

Exhibit C

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VIRGINIA:

IN THE CIRCUIT COURT FOR FAIRFAX COUNTY

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JOHN C. DEPP, II, :

Plaintiff, :

v. : Case No.:

AMBER LAURA HEARD, : CL2019-0002911

Defendant. :

-----x

HEARING

BEFORE THE HONORABLE BRUCE D. WHITE

Conducted Virtually

Friday, October 23, 2020

10:30 a.m.

Job No.: 326192

Pages: 1 - 33

Reported by: Judith E. Bellinger, RPR, CRR

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Conducted on October 23, 2020

1 HEARING BEFORE THE HONORABLE BRUCE D. WHITE,
2 conducted virtually.

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9 Pursuant to docketing, before Judith E.
10 Bellinger, Registered Professional Reporter,
11 Certified Realtime Reporter, and Notary Public in
12 and for the State of Maryland.

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A P P E A R A N C E S

ON BEHALF OF THE PLAINTIFF:

BENJAMIN G. CHEW, ESQUIRE

CAMILLE VASQUEZ, ESQUIRE

BROWN RUDNICK, LLP

601 Thirteenth Street, NW

Suite 600

Washington, D.C. 20005

202.536.1700

ON BEHALF OF THE DEFENDANT:

J. BENJAMIN ROTTENBORN, ESQUIRE

WOODS ROGERS, PLC

10 South Jefferson Street

Suite 1400

Roanoke, VA 24011-1319

540.983.7600

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A P P E A R A N C E S C O N T I N U E D

ELAINE CHARLSON BREDEHOFT, ESQUIRE
CHARLSON BREDEHOFT COHEN & BROWN, P.C.
11260 Roger Bacon Drive
Suite 201
Reston, VA 20190
703.318.6800

ALSO PRESENT:

Adam Waldman

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1 P R O C E E D I N G S

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3 THE COURT: Would everybody please note
4 their appearances for the court reporter.

5 MR. CHEW: Good morning, Your Honor.
6 May it please the Court. Ben Chew, attorney for
7 Plaintiff Johnny Depp.

8 With me today is Camille Vasquez.

9 MS. VASQUEZ: Good morning, Your Honor.

10 MR. ROTTENBORN: Good morning, Your
11 Honor. Ben Rottenborn here with my colleague
12 Elaine Bredehoft on behalf of the Defendant Amber
13 Heard.

14 THE COURT: Good morning. Welcome,
15 everybody.

16 MS. BREDEHOFT: Good morning, Your
17 Honor.

18 THE COURT: I'm ready when you are.

19 MR. ROTTENBORN: Thank you, Your Honor.
20 And I'll go as quickly as I can and reserve a
21 couple minutes for rebuttal, if possible.

22 Both this court and the Virginia

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1 Supreme Court have made very clear that they
2 expect lawyers who practice in the Commonwealth,
3 and in this court generally, to adhere to the
4 highest standards of professionalism. That's long
5 been a hallmark of legal practice in Virginia.

6 In this case, the Court granted
7 Mr. Waldman's pro hac vice application on the
8 trust that he would comport himself like the Court
9 expects all Virginia lawyers to do.

10 Mr. Waldman's abused that trust, quite
11 simply, Your Honor, and we're here today asking
12 that the Court put a stop to this conduct.

13 Now, Mr. Depp's brief is more notable,
14 I think, for what it doesn't say than what it
15 does. It doesn't deny that Mr. Waldman engaged in
16 any of the conduct that's detailed in our brief.
17 They don't even try to deny it. And I think the
18 guiding case here, Your Honor, with respect to pro
19 hac vice is the Williams & Connolly case from the
20 Virginia Supreme Court that says that revocation
21 of pro hac vice status is appropriate when
22 counsel's conduct reflect, and I quote, "an

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1 inadequate understanding of Virginia's ethical
2 requirement and/or fails to meet 'the level of
3 professionalism that our chief justices as well as
4 many others in the state have worked so hard to
5 instill.'"

6 And I'll briefly detail the conduct
7 here as detailed in our brief as well, Your Honor,
8 but it falls into a couple categories. The first
9 is that Mr. Waldman has blatantly produced at
10 least two documents that have been marked
11 confidential under the protective order in this
12 case.

13 The first is a deposition transcript of
14 a third-party witness named Josh Drew.
15 Mr. Waldman leaked a portion related to sexual
16 rumors, false sexual rumors, about Ms. Heard.
17 When we learned of this from a third-party media
18 outlet reaching out to us in June, we immediately
19 reached out to Mr. Chew that the press had
20 contacted us; that this portion of the deposition
21 was marked confidential; and asked that whatever
22 leak had happened be retracted.

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1 He didn't respond. Though in a later
2 conversation he didn't deny that Mr. Waldman had
3 leaked it, and had no defense for that conduct.

4 Now, it's no -- well, the second
5 category, Your Honor, is, I think, even more
6 egregious, is that he literally took text messages
7 that had been produced by Ms. Heard in this case
8 and marked confidential, took screenshots of them,
9 or somehow uploaded them electronically, except
10 removed the confidential footer, and sent them out
11 to the world directly on his Twitter account, with
12 no regard for the confidentiality order, no regard
13 for the process for de-designating items that one
14 doesn't believe are confidential.

15 And that's no answer for Mr. Depp to
16 argue, as he does in his brief, that this material
17 should not somehow have been marked confidential.
18 There's a mechanism for de-designating documents,
19 it's Section 2 of the protective order, and it
20 requires the party to meet-and-confer, and, if
21 necessary, ask the Court to remove or modify a
22 confidentiality designation.

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1 And one thing we'll agree on is -- that
2 I can agree on with Mr. Chew, is that process.
3 Because in Mr. Drew's deposition, Ms. Heard's
4 former counsel challenged Mr. Chew's designation
5 of a different part of that transcript as
6 confidential, and Mr. Chew responded quite
7 correctly, "We want the right to designate and you
8 have the right to challenge."

9 And that's correct. That's the way it
10 should work.

11 What the protective order does not do,
12 Your Honor, is give Mr. Waldman the unilateral and
13 unfettered right to decide what he thinks should
14 be confidential and then to send everything else
15 out to the world. To send a tweet out to the
16 world with a screenshot of that.

17 If you look at their brief, it's very
18 telling. They don't ever deny it. They don't
19 even reference that he did it because it's
20 accepted that this is exactly what he's done. And
21 he makes a few other arguments.

22 Again, any argument that the material

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1 wasn't properly designated, that's an argument
2 that the parties can work through under the
3 protective order. But I will note that, as I
4 understand it, up until last week, nearly the
5 entirety of Mr. Depp's document production in this
6 case had been marked confidential. They purported
7 to de-designate much of that last week without
8 specifying Bates numbers or anything, clearly in
9 response to this motion. But that's not at issue
10 today.

11 They also claim in the brief that
12 Ms. Heard produced some of her own documents in
13 the UK proceeding to The Sun, and so she shouldn't
14 be complaining that Mr. Waldman did the same.
15 Well, that's an absurd argument, Your Honor. A
16 party can always decide which documents she or he
17 believes of their own should be confidential. But
18 that's a far cry from allowing an attorney for the
19 other side to unilaterally decide that something
20 isn't confidential and screenshot it to the world.

21 Then that's the argument that
22 Ms. Heard's counsel somehow improperly produced

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1 documents in the UK litigation, it's the ultimate
2 red herring, Your Honor. That's not at issue
3 today and we would defend everything that was done
4 in connection with the UK proceeding.

5 But the only thing I'll say about that,
6 and as the Court received judicial notice of on
7 July 9th, is that the UK court found that Mr. Depp
8 had failed to produce documents from this
9 litigation that it had ordered produced, and found
10 that conduct sanctionable. And then granted the
11 relief from sanctions was that it threatened to
12 dismiss this case if Mr. Depp somehow made the
13 arguments in the U.S. that he is making today;
14 that somehow Ms. Heard did something wrong. But
15 in any event, not at issue today. Not before the
16 Court. What's before the Court is Mr. Waldman's
17 conduct.

18 The second category of misconduct is
19 repeatedly leaking documents in this case in order
20 to trigger press articles that he then tweets
21 about. So there are audio recordings,
22 surveillance tapes, medical records, declarations.

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1 I'll run through what he does in a couple of these
2 instances. He gives all of these documents to
3 news outlets who then write incorrect and
4 misleading stories. For example, he will draft
5 declarations with the case caption here, Your
6 Honor has seen these in prior motions, he'll leak
7 them to the press and then tweet an article that
8 usually misleadingly says that these are court
9 documents, or documents that have been filed in
10 this case, when in almost all instances they had
11 never been produced to us before they were leaked
12 to the press. And in many instances were
13 individuals who were not even identified on a
14 witness list.

15 I think the most egregious example of
16 misconduct in this category, Your Honor, are
17 medical records relating to the finger injury that
18 Mr. Depp sustained in Australia. And, of course,
19 the cause of that is a subject in dispute in this
20 litigation.

21 The Court ordered these medical records
22 to be produced on October 18th, 2019, so we passed

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1 the one-year anniversary last week. Mr. Depp
2 didn't produce them. But in April 2020,
3 Mr. Waldman provided these documents to an
4 anonymous Twitter user, who then wrote an article
5 and claimed that they were new evidence, three
6 exclamation points. Mr. Depp still didn't produce
7 them. We had to move to compel on July 10th just
8 to get them to produce what they should have
9 produced nine months prior, but that Mr. Waldman
10 had already seen fit to leak to an anonymous
11 Twitter user.

12 Our brief at page 3 and 4 recites a
13 litany of further abuses by Mr. Waldman and leaks
14 that have been made, Your Honor. And, you know,
15 we're not just complaining about these in a
16 bubble. These have a direct impact on Ms. Heard's
17 ability to take discovery. And I'll give you two
18 examples.

19 The first is that Mr. Drew, once his
20 deposition testimony was leaked, he initially
21 threatened to -- not to come testify on The Sun's
22 behalf in the UK trial, which is understandable.

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1 Because he had taken a deposition and he believed
2 it was confidential, and then Mr. Waldman had
3 leaked it without any process or meet-and-confer.
4 So he ultimately did testify, but there was, as I
5 understand it -- I wasn't there -- but as I
6 understand it, it was his lawyers' initially said
7 that they weren't going to produce him, or he
8 wasn't going to testify.

9 The second one, this is detailed in our
10 brief as well, Your Honor, is when a third party,
11 there's a third party in California whose
12 deposition was sought, and his attorney was
13 emailing with counsel for both parties about
14 potential confidentiality protections in this
15 case, and requesting that. Mr. Waldman leaked
16 that attorney's email, which, as I understand it,
17 made that witness -- you know, I don't know
18 whether he will ultimately testify or not. But
19 that kind of derailed the efforts to get him to
20 testify initially.

21 The Court in this case has repeatedly
22 told the parties not to engage in this conduct.

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1 And you've heard me say a half dozen times
2 probably, Your Honor, that these accusations that
3 they make against our side for somehow violating
4 your Court's admonition about the reasons for the
5 continuance, that just did not happen. So they
6 can say it all they want, but it did not happen.

7 This is a one-sided type thing in this
8 case, and the Court's repeatedly told the parties
9 not to engage in this conduct. It's impeding
10 Ms. Heard's rights to take full and fair
11 discovery, as I've detailed. It's also
12 threatening the right to a fair trial. It's
13 tainting the jury pool. And it's just unbecoming
14 of any lawyer that practices before this Court.

15 Your Honor, we've tried everything that
16 we could. We've sent them a letter. We've
17 brought it up in discovery motions.

18 Now, they tried to compare this lawyer
19 through some of their cases to -- or this conduct
20 through the cases that they cite, to things like a
21 lawyer giving an occasional press conference. But
22 this is a far cry from that.

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1 Let's be clear about what's going on,
2 Your Honor. This is an attorney who's leaking
3 protected documents, leaking documents that
4 haven't been produced, in some cases which have
5 been ordered to be produced, creating declarations
6 and giving them to press, claiming that they're
7 documents filed in this case; all to manipulate
8 the press and the consuming public, and then
9 tweeting about the very false, misleading, or
10 improper articles that he helped create.

11 There's no legitimate cause for this
12 conduct, Your Honor. And the argument in
13 Mr. Depp's brief that all he's doing is sending
14 tweets out to articles that have been published is
15 fairly circular when his misconduct is what's
16 causing those articles to be published.

17 So in short, Judge White, there's no
18 regard for the Court's admonitions by Mr. Waldman.
19 Its orders, including discovery orders, the
20 protective order, and no regard for the rules.

21 And I'll just note, and we're not here
22 today to seek relief on this, but we noticed

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1 Mr. Waldman's deposition for just last Wednesday,
2 October 14th, and he didn't show up or move for a
3 protective order. Now, we understand that Your
4 Honor limited the document discovery from him.
5 But when he's out there talking to potential
6 witnesses, talking to the press, talking to
7 anonymous Twitter users, that work is not attorney
8 work product. It's not attorney-client privilege.
9 It goes directly to Ms. Heard's defenses in this
10 case, and to her counterclaims, and it's
11 discoverable, and we intended to ask him about it.
12 But he didn't show up. Didn't move for a
13 protective order. And once again, an attorney on
14 our team was present with the court reporter and
15 the videographer ready to depose him, but like
16 Mr. Depp, he flouted the rules and he disregarded
17 the deposition notice.

18 So we ask this Court to hold
19 Mr. Waldman to the standard that Virginia courts
20 expect attorneys to adhere to. Revocation of pro
21 hac vice is absolutely appropriate. Supreme Court
22 has said it's a privilege, it's not a right. Your

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1 Honor has referred to that multiple times. And
2 prohibition on speaking to the press here is
3 absolutely appropriate too.

4 This is, like I say, a far cry from
5 just a one-off press conference or an op-ed, a
6 newspaper, you know, press release that courts
7 have found is insufficient for a gag order. This
8 is repeated hundreds and hundreds of tweets,
9 repeated leaks, and improper conduct with respect
10 to the media, all of which impede the right to a
11 fair trial and the right to full and fair
12 discovery.

13 And I'll save the last couple minutes
14 for rebuttal, Your Honor, subject to any questions
15 you have. But we would also -- we would ask for
16 that relief as well as for fees in having to bring
17 this motion.

18 THE COURT: Thank you.

19 MR. CHEW: Good morning, again, Your
20 Honor.

21 May it please the Court. Ben Chew, for
22 Plaintiff Johnny Depp.

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1 The Court should deny Defendant's
2 motions for sanctions in its entirety. And I will
3 address each of the allegations Mr. Rottenborn has
4 made.

5 But I would like to start with the law.
6 Ms. Heard has not cited a single case, not one,
7 that supports the imposition of the one-sided gag
8 order she proposes here today. By contrast,
9 Mr. Depp has cited several cases, including two
10 from the 4th Circuit, that's In re: Murphy-Brown
11 case, LLC, 907 F.3d 788 and Hirschkop v. Snead,
12 594 F 2d 356, both of which hold that gag orders
13 are rare because they implicate two disfavored
14 forms of expressive restrictions. One of those is
15 prior restraints and the other is content-based
16 restrictions.

17 We also cite the U.S. Supreme Court
18 case of Gentile, which reversed the lower court's
19 finding that an attorney violated the state rule
20 on pretrial publicity expressing doubt that an
21 attorney's press conference six months before
22 trial could possibly prejudice the other side.

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1 That's 501 U.S. at 1039.

2 Applying this authority, Your Honor,
3 the Court should deny Ms. Heard's motion for gag
4 order. Indeed, the hypocrisy of her petition is
5 stunning. This is the same Amber Heard who
6 abruptly left closing arguments in The Sun trial
7 in London to conduct a press conference on the
8 courthouse steps with Ms. Bredehoft at her side,
9 which Your Honor can see on YouTube. Moreover,
10 two of Ms. Heard's prior three successive lead
11 counsel, Eric George and Robbie Kaplan attacked
12 Mr. Depp in the media and repeated Ms. Heard's
13 false claims of domestic abuse, and did so
14 repeatedly.

15 Mr. George, for example, stated, "The
16 evidence in this case is clear. Johnny Depp
17 repeatedly beat Amber Heard." By contrast,
18 Ms. Heard cites a private Twitter account, not a
19 press conference.

20 There's nothing here that would justify
21 the extreme remedy of a gag order, especially one
22 which would only ban speech on one side.

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1 Similarly, the law is clear that
2 "Revocation of an attorney's pro hac vice
3 admission is a harsh sanction. As a result, it
4 should be exercised sparingly and only in the most
5 egregious cases."

6 That's the A1 Procurement case from the
7 Eastern District of Virginia, 2015 Westlaw
8 13733927 at page 3. And I apologize, Your Honor,
9 the cite in our brief said page 19, but it's
10 actually asterisk page 3.

11 And the cases Ms. Heard cites into
12 which Mr. Rottenborn refers are completely
13 inapposite. Only one of the case, Williams &
14 Connolly v. PETA, even involves revocation. And
15 as Your Honor is well aware, that case involved
16 extraordinarily, wildly inappropriate false
17 allegations in pleadings, repeated pleadings, by
18 the lawyer at issue impugning the character of
19 Judge Stitt, before whom I had the honor of
20 practicing, as did Ms. Bredehoft. This case could
21 hardly be more different.

22 There's no allegation that there was

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1 any improper filing. Nor -- and there certainly
2 was no impugning of any judicial officer. And
3 it's amazing that as egregious as that conduct was
4 by the pro hac vice counsel, there were three
5 justices who actually dissented. Two said there
6 shouldn't have been a pro hac vice revocation.
7 And one said it should have been remanded, which
8 is stunning, in light of the conduct.

9 Meyer involved frivolous and
10 perturbative pleadings, not disqualification.
11 Nussbaum involved a case where one lawyer struck
12 another lawyer, perhaps in the presence of the
13 jury. That didn't involve disqualification. And
14 American Science, that they cite, also didn't
15 involve disqualification, but monetary sanctions
16 and other remedial measures.

17 Like Williams & Connolly, that was
18 outrageous. That's where attorneys issued a press
19 release that falsely and deliberately
20 misrepresented a court's ruling. Said that a
21 motion to lift by default judgment was actually an
22 adverse ruling on summary judgment. They did it

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1 with respect to a publicly traded company to
2 damage the stock prices. And then they refused to
3 retract it.

4 So there's no press release here. And
5 there's certainly no misstatement of any court
6 ruling anywhere. And there's certainly no
7 improper pleading.

8 Based on this authority and the
9 exercise sparingly standard, the Court should deny
10 Defendant's motion to revoke the pro hac vice
11 because Ms. Heard does not even allege, much less
12 show, any improper court filings.

13 What we have here, Your Honor, are
14 out-of-court statements on personal Twitter, not
15 press releases, made more than -- made almost one
16 year before trial, referencing materials for which
17 Ms. Heard waived confidentiality, and I'll get to
18 that in a moment, but never should have been
19 designated in the first place and were already in
20 the public domain.

21 Getting back to Mr. Rottenborn's point.
22 In The Sun case Ms. Heard voluntarily waived

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1 confidentiality designated -- she voluntarily
2 waived her designations of everything she marked
3 confidential here. But what he omits to tell you
4 is that not only did she turn over all of her
5 documents, she also gave The Sun's lawyers every
6 single document Mr. Depp produced here in
7 Virginia, even those documents marked confidential
8 and fell under the three categories. There are
9 only three categories, as Your Honor knows,
10 because we had a big argument about this, that
11 should be marked confidential here: medical
12 records, the diary, and personal identifiers. And
13 The Sun used all of those -- Mr. Depp's
14 confidential documents against him at the London
15 trial last summer.

16 And it bears noting here that Ms. Heard
17 was not a party in The Sun case. She was not
18 under subpoena. She and Ms. Bredehoft just turned
19 it all over to The Sun to hurt Mr. Depp without
20 any regard to the protective order.

21 By contrast, and this gets directly to
22 what Mr. Rottenborn said, the Josh Drew deposition

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1 transcript referenced by Mr. Depp's counsel
2 contained no information that qualifies as
3 confidential. There were no medical records;
4 there was no diary; and no personal identifiers.
5 And they never should have been marked
6 confidential by Ms. Heard's second lead counsel,
7 Robbie Kaplan. And Robbie Kaplan was the one who
8 was implicated on the spin of the judge's order,
9 the first order continuing the case.

10 Indeed, Ms. Heard's prior lead counsel
11 designated each and every single one of her emails
12 and texts confidential, even though none of it
13 contained confidential information. There were no
14 personal identifiers; there were no medical
15 records; there was no diary.

16 As to the text messages referenced in
17 the personal Twitter account, these were already
18 in the public domain and had been published by the
19 Daily Mirror. The references by counsel were
20 after they were published in the Daily Mirror.

21 I'll go very briefly to the other
22 things that Mr. Rottenborn mentioned. The

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1 declarations he referenced have all been produced.
2 The letters relating to Ms. Heard cutting off
3 Mr. Depp's finger have been produced. Mr. Drew,
4 as Mr. Rottenborn said, in fact, testified in the
5 public trial in London.

6 In short, Your Honor, we do respect
7 this Court's order, and at no time did pro hac
8 vice counsel ever leak or refer to anything that
9 the Court -- that medical records, personal
10 identifiers, any of that, and the Court should
11 deny the motion in its entirety. There's no --
12 does not meet the legal standard for a gag order
13 or for revocation, which is a very high standard.

14 Thank you, Your Honor.

15 THE COURT: Mr. Rottenborn?

16 MR. ROTTENBORN: Thank you, Your Honor.
17 Just briefly.

18 With respect to the UK proceeding, I
19 disagree with everything Mr. Chew said. But
20 that's not at issue today. That's not before the
21 Court. What is before the Court is Mr. Waldman's
22 conduct and Mr. Chew addressed the cases that they

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1 cited in their brief, which deal with a one-off
2 press conference six months before trial and
3 things of that nature. He says -- and then he
4 tries to distinguish our case just by saying that
5 the conduct in those cases that we cited was
6 outrageous.

7 Well, I would argue, Your Honor, that
8 taking a picture of a document that's been marked
9 confidential, that has not been produced, not
10 publicly available anywhere, and tweeting it out
11 to the world is far more outrageous than any of
12 the conduct in the cases that we've cited.

13 And as to the law that Mr. Chew cited,
14 there's no issue in those cases of a party
15 violating a protective order by leaking documents
16 like that as part of a press campaign to
17 manipulate the press to thwart efforts of
18 third-party discovery, and to do all of this
19 without providing that same discovery, that should
20 have been produced months before pursuant to court
21 order, as there is in this case.

22 So this case is a far cry from those

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1 cases that Mr. Chew has cited in which a gag order
2 was not imposed, and we believe that that's -- and
3 the tweets, they're continuing. Since we filed
4 our motion, we believe that that's the only way to
5 prevent the harms that we've detailed in our
6 brief. And, sure, trial is not until May now.
7 But when this conduct was engaged in, the trial
8 had not yet been moved, so we have every reason to
9 believe that it will continue.

10 Finally, Your Honor, with respect to
11 the pro hac vice, Mr. Waldman's never shown up in
12 this court. He's admitted pro hac vice not to try
13 this case in the courtroom, but to represent
14 himself as Mr. Depp's lead attorney in trying the
15 case in the press.

16 And for all the reasons detailed in our
17 brief, and the reasons that we've mentioned today,
18 we believe that's highly inappropriate and we ask
19 for whatever relief the Court deems appropriate.

20 Thank you.

21 THE COURT: Mr. Rottenborn, let me ask
22 you this question: If I was to revoke

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1 Mr. Waldman's pro hac vice status, what authority
2 would I have to issue a gag order against him?

3 MR. ROTTENBORN: Well, it's -- the
4 authority is that he would still be acting as
5 Mr. Depp's agent. You know, they've tried to use
6 that as both a sword and a shield here in
7 resisting discovery and saying he's just acting as
8 Mr. Depp's agent. Now today, they say, well, it's
9 a private Twitter account.

10 But I think as long as he's holding
11 himself out, as he repeatedly does, as Mr. Depp's
12 attorney, it doesn't matter whether he's admitted
13 in this court or not. The Court can prevent
14 Mr. Depp from making statements, whether by
15 himself or through his agents, that would cause
16 the type of harm that we've detailed here.

17 So I think the Court retains -- I was
18 thinking about that before the hearing today, Your
19 Honor, and I don't think the revocation of pro hac
20 vice status impacts the Court's ability to
21 prohibit Mr. Depp from making the type of
22 statements, whether by himself or through his

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1 agents, that we've detailed.

2 THE COURT: All right. What I find is
3 that Mr. Waldman has violated the Court's order as
4 far as confidentiality. I find that as a result
5 of that he has failed to meet the level of
6 professionalism expected of Virginia attorneys,
7 and his pro hac vice status is revoked.

8 I'm not convinced, Mr. Rottenborn, that
9 I have the authority on mere allocation, with some
10 statements that you make, that I have the
11 authority, or that it would be appropriate to
12 issue a gag order against one side and only one
13 particular individual, so I decline to do that.

14 I have an order in front of me, and it
15 seems that an order can be either resubmitted,
16 taking out the part about the gag order, or I can
17 line through that and initial it.

18 Do you all have thoughts on that?

19 MR. ROTTENBORN: We would be fine if
20 you just line through that and initial it, Your
21 Honor.

22 MR. CHEW: Your Honor, we would like to

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1 see the order, if it's possible, and note any
2 exceptions we have.

3 We have been cooperative, as
4 Mr. Rottenborn will note, with all but -- in all
5 but one case in agreeing on the language of the
6 order. So I think we should follow that protocol
7 here once we have an opportunity to review the
8 transcript. And I don't see any reason why we
9 could not get an order to Your Honor by Monday.

10 THE COURT: All right. I think that's
11 appropriate, Mr. Chew. I grant that request.

12 So if you all can get that to me, I'll
13 take care of that next week, all right?

14 Anything further for today then?

15 MR. ROTTENBORN: I guess just the
16 request for fees in our order, Your Honor.

17 THE COURT: Well, that remains in the
18 order. You'll submit those. Mr. Chew will file
19 an appropriate response and we'll see what happens
20 after that, okay?

21 MR. ROTTENBORN: Thank you, Your Honor.

22 MR. CHEW: Thank you, Your Honor.

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1 THE COURT: Thank you all. Hope
2 everybody stays safe.

3 MR. ROTTENBORN: Thank you, you too.

4 (Off the record at 10:57 a.m.)
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CERTIFICATE OF SHORTHAND REPORTER

I, JUDITH E. BELLINGER, RPR, CRR, the court reporter before whom the foregoing hearing was taken, do hereby certify that the foregoing transcript is a true and correct record of the testimony given; that said testimony was taken by me and thereafter reduced to typewriting under my direction; and that I am neither counsel for, related to, nor employed by any of the parties to this case and have no interest, financial or otherwise, in its outcome.

IN WITNESS WHEREOF, I have hereunto set my hand and affixed my notarial seal this 23rd day of October, 2020.

My Commission Expires: November 3, 2020

Judith E. Bellinger

NOTARY PUBLIC IN AND FOR
THE STATE OF MARYLAND

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