1	997:9 1010:7	1013:6
1010:2	989:12	differently	disgusted	dog 1052:16,19	dragged
1017:14	describing	909:4	1052:10	1052:21	911:14
1023:13	920:25	difficult 947:7	1063:20	1053:2	dramatic
1030:25	1011:7	958:21 968:7	dishevelled	dogs 1052:12	931:11
1038:20	descriptions	970:18 978:6	918:16	1053:14,15	dramatically
1045:23,24	943:12	1015:25	disproportio...	1053:19	905:21
1046:3	desperate	1020:7	982:24	1063:7,10,22	drawn 910:8
1048:7	939:24	1027:6,7	dispute 1031:7	1063:24	dress
1050:3,20	destroy 983:21	1039:8	disputed 922:3	1064:4	1021:6
1051:6,11	detail 967:3,4	difficulties	distance	doing 906:2	drinking 917:9
1052:4,12	1058:17	967:4,13	930:24 931:4	993:12	1061:19
1055:15	1060:7,13	968:10	931:9	1006:13	driveway
1056:17,21	details 988:10	difficulty	1064:21	1014:7	947:3
1059:14	detoxification	903:24 965:4	distortion	1040:7	drugs 918:3,5
1060:23	965:25	967:6 1060:6	969:7	1067:6	918:8,8,8,10
1061:18	966:19 967:5	dinner 908:20	Distraught	domestic	923:3,6
1062:4	967:15	directly 1041:7	917:6	912:20 979:4	944:21
1065:6	detoxifying	dirt 918:15	distress 945:16	Domingo	1061:21,22
Depp's 907:3	965:22	disagreement	945:17	1049:4	1061:25
907:18	devastating	1014:19	divider 900:16	door 916:20,21	drunk 917:24
913:12	911:21	discern	900:20	916:23	918:2
915:21	develop	1015:25	926:22 933:6	919:20	1061:15,18
920:18	1019:22	disclosure	936:12	921:12 924:8	1061:20
927:24	deviate	981:5	937:18	925:10 948:6	due 969:7
929:15	1050:15	discretion	1048:19	964:7 972:16	1060:8,9,18
933:23 945:9	device 928:6	905:17	dividers	1038:14	duties 1054:16
951:3 961:3	devices 921:15	discuss 920:11	926:21 996:4	doors 920:25	
962:22	959:8	966:23,25	DIVISION 0:2	921:8,10,12	E
964:22,25	dial 1006:16	discussed	divorce 979:11	921:15	E 0:21,21
966:19,23	diary 937:21	920:18	979:12	940:21,23	923:20,24,25
980:12 983:5	938:18,21	discussing	982:10,14	948:20 964:5	944:17
987:3 988:21	943:17,18,20	951:3	984:23 985:6	dossier 980:14	1026:17
988:22	dictated	discussion	985:23 986:4	981:12,18	e-mail 991:17
998:15,25	1067:21	913:10,10	986:9,17	988:24	993:9
1037:2,17	die 917:12,13	924:23 967:7	988:7 991:2	989:16	1021:23
1056:2	difference	976:1 977:1	doctor 966:18	doubt 905:23	1023:21
1063:22	990:23	978:1 979:1	1009:18	1002:20	e-mailed 976:6
Depp-appro...	different	980:1 981:1	1010:22	1054:15	1019:12
929:17	902:20 903:8	982:1 983:1	1011:7	Dr 918:25	E168 900:25
describe	903:17 904:3	984:1 985:1	document	919:6,7,10	earlier 985:18
920:24	938:4 940:18	986:1 987:1	900:17	922:4,17	990:19
1021:5	940:19	988:1 989:1	938:11,12	928:8,17,21	1008:6,13
1037:6	943:12	990:1,19	952:4 996:5	928:22,24,25	1027:20
1045:15	964:23,25	991:1 992:1	997:7 1049:3	966:18	1030:5,13,13

1051:6	959:17,18,21	1039:20	982:16,18	900:6 958:3	924:22
early 939:21	966:5,6	1055:2	983:23	995:3 1048:3	942:22
958:8	Email 0:15	entrance	984:19 985:6	example	extra 1000:11
1019:12	emasculates	993:25	985:10,15,17	902:24	extract 938:21
1033:2	979:22	entry 937:21	985:22 986:2	903:12	946:8,18
1054:12	embarrassed	938:18	986:3,8,11,14	1040:16,23	947:6
1056:17	922:16	943:16	986:17,21,25	excursions	extracted
earn 962:18	embroiled	episode 1032:4	987:4,6,8,9,9	908:20	919:7 929:24
earned 985:17	934:13	equality 982:3	994:16	excuse 927:19	930:20
988:5	emerged 936:9	Erin 1021:24	995:12,13	exercise 1010:6	950:23
earnings 987:3	emergency	1022:2,16,16	999:25	expected	extraction
earth 1018:13	1006:3	1022:18	1000:18	1054:16	947:17,17,20
easier 910:12	1007:23	error 911:19	1003:10	experience	extremely
926:14	1011:8	establish 965:3	1021:17	912:8 947:14	1051:13
963:12	emotion 984:8	establishment	1022:24	953:16	eye 970:10
1041:5	emotional	947:25	1025:19	1053:14	1019:17
easily 919:19	1014:7	estates 961:3	1026:5	experienced	eyebrow
Eastern	employed	evening 1033:2	1029:11	947:12	1028:19
1050:12,21	1050:3	1067:16	1033:15,18	1042:25	eyes 918:11
1050:24	employee	event 905:25	1034:2,23	1067:3	970:10,23
1056:8,15,23	967:11	913:24	1038:7,23	expert 984:20	971:2 1001:2
easy 958:21	employees	915:12	1039:9,25	985:22 986:2	1001:4,7,15
Ecstasy 923:25	961:17	919:18	1040:2	986:3,8,14,17	1001:18,22
educational	enable 962:18	934:15	1046:10,12	986:25 987:8	1003:24
922:12	encounter	988:24 989:3	1047:5	987:9	1015:20,20
Edward	1037:7	989:12	1048:4	explain 901:14	1015:21
1026:17	1038:8	events 913:20	1060:8	947:14	1017:18,22
effect 915:23	ended 939:12	915:13	1062:8	958:11 974:7	1017:23
915:24	939:19	950:22	1063:8,15	978:20	1018:3,6,7,12
919:21	endless 922:12	1042:21	1064:10,11	989:18	1018:13
effectively	engaging	eventually	1065:15,16	996:16	1019:2,22,23
915:18,20	1024:17	919:19	evidence-in-c...	1004:7	1020:2
980:3 981:5	English	evidence	903:13	1021:2	1025:20,21
1054:21	1048:16	904:13	evil 922:7	1034:9,19	1034:7,21
either 935:2	enquiries	905:16	ex-prison	1038:10	
957:11,12	976:21	906:14 914:2	947:16	1041:7	F
959:6 994:18	enquiry 1020:4	914:4 922:3	exact 913:25	explained	F697.190 911:5
1009:24	entire 980:12	926:7 931:6	933:21	948:11	F813 966:11
1010:9	980:12	935:17,18	exactly 993:16	978:22	F894 1000:11
1021:10	1021:11	942:25	1041:15	explanation	F894.052 950:9
1025:11	entirely 981:6	954:21 957:7	1044:12	949:4	F894.107
1053:2	992:10,14	964:20,22	1054:18	explanations	1001:15
1063:22	1067:21	965:20,24	examination	920:6,14,17	F894.109
elaborate	1068:3	966:3 968:4	991:9	948:11,14,23	1001:23
979:8 980:13	entitle 986:25	969:22	examination-...	express 943:13	F894.114
elaborated	entitled 900:17	973:14,20	901:13	984:22	1002:7
987:21	964:21	975:16,17	906:11,19	1059:10	F894.132
ELEANOR	979:15,21	976:2,4,20	examine	extended	970:16
0:17	982:10	978:9 979:7	905:14	1043:19	F894.143
electronic	985:20 996:5	981:16	EXAMINED	extensive	1002:21

F894.145 1002:14	1038:17 1063:9	939:24 984:7	1021:19 1026:8	946:13,23 947:4 948:9	993:19 1021:25
F894.159 1026:11,22	facts 901:9 997:2	feature 1041:17	1032:20 1035:15,16	948:12 949:2 951:3,5	1036:24 1046:19
F894.161 1027:12 1028:6	factual 986:18 faeces 1052:8	features 1053:20 1063:9	1044:21 1048:18	finish 915:9 995:22	1063:18 five-hour 928:6
F894.163 1028:24	1053:16,18 1054:11,13	February 913:3 980:5	files 910:15 1023:8,24	1006:10 1034:16	flag 1066:2 flat 928:25,25
F894.241 1029:14	1054:24 1059:4,4,5	feed 993:24 feel 1022:6	1048:17 filming 1034:6	1060:11 finished 1034:17	1051:3 1052:24
F978.62 927:10	1063:6,19,21 1063:21	feeling 972:4 1017:11	filthy 918:13 918:15,17	finishes 1023:22	1056:15 1058:9
F978.80 929:7	1064:2 fair 931:16	feels 1042:17 fell 939:23	final 939:25 975:7	firm 974:24,25 first 902:13,23	flats 1050:13 flew 996:20
F978.81 929:6	942:5 954:16 977:25 982:3	felt 912:19 939:21	finally 910:3 939:23 940:6	910:18 913:4 913:8,20,20	flooded 904:4 floor 0:14
F987.11 936:14 936:21	1038:10,22 fairly 931:11	1054:25 festival 1054:3	954:14 960:13	918:23 926:16,18	1051:20 1052:25
F987.3 933:12	1045:12 faking 1016:13	fifth 1039:17 1040:6,16,23	984:12 1045:22	927:9 936:8 938:2 945:22	1053:2 flow 968:13
face 919:25 926:3,4,6	1016:23 falls 1066:13	1042:15 1044:15	financial 962:17	945:24,24 946:3,7,13,16	1039:23,24 fluent 1055:18
931:25 932:8 932:13	false 980:14 familiar 918:5	fight 938:24 940:3,6,25	985:13 987:25	946:19,21,22 947:5 948:8	1055:21 follow 927:17
949:16 950:14,15,16	1013:14 family 961:8	967:22 970:5 fight 981:8	financially 983:14	951:2,14 952:17,24	963:12 followed 902:17
950:17 1020:7	962:21 974:21,22	figure 980:8 990:5 996:16	find 900:15 901:4 917:4	957:6,10 958:5 965:21	1011:8 following 907:23
1026:6 1027:10,12	1046:6 1055:3	1009:2 file 900:20	933:8 990:7 991:16 996:5	983:10 984:25	923:18 931:21
1028:17 1029:8,20,25	far 905:23,24 907:10	910:13,19 921:17,17	1044:22 1045:7	994:15 996:6 1004:23,25	939:25 967:15 979:4
1030:2,15 1033:11,13	908:20 922:11 924:5	926:11,12,13 926:15,16,18	1048:17 1049:3	1010:4 1024:12	follows 939:12 1019:16
1038:4 1045:11,15	925:4 954:23 968:19	933:6 936:10 937:15,16	1048:17 1049:3	1028:7 1037:11,14	1023:6 foot 964:10
1057:17,19 1057:22	977:13 990:5 1005:24	949:21,21 950:20 952:4	finding 1007:6 1040:25	1037:15 1047:7	968:23 forgive 969:8
1064:16,16 1064:18,18	1018:2 1029:22	952:5 959:10 959:17,18	fine 900:20 994:20	1048:6 1056:20	1027:17 forgot 936:7
1064:23,24 faced 1009:22	1055:5 1064:19	966:11 970:15 983:8	finger 917:20 917:20	fit 948:18 fitting 942:10	1044:20 forgotten 913:15
faces 988:18 facetious 1036:18	fast 946:6 fast-forward 1029:14	996:2 1004:11,13	919:21,22,23 920:7,12,18	915:11 919:17	form 966:5,6 991:23
fact 902:24 924:23 929:7	1064:19 fast 946:6	1006:17,17 1013:11	920:23,24 921:13	923:19 929:3 934:15,23	1053:21
931:10,21 981:11	fast-forward 1029:14	1015:4 1017:24	922:14,21 923:19	933:15,24 934:4 945:20	
987:16 989:7 989:24	fault 918:7 969:8 1007:3		933:15,24 934:4 945:20	945:23 945:23	
1005:2 1022:23	favours 922:13 fear 908:24			938:23 956:4	

formal 977:9	1046:5	1046:8	given 901:22	1015:3	996:24
format 1006:23	front 921:18	1064:4	903:6 931:13	1016:9	1002:13,20
1013:14	924:5,5,8	1065:11	965:20	1017:24	1002:22
formed	925:10		973:20	1019:4,8	1004:3,8
1053:15	926:11,23,24	G	979:10	1021:19	1006:2,12
forward	926:25	G 0:21	986:17	1022:13	1011:16
903:21	936:10	Garcia 1047:11	995:12	1024:3	1014:19
920:14 933:7	957:18,20	1047:12	999:25	1026:8	1017:3,3,25
948:19	959:8,24	1048:21	1010:22	1027:12	1018:15,18
1010:23	963:12	1064:19	1033:14	1035:24	1019:10
1015:3	989:10	1065:14	1040:3	1046:13	1020:19,23
1044:7	1021:19	gash 968:23	1048:4	1050:12	1022:13
forwarded	1027:24	969:5,12	1060:9	1060:5	1025:4,9,14
993:10,11	1032:15	gathered 988:3	gives 962:10,12	1063:10	1027:16,18
1024:6	fuck 940:11	general 907:13	999:3	1064:14	1028:3,4,22
found 927:5	1024:14	907:15	1035:25	goes 978:11	1028:23
933:16,24	fuck-up	generally	giving 904:13	980:11,12	1035:12,16
937:19 940:6	1017:11	959:11	935:16,18	985:5 988:8	1036:23
991:15	Fucked 922:4	gentle 1067:17	964:20 976:3	989:25	1037:18,20
993:14	fucking 919:22	1067:19	984:19	1024:4,7,20	1041:24
1020:6	945:20,23,25	1068:2	995:13,20	1036:2,8	1042:5,6,8,13
1044:23	946:9,10,17	getting 921:12	1043:11,23	going 901:12	1043:13,20
1053:18	946:23 947:4	966:13	1062:7	901:22 902:3	1048:6
1054:13	948:8	1019:10	glad 911:13	902:4 904:3	1057:6
1059:5	1017:11	1021:10	glass 996:19	904:17,21	1058:11
1063:6	full 900:12	1048:11	1051:20	905:10,19	1063:12,14
four 911:8	911:5 922:6	girl 1014:2,4,6	1061:13	906:3,9	1067:10,11
930:21,23	959:3 968:13	give 904:19	go 910:19	909:14	1067:18
940:21,23	995:8	905:15,18	913:2 914:16	911:12	1068:7
961:17,18	1060:10	920:6 945:25	914:18,24	917:24	gold-digger
976:16,23	fully 1060:3	946:9,10,17	918:25	920:10,24	979:6,24
983:18	fumbling	946:23 948:7	921:19,19,22	926:9 927:15	981:21
991:20	1041:4	952:21	922:15 929:6	930:7 943:2,6	986:19
1012:6	furniture	954:21 957:6	930:11	945:3,4	gold-digging
fourth 952:21	964:5	959:3 967:13	931:21 933:6	947:18	984:9,10,13
953:9	further 903:21	972:3 975:17	937:18	950:21	989:13 990:4
foyer 924:5	904:4,24	985:15,17,22	938:23 939:4	957:10,22	good 900:2
frank 1030:23	906:5,10,12	986:3 987:22	943:3 954:24	958:5,18,25	907:13,15
free 954:23	906:19 924:7	988:4 990:20	959:10	960:7 963:17	911:20
969:23	934:22 935:6	990:24,25	970:15 978:4	966:3,4 970:2	919:16 927:7
1046:13	950:2 954:20	991:17	978:8 983:10	970:15,16	958:8,8,10
fresh 1054:11	975:14	994:16 995:8	994:4 1000:8	972:4,20	976:15,24
Friday 931:23	976:21	1034:12	1001:5,23	973:11	977:2 989:23
1054:7	978:21 980:2	1039:9	1002:6,14	976:25 978:7	991:12
friend 911:20	986:22 988:4	1042:14	1004:15	982:8,15	994:15
912:11	988:9 989:8	1046:12	1006:17	987:6,21,24	999:20
1056:4	990:21 991:7	1047:4	1007:8	988:12	1006:7,12
friends 906:22	991:8 992:8	1062:4	1011:14	991:13,16	1012:22
963:4 1016:6	1014:20	1065:15	1013:11,11	992:24 994:2	1013:8
1033:22	1044:4,13	1068:6	1014:11	994:17	1023:21,22

1033:6	1005:4	940:11 978:3	940:18	1024:3,4,9,11	1035:2
1048:9,9,14	H39 1005:2	1002:15	943:17,22	1024:13,16	1036:6
1048:15	H426 952:6	1003:25	945:6,10,18	1024:19	1039:16
1055:6,14	H81 1007:6	1022:6,10	945:18,19,23	1025:15,20	1040:6,23
goodbye	H81.1 1007:4	1036:4	948:20	1026:2,11,25	1042:15
1018:15,17	habit 1060:5	head' 1017:10	951:11,18,19	1028:9	1044:15
1034:13	haematomas	headache	951:20,21,23	1029:12	1045:11,15
goose 922:6	1036:7	1022:4	951:24,25	1030:4,8,13	1063:22
Gottlieb	hair 1025:23	1048:11	953:16,24	1032:8	hearing 924:25
1019:13,14	1036:5	headbutted	964:2,6 968:6	1033:3,9,22	958:13
1035:2,2	half 915:25	1017:9	968:20 969:9	1033:24	995:16
grabbed	916:10	HEADERS	969:22	1034:4,25	heart 939:22
908:23	979:15	1048:11	970:21	1035:10,17	980:21 981:2
graffitied	HAMER 0:19	health 1036:21	972:15,18	1035:24,25	989:25
924:10	hand 919:22	hear 907:20,21	973:12,18,21	1036:3,9,14	heavier
granted 903:14	947:3 957:21	916:21,22,23	974:7 979:4	1036:20	1021:15,16
grateful 906:18	967:21	928:8 957:4	979:10,23	1037:2,6,9,17	heavy 1021:14
906:20	1009:5	958:14 959:6	980:13,19,25	1038:6,23	held 970:16
993:18	1060:10	959:11	981:12,16,19	1039:2,7,9,25	help 932:18
995:24	handwritten	963:13,22	982:5,9,15	1041:18	933:2 937:9
996:25	938:12	965:8 967:22	986:19	1045:2,24	945:15
1034:18	hangover	969:8 972:7	988:23 989:2	1051:11	950:11,17
graze 969:6	939:22	972:16 988:9	989:9,17	1052:12	982:7 985:9
greater 987:11	happen 957:10	990:22	990:11 991:2	1053:23	1007:16
greatest 981:21	989:18	994:13,14	998:20 999:6	1054:6	1008:12
ground 940:13	992:25	995:21	1000:2,16,21	1055:5,11,17	1025:9,14
Group 0:11	happened	1000:18	1003:12,15	1055:21	1030:25
958:19	906:6 907:21	1001:19	1004:4,7	1056:4,10,14	helpful 900:10
guys 947:18	919:5 929:4	1018:5	1005:19	1056:23	978:12,19
	942:24	1022:24	1006:2,5,6,25	1057:12,13	991:10
H	977:25	1043:14	1007:11,24	1057:23	1032:17
H103 1013:16	1009:23,23	1052:17	1008:4,18,22	1058:6,17,20	1066:12,21
H106 1014:14	1011:7	1055:19	1009:6,17,22	1059:14,14	helps 991:17
H107 1015:5	1017:14	1058:15	1010:2,8,11	1059:15	Hey 911:12
H108 1015:14	1033:25	1067:2	1010:18,21	1061:6	1014:2,4,6
H109 1015:18	1034:5	heard 902:2	1011:6,19	1064:14	1022:4
H110 1015:22	1040:17,17	903:7 904:8	1012:17,20	1066:23	hi 911:12 922:4
H111 1015:24	1041:13,16	904:16	1013:7,15	1067:17	Hicksville
1015:24	1043:4	906:22	1014:17,25	Heard's 908:11	901:18,23
H112 1015:24	1054:25	907:23	1015:14,19	930:18	902:11,24
H116 1022:20	happy 965:5	908:22,23,25	1016:5,11,25	938:21 981:7	905:7 906:21
H117 1024:3	977:15	909:4 910:3	1017:8,13	981:21	913:21
H119 1024:25	1014:22	911:9 912:8	1018:2,11	998:21,23	914:14,19,21
H127.1	1041:21	912:14	1019:12,20	1002:4,23	942:3,21
1021:20	hard 917:10	913:10 922:3	1020:20	1007:16	high 0:1 958:24
1022:15	964:6	922:9 925:5,7	1021:14,24	1022:24	Hilda 1047:2
H129.2	1011:23	930:12	1022:9,25	1024:25	1048:2
1016:18,19	hate 940:11,11	932:12 934:4	1023:4,5,6,6	1028:17	hit 937:7 940:9
H30.6 921:22	head 915:16	934:14 937:5	1023:8,10,13	1029:8,20,25	943:20 944:4
H38 1004:24	919:13	937:8,10	1023:19,20	1033:13	951:13,19,19

951:24	977:22	1058:9	934:3	influence	921:15
953:24	978:16	housekeeper	1023:23	1061:21,24	instances
973:18 989:2	1008:6	1050:6	1040:21	influential	1041:22
1010:2	1028:3	housekeeping	imminent	998:17	instruct 934:23
hitting 951:20	1039:22	1050:22	939:20	info@mart...	instructed 0:18
HMP 947:16	Hopefully	Howard 977:4	impermissible	0:15	0:19 979:14
hoax 979:8,23	996:2	hug 1020:5,6	1010:12,15	information	980:7
980:13 989:6	1044:22	1034:10,12	important	948:19	instructions
989:14 990:3	hoping 996:5	1038:16	934:24	967:10 980:2	906:12 935:7
hold 949:23,25	horrified	huge 940:10	958:17	985:8,9 988:5	935:14
970:17,24	1052:10	hugely 905:19	1031:2	988:7 990:25	990:10,21
1027:19	1063:20	hugged	impossible	Inglessis	insurance
holding 947:3	hospital 920:10	1018:17	911:14	1020:17,19	981:12,18
hole 939:7	920:11	1034:10	incident	1021:13	988:23
940:3 967:16	922:15	human	901:19	injured 1016:7	989:16
1013:25	950:12	1053:16	904:11,18	1025:20	Intelligible
holiday 969:23	hotel 938:22	1063:21	905:16,22	injuries 908:25	917:17
971:5	hour 915:25	hurt 939:22	929:23	943:22,25	intended
1018:19	916:10	1013:3	incidents	944:6 999:5	942:15
Hollywood	975:18	hurtful 922:11	901:14	1000:3	intention 902:8
998:6,7,9,9	hours 930:21	hurting 911:23	904:15	1003:11	interacted
998:10,10,11	930:23	hygiene 1055:6	905:15	1004:8	1036:25
998:13,17	938:24	1055:14,14	913:13	1011:22	interest
1009:2	939:21 945:6		965:21	1016:6	1012:11
1037:2,17	957:8	I	inclined 988:4	1021:14	interested
1050:9	1038:11	ice 933:16,25	990:24 992:8	1025:17,17	937:9
1056:2,11,18	house 0:14	idea 923:7	1066:23	1026:4	internal 933:12
1057:25	915:21	976:15 999:3	includes	1029:19,24	996:4
Holmes 907:4	916:11,13	1037:9	935:22	1030:8,24	interpreter
907:8,9 923:9	917:2,5	identified	income 954:13	1032:8	1047:5,7,8,10
923:10,12,14	918:12,21	1030:14	962:15,16,16	1033:10	1047:11
923:18	919:2,7,8,19	identify 913:4	962:18,20	1035:9	1048:4
944:11,14,15	921:8 923:4	identifying	974:20	1036:15	1050:17
944:21	923:10,14	959:16	979:15 980:7	1038:4,18	1051:24
holy 957:19	924:3,4,5,6,8	II 0:9	985:17	injury 917:19	1052:17
home 947:25	924:11,18	illegal 918:8	987:23 988:5	920:17	1055:19
961:20,25	926:10 928:3	923:6	incorrect	921:14	1058:15,22
962:2,3	928:5,9,12,12	1061:22,24	996:18	943:21 949:7	1059:21
967:19 975:9	928:23,24	image 1028:22	incorrectly	969:17,24	1061:23
1019:4,8	929:22,22,23	1028:23	970:8	1003:3,25	1063:12
1054:2,3,4,6	930:2,22	1029:23	indicated	1015:20	interrupt
1055:7,9	933:11,11	1030:9,11	1066:5	1025:22	1014:21
1056:2,11,11	946:7,19	images 1015:8	indication	1030:11	interrupted
1056:14	947:5 1037:2	1015:11	967:13	1065:3	939:14,16,17
1057:25	1037:17	1030:4,10,12	indiscernible	inside 914:16	939:19
1058:11	1050:9	imagine 902:3	951:5	914:18,24	1011:4
honeymoon	1051:3,7	957:8	individual	917:2,5	invent 1010:21
908:11,12	1056:18	immediate	1055:7,9,13	insinuating	investigate
938:19	1057:10,12	910:7	inexperienced	1009:10	990:14
hope 911:21	1057:14	immediately	947:9,11,13	installed	investigation

982:24	1023:18,22	937:3,5,8,12	949:11,13,23	1016:10,14	1024:20
inviting	Jerry 915:16	944:23 951:2	949:25 950:5	1016:16,19	
1010:20	928:9,9,14,16	951:6,9,15,18	950:7 951:25	1017:6,19,23	K
involve 968:9	929:18,21,23	1042:24	954:9,20,23	1017:25	KATE 0:17
involved	930:2,8,21,22	July 0:5 901:25	956:5,7 957:4	1018:7,10,20	keep 900:10
912:20	936:19 937:3	903:5 908:14	957:6,10,15	1019:5	988:12
966:19,24	944:23	938:8,14,16	957:18,21	1020:12,24	1040:19
985:11,12,23	Jesus 1024:13	jump 1053:5,8	958:4 964:19	1021:16,22	keeps 1021:7
985:25 992:9	jewellery	jumping	964:24 965:7	1022:15,19	Kennedy 977:4
iO 1012:9,11	1021:9	922:16	966:12,16	1024:22	kept 944:23
1012:13,15	JJ 929:12	June 901:19	967:18	1025:3,8,11	1055:12
1012:22	936:19 937:3	906:21 911:9	970:14	1026:12,17	Kevin 1054:19
1013:9	job 954:12	Justice 0:1,3,7	971:13	1026:24	1054:21
1015:2,2	962:10,20	900:2,7,9	972:23,25	1027:23	kick 964:11
iO's 1012:14	963:2,5	901:15 902:5	973:4 975:2	1028:2,7,25	972:15
irrelevant	974:19 975:8	902:22 903:2	975:15 976:5	1029:4,7	1061:8
1010:6	Jodi 1034:25	903:5,8,17	976:10,15,18	1030:9,11,18	kicked 964:8
island 961:4,6	1035:2	904:5 905:4	978:19,24	1031:8	kicking 964:5
961:8,16,20	Jodie 1019:13	906:6,9,17,19	979:2,17,25	1032:21	kind 963:8,14
961:22,24,25	1019:14,17	907:5,25	980:6,10,23	1034:15,17	973:6 991:25
962:22	JOHN 0:9	909:9,15	981:14 983:3	1035:14,19	1006:14,14
965:22	Johnny 909:8	910:14 911:5	983:7,9,16,24	1036:17	1009:15
967:13 971:4	917:10 919:7	914:5,7,9	984:2,5,14,19	1037:13	1057:17
973:16,17	919:21 925:9	915:5,8,10	984:22 985:5	1039:3,14	kindly 959:2
974:8,11,14	928:23,23,24	916:8,23	985:8,14,21	1040:2,19	King 928:9,13
975:10	929:24	918:24 919:9	985:25 986:7	1041:8	Kipper 918:25
isolated	930:20,22	919:12,16	986:13,16,24	1042:2,12,19	919:6,7,10
1041:14	946:7,19	920:9,16,22	987:6,13,15	1043:18	922:4,17
issue 978:11	954:11,13	924:2,16	987:18,21	1044:3,10,13	928:8,17,21
980:11	963:8,14	925:11,22	988:3 990:16	1044:18,25	928:22,24,25
982:17,24	973:6,8,14	926:2,12,15	990:18 991:5	1045:5,8,10	966:18
989:4	1008:11,19	926:21 927:7	991:12,15,19	1046:10,18	967:25
1041:14	1011:8	927:18,21	992:5,11,21	1046:20,22	Kipper's
issues 1043:7	1030:25	929:25 931:3	993:3,9,14,17	1046:24	1022:7
items 991:14	1050:3	932:11,24	993:19,22	1047:4,7,9,12	kitchen 967:20
991:20	Johnny's 929:2	933:5,8 934:6	994:4,6,10,13	1048:5	967:22
	954:16	934:10 935:4	994:15,21	1052:3,18	1038:14
	join 989:11	935:9,13,16	995:5 997:10	1055:8	knew 983:14
J	Jose 1047:11	935:22 936:2	999:12,16,20	1057:11,13	996:20
J 940:6	journey 901:24	937:17,19	1001:9,14,19	1059:20,23	1029:25
1012:22	908:6 916:4	938:2,4,7,10	1001:24	1060:4,15,21	1063:5,21
1044:24	judge 915:16	938:12,14	1002:22	1063:11	knock 1017:10
J1.13 1044:24	915:20 928:9	939:9,17	1003:13	1065:14	knocked
1045:2,9,13	928:9,14,16	941:4,7	1004:12	1066:11,18	1051:18
J1.14 1045:13	929:18,21,23	942:15 943:7	1005:5	1066:21	knot 940:10
J87N 1044:22	930:2,8,11,15	943:9,14	1006:8,10	1067:7,10,16	know 905:20
James 1033:5	930:18,21,22	944:13,24	1007:5	1067:23	915:18
1035:22	932:16,25	945:2,21	1010:14,24	1068:2,12	920:25
1045:3	933:14,20	946:3,10,15	1011:3,13,15	justify 1054:25	922:11,24
JD 911:16,20	934:7 936:19	948:4 949:3,6	1014:18	justifying	927:20 928:5
912:4 927:13					

932:17	1065:10	learning 927:4	1046:4	1016:2	long 910:6
933:17	knowing	leave 918:21	1065:7	1020:21	921:24
937:22	1032:13	919:2 921:18	lied 1036:15,15	1025:21,22	935:13
940:10	1037:20	997:7,8,9	life 908:24	lipstick	958:15
942:22	knowledge	1020:4	926:13	1020:20	961:22
943:15	922:19	1022:15	962:17	list 0:2 977:20	982:12
945:17	known 918:10	1046:13	983:20	984:10	998:15
947:19	918:11 941:2	1066:16	lifted 1053:11	991:14	1010:12
948:17 949:8	941:3 1053:2	leaves 977:21	1053:20	listed 1013:18	1012:9
951:6,12,15	1064:4	992:18	light 907:23,24	listen 927:15	1018:19
954:13 956:3	knows 1010:17	1058:9	942:10	957:22	1024:9,13
958:24	1010:20	leaving	964:22	966:10	1051:9
972:11,13	1067:6	1018:14	1033:6	994:21	longer 998:23
978:2,11	knuckles	Lee 959:4	1038:14	listened 1025:3	longest 921:25
990:9,12	967:21	left 928:7 930:3	Lily-Rose	listening	longstanding
991:23 992:3	Koo 1014:9	930:5,12,18	1023:18	1021:11	1008:24
992:15		930:22 931:2	Limited 0:11	litigate 982:14	look 900:24
993:24 994:2	L	940:13 945:6	0:14	little 927:5,21	910:24 911:8
1005:17	labelled 926:23	949:21	limits 1060:16	935:10	915:21
1008:14	lack 1054:17	950:15,23	LINDA	966:14	919:21 923:8
1009:9,14	1054:18	951:10	1048:13	970:17,24	925:7,17
1011:6,10,11	1059:8	995:25	line 915:18	1017:9	926:9,22
1012:11,14	lady 1053:24	996:17	929:12	1028:18,19	933:11
1012:15	1053:25	1017:10	930:11	1055:22	949:20 953:6
1013:3,10,20	1054:7	1044:16	931:22	1060:10	963:17
1013:20	landscape	1048:17	933:14	1067:16	972:22 974:4
1016:8	910:24	1058:11	936:18,25	live 922:5	977:10
1017:12	921:20	1059:4	940:12	961:6,8,10,12	992:19
1018:17,20	Lane 0:14	1060:2	988:18	961:16,18	993:13
1018:23,24	large 900:9,14	left-hand	1012:22,25	962:23	1001:3
1019:2,3,4,14	904:15	1007:10	1018:25	974:19 998:7	1002:20
1019:19	950:15	1008:8	1040:20	998:9,10	1004:3,23
1020:9	1021:7	1011:19	1054:21	1056:14	1005:7
1022:12,16	1048:17	1012:6	lines 938:23	lived 961:22,24	1006:24
1022:18	1063:19	1015:8	940:13	1056:7	1007:10,23
1023:14,16	larger 1052:21	legal 913:10	983:11,18	livelihood	1013:24
1025:18	late 902:14,21	929:15	984:7 996:14	954:10 962:5	1016:21
1032:11	910:4 986:8	935:23	1005:14	962:14	1022:8
1034:13	1045:3,3	legitimate	1021:25	974:17 975:9	1032:25
1035:3,13,17	law 974:24,25	982:23	1063:18	living 962:18	1035:15
1035:21	984:20,24	lengthy 958:12	link 956:3,8	1064:14	1038:13
1037:18	985:20 986:4	lettered 950:2	957:3 976:4	Liza 1022:7	1042:15
1046:16	986:9,17,25	977:3	995:4,12,14	Lloyd 966:21	1044:21
1050:20	988:8	letting 1037:4	1015:5	locate 933:21	1048:16
1052:6	laws 0:17 985:6	level 984:9	1048:4	log 911:13	1064:23
1053:23	lawyer 985:21	1051:10	1065:17	logistically	looked 909:6
1054:5	986:5	lie 920:11	linked 1023:24	904:21	971:4
1057:8	lead 982:24	921:6 954:15	lip 1002:4,7,23	London 0:4,14	1000:21,24
1058:6,10	learn 924:22	1009:13	1003:3,7,24	957:22	1003:19
1059:6	learned 924:20	1036:11	1015:24	995:15	1025:7

1029:24	1030:12	996:17	1054:23	950:15,15,18	989:4 991:24
1036:6	1031:7	losing 975:8	1055:3,24	970:3 1002:3	992:8,10,15
1040:6	1039:5	lost 963:2,5	1056:3,6,9,13	1002:7,11	994:19
looking 931:10	1040:25	1036:4	1056:16,25	1003:5,7	1042:9
968:24	1041:11	lot 904:5	1058:5,7,23	1020:21	1043:22,25
996:19	1042:5	928:16	1059:6,15	1027:3,5,6,14	1044:10,16
1000:13,23	1044:7,20	930:15	madam 1057:8	1028:19,21	1054:18
1033:13	1047:2,6	942:18	1058:10	1029:8	1060:18,19
1040:25	1051:25	945:16,16	maintain	1065:3	1066:2
1045:19	1052:2	949:9 981:9	1030:15	marked 959:18	matters 903:10
1059:21	1059:25	1022:7	makeup 974:7	996:2,4	903:14,18
looks 1001:8	1060:6	1055:17,20	1003:22,23	1000:6	905:5 906:12
1001:17,21	1063:8	1056:24	1020:10,12	marker	942:16 976:6
1003:5	1066:2,14,20	1057:7	1020:17	1059:25	976:16,23
1027:2,7	Lord's 966:11	1058:24	1021:14	markers	978:21
1045:17	Lordship	loud 900:10	1030:20,22	1067:18,18	984:25
Lord 900:3	904:3,7,13,17	love 911:20	1033:7	1068:2	1040:8
901:12,18	905:18,20	939:24 975:9	1037:21,24	marking	1044:19
902:7 903:6	909:10	984:8	1045:19,20	1001:18,22	1066:6
903:12,23	942:22	1023:11	1057:18,20	1015:21,24	May/June
906:16,18	954:19 956:3	low 984:9	1058:12,13	markings	910:4
915:9 931:5	959:7 976:24	lower 1002:4,7	1058:18	1015:19,22	McMillen
934:21 935:8	977:3,6,11,14	1002:23	1064:25	marks 1003:18	994:12,13
936:6 938:11	977:24	1003:3,7	making 934:25	1003:24	995:1,2,5,8
942:17 943:6	978:16	1024:12	942:21 957:7	1015:17	995:10,11
943:11 949:5	981:18,24	loyal 1009:14	976:21	1026:6	996:1,6 997:1
949:8,12,24	982:14,20	1009:15	1067:24	1030:2	997:4 998:1,3
950:6 956:2,6	988:25 989:5	loyalties	Malcolm 900:3	1033:10	999:1,12,21
956:10	989:11	1008:21	900:5,13,18	1038:3	1000:1
964:14,20	991:25,25	1009:4,5,13	900:22 911:9	1057:17,19	1001:1,19,25
965:6 967:17	992:3,10,15	loyalty 1009:6	945:25 946:9	marriage	1002:1
976:2,9,13,22	993:23 994:3	1045:23,23	malicious	979:16 980:4	1003:1,14
976:23 979:3	996:24	1045:24	922:7	982:13 985:3	1004:1
980:24 983:4	1009:25	1046:3	man 922:5	988:6	1005:1,6
983:10,21	1010:5	lunch 993:17	923:20	married	1006:1,11
986:5,10	1034:16	lying 950:11	953:25 954:3	982:13	1007:1,5
987:8 988:11	1039:6,21	975:10,12,12	963:8,14	983:13	1008:1
990:17 991:4	1041:25		973:6	Marten 0:14	1009:1,12,24
991:10	1042:18	M	management	massive 916:21	1010:1,5,24
992:14 993:6	1045:7,9	ma'am 1050:5	942:20	master 1051:14	1011:1,6,17
993:16,20	1046:16	1050:7,11,14	manager	material	1012:1
994:11	1066:3,7	1050:16,19	915:18 961:3	902:16,20	1013:1
1001:11	1067:2,13	1050:23	1054:21	903:22 936:8	1014:1,24
1005:4	1068:8	1051:2,12,17	managers	materials	1015:1
1009:19	Lordship's	1051:19,21	943:3	927:3	1016:1,16,19
1010:15	903:23	1052:9,11,13	marble 924:6	matter 902:23	1017:1,20
1014:22	991:14	1052:15,20	March 901:22	905:17	1018:1,2
1018:8	993:25	1052:22	903:4,5,10	934:24 936:6	1019:1
1019:8	Los 952:3	1053:7,13,22	926:10	954:3 977:6	1020:1
1027:16,18	976:4 995:15	1054:14,20	mark 919:25	987:12,15	1021:1

1022:1,17,21	1039:12	1051:15	1044:25	1057:5	N 0:21
1023:1	meant 1030:11	met 1022:25	1045:5	months	Nail 1024:14
1024:1,23	MEDIA 0:2	1023:2	1059:20	1036:25	name 900:12
1025:1,4,15	medical 966:3	microphones	1063:11,12	1056:20	959:3 995:8
1025:19	966:25 967:7	959:9	minute' 946:17	morning 900:2	1005:14
1026:1,9,17	967:16	middle 910:20	minute.'	907:23	1007:11,16
1027:1,14,23	1036:20	910:23,23	946:24	934:23	1012:14
1028:1,6,7,11	medication	917:20	minutes 902:4	935:24 936:9	1047:10
1029:1,5,15	918:6,6	922:14	916:2,3,3,12	939:21	narrative
1030:1,23	medics 967:9	935:16,18	923:19	940:25 958:8	1014:21
1031:1,6	meet 966:18,21	939:7 984:7	930:23	958:9,10	Nassau 962:4
1032:1,3	meeting 981:19	1005:7,8	934:23	975:18	Nathan 907:4,8
1033:1,13	1037:6	1012:3	935:11,14	976:10	907:9 944:11
1034:1,18	Melanie	1016:12,22	956:4	1019:12	944:15
1035:1	1020:17,19	million 979:11	1041:25	1041:16	nature 1010:19
1036:1,9,16	member 943:2	980:9 984:16	1046:19	1048:9,10,14	navigate 927:4
1036:19	947:17	mind 989:4	misconceived	1048:15	necessarily
1037:1,16	members 907:3	1011:24	981:6 982:6	1050:9	941:2 985:12
1038:1,22	907:5	1024:15,18	misheard	1054:12	998:12
1039:1,10,11	memory	1039:7	947:12	1056:2	necessary
1039:16	1033:20	minds 1036:16	missed 930:19	1067:14,14	933:21
1040:1,19,19	1034:12	mine 1001:9	931:11,13	1068:13	978:13,14
1040:24	1038:9	miniature	1030:7	mother	999:13
1041:1,21	men 1023:16	1063:7	misunderstood	1022:25	neck 940:7
1042:1,2,3,17	1023:17	minute 907:25	980:16	1023:8	need 901:16
1042:19	mental 1036:20	909:9 914:5,9	moment	1024:8	913:2 923:19
1043:1	mention	918:24 919:9	901:17 906:9	1025:16	927:19
1044:1,21	1005:19	920:9 921:18	914:7 915:5	1033:23	932:18 933:2
1045:1,6,16	mentioned	924:2,16	920:16	motivated	935:2 953:3
1045:22	908:8 949:15	925:11,22	929:25 938:7	980:21	953:21 972:5
1046:1,7,10	989:15	932:11,24	939:9 946:15	motivation	975:9 977:12
1067:4	mercy 984:7	938:2 941:4	946:16	979:6	982:19 986:2
McMillen's	mere 981:25	944:24 945:2	949:23,25	motive 979:22	986:25 988:9
1014:19	mess 919:23	945:21,25	959:24	mouth 1045:11	988:20,25
MD 1005:15,17	message	946:3,9,10	966:16	1045:12	989:2 992:24
1007:25	952:19	948:7 954:9	972:25 975:6	mouthful	1008:12
mean 904:20	1005:22	958:19	976:18	1044:22	1012:20
911:18 921:2	1006:23	966:12	978:10,16	move 915:4	1024:22
922:23	1008:6,8	972:23	981:14	945:4 949:5	1028:25
933:17	1014:16	979:17 983:7	983:24 991:5	949:12	1035:15
961:14	1019:16	983:16,16	994:17	959:10 963:5	1041:8
962:16 969:3	1023:12,15	984:2 986:13	999:12	972:5,6	1042:23
969:14	1024:10,13	1001:24	1003:20	1017:25	1048:18
989:20	messages 952:7	1006:8,10	1034:22	movie 920:15	needed 910:16
992:21	952:10	1016:14,16	1042:14	Muirhead 0:19	986:14
1009:23	1008:4,5	1017:6	1068:11	Murphy	needing 910:13
1054:7,11	1023:5,20	1020:12,24	money 980:17	1054:19,21	needs 906:11
means 905:9	1033:21,24	1020:24	980:21 989:6	music 1054:3	919:13
906:14	1033:25	1021:22	Monroe 1022:8		927:18
959:11	messy 1051:13	1034:15	month 967:15	N	959:10

1009:25	nickname	967:18	1025:3,8,11	nod 999:17	1016:17
1045:7	1023:13	970:14	1026:12,17	nodding	1021:20
1067:13	NICOL 0:7	971:13	1026:24	999:13,15	1022:24
negotiated	900:2,7,9	972:23,25	1027:23	non-stop	1023:24
990:6	901:15 902:5	973:4 975:2	1028:2,7,25	1022:6	1026:20
negotiating	902:22 903:2	975:15 976:5	1029:4,7	normal	1036:14
985:11	903:5,8,17	976:10,15,18	1030:9,11,18	1043:20	1040:17
negotiation	904:5 905:4	978:19,24	1031:8	1045:17	1042:6
985:12,24	906:6,9,17,19	979:2,17,25	1032:21	1068:10	1048:17,18
never 911:16	907:5,25	980:6,10,23	1034:15,17	normally	1048:19
912:5 913:22	909:9,15	981:14 983:3	1035:14,19	1066:15	1049:3
914:6,8,11,15	910:14 911:5	983:7,9,16,24	1036:17	nose 969:7,10	1052:23
915:5 918:9	914:5,7,9	984:2,5,14,19	1037:13	969:11,13	numbered
918:10,11	915:5,8,10	984:22 985:5	1039:3,14	1019:18	950:8 959:22
919:5 924:4,7	916:8,23	985:8,14,21	1040:2,19	note 909:10	1001:10
937:11	918:24 919:9	985:25 986:7	1041:8	914:10	numbers
940:12 941:3	919:12,16	986:13,16,24	1042:2,12,19	966:11 991:5	900:25
943:19,24	920:9,16,22	987:6,13,15	1043:18	996:24	1000:10,11
948:18	924:2,16	987:18,21	1044:3,10,13	notes 0:13	numerous
962:18 963:8	925:11,22	988:3 990:16	1044:18,25	967:16	904:23
963:14	926:2,12,15	990:18 991:5	1045:5,8,10	976:19	nurse 966:21
969:19 973:6	926:21 927:7	991:12,15,19	1046:10,18	notice 902:9,14	1008:15
973:8,14,16	927:18,21	992:5,11,21	1046:20,22	1021:15	1022:10
980:24	929:25 931:3	993:3,9,14,17	1046:24	noticed 926:4	1023:4
981:15	932:11,24	993:19,22	1047:4,7,9,12	931:3 1004:2	1035:10,12
984:12	933:5,8 934:6	994:4,6,10,13	1048:5	1018:4,6,8	1035:23,25
1003:10,18	934:10 935:4	994:15,21	1052:3,18	1030:16,18	1036:2,5,6,8
1005:19	935:9,13,16	995:5 997:10	1055:8	November	1036:10
1008:20	935:22 936:2	999:12,16,20	1057:11,13	979:13	nurses 1022:11
1018:4,6,8	937:17,19	1001:9,14,19	1059:20,23	number 900:14	
1053:2,4,14	938:2,4,7,10	1001:24	1060:4,15,21	900:15 904:7	<hr/> O <hr/>
1055:4	938:12,14	1002:22	1063:11	904:15	O 0:21
1058:11	939:9,17	1003:13	1065:14	910:17,18,23	o'clock
1060:23,25	941:4,7	1004:12	1066:11,18	911:13	1005:23
1061:3,10	942:15 943:7	1005:5	1066:21	921:17,18,19	1068:12
1064:4	943:9,14	1006:8,10	1067:7,10,16	936:20	oath 913:11
1065:4	944:13,24	1007:5	1067:23	952:11,11,14	1047:13
new 904:2	945:2,21	1010:14,24	1068:2,12	952:16,17,18	1065:7
905:11 913:7	946:3,10,15	1011:3,13,15	night 938:25	952:18	object 902:13
936:8 982:16	948:4 949:3,6	1014:18	939:8,12,19	953:17	objection
newly 903:4	949:11,13,23	1016:10,14	939:22	959:19	902:5 977:18
news 0:11	949:25 950:5	1016:16,19	1003:11	973:22 976:6	977:19
958:19	950:7 951:25	1017:6,19,23	1017:2	995:11,13,25	objects 964:5
976:25 977:2	954:9,20,23	1017:25	1020:6	1000:6	1061:9,11
newspaper	956:5,7 957:4	1018:7,10,20	1021:14	1004:7	observation
934:17	957:6,10,15	1019:5	1024:12	1007:5	932:16
NEWSPAPE...	957:18,21	1020:12,24	1035:22	1008:11,19	1067:24
0:11	958:4 964:19	1021:16,22	1054:11	1009:22	observations
nice 900:10	964:24 965:7	1022:15,19	1057:2,24	1012:9	992:14
nicest 978:5	966:12,16	1024:22	nights 1062:10	1013:18	observe

1060:16	1024:8	ought 923:6	1004:23	908:11	967:21
obtained 986:5	1026:16,23	1042:17	1005:23	917:20	pattern 948:16
986:7	1027:13	1043:10,22	1007:2	920:24	953:4
obviously	1028:8	1044:17	1013:16	932:24	patterns
910:6 937:8	1032:22	1060:13	1014:20,24	964:12 967:8	947:21,22
940:17	1038:25	1066:4	1015:5	968:6 972:20	pause 907:25
985:13	1048:22	ounce 984:8	1016:15,17	975:2 982:25	909:13
990:10	once 984:8	outside 916:20	1016:22	983:2 985:16	910:16,22,24
995:13	1045:19	919:20	1023:24	987:23 988:8	914:5,10
1009:14	one-off 951:24	924:17 925:9	1024:3,12,21	991:2 1021:2	916:8 918:24
1042:9	953:17	945:24 947:5	1024:25	1027:8,9,11	919:9 920:9
1054:25	ones 982:6	981:8,22	1026:11,14	1030:7	924:16
1067:20	1030:5,13	outstanding	1045:7,12,13	1033:11	925:11,22,23
occasion 922:9	ongoing 916:14	976:6 1067:9	1049:3	1038:4	926:14,19
934:25	onions 920:12	overnight	pages 900:24	1040:11	927:2,20,20
968:12	open 910:17,18	1041:23	910:20 939:4	participant	929:25 938:7
occasions	919:20	oversight	1048:25	1012:5,5,6,7	939:9 941:4
989:7	921:18	1039:17,18	paid 962:23	1013:18	944:24 945:2
1041:12	992:12 997:7	1040:11,12	Paige 1022:25	1014:16	945:21
occupation	997:8	1041:7	1022:25	1022:2,23	949:25 954:9
998:4	1045:12	1042:13	1023:5,6,20	participants	963:3 966:12
occurred 931:2	operating	1043:10,24	1024:3	952:25	966:16
offer 976:21	916:6	1044:5,8	pain 945:16,17	1006:24	972:23,25
1020:3	opinion 984:23	owned 1050:13	painful 921:13	1007:25	975:6 976:19
offered 954:12	1053:21	owners 943:3	paint 918:15	1013:17	979:17
office 947:25	1059:17		924:10	1014:25	981:14 983:7
1022:7	opportunity	P	pale 1057:22	particular	983:16 984:2
officer 947:16	903:11 925:7	P 0:21	paper 927:2	987:10	984:6 987:11
948:4	934:21 935:6	p.m 976:4	1001:13,13	991:23	991:5,16
oh 969:18	987:22	1005:9,24	paragraph	particularly	1001:24
1001:9	990:20 993:7	1054:9,10	963:11	939:23	1006:8
okay 933:13,19	1010:22	pacifying	968:24	944:15	1017:6
943:7 957:13	1042:15	947:20	972:22 973:4	995:14	1020:12,24
958:7 959:14	1043:5,11,16	page 900:19	973:5 974:4	1021:13	1021:22
960:7 966:10	1043:23	910:23,25	983:10,15,17	parties 931:17	1026:13
966:15	1066:15	911:7 927:9	983:18	990:13	1028:5,8
980:23	oral 993:3	927:12 929:6	996:14	parts 950:22	1034:15
987:21	order 929:4	929:9 930:11	1032:25	party 914:21	1042:14
995:18,23	934:16 943:4	931:21,22	1033:15,18	981:24,25	1044:25
996:3 1000:7	979:5,8	933:11,12	1034:2	987:10	Pausing 922:8
1000:9,20	981:16	936:21,25	1036:24	992:22	payable 979:12
1004:10,21	983:13	938:2,4,23	1037:22	passage 930:7	paying 943:4
1004:21	1066:7,13,23	939:4,5,25	1040:23	939:25 940:3	pays 962:8
1005:3	ordered 978:15	940:2 949:22	1044:2	951:9 967:11	Pennington
1006:20	982:4	950:8 959:25	1063:15,18	1041:2	1013:20
1007:9	ordinary	966:11,16	paragraphs	passages	1014:11
1008:6	1055:13	967:19	1040:15	950:24 965:5	1015:2
1014:13	Orient 943:13	983:23 984:2	parallel	988:21	1016:12
1015:6	original 903:19	984:11	1013:24	passing 944:21	1017:7
1021:21	1027:18	1000:10	part 905:2	patient 967:20	1056:5,7

1050:13	1002:15	1016:3,5	940:25 949:7	1013:11	986:19 990:8
1056:15	personal	1024:24	950:22	1016:9,16	990:12,15
penthouses	968:10	1025:16	964:17 970:5	1017:19	992:6 998:11
1056:7	1055:6,14,14	1027:17	974:19	1019:6	1059:11
Pentonville	persuade	1029:11	1004:22	1020:24	1062:3
947:16	918:25	1032:9,12	1051:22	1021:4	possible 970:12
people 920:6	persuaded	1033:17	1053:18	1022:14,20	978:5
930:15	992:25	1038:5	1066:10	1024:3,17	1027:20
939:18	Peru 954:12	1054:24	plain 923:6	1026:8	possibly
949:10	PH3 1051:10	1059:2,3,6	1031:6	1028:5	932:18 933:2
961:16	phone 951:2,7	photos 1015:25	planned	1029:14	1003:4
966:13	1008:5	1032:7	1037:3,7	1041:10	post-nuptial
1004:7	1014:16	1033:14	platform 924:6	1045:5	979:18
1014:16	1023:22	physical	play 927:19	1048:11,19	potential 920:6
1033:24	1024:5,6,7	948:18	played 927:23	1051:24	976:17
1059:14	photo 973:25	1060:23	945:5,7	1059:20	PR 981:8,22
people's	974:13	physically	pleaded 902:25	1061:17,23	1035:3
947:23	989:17	953:24	903:4,18,22	1063:11	practicalities
perfectly 982:2	1001:21	973:21	905:2,5	point 903:8,17	904:14
1010:19	1002:5	pick 982:5	978:12	903:18,23	pragmatic
1063:5	1003:6	picked 928:7	980:11 981:2	905:4,13	977:22
perform	photocopy	picking 958:12	981:3 982:17	912:13 940:6	pre-nup
1054:16	937:21	959:9	989:23,24	964:24	979:18
period 967:14	photograph	pics 1024:6	990:2	973:18 981:4	precision/coo...
979:13 980:4	949:20	picture 970:20	pleadings	982:8 987:4	940:8
980:8 985:18	969:17,18,19	970:25 971:2	902:11 903:3	988:20,22,22	predictive
periphery	969:20	990:2 1001:3	903:10	1043:9	911:19
983:2	970:14,15	1001:17	please 900:12	1067:9	prefer 957:12
perjure	971:10	1024:25	910:11 914:7	pointed 912:25	957:16,16,19
1009:10	1000:14,16	1026:11,24	914:9 916:8	1052:7	966:5 994:19
perjury	1000:18,24	1027:4,19	921:17	points 901:15	1014:22
1009:12	1001:5,6,11	1029:23	922:14	904:25	1027:22
1046:5	1002:3,6,8,14	pictures	925:22,22	944:10	1042:7
permission	1002:21,23	1023:10,19	927:12,22	1066:22	preferably
901:12	1003:2	1024:4,5,11	929:6,25	police 1008:14	978:12
903:13	1015:14,18	1025:5,6,7	930:11	polish 1024:14	premier 996:20
977:15	1027:14	piece 933:16,21	939:25	Poor 1017:12	premises 946:2
986:14,16	1028:2,8,11	933:25 964:9	953:13	Pope 954:6,7	947:2
1043:12	1028:13	pieced 988:24	957:22 959:7	portion 927:16	1051:13
permit 975:6	1029:2,4,9,17	piecemeal	959:13	portrayed	preparation
permitted	1044:21	1042:7	963:10	964:23	904:14
904:10	photographed	pieces 989:3	972:25 973:2	980:19	prepared 0:22
perpetrated	1058:8	pile 1052:8	989:18	981:11	1066:7
980:13	photographic	1063:19	994:11,21	position 906:7	preparing
person 1020:17	1001:12	Pistol 1052:16	995:9,20	934:12	904:21
1022:15	photographs	1052:19	1000:5,8,13	962:22 977:2	1033:5
1030:25	970:12,13	place 910:7	1004:11	977:5,8	prescribed
1054:22	981:15	913:17,20	1006:3,8	978:20	918:6
1055:12	1003:19	914:20	1007:23	979:10,14,21	presence
person's	1015:11	916:10	1011:14	985:4 986:10	932:14,15

904:18	988:18	1066:6,12,13	981:6,12	1028:4	958:15 960:4
906:23 908:9	989:14	provisions	982:18	1037:4	976:22 980:7
922:17,18	992:12	984:23	989:15 990:2	1040:10	1002:23
934:7 940:14	1009:21	provokes	1004:12	1042:11	1039:8
949:6,8	problems	902:19	1011:5	1045:25	1044:22
press 977:7	953:21	pry 962:17	1020:7,20	1049:10	1059:23
979:4 980:19	1054:22,22	psychological	1028:22,23	1051:24	1067:3
991:22	procedure	948:17	1028:24	1052:18	
992:20,23	916:6 956:4	public 913:19	1029:18	1055:19	R
993:3 1016:3	process 904:22	publicist	1041:6	1056:19	R 0:21
1043:21	967:5	1035:4,5,6,8	1042:10,12	1057:13	raise 906:2
pressed 974:18	1066:24	pulled 1025:23	1042:17	1058:15	946:6 958:25
pressured	production	1063:18	1044:7	1060:22	1019:3,7
954:15	948:15	punch 967:17	1053:12	1061:17,23	raised 901:21
pressurised	professional	1013:25	1058:14,17	1063:13	903:15
934:15	911:17 912:6	1061:11	1059:10,25	1065:5	904:12,16
presume 953:3	professionali...	punched	1060:9	questions	976:24
pretty 1012:22	909:7	908:22	1066:4,6,22	900:11	982:10
1013:8	programme	967:21	putting 901:16	901:13,23	1054:22
1016:22	1016:25	punches 939:7	910:15	902:3 904:11	ramping
previous	progress	940:3	932:13	906:10,21	1024:18
1001:17,21	966:23 967:2	purely 1041:21	988:23	908:5 927:16	range 1002:24
printed 959:23	983:13	purpose	1010:22	934:22 935:3	1033:7
959:23	1067:19	982:22,23	1021:10,13	942:4,5,12,19	ranting 922:12
991:19	projected	999:4	1060:2,13	954:19,20	Raquel 1056:4
printing	1028:3	put 902:21	1067:17	958:5,19,20	1056:7
1005:23	prominent	903:11,21		960:17 972:5	rational 917:17
printout	1029:19,24	904:2,3,22,24	Q	975:14,15	917:18
976:18	promise 1024:8	904:25 905:9	QB-2018-006...	982:9 990:7	re-attend 991:8
1005:6	properly	905:11,23	0:1	995:6 997:6	re-examinati...
prior 935:23	918:17	907:10	QC 0:17,19,19	1025:4	902:19
priority 1009:7	995:21	910:11,12	quality 0:14,14	1031:7	942:15
prison 948:4	property	912:13	1001:11	1032:4	1042:14
948:16	965:24	915:20	1027:17	1035:12	re-examine
prisoners	1056:4,22	919:24	1028:13	1036:14	1039:20
947:19	1057:23	920:14	QUEEN'S 0:2	1038:23	1043:5
private 908:21	propose 977:14	926:11,12,13	question 926:2	1043:6,11	RE-EXAMI...
961:3 966:24	977:21	931:25 932:7	927:8 931:19	1044:4	942:2 972:2
968:10	propositions	933:16,25	946:22	1046:8	1032:2
privy 918:9	988:15	937:15	951:25	1048:6	1063:2
probably	protect 911:24	942:13,13,16	959:13 975:7	1049:14	reach 1008:5
911:18 913:2	920:15,15	942:17,23	978:2,7,8,10	1062:11	reached 991:2
923:23 932:9	948:15,16	945:12 949:9	992:21 994:2	1063:3	reaction
959:15	protection	949:15	996:12	1064:7	1023:22
976:13	909:7	950:20	999:13	1065:12	read 911:12
980:24 988:3	prove 1054:24	953:22	1002:10	quickly 1020:4	922:22
1013:14	provide 978:9	954:14 958:4	1010:4,19,24	quite 904:5	963:10 966:4
1032:17	982:4	963:18 970:8	1011:2	909:12	966:8 967:11
problem 957:9	1041:12,21	976:22,24	1013:6	943:14 946:5	967:16
988:12,13,17	1042:22	978:15 980:8	1024:22	954:2 958:12	972:20

983:23	1039:22	1028:18,19	905:6 977:16	1045:18,19	1058:19
993:12	1041:15	reddening	982:17	remembering	requesters
1014:3,14	recall 901:25	1002:18	1032:4	913:19	992:23
1019:10	916:5 922:18	1025:2	1039:16	remembers	requests 982:3
1023:3	924:25	1028:16	1067:4	942:22	require 991:8
1024:13	989:16	1030:5,14	relationship	remind 972:25	required 940:8
1035:16	1017:5	refer 990:4	934:13 968:6	981:24	respect 911:15
1036:16	1021:16	1038:17	988:6 989:8	983:21	911:20
1042:24	1051:8	reference	998:20 999:3	1007:2	964:14
reading 967:16	1057:5	911:5 984:11	1006:7,13,14	1026:20	981:21
reads 922:6,12	receive 987:16	1024:7	1008:24	1035:14	999:25
939:12 940:3	received	1062:4	released 922:7	reminded	1009:19
1008:11	943:25	referred	relevance	982:20	1013:6
1019:16,18	982:15	944:17	978:8,17,20	reminding	1054:17,18
1023:6	987:11	965:14	relevant	999:16	1059:8
ready 993:24	receiving	968:12 981:3	905:16	remove 946:2	respected
1048:22	903:25	982:17	980:18 985:3	removed	912:14
real 978:8	recognise	1034:5	987:12	917:22,23	respectful
1008:12	927:24	1043:25	1040:3	946:25	911:17 912:5
realise 1060:4	recollection	referring	remain	renting 916:11	respond
really 905:19	905:25	911:10	1064:10	reparation	901:17
910:8 911:15	907:13,15	923:21	remainder	942:21	953:20
911:23	913:25	1040:15	1023:23	repeat 926:2	1039:11
968:12 977:6	915:12 919:9	refinements	remained	926:17 946:5	response 953:9
982:8,19	920:8 928:22	984:16	928:12	957:23	976:7 999:13
984:22	934:2	reflect 933:3	983:21	994:23	999:17
991:24	recollections	1041:13,22	remaining	1001:20	1017:9
992:18	913:7	1043:11	929:22	1017:19	1038:24
1019:17	reconsider	reflection	remains 970:2	1019:5	1041:19
1020:20	929:21	1042:17	1033:20	1046:11	responsibility
1022:6	reconsiderati...	refusing	1038:9	1052:18	1060:16
1023:17	1068:6	918:21	remark 931:4	repeated	rest 1027:10,11
1040:20	recorded	regard 1061:4	remedied	1010:6	restraining
1056:14	919:14 928:5	1061:16	993:15	1051:24	979:5
reason 948:17	969:17	regarding	remember	1052:2	result 934:22
968:9 989:19	recording	901:24	906:21,24	repeating	943:21
1009:11,16	926:10	regards 990:13	912:2 915:25	1011:24	1035:18
1009:17	927:23 928:5	registered	919:4,6	replied 1014:8	1039:23
1010:18,21	928:6,6	1036:5	944:12,16	reply 1017:7	reveal 967:10
1011:6,11	933:22,22,23	regular 1055:7	945:7,13	reported	right 900:14,16
1013:7	945:5	1055:9	950:24	1054:18	902:15,23
1016:5	1035:23	regularly	973:25	representing	904:9 905:17
1019:20	recounting	908:19	977:24	958:6	913:23 916:7
1025:15	1017:8	1058:8	993:13	represents	916:9 917:20
1031:3	recreational	rehearsed	1000:23	995:6 1043:5	918:21
1036:10,13	918:8	903:7	1018:7	1048:7	926:10,23,24
1046:5	red 910:11,17	relates 967:12	1020:19,22	request 906:13	927:3,7 929:6
reasonable	949:21	relating 901:13	1021:13	1058:17	931:16 934:8
982:3	1020:20	951:9	1032:9	1066:14	936:2 939:8
reasons 977:17	1027:3,5,6,14	relation 904:11	1035:10	requested	943:14

945:22	1007:4	rooms 992:7	1003:10,18	932:12,16,25	930:12,14,18
949:11,11	rightly 982:20	roughly 930:23	1003:22,23	937:5 938:21	930:21,25
950:5,15,16	riot 947:19	round 989:24	1003:24	938:22	931:7
950:17 956:7	rise 956:7	1039:14	1011:21	939:17 951:4	screamed
957:18	1041:8	routine 1050:8	1015:18	951:5,11,13	908:24
959:24	1046:16	1050:15,18	1024:5,6,10	953:10	screaming
963:16,20	rises 1041:25	1050:25	1025:25	981:16	925:10
965:8,22	1066:3	row 1007:24	1026:2,4	983:11,15,19	screen 970:13
967:21,22	rising 956:4	1012:3	1028:16,21	989:7 996:17	1027:21,23
968:14,19,21	Roberts 956:2	Royal 0:3	1029:12,18	1003:14	1028:4,23
969:16,23,24	956:11 957:1	ruckus 916:21	1030:16,21	1004:23	1029:15,18
970:3,6,9,17	957:2,4 958:1	rule 904:18	1033:5,19	1005:8	scum 984:12
970:18 971:9	958:2,4,8,9	1037:3	1038:8,10	1006:3,24	seating 1021:6
978:19	959:1,3,4,5	rules 902:17	1045:20	1007:13,24	seats 992:7
980:23	960:1,2,13	ruling 987:22	1057:17	1008:8	second 903:11
983:18	961:1,3 962:1	run-up 981:9	1063:19	1009:22	909:13
987:14	963:1,20		saying 904:23	1012:2,18	932:24 951:9
990:13,18	964:1 965:1,8	S	912:21	1013:18,25	953:3,10
993:14,17	966:1,13	s 0:21 1038:23	915:25 916:2	1014:3,6	968:4 972:3
994:6,21	967:1,9,23	sad 922:13	916:9,16	1015:8	975:2 983:5
996:20 999:3	968:1 969:1	963:2,4	922:4 928:20	1016:12	988:20
1001:5	970:1,18	safe 1008:11	929:25	1017:8	1010:5
1002:13	971:1,11	safety 921:15	933:20	1022:2,4	1024:16
1004:9,21,24	972:1,3 973:1	Sam 996:6	937:10,12	1023:10	1045:6
1005:24	973:11 974:1	Samantha	945:18,22	1024:13,19	secondly
1007:19	974:16 975:1	994:12 995:2	947:24	1036:3,11	901:24
1011:11,14	975:11,13,15	995:10	951:15,18	1039:6,21	902:15
1013:4,17	1040:18	1040:24	953:12,20	1040:9	seconds
1015:22	1041:16	SASHA 0:19	958:13,16	1067:2	1005:24
1023:6,15	1042:5	sat 925:9	959:6,6,7,12	scalp 1002:18	secretly 973:12
1025:10	Rock 1013:18	1067:16	976:7 986:16	1024:25	section 910:20
1026:19	1014:2,3,6,25	satisfactorily	989:17,24	1025:22	936:14 940:2
1027:3	Rock's 1012:25	956:8	995:16,22	1036:6	1002:13
1028:2	Rocky 1008:15	save 1019:10	1003:18	scared 975:8	1025:7
1041:2	1008:18	saw 904:20	1004:5	scathing	security 907:10
1044:3,18	1013:20	914:11 915:5	1007:3	1023:12,15	915:16 916:9
1045:7	1014:11	918:12	1009:14	scenario	919:2 942:19
1046:24	1015:2	919:12,23	1017:2,10	1025:19	942:25
1047:5	1016:11	928:2 931:4	1018:15	scene 928:24	see 900:14,17
1050:6	1017:7	937:12 963:8	1020:19	schedule	900:21,25
1051:9,23	role 904:19	963:14 964:6	1027:5,6,7	910:20	904:20
1052:7	room 900:9	964:7,8,9	1040:8	921:20,24	905:19
1055:25	953:13	965:25	1062:9	983:23 984:3	910:17 911:8
1057:9	1017:10	967:25	1068:3	1041:12,22	911:10,21
1060:6,21	1020:11,23	972:15 973:6	says 900:22	1062:6,9	915:2 919:25
1067:7	1020:25	973:8,14,16	911:12,18	1066:6,7	921:20,24
right-hand	1021:2,6,11	973:21	919:18	Schillings 0:18	923:8 924:5,8
900:25	1046:13	974:13	923:17,18,19	scraped 967:20	924:10,13,17
927:10 950:9	1058:25	992:23	927:9,12	scratches	925:15,23
952:5,6 960:4	1064:14	1000:21	930:11,13	925:15,19,23	927:12,15

928:16 929:9	1012:2,5,17	944:7,8	1035:16	906:20 907:1	1030:19
929:12	1012:18,20	952:20,20	separate	907:8 908:1,2	1031:8
931:23	1012:23	965:4,10,16	987:15	909:1,10	1032:2,3,23
932:11	1013:14,24	972:9 973:11	1018:15	913:12 935:4	1033:1
933:14	1014:2,3,20	974:14,15	1056:24	935:8 939:14	1034:1,16,18
936:18	1014:24	977:10 981:9	separated	939:16 941:7	1035:1,15,20
937:10,12,14	1015:7,14,21	988:16 992:5	910:4 1057:4	942:2,3,15,17	1036:1,18,19
939:2,4 940:4	1015:24	999:5 1030:4	separation	943:1,6,8,11	1037:1,14
942:6,20	1016:13,21	1030:8,12	910:7	943:16 944:1	1038:1
943:3,17,21	1016:23,24	1033:13,17	September	944:14,25	1039:1,3,5,21
944:19,21	1018:2,12,18	1051:6,15,23	967:15,18,19	945:1,3,22	1040:1,8,14
948:15	1019:2,11	1053:14	sequence	946:1,5,13,21	1040:16,23
949:18	1021:25	1058:3	1042:21,24	947:1 948:1,6	1041:1,2,11
950:14,14	1022:23	1060:23	series 952:7	949:1,3,5,8	1042:1,5,18
952:6,9,12,15	1023:8,19,23	1061:3,6,8,8	959:21	949:12,14,24	1043:1,4,21
952:24 953:6	1025:13,25	1061:11,13	1004:3	950:1,6,8	1043:25
953:7,15,20	1026:11,14	1061:15,18	1015:7	951:1 952:1,4	1044:1,18,20
960:8 963:16	1027:3,6,7,14	1061:19,19	1050:13	953:1 954:1	1044:24
963:18,20,21	1027:24	1061:21,24	serve 982:23	954:10,18	1045:1,2,6,9
963:21,25	1028:6,8,10	sees 964:16	serving 906:5	955:1 956:2,6	1045:11
964:4,6,10,12	1028:19	965:2	setting 1021:8	956:10 958:3	1046:1,7,16
964:13 965:3	1029:4,8,10	self-inflicted	settle 986:22	958:6,8 959:1	1046:19,21
968:13,16	1029:17	930:16,17	settlement	960:1,16	1046:23
970:4,17,20	1033:3,9,23	send 911:24	979:10,20	964:14	1047:2,6
970:23,25	1033:25	1016:5	984:15	971:13 972:2	1048:3,6,7,14
971:2,8,9	1035:24	1023:10,21	985:11,16	972:3 973:1,3	1049:1
972:16	1036:3,9,9,10	1024:9	987:11,16,20	973:5 974:1	1060:3,12
973:18	1036:11	sending 912:2	987:25	975:1,3,6,13	1063:2,11,12
974:10	1042:16	915:25 916:5	988:10 990:5	976:2,5,9,13	1063:14
980:17	1044:24	933:17	990:6,25	976:16,22	1064:1
984:11,12,14	1045:2,11	1025:16	seven 913:21	977:21	1065:1,11
985:14 993:7	1048:23	sense 993:6	913:24	978:23	1066:5,11,19
996:8,14	1049:6	sensible 977:10	1015:11	980:10,24	1066:20
999:12	1056:10	994:5 1041:2	1016:3	981:15	1067:2,8,11
1000:10	1057:23	sensitive	shake 919:12	987:22,24	1067:20,23
1001:5,15,18	1064:24	966:24	999:17	988:3,11	1067:25
1001:22	1065:3,4	967:10	share 1028:9	990:17 991:4	1068:3
1002:3,5,7,10	seeing 993:13	sensitivity	sheet 1063:19	991:6,10,13	shirt 940:7
1002:17	1030:24	981:22	SHER 1048:9	991:17,20	shit 922:6
1003:2,5,7	1036:11	sent 911:8	Sherborne	992:10,14,18	1014:6
1004:18,18	seeking 906:2	922:17,19	0:17 900:2,3	993:2,6,11,16	shock 917:19
1004:18,19	1044:3	952:22,24	900:6,11,12	993:18,20,22	917:23
1004:20	1068:8	993:9 1015:4	901:1,12,16	993:23 994:5	945:16,17
1005:6,9,24	seeks 988:18	1016:4	901:18 902:1	994:7,10,11	short 936:4
1006:3,24,25	seen 914:6,8,15	1023:8,12,15	902:7,22,23	995:3,6,7,8	956:9 972:8
1007:5,6,6,10	918:11 924:4	1024:4,5	903:1,4,6,12	996:1 997:1,4	976:3 982:13
1007:14,16	926:6 930:14	1025:14	903:23 904:1	997:8	988:12 992:4
1007:18,19	930:23	sentence	904:7 905:1,4	1009:19	992:19
1008:2,6,9,16	937:11	932:25 939:8	905:8 906:1,6	1018:8	993:21 994:8
1011:19	943:11,20	983:19	906:8,16,18	1019:7	1043:11

1046:25	1008:8	1048:5	1052:14,16	1026:21	1055:18,21
1066:2	1009:21	1068:9	1052:19	1032:20	1055:23
shout 1061:3	1015:8	sitting 913:11	1064:2	1034:16,19	speak 964:15
shouted 1061:5	1032:15	967:20	smash 1061:13	1037:3,13	965:18
shouting	sides 910:8	995:14	smashed 908:3	1042:19	976:25
925:10	990:8	1021:11	919:22	1047:9	984:15
1061:6,6,8	sign 1003:24	1058:25	939:24	1048:21	999:14,22
show 952:4	1059:8	situation	Smithsons	1051:4	1028:23
964:15	signature	929:24 946:8	937:23	1052:19	1041:5
970:13	901:7 960:8	947:7 950:23	soiling 1052:23	1055:8	speaking 929:9
981:16	960:11 996:9	1039:9	solution	1057:11	995:16
1003:16	996:10,11	situations	1027:22	sort 911:22,22	specific 999:8
1016:6	1049:6,8	947:15	somebody	917:4 918:9	speculate
1017:17,18	signs 970:9	six 983:11	930:14	921:10,12,13	1009:20
1017:20	1015:20	size 985:15	967:11	928:2 942:21	1010:3,11
1018:12,14	Simons 0:19	987:16,20,25	980:20 986:2	943:4 969:5	speculation
1019:21	simplest	988:10	1014:8,25	972:3 988:17	1010:5,20
1020:2,8,13	1039:18	1053:17,18	1021:24	1005:7	speech 928:16
1021:24	simply 928:6	1063:9	1052:7	1011:23	936:18 937:3
1033:5	930:20	skin 969:15	1055:6	1017:2	speed 1006:16
1034:7	931:19 935:3	1030:17,19	somewhat	1019:3	spend 961:25
1035:22,23	989:22	1037:25	1002:9,10,10	1020:3,4	1056:21
1045:3	1039:12	slam 972:16	soon 1023:21	1021:5	1062:6,9
1063:14	1059:25	slammed 964:9	1059:24	1034:12	spending
showed 1030:5	1060:17	slapped 937:7	sorry 900:19	sorted 938:10	1056:17
showing 953:4	1062:3	937:8 951:13	900:19 907:5	942:24	spent 1033:2
989:11	1067:24	951:19,19	909:11	sorts 982:16	1055:17,20
1001:7	Singapore	slapping	926:13,17	1019:13	spill-over
1032:7	938:8,15,22	951:21	927:2 929:8	1030:14	992:7
shown 944:12	939:20	sleep 938:24	937:2,17	sought 902:9	spine 1000:6
945:4 963:19	940:14	939:21	943:11	948:14 988:8	spoke 1055:18
972:8 974:2	sir 900:8 915:7	1056:22	947:12,22	988:13	1055:21
981:15,18	916:25	sleeping	949:24	1041:18	spoken 999:17
1003:19	919:11,15	1057:23	952:16	sound 959:2	spot 947:20,25
1015:15	920:19,21	slept 1051:11	957:15	sounds	spouse 985:20
1027:16	925:25 930:4	slicing 920:12	969:11 984:5	1024:14,15	springboard
1029:15	930:6 933:4	slight 1002:3	986:24 998:8	source 952:18	988:16
1032:9	934:9 935:21	slightly 936:14	1001:19	962:20	staff 1067:12
1033:14,17	935:25,25	954:14	1004:18	974:20	stage 902:21
1033:21	939:11	990:19	1007:2,2,15	sources 962:15	907:17 915:2
1038:5,6	946:12,18	1006:23	1008:18	962:16,16,18	959:5
shows 964:22	948:5 952:16	slow 916:8	1010:25	south-east	1038:16,17
965:13,17	954:22,25	1017:19	1011:23	901:24	1043:21
1000:25	1049:7,9,12	slowly 946:5	1013:16,17	902:11 905:7	1044:11
side 910:19	1049:15	small 927:16	1014:6	908:5 938:16	1052:5
950:15,16,17	1057:15	944:10 960:4	1016:15	943:10,15,22	1060:20
952:5,6	1063:4,23,25	1052:12	1017:11	south-eastern	1066:15
954:16 960:4	1064:3,6,9,13	1053:5	1018:5,20	943:8,9 944:2	stairs 924:7
965:13,17	sit 900:7	1063:22	1023:16	space 910:14	stand 903:13
985:13	1042:20	smaller	1026:14,20	Spanish	940:12

989:22	1017:17	story 921:3,4	913:5	1062:4,8	905:5 906:7
standard 916:5	1026:5	straight 914:21	subsequently	supposedly	1059:10
standing	1032:14	917:12,13	979:5	981:17	
916:20	1034:9,10,11	923:8	substantial	sure 925:19,20	T
start 904:21	1034:11,18	straightaway	916:20	956:7 971:7	tab 900:16
906:5 929:7	1034:20	977:20	suffered	985:5 991:10	910:17,18
931:21	1036:24	Strand 0:3	908:25	991:11	926:16,18
959:16 972:9	1038:3,24	stress 982:16	943:21 944:6	1004:6	927:5 937:19
976:11	1039:10,17	strict 1050:18	1035:9	1008:23	949:21 950:2
978:13 984:6	1040:7,9,16	strikes 980:21	suggest 917:24	1010:25	952:5 966:11
995:24	1040:24	980:25	937:6 970:2	1014:18	970:15 973:2
1000:5,10,13	1042:16,22	striking 953:25	989:5,13	1021:5	973:3 983:8
1007:13	1042:22,24	954:3	1006:2	1025:8,12	1000:8
1012:3	1043:2	stripe 1021:25	1014:6,25	1055:10	1004:15,18
1032:3	1044:15	strong 1016:13	1015:2	1057:20	1006:17
1048:13	1048:23	1016:23	1016:6	1066:12	1007:8
started 934:12	1049:11	1017:3	1025:17	1067:6,14	1011:14,16
starting 912:13	1051:9	struck 953:13	1030:23	1068:5,9	1013:11
942:3 981:4	1058:14,17	stuff 923:20,22	1055:15	surprise 925:2	1014:12
1021:23	1059:13	944:17	1057:6	surprised	1016:10
starts 976:4	1063:14,16	stylist 998:3,15	1058:11	905:19	1021:20
1008:4	statements	998:21,23,25	suggested	1056:10	1022:14,20
1040:24	902:12	sub-files	908:2,22	survivable	1026:8,9,15
state 917:4,23	903:13,15,21	959:21	968:20	1017:7	1032:20
stated 967:21	904:4,5,6,24	subdivisions	969:20	sustained	1035:16
statement	904:25 906:5	950:3	974:16 981:7	1032:8	1044:22
900:17,22	977:16	subject 902:19	981:19,20	swear 957:11	1045:7
901:9,21	1029:22	990:23	1035:5	957:13,16,17	1048:19
902:18	1041:19	991:21	1039:2	994:18	tabs 933:7
903:11,19	1057:16	992:16	1065:5	sweeping	959:21 996:4
904:2 910:12	1064:8	1040:9	suggesting	1060:7	take 903:15
912:25 913:3	states 1036:4	submission	930:15 937:8	Sweetzer	906:12
913:5 915:11	1056:22	903:14 904:9	972:21 975:7	1050:9	908:16
915:15	station 939:20	904:17	1011:8	1051:6	910:11
919:17 925:4	stay 908:18	905:16	1055:11,20	1056:11,18	917:10
959:16,23,25	1040:20	982:21	1056:20	1056:22	918:10
959:25 960:7	staying 916:11	985:23	1057:2	1057:9,12,14	921:17 927:5
960:9,14	938:23	988:16,17,19	suggestion	1057:24	935:6,9 936:2
963:7,11	1014:11	989:22	920:23	Sweezer	944:10
965:15,18,20	1058:2	992:24	930:25 966:7	1057:25	947:18
968:25	Stenograph	1010:13	969:16 979:7	swiftly 965:6	950:21 952:5
972:21,22	0:13	1041:24	suggests 906:4	switching	953:14
973:20 974:5	Stephens 977:4	1042:11	1060:13	905:4	957:21 960:7
981:4 982:18	992:6,11	1044:2	suit 966:6	sworn 900:5	964:17
983:5,5,15	Steve 1023:12	submissions	supplementary	958:2 1000:2	976:20
988:21 990:3	1023:12,15	978:13,14	904:6	1047:7	977:12
991:7 995:25	stick 972:8	988:14 993:4	support 931:19	1048:2	983:20
996:6,8 997:2	1048:16	993:7	934:16	sympathetic	990:21
999:4,5,22	stood 947:2	1060:19	1008:12	906:13	1000:6
1000:2	stop 1024:17	submitted	1020:3	sympathy	1002:6

1004:11	959:4,25	terminate	907:25	1017:2,16	1018:16,22
1009:7	team 907:3,5	1065:17	909:15	1039:18	1019:19,24
1014:19	916:9 929:15	terms 929:4	919:12,16	1042:13	1020:3,25
1026:8	935:23	979:12 986:3	920:22	1055:4,7,9	1024:22
1028:10,25	942:20	1028:16	927:24 931:5	1059:7	1025:15
1032:14	947:18	1039:24	935:12,15	things 917:17	1030:11
1048:18	technical	1052:23	936:3,6 941:4	929:4 945:18	1031:6
1060:10	921:11	terrible 917:23	941:5,6	949:9 968:6	1032:7,17,20
1066:10	technically	938:24 940:4	950:20	975:11	1033:23
1067:5	979:21	940:6	953:23	989:24	1034:9
taken 913:11	technology	terrorem 906:3	954:18,21,22	1021:10,10	1036:10,13
918:3,5	969:9	text 911:8,10	954:25 957:6	1042:10	1036:17
935:18	Telephone	911:19,24	957:7,9 958:4	1051:18	1038:6,22
940:25	0:15	912:21	958:15,24	1060:13	1041:2
950:20,21,24	television	921:24 922:4	959:5 960:17	1068:9	1043:22,24
951:9 972:11	1003:16	922:17,19,21	965:20	think 901:21	1044:24
972:13	1016:25	923:8,9,12,17	966:15 971:9	907:24 910:3	1047:4
990:19 997:9	1019:21	923:18	971:11	910:7,12	1051:22,25
1000:19	1020:14	933:17,18	975:13,16,17	911:17 913:2	1052:16
1029:11	tell 902:8	944:11,11,19	975:20 983:3	915:4 916:2	1053:25
1032:12	917:10	945:4 952:7	988:2 991:4	917:24 923:9	1054:3,13
1034:25	935:13	952:19,22	992:17	925:12	1056:10
1035:9	943:25 944:4	953:6,18	993:20 994:7	927:18 929:3	1058:2
1038:6	945:19	983:23 984:2	994:15,16	930:19 931:3	1059:13
takes 994:22	957:11,13	984:6 989:12	995:5 996:24	934:6 935:9	1066:22
1067:20	994:18	1006:23	997:4 999:19	937:15	1067:8
talk 935:19	1028:7	1011:8	1003:10	939:17 940:8	1068:5
958:20	1035:8	1012:17	1010:14	941:2 944:17	thinking
1058:25	1038:20	1013:24,25	1018:10	945:5 948:20	996:18
1067:13	telling 975:8	1016:4,11	1026:18	949:25	thinks 965:6
talked 951:10	1019:20	1019:10	1029:7	951:11 956:5	third 952:24
989:8	1031:5	1022:4	1031:4	958:25	953:6,12
talking 905:6,8	1040:14	1023:3,12,15	1033:21	959:15,17	992:22
911:4 914:14	tells 1041:6	1024:7,10,12	1040:22	965:7 970:5	thought 946:15
918:7 922:8	temper	1024:13,20	1046:7,9,11	972:15	948:21 963:3
930:12	1059:16	1025:5,13,13	1046:13,14	974:14 975:3	976:25 977:8
951:10 952:2	tempestuous	1033:21,23	1047:9,12	975:3 976:5	984:8 993:9
969:5 970:5	934:13	1033:25	1048:5	976:13 977:2	1008:13
970:14	tempted	1034:25	1049:6,13	977:5,24	1019:22
995:19	943:12	1035:18	1050:20	978:3,4	three 924:6
1018:13,21	tempting 959:9	texted 1023:23	1055:25	990:13	938:24
1024:15	ten 902:4 916:3	texting 953:12	1062:11	991:20,22	939:21
1041:3	935:10,14	1035:8	1065:11,13	996:14,16	940:21,23
1055:21	953:13	texts 915:25	1065:15,16	1002:19	952:17
talks 990:3	ten-minute	916:5 983:22	1065:18	1003:4,14,15	954:12
995:21	936:2	1009:25	theory 985:15	1004:21,21	961:17 984:6
tape 945:4,5,5	tentatively	1024:24	thing 912:19	1008:15	996:14
981:19	954:15	1035:10	927:2 932:25	1009:17	1005:14
Tara 956:2,10	term 921:11	thank 900:8	945:22 948:8	1013:7	1014:16,24
957:2 958:2	947:6	901:4,18	957:10 967:9	1016:4,22	1023:7

1024:5	1053:23	1008:11	933:10	957:11,14	1016:6
1048:25	1055:17,20	1019:16	950:22 951:3	975:8 994:18	1017:18,22
threw 968:24	1056:17,21	top 922:14,21	transcripts	1031:5	1017:23
throat 908:23	1056:24	927:12	926:9	try 966:6 986:8	1018:3,6,7,12
ticked 977:19	1058:2	933:15,24	translator	995:19	1019:17,23
tight 982:20	1059:21	934:4 937:25	1046:22	1020:20	1020:2
till 1068:13	1060:10,16	938:8,22	trapped 920:23	trying 911:24	1024:5
Tillet 1012:13	1062:6	951:5 952:9	921:13	918:25 925:9	1025:20,21
1013:9	1066:3	952:10 960:4	trashed 908:3	931:16	1034:7
1015:3	1067:15,20	960:4 967:16	trauma 917:19	988:14	1038:23
timber 916:21	timed 1005:23	978:3 984:6	929:2	989:10,24	1041:25
916:21	times 940:9	984:10	treat 909:4	1009:23,24	1044:7
time 901:20	953:14 982:2	989:21	treated	Tuesday 0:5	1052:12
902:12,13,25	1009:22	1005:7	1005:20	turn 900:14,16	1053:20
904:2 905:12	1032:18	1006:24	trespassing	900:24	1063:6,9,22
905:12	1063:24	1007:10	1067:12	906:13	type 953:17
906:11	1068:6	1011:19	trial 904:14	910:19	1055:4
908:21 910:4	timetable	1012:3	957:7 981:10	927:12,20,21	typeface
910:6 913:4,8	982:20	1013:25	982:10,11	929:9 936:14	937:23
913:20,23	timing 992:21	1063:19	994:16	949:21 952:5	
914:19 917:2	today 906:15	torn 912:19	1046:12	968:4 975:19	U
927:5 928:20	913:7 938:25	Tornado	1065:16	976:18	Uh-huh
931:12 936:6	told 902:6	947:18	trials 904:14	991:15 996:4	1013:19
937:13,14	907:19	total 961:17,18	trick 979:8,9	996:8 1005:2	ultimate
946:22	919:23	totally 962:5	tried 946:2,8	1015:5	1066:24
953:24 957:8	920:11	trailer 906:22	946:18 947:2	1024:20	unable 1036:7
958:12,16	930:13,14	914:2,12,13	1008:5	1045:12,13	unaware
963:10	942:7,9	914:16,18,24	trip 902:2	1048:19,25	902:16
965:25	959:18	915:2,5	906:21	turned 1037:9	unclear 969:7
969:22	977:17	train 901:24	907:13,14,14	1037:20	1004:25
975:17	981:25	902:11 905:7	907:15,15	1064:16	1011:23
976:10	990:15	908:6,16,21	908:25	turns 981:5	1023:17
977:12	1004:7	908:21 914:6	915:13	1037:17	underneath
981:15	1023:16	914:11,12	938:15,15,19	two 901:14	937:7 951:12
984:10	1028:8	940:15 943:8	938:19	905:20	951:14,16
988:16,16	1033:24	943:9,10,15	943:22	913:13 939:4	1000:25
989:9,9	1059:9	943:23 944:2	true 901:10	939:7 940:3	1005:14
991:18	1063:5	train's 939:15	912:4 920:3	943:11 948:3	understand
993:21	1064:19	939:20	934:19,20,20	950:21,22,24	903:18,20,23
994:16	tolerance	trained 947:17	948:23 949:4	965:21 976:3	904:13 906:8
995:15	1043:19	947:19,20,20	954:16,16	976:14	907:17
1004:4	tolerate 953:25	947:21,25	960:14 997:2	977:16	911:19
1006:14	954:2,4	tranches	1010:9,16,18	979:13	912:10 913:9
1009:8,9	tomorrow	979:13	1011:9	984:25	913:23
1011:23,24	1008:13,16	transcript 0:13	1013:9	988:21 989:7	916:16
1021:12	1019:18,19	0:22 927:17	1022:11	989:11	919:15
1029:14	1022:8	928:16	1049:11	993:19 999:8	920:19,20
1050:20	1023:7	929:14,16,16	1064:8,9	999:21,25	929:19
1051:9	1068:12,13	929:17 930:9	truth 934:18	1001:9,10	935:20,21,25
1052:7	tonight	932:11	948:25	1007:19	942:17 948:6

958:22 959:7	909:2	1054:1	968:20	1001:5	931:1,5 932:1
962:3 976:16	Untidy 918:14	1055:1,10,20	972:17 973:6	1010:21	932:16 933:1
976:23 977:9	untrue 954:17	1056:1	973:8,14	1019:3,5,6,7	933:6,10
977:23 978:6	972:21	1057:1,21	visible 970:4	1038:7	934:1,11,21
978:17	1062:5	1058:1,6,16	970:11	1040:12	935:1,6,9,12
982:11	unusually	1058:22	1000:3	1042:8	935:15 936:1
987:14	963:8,14	1059:1,19	1029:19,25	1044:13	936:6 937:1
988:11 990:6	973:6 976:2	1060:1,22	1033:10	1059:23	937:18,21
990:11	update	1061:1,17	1038:3	1060:6	938:1,3,6,8
996:13	1023:22	1062:1,3,12	visibly 1034:21	1061:16	938:11,13,15
999:14,19	upset 945:12	1063:1,3,16	visualise	1066:8	939:1,12,15
1004:4	945:15	1064:1	1036:7	1067:22	939:18 940:1
1027:20	1059:3,3,4,6	1065:1,6,9,11	vodka 919:22	wanted 912:19	941:1,5
1028:10	1059:7	1065:14	voice 900:10	913:12 965:3	942:13,13,19
1030:6	upstairs	variety 920:5	927:24 945:9	967:9 979:25	944:12
1035:2	1051:10	various 948:23	946:6	989:6 1019:4	948:11 949:9
1039:6,21	urgently	984:16	volume 910:11	1019:8	954:14
1043:16	915:21	992:12	917:11	1058:25	958:18 959:6
1044:4	use 959:24	vehicle 964:15	926:21,24	wanting 989:8	960:16 961:2
1047:6	1023:13	vehicles 988:14	927:20,21	wants 982:14	962:1 963:1
1054:5	1056:23	989:20	958:24 959:2	987:25 994:3	964:1,19,20
1055:10	useful 909:12	venomous	983:24,25	1041:23	965:1,3,8
1056:19	910:16	922:11	1019:11	1043:14	966:1,13,18
1065:10	977:23	ventilate		1046:16	967:1,19
1066:21	978:11	1067:15	W	1047:4	968:1 969:1
1067:25	990:18	ventilated	wait 927:7	1052:2	970:1,15
1068:3,8	999:18	1039:22	954:18	washed 918:16	971:1 972:21
understanda...	uses 964:10	1067:14	960:16 997:4	Wass 0:19	974:18 975:7
1011:3	usher 957:22	victim 948:15	1045:6	902:5,6,25	977:19,25
understanda...	958:25,25	948:16	1049:13	905:19,23	978:4,5,19,22
1052:10	994:22	video 956:3	waiting 915:9	906:4,11	978:25 979:3
understanding	usual 948:15	957:3 963:17	1034:16	910:2,3,17	979:18 980:3
923:21	948:16 956:4	963:19 972:8	walk 924:6	911:1,6 912:1	980:7,12
understood	1021:15,16	972:17	walking 938:25	913:1 914:1	982:22 983:4
983:12	1037:25	975:19 976:3	1034:13	914:12 915:1	983:8,10,18
984:16	utmost 911:15	995:4,12,14	Walsh 0:14	915:9,11	983:25 984:4
unfair 931:7	utterly 1010:6	1040:20	want 910:8	916:1,9 917:1	984:6,14,18
unfortunately		1048:4	915:20	917:2 918:1	984:21,25
993:7	V	view 910:7	917:25	918:25 919:1	985:7,10,19
unharmred	Vargas	932:20 933:3	929:21 931:6	919:17 920:1	985:23 986:5
931:12	1046:20	964:25	932:17	920:10,23	986:10,13,15
uninjured	1047:3,4,13	981:21	934:12,18	921:1 922:1	986:18 987:5
925:5	1048:1,2,5,9	1053:15	946:21 947:6	923:1 924:1,3	987:8,14,17
1034:22	1048:14,16	1054:15	962:17	924:17 925:1	987:20 988:2
uninterrupted	1048:23	vindictive	967:11 970:8	925:12,23	988:8,13,18
939:13,15	1049:1,8,10	922:7	973:13	926:1,3,13,16	988:20
United 1056:21	1050:1,3,17	violence	987:18 988:9	926:18,22	989:10,14,16
unmarked	1051:1	905:15 979:4	990:16 993:3	927:1,9,18,19	992:3,15,17
969:23	1052:1	violent 963:9	994:4 995:22	927:24 928:1	997:5,10
unnoticed	1053:1	963:15	996:13	929:1 930:1,7	998:2,3 999:1

999:21	1044:7,12,15	973:22	944:17	954:11,22,25	1042:22,24
1000:1	1049:14	1018:15	wide 1045:12	955:2 956:2,3	1043:2
1001:1,11,15	1050:2,3	WC2A 0:4,14	wider 1041:20	956:10 957:5	1044:15,23
1001:23,24	1051:1,25	wearing	WILSON 0:17	957:9,13,17	1045:4,14
1001:25	1052:1,4,19	925:12 974:7	win 1045:24	957:20 958:7	1046:9,14,15
1002:1,23	1053:1	1003:23	1046:4	959:16,23,25	1046:17
1003:1,14	1054:1	1030:20,22	window 924:17	959:25	1047:2
1004:1,13	1055:1,10,20	1033:7	wine 1061:19	960:14	1048:9,23
1005:1,6	1056:1	1037:21	wish 1033:17	963:18	1049:11
1006:1,9,15	1057:1,12,16	1057:18,20	1066:16,19	964:15,16,20	1052:4
1007:1,8	1058:1,16	1058:13,18	wished 903:9	972:20,22,24	1057:16
1008:1	1059:1,20,21	1064:25	wishes 992:3	973:20 974:4	1060:25
1009:1,20,23	1059:22,25	Wednesday	1042:18	975:20,21	1062:2
1010:1,15	1060:1,6,17	1012:18	withdrew	977:16 978:6	1063:14,17
1011:1,4,6,13	1060:22	wee 927:2	955:2 975:21	981:4,25	1065:13,18
1011:14,16	1061:1,24	weeks 1056:12	1046:15	982:18 983:5	1065:19
1012:1	1062:1,11	1058:3	1065:19	988:21 990:3	1066:4
1013:1	1063:8	weight 1040:3	witness 900:3,8	991:7 993:25	witness's
1014:1,18,21	1064:7	welcome	900:13,17,22	994:11,14,20	1025:9
1015:1	1066:2,11,14	971:12	901:9,20	995:25 996:6	witnessed
1016:1,11,18	1066:21	well-known	902:18	997:2,7 999:4	920:4
1016:21,25	1067:2,6,13	1058:8	903:11,12,15	999:5,15,19	1010:10
1017:1,7,24	1068:5	well-trodden	903:19,21	1000:2	witnesses
1018:1,11,24	Wass's 905:12	1010:19	904:2,4,6,10	1001:12	903:21 904:5
1019:1,10	906:7 927:7	welts 1022:7,10	904:12,13,23	1003:14	904:18
1020:1,14	990:9	1025:22	904:24	1006:12	905:10 976:3
1021:1,13,19	way 904:3,23	went 906:22	905:15,18	1007:6	986:11
1021:23	905:3,11	912:10	906:5 907:7	1009:19	988:13
1022:1,20	907:10 927:4	923:10	907:19	1010:16,17	989:20
1023:1	932:18 933:2	942:20,24	910:12,14	1010:17,20	995:11
1024:1,22,24	947:24	948:7 989:20	913:11 914:6	1010:25	1010:7
1025:1,3,6,8	964:23	1023:20	914:8,11	1011:10,18	1040:17
1025:10,15	965:10	West 1037:2,17	915:7,11,14	1016:15,20	1041:17
1026:1,13,22	969:17	1050:9	916:12,25	1017:5,22	1042:6,22
1027:1,3	976:23,24	1056:2,10	919:3,11,15	1018:4,14,22	1066:22
1028:1,4,5,10	977:13,22,22	1057:25	919:17 920:2	1019:9	1068:5
1029:1,3,8	978:5,15	whatsoever	920:13,19	1020:16	witnesses'
1030:1,10,12	980:18	902:10,15	921:3 924:4	1025:13	902:12
1030:20	993:14	white 903:16	924:19	1027:20,25	WOLANSKI
1031:1	995:12,13	967:21	925:14,25	1029:22	0:19
1032:5,7	1000:21	976:19	926:5,17,20	1032:14,22	woman 953:25
1033:21	1014:22,23	977:21,25	927:11,25	1035:20	954:3
1039:15,24	1032:13	980:9 984:14	930:4 931:6,8	1036:22,24	wonder 963:17
1040:5,6,14	1033:18	984:17 985:2	932:15 933:4	1037:15	992:18
1040:25	1039:14,22	985:7,10,19	933:9 935:17	1038:24	1039:14
1041:10,13	1041:11,18	985:21 987:2	935:21,25	1039:10	WOOTTON
1041:22	1053:11	988:4 990:24	941:6 942:16	1040:3,6,16	0:11
1042:8,14	1054:15	991:8	948:5 949:17	1040:22,24	word 947:24
1043:9,15,16	1060:7,9	whitey 923:19	950:4,10	1041:19	969:9 1005:8
1043:18,25	ways 905:8	923:21	952:3 953:23	1042:15,22	1007:10

1012:9	989:12	OT 1048:13	148E 1026:8,15	984:4,6	1038:6
1015:11	1007:17		14th 0:5 965:21	196B 937:18,19	22nd 967:14,18
1052:17	wrong 900:19	<u>1</u>	15 968:24	938:2	967:19
worded 922:23	929:3 996:21	1 0:11 914:22	156 927:2	19A 1021:20	996:16,18
words 902:16	wrote 943:17	915:6,6	156A 926:16	1HP 0:14	1050:24
915:23,24	992:6	952:11,17,18	926:18,19,20		23rd 996:21,22
916:22	www.marten...	1012:5,6,7	926:23 927:5	<u>2</u>	24 936:18,25
919:21 922:6	0:15	1013:18	927:6	2 0:11 900:15	937:2
922:13		1022:2	157 926:20	952:11,16	24th 999:23
945:20,24,24	<u>X</u>	1.05 1007:13	933:6,8	959:19 976:4	1026:2,6
946:3,7,13,16		10 1068:12,13	936:12	983:8 996:2	1029:12
946:19,22,25	<u>Y</u>	100,000 924:24	159 1026:12	1032:20	1030:2,15,16
947:5	year 901:22	106 1014:24	15th 979:11	1048:18	1030:21
1019:18	961:18,24	107 1001:10	1003:13	20 916:3	1036:23,25
1051:13	980:3 985:3,3	109 1001:24	1004:7	2002 998:16	1037:9
work 904:14	985:3	10A 1004:18	1005:11	2013 901:19	1038:8
954:11 998:6	years 913:21	10B 1004:15	1032:8	906:22	1055:25
998:9,10	913:24	11 961:23,24	16 983:15,17	913:17	1057:9,13
1062:6,9	915:12	962:23	983:18	980:15	1058:20
worked 909:4	919:18 929:3	1005:23	1013:11	2014 965:21	1064:12
909:5 962:22	934:15 948:2	119 910:18,19	16th 999:8,22	2015 901:25	25th 913:3
998:21	948:3 953:17	983:25	1000:5,19	908:14	27th 938:8,14
1009:8	961:23,24	11th 960:5	1003:11,13	913:17	938:16
1025:24	962:23	12.16.2015	1003:14,15	915:13	1029:23
1041:3	979:13	1007:13	1004:8	938:18,18	1038:7
1062:7	998:16,17	12.17.2015	1007:22	968:5 980:5	2900 0:15
working 910:6	1050:4	1015:3	1011:21	999:9,22	29th 970:6
956:8 1006:7	1055:3	12/15/2015	1012:2	1000:5,19	2LL 0:4
1006:12	1060:25	1005:8	1017:2,15,15	1005:12	2nd 0:14
1055:3	1062:7	12/16/2015	1019:12	1007:22	
1060:25	yell 1059:14	1012:18	1025:24	1012:2	<u>3</u>
worried 975:10	1060:23	1207.5 938:3,5	1026:5	1032:4	3 933:11,12
1040:25	yellow 1008:4	938:6	1032:25	2016 903:7	952:14,16
worry 952:14	1021:25	1207.9 939:4	1033:6	910:4 911:9	1054:9,10
953:4 988:25	1023:5	12th 983:6	1035:21	979:11 980:5	1056:15
worse 981:2,4	Yep 1023:20	137 966:11	17 1011:14,16	996:18	3.30 939:12,19
worst 1051:22	yesterday	139 1035:17,19	17th 1016:4	999:23	940:25
worth 983:20	908:8 937:7	1035:20,20	1021:23	1026:2	30 916:2
wound 940:10	951:13	139A 1035:20	1023:3	1050:8,24	930:23
969:13	976:20	13A 1006:17	1036:3	1056:17,20	1050:4
wrapped 940:7	1014:7	1006:17,18	18 933:14	1057:3,6	1062:7
wrecked 924:3	1060:4	1006:19	974:4 998:16	2018 979:13	38 983:8
924:4		14 905:14,14	998:17	2019 983:6	
Wright	<u>Z</u>	983:10	1014:12	2020 0:5 913:3	<u>4</u>
1012:13	zombies 938:25	148 950:2	19 1022:13,14	915:12 960:5	4 966:11
1013:9		970:15,16	1022:19,20	963:7	1035:15,16
1015:3	<u>0</u>	1026:14	190 910:20,21	20B 1016:9,10	4.30 1060:5
writing 915:9	0 1014:16	148B 949:21	910:22,25	21 929:12	40 916:12
960:4	020 0:15	950:6	911:7	21st 1029:12	41 996:4
written 981:17	0S 1048:8	148C 1000:8	194 983:23	1030:4	1032:21

5	1026:11				
5 926:15,16,18	1036:24				
926:24	1037:22				
936:10	81 1007:8				
1032:25	81.1 1007:7				
1034:2	813 967:19				
5.1 937:16,17	87N 1045:7				
51 1048:19,19	894.103				
52 1005:24	1000:13				
53 900:17,20	894.107 1001:6				
59 952:5	8th 926:10				
59B 959:22	9				
973:3	9 936:20				
5B 921:19	996:14				
6	1044:21				
6 0:22 910:11	9.26 1005:9				
910:17	911 936:15				
921:18	978.80 929:10				
926:13	978.81 929:8				
949:21	987.11 936:16				
970:15					
983:24,25					
1000:6					
1004:12					
1026:8					
6-9 0:14					
60 980:9					
7					
7 921:17,19					
926:12					
930:11					
963:11					
972:22 973:5					
979:11					
984:16					
1004:11,13					
1011:15,16					
1013:11					
1021:19					
1063:15,18					
70 1040:23					
1041:3					
1044:2					
7067 0:15					
8					
8 952:4,5					
1017:24					