

# EXHIBIT 12

**AMBER HEARD:** So anyway, do you want to sit down?

**LAURA D.:** Yeah. Alright. So I'm going to fill you in with what they're doing to me right now, Johnny's doing.

**AMBER HEARD:** Okay. What's going—so you sent me that screen graph, but it looked like from that screen—

**LAURA D.:** Apparently the attorney that Johnny's working with was like threatening if I didn't get back to him that I'd have to literally—so I'm like—

**AMBER HEARD:** What did he say?

**LAURA D.:** That—'cause I said—he first approached me, I said no. I go, I really don't know anything about this. That's not something Amber and I ever talked about as far as abuse goes. I wasn't there until that summer when I was helping her put things together. And I know for a fact I was in Africa during that time. Well he has me on file, on photograph, going into the building every single day apparently.

**AMBER HEARD:** Oh, so it wasn't when you were in Africa.

**LAURA D.:** No. Yeah. He was like, then he thought I was totally conspiring with you and I literally took it that I was like this lying person and he was going to go ahead and subpoena me.

**AMBER HEARD:** So how did that information get to you?

**LAURA D.:** He directly contacted me. He called me on the phone and then I just didn't pick up. And then the next night he literally texted me. And so that's when I said, I go, I just kind of plead like I don't know anything. I go, that wasn't a part of their life that I was exposed to or anything along those lines. I said, I knew that it was a difficult relationship at best. I go, but I was peripheral. And so anyway, he was just like—and I said, I know that summer was the summer that I was planning this big trip to go to Africa, so I go, I wasn't even there that summer. In my mind I wasn't. It's been four years, so I didn't know anything. And then I got a text from him at like 3:00 in the morning basically calling me a liar and literally saying, well then you are just part of Amber's conspiratorial group. I mean this guy is the biggest asshole under the sun. I don't know how you're dealing with this because I have been shaking like for days on this. So he basically was like, he just kept being really—I said, I'm sorry, I don't know Amber to be that person at all. And I believe her. And then he's like, well you have to sit there and I need to have a conversation with you on the phone. And if not, we will subpoena you and you will be deposed. I'm like, are you kidding me.

**AMBER HEARD:** So he said you will be deposed if you don't have a conversation—

**LAURA D.:** Correct. Without question. So I'm going to paraphrase what they said after the conversation. It was almost two and a half hours. He was the biggest ass I've ever encountered into my life. But what they have got, according to him, they needed me to sign a declaration that

said that he accused me of like, okay, well had you been with Elon, James Franco. I'm sure you've got—I said, I know nothing about that. I said, and honestly to my knowledge, the first I heard about Elon was in August. And I said Amber was just really, really sweet going, you know what I just want—I had no—I go, I know nothing about that. Well there's a photograph of you taking some flowers up to the penthouse suite. I kid you not. I don't know what you're doing with it, how you're dealing with this. And I said, that wouldn't have been unusual. I would have gone through. And they said, are you going to be going up there, and he's like, well did you know that they were from Elon. I said, I would have no idea who they were from. I go, I'm not going to read somebody's envelope. And so he tried to get that information from me and I really, I was being honest. I didn't know anything. And then this is just so—Amber, you have no idea. I absolutely adore you. You know that. And it's like, I sat there and like these guys, he's the biggest asshole under the sun. So he again was like, you know, bottom line, they have Kate under deposition. He's like, do you know she's going through PTSD. Which I don't know if he was lying. And I was like, she's like you've heard Amber yell at her. I said, listen, the only time I have ever—'cause he's like, I know for a fact. I said, the only time I've ever heard Amber yell at Kate in my entire life was one time during the move. And I said, honestly she fucked it up. And I said, there's just no way. I go, other than that, I know nothing about that. And she's like, well we have it on record that she's called you crying. And that, remember I told you, you've got to get rid of Kate because she's calling me drunk. And I said, yeah. I go, but Kate is the wrong person. Kate consistently screwed things up all the time. She was a mess. And I didn't say that she was drunk when he was calling me because I didn't want to give him more information on this. And then he was talking about like when the place went on the market and I guess they interviewed Kevin too and they've got Kevin. Don't do this because I am—okay. So there was something about pink slips and he was describing it as a pink slip from hell horror house. I mean he's got a way with flourishing words. Like I said, the biggest asshole. And I said those were things that were earmarked. I said, there were clearly things that were not Johnny's that were not pink marked. I'm under the impression that obviously there was an agreement that everything from that apartment was agreed upon that Amber would get. So there's no issue with that. And he was trying to get me to say this, and I didn't know anything about this either. But your mother coming in at some point in front of Kevin Dees. I'm just saying this so you know. And screaming about like she's going to take him for everything he's worth or something like that.

**AMBER HEARD:** Wait, my mom?

**LAURA D.:** Your mother.

**AMBER HEARD:** My mom's never screamed.

**LAURA D.:** No, I know that. That's what I'm saying. I go, I've only met Amber's mother a few times. I go, that seems so not to her character. I go, if you're asking me if I witnessed it, I swear to God I did not. But these are like the stupid things that are coming consistently. And then it was like, well have you talked to Rocky? They're apparently planning to subpoena Rocky, which I'm sure you're aware of, for perjury.

**AMBER HEARD:** You can't subpoena someone for perjury.

**LAURA D.:** I know.

**AMBER HEARD:** You subpoena someone as a part of a legal process.

**LAURA D.:** Well there you go.

**AMBER HEARD:** It's actually manipulating and coercing people through threats.

**LAURA D.:** He's completely manipulating it.

**AMBER HEARD:** Without people being savvy about the law, they are threatening people to coerce statements out of people.

**LAURA D.:** I know. Yes.

**AMBER HEARD:** And people are actually able to be tricked, if you don't know anything about—

**LAURA D.:** Right. I get that. I get that. And he's going on about, well do you know about [INDISCERNIBLE 00:07:25]. And I said, I didn't know any of that. So then he's like, well then now you know about it. I'm like, well okay, great.

**AMBER HEARD:** He just told you.

**LAURA D.:** He just told me. I know. But that's what I'm saying.

**AMBER HEARD:** Nothing he says—it's all manipulation.

**LAURA D.:** I know it is. So basically—

**AMBER HEARD:** I mean this guy has literally said they have me on camera, which funny we've never seen that footage. We've seen me stand in an elevator, but they literally made up this thing about Whitney practicing hitting me in the hallway and they have it on camera. Oh, yeah. Like that's where the bruises came from. I'm like, oh yeah, well where is that footage? Like he literally it's just made up. It's literally just made up.

**LAURA D.:** It's horrible. It's horrible. I mean I have not slept for nights because I just didn't even know how to tell you that this has now been brought up and I have to go ahead and tell you about all this information. So he basically said, if I didn't sign a declaration—but it doesn't state anything from you at all. It's just like was I aware of [INDISCERNIBLE 00:08:28]. And I said, well no, I am not. But I told you about it the other day, so that's in there. If I didn't I was going to be deposed and he's like, and it was going to be \$15,000 to \$20,000. So I'm telling you now because I need you to know that and I need your attorneys to then go ahead and get me to do a declaration too and question me so that I can say something in your favor because he's not giving me any—I would like explain things. Like he said, well you were up there. I said, yeah, but that

didn't mean I was up with Amber going over this huge plot. I go, I'm with Amber like 5, 10, 15, minutes, half an hour at most and we're there—I'm there to work. And so I don't know, you know, any of this. And it was like, well you need a yes or a no. Then you're not familiar with how the court system works. I'm like, no. I've never been in a court ever. So I was literally forced into signing a declaration that again does not say—it's the most vanilla thing imaginable but I can't afford \$20,000 because I don't even know what's going on with Elon right now. But I need your attorneys to sit there and work out a declaration so that I'm in your favor so it nulls anything out. Because I didn't see—because he's like, well did you see her completely—did you see her absolutely beaten up. And he was using the analogy of well if my arm was ripped off. And I'm like, I said she was visibly upset the entire time. And I said, it came from an absolutely true place. Well true place, and then he would go ahead and just say some complete other fabrication. Like I felt like my hands are completely tied and there was nothing I could say to resurrect the situation. And I just was like doing your damnest. So he did the stupid declaration thing and I just kept expunging things and expunging things. And then he just wouldn't do anything else. So it's really vanilla and I will show it to you as much as I possibly can, but I want your attorneys to call me and literally let me do a declaration for you because I don't know what else to do. I am like literally heart broken about this because I can't sit there because we never had—you know, I didn't know any of this knowledge beforehand. I mean it was literally afterwards. You always hid it from me.

**AMBER HEARD:** It's not your fault. You didn't know. I hid it from everyone.

**LAURA D.:** I know, Amber.

**AMBER HEARD:** It's what people do. But after, you know, after the divorce, right immediately after that incident, my eye was—did you see my face?

**LAURA D.:** I only saw your face when it was swollen and it was red, but I didn't see any—at that point there was nothing there. And I just said—and I said, I don't recall it. I go, if you're asking—because he's like, I'm not asking you. I'm saying—he was telling me that it wasn't the phone that was thrown at you. That you had said that Johnny had physically beaten you up afterwards. And I said, again, I did not spend any time with you. I have a new—like if I knew what was going on, I would have literally looked at you more intensely and I didn't. You were just—I said, you were just kind of a hot mess at that time and devastated. But I didn't see you at that point where—he was like, she would have been all black and blue. Did you see any black and blue? No, I didn't see black and blue, but she was all swollen and red and she had been crying. So that is what we are at.

**AMBER HEARD:** How many days after the...?

**LAURA D.:** He said it was like—and again, it's four years ago, so I couldn't even place it. I honestly did think at that time I was in Africa and I thought I met you after that. He's got the dates. I don't even know the dates, but he threw in and was like, you were there on like the—and I'm paraphrasing 'cause I don't know. Like the 23rd, 24th, 25th. And then you've got on the 28th. And then there was some event in December he wanted me to give and I said, I don't know anything about that at all. So I go, please—he's like, well we have you up there on the

15th. And I said, but I might not have even seen Amber. I mean very seldom did I—I mean I'd see Amber, but I go, I never saw Johnny. And here's the beauty of it. Well Johnny happens to think you're a really nice person and he doesn't want to depose you, but if it comes to that he will. And I'm like, well then how nice of a guy is he, you know. Anyway, I just—

**AMBER HEARD:** After I filed for divorce, I mean after I filed for the restraining order you were around a lot around that time.

**LAURA D.:** I was around.

**AMBER HEARD:** I was wondering if you—are you saying that you didn't know what was going on?

**LAURA D.:** No. I said I knew what was going on. He was like, he wanted to know did I tell you immediately. And I said, I can't recall that because I can't recall that I saw you directly after that incident happened. He's got me in an elevator and that's it, and I don't know. If this was three years ago, I'd have much more clarity as far as the time of reference. You've been living this whole nightmare for four years straight. I don't have my dates clear at all. And that's—

**AMBER HEARD:** But after that, after I filed for the restraining order, do you—are you saying that you knew why I filed for a restraining order? I thought it was pretty talked about.

**LAURA D.:** He didn't talk about the restraining order. He never mentioned that. All he mentioned was did I ever talk—did you ever talk to me about being abused.

**AMBER HEARD:** After?

**LAURA D.:** Before. And then also after.

**AMBER HEARD:** So he specifically said before and—

**LAURA D.:** He was more interested in before.

**AMBER HEARD:** Well of course.

**LAURA D.:** Right. And then he also asked, did I ever talk about it with IO or Rocky and I said, no. I go other than I would always ask her, well how is she doing. I go, but that was our conversation. You know, I seldom didn't really ever get into conversations with Rocky or IO other than, you know, just superficial like what are you up to and that kind of a thing. So I was being really honest because I didn't know—I don't want to sit there and be perjured and I don't have a good timeframe, so I didn't know when. I said, I know I talked about it with Amber, but if you're telling me when did I talk about it with Amber, I honestly don't recall. If you're asking me did I talk about it on this 23rd or 24th, I go, my guess is probably. But I'm being honest, I don't recall because it's been four years and I can't put a date. He's like, well then we'll go ahead and we'll sit there and depose you. I said, you can sit there and depose me now after all of this. I

go, but I'm not going to be able to tell you anything else in all honesty. I'm like, I go I've never had anything but an amazing relationship with her. So—

**AMBER HEARD:** With me?

**LAURA D.:** With you. And I said, so—I go did I ever get into an argument. And he's like, how is your relationship with Johnny. I said, it was fine. It was absolutely pleasant. I go, but I didn't really have any interaction with Johnny at all. I go, I've known Amber for eight years. So, you know—

**AMBER HEARD:** Do you—have you ever seen me be—when you were talking about Kate earlier, I mean do you think I was verbally abusive to her?

**LAURA D.:** No. I literally said, no.

**AMBER HEARD:** Because I remember you being the strongest advocate for me firing her.

**LAURA D.:** That's what I'm saying. So that's—but this guy doesn't want that information and I told him that too. I said, literally the only time I ever heard her raise her voice was that phone conversation—because Kate had brought it up, so that's why it was brought up. Because he's like, well you were visibly aware. I said, the only time I was, was when there was a move. Kate screwed it up. You've got to—and then he went on and he was like, Kate would call you up. And I said yes. I go, she was not suited to the job and she screwed up a lot. I go, she should never have been working with Amber. And that's something I literally said. He is just wanting—because apparently Kate has some sort of vendetta, not shockingly, to go against you. So once again, I need your attorneys then to go ahead and go, okay, explain the Kate relationship with that. Because I will have your back a thousand times 'til Sunday.

**AMBER HEARD:** I just, I am only interested in the truth. I'm not interested in manipulating anyone or anything.

**LAURA D.:** I know.

**AMBER HEARD:** I just want to be clear that you didn't see me be physically or verbally abusive with Kate.

**LAURA D.:** No. The only time, and again she had brought it—

**AMBER HEARD:** But do you think that I was verbally abusive to her?

**LAURA D.:** No. I said you were yelling on the phone because everybody had heard about it. I told you about that incident.

**AMBER HEARD:** About that, just like an incident.

**LAURA D.:** Yeah. Just that one incident. I said never, ever have I heard anything—and then he said, well would you be shocked to find out that she's got PTSD and she's going to meetings for it. And I'm like—I go, in one hand, I would and in the other hand I wouldn't because she's completely off the rails. But of course he doesn't take any of that because he's doing that. And apparently, Kevin Dees is apparently not a nice guy. He's the realtor that was showing the place. You didn't even really meet him I don't think.

**AMBER HEARD:** I don't know who that—

**LAURA D.:** I think you had an altercation with him with the draperies. Remember?

**AMBER HEARD:** Altercation? I haven't even met him.

**LAURA D.:** I mean like it was an argument because the draperies were taken and he's the one that was trying to get the draperies back for the person that bought it.

**AMBER HEARD:** Oh, but I didn't even talk to him.

**LAURA D.:** Oh, then see, then I have no idea, but he's the other one that's saying all of this other crap. So that's the only stuff that I know that the attorney was telling me.

**AMBER HEARD:** And then after, when you were around after my restraining order—because from what I remember is I remember we spent a lot of time. I mean I was—

**LAURA D.:** We were putting your office back together. The dressing room was fine. And we were hanging stuff and putting things back in the living room to make it more back like a home.

**AMBER HEARD:** I'm just like trying to think—I mean, what—

**LAURA D.:** I don't know when that was though. That's the problem. I have no recollection. I honestly thought it was July at some point, but I don't know. I wish I was actually asked this three years ago.

**AMBER HEARD:** Have you looked through your—

**LAURA D.:** I don't have anything. My phone has been changed twice and I got a new notebook. So I don't know where to trace anything.

**AMBER HEARD:** Oh, and you didn't backup?

**LAURA D.:** No. The only thing I backed up were photographs from work.