Exhibit 6

Case 2:13-cv-06004-JAK-AGR Document 122 Filed 09/15/14 Page 61 of 125 Page ID #:2630

CONFIDENTIAL DEPOSITION OF ROBIN THICKE

1 2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 120 221 223 224 25	UNITED STATES DISTRICT COURT CENTRAL DISTRICT OF CALIFORNIA, WESTERN DISTRICT PHARRELL WILLIAMS, AN	2	1 APPEARANCES (CONTINUED): 2 WARGO & FRENCH, L.L.P. BY: MARK L BLOCK, ESQ. 4 1888 CENTURY PARK EAST SUITE 1520 5 LOS ANGELES, CALIFORNIA 90067 310.853.6355 6 MBLOCK@WARGOFRENCH.COM (NOT PRESENT) 7 8 FOR THE DEFENDANT MARVIN GAYE III: 9 LAW OFFICES OF DAVID RUDICH 10 BY: DAVID RUDICH, ESQ. 9288 SUNSET BOULEVARD 11 SUITE 920 LOS ANGELES, CALIFORNIA 90069 12 310.550.8020 DAVID@DAVIDRUDICH.COM 13 (NOT PRESENT) 14 - AND - 15 LAW OFFICES OF PAUL N. PHILIPS, A.P.L.C. BY: PAUL N. PHILIPS, ESQ. 16 9255 WEST SUNSET BOULEVARD SUITE 920 17 WEST HOLLYWOOD, CALIFORNIA 90069 323.813.1126 PNP@PNPLEGAL.COM 19 19 20 FOR THE DEPONENT: ROBERTS LEIBOWITZ & HAFITZ BY: JAIMISON M. ROBERTS, ESQ. 22 271 MADISON AVENUE 20TH FLOOR 23 NEW YORK, NEW YORK 10016 212.871.9002 24 JROBERTS@ROBERTSPLLC.COM (PAGES 39 - 53 AND 144 - 157)
1 2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 22 22 24 25	APPEARANCES OF COUNSEL: FOR THE PLAINTIFFS: KING, HOLMES, PATERNO & BERLINER, L.L.P. BY: HOWARD E. KING, ESQ. SETH MILLER, ESQ. 1900 AVENUE OF THE STARS 25TH FLOOR LOS ANGELES, CALIFORNIA 90067 310 282,8889 KING@KHPBLAW.COM SMILLER@KHPBLAW.COM FOR THE DEFENDANTS NONA MARVISA GAYE AND FRANKIE CHRISTIAN GAYE: KING & BALLOW BY: RICHARD S. BUSCH, ESQ. 315 UNION STREET SUITE 1100 NASHVILLE, TENNESSEE 37201 615 259,3456 RBUSCH@KINGBALLOW.COM - AND - KING & BALLOW BY: PAUL H. DUVALL, ESQ. 6540 LUSK BOULEVARD SUITE 250 SAN DIEGO, CALIFORNIA 92121 858,597,6000 PDUVALL@KINGBALLOW.COM (NOT PRESENT) - AND -		1 APPEARANCE (CONTINUED): 2 3 ALSO PRESENT: 4 ALASDAIR J. MC MULLAN UNIVERSAL MUSIC GROUP 5 CHRIS KNIGHT 6 JUDITH FINELL 7 JUDITH FINELL MUSIC SERVICES, INC. 8 MATT HALE, LEGAL ASSISTANT LAW OFFICES OF PAUL N. PHILIPS 9 TIMOTHY BARKER, VIDEOGRAPHER 10 KELLI NORDEN AND ASSOCIATES 11 MARLON ESTELLA, I.T. 12 13 14 15 16 17 18 19 20 21 22 23 24 25



Kelli Norden and Associates Court Reporters 310.820.7755 phone 310.820.7935 fax 11835 W. Olympic Boulevard Suite 680E Los Angeles, California 9006th kna&kellinorden.com

Case 2:13-cv-06004-JAK-AGR Document 122 Filed 09/15/14 Page 62 of 125 Page ID #:2631

CONFIDENTIAL DEPOSITION OF ROBIN THICKE

1 1	IDEX	1	LOS ANGELES, CALIFORNIA, WEDNESDAY
2		2	APRIL 23, 2014
3 DEPONENT; 4 ROBIN THICKE	EXAMINED BY: PAGE: MR. BUSCH 10	3	11:21 A.M.
	ERNOON SESSION) 84	4	11217 (191)
6	-	5	THE VIDEOGRAPHER: AND GOOD
7 8		6	MORNING.
	(IDENTIFICATION:	7	WE'RE ON THE VIDEOTAPE RECORD,
10 DEFENDANTS		8	BEGINNING DISK NUMBER ONE OF VOLUME NUMBER AT
	NARY EXPERT REPORT OF NELL (18 PAGES) 59	9	11:21 A.M.
12		10	MY NAME IS TIM BARKER AND I'M THE
32 - INTERRO 13 (14 PAGES	DGATORY RESPONSES 67	11	VIDEOTAPE OPERATOR. THE NAME OF MY EMPLOYER IS
14 33 - SUPPLEI	MENTAL INTERROGATORIES	12	KELLI NORDEN AND ASSOCIATES, LOCATED AT 11835 WEST
	ES (26 PAGES) 70	13	OLYMPIC BOULEVARD, SUITE NUMBER 680 EAST, L.A.,
15 34 - "G.Q. MA	GAZINE" INTERVIEW OF	14	CALIFORNIA 90064.
16 ROBIN TH	ICKE DATED 5-7-13	15	TODAY'S DATE IS APRIL THE 23RD,
(4 PAGES)) 75	16	2014.
35 - "BILLBO/	ARD" INTERVIEW OF ROBIN	17	THE LOCATION OF TODAY'S DEPOSITION
	ATED 7-9-13 (3 PAGES) 101 /. INTERVIEW OF ROBIN	18	IS AT THE LAW OFFICES OF KING AND HOLMES, 1900
	ATED 7-29-13 (2 PAGES) 105	19	AVENUE OF THE STARS, 25TH FLOOR, L.A., CALIFORNIA
20	,	20	90067.
	USIC INTERVIEW OF ICKE (1 PAGE) 111	21	THE CASE CAPTION IS "WILLIAMS V.
22 38 - "VEVO'S	TWITTER TAKEOVER"	22	BRIDGEPORT MUSIC." THE NAME OF THE WITNESS IS
INTERVIE 23 (1 PAGE)	W OF ROBIN THICKE 115	23	ROBIN THICKE.
	'INTERVIEW OF ROBIN	24	WILL COUNSEL PLEASE MAKE VERBAL
THICKE (1		25	INTRODUCTIONS FOR THE RECORD.
25			
	6		8
1 INDEX (CO	NTINUED);	1	MR. BUSCH: RICHARD BUSH ON BEHALF
2	TOD IDENTIFICATION.	2	OF NONA AND FRANKIE GAYE.
3 EXHIBITS F	FOR IDENTIFICATION:	3	MR. PHILIPS: PAUL PHILIPS ON
	N THICKE T.M.Z. TRANSCRIPT	4	BEHALF OF MARVIN GAYE III.
(1 PAG		5	MR. MILLER: SETH MILLER ON BEHALF
6 (,,,,,,	-,	6	OF PLAINTIFFS AND COUNTER-DEFENDANTS.
41 - DEPC	OSITION D.V.D. TRACK LIST	7	MR. KING: HOWARD KING ON BEHALF OF
7 (1 PAG	E) AND D.V.D. 166	8	THE SAME PARTIES.
8		9	THE VIDEOGRAPHER: VERY GOOD. AND WILL THE COURT REPORTER PLEASE
9		10	ADMINISTER THE OATH.
10	FORMATION DECLISOTED.	11 12	ADMINISTER THE OATH.
	FORMATION REQUESTED:	13	ROBIN THICKE,
12 13	(NONE)	14	CALLED AS A DEPONENT AND SWORN IN BY
14		15	THE DEPOSITION OFFICER, WAS EXAMINED
15		16	AND TESTIFIED AS FOLLOWS:
LF	TIONS UNANSWERED BY THE DEPONENT:	17	AND TESTIFIED AS I SELSOWS.
17	(NONE)	18	DEPOSITION OFFICER: WOULD YOU
18		19	RAISE YOUR RIGHT HAND.
. 19		20	THE DEPONENT: YES, MA'AM,
20		21	DEPOSITION OFFICER: DO YOU
21		22	SOLEMNLY AFFIRM THE TESTIMONY YOU ARE ABOUT TO
22		23	GIVE IN THE CAUSE NOW PENDING WILL BE THE TRUTH.
23		24	THE WHOLE TRUTH, AND NOTHING BUT THE TRUTH?
24 25		25	THE DEPONENT: YES.
Z3			THE DEI OREITT. 120.
	7		9
11		1	



Kelli Norden and Associates Court Reposters 210.820,7733 phone 310.820,7933 fax 11833 W. Olympic Boulevard Suite 680E Los Angeles, California 9006+ kna@kellinorden.com

1	ABOUT IT	1	TELL ME YOU NEED A BREAK AND I'LL BE HAPPY TO GIVE
2	A. OKAY, OKAY,	2	YOU A BREAK FOR AS LONG AS YOU NEED,
3	Q AND HE WILL GIVE YOU AN	3	A. OKAY.
4	INSTRUCTION. IF HE ULTIMATELY INSTRUCTS YOU NOT	4	Q. THE ONLY THING LASK IS THAT IF
5	TO ANSWER THE QUESTION, I MIGHT DISAGREE.	5	THERE IS A QUESTION PENDING, ANSWER MY QUESTION
6	A. OKAY,	6	BEFORE YOU TAKE A BREAK.
7	Q. I CAN'T FORCE YOU, BECAUSE THERE'S	1	
8		7	A. GOT IT.
9	NO JUDGE SITTING HERE, TO	8	Q. ALL RIGHT. IS THERE ANY REASON WHY
_	A. RIGHT.	9	YOU CAN'T ANSWER MY QUESTIONS TODAY ACCURATELY AND
10	Q ANSWER A QUESTION YOU DON'T WANT	10	HONESTLY? DO YOU ARE YOU UNDER ANY MEDICATION?
11	TO ANSWER.	11	NOT FEELING WELL?
12	A. RIGHT.	12	ANY REASON WHY YOU CAN'T ANSWER MY
13	Q. BUT I'LL MARK THE RECORD AND I	13	QUESTIONS HONESTLY AND ACCURATELY TODAY?
14	MIGHT FILE A MOTION WITH THE COURT, INSTRUCTING	14	A. NO, SIR.
15	THE COURT TO HAVE YOU ANSWER THE QUESTION.	15	Q. OKAY. LASTLY, MR. THICKE, YOU CAME
16	A. THAT MAKES SENSE. SO I STILL DON'T	16	IN HERE. YOU'VE BEEN IN A GOOD MOOD TODAY,
17	HAVE TO ANSWER ANY	17	SPEAKING FRIENDLY, THAT'S ALL FINE. BUT LDO
18	Q. IF	18	WANT TO I THINK IT'S MY OBLIGATION TO INSTRUCT
19	A QUESTION I DON'T WANT TO IF	19	YOU OF ONE THING SO YOU UNDERSTAND THE NATURE OF
20	Q. IF HE INSTRUCTS	20	THIS.
21	 A AND YOU WOULD HAVE TO GO FILE 	21	EVEN THOUGH WE'RE SITTING IN A
22	WITH A COURT TO GET ME TO ANSWER THAT QUESTION,	22	COURT IN A CONFERENCE ROOM
23	Q. IF HE INSTRUCTS YOU NOT TO ANSWER A	23	A. UH-HUH.
24	QUESTION.	24	Q IN YOUR LAWYER'S OFFICE
25	A. ALL RIGHT, LET'S GET IT GOING.	25	A. UH-HUH.
	14		16
1	Q. OKAY. NOW, THE COURT REPORTER'S	1	Q THE YOUR OBLIGATIONS TODAY TO
2	TRANSCRIPT IS THE OFFICIAL RECORD	2	TELL THE TRUTH ARE THE SAME AS IF WE WERE SITTING
3	A. YES.	3	IN A COURT OF LAW.
4	Q. — OF TODAY'S DEPOSITION, SO IT'S	4	A. OF COURSE.
5	VERY IMPORTANT THAT YOU AND I NOT SPEAK OVER ONE	5	Q. AND YOUR YOU'VE TOOK AN OATH TO
6	ANOTHER.	6	TELL THE TRUTH, SO THIS IS A VERY SERIOUS
7	A. GOTIT. SORRY.	7	MATTER
8	Q. SO I'LL TRY AND DO YOU THE COURTESY	8	A. YES, SIR,
9	OF WAITING UNTIL YOU FINISH YOUR ANSWER BEFORE I	9	Q AND THE SAME PENALTIES FOR FALSE
10	ASK MY NEXT QUESTION.	10	TESTIMONY WOULD APPLY JUST AS FORCEFULLY BASED ON
11	A. OKAY.	11	YOUR TESTIMONY TODAY AS IF YOU WERE SITTING IN A
12	Q. JUST TRY, EVEN IF YOU THINK YOU	12	COURT OF LAW, AND I WANT YOU TO FULLY UNDERSTAND
13	KNOW WHERE MY QUESTION IS GOING	13	THAT.
14	A. GOTIT.	14	A. ABSOLUTELY,
15	Q WAIT UNTIL I FINISH ASKING	15	Q. DO YOU UNDERSTAND THAT?
16	BEFORE YOU ANSWER. OKAY?	16	A. YES, SIR,
17	ALL RIGHT. IF THAT'S MY NEXT	17	Q. OKAY. ALL RIGHT.
18	INSTRUCTION, WHICH IS: THE COURT REPORTER CAN'T	18	ALL RIGHT. MR. THICKE, YOU ARE
19	TAKE DOWN NODS, GESTURES, THUMBS UP, THUMBS DOWN.	19	CREDITED AS ONE OF THE CO-WRITERS ON THE SONG
20	SO PLEASE ANSWER MY QUESTION VERBALLY,	20	"BLURRED LINES"; CORRECT?
21	A. OKAY.	ì	· · · · · · · · · · · · · · · · · · ·
22	Q. IF YOU NEED A BREAK	21	A. YES, SIR.
23	A. IUNDERSTAND.	22	Q. OKAY, AND I'VE DONE MY HOMEWORK.
		23	I'VE READ COMMENTS THAT YOU'VE MADE IN THE PAST
24	Q. OKAY. IF YOU NEED A BREAK DURING	24	ABOUT MARVIN GAYE'S SONG "GOT TO GIVE IT UP"
25	THE COURSE OF THE DEPOSITION, PLEASE FEEL FREE TO	25	A. UH-HUH.
	15		400
	15		17



Kelli Norden and Associates Court Reporters 310.820.7735 phone 310.820.7933 fax 1835 W. Olympic Boulevard Suite 680t Los Angeles, California 9006+ Lna8kellinorden.com

Case 2:13-cv-06004-JAK-AGR Document 122 Filed 09/15/14 Page 64 of 125 Page ID #:2633

CONFIDENTIAL DEPOSITION OF ROBIN THICKE

1	Q BEING ONE OF YOUR FAVORITE	1	MINOR SONG PLAYING AT THE SAME TIME.
2	SONGS.	2	OH, LORD.
3	A. YES.	3	DOES ANYONE HERE PLAY AN
4	Q. OKAY, SO YOU'RE FAMILIAR WITH THE	4	INSTRUMENT? DOES ANYONE KNOW HOW IMPOSSIBLE IT IS
5	SONG "GOT TO GIVE IT UP"?	5	TO PLAY THESE TWO SONGS OVER THE TOP OF EACH
6	A. YES, SIR.	6	OTHER?
7	Q. OKAY. I WANT TO PLAY FOR YOU NOW	7	I'M SORRY.
8	SOME MUSIC, AND IT GOES BACK AND FORTH. IT'S KIND	8	MR. KING: JUST BEAR WITH IT,
9	OF LIKE A MASH-UP	9	THE DEPONENT: I KNOW.
10	A. OKAY.	10	MR, KING: AND HE'LL ASK YOU
11	Q BETWEEN "GOT TO GIVE IT UP" AND	11	QUESTIONS. YOU'LL GET ALL THE OPPORTUNITIES
12	"BLURRED LINES." I'M GOING TO PLAY THE WHOLE	12	THE DEPONENT: IT'S LIKE NAILS ON A
13	THING. THERE'S BEEN EIGHT SEPARATE TRACKS HERE.	13	FUCKING CHALKBOARD.
14	A. OKAY.	14	
15		i	SAME THING. MAJOR OVER MINOR,
II.	Q. AFTER I PLAY THESE, I'LL HAVE SOME	15	GUYS. TWO DIFFERENT TEMPOS.
16	QUESTIONS FOR YOU, SO I WANT YOU TO LISTEN	16	YOU KNOW, YOU COULD DO THE SAME
17	CAREFULLY	17	THING WITH "ROAR" WITH KATIE PERRY'S "ROAR."
18	MR. KING: IS THIS SOMETHING THAT	18	AH.
19	IS AN EXHIBIT TO THE DEPOSITION?	19	OH.
20	MR. BUSCH: IT WILL BE.	20	OH, HOW CAN YOU DO THIS TYPE OF
21	(WHEREUPON, AUDIO CLIP PLAYED.)	21	THING?
22	THE DEPONENT: YOU KNOW, YOU CAN'T	22	THIS IS YOU KNOW THE SCENE IN
23	PUT A MINOR MELODY OVER A MAJOR CHORD.	23	WHAT'S IT STANLEY KUBRICK'S MOVIE, "CLOCKWORK
24	MR. KING: HE'LL ASK YOU QUESTIONS.	24	ORANGE"? WHERE HE HAS TO SIT THERE AND WATCH
25	THE DEPONENT: IT'S IMPOSSIBLE FOR	25	TERRIBLE INTERVIEWS AND LISTEN TO HIS FAVORITE
	18		20
MICHIGAN TO ST. MICHIGAN.			
1	ME TO SIT AND LISTEN TO THAT.	1	MUSIC?
2	BY MR. BUSCH:	2	MM,
3	Q. I NEED YOU TO LISTEN. PLEASE,	3	GOD, I GOT TO STOP SMOKING. I WISH
4	A. IT'S LIKE (INDICATING). DOESN'T	4	I STILL SOUNDED LIKE THAT. WHAT A FUCKING VOICE.
5	FIT MUSICALLY AT ALL.	5	MM.
6	OH, IT'S SO HARD TO LISTEN TO IT.	6	CAN'T DO IT. CAN'T PLAY THE TWO OF
7	MAJOR/MINOR CLASHING. NOT SAME KEY.	7	THEM OVER THE TOP OF EACH OTHER. IT'S MUSICALLY
8	OH, THAT'S HARD.	8	IMPOSSIBLE. OH, GOD, THAT SOUNDS HORRIBLE.
9	I WOULD THINK MY BAND WAS TONE	9	IS THIS AN ANESTHESIA BEFORE THE
10	DEAF.	10	INTERVIEW STARTS?
11	OH, YOU KNOW, YOU CAN'T DO THAT IN	11	MR. KING: YEAH,
12	MUSIC. IT'S IMPOSSIBLE.	12	THE DEPONENT: DO WE REALLY HAVE TO
13	Q. I'M GOING TO ASK YOU TO	13	SIT AND LISTEN TO THIS?
14	A OVER THE TOP OF EACH OTHER.	14	MR. KING: IT'S ALMOST OVER.
15	IT'S IMPOSSIBLE MUSICALLY. I DON'T KNOW WHO	15	THE DEPONENT: OKAY, I FEEL LIKE
16	WHAT MUSICIAN CAN EVEN LISTEN TO THIS WHILE A	16	I'M IN THE DENTIST CHAIR.
17	MAJOR AND A MINOR ARE FIGHTING EACH OTHER.	17	MR. KING: YOU MAY HAVE ANSWERED
18	THERE WE GO. GOING BACK TO HIS	18	ALL OF HIS QUESTIONS ALREADY.
19	SONG.	19	THE DEPONENT: JESUS CHRIST, IT'S
20	CAN'T DO THAT, MAJOR/MINOR.	20	AN IMPOSSIBILITY, MUSICALLY.
21	MOZART WOULD BE ROLLING IN HIS	21	MR. KING: OKAY. NOW LET'S WAIT
22	GRAVE RIGHT NOW,	21	
23	OOF, TERRIBLE.		FOR A QUESTION.
24	I WOULD RATHER HEAR YOU ASK ME	23	THE DEPONENT: OKAY.
25	QUESTIONS FOR TWO HOURS THAN LISTEN TO A MAJOR AND	24 25	(CONCLUSION OF AUDIO CLIP.)
	ATTO TO THE THE HOUSE THAN EIGHER TO A MAJOR AND	45	111
	19		21



Kelli Norden and Associates Court Reporters 310.820.7733 phone 310.820.7933 fax 11835 W. Olympic Boulevard Suite 680t Los Angeles, California 90064 kna@kellinorden.com www.kellinorden.com

Case 2:13-cv-06004-JAK-AGR Document 122 Filed 09/15/14 Page 65 of 125 Page ID #:2634

CONFIDENTIAL DEPOSITION OF ROBIN THICKE

			
1	MR. BUSCH: THIS IS THE POINT.	1	THIS BEFORE?
2	MR. KING: IT WON'T	2	
3	THE DEPONENT: YEAH.	1	MR. KING: WHY SHOULD HE WAIT FOR
4	MR. KING: IT WON'T HAPPEN THAT	3	YOU? HE DOESN'T WAIT FOR ME.
5	WAY.	4	THE DEPONENT: I DON'T GIVE A FUCK.
ll .		5	I KNOW YOU KNOW, YOU ASKED THE QUESTION THREE
6	THE DEPONENT: OKAY, ASK ME THE	6	TIMES. I DO NOT KNOW OF ANYBODY WHO HAS SAID THAT
7	NEXT ONE.	7	PUBLICLY. I DO NOT KNOW.
8	BY MR, BUSCH:	8	BY MR. BUSCH:
9	Q. ISN'T STEVIE WONDER A PERSONAL	9	Q. YOU JUST SAID FORMIDABLE SONG WRITER
10	FRIENDS OF YOURS?	10	WHO YOU RESPECT.
11	A. NO, HE'S NOT, ACTUALLY.	11	WHAT I WANT TO KNOW IS: IS THERE
12	Q. DIDN'T YOU JUST SAY HE WAS A FRIEND	12	ANYONE THAT YOU HAVE HEARD WHO HAS SAID THAT
13	OF YOURS?	13	THEY'VE LISTENED TO THE TWO SONGS AND BELLEVE THAT
14	A. NO, I I HE'S AN ACQUAINTANCE.	14	"BLURRED LINES" IS A COPY OF "GOT TO GIVE IT UP"?
15	I'VE DONE HIS RADIO SHOW AND I'VE SEEN HIM AT A	15	A. HAVE YOU FINISHED ANSWER ASKING
16	FEW PARTIES.	16	THAT QUESTION YET?
17	Q. DON'T YOU THINK STEVIE WONDER DO	17	Q. WHEN I STOP
18	YOU KNOW IF STEVIE WONDER IF STEVIE WONDER IS A	18	A. THE ANSWER IS "NO."
19	FRIEND OF PHARRELL WILLIAMS?	19	Q. OKAY. WHEN I STOP SPEAKING, YOU'LL
20	A. I DO NOT KNOW THAT.	20	KNOW I FINISHED MY QUESTION, OKAY?
21	Q. DO YOU KNOW THERE ARE OTHER ARTISTS	21	A. OKAY,
22	WHO'VE COME OUT PUBLICLY AND STATED THAT THEY DO	22	Q. OKAY, NOW, YOU'RE TELLING ME
23	SOUND NEARLY IDENTICAL, THAT ONE	23	ONE DAY THIS CASE IS GOING TO GO BEFORE A JURY
24	(SPEAKING SIMULTANEOUSLY.)	24	SO YOU ASKED ME WHO "THEY" ARE?
25	THE DEPONENT: I HAVE NEVER HEARD	25	
23	THE DEFONENT, THAVE NEVER HEARD	25	A. UH-HUH.
	26		28

1.	THAT.	1	Q. I'M ABOUT TO TELL YOU WHO "THEY"
2	BY MR. BUSCH:	2	ARE.
3	Q. OKAY. YOU'VE NEVER HEARD THAT	3	MR. KING: OBJECTION; ASSUMES FACTS
4	ONCE?	4	NOT IN EVIDENCE.
5	A. I'VE NEVER HEARD	5	BY MR. BUSCH:
6	MR. KING: I OBJECT.	6	Q. OKAY. ONE DAY THIS CASE MAY GO TO
7	THE DEPONENT: OF ANY ANY	7	A JURY
8	ANY	8	MR. KING: MUCH BETTER,
9	MR, KING: I OBJECT.	9	BY MR. BUSCH:
10	THE DEPONENT: YEAH?	10	Q AND THERE WILL BE A JURY OF YOUR
11	MR, KING: I OBJECT,	11	PEERS WHO WILL LISTEN TO THIS MUSIC
12	THE DEPONENT: I HAVEN'T, I	12	A. YEAH.
13	HAVEN'T HEARD OF ANY FORMIDABLE SONGWRITER OR	13	Q AND WILL DECIDE WHETHER THEY
14	ARTIST THAT I RESPECT THAT HAS SAID THAT, NO.	14	BELIEVE THAT THE BASS LINE AND OTHER PARTS OF
15	BY MR. BUSCH:	15	"BLURRED LINES" ARE SUBSTANTIALLY SIMILAR TO "GOT
16	Q. OKAY. I'M NOT TALKING ABOUT A	16	TO GIVE IT UP,"
17	FORMIDABLE SONGWRITER THAT YOU RESPECT.	17	
18		Į.	I WANT YOU TO TELL ME WHETHER YOU
H	LASKED YOU: IS THERE IS ANYBODY	18	BELIEVE THAT THE AVERAGE PERSON IN AN AUDIENCE,
19	THAT YOU HAVE HEARD PUBLICLY COME OUT AND	19	ORDINARY OBSERVER, COULD LISTEN TO THOSE TWO BASS
20	A. NO.	20	LINES AND BELIEVE THAT THEY HAD ANYTHING THAT
21	Q STATE THAT THEY'VE LISTENED	21	THEY SOUNDED REMOTELY THE SAME.
22	TO	22	YOU DON'T BELIEVE THAT THAT'S THE
23	A. NO, NOT A SINGLE ONE.	23	CASE?
24	Q. YOU GOT TO WAIT UNTIL I FINISH	24	A. NO,1 DO NOT.
25	ASKING MY QUESTION. REMEMBER, WE TALKED ABOUT	25	Q. OKAY. DID YOU TELL PHARRELL
	OT.		
lŧ	27	1	29



Kelli Norden and Associates Court Reporters 310.820.7733 phone 310.820.7933 fex 11839 W. Olympic Boulevard Suite 680t Los Angeles, California 90064 kna®kellinorden.com www.kellinorden.com

Case 2:13-cv-06004-JAK-AGR Document 122 Filed 09/15/14 Page 66 of 125 Page ID #:2635

CONFIDENTIAL DEPOSITION OF ROBIN THICKE

			1 101 101 1 10
7	WILLIAMS TO TRY TO CREATE SOMETHING THAT WAS LIKE	_	THE TRUTTED IS THAT WILLAT VOLUDE SAVINGS
1 2	"GOT TO GIVE IT UP"?	1	THE TRUTH? IS THAT WHAT YOU'RE SAYING?
1		2	A. I I THOUGHT YOU WERE GOING
3	A. NO, I	3	TO ASK ME QUESTIONS ABOUT THIS CASE.
4	MR. KING: YOU'VE ANSWERED THE	4	Q. THIS IS ALL THIS IS VERY MUCH
5	QUESTION, IT'S A "YES" OR "NO" QUESTION, PLEASE.	5	ABOUT THIS CASE.
6	THE DEPONENT: NO.	6	A. RIGHT.
7	MR. KING: HE'LL ASK YOU ALL THE	7	Q. DO YOU PICK AND CHOOSE WHEN TO TELL
8	QUESTIONS.	8	THE TRUTH?
9	THE DEPONENT: THAT'S FINE.	9	A. ABSOLUTELY NOT. I TOLD MY WIFE THE
10	MR. KING: YOU DON'T NEED TO	1.0	TRUTH. THAT'S WHY SHE LEFT ME.
11	THE DEPONENT: THAT'S FINE.	11	MR. KING: OKAY. JUST JUST
12	MR. KING: ANTICIPATE	12	ANSWER HIS QUESTIONS
13	MR. BUSCH: YEAH, PLEASE DO NOT	13	THE DEPONENT: I'M HAVING FUN. I'M
14	INTERRUPT HIS ANSWER IN THE MIDDLE OF HIS ANSWER.	14	TRYING
15	HE WAS HE WAS IN THE MIDDLE OF ANSWERING IT	15	MR. KING: WELL
16	AND YOU STOPPED HIM.	16	THE DEPONENT: TO KEEP IT LIGHT.
17	MR. KING: YOU WOULD HAVE STRICKEN	17	MR. KING: OKAY. YOU
18	IT AS NONNRESPONSIVE.	18	THE DEPONENT: YOU GOTTA HE'S
19	(SPEAKING SIMULTANEOUSLY.)	19	GOTTA BE A DICK TO DO HIS JOB. BUT I CAN STILL
20	MR. BUSCH: MAYBE I	20	MR. KING: WE'RE JUST NOT GOING TO
21	MR, KING; YOU ASKED HIM	21	GET OUT OF HERE IF YOU DON'T JUST ANSWER HIS
22	MR. BUSCH: WOULD HAVE AND	22	QUESTIONS. YOU DON'T NEED TO VOLUNTEER
23	MAYBE	23	THE DEPONENT: OKAY.
24	MR, KING: OR "NO" QUESTION.	24	MR. KING: ANYTHING.
25	WELL, THAT'S OKAY. WE'RE GOING TO	25	THE DEPONENT: ALL RIGHT.
			THE DELIGITATION AND A STREET AND A STREET
	30		32
1	GET THIS DOWN SO	1	MR. KING: NO STREAM OF CONSCIENCE.
2	THE DEPONENT: THE ANSWER IS "NO."	2	THE DEPONENT; I DON'T HAVE
3	MR. KING: ANSWER HIS QUESTIONS AS	3	ANYTHING TO HIDE.
4	YOU HEAR THEM. WAIT FOR MY OBJECTIONS, IF YOU	4	BY MR, BUSCH:
5	CAN.	5	Q. SIR, PLEASE DO NOT MAKE COMMENTS
6	BY MR. BUSCH:		·
H	DT WITH DOOGTI.	6	LIKE THAT ON THE RECORD. I'M REPRESENTING MY
7	Q. DID YOU HAVE ANY CONVERSATION WITH	6 7	
8		1	LIKE THAT ON THE RECORD. I'M REPRESENTING MY
}	Q. DID YOU HAVE ANY CONVERSATION WITH	7	LIKE THAT ON THE RECORD. I'M REPRESENTING MY CLIENTS, NONA AND FRANKIE GAYE, THE CHILDREN OF
8	Q. DID YOU HAVE ANY CONVERSATION WITH PHARRELL WILLIAMS DURING OR BEFORE THE CREATION OF	7 8	LIKE THAT ON THE RECORD. I'M REPRESENTING MY CLIENTS, NONA AND FRANKIE GAYE, THE CHILDREN OF MARVIN GAYE, WHO BELIEVE IN THE SONG, WHO
8 9	Q. DID YOU HAVE ANY CONVERSATION WITH PHARRELL WILLIAMS DURING OR BEFORE THE CREATION OF "BLURRED LINES" IN WHICH YOU DISCUSSED WITH HIM	7 8 9	LIKE THAT ON THE RECORD. I'M REPRESENTING MY CLIENTS, NONA AND FRANKIE GAYE, THE CHILDREN OF MARVIN GAYE, WHO BELIEVE IN THE SONG, WHO BELIEVE
8 9 10	Q. DID YOU HAVE ANY CONVERSATION WITH PHARRELL WILLIAMS DURING OR BEFORE THE CREATION OF "BLURRED LINES" IN WHICH YOU DISCUSSED WITH HIM MARVIN GAYE'S SONG "GOT TO GIVE IT UP"?	7 8 9 10	LIKE THAT ON THE RECORD. I'M REPRESENTING MY CLIENTS, NONA AND FRANKIE GAYE, THE CHILDREN OF MARVIN GAYE, WHO BELIEVE IN THE SONG, WHO BELIEVE (SPEAKING SIMULTANEOUSLY.)
8 9 10 11	Q. DID YOU HAVE ANY CONVERSATION WITH PHARRELL WILLIAMS DURING OR BEFORE THE CREATION OF "BLURRED LINES" IN WHICH YOU DISCUSSED WITH HIM MARVIN GAYE'S SONG "GOT TO GIVE IT UP"? A. NO.	7 8 9 10 11	LIKE THAT ON THE RECORD. I'M REPRESENTING MY CLIENTS, NONA AND FRANKIE GAYE, THE CHILDREN OF MARVIN GAYE, WHO BELIEVE IN THE SONG, WHO BELIEVE (SPEAKING SIMULTANEOUSLY.) THE DEPONENT: OKAY.
8 9 10 11 12	Q. DID YOU HAVE ANY CONVERSATION WITH PHARRELL WILLIAMS DURING OR BEFORE THE CREATION OF "BLURRED LINES" IN WHICH YOU DISCUSSED WITH HIM MARVIN GAYE'S SONG "GOT TO GIVE IT UP"? A. NO. Q. DO YOU CONSIDER YOURSELF AN HONEST	7 8 9 10 11 12	LIKE THAT ON THE RECORD. I'M REPRESENTING MY CLIENTS, NONA AND FRANKIE GAYE, THE CHILDREN OF MARVIN GAYE, WHO BELIEVE IN THE SONG, WHO BELIEVE (SPEAKING SIMULTANEOUSLY.) THE DEPONENT: OKAY. BY MR. BUSCH:
8 9 10 11 12 13	Q. DID YOU HAVE ANY CONVERSATION WITH PHARRELL WILLIAMS DURING OR BEFORE THE CREATION OF "BLURRED LINES" IN WHICH YOU DISCUSSED WITH HIM MARVIN GAYE'S SONG "GOT TO GIVE IT UP"? A. NO. Q. DO YOU CONSIDER YOURSELF AN HONEST PERSON?	7 8 9 10 11 12 13	LIKE THAT ON THE RECORD. I'M REPRESENTING MY CLIENTS, NONA AND FRANKIE GAYE, THE CHILDREN OF MARVIN GAYE, WHO BELIEVE IN THE SONG, WHO BELIEVE (SPEAKING SIMULTANEOUSLY.) THE DEPONENT: OKAY. BY MR. BUSCH: Q THEIR FATHER'S MUSIC A. IT'S NOT YOU'RE NOT LISTEN,
8 9 10 11 12 13 14	Q. DID YOU HAVE ANY CONVERSATION WITH PHARRELL WILLIAMS DURING OR BEFORE THE CREATION OF "BLURRED LINES" IN WHICH YOU DISCUSSED WITH HIM MARVIN GAYE'S SONG "GOT TO GIVE IT UP"? A. NO. Q. DO YOU CONSIDER YOURSELF AN HONEST PERSON? A. NO. THAT'S WHY I'M SEPARATED.	7 8 9 10 11 12 13 14	LIKE THAT ON THE RECORD. I'M REPRESENTING MY CLIENTS, NONA AND FRANKIE GAYE, THE CHILDREN OF MARVIN GAYE, WHO BELIEVE IN THE SONG, WHO BELIEVE (SPEAKING SIMULTANEOUSLY.) THE DEPONENT: OKAY. BY MR. BUSCH: Q THEIR FATHER'S MUSIC
8 9 10 11 12 13 14 15	Q. DID YOU HAVE ANY CONVERSATION WITH PHARRELL WILLIAMS DURING OR BEFORE THE CREATION OF "BLURRED LINES" IN WHICH YOU DISCUSSED WITH HIM MARVIN GAYE'S SONG "GOT TO GIVE IT UP"? A. NO. Q. DO YOU CONSIDER YOURSELF AN HONEST PERSON? A. NO. THAT'S WHY I'M SEPARATED. Q. DO YOU MAKE IT A HABIT OF BEING	7 8 9 10 11 12 13 14 15	LIKE THAT ON THE RECORD. I'M REPRESENTING MY CLIENTS, NONA AND FRANKIE GAYE, THE CHILDREN OF MARVIN GAYE, WHO BELIEVE IN THE SONG, WHO BELIEVE (SPEAKING SIMULTANEOUSLY.) THE DEPONENT: OKAY. BY MR. BUSCH: Q THEIR FATHER'S MUSIC A. IT'S NOT YOU'RE NOT LISTEN, YOU'RE NOT BEING A PLEASANT PERSON.
8 9 10 11 12 13 14 15	Q. DID YOU HAVE ANY CONVERSATION WITH PHARRELL WILLIAMS DURING OR BEFORE THE CREATION OF "BLURRED LINES" IN WHICH YOU DISCUSSED WITH HIM MARVIN GAYE'S SONG "GOT TO GIVE IT UP"? A. NO. Q. DO YOU CONSIDER YOURSELF AN HONEST PERSON? A. NO. THAT'S WHY I'M SEPARATED. Q. DO YOU MAKE IT A HABIT OF BEING DISHONEST WHEN YOU GIVE INTERVIEWS?	7 8 9 10 11 12 13 14 15 16	LIKE THAT ON THE RECORD. I'M REPRESENTING MY CLIENTS, NONA AND FRANKIE GAYE, THE CHILDREN OF MARVIN GAYE, WHO BELIEVE IN THE SONG, WHO BELIEVE (SPEAKING SIMULTANEOUSLY.) THE DEPONENT: OKAY. BY MR. BUSCH: Q THEIR FATHER'S MUSIC A. IT'S NOT YOU'RE NOT LISTEN, YOU'RE NOT BEING A PLEASANT PERSON. Q. I'M ASKING
8 9 10 11 12 13 14 15 16	Q. DID YOU HAVE ANY CONVERSATION WITH PHARRELL WILLIAMS DURING OR BEFORE THE CREATION OF "BLURRED LINES" IN WHICH YOU DISCUSSED WITH HIM MARVIN GAYE'S SONG "GOT TO GIVE IT UP"? A. NO. Q. DO YOU CONSIDER YOURSELF AN HONEST PERSON? A. NO. THAT'S WHY I'M SEPARATED. Q. DO YOU MAKE IT A HABIT OF BEING DISHONEST WHEN YOU GIVE INTERVIEWS? A. WHEN I DO WHEN I GIVE	7 8 9 10 11 12 13 14 15 16 17	LIKE THAT ON THE RECORD. I'M REPRESENTING MY CLIENTS, NONA AND FRANKIE GAYE, THE CHILDREN OF MARVIN GAYE, WHO BELIEVE IN THE SONG, WHO BELIEVE (SPEAKING SIMULTANEOUSLY.) THE DEPONENT: OKAY. BY MR. BUSCH: Q THEIR FATHER'S MUSIC A. IT'S NOT YOU'RE NOT LISTEN, YOU'RE NOT BEING A PLEASANT PERSON. Q. I'M ASKING A. YOU CAN STILL DO YOUR JOB
9 10 11 12 13 14 15 16 17 18	Q. DID YOU HAVE ANY CONVERSATION WITH PHARRELL WILLIAMS DURING OR BEFORE THE CREATION OF "BLURRED LINES" IN WHICH YOU DISCUSSED WITH HIM MARVIN GAYE'S SONG "GOT TO GIVE IT UP"? A. NO. Q. DO YOU CONSIDER YOURSELF AN HONEST PERSON? A. NO. THAT'S WHY I'M SEPARATED. Q. DO YOU MAKE IT A HABIT OF BEING DISHONEST WHEN YOU GIVE INTERVIEWS? A. WHEN I DO WHEN I GIVE INTERVIEWS, I TELL WHATEVER I WANT TO SAY TO HELP	7 8 9 10 11 12 13 14 15 16 17 18	LIKE THAT ON THE RECORD. I'M REPRESENTING MY CLIENTS, NONA AND FRANKIE GAYE, THE CHILDREN OF MARVIN GAYE, WHO BELIEVE IN THE SONG, WHO BELIEVE (SPEAKING SIMULTANEOUSLY.) THE DEPONENT: OKAY. BY MR. BUSCH: Q THEIR FATHER'S MUSIC A. IT'S NOT YOU'RE NOT LISTEN, YOU'RE NOT BEING A PLEASANT PERSON. Q. I'M ASKING A. YOU CAN STILL DO YOUR JOB PLEASANTLY.
8 9 10 11 12 13 14 15 16 17 18 19	Q. DID YOU HAVE ANY CONVERSATION WITH PHARRELL WILLIAMS DURING OR BEFORE THE CREATION OF "BLURRED LINES" IN WHICH YOU DISCUSSED WITH HIM MARVIN GAYE'S SONG "GOT TO GIVE IT UP"? A. NO. Q. DO YOU CONSIDER YOURSELF AN HONEST PERSON? A. NO. THAT'S WHY I'M SEPARATED. Q. DO YOU MAKE IT A HABIT OF BEING DISHONEST WHEN YOU GIVE INTERVIEWS? A. WHEN I DO WHEN I GIVE INTERVIEWS, I TELL WHATEVER I WANT TO SAY TO HELP SELL RECORDS.	7 8 9 10 11 12 13 14 15 16 17 18 19	LIKE THAT ON THE RECORD. I'M REPRESENTING MY CLIENTS, NONA AND FRANKIE GAYE, THE CHILDREN OF MARVIN GAYE, WHO BELIEVE IN THE SONG, WHO BELIEVE (SPEAKING SIMULTANEOUSLY.) THE DEPONENT: OKAY. BY MR. BUSCH: Q THEIR FATHER'S MUSIC A. IT'S NOT YOU'RE NOT LISTEN, YOU'RE NOT BEING A PLEASANT PERSON. Q. I'M ASKING A. YOU CAN STILL DO YOUR JOB PLEASANTLY. Q. I'M ASKING QUETIONS.
8 9 10 11 12 13 14 15 16 17 18 19 20	Q. DID YOU HAVE ANY CONVERSATION WITH PHARRELL WILLIAMS DURING OR BEFORE THE CREATION OF "BLURRED LINES" IN WHICH YOU DISCUSSED WITH HIM MARVIN GAYE'S SONG "GOT TO GIVE IT UP"? A. NO. Q. DO YOU CONSIDER YOURSELF AN HONEST PERSON? A. NO. THAT'S WHY I'M SEPARATED. Q. DO YOU MAKE IT A HABIT OF BEING DISHONEST WHEN YOU GIVE INTERVIEWS? A. WHEN I DO WHEN I GIVE INTERVIEWS, I TELL WHATEVER I WANT TO SAY TO HELP SELL RECORDS. Q. YOU SAY THE SAME THING WHEN YOU	7 8 9 10 11 12 13 14 15 16 17 18 19 20	LIKE THAT ON THE RECORD. I'M REPRESENTING MY CLIENTS, NONA AND FRANKIE GAYE, THE CHILDREN OF MARVIN GAYE, WHO BELIEVE IN THE SONG, WHO BELIEVE (SPEAKING SIMULTANEOUSLY.) THE DEPONENT: OKAY. BY MR. BUSCH: Q THEIR FATHER'S MUSIC A. IT'S NOT YOU'RE NOT LISTEN, YOU'RE NOT BEING A PLEASANT PERSON. Q. I'M ASKING A. YOU CAN STILL DO YOUR JOB PLEASANTLY. Q. I'M ASKING QUETIONS. A. THAT'S FINE. Q. THAT'S ALL I'M DOING.
8 9 10 11 12 13 14 15 16 17 18 19 20 21	Q. DID YOU HAVE ANY CONVERSATION WITH PHARRELL WILLIAMS DURING OR BEFORE THE CREATION OF "BLURRED LINES" IN WHICH YOU DISCUSSED WITH HIM MARVIN GAYE'S SONG "GOT TO GIVE IT UP"? A. NO. Q. DO YOU CONSIDER YOURSELF AN HONEST PERSON? A. NO. THAT'S WHY I'M SEPARATED. Q. DO YOU MAKE IT A HABIT OF BEING DISHONEST WHEN YOU GIVE INTERVIEWS? A. WHEN I DO WHEN I GIVE INTERVIEWS, I TELL WHATEVER I WANT TO SAY TO HELP SELL RECORDS. Q. YOU SAY THE SAME THING WHEN YOU TESTIFY TO WIN A CASE?	7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22	LIKE THAT ON THE RECORD. I'M REPRESENTING MY CLIENTS, NONA AND FRANKIE GAYE, THE CHILDREN OF MARVIN GAYE, WHO BELIEVE IN THE SONG, WHO BELIEVE (SPEAKING SIMULTANEOUSLY.) THE DEPONENT: OKAY. BY MR. BUSCH: Q THEIR FATHER'S MUSIC A. IT'S NOT YOU'RE NOT LISTEN, YOU'RE NOT BEING A PLEASANT PERSON. Q. I'M ASKING A. YOU CAN STILL DO YOUR JOB PLEASANTLY. Q. I'M ASKING QUETIONS. A. THAT'S FINE. Q. THAT'S ALL I'M DOING. (SPEAKING SIMULTANEOUSLY.)
8 9 10 11 12 13 14 15 16 17 18 19 20 21 22	Q. DID YOU HAVE ANY CONVERSATION WITH PHARRELL WILLIAMS DURING OR BEFORE THE CREATION OF "BLURRED LINES" IN WHICH YOU DISCUSSED WITH HIM MARVIN GAYE'S SONG "GOT TO GIVE IT UP"? A. NO. Q. DO YOU CONSIDER YOURSELF AN HONEST PERSON? A. NO. THAT'S WHY I'M SEPARATED. Q. DO YOU MAKE IT A HABIT OF BEING DISHONEST WHEN YOU GIVE INTERVIEWS? A. WHEN I DO WHEN I GIVE INTERVIEWS, I TELL WHATEVER I WANT TO SAY TO HELP SELL RECORDS. Q. YOU SAY THE SAME THING WHEN YOU TESTIFY TO WIN A CASE? A. NO. ABSOLUTELY NOT.	7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23	LIKE THAT ON THE RECORD. I'M REPRESENTING MY CLIENTS, NONA AND FRANKIE GAYE, THE CHILDREN OF MARVIN GAYE, WHO BELIEVE IN THE SONG, WHO BELIEVE (SPEAKING SIMULTANEOUSLY.) THE DEPONENT: OKAY. BY MR. BUSCH: Q THEIR FATHER'S MUSIC A. IT'S NOT YOU'RE NOT LISTEN, YOU'RE NOT BEING A PLEASANT PERSON. Q. I'M ASKING A. YOU CAN STILL DO YOUR JOB PLEASANTLY. Q. I'M ASKING QUETIONS. A. THAT'S FINE. Q. THAT'S ALL I'M DOING. (SPEAKING SIMULTANEOUSLY.) BY MR. BUSCH:
8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23	Q. DID YOU HAVE ANY CONVERSATION WITH PHARRELL WILLIAMS DURING OR BEFORE THE CREATION OF "BLURRED LINES" IN WHICH YOU DISCUSSED WITH HIM MARVIN GAYE'S SONG "GOT TO GIVE IT UP"? A. NO. Q. DO YOU CONSIDER YOURSELF AN HONEST PERSON? A. NO. THAT'S WHY I'M SEPARATED. Q. DO YOU MAKE IT A HABIT OF BEING DISHONEST WHEN YOU GIVE INTERVIEWS? A. WHEN I DO WHEN I GIVE INTERVIEWS, I TELL WHATEVER I WANT TO SAY TO HELP SELL RECORDS. Q. YOU SAY THE SAME THING WHEN YOU TESTIFY TO WIN A CASE? A. NO. ABSOLUTELY NOT. Q. RIGHT. A. JESUS.	7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23 24	LIKE THAT ON THE RECORD. I'M REPRESENTING MY CLIENTS, NONA AND FRANKIE GAYE, THE CHILDREN OF MARVIN GAYE, WHO BELIEVE IN THE SONG, WHO BELIEVE (SPEAKING SIMULTANEOUSLY.) THE DEPONENT: OKAY. BY MR. BUSCH: Q THEIR FATHER'S MUSIC A. IT'S NOT YOU'RE NOT LISTEN, YOU'RE NOT BEING A PLEASANT PERSON. Q. I'M ASKING A. YOU CAN STILL DO YOUR JOB PLEASANTLY. Q. I'M ASKING QUETIONS. A. THAT'S FINE. Q. THAT'S ALL I'M DOING. (SPEAKING SIMULTANEOUSLY.) BY MR. BUSCH: Q. YOU MAY NOT LIKE MY QUESTIONS
8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23 24	Q. DID YOU HAVE ANY CONVERSATION WITH PHARRELL WILLIAMS DURING OR BEFORE THE CREATION OF "BLURRED LINES" IN WHICH YOU DISCUSSED WITH HIM MARVIN GAYE'S SONG "GOT TO GIVE IT UP"? A. NO. Q. DO YOU CONSIDER YOURSELF AN HONEST PERSON? A. NO. THAT'S WHY I'M SEPARATED. Q. DO YOU MAKE IT A HABIT OF BEING DISHONEST WHEN YOU GIVE INTERVIEWS? A. WHEN I DO WHEN I GIVE INTERVIEWS, I TELL WHATEVER I WANT TO SAY TO HELP SELL RECORDS. Q. YOU SAY THE SAME THING WHEN YOU TESTIFY TO WIN A CASE? A. NO. ABSOLUTELY NOT. Q. RIGHT.	7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23	LIKE THAT ON THE RECORD. I'M REPRESENTING MY CLIENTS, NONA AND FRANKIE GAYE, THE CHILDREN OF MARVIN GAYE, WHO BELIEVE IN THE SONG, WHO BELIEVE (SPEAKING SIMULTANEOUSLY.) THE DEPONENT: OKAY. BY MR. BUSCH: Q THEIR FATHER'S MUSIC A. IT'S NOT YOU'RE NOT LISTEN, YOU'RE NOT BEING A PLEASANT PERSON. Q. I'M ASKING A. YOU CAN STILL DO YOUR JOB PLEASANTLY. Q. I'M ASKING QUETIONS. A. THAT'S FINE. Q. THAT'S ALL I'M DOING. (SPEAKING SIMULTANEOUSLY.) BY MR. BUSCH:



Kelli Norden and Associates Court Reporters 310.820.7733 phone 310.820.7933 Fax 11833 W. Olympic Boulevard Suite 680E Los Angeles, California 90064 kna8kellinorden.com

Case 2:13-cv-06004-JAK-AGR Document 122 Filed 09/15/14 Page 67 of 125 Page ID #:2636

CONFIDENTIAL DEPOSITION OF ROBIN THICKE

		1	
1	Q. OKAY.	1	WHY DID YOU SAY YOU CANNOT COMBINE THAT IF YOU
2	A. I WANT YOU TO SHOW SOME SOME	2	COULD NOT HEAR BASS?
3	SOME RESPECT AND	3	A. WELL, BECAUSE THE THE THE
4	Q I'M SHOWING ABSOLUTE RESPECT.	4	MUSICAL INSTRUMENT, THE WURLITZER OR RHODES,
5	A. OKAY, BE KIND, YOU CAN STILL ASK	5	WHATEVER IS PLAYING THE CHORDS, IS A MINOR CHORD
6	THE SAME QUESTIONS WITH KINDNESS. THAT'S	6	AND THE VOCALS ARE A MAJOR CHORD, WHICH IS AN
7	Q DO YOU -	7	IMPOSSIBILITY IN MUSIC AND WHY THE TWO SONGS
8	A FINE.	8	CANNOT BE PLAYED SIMULTANEOUSLY.
		9	Q. OKAY. BUT IF I PLAYED THIS FOR YOU
9	Q DO YOU MAKE IT A HABIT OF PICKING	1	
10	AND CHOOSING WHEN TO TELL THE TRUTH?	10	OVER THE LOUD SPEAKER IN THIS ROOM
11	A. ABSOLUTELY NOT.	11	A. UH-HUH.
12	Q OKAY.	12	Q DO YOU THINK YOU COULD BE ABLE
13	A. THIS IS THE - THIS IS	13	TO TELL ME WHICH BASS LINE YOU HEARD?
14	MR. KING: THIS IS	14	A. YES, I THINK SO.
1.5	THE DEPONENT: - UNDER OATH.	15	Q. LET'S DO THAT, THEN.
16	MR. KING: OKAY.	16	CAN WE GET THIS TO THE E-MAIL AS AN
17	BY MR. BUSCH:	17	ATTACHMENT?
18	Q. I'M GOING TO PLAY THE FIRST TRACK	18	(WHEREUPON, AN AUDIO CLIP PLAYED.)
19	OF THAT I PLAYED FORYOU A SECOND AGO AND IM	19	THE DEPONENT: YEAH, I MEAN, WHEN
20	GOING TO STOP ITAFTER A MINUTE OR TWO.	20	YOU PLAY MUSIC LIKE THAT, IT'S LIKE BEING ATTACKED
21	(WHEREUPON, AN AUDIO CLIP PLAYED.)	21	WITH KNIVES AND SWORDS. YOU CAN'T A MUSICIAN
22	THE DEPONENT: OH, YOU CAN'T DO	22	CAN'T HEAR THOSE TWO CLASHES. MINOR OVER MAJOR.
23	THAT MUSICALLY.	23	IT'S AN IMPOSSIBILITY.
24	(CONCLUSION OF AUDIO CLIP.)	24	(CONCLUSION OF AUDIO CLIP.)
25	111	25	THE DEPONENT: OH, ENTERTAINERS.
			·
	34		36
1	BY MR. BUSCH:	1	MR, KING: JUST
2	Q. WHOSE BASS LINE WAS PLAYING IN THE	2	THE DEPONENT: I'M HAVING FUN.
3	MUSIC YOU JUST LISTENED TO?	3	MR. KING: WELL, YOUR FUN MIGHT BE
II		1	MY PAIN LATER. SO LET'S NOT HAVE TOO MUCH FUN.
4	A. I COULDN'T TELL.	4	
5	Q. WAS THAT THE BASS LINE FROM "GOT TO	5	THE DEPONENT: I'M A BIG BOY, I'M
6	GIVE IT UP" OR WAS IT THE BASS LINE FROM "BLURRED	6	A BIG BOY,
7	LINES"?	7	MR. KING: OKAY. GOOD.
8	A. I COULD NOT TELL. THE VOCAL AND	8	THE DEPONENT: NO PAIN INVOLVED IN
9	THE CHORDS WERE OVERWHELMINGLY INAPPROPRIATE.	9	THIS.
10	Q. SO JUST TO BE CLEAR, IN WHAT I JUST	10	MR, KING: I KNOW, I KNOW.
11	PLAYED FOR YOU, YOU COULD NOT TELL ME WHOSE BASS	11	THE DEPONENT: IT'S ALL DOLLARS AND
12	LINE WAS PLAYING, WHETHER IT WAS "BLURRED LINES"	12	CENTS. EVERYONE IN THIS ROOM HAS A HOUSE AND A
13	OR "GOT TO GIVE IT UP"; CORRECT?	13	FUCKING CAR.
14	A. NO, BECAUSE YOUR MACHINE YOU'RE	14	MR. MILLER: THAT'S TRUE.
15	USING DOESN'T HAVE ANY BASS IN IT.	15	THE DEPONENT: THERE'S BIGGER
16	Q. NONE? NO BASS LINE?	16	PROBLEMS. PENTHOUSE PROBLEMS.
17	A. YOU CAN'T TELL. YOU CAN'T HEAR IT	17	MR, MILLER: 1 WISH THEY'D STARTED
18	FROM THAT SPEAKER. IF YOU PUT IT ON A CORRECT	18	AT NOON.
19	SPEAKER THAT HAS ANY LOW END, I WOULD BE ABLE TO	19	THE DEPONENT: WELL, WHILE YOU GUYS
20	HEAR THE BASS LINE.	20	GET YOUR TECHNOLOGY TOGETHER
21	Q. SO YOU DIDN'T HEAR ANY BASS LINE?	21	MR. KING: TAKE YOUR
22	A. YOU CAN'T HEAR IT ON AN IPAD LIKE	22	THE DEPONENT: I WILL HAVE A
23	THAT, IF YOU GUYS WANT TO GET A BIGGER SPEAKER,	23	CIGARETTE BREAK
24	PLAY IT FOR ME APPROPRIATELY.	24	MR. KING: TAKE YOUR
25	Q. YOU SAID THAT YOU HEARD A CLASH.	25	THE DEPONENT: IF THAT'S OKAY.
II ~~	C, 100 OND HIM TOO HE WON OUR.	"-	HEPE OHEAT II HILL OUTER.
11		1	



Kelli Norden and Associates Court Reporters 310.820.7733 phone 310.820.7933 fax 11839 W. Olympic Boulevard Suite 680t Los Angeles, California 9006+ kna&kellinorden.com

Case 2:13-cv-06004-JAK-AGR Document 122 Filed 09/15/14 Page 68 of 125 Page ID #:2637

CONFIDENTIAL DEPOSITION OF ROBIN THICKE

		1	
1	MR. MILLER: EVERY TIME YOU TALK,	1	WERE GOING. I WAS LISTENING TO MARVIN'S VOCAL AND
2	YOU MAKE WORK FOR HER.	2	THE BASS LINE.
3	THE DEPONENT: MAN.	3	Q. OKAY,
4	(WHEREUPON, AN AUDIO CLIP PLAYED.)	4	A. IF YOU'D LIKE TO PLAY IT FOR ME
5	BY MR. BUSCH:	5	AGAIN
6	Q. YOU HEARD THE "HEY, HEY, HEY" WITH	6	Q. I'LL JUST KEEP ON GOING, I THINK.
7	THE MARVIN VOCAL, "I USED TO GO OUT TO PARTIES"?	7	A. OKAY.
8	A. YES, SIR.	ì	
9	Q. OKAY. WHOSE BASS LINE WAS PLAYING	8	Q. ALL RIGHT. NEXT SECTION, I'LL PLAY
10		1 -	FOR YOU.
il	OVER THAT OVER THOSE VOCALS?	10	A. OKAY.
11	A. THAT WAS DEFINITELY THE "BLURRED	1.1	(WHEREUPON, AN AUDIO CLIP PLAYED.)
12	LINES" BASS LINE.	12	THE DEPONENT: GEEZ.
13	Q. OKAY.	13	BY MR. BUSCH;
14	A. BECAUSE MARVIN GAYE WOULD NEVER	14	Q. OKAY. DID YOU HEAR TOWARD THE END
15	SING OUT OF TUNE.	15	OF WHAT I JUST PLAYED FOR YOU
16	Q. I'M GOING TO PLAY THE NEXT SECTION	16	A. YES.
17	NOW.	17	Q YOUR VOCALS?
18	MR. KING: THERE'S NO THERE'S A	18	A. I HEARD MY VOCAL, I DID HEAR THE
19	WHITE LIGHT THAT'S GOING TO FLASH	19	"HEY, HEY, HEY""S.
20	THE DEPONENT: I KNOW.	20	Q. OKAY. AND WHOSE BASS LINE WAS
21	MR. KING: OKAY.	21	PLAYING AT THAT POINT?
22	THE DEPONENT: OKAY.	22	A. IT CHANGED, I BELIEVE, IN THE
23	BY MR. BUSCH:	23	MIDDLE OF WHAT YOU WERE JUST PLAYING, I BELIEVE
24	Q. PLAYING THE NEXT SECTION NOW,	24	THAT IT WENT FROM THE "BLURRED LINES" BASS LINE
25	MR	25	INTO THE MARVIN GAYE BASS LINE WHILE
		43	110 O THE MAINTH OATE DAGS LINE VALIES
a special state or foundation reasons.	42		44
1	A. YES, SIR.	1	O OVAV
2	Q. OKAY.	Į	Q. OKAY.
3	(WHEREUPON, AN AUDIO CLIP PLAYED.)	2	A DURING THE MOMENT YOU JUST
	· · · · · · · · · · · · · · · · · · ·	3	PLAYED, BECAUSE IT CHANGED. IT WENT TO MY VOCAL
4	THE DEPONENT: OH. OH.	4	OVER HIS BASS LINE. IT SWITCHED
5	(CONCLUSION OF AUDIO CLIP.)	5	Q. OKAY.
6	BY MR, BUSCH:	6	A FROM MY BASS LINE AND HIS VOCAL
7	Q. ALL RIGHT, I GOT IT.	7	TO MY VOCAL AND HIS BASS LINE.
8	YOU HEARD THE VOCAL, "I USED TO GO	8	Q. NOW THAT YOU CAN HEAR THE BASS
9	OUT TO PARTIES," FOLLOWED BY ANOTHER VOCAL FROM	9	LINES
10	MARVIN GAYE; CORRECT?	10	A. UH-HUH.
11	A. YES, SIR.	11	Q I'M GOING TO ASK YOU WHAT I
12	Q. WHAT WAS THE SECOND VOCAL THAT YOU	12	ASKED YOU BEFORE THE BREAK
13	HEARD?	13	A. YES.
14	A. OOH, "I USED TO GO TO PARTIES AND	14	Q WHICH IS: DO YOU BELIEVE THAT
15	STAND AROUND."	15	THE BASS LINES SOUND SIMILAR?
16	Q. OKAY, AND WHOSE BASS LINE WAS	16	A. IT IS A MUSICAL IMPOSSIBILITY. NO.
17	PLAYING AT THAT POINT?	17	Q. SO SEPARATE AND APART FROM BEING A
18	A. SORRY, IT JUST NOW, IT WAS	18	MUSICAL IMPOSSIBILITY
19	DEFINITELY THE "BLURRED LINES" BASS LINE AGAIN	19	
20	UNDERNEATH MARVIN GAYE'S VOCAL.		A. YES, SIR.
21	Q. OKAY.	20	Q I'M GOING TO ASK YOU WHY IN A
		21	SECOND
22	A. BECAUSE HE WAS OUT OF TUNE.	22	A. OKAY.
23	Q. AND THE "HEY, HEY, HEY" WAS GOING	23	 Q YOU DON'T BELIEVE THEY SOUND
24	AT THE SAME TIME?	24	SIMILAR AT ALL?
25	A. I DO NOT RECALL IF THE "HEY, HEY"'S	25	A. NOT EVEN CLOSE.
	. 12		
	43		<u></u> 45



Kelli Norden and Associates Court Reporters 310.820,7733 phone 310.820,7933 fax 11835 W. Olympic Boulevard Suite 680E Los Angeles, California 90064 kna#killinorden.com

		,	
1	O THEY COULD NOT BE CONSUMED FOR SUIT		THE DECONOR I AVII AND
1	Q. THEY COULD NOT BE CONFUSED FOR ONE	1	THE DEPONENT: I CAN'T SPEAK FOR
2	ANOTHER?	2	THE REST OF THE WORLD.
3	A. NOT AT ALL.	3	BY MR. BUSCH:
4	Q, OKAY,	4	Q. OKAY. WELL, YOU DID EARLIER.
5	ALL RIGHT. I'M GOING TO PLAY THE	5	A. NO, I DIDN'T.
6	NEXT SECTION.	6	Q. OKAY.
7	A. OKAY.	7	OKAY. I'M GOING TO PLAY THE NEXT
8	(WHEREUPON, AN AUDIO CLIP PLAYED.)	8	SECTION.
9	THE DEPONENT: OH. OH.	9	A. OKAY,
10	(CONCLUSION OF AUDIO CLIP.)	10	(WHEREUPON, AN AUDIO CLIP PLAYED.)
11	BY MR. BUSCH:	11	BY MR. BUSCH:
12	Q. IN THE SECTION I JUST PLAYED FOR	12	Q. IN THAT LAST SECTION, JUST BEFORE
13	YOU, WHICH VOCAL WHICH BASS LINE WAS PLAYING?	13	THE "I KEEP ON DANCING," WHOSE BASS LINE WAS THAT?
14	A. MARVIN GAYE'S. OR "GOT TO GIVE IT	14	A. THAT THAT IS AN UNRECOGNIZABLE
15	UP."	15	BASS LINE, BECAUSE OF THE MASH-UP THAT YOU GUYS
16	Q. AND WHAT IS RECOGNIZABLE TO YOU	16	HAVE CREATED, I COULDN'T TELL YOU WHERE THAT CAME
17	ABOUT MARVIN GAYE'S "GOT TO GIVE IT UP"? HOW DO	17	FROM. UNRECOGNIZABLE.
18	YOU KNOW THAT IT'S MARVIN GAYE'S "GOT TO GIVE IT	18	Q. SO YOU DON'T KNOW WHETHER THAT
19	UP"?	19	WAS
20	A. HIS VOCAL.	20	A. I WOULD
21	Q. I I UNDERSTAND YOU UNDERSTAND	21	Q "BLURRED LINES"?
22	THAT ARE YOU WHAT I'M ASKING YOU MAYBE	22	A. I WOULD THINK YOU GUYS MADE THAT
23	I'LL ASK A BETTER QUESTION.	23	UP.
24	A. OKAY.	24	Q. OKAY. LET ME JUST FINISH MY
25	Q. WHAT IDENTIFIES TO YOU MARVIN	25	QUESTION.
			·
	46		48
1	CAVE'S BASS LINE AS ADDOSED TO THE UDITIONS		A MA CORDIV TWO LOT AND
2	GAYE'S BASS LINE, AS OPPOSED TO THE "BLURRED LINES" BASS LINE?	1	A 17M SORRY. EXCUSE ME.
3		2	Q. YOU DON'T KNOW IF THAT WAS "BLURRED
	A. WELL, THEY'RE TWO COMPLETE	3	LINES" BASS LINE, "GOT TO GIVE IT UP" BASS LINE OR
4	DIFFERENT SYNCOPATIONS AND AND NOTE CHOICES,	4	A COMBINATION OF THE TWO? YOU CAN'T SAY?
5	EXCEPT AND DIFFERENT KEYS. ONE'S A MINOR KEY	5	A ITIT SOUNDED LIKE A BAND OF
6	AND ONE'S A MAJOR KEY. SO MUSICALLY, THEY HAVE NO RELEVANCE. THEY CAN'T BE SHARED.	6	
7	RELEVANCE THEY CAN'T BE SHARED	1	4-YEAR-OLDS TRYING TO MAKE A SONG.
		7	Q. OKAY.
8	WHAT YOU'RE PLAYING IS IS	7 8	Q. OKAY. A SO I CAN'T EVEN REGISTER THAT
9	WHAT YOU'RE PLAYING IS IS WHEN I SAY "MUSICAL IMPOSSIBILITY," YOU CAN'T PLAY	7 8 9	Q. OKAY. A SO I CAN'T EVEN REGISTER THAT SECTION.
9 10	WHAT YOU'RE PLAYING IS IS WHEN I SAY "MUSICAL IMPOSSIBILITY," YOU CAN'T PLAY ONE OVER THE OTHER AND AND IT EVER MAKE SENSE	7 8 9 10	Q. OKAY. A SO I CAN'T EVEN REGISTER THAT SECTION. Q. DON'T KNOW WHAT IT WAS?
9 10 11	WHAT YOU'RE PLAYING IS IS WHEN I SAY "MUSICAL IMPOSSIBILITY," YOU CAN'T PLAY ONE OVER THE OTHER AND AND IT EVER MAKE SENSE IN A BAND. THEY WOULD NEVER BE ABLE TO PLAY THE	7 8 9 10 11	Q. OKAY. A SO I CAN'T EVEN REGISTER THAT SECTION. Q. DON'T KNOW WHAT IT WAS? A HAVE NO IDEA.
9 10 11 12	WHAT YOU'RE PLAYING IS IS WHEN I SAY "MUSICAL IMPOSSIBILITY," YOU CAN'T PLAY ONE OVER THE OTHER AND AND IT EVER MAKE SENSE IN A BAND. THEY WOULD NEVER BE ABLE TO PLAY THE TWO AT THE SAME TIME.	7 8 9 10	Q. OKAY. A SO I CAN'T EVEN REGISTER THAT SECTION. Q. DON'T KNOW WHAT IT WAS?
9 10 11 12 13	WHAT YOU'RE PLAYING IS IS WHEN I SAY "MUSICAL IMPOSSIBILITY," YOU CAN'T PLAY ONE OVER THE OTHER AND AND IT EVER MAKE SENSE IN A BAND. THEY WOULD NEVER BE ABLE TO PLAY THE TWO AT THE SAME TIME. Q. AND SO THAT'S THE REASON AND IF	7 8 9 10 11	Q. OKAY. A SO I CAN'T EVEN REGISTER THAT SECTION. Q. DON'T KNOW WHAT IT WAS? A HAVE NO IDEA.
9 10 11 12	WHAT YOU'RE PLAYING IS IS WHEN I SAY "MUSICAL IMPOSSIBILITY," YOU CAN'T PLAY ONE OVER THE OTHER AND AND IT EVER MAKE SENSE IN A BAND. THEY WOULD NEVER BE ABLE TO PLAY THE TWO AT THE SAME TIME. Q. AND SO THAT'S THE REASON AND IF IT IS THE REASON, YOU JUST TELL ME. BUT IS THAT	7 8 9 10 11 12	Q. OKAY. A SO I CAN'T EVEN REGISTER THAT SECTION. Q. DON'T KNOW WHAT IT WAS? A HAVE NO IDEA. Q. OKAY. ALL RIGHT.
9 10 11 12 13	WHAT YOU'RE PLAYING IS IS WHEN I SAY "MUSICAL IMPOSSIBILITY," YOU CAN'T PLAY ONE OVER THE OTHER AND AND IT EVER MAKE SENSE IN A BAND. THEY WOULD NEVER BE ABLE TO PLAY THE TWO AT THE SAME TIME. Q. AND SO THAT'S THE REASON AND IF	7 8 9 10 11 12 13	Q. OKAY. A SO! CAN'T EVEN REGISTER THAT SECTION. Q. DON'T KNOW WHAT IT WAS? A HAVE NO IDEA. Q. OKAY. ALL RIGHT. ALL RIGHT. I'M GOING TO PLAY THE
9 10 11 12 13	WHAT YOU'RE PLAYING IS IS WHEN I SAY "MUSICAL IMPOSSIBILITY," YOU CAN'T PLAY ONE OVER THE OTHER AND AND IT EVER MAKE SENSE IN A BAND. THEY WOULD NEVER BE ABLE TO PLAY THE TWO AT THE SAME TIME. Q. AND SO THAT'S THE REASON AND IF IT IS THE REASON, YOU JUST TELL ME. BUT IS THAT THE REASON THAT YOU SAY THAT WHEN YOU HEAR THE TWO, THEY DON'T SOUND SIMILAR TO YOU AT ALL?	7 8 9 10 11 12 13	Q. OKAY. A SO! CAN'T EVEN REGISTER THAT SECTION. Q. DON'T KNOW WHAT IT WAS? A HAVE NO IDEA. Q. OKAY, ALL RIGHT. ALL RIGHT. I'M GOING TO PLAY THE NEXT SECTION.
9 10 11 12 13 14	WHAT YOU'RE PLAYING IS IS WHEN I SAY "MUSICAL IMPOSSIBILITY," YOU CAN'T PLAY ONE OVER THE OTHER AND AND IT EVER MAKE SENSE IN A BAND. THEY WOULD NEVER BE ABLE TO PLAY THE TWO AT THE SAME TIME. Q. AND SO THAT'S THE REASON AND IF IT IS THE REASON, YOU JUST TELL ME. BUT IS THAT THE REASON THAT YOU SAY THAT WHEN YOU HEAR THE TWO, THEY DON'T SOUND SIMILAR TO YOU AT ALL? A. YES, BECAUSE MUSICALLY, THERE IS NO	7 8 9 10 11 12 13 14 15	Q. OKAY. A SO I CAN'T EVEN REGISTER THAT SECTION. Q. DON'T KNOW WHAT IT WAS? A HAVE NO IDEA. Q. OKAY. ALL RIGHT. ALL RIGHT. I'M GOING TO PLAY THE NEXT SECTION. A YES, SIR.
9 10 11 12 13 14 15	WHAT YOU'RE PLAYING IS IS WHEN I SAY "MUSICAL IMPOSSIBILITY," YOU CAN'T PLAY ONE OVER THE OTHER AND AND IT EVER MAKE SENSE IN A BAND. THEY WOULD NEVER BE ABLE TO PLAY THE TWO AT THE SAME TIME. Q. AND SO THAT'S THE REASON AND IF IT IS THE REASON, YOU JUST TELL ME. BUT IS THAT THE REASON THAT YOU SAY THAT WHEN YOU HEAR THE TWO, THEY DON'T SOUND SIMILAR TO YOU AT ALL?	7 8 9 10 11 12 13 14 15	Q. OKAY. A SO! CAN'T EVEN REGISTER THAT SECTION. Q. DON'T KNOW WHAT IT WAS? A HAVE NO IDEA. Q. OKAY. ALL RIGHT. ALL RIGHT. I'M GOING TO PLAY THE NEXT SECTION. A YES, SIR. (WHEREUPON, AN AUDIO CLIP PLAYED.)
9 10 11 12 13 14 15 16	WHAT YOU'RE PLAYING IS IS WHEN I SAY "MUSICAL IMPOSSIBILITY," YOU CAN'T PLAY ONE OVER THE OTHER AND AND IT EVER MAKE SENSE IN A BAND. THEY WOULD NEVER BE ABLE TO PLAY THE TWO AT THE SAME TIME. Q. AND SO THAT'S THE REASON AND IF IT IS THE REASON, YOU JUST TELL ME. BUT IS THAT THE REASON THAT YOU SAY THAT WHEN YOU HEAR THE TWO, THEY DON'T SOUND SIMILAR TO YOU AT ALL? A. YES, BECAUSE MUSICALLY, THERE IS NO	7 8 9 10 11 12 13 14 15 16	Q. OKAY. A SO! CAN'T EVEN REGISTER THAT SECTION. Q. DON'T KNOW WHAT IT WAS? A HAVE NO IDEA. Q. OKAY. ALL RIGHT. ALL RIGHT. I'M GOING TO PLAY THE NEXT SECTION. A YES, SIR. (WHEREUPON, AN AUDIO CLIP PLAYED.) THE DEPONENT: OH. OH. OH.
9 10 11 12 13 14 15 16 17	WHAT YOU'RE PLAYING IS IS WHEN I SAY "MUSICAL IMPOSSIBILITY," YOU CAN'T PLAY ONE OVER THE OTHER AND AND IT EVER MAKE SENSE IN A BAND. THEY WOULD NEVER BE ABLE TO PLAY THE TWO AT THE SAME TIME. Q. AND SO THAT'S THE REASON AND IF IT IS THE REASON, YOU JUST TELL ME. BUT IS THAT THE REASON THAT YOU SAY THAT WHEN YOU HEAR THE TWO, THEY DON'T SOUND SIMILAR TO YOU AT ALL? A. YES, BECAUSE MUSICALLY, THERE IS NO SIMILARITY.	7 8 9 10 11 12 13 14 15 16 17 18	Q. OKAY. A SO! CAN'T EVEN REGISTER THAT SECTION. Q. DON'T KNOW WHAT IT WAS? A HAVE NO IDEA. Q. OKAY. ALL RIGHT. ALL RIGHT. I'M GOING TO PLAY THE NEXT SECTION. A YES, SIR. (WHEREUPON, AN AUDIO CLIP PLAYED.) THE DEPONENT: OH. OH. OH. (CONCLUSION OF AUDIO CLIP.)
9 10 11 12 13 14 15 16 17 18	WHAT YOU'RE PLAYING IS IS WHEN I SAY "MUSICAL IMPOSSIBILITY," YOU CAN'T PLAY ONE OVER THE OTHER AND AND IT EVER MAKE SENSE IN A BAND. THEY WOULD NEVER BE ABLE TO PLAY THE TWO AT THE SAME TIME. Q. AND SO THAT'S THE REASON AND IF IT IS THE REASON, YOU JUST TELL ME. BUT IS THAT THE REASON THAT YOU SAY THAT WHEN YOU HEAR THE TWO, THEY DON'T SOUND SIMILAR TO YOU AT ALL? A. YES, BECAUSE MUSICALLY, THERE IS NO SIMILARITY. Q. OKAY. AND YOU DON'T BELIEVE ANYONE	7 8 9 10 11 12 13 14 15 16 17 18	Q. OKAY. A SO! CAN'T EVEN REGISTER THAT SECTION. Q. DON'T KNOW WHAT IT WAS? A HAVE NO IDEA. Q. OKAY. ALL RIGHT. ALL RIGHT. I'M GOING TO PLAY THE NEXT SECTION. A YES, SIR. (WHEREUPON, AN AUDIO CLIP PLAYED.) THE DEPONENT: OH. OH. OH. OH. (CONCLUSION OF AUDIO CLIP.) BY MR. BUSCH:
9 10 11 12 13 14 15 16 17 18 19 20	WHAT YOU'RE PLAYING IS IS WHEN I SAY "MUSICAL IMPOSSIBILITY," YOU CAN'T PLAY ONE OVER THE OTHER AND AND IT EVER MAKE SENSE IN A BAND. THEY WOULD NEVER BE ABLE TO PLAY THE TWO AT THE SAME TIME. Q. AND SO THAT'S THE REASON AND IF IT IS THE REASON, YOU JUST TELL ME. BUT IS THAT THE REASON THAT YOU SAY THAT WHEN YOU HEAR THE TWO, THEY DON'T SOUND SIMILAR TO YOU AT ALL? A. YES, BECAUSE MUSICALLY, THERE IS NO SIMILARITY. Q. OKAY. AND YOU DON'T BELIEVE ANYONE COULD LISTEN TO THOSE TWO BASS LINES AND THINK	7 8 9 10 11 12 13 14 15 16 17 18 19 20	Q. OKAY. A SO! CAN'T EVEN REGISTER THAT SECTION. Q. DON'T KNOW WHAT IT WAS? A HAVE NO IDEA. Q. OKAY. ALL RIGHT. ALL RIGHT. I'M GOING TO PLAY THE NEXT SECTION. A YES, SIR. (WHEREUPON, AN AUDIO CLIP PLAYED.) THE DEPONENT: OH. OH. OH. OH. (CONCLUSION OF AUDIO CLIP.) BY MR. BUSCH: Q. IN THAT SECTION WITH MARVIN SINGING
9 10 11 12 13 14 15 16 17 18 19 20 21	WHAT YOU'RE PLAYING IS IS WHEN I SAY "MUSICAL IMPOSSIBILITY," YOU CAN'T PLAY ONE OVER THE OTHER AND AND IT EVER MAKE SENSE IN A BAND. THEY WOULD NEVER BE ABLE TO PLAY THE TWO AT THE SAME TIME. Q. AND SO THAT'S THE REASON AND IF IT IS THE REASON, YOU JUST TELL ME. BUT IS THAT THE REASON THAT YOU SAY THAT WHEN YOU HEAR THE TWO, THEY DON'T SOUND SIMILAR TO YOU AT ALL? A. YES, BECAUSE MUSICALLY, THERE IS NO SIMILARITY. Q. OKAY. AND YOU DON'T BELIEVE ANYONE COULD LISTEN TO THOSE TWO BASS LINES AND THINK THEY SOUND SIMILAR?	7 8 9 10 11 12 13 14 15 16 17 18 19 20 21	Q. OKAY. A SO! CAN'T EVEN REGISTER THAT SECTION. Q. DON'T KNOW WHAT IT WAS? A HAVE NO IDEA. Q. OKAY. ALL RIGHT. ALL RIGHT. I'M GOING TO PLAY THE NEXT SECTION. A YES, SIR. (WHEREUPON, AN AUDIO CLIP PLAYED.) THE DEPONENT: OH. OH. OH. OH. (CONCLUSION OF AUDIO CLIP.) BY MR. BUSCH: Q. IN THAT SECTION WITH MARVIN SINGING "KEEP ON DANCING"
9 10 11 12 13 14 15 16 17 18 19 20 21 22	WHAT YOU'RE PLAYING IS IS WHEN I SAY "MUSICAL IMPOSSIBILITY," YOU CAN'T PLAY ONE OVER THE OTHER AND AND IT EVER MAKE SENSE IN A BAND. THEY WOULD NEVER BE ABLE TO PLAY THE TWO AT THE SAME TIME. Q. AND SO THAT'S THE REASON AND IF IT IS THE REASON, YOU JUST TELL ME. BUT IS THAT THE REASON THAT YOU SAY THAT WHEN YOU HEAR THE TWO, THEY DON'T SOUND SIMILAR TO YOU AT ALL? A. YES, BECAUSE MUSICALLY, THERE IS NO SIMILARITY. Q. OKAY. AND YOU DON'T BELIEVE ANYONE COULD LISTEN TO THOSE TWO BASS LINES AND THINK THEY SOUND SIMILAR? MR. KING: OBJECT TO THE FORM;	7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22	Q. OKAY. A SO! CAN'T EVEN REGISTER THAT SECTION. Q. DON'T KNOW WHAT IT WAS? A HAVE NO IDEA. Q. OKAY. ALL RIGHT. ALL RIGHT. I'M GOING TO PLAY THE NEXT SECTION. A YES, SIR. (WHEREUPON, AN AUDIO CLIP PLAYED.) THE DEPONENT: OH. OH. OH. OH. (CONCLUSION OF AUDIO CLIP.) BY MR. BUSCH: Q. IN THAT SECTION WITH MARVIN SINGING "KEEP ON DANCING" A YES.
9 10 11 12 13 14 15 16 17 18 19 20 21 22 23	WHAT YOU'RE PLAYING IS IS WHEN I SAY "MUSICAL IMPOSSIBILITY," YOU CAN'T PLAY ONE OVER THE OTHER AND AND IT EVER MAKE SENSE IN A BAND. THEY WOULD NEVER BE ABLE TO PLAY THE TWO AT THE SAME TIME. Q. AND SO THAT'S THE REASON AND IF IT IS THE REASON, YOU JUST TELL ME. BUT IS THAT THE REASON THAT YOU SAY THAT WHEN YOU HEAR THE TWO, THEY DON'T SOUND SIMILAR TO YOU AT ALL? A. YES, BECAUSE MUSICALLY, THERE IS NO SIMILARITY. Q. OKAY. AND YOU DON'T BELIEVE ANYONE COULD LISTEN TO THOSE TWO BASS LINES AND THINK THEY SOUND SIMILAR? MR. KING: OBJECT TO THE FORM; CALLS FOR	7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23	Q. OKAY. A SO! CAN'T EVEN REGISTER THAT SECTION. Q. DON'T KNOW WHAT IT WAS? A HAVE NO IDEA. Q. OKAY. ALL RIGHT. ALL RIGHT. I'M GOING TO PLAY THE NEXT SECTION. A YES, SIR. (WHEREUPON, AN AUDIO CLIP PLAYED.) THE DEPONENT: OH. OH. OH. OH. (CONCLUSION OF AUDIO CLIP.) BY MR. BUSCH: Q. IN THAT SECTION WITH MARVIN SINGING "KEEP ON DANCING" A YES. Q WHICH BASS LINE WAS PLAYING?
9 10 11 12 13 14 15 16 17 18 19 20 21 22 23 24	WHAT YOU'RE PLAYING IS IS WHEN I SAY "MUSICAL IMPOSSIBILITY," YOU CAN'T PLAY ONE OVER THE OTHER AND AND IT EVER MAKE SENSE IN A BAND. THEY WOULD NEVER BE ABLE TO PLAY THE TWO AT THE SAME TIME. Q. AND SO THAT'S THE REASON AND IF IT IS THE REASON, YOU JUST TELL ME. BUT IS THAT THE REASON THAT YOU SAY THAT WHEN YOU HEAR THE TWO, THEY DON'T SOUND SIMILAR TO YOU AT ALL? A. YES, BECAUSE MUSICALLY, THERE IS NO SIMILARITY. Q. OKAY. AND YOU DON'T BELIEVE ANYONE COULD LISTEN TO THOSE TWO BASS LINES AND THINK THEY SOUND SIMILAR? MR. KING: OBJECT TO THE FORM; CALLS FOR THE DEPONENT: I CAN'T MR. KING: SPECULATION.	7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23 24	Q. OKAY. A SO! CAN'T EVEN REGISTER THAT SECTION. Q. DON'T KNOW WHAT IT WAS? A HAVE NO IDEA. Q. OKAY. ALL RIGHT. ALL RIGHT. I'M GOING TO PLAY THE NEXT SECTION. A YES, SIR. (WHEREUPON, AN AUDIO CLIP PLAYED.) THE DEPONENT: OH. OH. OH. OH. (CONCLUSION OF AUDIO CLIP.) BY MR. BUSCH: Q. IN THAT SECTION WITH MARVIN SINGING "KEEP ON DANCING" A YES. Q WHICH BASS LINE WAS PLAYING? A DEFINITELY "BLURRED LINES" BECAUSE
9 10 11 12 13 14 15 16 17 18 19 20 21 22 23 24	WHAT YOU'RE PLAYING IS IS WHEN I SAY "MUSICAL IMPOSSIBILITY," YOU CAN'T PLAY ONE OVER THE OTHER AND AND IT EVER MAKE SENSE IN A BAND. THEY WOULD NEVER BE ABLE TO PLAY THE TWO AT THE SAME TIME. Q. AND SO THAT'S THE REASON AND IF IT IS THE REASON, YOU JUST TELL ME. BUT IS THAT THE REASON THAT YOU SAY THAT WHEN YOU HEAR THE TWO, THEY DON'T SOUND SIMILAR TO YOU AT ALL? A. YES, BECAUSE MUSICALLY, THERE IS NO SIMILARITY. Q. OKAY. AND YOU DON'T BELIEVE ANYONE COULD LISTEN TO THOSE TWO BASS LINES AND THINK THEY SOUND SIMILAR? MR. KING: OBJECT TO THE FORM; CALLS FOR THE DEPONENT: I CAN'T	7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23 24	Q. OKAY. A SO! CAN'T EVEN REGISTER THAT SECTION. Q. DON'T KNOW WHAT IT WAS? A HAVE NO IDEA. Q. OKAY. ALL RIGHT. ALL RIGHT. I'M GOING TO PLAY THE NEXT SECTION. A YES, SIR. (WHEREUPON, AN AUDIO CLIP PLAYED.) THE DEPONENT: OH. OH. OH. OH. (CONCLUSION OF AUDIO CLIP.) BY MR. BUSCH: Q. IN THAT SECTION WITH MARVIN SINGING "KEEP ON DANCING" A YES. Q WHICH BASS LINE WAS PLAYING? A DEFINITELY "BLURRED LINES" BECAUSE



Kelli Norden and Associates Court Reporters 310.820.7733 phone 310.820.7933 fax 11835 W. Olympic Boulevard Suite 680E Los Angoles, California 90064 kna@kellinorden.com

Case 2:13-cv-06004-JAK-AGR Document 122 Filed 09/15/14 Page 70 of 125 Page ID #:2639

CONFIDENTIAL DEPOSITION OF ROBIN THICKE

			
1	Q OKAY, GREAT.	1	THE FORM, VAGUE AND AMBIGUOUS.
2	OKAY. I'M GOING TO KEEP ON KEEP	2	BY MR. BUSCH:
3	ON GOING.	3	Q. GO AHEAD.
4	A. YES, SIR.	4	A. YES, MY MY ANSWER WOULD BE
5	Q. KEEP ON DANCING.	5	BECAUSE OF THE THE THE AMOUNT OF DIFFERENT
6	A. YOU GOT IT, BABY.	6	VOCALS AND MAJOR/MINOR CHORDS THAT YOU HAVE, THAT
7	Q. ALL RIGHT.	7	·
8	A. THANKS FOR BEING COOL, TOO. I'M	8	BASS LINE IS UNRECOGNIZABLE TO ME, SO I COULDN'T
9	•		SAY THAT I'VE HEARD IT IN EITHER SONG.
:l	SORRY I CALLED YOU A DICK EARLIER. I KNOW YOU'RE	9	Q. OKAY.
10	JUST DOING YOUR JOB. I FEEL BAD ABOUT THAT.	10	A. AND THAT'S THE SAME AS THE OTHER
11	Q. THAT'S THE NICEST THING ANYONE'S	11	SECTION YOU PLAYED EARLIER WHEN I SAID IT WAS
12	SAID TO ME ALL DAY.	12	UNRECOGNIZABLE.
13	A. IT'S A TOUGH JOB, YOU KNOW.	13	Q. OKAY.
14	(WHEREUPON, AN AUDIO CLIP PLAYED.)	14	A. THAT HAD THE SAME EFFECT.
15	THE DEPONENT: OH, THE CHORDS.	15	Q. ALL RIGHT. AND THAT'S BOTH YOUR
16	OH. MM.	16	VOCALS AND MARVIN'S VOCALS
17	(CONCLUSION OF AUDIO CLIP.)	17	A. EXACTLY.
18	BY MR. BUSCH:	18	Q PLAYING SIMULTANEOUSLY; CORRECT?
19	Q SAME QUESTION	19	A. YES, IT IS. IF I REMEMBER
20	A. YEP.	20	CORRECTLY, AT THE END, BOTH VOCALS WERE PLAYING.
21	Q WHICH IS: WHICH BASS LINE DID	21	Q. OKAY, ALL RIGHT, JUST GIVE ME ONE
22	YOU HEAR IN THAT LAST SECTION?	22	MINUTE, PLEASE.
23	A. THAT LAST SECTION WAS "GOT TO GIVE	23	A. NO PROBLEM.
24	IT UP."	24	Q. YEAH. WE NEED TO TAKE A MINUTE
25	Q. AND IT WAS OVER WHOSE VOCALS?	25	NOW WE'VE COMPLETED THIS.
	50		52
1	A. BOTH VOCALS.	1	A. YES.
2	Q. OKAY, ALL RIGHT, I'M GOING TO	2	
3	PLAY THE NEXT SECTION.	-	Q. TAKE A FIVE-MINUTE BREAK, PLEASE.
1		3	A. OKAY. GREAT.
4	A. OKAY.	4	THE VIDEOGRAPHER: GOING OFF THE
5	(WHEREUPON, AN AUDIO CLIP PLAYED.)	5	VIDEOTAPE RECORD AT 12:14 P.M. THAT WILL CONCLUDE
6	THE DEPONENT: OH. OH.	6	DISK ONE OF VOLUME NUMBER I.
7	(CONCLUSION OF AUDIO CLIP.)	7	AND THAT'S OFF.
8	BY MR. BUSCH:	8	(WHEREUPON, A RECESS WAS HELD
9	Q. OKAY, SAME QUESTION WITH RESPECT	9	FROM 12:14 P.M. TO 12:26 P.M.)
10	TO THAT LAST SECTION YOU JUST HEARD: WHICH BASS	10	(WHEREUPON, THE PROCEEDINGS CONTINUED
11	LINE DID YOU HEAR?	11	WITHOUT THE PRESENCE OF MR. ROBERTS.)
12	A. THAT IS A FALSIFIED, MADE-UP BASS	12	THE VIDEOGRAPHER: AND WE'RE BACK
13	LINE BY YOU AND YOUR PEOPLE. THERE IS NO	13	ON THE VIDEOTAPE RECORD, BEGINNING DISK NUMBER TWO
14	EIGHT-BAR STANZA THAT HAS THAT BASS LINE THAT	14	OF VOLUME NUMBER 1 AT 12:26 P.M.
15	REPETITIVE. YOU YOUR PEOPLE MUST HAVE CREATED	15	BY MR. BUSCH:
16	THAT. THAT DOESN'T EXIST IN EITHER SONG.	16	Q. MR. THICKE, WE KIND OF JUMPED AHEAD
17	Q. THAT DOESN'T EXIST IN EITHER SONG?	17	A LITTLE BIT BY PLAYING THIS MUSIC RIGHT AT THE
18	A. AS FAR AS I KNOW	18	BEGINNING,
19	Q. AND	19	A. UH-HUH.
20	A THOSE LAST EIGHT BARS OF BASS	20	Q. I WANT TO GO BACK NOW AND KIND OF
21	LINE HAVE BEEN CREATED BY SOMEONE ON YOUR TEAM.	21	GET SOME BACKGROUND ABOUT YOU, IF I COULD.
22	Q. OKAY, AND SO IT IS NOT IN ANY WAY	22	A. YES, SIR.
			·
23	WHAT CAN BE HEARD IN EITHER "GOT TO GIVE IT UP" OR	23	Q. WHAT YEAR DID YOU GRADUATE HIGH
20.4	"BLURRED LINES"?	24	SCHOOL?
24	MD KING, ODJECTICAL ODJECT TO		* 1000)4110 0011102 :
24 25	MR. KING: OBJECTION. OBJECT TO	25	A. I GREW UP OOH, '95. '95.
l	MR. KING: OBJECTION, OBJECT TO 51	25	а. I grew up оон, '95, '95. 53



Kelli Norden and Associates Court Reporters 310.820.7733 phone 310.820.7933 fax 11835 W. Olympic Boulevard Suite 680t Los Angeles, California 3006+ kna8kellinorden.com

		7	
1	I CAN ONLY DECIPHER THAT IF I HAD A	١,	O LET ME
2	KEYBOARD; I COULD TELL YOU WHICH NOTE MADE THE	1 2	Q. LET ME
3	DIFFERENCE.	3	MR. KING: YOU
4	Q. SO YOU WOULD NOT BE ABLE TO	1	BY MR. BUSCH:
5	TO SITTING HERE TODAY, LOOKING AT THIS, YOU	4	Q. WHAT I DID WAS
6	·	5	A. OKAY, I'M SORRY,
7	WOULD NOT BE ABLE TO EITHER CONFIRM OR DENY THAT	6	Q I SERVED WRITTEN QUESTIONS.
	IS THE THE C SHARP THAT IS THE THIRD THAT WOULD	7	A. OKAY.
8	BE, IN YOUR VIEW, THE MOST CRUCIAL?	8	Q. I IN A LAWSUIT LIKE THIS, IN
9	A. NO. IN FACT, I WOULD ABSOLUTELY	9	ADDITION TO DOING A DEPOSITION WHERE I QUESTION
10	NOT STATE THAT BECAUSE UNLESS I HAVE A KEYBOARD	10	YOU
11	AND I COULD PLAY THE CHORD MYSELF BY EAR, I	11	A. RIGHT.
12	WOULDN'T BE ABLE TO TELL YOU WHAT WAS THE NOTE	12	Q WE'RE ALSO ENTITLED TO SERVE
13	THAT MADE THE DIFFERENCE BETWEEN THE MAJOR AND	13	WRITTEN QUESTIONS
14	MINOR.	14	A. GOT IT.
15	Q. OKAY.	15	Q THAT YOU ARE TO ANSWER.
16	A. BUT I CAN DO IT BY EAR.	16	A. GOT IT.
17	Q. DO YOU MEAN THAT MARVIN GAYE'S "GOT	17	Q. SO I'M IF YOU TURN TO
18	TO GIVE IT UP" IS IN A MINOR KEY OR JUST THE	18	A. THIS DOES LOOK LIKE THE PIECE OF
19	KEY OR JUST THAT THE KEYBOARD CHORD IS IN A	19	PAPER THAT I SIGNED THAT HAD MY ANSWERS IN THEM.
20	MINOR KEY?	20	Q. OKAY. SO YOU DID READ AND CONFIRM
21	A. THEY THEY ONE CAN'T EXIST	21	THE ANSWERS THAT ARE IN THIS AS BEING TRUE AND
22	WITHOUT THE OTHER.	22	ACCURATE, TO THE BEST OF YOUR KNOWLEDGE?
23	Q. MEANING THEY'RE BOTH IN THE MINOR	23	A. YES, IF THIS IS I HAVEN'T SEEN
24	KEY?	24	ANYTHING WITH MY NAME IN IT YET OR SAYS OR HAVE
25	A. YES. "DOO, DOO, DOO, DOO." THE	25	ANY OF MY QUOTES IN IT. BUT IF THIS IS THAT PIECE
. Not followed on more owners as	<u>66</u>		68
il .		1	
п	PASS LINE IS MINIOD POOR DOOR DOOR DOOR	_	OF BARED THE WEST LINE AND AND IN
1	BASS LINE IS MINOR. "DOO, DOO, DOO, DOO, DOO,	1	OF PAPER, THEN YES, I DID APPROVE IT.
2	DOO."	2	MR. KING: THIS IS NOT, SO
2 3	DOO." Q. ALL RIGHT.	2 3	MR. KING: THIS IS NOT, SO THE DEPONENT: IT'S NOT?
2 . 3 4	Q. ALL RIGHT. ALL RIGHT. I WANT TO NOW GIVE YOU	2 3 4	MR. KING: THIS IS NOT, SO THE DEPONENT: IT'S NOT? MR. KING: NO.
2 3 4 5	Q. ALL RIGHT. ALL RIGHT. I WANT TO NOW GIVE YOU A COUPLE OF THINGS TO AUTHENTICATE FOR ME.	2 3 4 5	MR. KING: THIS IS NOT, SO THE DEPONENT: IT'S NOT? MR. KING: NO. WHY DON'T YOU GIVE HIM THE ONE HE
2 3 4 5 6	DOO." Q. ALL RIGHT. ALL RIGHT. I WANT TO NOW GIVE YOU A COUPLE OF THINGS TO AUTHENTICATE FOR ME. A. OKAY.	2 3 4 5 6	MR. KING: THIS IS NOT, SO THE DEPONENT: IT'S NOT? MR. KING: NO. WHY DON'T YOU GIVE HIM THE ONE HE SIGNED, RICHARD. REALLY.
2 3 4 5 6 7	DOO." Q. ALL RIGHT. ALL RIGHT. I WANT TO NOW GIVE YOU A COUPLE OF THINGS TO AUTHENTICATE FOR ME. A. OKAY. MR. BUSCH: LET'S MARK AS THE NEXT	2 3 4 5 6 7	MR. KING: THIS IS NOT, SO THE DEPONENT: IT'S NOT? MR. KING: NO. WHY DON'T YOU GIVE HIM THE ONE HE SIGNED, RICHARD. REALLY. THE DEPONENT: YEAH, BE CAUSE IT
2 3 4 5 6 7 8	DOO." Q. ALL RIGHT. ALL RIGHT. I WANT TO NOW GIVE YOU A COUPLE OF THINGS TO AUTHENTICATE FOR ME. A. OKAY. MR. BUSCH: LET'S MARK AS THE NEXT EXHIBIT MR. THICKE'S RESPONSES TO INTERROGATORIES.	2 3 4 5 6 7 8	MR. KING: THIS IS NOT, SO THE DEPONENT: IT'S NOT? MR. KING: NO. WHY DON'T YOU GIVE HIM THE ONE HE SIGNED, RICHARD. REALLY. THE DEPONENT: YEAH, BE CAUSE IT DOESN'T LOOK EXACTLY THE SAME.
2 3 4 5 6 7 8	DOO." Q. ALL RIGHT. ALL RIGHT. I WANT TO NOW GIVE YOU A COUPLE OF THINGS TO AUTHENTICATE FOR ME. A. OKAY. MR. BUSCH: LET'S MARK AS THE NEXT EXHIBIT MR. THICKE'S RESPONSES TO INTERROGATORIES, DEPOSITION OFFICER: EXHIBIT 32.	2 3 4 5 6 7 8 9	MR. KING: THIS IS NOT, SO THE DEPONENT: IT'S NOT? MR. KING: NO. WHY DON'T YOU GIVE HIM THE ONE HE SIGNED, RICHARD. REALLY. THE DEPONENT: YEAH, BE CAUSE IT DOESN'T LOOK EXACTLY THE SAME. MR. KING: WE'LL STIPULATE THAT HE
2 3 4 5 6 7 8 9	DOO." Q. ALL RIGHT. ALL RIGHT. I WANT TO NOW GIVE YOU A COUPLE OF THINGS TO AUTHENTICATE FOR ME. A. OKAY. MR. BUSCH: LET'S MARK AS THE NEXT EXHIBIT MR. THICKE'S RESPONSES TO INTERROGATORIES. DEPOSITION OFFICER: EXHIBIT 32. (WHEREUPON, DEFENDANTS' EXHIBIT NUMBER	2 3 4 5 6 7 8 9	MR. KING: THIS IS NOT, SO THE DEPONENT: IT'S NOT? MR. KING: NO. WHY DON'T YOU GIVE HIM THE ONE HE SIGNED, RICHARD. REALLY. THE DEPONENT: YEAH, BE CAUSE IT DOESN'T LOOK EXACTLY THE SAME. MR. KING: WE'LL STIPULATE THAT HE SIGNED AND VERIFIED RESPONSES TO INTERROGATORIES,
2 3 4 5 6 7 8 9	DOO." Q. ALL RIGHT. ALL RIGHT. I WANT TO NOW GIVE YOU A COUPLE OF THINGS TO AUTHENTICATE FOR ME. A. OKAY. MR. BUSCH: LET'S MARK AS THE NEXT EXHIBIT MR. THICKE'S RESPONSES TO INTERROGATORIES. DEPOSITION OFFICER: EXHIBIT 32. (WHEREUPON, DEFENDANTS' EXHIBIT NUMBER 32 WAS MARKED FOR IDENTIFICATION BY	2 3 4 5 6 7 8 9 10	MR. KING: THIS IS NOT, SO THE DEPONENT: IT'S NOT? MR. KING: NO. WHY DON'T YOU GIVE HIM THE ONE HE SIGNED, RICHARD. REALLY. THE DEPONENT: YEAH, BE CAUSE IT DOESN'T LOOK EXACTLY THE SAME. MR. KING: WE'LL STIPULATE THAT HE SIGNED AND VERIFIED RESPONSES TO INTERROGATORIES, IF THAT'S WHAT YOU WANT.
2 3 4 5 6 7 8 9 10 11	Q. ALL RIGHT. ALL RIGHT. I WANT TO NOW GIVE YOU A COUPLE OF THINGS TO AUTHENTICATE FOR ME. A. OKAY. MR. BUSCH: LET'S MARK AS THE NEXT EXHIBIT MR. THICKE'S RESPONSES TO INTERROGATORIES. DEPOSITION OFFICER: EXHIBIT 32. (WHEREUPON, DEFENDANTS' EXHIBIT NUMBER 32 WAS MARKED FOR IDENTIFICATION BY THE DEPOSITION OFFICER AND IS ATTACHED	2 3 4 5 6 7 8 9 10 11	MR. KING: THIS IS NOT, SO THE DEPONENT: IT'S NOT? MR. KING: NO. WHY DON'T YOU GIVE HIM THE ONE HE SIGNED, RICHARD. REALLY. THE DEPONENT: YEAH, BE CAUSE IT DOESN'T LOOK EXACTLY THE SAME. MR. KING: WE'LL STIPULATE THAT HE SIGNED AND VERIFIED RESPONSES TO INTERROGATORIES, IF THAT'S WHAT YOU WANT. MR. BUSCH: YES, I DO.
2 3 4 5 6 7 8 9 10 11 12 13	Q. ALL RIGHT. ALL RIGHT. I WANT TO NOW GIVE YOU A COUPLE OF THINGS TO AUTHENTICATE FOR ME. A. OKAY. MR. BUSCH: LET'S MARK AS THE NEXT EXHIBIT MR. THICKE'S RESPONSES TO INTERROGATORIES. DEPOSITION OFFICER: EXHIBIT 32. (WHEREUPON, DEFENDANTS' EXHIBIT NUMBER 32 WAS MARKED FOR IDENTIFICATION BY THE DEPOSITION OFFICER AND IS ATTACHED HERETO.)	2 3 4 5 6 7 8 9 10 11 12 13	MR. KING: THIS IS NOT, SO THE DEPONENT: IT'S NOT? MR. KING: NO. WHY DON'T YOU GIVE HIM THE ONE HE SIGNED, RICHARD. REALLY. THE DEPONENT: YEAH, BE CAUSE IT DOESN'T LOOK EXACTLY THE SAME. MR. KING: WE'LL STIPULATE THAT HE SIGNED AND VERIFIED RESPONSES TO INTERROGATORIES, IF THAT'S WHAT YOU WANT. MR. BUSCH: YES, I DO. MR. KING: WELL, WE'LL STIPULATE TO
2 3 4 5 6 7 8 9 10 11 12 13	Q. ALL RIGHT. ALL RIGHT. I WANT TO NOW GIVE YOU A COUPLE OF THINGS TO AUTHENTICATE FOR ME. A. OKAY. MR. BUSCH: LET'S MARK AS THE NEXT EXHIBIT MR. THICKE'S RESPONSES TO INTERROGATORIES. DEPOSITION OFFICER: EXHIBIT 32. (WHEREUPON, DEFENDANTS' EXHIBIT NUMBER 32 WAS MARKED FOR IDENTIFICATION BY THE DEPOSITION OFFICER AND IS ATTACHED HERETO.) DEPOSITION OFFICER: THERE YOU GO.	2 3 4 5 6 7 8 9 10 11 12 13	MR. KING: THIS IS NOT, SO THE DEPONENT: IT'S NOT? MR. KING: NO. WHY DON'T YOU GIVE HIM THE ONE HE SIGNED, RICHARD. REALLY. THE DEPONENT: YEAH, BE CAUSE IT DOESN'T LOOK EXACTLY THE SAME. MR. KING: WE'LL STIPULATE THAT HE SIGNED AND VERIFIED RESPONSES TO INTERROGATORIES, IF THAT'S WHAT YOU WANT. MR. BUSCH: YES, I DO. MR. KING: WELL, WE'LL, STIPULATE TO THAT.
2 3 4 5 6 7 8 9 10 11 12 13 14 15	Q. ALL RIGHT. ALL RIGHT. I WANT TO NOW GIVE YOU A COUPLE OF THINGS TO AUTHENTICATE FOR ME. A. OKAY. MR. BUSCH: LET'S MARK AS THE NEXT EXHIBIT MR. THICKE'S RESPONSES TO INTERROGATORIES. DEPOSITION OFFICER: EXHIBIT 32. (WHEREUPON, DEFENDANTS' EXHIBIT NUMBER 32 WAS MARKED FOR IDENTIFICATION BY THE DEPOSITION OFFICER AND IS ATTACHED HERETO.) DEPOSITION OFFICER: THERE YOU GO. THE DEPONENT: THANK YOU, LOVE.	2 3 4 5 6 7 8 9 10 11 12 13 14 15	MR. KING: THIS IS NOT, SO THE DEPONENT: IT'S NOT? MR. KING: NO. WHY DON'T YOU GIVE HIM THE ONE HE SIGNED, RICHARD. REALLY. THE DEPONENT: YEAH, BE CAUSE IT DOESN'T LOOK EXACTLY THE SAME. MR. KING: WE'LL STIPULATE THAT HE SIGNED AND VERIFIED RESPONSES TO INTERROGATORIES, IF THAT'S WHAT YOU WANT. MR. BUSCH: YES, I DO. MR. KING: WELL, WE'LL STIPULATE TO THAT. MR. BUSCH: OKAY.
2 3 4 5 6 7 8 9 10 11 12 13 14 15	Q. ALL RIGHT. ALL RIGHT. I WANT TO NOW GIVE YOU A COUPLE OF THINGS TO AUTHENTICATE FOR ME. A. OKAY. MR. BUSCH: LET'S MARK AS THE NEXT EXHIBIT MR. THICKE'S RESPONSES TO INTERROGATORIES. DEPOSITION OFFICER: EXHIBIT 32. (WHEREUPON, DEFENDANTS' EXHIBIT NUMBER 32 WAS MARKED FOR IDENTIFICATION BY THE DEPOSITION OFFICER AND IS ATTACHED HERETO.) DEPOSITION OFFICER: THERE YOU GO. THE DEPONENT: THANK YOU, LOVE. WHICH PAGE WOULD YOU LIKE ME TO GO	2 3 4 5 6 7 8 9 10 11 12 13 14 15	MR. KING: THIS IS NOT, SO THE DEPONENT: IT'S NOT? MR. KING: NO. WHY DON'T YOU GIVE HIM THE ONE HE SIGNED, RICHARD. REALLY. THE DEPONENT: YEAH, BE CAUSE IT DOESN'T LOOK EXACTLY THE SAME. MR. KING: WE'LL STIPULATE THAT HE SIGNED AND VERIFIED RESPONSES TO INTERROGATORIES, IF THAT'S WHAT YOU WANT. MR. BUSCH: YES, I DO. MR. KING: WELL, WE'LL STIPULATE TO THAT. MR. BUSCH: OKAY. MR. KING: JUST DOESN'T HAPPEN TO
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17	Q. ALL RIGHT. ALL RIGHT. I WANT TO NOW GIVE YOU A COUPLE OF THINGS TO AUTHENTICATE FOR ME. A. OKAY. MR. BUSCH: LET'S MARK AS THE NEXT EXHIBIT MR. THICKE'S RESPONSES TO INTERROGATORIES. DEPOSITION OFFICER: EXHIBIT 32. (WHEREUPON, DEFENDANTS' EXHIBIT NUMBER 32 WAS MARKED FOR IDENTIFICATION BY THE DEPOSITION OFFICER AND IS ATTACHED HERETO.) DEPOSITION OFFICER: THERE YOU GO. THE DEPONENT: THANK YOU, LOVE. WHICH PAGE WOULD YOU LIKE ME TO GO TO?	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17	MR. KING: THIS IS NOT, SO THE DEPONENT: IT'S NOT? MR. KING: NO. WHY DON'T YOU GIVE HIM THE ONE HE SIGNED, RICHARD. REALLY. THE DEPONENT: YEAH, BE CAUSE IT DOESN'T LOOK EXACTLY THE SAME. MR. KING: WE'LL STIPULATE THAT HE SIGNED AND VERIFIED RESPONSES TO INTERROGATORIES, IF THAT'S WHAT YOU WANT. MR. BUSCH: YES, I DO. MR. KING: WE'LL, STIPULATE TO THAT. MR. BUSCH: OKAY. MR. KING: JUST DOESN'T HAPPEN TO BE EXHIBIT 32. PROBABLY EXHIBIT 33. IF YOU FLASH
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18	Q. ALL RIGHT. ALL RIGHT. I WANT TO NOW GIVE YOU A COUPLE OF THINGS TO AUTHENTICATE FOR ME. A. OKAY. MR. BUSCH: LET'S MARK AS THE NEXT EXHIBIT MR. THICKE'S RESPONSES TO INTERROGATORIES. DEPOSITION OFFICER: EXHIBIT 32. (WHEREUPON, DEFENDANTS' EXHIBIT NUMBER 32 WAS MARKED FOR IDENTIFICATION BY THE DEPOSITION OFFICER AND IS ATTACHED HERETO.) DEPOSITION OFFICER: THERE YOU GO. THE DEPONENT: THANK YOU, LOVE. WHICH PAGE WOULD YOU LIKE ME TO GO TO? BY MR. BUSCH:	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18	MR. KING: THIS IS NOT, SO THE DEPONENT: IT'S NOT? MR. KING: NO. WHY DON'T YOU GIVE HIM THE ONE HE SIGNED, RICHARD. REALLY. THE DEPONENT: YEAH, BE CAUSE IT DOESN'T LOOK EXACTLY THE SAME. MR. KING: WE'LL STIPULATE THAT HE SIGNED AND VERIFIED RESPONSES TO INTERROGATORIES, IF THAT'S WHAT YOU WANT. MR. BUSCH: YES, I DO. MR. KING: WELL, WE'LL STIPULATE TO THAT. MR. BUSCH: OKAY. MR. KING: JUST DOESN'T HAPPEN TO BE EXHIBIT 32. PROBABLY EXHIBIT 33. IF YOU FLASH ME THE VERIFICATION, I'LL STIPULATE THAT THAT'S
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18	Q. ALL RIGHT. ALL RIGHT. I WANT TO NOW GIVE YOU A COUPLE OF THINGS TO AUTHENTICATE FOR ME. A. OKAY. MR. BUSCH: LET'S MARK AS THE NEXT EXHIBIT MR. THICKE'S RESPONSES TO INTERROGATORIES. DEPOSITION OFFICER: EXHIBIT 32. (WHEREUPON, DEFENDANTS' EXHIBIT NUMBER 32 WAS MARKED FOR IDENTIFICATION BY THE DEPOSITION OFFICER AND IS ATTACHED HERETO.) DEPOSITION OFFICER: THERE YOU GO. THE DEPONENT: THANK YOU, LOVE. WHICH PAGE WOULD YOU LIKE ME TO GO TO? BY MR. BUSCH: Q. FIRST OF ALL, I WANT TO ASK YOU:	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17	MR. KING: THIS IS NOT, SO THE DEPONENT: IT'S NOT? MR. KING: NO. WHY DON'T YOU GIVE HIM THE ONE HE SIGNED, RICHARD. REALLY. THE DEPONENT: YEAH, BE CAUSE IT DOESN'T LOOK EXACTLY THE SAME. MR. KING: WE'LL STIPULATE THAT HE SIGNED AND VERIFIED RESPONSES TO INTERROGATORIES, IF THAT'S WHAT YOU WANT. MR. BUSCH: YES, I DO. MR. KING: WE'LL, STIPULATE TO THAT. MR. BUSCH: OKAY. MR. KING: JUST DOESN'T HAPPEN TO BE EXHIBIT 32. PROBABLY EXHIBIT 33. IF YOU FLASH
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20	Q. ALL RIGHT. ALL RIGHT. I WANT TO NOW GIVE YOU A COUPLE OF THINGS TO AUTHENTICATE FOR ME. A. OKAY. MR. BUSCH: LET'S MARK AS THE NEXT EXHIBIT MR. THICKE'S RESPONSES TO INTERROGATORIES. DEPOSITION OFFICER: EXHIBIT 32. (WHEREUPON, DEFENDANTS' EXHIBIT NUMBER 32 WAS MARKED FOR IDENTIFICATION BY THE DEPOSITION OFFICER AND IS ATTACHED HERETO.) DEPOSITION OFFICER: THERE YOU GO. THE DEPONENT: THANK YOU, LOVE. WHICH PAGE WOULD YOU LIKE ME TO GO TO? BY MR. BUSCH: Q. FIRST OF ALL, I WANT TO ASK YOU: HAVE YOU EVER SEEN THIS DOCUMENT BEFORE IN YOUR	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18	MR. KING: THIS IS NOT, SO THE DEPONENT: IT'S NOT? MR. KING: NO. WHY DON'T YOU GIVE HIM THE ONE HE SIGNED, RICHARD. REALLY. THE DEPONENT: YEAH, BE CAUSE IT DOESN'T LOOK EXACTLY THE SAME. MR. KING: WE'LL STIPULATE THAT HE SIGNED AND VERIFIED RESPONSES TO INTERROGATORIES, IF THAT'S WHAT YOU WANT. MR. BUSCH: YES, I DO. MR. KING: WELL, WE'LL STIPULATE TO THAT. MR. BUSCH: OKAY. MR. KING: JUST DOESN'T HAPPEN TO BE EXHIBIT 32. PROBABLY EXHIBIT 33. IF YOU FLASH ME THE VERIFICATION, I'LL STIPULATE THAT THAT'S
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21	Q. ALL RIGHT. ALL RIGHT. I WANT TO NOW GIVE YOU A COUPLE OF THINGS TO AUTHENTICATE FOR ME. A. OKAY. MR. BUSCH: LET'S MARK AS THE NEXT EXHIBIT MR. THICKE'S RESPONSES TO INTERROGATORIES. DEPOSITION OFFICER: EXHIBIT 32. (WHEREUPON, DEFENDANTS' EXHIBIT NUMBER 32 WAS MARKED FOR IDENTIFICATION BY THE DEPOSITION OFFICER AND IS ATTACHED HERETO.) DEPOSITION OFFICER: THERE YOU GO. THE DEPONENT: THANK YOU, LOVE. WHICH PAGE WOULD YOU LIKE ME TO GO TO? BY MR. BUSCH: Q. FIRST OF ALL, I WANT TO ASK YOU: HAVE YOU EVER SEEN THIS DOCUMENT BEFORE IN YOUR LIFE?	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19	MR. KING: THIS IS NOT, SO THE DEPONENT: IT'S NOT? MR. KING: NO. WHY DON'T YOU GIVE HIM THE ONE HE SIGNED, RICHARD. REALLY. THE DEPONENT: YEAH, BE CAUSE IT DOESN'T LOOK EXACTLY THE SAME. MR. KING: WE'LL STIPULATE THAT HE SIGNED AND VERIFIED RESPONSES TO INTERROGATORIES, IF THAT'S WHAT YOU WANT. MR. BUSCH: YES, I DO. MR. KING: WELL, WE'LL STIPULATE TO THAT. MR. BUSCH: OKAY. MR. KING: JUST DOESN'T HAPPEN TO BE EXHIBIT 32. PROBABLY EXHIBIT 33. IF YOU FLASH ME THE VERIFICATION, I'LL STIPULATE THAT THAT'S WHAT HE SIGNED AND SERVED.
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20	Q. ALL RIGHT. ALL RIGHT. I WANT TO NOW GIVE YOU A COUPLE OF THINGS TO AUTHENTICATE FOR ME. A. OKAY. MR. BUSCH: LET'S MARK AS THE NEXT EXHIBIT MR. THICKE'S RESPONSES TO INTERROGATORIES. DEPOSITION OFFICER: EXHIBIT 32. (WHEREUPON, DEFENDANTS' EXHIBIT NUMBER 32 WAS MARKED FOR IDENTIFICATION BY THE DEPOSITION OFFICER AND IS ATTACHED HERETO.) DEPOSITION OFFICER: THERE YOU GO. THE DEPONENT: THANK YOU, LOVE. WHICH PAGE WOULD YOU LIKE ME TO GO TO? BY MR. BUSCH: Q. FIRST OF ALL, I WANT TO ASK YOU: HAVE YOU EVER SEEN THIS DOCUMENT BEFORE IN YOUR LIFE? A. I BELIEVE THIS IS THE DOCUMENT THAT	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20	MR. KING: THIS IS NOT, SO THE DEPONENT: IT'S NOT? MR. KING: NO. WHY DON'T YOU GIVE HIM THE ONE HE SIGNED, RICHARD. REALLY. THE DEPONENT: YEAH, BE CAUSE IT DOESN'T LOOK EXACTLY THE SAME. MR. KING: WE'LL STIPULATE THAT HE SIGNED AND VERIFIED RESPONSES TO INTERROGATORIES, IF THAT'S WHAT YOU WANT. MR. BUSCH: YES, I DO. MR. KING: WELL, WE'LL STIPULATE TO THAT. MR. BUSCH: OKAY. MR. KING: JUST DOESN'T HAPPEN TO BE EXHIBIT 32. PROBABLY EXHIBIT 33. IF YOU FLASH ME THE VERIFICATION, I'LL STIPULATE THAT THAT'S WHAT HE SIGNED AND SERVED. MR. BUSCH: I GOT IT. OKAY.
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21	Q. ALL RIGHT. ALL RIGHT. I WANT TO NOW GIVE YOU A COUPLE OF THINGS TO AUTHENTICATE FOR ME. A. OKAY. MR. BUSCH: LET'S MARK AS THE NEXT EXHIBIT MR. THICKE'S RESPONSES TO INTERROGATORIES. DEPOSITION OFFICER: EXHIBIT 32. (WHEREUPON, DEFENDANTS' EXHIBIT NUMBER 32 WAS MARKED FOR IDENTIFICATION BY THE DEPOSITION OFFICER AND IS ATTACHED HERETO.) DEPOSITION OFFICER: THERE YOU GO. THE DEPONENT: THANK YOU, LOVE. WHICH PAGE WOULD YOU LIKE ME TO GO TO? BY MR. BUSCH: Q. FIRST OF ALL, I WANT TO ASK YOU: HAVE YOU EVER SEEN THIS DOCUMENT BEFORE IN YOUR LIFE?	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21	MR. KING: THIS IS NOT, SO THE DEPONENT: IT'S NOT? MR. KING: NO. WHY DON'T YOU GIVE HIM THE ONE HE SIGNED, RICHARD. REALLY. THE DEPONENT: YEAH, BE CAUSE IT DOESN'T LOOK EXACTLY THE SAME. MR. KING: WE'LL STIPULATE THAT HE SIGNED AND VERIFIED RESPONSES TO INTERROGATORIES, IF THAT'S WHAT YOU WANT. MR. BUSCH: YES, I DO. MR. KING: WELL, WE'LL STIPULATE TO THAT. MR. BUSCH: OKAY. MR. KING: JUST DOESN'T HAPPEN TO BE EXHIBIT 32. PROBABLY EXHIBIT 33. IF YOU FLASH ME THE VERIFICATION, I'LL STIPULATE THAT THAT'S WHAT HE SIGNED AND SERVED. MR. BUSCH: I GOT IT. OKAY. WASN'T MEANT TO BE A TRICK. I JUST PULLED OUT THE
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22	Q. ALL RIGHT. ALL RIGHT. I WANT TO NOW GIVE YOU A COUPLE OF THINGS TO AUTHENTICATE FOR ME. A. OKAY. MR. BUSCH: LET'S MARK AS THE NEXT EXHIBIT MR. THICKE'S RESPONSES TO INTERROGATORIES. DEPOSITION OFFICER: EXHIBIT 32. (WHEREUPON, DEFENDANTS' EXHIBIT NUMBER 32 WAS MARKED FOR IDENTIFICATION BY THE DEPOSITION OFFICER AND IS ATTACHED HERETO.) DEPOSITION OFFICER: THERE YOU GO. THE DEPONENT: THANK YOU, LOVE. WHICH PAGE WOULD YOU LIKE ME TO GO TO? BY MR. BUSCH: Q. FIRST OF ALL, I WANT TO ASK YOU: HAVE YOU EVER SEEN THIS DOCUMENT BEFORE IN YOUR LIFE? A. I BELIEVE THIS IS THE DOCUMENT THAT	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22	MR. KING: THIS IS NOT, SO THE DEPONENT: IT'S NOT? MR. KING: NO. WHY DON'T YOU GIVE HIM THE ONE HE SIGNED, RICHARD. REALLLY. THE DEPONENT: YEAH, BE CAUSE IT DOESN'T LOOK EXACTLY THE SAME. MR. KING: WE'LL STIPULATE THAT HE SIGNED AND VERIFIED RESPONSES TO INTERROGATORIES, IF THAT'S WHAT YOU WANT. MR. BUSCH: YES, I DO. MR. KING: WELL, WE'LL STIPULATE TO THAT. MR. BUSCH: OKAY. MR. KING: JUST DOESN'T HAPPEN TO BE EXHIBIT 32. PROBABLY EXHIBIT 33. IF YOU FLASH ME THE VERIFICATION, I'LL STIPULATE THAT THAT'S WHAT HE SIGNED AND SERVED. MR. BUSCH: I GOT IT. OKAY. WASN'T MEANT TO BE A TRICK. I JUST PULLED OUT THE WRONG ONE.
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23	Q. ALL RIGHT. ALL RIGHT. I WANT TO NOW GIVE YOU A COUPLE OF THINGS TO AUTHENTICATE FOR ME. A. OKAY. MR. BUSCH: LET'S MARK AS THE NEXT EXHIBIT MR. THICKE'S RESPONSES TO INTERROGATORIES. DEPOSITION OFFICER: EXHIBIT 32. (WHEREUPON, DEFENDANTS' EXHIBIT NUMBER 32 WAS MARKED FOR IDENTIFICATION BY THE DEPOSITION OFFICER AND IS ATTACHED HERETO.) DEPOSITION OFFICER: THERE YOU GO. THE DEPONENT: THANK YOU, LOVE. WHICH PAGE WOULD YOU LIKE ME TO GO TO? BY MR. BUSCH: Q. FIRST OF ALL, I WANT TO ASK YOU: HAVE YOU EVER SEEN THIS DOCUMENT BEFORE IN YOUR LIFE? A. I BELIEVE THIS IS THE DOCUMENT THAT I SIGNED THAT HAS OUR OUR STATEMENT, OUR	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23	MR. KING: THIS IS NOT, SO THE DEPONENT: IT'S NOT? MR. KING: NO. WHY DON'T YOU GIVE HIM THE ONE HE SIGNED, RICHARD. REALLLY. THE DEPONENT: YEAH, BE CAUSE IT DOESN'T LOOK EXACTLY THE SAME. MR. KING: WE'LL STIPULATE THAT HE SIGNED AND VERIFIED RESPONSES TO INTERROGATORIES, IF THAT'S WHAT YOU WANT. MR. BUSCH: YES, I DO. MR. KING: WELL, WE'LL STIPULATE TO THAT. MR. BUSCH: OKAY. MR. KING: JUST DOESN'T HAPPEN TO BE EXHIBIT 32. PROBABLY EXHIBIT 33. IF YOU FLASH ME THE VERIFICATION, I'LL STIPULATE THAT THAT'S WHAT HE SIGNED AND SERVED. MR. BUSCH: I GOT IT. OKAY. WASN'T MEANT TO BE A TRICK. I JUST PULLED OUT THE WRONG ONE. ALL RIGHT. SO LET'S MARK AS THE
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23 24	Q. ALL RIGHT. ALL RIGHT. I WANT TO NOW GIVE YOU A COUPLE OF THINGS TO AUTHENTICATE FOR ME. A. OKAY. MR. BUSCH: LET'S MARK AS THE NEXT EXHIBIT MR. THICKE'S RESPONSES TO INTERROGATORIES. DEPOSITION OFFICER: EXHIBIT 32. (WHEREUPON, DEFENDANTS' EXHIBIT NUMBER 32 WAS MARKED FOR IDENTIFICATION BY THE DEPOSITION OFFICER AND IS ATTACHED HERETO.) DEPOSITION OFFICER: THERE YOU GO. THE DEPONENT: THANK YOU, LOVE. WHICH PAGE WOULD YOU LIKE ME TO GO TO? BY MR. BUSCH: Q. FIRST OF ALL, I WANT TO ASK YOU: HAVE YOU EVER SEEN THIS DOCUMENT BEFORE IN YOUR LIFE? A. I BELIEVE THIS IS THE DOCUMENT THAT I SIGNED THAT HAS OUR OUR STATEMENT, OUR RECORDED STATEMENT.	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23 24	MR. KING: THIS IS NOT, SO THE DEPONENT: IT'S NOT? MR. KING: NO. WHY DON'T YOU GIVE HIM THE ONE HE SIGNED, RICHARD. REALLLY. THE DEPONENT: YEAH, BE CAUSE IT DOESN'T LOOK EXACTLY THE SAME. MR. KING: WE'LL STIPULATE THAT HE SIGNED AND VERIFIED RESPONSES TO INTERROGATORIES, IF THAT'S WHAT YOU WANT. MR. BUSCH: YES, I DO. MR. KING: WELL, WE'LL STIPULATE TO THAT. MR. BUSCH: OKAY. MR. KING: JUST DOESN'T HAPPEN TO BE EXHIBIT 32. PROBABLY EXHIBIT 33. IF YOU FLASH ME THE VERIFICATION, I'LL STIPULATE THAT THAT'S WHAT HE SIGNED AND SERVED. MR. BUSCH: I GOT IT. OKAY. WASN'T MEANT TO BE A TRICK. I JUST PULLED OUT THE WRONG ONE. ALL RIGHT. SO LET'S MARK AS THE NEXT EXHIBIT HIS SUPPLEMENTAL HIS ANSWERS TO



Kelli Norden and Associates Court Reporters 310.820.7753 phone 310.820.7933 fax 11835 W. Olympic Boulevard Suite 680E Los Angeles, California 30064 knaekellinorden.com www.kellinorden.com

Case 2:13-cv-06004-JAK-AGR Document 122 Filed 09/15/14 Page 72 of 125 Page ID #:2641

CONFIDENTIAL DEPOSITION OF ROBIN THICKE

		T	
1	INTERROGATORIES.	1	Q. WHEN DID YOU FIRST HEAR MARVIN
2	(WHEREUPON, DEFENDANTS' EXHIBIT NUMBER	2	GAYE'S MUSIC?
3	33 WAS MARKED FOR IDENTIFICATION BY	3	A. PROBABLY WHEN I WAS 8 YEARS OLD, 9
4	THE DEPOSITION OFFICER AND IS ATTACHED	4	YEARS OLD.
5	HERETO.)	5	Q. OKAY, AND WHICH MARVIN GAYE SONGS
6	DEPOSITION OFFICER: IT'S 33,	6	AND ALBUMS DO YOU OWN OR HAVE YOU EVER OWNED?
7	BY MR. BUSCH:	7	A. I I OWNED THE GREATEST IT'S
8	Q. AND SO YOU DON'T HAVE TO LOOK	8	HARD NOW WITH ITUNES BECAUSE YOU DON'T REALLY
9	THROUGH THE WHOLE THING, MR. THICKE.	9	REMEMBER ALBUM TITLES AND STUFF LIKE THAT.
10	A. YES.	10	Q. UH-HUH.
11	Q. WHEN YOU GET HANDED THAT DOCUMENT	11	A. I HAVE A GREATEST HITS, I HAVE
12	BY THE COURT REPORTER	12	"WHAT'S GOING ON" FOR SURE, AND I HAVE AND I
13	A. YES.	13	HAVE "HERE, MY DEAR."
14	Q TURN TO THE FOURTH-FROM-THE-LAST	14	Q. OKAY, AND YOU'VE STATED PUBLICLY
15	PAGE. I BELIEVE YOU'LL SEE A VERIFICATION THAT	15	
16	HAS YOUR SIGNATURE ON IT.	1	THAT "GOT TO GIVE IT UP" IS ONE OF YOUR FAVORITE
		16	SONGS OF ALL TIME. IS THAT TRUE?
17	A. GOT IT.	17	A. ONE OF MY HUNDRED
18	(DOCUMENT HANDED TO THE DEPONENT.)	18	(SPEAKING SIMULTANEOUSLY.)
19	THE DEPONENT: AND THANK YOU.	19	MR. KING: WAIT. WAIT.
20	YES, THAT IS DEFINITELY MY	20	THE DEPONENT: ONE OF
21	SIGNATURE, EXECUTED AT THE GREENWICH HOTEL IN	21	MR. KING: OBJECT TO THE FORM.
22	NEW YORK CITY, YES.	22	MR. BUSCH: SURE.
23	BY MR. BUSCH:	23	MR. KING: ARE YOU ASKING HIM IF
24	Q. OKAY. AND YOU SIGNED AND CERTIFIED	24	YOUR YOUR QUESTION IS COMPOUND.
25	THAT YOU DECLARED UNDER PENALTY OF PERJURY ON THAT	25	111
14 commotive messace.	70		72
٦	DAGE WHERE YOU SIGNED IT THAT THE DOOLMEN'S THAT		DVMD DUOGU
1	PAGE WHERE YOU SIGNED IT THAT THE DOCUMENT THAT	1	BY MR. BUSCH;
2	THE ANSWERS ARE TRUE BASED O N YOUR KNOWLEDGE;	2	Q. I'M ASKING YOU: IS IT TRUE THAT
3	CORRECT?	3	"GOT TO GIVE IT UP" IS ONE OF YOUR FAVORITE SONGS
4	A. YES.	4	OF ALL TIME?
5	Q. OKAY. AND YOU WENT OVER EVERYTHING	5	MR. KING: OKAY, BECAUSE YOU ASKED
6	BEFORE IT WAS SENT?	6	HIM A DIFFERENT QUESTION BEFORE.
7	A. YES.	7	THE DEPONENT: OKAY. I WOULD SAY
8	Q. OKAY,	8	AFTER THE MY OWN HUNDRED SONGS, YES, IT'S ONE
9	ALL RIGHT. MR. THICKE, PUT THAT	9	OF MY FAVORITE SONGS.
10	DOCUMENT AWAY.	10	BY MR. BUSCH:
11	A. OKAY.	11	Q. OKAY,
12	Q. YOU HAVE GIVEN SEVERAL INTERVIEWS,	12	A. COMES RIGHT AFTER MY SONGS.
13	MANY INTERVIEWS, AND WE'VE PULLED THEM, ABOUT THE	13	Q. ARE YOU ARE YOU ARE YOU
14	CREATION OF "BLURRED LINES."	14	FAMILIAR WITH "ALL MUSIC GUIDES" STATEMENT THAT
15	A. YES.	15	YOU HAVE A, QUOTE, "PERPETUAL MARVIN FIXATION."
16	Q. AND I ALLUDED TO SOME OF THAT AT	16	END QUOTE?
17	THE BEGINNING OF THIS DEPOSITION BEFORE THE BREAK.	17	A. NO, NO, I HAVE NEVER HEARD THAT.
18	DO YOU RECALL THAT?	18	Q. YOU'VE NEVER HEARD THAT BEFORE?
19	A. YES.	19	A. NO.
20	Q. OKAY. I WANT TO SHOW YOU SOME OF	20	Q. OKAY, DO YOU RECALL EVER STATING
21	THOSE AND WE'LL GO OVER THEM.	21	THAT MARVIN GAYE WAS YOUR IDOL?
22	LET ME ASK, BEFORE 1 BEFORE WE	22	
23	GET INTO THAT, LET ME JUST ASK YOU SOME MORE ABOUT	i .	A. I HAVE I DO RECALL STATING THAT
23	MARVIN GAYE.	23	MARVIN AS IS ONE OF MANY OF MY IDOLS.
		24	Q. OKAY.
25	A. OKAY,	25	A. AND NO MORE THAN ANY OF MY OTHERS.



Kelli Norden and Associates Court Reporters 310.320.7733 phone 310.820.7933 fax 11833 W. Olympic Boulevard Suite 680t Los Angeles, California 90064 kna@kellinorden.com www.kellinorden.com

Case 2:13-cv-06004-JAK-AGR Document 122 Filed 09/15/14 Page 73 of 125 Page ID #:2642

CONFIDENTIAL DEPOSITION OF ROBIN THICKE

1 G. HAVE YOU EVER STATED THAT MARKIN 2 GAYE INSPIRES HALF OF YOUR MUSIC? 3 A. O. HI WOULD NOT BE TRUE? 4 BUT 5 Q. DO YOU RECALL BEING 6 AAND THAT WOULD NOT BE TRUE? 7 Q. IT WOULD NOT BE TRUE? 8 A. NOT IS SAID THAT, IT'S NOT 9 TRUE, NO. 10 Q. OKAY, WHY WOULD YOU SAY IT! IF ITS 11 NOT TRUE? 12 A. IT DEPOINS ON WHAT THE LEAD-IN WAS. 13 AND IVE BEEN COMPARED TO IV'S BEEN CALLED THE 14 "WHITE MARKIN GAYE" SINCE I WAS			}	
2 GAYE INSPIRES HALF OF YOUR MUSIC? 3 A. OH, INVOLUNT RECALL SAYING THAT, 4 BUT - 5 Q. DO YOU RECALL BEING - 6 AAND THAT WOULDN'T BE TRUE. 7 Q. IT WOULD NOT BE TRUE? 8 A. NOT -IF I SAD THAT, IT'S NOT 9 Q. OKYY. WHY WOULD YOU SAY IT IF IT'S 11 NOT TRUE? 12 A. IT DEPENDS ON WHAT THE LEAD-IN WAS. 13 AND IVE BEEN COMPARED TO - IVE BEEN CALLED THE 14 "WHAT END KINE WAS SAKED OF YOU." 15 STARTED, SO I THINK IVE EMBRACED THAT, CONSIDER 16 IT AN HONOR. 17 AND SO - SO SOMETIMES, IF SOMEDOY 18 IS LEADING YOU INTO, YOU KNOW, BEING COMPARED TO 19 OR CONNECTING WITH MARVIN GAYE INSIDE INSTITUTE OF YOUR WISHON THE INSPIRES HALF OF 20 MY' - 21 FAVORTES, I' WOULD GO, "OH, HE INSPIRES HALF OF 22 MY' - 23 Q. OKAY. SO - SO YOU'RE TELLING ME 24 SUBJECTS PUBLICLY. 25 Q. OKAY. SO - SO YOU'RE TELLING ME 26 THAT I'S YOU STATED ON THE "OPPAH WINFREY SHOW" 27 THAT MARVIN GAYE INSPIRES HALF OF YOUR MUSIC, THAT 28 SONGS, THEY SOUND NOTHING LIKE OR HAVE ANY 29 CONNECTION TO HIM OR HIS MUSIC. 20 CONNECTION TO HIM OR HIS MUSIC. 21 CONNECTION TO HIM OR HIS MUSIC. 22 A. I'LL RIGHT. LET'S ME MARK AS THE NEXT 23 CONNECTION TO HIM OR HIS MUSIC. 24 A. I CHAPUH. 25 CONNECTION TO HIM OR HIS MUSIC. 26 CONNECTION TO HIM OR HIS MUSIC. 27 A. LIH-HUH. 28 CAN AMPRICE OR IDENTIFICATION BY 29 THE DEPOOSITION OFFICER. THIS IS SA. 29 COKAY. DID YOU SEE THAT QUESTION? 30 CONNECTION TO HIM OR HIS MUSIC. 31 CAN AND SOUND THE WAS MARKED AS THE NEXT 32 CONNECTION TO HIM OR HIS MUSIC. 32 CONNECTION TO HIM OR HIS MUSIC. 33 CONNECTION TO HIM OR HIS MUSIC. 34 CHAPTING AND THE CONNECTION TO HIM OR HIS MUSIC. 35 CONNECTION TO HIM OR HIS MUSIC. 36 CONNECTION TO HIM OR HIS MUSIC. 37 CONNECTION TO HIM OR HIS MUSIC. 38 CONNECTION TO HIM OR HIS MUSIC. 39 CONNECTION TO HIM OR HIS MUSIC. 30 CONNECTION TO HIM OR HIS MUSIC. 31 THAT I HAVE THE CONNECTION BY 31 THAT I HAVE THE CONNECTION BY 32 CONNECTION TO HIM OR HIS MUSIC. 31 CONNECTION TO HIM OR HIS MUSIC. 32 CONNECTION TO HIM OR HIS MUSIC. 33 CONNECTION TO HIM OR HIS MUSIC. 34 CONNECTION TO HIM OR HIS MUSIC. 35 CONNECTION T	1	O HAVE VOLLEVER STATED THAT MARVIN		A VEC
A	li .		1	
## BUT -	II		_	
DEPOSITION OFFICER: 34. 2	II		i –	
BY MR. BUSCH: Q. ITWOULD NOT BE TRUE? A. NOT - IF I SAID THAT, IT'S NOT TRUE, NO. O. GVAY. WHY WOULD YOU SAY IT IF IT'S I. Q. GVAY. WHY WOULD YOU SAY IT IF IT'S AND TRUE? A. IT IDEPENDS ON WHAT THE LEAD-IN WAS. AND IVE BEEN COMPARED TO - IV'S BEEN CALLED THE "WHITE MARNIN GAYE'S INCE I WAS - SINCE I GOT IT AND BO. — SO SOMETIMES, IF SOMESDOY BIS IS LEADING YOU INTO, YOU KNOW, BEING COMPARED TO OR CONNECTING WITH MARNIN GAYE, I, MIGHT EMBELLISH. INSTEAD OF SAYING, "OH, MARNIN IS ONE OF MY SUBJECTS PUBLICLY. Q. OKAY. SO — SO YOU'RE TELLING ME THAT IF YOU STATED ON THE "OPRAH WIMPREY SHOW" THAT MARVIN GAYE INSPIRES HALF OF YOU'R MUSIC, THAT IS - A THAT IS ALIE. ABSOLUTELY, Q. OKAY. Q. OKAY. A THAT IS ALIE. ABSOLUTELY, A THAT IS ALIE. ABSOLUTELY, Q. OKAY. A THAT IS ALIE. ABSOLUTELY, A THAT IS ALIE. ABSOLUTELY, Q. OKAY. A THAT IS ALIE. ABSOLUTELY, A THAT IS ALIE. ABSOLUTELY, Q. OKAY. A THAT IS ALIE. ABSOLUTELY, A THAT IS ALIE. ABSOLUTELY, Q. OKAY. A	II		1	
2			1	
8	II		-	
9	II		7	
10 Q. OKAY. WHY WOULD YOU SAY IT IF IT'S 11 NOT TRUE? 12 A. IT DEPENDS ON WHAT THE LEADIN WAS. 13 AND I'VE BEEN COMPARED TO - I'VE BEEN CALLED THE 14 "WHITE MARVIN GAYE" SINCE I WAS. SINCE I GOT 15 STARTED, SO I THINK I'VE EMBRACED THAT, CONSIDER 16 IT AN HONOR. 17 AND SO - SO SOMETIMES, IF SOMEBODY 18 IS LEADING YOU INTO, YOU KNOW, BEING COMPARED TO 19 OR CONNECTING WITH MARVIN GAYE, I MIGHT EMBELLISH. 10 INSTEAD OF SAYING, "OH, MARVIN IS ONE OF MY 19 FAVORITES," I WOULD GO, "OH, HE INSPIRES HALF OF 20 INSTEAD OF SAYING, "OH, MARVIN IS ONE OF MY 21 FAVORITES," I WOULD GO, "OH, HE INSPIRES HALF OF 22 MY". 23 I ALSO EMBELLISH ON MANY OTHER 24 SUBJECTS PUBLICLY. 25 Q. OKAY. SO - SO YOU'RE TELLING ME 26 THAT I'R YOU STATED ON THE "OPPRAH WINFREY SHOW" 27 THAT MARVIN GAYE INSPIRES HALF OF YOU'R MUSIC, THAT 28 I IS. 29 Q. OKAY. 20 OKAY. 21 THAT I'R YOU STATED ON THE "OPPRAH WINFREY SHOW" 21 THAT MARVIN GAYE INSPIRES HALF OF YOU'R MUSIC, THAT 22 I I ON OKAY. 23 I I ALSO EMBELLISH ON MANY OTHER 24 SUBJECTS PUBLICLY. 25 Q. OKAY. 26 A I COULD PLAY SO PERCENT OF MY 27 SONOS, THEY SOUND NOTHING LIKE OR HAVE ANY 28 CONNECTION TO HIM OR HIS MUSIC. 29 Q. OKAY. 30 C. OKAY. 31 A UHHUH. 32 "G.O." - 31 A UHHUH. 31 FAHIBIT AN INTERVIEW THAT MR. THICKE GAVE TO 31 THE DEPOSITION OFFICER AND IS ATTACHED 32 "G.O." - 33 A UHHUH. 34 WAS MARKED FOR IDENTIFICATION BY 35 ONOS, THEY SOUND NOTHING LIKE OR HAVE ANY 36 ON OWE SET THAT THOU TO TURN YOUR ATTENTION TO 37 THE DEPOSITION OFFICER AND IS ATTACHED 38 A UHHUH. 39 ON ON OWN THAT THE LEADIN WAS. 39 ON OWN THAT THE LEADIN WAS. 31 A UHHUH. 31 THE DEPOSITION OFFICER AND IS ATTACHED 32 MARK AS THE NEXT EXHIBIT. 34 WAS MARKED FOR IDENTIFICATION BY 35 ON OWN THAT THAN YOU. 36 ON OWN THAT THAN YOU. 37 ON OWN THAT THAN YOU. 38 ON THE SUBJECTS WHITE THAN YOU. 39 ON OWN THAT THAN YOU. 40 OF "BLURRED LINES". 41 ON YOU SEE THAT TO TURN YOUR ATTENTION TO TWIN TO TWI	8	A. NOT IF I SAID THAT, IT'S NOT	8	YOUR FACE PICTURE ON IT; CORRECT?
11. NOT TRUE? 12. A. IT DEPENDS ON WHAT THE LEAD-IN WAS. 13. AND IVE BEEN COMPARED TO IVE BEEN CALLED THE 14. "WHITE MARKIN GAYE' SINCE I WAS SINCE I GOT 15. STARTED, SO I THINK IVE MERRACOED THAT, CONSIDER 16. IT AN HONOR. 17. AND SO SO SOMETIMES, IF SOMEBODY 18. IS LEADING YOU INTO, YOU KNOW, BEING COMPARED TO 19. OR CONNECTING WITH MARKIN GAYE, I MIGHT EMBELLISH. 19. OR CONNECTING WITH MARKIN GAYE, I MIGHT EMBELLISH. 20. INSTEAD OF SAYING, "OH, MARKIN IS ONE OF MY 21. FAVORITES," I WOULD GO, "OH, HE INSPIRES HALF OF 22. MY". 23. I ALSO EMBELLISH ON MANY OTHER 24. SUBJECTS PUBLICLY. 25. O. CKAY, SO SO YOU'RE TELLING ME 26. OKAY, SO SO YOU'RE TELLING ME 27. THAT IF YOU STATED ON THE "OPRAH WINFREY SHOW" 28. THAT IS A LIE. ABSOLUTELY. 39. O. CKAY. 40. OKAY. 41. COULD PLAY 80 PERCENT OF INY 42. CONNECTION TO HIM OR HIS MUSIC. 43. A LOULD PLAY 80 PERCENT OF INY 44. CONNECTION TO HIM OR HIS MUSIC. 45. O. CKAY. 46. CONNECTION TO HIM OR HIS MUSIC. 47. THAT IS ALIE. ABSOLUTELY. 48. CONNECTION TO HIM OR HIS MUSIC. 49. O. CKAY. 40. OKAY. 41. COULD PLAY 80 PERCENT OF INY 42. CONNECTION TO HIM OR HIS MUSIC. 43. A LIFE OF YOUR MUSIC. 44. A LIFE OF YOUR MUSIC. 45. A LOULD PLAY 80 PERCENT OF INY 46. CONNECTION TO HIM OR HIS MUSIC. 47. THAT IS ALIE. ABSOLUTELY. 48. CONNECTION TO HIM OR HIS MUSIC. 49. O. CKAY. 40. OKAY. 41. COULD PLAY 80 PERCENT OF INY 42. O. OKAY. 43. CONNECTION TO HIM OR HIS MUSIC. 44. A LIFE OF YOUR MUSIC. 45. O. OKAY. 46. O. WHY DID YOU SAY IT IF IT'S NOT 47. THE DEPOSITION OFFICER AND IS ATTACHED 48. HERETO.) 49. O. CHAY. 40. O. WHY DID YOU SAY IT IF IT'S NOT 40. O. OKAY. 50. O. OKAY. 51. D. OYOU SEE THAT QUESTION THAT 51. O. OKAY. 52. O. OKAY. 53. O. OKAY. 54. THAT IS A LIE. ABSOLUTELY. 55. O. OKAY. 56. O. OKAY. 57. O. OKAY. 58. O. OKAY. 59. O. O	9	TRUE, NO.	9	A. YES, SIR.
A. IT DEPENDS ON WHAT THE LEAD IN WAS. AND IVE BEEN COMPARED TO - IVE BEEN CALLED THE "WHITE MARVIN GAYE" SINCE I WAS - SINCE I GOT STARTED. SO I THINK I'VE EMBRACED THAT, CONSIDER IT AH HONOR. AND SO - SO SOMETIMES, IF SOMEBODY AND SO - SO SOMETIMES, IF SOMEBODY BIS LEADING YOU INTO, YOU KNOW, BEING COMPARED TO OR CONNECTING WITH MARVIN GAYE, I MIGHT EMBELLISH. INSTEAD OF SAYING, "OH, MARVIN IS ONE OF MY BIS LEADING YOU INTO, YOU KNOW, BEING COMPARED TO OR CONNECTING WITH MARVIN GAYE, I MIGHT EMBELLISH. INSTEAD OF SAYING, "OH, MARVIN IS ONE OF MY BIS LEADING YOU INTO, YOU KNOW, BEING COMPARED TO OR CONNECTING WITH MARVIN GAYE, I MIGHT EMBELLISH. INSTEAD OF SAYING, "OH, MARVIN IS ONE OF MY BIS LABOR OF SAYING," OH, MARVIN IS ONE OF MY BIS LABOR OF SAYING, "OH, MARVIN IS ONE OF MY BIS LABOR OF SAYING," OH, MARVIN IS ONE OF MY BIS LABOR OF SAYING, "OH, MARVIN IS ONE OF MY BIS LABOR OF SAYING," OH, MARVIN IS ONE OF MY BIS LABOR OF SAYING, "OH, MARVIN IS ONE OF MY BIS LABOR OF SAYING," OH, MARVIN IS ONE OF MY BIS LABOR OF SAYING, "OH, MARVIN IS ONE OF MY BIS LABOR OF SAYING," OH, MARVIN IS ONE OF MY BIS LABOR OF SAYING, "OH, MARVIN IS ONE OF MY BIS LABOR OF SAYING, "OH, MARVIN IS ONE OF MY BIS LABOR OF SAYING," OH, MARVIN IS ONE OF MY BIS LABOR OF SAYING, "OH, MARVIN IS ONE OF MY BIS LABOR OF SAYING, "OH, MARVIN IS ONE OF MY BIS LABOR OF SAYING, "OH, MARVIN IS ONE OF MY BIS LABOR OF SAYING, "OH, MARVIN IS ONE OF MY BIS LABOR OF SAYING, "OH, MARVIN IS ONE OF MY BIS LABOR OF SAYING, "OH, MARVIN IS ONE OF MY BIS LABOR OF MY BIS LABOR OF SAYING, "OH, MARVIN IS ONE OF MY BIS LABOR	10	Q. OKAY. WHY WOULD YOU SAY IT IF IT'S	10	Q. FOR "G,Q, MAGAZINE."
AND IVE BEEN COMPARED TO - IVE BEEN CALLED THE "WHITE MARVIN GAYE" SINCE I WAS - I SMICE I GOT STARTED. SO I THINK I'VE EMBRAGED THAT, CONSIDER IT AN HONDR. AND SO - SO SOMETIMES, IF SOMEBODY IS LEADING YOU INTO, YOU KNOW, BEING COMPARED TO OR CONNECTING WITH MARVIN GAYE, I MIGHT EMBELLISH. INSTEAD OF SAYINS, "OH, MARVIN IS ONE OF MY FAVORITES," I WOULD GO, "OH, HE INSPIRES HALF OF SUBJECTS PUBLICLY. OKAY. SO - SO YOU'RE TELLING ME THAT IF YOU STATED ON THE "OFRAH WINFREY SHOW" THAT MARVIN GAYE INSPIRES HALF OF YOU'R MUSIC, THAT IS - A. THAT IS A LIE. ABSOLUTELY. C. OKAY. C. THAT I'VE SINGLE "BURNTED" SUBJECTS PUBLICLY. CO KAY. SO - SO WETTER SOME BURNTED THAT I'VE YOU SAY, GAYE, GOT TO THAT I'VE YOU STATED ON THE "OFRAH WINFREY SHOW" THAT MARVIN GAYE INSPIRES HALF OF YOU'R MUSIC, THAT IS - A. THAT IS A LIE. ABSOLUTELY. C. OKAY. C. THAT I'VE YOU'R NEW SINGLE "BLUNRED" LINES'?" PHARRELL AND I WERE IN THE STUDIO AND I TOLD HIM THAT ONE OF MY FAVORITE SONGS OF ALL TIMES WAS MARVIN GAYE S'GOT TO THAT I'VE YOU STATED ON THE "OFRAH WINFREY SHOW" THAT MARVIN GAYE INSPIRES HALF OF YOU'R MUSIC, THAT IS - A. COULD PLAY 90 PERCENT OF MY SONGS. THEY SOUND NOTHING LIKE OR HAVE ANY CONNECTION TO HIM OR HIS MUSIC. CONNECTION TO HIM OR HIS MUSIC. A. LICHULD PLAY 90 PERCENT OF MY CONNECTION TO HIM OR HIS MUSIC. A. LICHULD PLAY 90 PERCENT OF MY CONNECTION TO HIM OR HIS MUSIC. A. LICHULD PLAY 90 PERCENT OF MY CONNECTION TO HIM OR HIS MUSIC. A. LICHULD PLAY 90 PERCENT OF MY CONNECTION TO HIM OR HIS MUSIC. A. LICHULD PLAY 90 PERCENT OF MY CONNECTION TO HIM OR HIS MUSIC. A. LICHULD PLAY 90 PERCENT OF MY CONNECTION TO HIM OR HIS MUSIC. A. LICHULD PLAY 90 PERCENT OF MY CONNECTION TO HIM OR HIS MUSIC. A. LICHULD PLAY 90 PERCENT OF MY CONNECTION TO HIM OR HIS MUSIC. A. COULD PLAY 90 PERCENT OF MY CONNECTION TO HIM OR HIS MUSIC. A. COULD PLAY 90 PERCENT OF MY CONNECTION TO HIM OR HIS MUSIC. A. COULD PLAY 90 PERCENT OF MY CONNECTION TO HIM OR HIS MUSIC. A. COULD PLAY 90 PERCENT OF MY CONNECTION TO HIM OR HIS MUSIC. A.	11	NOT TRUE?	11	I WANT TO TURN YOUR ATTENTION TO
14 Q. — OF THIS, IF I COULD. AND THE 15 STARTED, SO I THINK I'VE EMBRACED THAT, CONSIDER 16 IT AN HONOR. 17 AND SO — SO SOMETIMES, IF SOMEBODY 18 IS LEADING YOU INTO, YOU KNOW, BEING COMPARED TO 19 OR CONNECTING WITH MARKIN GAYE, I MIGHT EMBELLISH. 11 INSTEAD OF SAYING, "OH, MARKIN IS DIVE OF MY 20 INSTEAD OF SAYING, "OH, MARKIN IS DIVE OF MY 21 FAVORITES," I WOULD GD, "OH, HE INSPIRES HALF OF 22 MY" — 23 ILASO EMBELLISH ON MANY OTHER 24 SUBJECTS PUBLICLY. 25 Q. OKAY. SO — SO YOU'RE TELLING ME 26 THAT IF YOU STATED ON THE "OPRAH WINFREY SHOW" 27 THAT IF ARVIN GAYE INSPIRES HALF OF YOUR MUSIC, THAT 28 IS — 4 A. THAT IS A LIE. ABSOLUTELY. 4 A. THAT IS A LIE. ABSOLUTELY. 5 Q. OKAY. 5 Q. OKAY. 6 A. I COULD PLAY 90 PERCENT OF MY 7 SONGS. THEY SOUND NOTHING LIKE OR HAVE ANY 7 SONGS. THEY SOUND NOTHING LIKE OR HAVE ANY 8 O. OKAY. 9 Q. OKAY. 10 ALL RICHT. LET ME MARK AS THE NEXT 11 EXHIBIT AN INTERVIEW THAT MR. THICKE GAVE TO 12 THAT BE OPPOSITION OFFICER: THIS IS 34. 12 (DOCUMENT HANDEOUT OF THE DEPONENT.) 13 THE DEPOSITION OFFICER RAND IS ATTACHED 14 Q. —"MAGAZINE" 15 MARK AS THE NEXT EXHIBIT. 16 (WHEREUPON, DEFENDANTS' EXHIBIT NUMBER 17 34 WAS MARKED FOR IDENTIFICATION BY 18 THEO PROSITION OFFICER: THIS IS 34. 19 CONCUMENT HAND KOW. 21 THE DEPOSITION OFFICER THIS IS 34. 22 (DOCUMENT HANDEOUT OF THE DEPONENT.) 23 ON IMPROSITION OFFICER THIS IS 34. 24 (DOCUMENT HANDEOUT OF THE DEPONENT.) 25 ON, WHO'S THAT HANDSOME DEVIL? 26 DY MR BUSCH: 27 BY MR BUSCH: 28 DY THAT RECEIVED HAVE ANY OF "BURRED HIS EARLIER. 29 ON ONLY OF OUR AND HE BELIEVE YOU AND WASHED THE SERVING THE RECEIT ON MY CAREER WAS WRITTEN AND PRODUCED BY SOMEBODY 26 DEPOSITION OFFICER THIS IS 34. 27 CONCUMENT HANDEOUT OF THE DEPONENT.) 28 DY ONLY SER THAT HAND SOME DEVIL? 29 DO YOU SEE THAT QUESTION THE 20 CHAPT. 21 THE DEPOSITION OFFICER THIS IS 34. 22 (DOCUMENT HANDEOUT OF THE DEPONENT.) 23 ONLY SOURCE THAT CHAPT. 24 DAY OF "BURRED HIS SEALLED." 25 ONLY SOURCE THAT CONCUMENT THE SOURD OF THE SEALLED. 26 ONLY SOURCE THAT CONCUMENT THE SOURCE THE SEALLED. 27	12	A. IT DEPENDS ON WHAT THE LEAD-IN WAS.	12	PAGE 2
14 Q. — OF THIS, IF I COULD. AND THE 15 STARTED, SO I THINK I'VE EMBRACED THAT, CONSIDER 16 IT AN HONOR. 17 AND SO — SO SOMETIMES, IF SOMEBODY 18 IS LEADING YOU INTO, YOU KNOW, BEING COMPARED TO 19 OR CONNECTING WITH MARKIN GAYE, I MIGHT EMBELLISH. 11 INSTEAD OF SAYING, "OH, MARKIN IS DIVE OF MY 20 INSTEAD OF SAYING, "OH, MARKIN IS DIVE OF MY 21 FAVORITES," I WOULD GD, "OH, HE INSPIRES HALF OF 22 MY" — 23 ILASO EMBELLISH ON MANY OTHER 24 SUBJECTS PUBLICLY. 25 Q. OKAY. SO — SO YOU'RE TELLING ME 26 THAT IF YOU STATED ON THE "OPRAH WINFREY SHOW" 27 THAT IF ARVIN GAYE INSPIRES HALF OF YOUR MUSIC, THAT 28 IS — 4 A. THAT IS A LIE. ABSOLUTELY. 4 A. THAT IS A LIE. ABSOLUTELY. 5 Q. OKAY. 5 Q. OKAY. 6 A. I COULD PLAY 90 PERCENT OF MY 7 SONGS. THEY SOUND NOTHING LIKE OR HAVE ANY 7 SONGS. THEY SOUND NOTHING LIKE OR HAVE ANY 8 O. OKAY. 9 Q. OKAY. 10 ALL RICHT. LET ME MARK AS THE NEXT 11 EXHIBIT AN INTERVIEW THAT MR. THICKE GAVE TO 12 THAT BE OPPOSITION OFFICER: THIS IS 34. 12 (DOCUMENT HANDEOUT OF THE DEPONENT.) 13 THE DEPOSITION OFFICER RAND IS ATTACHED 14 Q. —"MAGAZINE" 15 MARK AS THE NEXT EXHIBIT. 16 (WHEREUPON, DEFENDANTS' EXHIBIT NUMBER 17 34 WAS MARKED FOR IDENTIFICATION BY 18 THEO PROSITION OFFICER: THIS IS 34. 19 CONCUMENT HAND KOW. 21 THE DEPOSITION OFFICER THIS IS 34. 22 (DOCUMENT HANDEOUT OF THE DEPONENT.) 23 ON IMPROSITION OFFICER THIS IS 34. 24 (DOCUMENT HANDEOUT OF THE DEPONENT.) 25 ON, WHO'S THAT HANDSOME DEVIL? 26 DY MR BUSCH: 27 BY MR BUSCH: 28 DY THAT RECEIVED HAVE ANY OF "BURRED HIS EARLIER. 29 ON ONLY OF OUR AND HE BELIEVE YOU AND WASHED THE SERVING THE RECEIT ON MY CAREER WAS WRITTEN AND PRODUCED BY SOMEBODY 26 DEPOSITION OFFICER THIS IS 34. 27 CONCUMENT HANDEOUT OF THE DEPONENT.) 28 DY ONLY SER THAT HAND SOME DEVIL? 29 DO YOU SEE THAT QUESTION THE 20 CHAPT. 21 THE DEPOSITION OFFICER THIS IS 34. 22 (DOCUMENT HANDEOUT OF THE DEPONENT.) 23 ONLY SOURCE THAT CHAPT. 24 DAY OF "BURRED HIS SEALLED." 25 ONLY SOURCE THAT CONCUMENT THE SOURD OF THE SEALLED. 26 ONLY SOURCE THAT CONCUMENT THE SOURCE THE SEALLED. 27	13	AND I'VE BEEN COMPARED TO I'VE BEEN CALLED THE	1.3	A. OKAY.
STARTED. SO THINK I'VE EMBRACED THAT, CONSIDER 16 IT AN HONOR. 17 AND SO - SO SOMETIMES, IF SOMEBODY 17 BEHIND YOUR NEW SINGLE 'BLURRED 18 LEADING YOU INTO, YOU INOW, SEINER COMPARED TO 18 LEADING YOU INTO, YOU INOW, SEINER COMPARED TO 19 OR CONNECTING WITH MARVIN GAYE, I MIGHT EMBELLISH. 19 DO YOU SEE THAT QUESTION? A. YES, SIR. 20 OKAY. AND YOU SAY, QUOTE: "PHARRELL AND I WERE IN THE STUDIO AND I TOLD HIN THAT ONE OF MY" - 22 "PHARRELL AND I WERE IN THE STUDIO AND I TOLD HIN THAT ONE OF MY" - 24 ONE OF MY PAYORITE SONOS OF ALL TIMES WAS MARVIN GAYE INSPIRES HALF OF YOUR MUSIC, THAT 3 IS - GIVE IT UP. I WAS LIKE, DAMN, WE SHOULD MAKE SOMETHING LIKE 1 THAT IS A LIE. ABSOLUTELY. 4 GROOVE' THEN HE STARTED GROOVE' THE STARTEMENT THUS! GROOVE' THEN HE STARTED GROOVE' THEN H	14		1	
16 "WHAT'S THE ORIGIN STORY 17 AND SO - SO SOMETIMES, IF SOMEBODY 18 IS LEADING YOU INTO, YOU KNOW, BEING COMPARED TO 19 OR CONNECTING WITH MARKIN GAYE, I MIGHT EMBELLISH, 20 INSTEAD OF SAYING, "OH, MARVIN IS ONE OF MY 21 FAVORITES," I WOULD GO, "OH, HE INSPIRES HALF OF 22 MY" 23 I ALSO EMBELLISH ON MANY OTHER 24 SUBJECTS PUBLICLY. 25 Q. OKAY. SO - SO YOU'RE TELLING ME 26 JUSTICE OF JUSTIC	II		1	
17 AND SO - SO SOMETIMES, IF SOMEBODY 18 IS LEADING YOU INTO, YOU KNOW, BEING COMPARED TO 19 OR CONNECTING WITH MARKIN GAYE, I MIGHT EMBELLISH. 20 INSTEAD OF SAYING, "OH, MARKIN IS ONE OF MY 21 FAVORITES," I WOULD GO, "OH, HE INSPIRES HALF OF 22 MY" 23 I ALSO EMBELLISH ON MANY OTHER 24 SUBJECTS PUBLICLY. 25 Q. OKAY. SO - SO YOU'RE TELLING ME 26 THAT IF YOU STATED ON THE "OPRAH WINFREY SHOW" 27 THAT IF YOU STATED ON THE "OPRAH WINFREY SHOW" 28 THAT MARKIN GAYE INSPIRES HALF OF YOU'R MUSIC, THAT 39 IS 4 A. THAT IS A LIE. ABSOLUTELY. 5 Q. OKAY. 6 A. I COULD PLAY 90 PERCENT OF MY 7 SONGS. THEY SOUND NOTHING LIKE OR HAVE ANY 8 CONNECTION TO HIM OR HIS MUSIC. 9 Q. OKAY. 10 CONNECTION TO HIM OR HIS MUSIC. 11 EXHIBIT AN INTERVIEW THAT MR. THICKE GAVE TO 12 "G.Q." 13 A. LIH-HUH. 14 Q "MAGAZINE." 15 MARK AS THE NEXT EXHIBIT. 16 (WHEREUPON, DEFENDANTS' EXHIBIT NUMBER 17 AS WAS MARKED FOR IDENTIFICATION BY 18 HERBETO) 19 DEPOSITION OFFICER: THIS IS 34, 20 Q. OKAY. 21 COOLUMENT HANDED TO THE DEPONENT.) 22 THE DEPONENT: THANK YOU. 23 OPEN STION OFFICER AND IS ATTACHED 24 BY MR. BUSCH: 25 BEHIND YOUR NEW SINGLE 'BLURED 18 LINES'?" 10 DO YOU SEE THAT QUESTION? 26 A. YES, SIR. 27 Q. OKAY, AND YOU SAY, QUOTE: 28 THAT STUDIO AND I TOLD HIM THAT 29 THE STUDIO AND I TOLD HIM THAT 20 ONE OF MY FAVORITE SONGS OF ALL 21 TIMES WAS MARVIN GAYE'S 'GOT TO 24 THAT IS ALIE. AND YOU SAY, QUOTE: 25 THAT QUESTION OF THE MID THAT AND SOME SHALE USE. 26 THAT YES, SIR. 27 Q. OKAY, AND YOU SAY, QUOTE: 27 THAT IS WAS LIKE, "DAMN, 28 SHOULD AND I THAT HAT THAT 29 THAT I WAS LIKE, "DAMN, 29 WE SHOULD ANA SE SALIKE, "DAMN, 20 WE SHOULD MAKE SOMETHING LIKE 21 THAT I WAS LIKE, "DAMN, 21 WE SHOULD AND I THE STUDIO AND I THAT 21 GRIVE IT UP. I WAS LIKE, "DAMN, 22 WE SHOULD MAKE SOMETHING LIKE 24 GROOVE. THEN HE STATED 25 THAT I WAS LIKE, "DAMN, 26 LITERALLY WAS LIKE, "DAMN, 27 WE SHOULD MAKE SOMETHING LIKE 28 DAY THAT HAT THE OPPOSED IN THAT 29 DAY ONE STATED 20 DAY ONE STATED 20 DAY ONE STATED 21 THAT I WAS LIKE, "DAMN, 21 THAT, SOMETHI	II	•	1	
18 IS LEADING YOU INTO, YOU KNOW, BEING COMPARED TO OR CONNECTING WITH MARKIN GAYE, IMIGHT EMBELLISH. 19 DO YOU SEE THAT QUESTION? A. YES, SIR. 20 (CAY, AND YOU SAY, QUOTE: PAVORITES," I WOULD GO, "OH, HE INSPIRES HALF OF WY" 22 PHARRELL AND I WERE IN INTERVIEW SUBJECTS PUBLICLY. 24 ONE OF MY FAVORITE SONGS OF ALL TIMES WAS MARVIN GAYE'S "GOT TO THAT IF YOU STATED ON THE "OPRAH WINFREY SHOW" 25 THAT IS A LIE. ABSOLUTELY. 26 O. OKAY. AND YOU SAY, QUOTE: PHARRELL AND I WERE IN INTERVIEW THAT IS A LIE. ABSOLUTELY. 26 O. OKAY. SO - SO YOU'RE TELLING ME 76 THAT IS A LIE. ABSOLUTELY. 27 O. OKAY. 28 O. OKAY. 39 O. OKAY. 30 O. OKAY. 31 O. OKAY. 31 O. OKAY. 31 O. OKAY. 32 O. OKAY. 34 O. OKAY. 35 O. OKAY. 36 O. OKAY. 37 O. OKAY. 37 O. OKAY. 37 O. OKAY. 38 O. OKAY. 39 O. OKAY. 39 O. OKAY. 30 O. OKAY. 31 O. OKAY. 31 O. OKAY. 32 O. OKAY. 34 O. OKAY. 35 O. OKAY. 36 O. OKAY. 37 O. OKAY. 38 O. OKAY. 39 O. OKAY. 30 O. OKAY. 31 O. OKAY. 31 O. OKAY. 32 O. OKAY. 34 O. OKAY. 35 O. OKAY. 35 O. OKAY. 36 O. OKAY. 37 O. OKAY. 37 O. OKAY. 38 O. OKAY. 39 O. OKAY. 38 O. OKAY. 39 O. OKAY. 38 O. OKAY. 39 O. OKAY. 30 O. OKAY. 3	II		1	
OR CONNECTION WITH MARVIN GAYE, I MIGHT EMBELLISH. INSTEAD OF SAYING, "OH, MARVIN IS ONE OF MY INSTEAD OF SAYING, "OH, MARVIN IS ONE OF MY FAVORITES," I WOULD GO, "OH, HE INSPIRES HALF OF MY" I ALSO EMBELLISH ON MANY OTHER I JUBJECTS PUBLICLY. C. OKAY. SO SO YOU'RE TELLING ME THAT IF YOU STATED ON THE "OPRAH WINFREY SHOW" THAT MARVIN GAYE INSPIRES HALF OF YOU'R MUSIC, THAT I SI A. THAT IS A LIE. ABSOLUTELY. C. OKAY. CONNECTION TO HIM OR HIS MUSIC. CO. OKAY. CONNECTION TO HIM OR HIS MUSIC. CO. OKAY. A. I COULD PLAY 90 PERCENT OF MY CONNECTION TO HIM OR HIS MUSIC. CO. OKAY. A. LICHUP! THAT SAYIN GAYE THE STATED O. OKAY. A. LICHUP! THAT WROTE THE SONG IN A CONNECTION TO HIM OR HIS MUSIC. CO. OKAY. A. LICHUP! THAT TAR. THICKE GAVE TO MARK AS THE NEXT THAT STATEMENT TRUE? A. NO. C. OKAY. A. NO. C. OKAY. A. O. OKAY. A. O. OKAY. A. YES, SIR. THAT SOMETHING WITH THAT GROOVE: THEN HE STARTED IT HAT, SOMETHING WITH THAT GROOVE: THEN HE STARTED THAT, SOMETHING WITH THAT GROOVE: THEN HE STARTED THAT HOUR AND RECORDED II'' DO YOU SEE THAT QUESTION? THAT SOMETHING WITH THAT THAT HAT STATEMENT TRUE? A. YES, SIR. II'' DO YOU SEE THAT QUESTION? A. YES, SIR. THAT HOUR AND RECORDED THE FILL ABSOLUTELY. A. YES, SIR. THAT HOUR AND RECORDED THE FILL ABSOLUTE THE SONG IN THAT THAT STATEMENT TRUE? A. NO. C. STATE ON THE STATED THAT STATEMENT TRUE? A. NO. C. WHY DID YOU SAY IT IF IT'S NOT TRUE? A. NO. C. WHY DID YOU SAY IT IF IT'S NOT TRUE? A. NO. C. OKAY. DID YOU AND HIS BELIEVE YOU ANSWERED THIS EARLIER. OO F "BLURRED LINES" NOR DURING THE PROCESS DID YOU AND PHARRELL AND YOU, SHAPE OR FORM THE CREDIT. SO OKEY THAT HANDSOME DEVIL? AND PHARRELL AND YOU, SHAPE OR FORM THE AND PHARRELL AND YOU SA	II	•	1	
20	II	·	1	
FAVORITES,* I WOULD GO, "OH, HE INSPIRES HALF OF MY" -	II	· · · · · · · · · · · · · · · · · · ·	1	
22 MY" -	II		1	
23	II	, ,	1	
SUBJECTS PUBLICLY. Q. OKAY. SO - SO YOURE TELLING ME	II		1	
TIMES WAS MARVIN GAYE'S 'GOT TO	li .		1	
THAT IF YOU STATED ON THE "OPRAH WINFREY SHOW" THAT MARVIN GAYE INSPIRES HALF OF YOUR MUSIC, THAT IS A. A. THAT IS A LIE. ABSOLUTELY. O. OKAY. SONGS. THEY SOUND NOTHING LIKE OR HAVE ANY CONNECTION TO HIM OR HIS MUSIC. ALL RIGHT. LET ME MARK AS THE NEXT SHIP THAT SALE ABSOLUTE MARK AS THE NEXT THE DEPONENT: EXHIBIT NUMBER (WHEREUPON, DEFENDANTS' EXHIBIT NUMBER (WHEREUPON, DEFENDANTS' EXHIBIT NUMBER (WHEREUPON, DEFENDANTS' EXHIBIT NUMBER HERETO.) DEPOSITION OFFICER AND IS ATTACHED HERETO.) DEPOSITION OFFICER: THIS IS 34. OH, WHO'S THAT HANDSOME DEVIL? BY MR. BUSCH: D. ALL RIGHT. MR. THICKE — OR OF "BLURRED LINES" NOR DURING THE REGORD THE STATE MANY BELIEVE YOU ANSWERED THIS EARLIER. OR OVEL THEN HAS SAME, DAMN, WE SHOULD MAKE SOMETHING LIKE THAT I WAS LIKE, 'DAMN, WE SHOULD MAKE SOMETHING LIKE THAT I SACHLE, DAMN, WE SHOULD MAKE SOMETHING LIKE THAT I SACHLE, DAMN, WE SHOULD MAKE SOMETHING LIKE THAT I WAS LIKE, 'DAMN, WE SHOULD MAKE SOMETHING LIKE THAT I WAS SHOULD MAKE SOMETHING LIKE THAT I WAS LIKE, 'DAMN, WE SHOULD MAKE SOMETHING LIKE THAT I WAS SHOULD MAKE SOMETHING LIKE THAT I WAS LIKE, 'DAMN, WE SHOULD MAKE SOMETHING LIKE THAT I WAS LIKE, 'DAMN, WE SHOULD MAKE SOMETHING LIKE THAT I WAS SHOULD MAKE SOMETHING LIKE THAT I WAS LIKE, 'DAMN, WE SHOULD MAKE SOMETHING LIKE THAT I WAS LIKE, 'DAMN, WE SHOULD MAKE SOMETHING LIKE THAT I WAS LIKE, 'DAMN, THAT I WAS SHOULD MAKE SOMETHING LIKE THAT I WAS SHOULD MAKE SOMETHING LIKE THAT I WAS LIKE, 'DAMN, THAT I WAS SHOULD MAKE SOMETHING LIKE THE SOMETHING WITH THAT A. HEALTY WAS LIKE, 'DAMN, THAT I WAS SHOULD MAKE SOMETHING LIKE THE SOMETHING WITH THAT THE DEPONENT THAT I HAND SOME DEVIL? OF "BLURRED LINES" NOR DURING THE PROCESS DID YOU AND PHARRELL DISCUSS IN ANY WAY, SHAPE OR FORM THE	1		1	
1 THAT IF YOU STATED ON THE "OPRAH WINFREY SHOW" 2 THAT MARVIN GAYE INSPIRES HALF OF YOUR MUSIC, THAT 3 IS 4 A. THAT IS A LIE. ABSOLUTELY. 5 Q. OKAY. 6 A. I COULD PLAY 90 PERCENT OF MY 7 SONGS. THEY SOUND NOTHING LIKE OR HAVE ANY 8 CONNECTION TO HIM OR HIS MUSIC. 9 Q. OKAY. 10 ALL RIGHT. LET ME MARK AS THE NEXT 11 EXHIBIT AN INTERVIEW THAT MR. THICKE GAVE TO 12 "G.Q." 13 A. UH-HUH. 14 Q"MAGAZINE." 15 MARK AS THE NEXT EXHIBIT. 16 (WHEREUPON, DEFENDANTS' EXHIBIT NUMBER 17 34 WAS MARKED FOR IDENTIFICATION BY 18 THE DEPONENTS THANK YOU. 20 DEPOSITION OFFICER AND IS ATTACHED 19 HERETO.) 20 DEPOSITION OFFICER: THIS IS 34. 21 (DOCUMENT HANDEOD TO THE DEPONENT.) 22 THE DEPONENT: THANK YOU. 23 OH, WHO'S THAT HANDSOME DEVIL? 24 BY MR. BUSCH: 25 Q. ALL RIGHT. MR. THICKE 26 WE SHOULD MAKE SOMETHING LIKE 27 WE SHOULD MAKE SOMETHING LIKE 28 SHOULD MAKE SOMETHING LIKE 3 THAT, SOMETHING WITH THAT 4 GROOVE: THEN HE STATED 4 GROOVE: THEN HE STATED 5 HAT, SOMETHING WITH THAT 5 HE DEPONENT THANK YOU. 26 OKAY. DID YOU SAY IT IF IT'S NOT 27 OF MY CAREER WAS WRITTEN AND PRODUCED BY SOMEBODY 28 ELSE AND I WAS JEALOUS AND I WANTED SOME OF THE 29 CREDIT. 20 OKAY. DID YOU AND -I BELIEVE YOU 21 ANSWERED THIS GRAPLIER. 22 SO IT IS YOUR TESTIMONY THAT 23 OH, WHO'S THAT HANDSOME DEVIL? 24 BY MR. BUSCH: 25 AND PHARRELL DISCUSS IN ANY WAY, SHAPE OR FORM THE	25	Q. OKAY. SO SO YOU'RE TELLING ME	25	TIMES WAS MARVIN GAYE'S 'GOT TO
1 THAT IF YOU STATED ON THE "OPRAH WINFREY SHOW" 2 THAT MARVIN GAYE INSPIRES HALF OF YOUR MUSIC, THAT 3 IS 4 A. THAT IS A LIE. ABSOLUTELY. 5 Q. OKAY. 6 A. I COULD PLAY 90 PERCENT OF MY 7 SONGS. THEY SOUND NOTHING LIKE OR HAVE ANY 8 CONNECTION TO HIM OR HIS MUSIC. 9 Q. OKAY. 10 ALL RIGHT. LET ME MARK AS THE NEXT 11 EXHIBIT AN INTERVIEW THAT MR. THICKE GAVE TO 12 "G.Q." 13 A. UH-HUH. 14 Q"MAGAZINE." 15 MARK AS THE NEXT EXHIBIT. 16 (WHEREUPON, DEFENDANTS' EXHIBIT NUMBER 17 34 WAS MARKED FOR IDENTIFICATION BY 18 THE DEPONENTS THANK YOU. 20 DEPOSITION OFFICER AND IS ATTACHED 19 HERETO.) 20 DEPOSITION OFFICER: THIS IS 34. 21 (DOCUMENT HANDEOD TO THE DEPONENT.) 22 THE DEPONENT: THANK YOU. 23 OH, WHO'S THAT HANDSOME DEVIL? 24 BY MR. BUSCH: 25 Q. ALL RIGHT. MR. THICKE 26 WE SHOULD MAKE SOMETHING LIKE 27 WE SHOULD MAKE SOMETHING LIKE 28 SHOULD MAKE SOMETHING LIKE 3 THAT, SOMETHING WITH THAT 4 GROOVE: THEN HE STATED 4 GROOVE: THEN HE STATED 5 HAT, SOMETHING WITH THAT 5 HE DEPONENT THANK YOU. 26 OKAY. DID YOU SAY IT IF IT'S NOT 27 OF MY CAREER WAS WRITTEN AND PRODUCED BY SOMEBODY 28 ELSE AND I WAS JEALOUS AND I WANTED SOME OF THE 29 CREDIT. 20 OKAY. DID YOU AND -I BELIEVE YOU 21 ANSWERED THIS GRAPLIER. 22 SO IT IS YOUR TESTIMONY THAT 23 OH, WHO'S THAT HANDSOME DEVIL? 24 BY MR. BUSCH: 25 AND PHARRELL DISCUSS IN ANY WAY, SHAPE OR FORM THE]]			
THAT MARVIN GAYE INSPIRES HALF OF YOUR MUSIC, THAT IS			ļ	76
THAT MARVIN GAYE INSPIRES HALF OF YOUR MUSIC, THAT IS		THAT IS VOLUCEATED ON THE HODD HAVE BEEN ACCOUNT.		****
3 IS 4 A. THAT IS A LIE. ABSOLUTELY. 5 Q. OKAY. 5 PLAYING A LITTLE SOMETHING. WE 6 A. I COULD PLAY 90 PERCENT OF MY 7 SONGS. THEY SOUND NOTHING LIKE OR HAVE ANY 8 CONNECTION TO HIM OR HIS MUSIC. 9 Q. OKAY. 10 ALL RIGHT. LET ME MARK AS THE NEXT 11 EXHIBIT AN INTERVIEW THAT MR. THICKE GAVE TO 12 "G.Q." 13 A. UH-HUH. 14 Q"MAGAZINE." 15 MARK AS THE NEXT EXHIBIT. 16 (WHEREUPON, DEFENDANTS' EXHIBIT NUMBER 17 34 WAS MARKED FOR IDENTIFICATION BY 18 THE DEPOSITION OFFICER AND IS ATTACHED 19 HERETO.) 10 DEPOSITION OFFICER: THIS IS 34. 20 Q. OKAY. 21 (DOCUMENT HANDED TO THE DEPONENT.) 22 THE DEPONENT: THANK YOU. 23 OH, WHO'S THAT HANDSOME DEVIL? 24 BY MR. BUSCH: 25 Q. ALL RIGHT. MR. THICKE 26 AND PHARRELL DISCUSS IN ANY WAY, SHAPE OR FORM THE	Li .		1	
4 A. THAT IS A LIE. ABSOLUTELY. 5 Q. OKAY. 6 A. I COULD PLAY 90 PERCENT OF MY 7 SONGS. THEY SOUND NOTHING LIKE OR HAVE ANY 8 CONNECTION TO HIM OR HIS MUSIC. 9 Q. OKAY. 10 ALL RIGHT. LET ME MARK AS THE NEXT 11 EXHIBIT AN INTERVIEW THAT MR. THICKE GAVE TO 12 "G.Q." 13 A. UH-HUH. 14 Q "MAGAZINE." 15 MARK AS THE NEXT EXHIBIT. 16 (WHEREUPON, DEFENDANTS' EXHIBIT NUMBER 17 34 WAS MARKED FOR IDENTIFICATION BY 18 THE DEPOSITION OFFICER AND IS ATTACHED 19 HERETO.) 20 DEPOSITION OFFICER: THIS IS 34. 21 (DOCUMENT HANDED TO THE DEPONENT.) 22 THE DEPONENT: THANK YOU. 23 DY MR. BUSCH: 24 BY MR. BUSCH: 25 Q. ALL RIGHT. MR. THICKE 4 GROOVE." THEN HE STARTED 5 PLAYING A LITTLE SOMETHING. WE LITERALLY WROTE THE SONG IN 7 ABOUT A HALF HOUR AND RECORDED 1 IT." 9 DO YOU SEE THAT? 1 A. YES, SIR. 1 Q. IS THAT STATEMENT TRUE? 1 A. NO. 1 TRUE? 1 A. BECAUSE AFTER MAKING SIX ALBUMS 1 THUS? 1 A. BECAUSE AFTER MAKING SIX ALBUMS 1 THAT I WROTE AND PRODUCED MYSELF, THE BIGGEST HIT 2 OF MY CAREER WAS WRITTEN AND PRODUCED BY SOMEBODY 2 ELSE AND I WAS JEALOUS AND I WANTED SOME OF THE 2 GREDIT. 2 Q. OKAY. DID YOU AND —I BELIEVE YOU 2 ANSWERED THIS EARLIER. 2 OI TIS YOUR TESTIMONY THAT 2 NEITHER DURING THE — NEITHER BEFORE THE CREATION 2 NEITHER DURING THE — NEITHER BEFORE THE CREATION 2 NEITHER DURING THE — NEITHER BEFORE THE CREATION 2 NEITHER DURING THE — NEITHER BEFORE THE CREATION 2 AND PHARRELL DISCUSS IN ANY WAY, SHAPE OR FORM THE	H	•	1	
5 Q. OKAY. 6 A. I COULD PLAY 90 PERCENT OF MY 7 SONGS. THEY SOUND NOTHING LIKE OR HAVE ANY 8 CONNECTION TO HIM OR HIS MUSIC. 9 Q. OKAY. 10 ALL RIGHT. LET ME MARK AS THE NEXT 11 EXHIBIT AN INTERVIEW THAT MR. THICKE GAVE TO 12 "G.Q." 13 A. UH-HUH. 14 Q "MAGAZINE." 15 MARK AS THE NEXT EXHIBIT. 16 (WHEREUPON, DEFENDANTS' EXHIBIT NUMBER 16 (WHEREUPON, DEFENDANTS' EXHIBIT NUMBER 17 34 WAS MARKED FOR IDENTIFICATION BY 18 THE DEPOSITION OFFICER AND IS ATTACHED 19 HERETO.) 20 DEPOSITION OFFICER THIS IS 34. 21 (DOCUMENT HANDED TO THE DEPONENT.) 22 THE DEPONENT: THANK YOU. 23 OH, WHO'S THAT HANDSOME DEVIL? 24 BY MR. BUSCH: 25 Q. ALL RIGHT. MR. THICKE 25 Q. ALL RIGHT. MR. THICKE 26 PLAYING A LITTLE SOMETHING. WE LITERALLY WROTE THE SONG IN ABOUT A HALF HOUR AND RECORDED 1 IT." 7 ABOUT A HALF HOUR AND RECORDED 1 IT." 7 ABOUT A HALF HOUR AND RECORDED 1 IT." 7 ABOUT A HALF HOUR AND RECORDED 1 IT." 7 ABOUT A HALF HOUR AND RECORDED 1 IT." 7 ABOUT A HALF HOUR AND RECORDED 1 IT." 8 IT." 9 DO YOU SEE THAT? A. YES, SIR. 1 Q. IS THAT STATEMENT TRUE? A. NO. 1 TRUE? A. NO. 1 TRUE? A. NO. 1 TRUE? A. BECAUSE AFTER MAKING SIX ALBUMS 1 THAT I WROTE AND PRODUCED MYSELF, THE BIGGEST HIT 1 OF MY CAREER WAS WRITTEN AND PRODUCED BY SOMEBODY 1 ELSE AND I WAS JEALOUS AND I WANTED SOME OF THE 1 CREDIT. 2 Q. OKAY. DID YOU AND I BELIEVE YOU 2 ANSWERED THIS EARLIER. 2 SO IT IS YOUR TESTIMONY THAT 2 SO IT IS YOUR TESTIMONY THAT 2 NEITHER DURING THE - NEITHER BEFORE THE CREATION 2 OF "BLURRED LINES" NOR DURING THE PROCESS DID YOU 2 AND PHARRELL DISCUSS IN ANY WAY, SHAPE OR FORM THE	11	,-	1 "	THAT, SOMETHING WITH THAT
A. I COULD PLAY 90 PERCENT OF MY SONGS. THEY SOUND NOTHING LIKE OR HAVE ANY CONNECTION TO HIM OR HIS MUSIC. 9 Q. OKAY. 10 ALL RIGHT. LET ME MARK AS THE NEXT 11 EXHIBIT AN INTERVIEW THAT MR. THICKE GAVE TO 12 "G.Q." 13 A. UH-HUH. 14 Q "MAGAZINE." 15 MARK AS THE NEXT EXHIBIT. 16 (WHEREUPON, DEFENDANTS' EXHIBIT NUMBER 17 18 19 HERETO.) 19 CREDIT. 20 DEPOSITION OFFICER: THIS IS 34. 20 Q. OKAY. BY CAREER WAS WRITTEN AND PRODUCED BY SOMEBODY 21 ELSE AND I WAS JEALOUS AND I WANTED SOME OF THE 22 THE DEPONENT: THANK YOU. 23 Q. ALL RIGHT. MR. THICKE 24 BY MR. BUSCH: 25 A. IT:" ABOUT A HALF HOUR AND RECORDED 11 IT:" A BOUT A HALF HOUR AND RECORDED 11 IT." A WOU SEE THAT? A. YES, SIR. Q. IS THAT STATEMENT TRUE? A. NO. 12 A. NO. 13 A. UH-HUH. 13 Q. WHY DID YOU SAY IT IF IT'S NOT 14 TRUE? A. BECAUSE AFTER MAKING SIX ALBUMS 15 THAT I WROTE AND PRODUCED MYSELF, THE BIGGEST HIT 17 OF MY CAREER WAS WRITTEN AND PRODUCED BY SOMEBODY 18 ELSE AND I WAS JEALOUS AND I WANTED SOME OF THE 19 HERETO.) 19 CREDIT. 20 OH, WHO'S THAT HANDSOME DEVIL? 21 ANSWERED THIS EARLIER. 22 SO IT IS YOUR TESTIMONY THAT 23 OH, WHO'S THAT HANDSOME DEVIL? 24 BY MR. BUSCH: 25 Q. ALL RIGHT. MR. THICKE 25 AND PHARRELL DISCUSS IN ANY WAY, SHAPE OR FORM THE	II .		4	GROOVE.' THEN HE STARTED
SONGS. THEY SOUND NOTHING LIKE OR HAVE ANY CONNECTION TO HIM OR HIS MUSIC. 9 Q. OKAY. 10 ALL RIGHT. LET ME MARK AS THE NEXT 11 EXHIBIT AN INTERVIEW THAT MR. THICKE GAVE TO 12 "G.Q." 13 A. UH-HUH. 14 Q "MAGAZINE." 15 MARK AS THE NEXT EXHIBIT. 16 (WHEREUPON, DEFENDANTS' EXHIBIT NUMBER 17 34 WAS MARKED FOR IDENTIFICATION BY 18 THE DEPOSITION OFFICER: THIS IS 34. 19 DO YOU SEE THAT? 10 A. YES, SIR. 11 LIT." 12 A. NO. 13 Q. WHY DID YOU SAY IT IF IT'S NOT 14 TRUE? 15 A. BECAUSE AFTER MAKING SIX ALBUMS 16 (WHEREUPON, DEFENDANTS' EXHIBIT NUMBER 16 (WHEREUPON, DEFENDANTS' EXHIBIT NUMBER 17 34 WAS MARKED FOR IDENTIFICATION BY 18 THE DEPOSITION OFFICER: THIS IS 34. 20 Q. OKAY. DID YOU ANDI BELIEVE YOU 21 (DOCUMENT HANDED TO THE DEPONENT.) 22 THE DEPONENT: THANK YOU. 23 OH, WHO'S THAT HANDSOME DEVIL? 24 BY MR. BUSCH: 25 Q. ALL RIGHT. MR. THICKE 26 AND PHARRELL DISCUSS IN ANY WAY, SHAPE OR FORM THE	fl	Q. OKAY.	5	PLAYING A LITTLE SOMETHING. WE
8 CONNECTION TO HIM OR HIS MUSIC. 9 Q. OKAY. 10 ALL RIGHT. LET ME MARK AS THE NEXT 11 EXHIBIT AN INTERVIEW THAT MR. THICKE GAVE TO 12 A. NO. 13 A. UH-HUH. 14 Q "MAGAZINE." 15 MARK AS THE NEXT EXHIBIT. 16 (WHEREUPON, DEFENDANTS' EXHIBIT NUMBER 16 (WHEREUPON, DEFENDANTS' EXHIBIT NUMBER 17 34 WAS MARKED FOR IDENTIFICATION BY 18 THE DEPOSITION OFFICER AND IS ATTACHED 19 HERETO.) 20 DEPOSITION OFFICER: THIS IS 34. 21 (DOCUMENT HANDED TO THE DEPONENT.) 22 THE DEPONENT: THANK YOU. 23 OH, WHO'S THAT HANDSOME DEVIL? 24 BY MR. BUSCH: 25 AND PHARRELL DISCUSS IN ANY WAY, SHAPE OR FORM THE	6	A. I COULD PLAY 90 PERCENT OF MY	6	LITERALLY WROTE THE SONG IN
9 DO YOU SEE THAT? 10 ALL RIGHT. LET ME MARK AS THE NEXT 11 EXHIBIT AN INTERVIEW THAT MR. THICKE GAVE TO 12 "G.Q." 13 A. UH-HUH. 14 Q "MAGAZINE." 15 MARK AS THE NEXT EXHIBIT. 16 (WHEREUPON, DEFENDANTS' EXHIBIT NUMBER 17 34 WAS MARKED FOR IDENTIFICATION BY 18 THE DEPOSITION OFFICER AND IS ATTACHED 19 HERETO.) 20 DEPOSITION OFFICER: THIS IS 34. 21 (DOCUMENT HANDED TO THE DEPONENT.) 22 THE DEPONENT: THANK YOU. 23 OH, WHO'S THAT HANDSOME DEVIL? 24 BY MR. BUSCH: 25 Q. ALL RIGHT. MR. THICKE 26 DO YOU SEE THAT? 27 A. YES, SIR. 28 WES, SIR. 29 Q. IS THAT STATEMENT TRUE? 20 A. NO. 21 WHY DID YOU SAY IT IF IT'S NOT 21 TRUE? 21 A. NO. 22 THE DEPOSITION OFFICER AND IS ATTACHED 23 OH, WHO'S THAT HANDSOME DEVIL? 24 BY MR. BUSCH: 25 Q. ALL RIGHT. MR. THICKE 26 DO YOU SEE THAT? 29 DO YOU SEE THAT? 20 A. YES, SIR. 20 Q. WHY DID YOU SAY IT IF IT'S NOT 21 TRUE? 22 THE DEPOSITION OFFICER AND IS ATTACHED 23 NEITHER DAY IN AN EVER E THAT STATEMENT TRUE? 24 BY MR. BUSCH: 25 AND PHARRELL DISCUSS IN ANY WAY, SHAPE OR FORM THE	7	SONGS. THEY SOUND NOTHING LIKE OR HAVE ANY	7	ABOUT A HALF HOUR AND RECORDED
ALL RIGHT. LET ME MARK AS THE NEXT 11 EXHIBIT AN INTERVIEW THAT MR. THICKE GAVE TO 12 "G.Q." 13 A. UH-HUH. 14 Q "MAGAZINE." 15 MARK AS THE NEXT EXHIBIT. 16 (WHEREUPON, DEFENDANTS' EXHIBIT NUMBER 17 34 WAS MARKED FOR IDENTIFICATION BY 18 THE DEPOSITION OFFICER AND IS ATTACHED 19 HERETO.) 20 DEPOSITION OFFICER: THIS IS 34. 21 (DOCUMENT HANDED TO THE DEPONENT.) 22 THE DEPONENT: THANK YOU. 23 OH, WHO'S THAT HANDSOME DEVIL? 24 BY MR. BUSCH: 25 Q. ALL RIGHT. MR. THICKE 10 A. YES, SIR. 11 Q. IS THAT STATEMENT TRUE? 12 A. NO. 13 Q. WHY DID YOU SAY IT IF IT'S NOT 14 TRUE? 15 A. BECAUSE AFTER MAKING SIX ALBUMS 16 THAT I WROTE AND PRODUCED MYSELF, THE BIGGEST HIT 17 OF MY CAREER WAS WRITTEN AND PRODUCED BY SOMEBODY 18 ELSE AND I WAS JEALOUS AND I WANTED SOME OF THE 19 CREDIT. 20 Q. OKAY. DID YOU ANDI BELIEVE YOU 21 ANSWERED THIS EARLIER. 22 SO IT IS YOUR TESTIMONY THAT 23 NEITHER DURING THE NEITHER BEFORE THE CREATION 24 BY MR. BUSCH: 25 AND PHARRELL DISCUSS IN ANY WAY, SHAPE OR FORM THE	8	CONNECTION TO HIM OR HIS MUSIC.	8	IT."
10 ALL RIGHT. LET ME MARK AS THE NEXT 11 EXHIBIT AN INTERVIEW THAT MR. THICKE GAVE TO 12 "G.Q." 13 A. UH-HUH. 14 Q"MAGAZINE." 15 MARK AS THE NEXT EXHIBIT. 16 (WHEREUPON, DEFENDANTS' EXHIBIT NUMBER 16 (WHEREUPON, DEFENDANTS' EXHIBIT NUMBER 17 34 WAS MARKED FOR IDENTIFICATION BY 18 THE DEPOSITION OFFICER AND IS ATTACHED 19 HERETO.) 20 DEPOSITION OFFICER: THIS IS 34. 21 (DOCUMENT HANDED TO THE DEPONENT.) 22 THE DEPONENT: THANK YOU. 23 OH, WHO'S THAT HANDSOME DEVIL? 24 BY MR. BUSCH: 25 Q. ALL RIGHT. MR. THICKE 10 A. YES, SIR. 11 Q. IS THAT STATEMENT TRUE? 12 A. NO. 13 Q. WHY DID YOU SAY IT IF IT'S NOT 14 TRUE? 15 A. BECAUSE AFTER MAKING SIX ALBUMS 16 THAT I WROTE AND PRODUCED MYSELF, THE BIGGEST HIT 17 OF MY CAREER WAS WRITTEN AND PRODUCED BY SOMEBODY 18 ELSE AND I WAS JEALOUS AND I WANTED SOME OF THE 19 CREDIT. 20 Q. OKAY. DID YOU ANDI BELIEVE YOU 21 ANSWERED THIS EARLIER. 22 SO IT IS YOUR TESTIMONY THAT 23 NEITHER DURING THE NEITHER BEFORE THE CREATION 24 BY MR. BUSCH: 25 AND PHARRELL DISCUSS IN ANY WAY, SHAPE OR FORM THE	9	Q. OKAY.	9	DO YOU SEE THAT?
11 EXHIBIT AN INTERVIEW THAT MR. THICKE GAVE TO 12 "G.Q." 13 A. UH-HUH. 14 Q "MAGAZINE." 15 MARK AS THE NEXT EXHIBIT. 16 (WHEREUPON, DEFENDANTS' EXHIBIT NUMBER 17 34 WAS MARKED FOR IDENTIFICATION BY 18 THE DEPOSITION OFFICER AND IS ATTACHED 19 HERETO.) 20 DEPOSITION OFFICER: THIS IS 34. 21 (DOCUMENT HANDED TO THE DEPONENT.) 22 THE DEPONENT: THANK YOU. 23 OH, WHO'S THAT HANDSOME DEVIL? 24 BY MR. BUSCH: 25 Q. ALL RIGHT. MR. THICKE 16 Q. IS THAT STATEMENT TRUE? 12 A. NO. 13 Q. WHY DID YOU SAY IT IF IT'S NOT 14 TRUE? 15 A. BECAUSE AFTER MAKING SIX ALBUMS 16 THAT I WROTE AND PRODUCED MYSELF, THE BIGGEST HIT 17 OF MY CAREER WAS WRITTEN AND PRODUCED BY SOMEBODY 18 ELSE AND I WAS JEALOUS AND I WANTED SOME OF THE 19 GREDIT. 20 Q. OKAY. DID YOU AND I BELIEVE YOU 21 ANSWERED THIS EARLIER. 22 SO IT IS YOUR TESTIMONY THAT 23 NEITHER DURING THE NEITHER BEFORE THE CREATION 24 BY MR. BUSCH: 25 Q. ALL RIGHT. MR. THICKE 26 SO IT BLURRED LINES" NOR DURING THE PROCESS DID YOU 27 AND PHARRELL DISCUSS IN ANY WAY, SHAPE OR FORM THE	10	ALL RIGHT. LET ME MARK AS THE NEXT	10	
12 "G.Q." 13 A. UH-HUH. 14 Q "MAGAZINE." 15 MARK AS THE NEXT EXHIBIT. 16 (WHEREUPON, DEFENDANTS' EXHIBIT NUMBER 17 34 WAS MARKED FOR IDENTIFICATION BY 18 THE DEPOSITION OFFICER AND IS ATTACHED 19 HERETO.) 20 DEPOSITION OFFICER: THIS IS 34. 21 (DOCUMENT HANDED TO THE DEPONENT.) 22 THE DEPONENT: THANK YOU. 23 OH, WHO'S THAT HANDSOME DEVIL? 24 BY MR. BUSCH: 25 Q. ALL RIGHT. MR. THICKE 12 A. NO. 13 Q. WHY DID YOU SAY IT IF IT'S NOT 14 TRUE? 15 A. BECAUSE AFTER MAKING SIX ALBUMS 16 THAT I WROTE AND PRODUCED MYSELF, THE BIGGEST HIT 17 OF MY CAREER WAS WRITTEN AND PRODUCED BY SOMEBODY 18 ELSE AND I WAS JEALOUS AND I WANTED SOME OF THE 19 GREDIT. 20 Q. OKAY. DID YOU AND I BELIEVE YOU 21 ANSWERED THIS EARLIER. 22 SO IT IS YOUR TESTIMONY THAT 23 NEITHER DURING THE NEITHER BEFORE THE CREATION 24 BY MR. BUSCH: 25 AND PHARRELL DISCUSS IN ANY WAY, SHAPE OR FORM THE	11		}	· · · · · · · · · · · · · · · · · · ·
A. UH-HUH. Q "MAGAZINE." MARK AS THE NEXT EXHIBIT. (WHEREUPON, DEFENDANTS' EXHIBIT NUMBER WAS MARKED FOR IDENTIFICATION BY THE DEPOSITION OFFICER AND IS ATTACHED HERETO.) DEPOSITION OFFICER: THIS IS 34. (DOCUMENT HANDED TO THE DEPONENT.) THE DEPONENT: THANK YOU. MY DID YOU SAY IT IF IT'S NOT TRUE? A. BECAUSE AFTER MAKING SIX ALBUMS THAT I WROTE AND PRODUCED MYSELF, THE BIGGEST HIT OF MY CAREER WAS WRITTEN AND PRODUCED BY SOMEBODY BELSE AND I WAS JEALOUS AND I WANTED SOME OF THE CREDIT. Q. OKAY. DID YOU AND I BELIEVE YOU ANSWERED THIS EARLIER. THE DEPONENT: THANK YOU. DHY O'S THAT HANDSOME DEVIL? WHY DID YOU SAY IT IF IT'S NOT A. BECAUSE AFTER MAKING SIX ALBUMS THAT I WROTE AND PRODUCED MYSELF, THE BIGGEST HIT OF MY CAREER WAS WRITTEN AND PRODUCED BY SOMEBODY AND YEAR AND PACKET WAS WRITTEN AND PRODUCED BY SOMEBODY AND PHARRELL DISCUSS IN ANY WAY, SHAPE OR FORM THE A. BECAUSE AFTER MAKING SIX ALBUMS THAT I WROTE AND PRODUCED MYSELF, THE BIGGEST HIT A. BECAUSE AFTER MAKING SIX ALBUMS THAT I WROTE AND PRODUCED MYSELF, THE BIGGEST HIT A. BECAUSE AFTER MAKING SIX ALBUMS THAT I WROTE AND PRODUCED MYSELF, THE BIGGEST HIT THAT I WROTE AND PRODUCED MYSELF, THE BIGGEST HIT A. BECAUSE AFTER MAKING SIX ALBUMS THAT I WROTE AND PRODUCED MYSELF, THE BIGGEST HIT A. BECAUSE AFTER MAKING SIX ALBUMS THAT I WROTE AND PRODUCED MYSELF, THE BIGGEST HIT A. BECAUSE AFTER MAKING SIX ALBUMS THAT I WROTE AND PRODUCED MYSELF, THE BIGGEST HIT THAT I WROTE AND PRODUCED MYSELF, THE BIGGEST HIT A. BECAUSE AFTER MAKING SIX ALBUMS THAT I WROTE AND PRODUCED MYSELF, THE BIGGEST HIT A. BECAUSE AFTER MAKING SIX ALBUMS THAT I WROTE AND PRODUCED MYSELF, THE BIGGEST HIT THAT I WROTE AND PRODUCED MYSELF, THE BIGGEST HIT THAT I WROTE AND PRODUCED MYSELF, THE BIGGEST HIT A. BECAUSE AFTER MAKING SIX ALBUMS THAT I WROTE AND PRODUCED MYSELF, THE BIGGEST HIT A. BECAUSE AFTER MAKING SIX ALBUMS THAT I WROTE AND PRODUCED MYSELF, THE BIGGEST HIT THAT I WROTE AND PRODUCED MYSELF, THE BIGGEST HIT THAT I WRO	ii .		1	
14 TRUE? 15 MARK AS THE NEXT EXHIBIT. 16 (WHEREUPON, DEFENDANTS' EXHIBIT NUMBER 17 34 WAS MARKED FOR IDENTIFICATION BY 18 THE DEPOSITION OFFICER AND IS ATTACHED 19 HERETO.) 20 DEPOSITION OFFICER: THIS IS 34. 21 (DOCUMENT HANDED TO THE DEPONENT.) 22 THE DEPONENT: THANK YOU. 23 OH, WHO'S THAT HANDSOME DEVIL? 24 BY MR. BUSCH: 25 Q. ALL RIGHT. MR. THICKE — 14 TRUE? 15 A. BECAUSE AFTER MAKING SIX ALBUMS 16 THAT I WROTE AND PRODUCED MYSELF, THE BIGGEST HIT 17 OF MY CAREER WAS WRITTEN AND PRODUCED BY SOMEBODY 18 ELSE AND I WAS JEALOUS AND I WANTED SOME OF THE 19 CREDIT. 20 Q. OKAY. DID YOU AND —I BELIEVE YOU 21 ANSWERED THIS EARLIER. 22 SO IT IS YOUR TESTIMONY THAT 23 NEITHER DURING THE — NEITHER BEFORE THE CREATION 24 BY MR. BUSCH: 25 AND PHARRELL DISCUSS IN ANY WAY, SHAPE OR FORM THE	ll .	A. UH-HUH.	1	
MARK AS THE NEXT EXHIBIT. (WHEREUPON, DEFENDANTS' EXHIBIT NUMBER 17 34 WAS MARKED FOR IDENTIFICATION BY 18 THE DEPOSITION OFFICER AND IS ATTACHED 19 HERETO.) 10 DEPOSITION OFFICER: THIS IS 34. 21 (DOCUMENT HANDED TO THE DEPONENT.) 22 THE DEPONENT: THANK YOU. 23 OH, WHO'S THAT HANDSOME DEVIL? 24 BY MR. BUSCH: 25 Q. ALL RIGHT. MR. THICKE 15 A. BECAUSE AFTER MAKING SIX ALBUMS 16 THAT I WROTE AND PRODUCED MYSELF, THE BIGGEST HIT 17 OF MY CAREER WAS WRITTEN AND PRODUCED BY SOMEBODY 18 ELSE AND I WAS JEALOUS AND I WANTED SOME OF THE 19 CREDIT. 20 Q. OKAY. DID YOU AND I BELIEVE YOU 21 ANSWERED THIS EARLIER. 22 SO IT IS YOUR TESTIMONY THAT 23 NEITHER DURING THE NEITHER BEFORE THE CREATION 24 BY MR. BUSCH: 25 AND PHARRELL DISCUSS IN ANY WAY, SHAPE OR FORM THE	il		1	
16 (WHEREUPON, DEFENDANTS' EXHIBIT NUMBER 17 34 WAS MARKED FOR IDENTIFICATION BY 18 THE DEPOSITION OFFICER AND IS ATTACHED 19 HERETO.) 20 DEPOSITION OFFICER: THIS IS 34. 21 (DOCUMENT HANDED TO THE DEPONENT.) 22 THE DEPONENT: THANK YOU. 23 OH, WHO'S THAT HANDSOME DEVIL? 24 BY MR. BUSCH: 25 Q. ALL RIGHT. MR. THICKE 16 THAT I WROTE AND PRODUCED MYSELF, THE BIGGEST HIT 17 OF MY CAREER WAS WRITTEN AND PRODUCED BY SOMEBODY 18 ELSE AND I WAS JEALOUS AND I WANTED SOME OF THE 29 CREDIT. 20 Q. OKAY. DID YOU AND I BELIEVE YOU 21 ANSWERED THIS EARLIER. 22 SO IT IS YOUR TESTIMONY THAT 23 NEITHER DURING THE NEITHER BEFORE THE CREATION 24 BY MR. BUSCH: 25 AND PHARRELL DISCUSS IN ANY WAY, SHAPE OR FORM THE	11		{	
17 34 WAS MARKED FOR IDENTIFICATION BY 18 THE DEPOSITION OFFICER AND IS ATTACHED 19 HERETO.) 20 DEPOSITION OFFICER: THIS IS 34. 21 (DOCUMENT HANDED TO THE DEPONENT.) 22 THE DEPONENT: THANK YOU, 23 OH, WHO'S THAT HANDSOME DEVIL? 24 BY MR. BUSCH: 25 Q. ALL RIGHT. MR. THICKE 26 OF MY CAREER WAS WRITTEN AND PRODUCED BY SOMEBODY 18 ELSE AND I WAS JEALOUS AND I WANTED SOME OF THE 29 CREDIT. 20 Q. OKAY. DID YOU AND I BELIEVE YOU 21 ANSWERED THIS EARLIER. 22 SO IT IS YOUR TESTIMONY THAT 23 NEITHER DURING THE NEITHER BEFORE THE CREATION 24 OF "BLURRED LINES" NOR DURING THE PROCESS DID YOU 25 AND PHARRELL DISCUSS IN ANY WAY, SHAPE OR FORM THE	H			
18 THE DEPOSITION OFFICER AND IS ATTACHED 19 HERETO.) 20 DEPOSITION OFFICER: THIS IS 34. 21 (DOCUMENT HANDED TO THE DEPONENT.) 22 THE DEPONENT: THANK YOU, 23 OH, WHO'S THAT HANDSOME DEVIL? 24 BY MR. BUSCH: 25 Q. ALL RIGHT. MR. THICKE 28 THE DEPOSITION OFFICER: THIS IS 34. 29 Q. OKAY. DID YOU AND I BELIEVE YOU 21 ANSWERED THIS EARLIER. 22 SO IT IS YOUR TESTIMONY THAT 23 NEITHER DURING THE NEITHER BEFORE THE CREATION 24 OF "BLURRED LINES" NOR DURING THE PROCESS DID YOU 25 AND PHARRELL DISCUSS IN ANY WAY, SHAPE OR FORM THE	il .		}	•
19 HERETO.) 20 DEPOSITION OFFICER: THIS IS 34. 21 (DOCUMENT HANDED TO THE DEPONENT.) 22 THE DEPONENT: THANK YOU. 23 OH, WHO'S THAT HANDSOME DEVIL? 24 BY MR. BUSCH: 25 Q. ALL RIGHT. MR. THICKE 29 CREDIT. 20 Q. OKAY. DID YOU AND I BELIEVE YOU 21 ANSWERED THIS EARLIER. 22 SO IT IS YOUR TESTIMONY THAT 23 NEITHER DURING THE NEITHER BEFORE THE CREATION 24 OF "BLURRED LINES" NOR DURING THE PROCESS DID YOU 25 AND PHARRELL DISCUSS IN ANY WAY, SHAPE OR FORM THE	ll .		1	
20 DEPOSITION OFFICER: THIS IS 34. 21 (DOCUMENT HANDED TO THE DEPONENT.) 22 THE DEPONENT: THANK YOU. 23 OH, WHO'S THAT HANDSOME DEVIL? 24 BY MR. BUSCH: 25 Q. ALL RIGHT. MR. THICKE 20 Q. OKAY. DID YOU AND I BELIEVE YOU 21 ANSWERED THIS EARLIER. 22 SO IT IS YOUR TESTIMONY THAT 23 NEITHER DURING THE NEITHER BEFORE THE CREATION 24 OF "BLURRED LINES" NOR DURING THE PROCESS DID YOU 25 AND PHARRELL DISCUSS IN ANY WAY, SHAPE OR FORM THE	il .			
21 (DOCUMENT HANDED TO THE DEPONENT.) 22 THE DEPONENT: THANK YOU. 23 OH, WHO'S THAT HANDSOME DEVIL? 24 BY MR. BUSCH: 25 Q. ALL RIGHT. MR. THICKE 21 ANSWERED THIS EARLIER. 22 SO IT IS YOUR TESTIMONY THAT 23 NEITHER DURING THE NEITHER BEFORE THE CREATION 24 OF "BLURRED LINES" NOR DURING THE PROCESS DID YOU 25 AND PHARRELL DISCUSS IN ANY WAY, SHAPE OR FORM THE	El .	•	1	
22 THE DEPONENT: THANK YOU. 23 OH, WHO'S THAT HANDSOME DEVIL? 24 BY MR. BUSCH: 25 Q. ALL RIGHT. MR. THICKE 26 SO IT IS YOUR TESTIMONY THAT 27 NEITHER DURING THE NEITHER BEFORE THE CREATION 28 OF "BLURRED LINES" NOR DURING THE PROCESS DID YOU 29 AND PHARRELL DISCUSS IN ANY WAY, SHAPE OR FORM THE	ii .			
23 OH, WHO'S THAT HANDSOME DEVIL? 24 BY MR. BUSCH: 25 Q. ALL RIGHT. MR. THICKE 27 Q. ALL RIGHT. MR. THICKE 28 NEITHER DURING THE NEITHER BEFORE THE CREATION 29 OF "BLURRED LINES" NOR DURING THE PROCESS DID YOU 20 AND PHARRELL DISCUSS IN ANY WAY, SHAPE OR FORM THE	tl.	•	21	
24 BY MR. BUSCH: 25 Q. ALL RIGHT. MR. THICKE 25 AND PHARRELL DISCUSS IN ANY WAY, SHAPE OR FORM THE	22	THE DEPONENT: THANK YOU,	22	SO IT IS YOUR TESTIMONY THAT
25 Q. ALL RIGHT. MR. THICKE 25 AND PHARRELL DISCUSS IN ANY WAY, SHAPE OR FORM THE	23	OH, WHO'S THAT HANDSOME DEVIL?	23	NEITHER DURING THE NEITHER BEFORE THE CREATION
	24	BY MR. BUSCH:	24	OF "BLURRED LINES" NOR DURING THE PROCESS DID YOU
	25	Q. ALL RIGHT, MR. THICKE	25	AND PHARRELL DISCUSS IN ANY WAY, SHAPE OR FORM THE
75				,
	L	75		77



Kelli Norden and Associates Court Reporters 310.820.7733 phone 310.820.7933 Fax 1835 W. Olympic Boulevard Suite 680E Los Angeles, California 90064 kna@kellinorden.com

Case 2:13-cv-06004-JAK-AGR Document 122 Filed 09/15/14 Page 74 of 125 Page ID #:2643

CONFIDENTIAL DEPOSITION OF ROBIN THICKE

		1	
1	SONG "GOT TO GIVE IT UP"?	1	A. I WALKED IN UPON IT.
2	A. NO.	2	Q. UPON IT BEING STARTED?
3	Q. IT IS CORRECT? WHAT I JUST SAID IS	3	A. YES. IN ITS IN ITS SKELETAL
4	CORRECT?	4	FORM, I WALKED IN AND HE STARTED SINGING ME SOME
5	A. YES, WHAT YOU SAID IS CORRECT, THAT	5	IDEAS HE HAD AND THE SONG HAPPENED VERY QUICKLY.
6	HIM AND I DID NOT DISCUSS IT. I TRIED TO TAKE	6	JUMPED RIGHT INTO THE BOOTH AND STARTED
7	CREDIT FOR IT LATER BECAUSE HE WROTE THE WHOLE	7	SINGING WHATEVER HE SAID.
8	THING PRETTY MUCH BY HIMSELF AND I WAS ENVIOUS OF	8	Q. OKAY, AND SO THERE WAS ACTUALLY NO
		1	
9	THAT.	9	DISCUSSION OF MARVIN GAYE AT ALL?
10	Q. OKAY.	10	A. NO.
11	MR. KING: AND WHEN YOU'RE DONE	11	Q. OKAY. IN FACT, YOU DIDN'T OFFER
12	WITH THIS EXHIBIT, HIS FOOD IS HERE, SO	12	HIM ANY IDEAS OR THOUGHTS OR ANYTHING THAT YOU HAD
13	THE DEPONENT: IS IT IS IT	13	WITH RESPECT TO "BLURRED LINES"?
14	ALLOWED TO BE BROUGHT IN?	14	A. NO.
15	MR. KING: NO.	15	Q. OKAY. "NO," MEANING WHAT I SAID IS
16	THE DEPONENT: NO. OKAY.	16	CORRECT?
17	MR. KING: NO.	17	A. YES, WHAT YOU SAID IS CORRECT. I
18	THE DEPONENT: THANK YOU, NO	18	OFFERED NO IDEAS TO CONNECT TO ANYTHING TO MARVIN
19	PROBLEM, WE'LL WAIT, WE'LL WAIT UNTIL HE'S	19	GAYE.
20	FINISHED.	20	Q. YOU DIDN'T OFFER ANY IDEAS AT ALL;
21	BY MR. BUSCH:	21	RIGHT?
22	Q. WHAT STUDIO WAS "BLURRED LINES"	22	A. NO, NOT REALLY.
23	RECORDED AT?	23	Q. OKAY.
24	A. I DO NOT RECALL THE NAME OF IT.	24	A. I WISH I COULD TAKE THE CREDIT FOR
25	MAYBE GLENWOOD. IS THAT COULD THAT BE CORRECT?		
25	MAT DE GEERWOOD. 13 MAI - COOLD MAI DE CONNECT	25	IT. BUT MY NEW ALBUM'S GREAT. WAIT TILL YOU HEAR
	78		80
		1	
1	GLENWOOD STUDIOS?	1	THAT ONE.
2	Q. OKAY. WERE YOU PRESENT DURING THE	2	MR. KING: RICHARD, WOULD THIS BE A
2 3	Q. OKAY. WERE YOU PRESENT DURING THE CREATION OF "BLURRED LINES"?	2 3	MR. KING: RICHARD, WOULD THIS BE A GOOD TIME FOR HIM TO EAT HIS LUNCH?
2 3 4	Q. OKAY. WERE YOU PRESENT DURING THE CREATION OF "BLURRED LINES"? A. I WAS PRESENT. OBVIOUSLY, I SANG	2 3 4	MR. KING: RICHARD, WOULD THIS BE A GOOD TIME FOR HIM TO EAT HIS LUNCH? MR. BUSCH: NO, LET LET ME GET
2 3	Q. OKAY. WERE YOU PRESENT DURING THE CREATION OF "BLURRED LINES"?	2 3 4 5	MR. KING: RICHARD, WOULD THIS BE A GOOD TIME FOR HIM TO EAT HIS LUNCH?
2 3 4	Q. OKAY. WERE YOU PRESENT DURING THE CREATION OF "BLURRED LINES"? A. I WAS PRESENT. OBVIOUSLY, I SANG	2 3 4	MR. KING: RICHARD, WOULD THIS BE A GOOD TIME FOR HIM TO EAT HIS LUNCH? MR. BUSCH: NO, LET LET ME GET
2 3 4 5	Q. OKAY. WERE YOU PRESENT DURING THE CREATION OF "BLURRED LINES"? A. I WAS PRESENT. OBVIOUSLY, I SANG IT. I HAD TO BE THERE.	2 3 4 5	MR. KING: RICHARD, WOULD THIS BE A GOOD TIME FOR HIM TO EAT HIS LUNCH? MR. BUSCH: NO, LET – LET ME GET THROUGH A COUPLE THINGS HERE.
2 3 4 5 6	Q. OKAY. WERE YOU PRESENT DURING THE CREATION OF "BLURRED LINES"? A. I WAS PRESENT. OBVIOUSLY, I SANG IT. I HAD TO BE THERE. Q. WHEN THE WHEN THE RYTHYM TRACK	2 3 4 5 6	MR. KING: RICHARD, WOULD THIS BE A GOOD TIME FOR HIM TO EAT HIS LUNCH? MR. BUSCH: NO, LET – LET ME GET THROUGH A COUPLE THINGS HERE. THE DEPONENT: OKAY, BUDDY.
2 3 4 5 6 7	Q. OKAY. WERE YOU PRESENT DURING THE CREATION OF "BLURRED LINES"? A. I WAS PRESENT. OBVIOUSLY, I SANG IT. I HAD TO BE THERE. Q. WHEN THE — WHEN THE RYTHYM TRACK WAS BEING CREATED, WERE YOU THERE WITH PHARRELL?	2 3 4 5 6 7	MR. KING: RICHARD, WOULD THIS BE A GOOD TIME FOR HIM TO EAT HIS LUNCH? MR. BUSCH: NO, LET – LET ME GET THROUGH A COUPLE THINGS HERE. THE DEPONENT: OKAY, BUDDY. MR. BUSCH: THEN WE CAN.
2 3 4 5 6 7 8	Q. OKAY. WERE YOU PRESENT DURING THE CREATION OF "BLURRED LINES"? A. I WAS PRESENT. OBVIOUSLY, I SANG IT. I HAD TO BE THERE. Q. WHEN THE — WHEN THE RYTHYM TRACK WAS BEING CREATED, WERE YOU THERE WITH PHARRELL? A. TO BE HONEST, THAT'S THE ONLY	2 3 4 5 6 7 8	MR. KING: RICHARD, WOULD THIS BE A GOOD TIME FOR HIM TO EAT HIS LUNCH? MR. BUSCH: NO, LET – LET ME GET THROUGH A COUPLE THINGS HERE. THE DEPONENT: OKAY, BUDDY. MR. BUSCH: THEN WE CAN. MR. KING: I CAN HEAR YOUR LAWYER
2 3 4 5 6 7 8 9	Q. OKAY. WERE YOU PRESENT DURING THE CREATION OF "BLURRED LINES"? A. I WAS PRESENT. OBVIOUSLY, I SANG IT. I HAD TO BE THERE. Q. WHEN THE — WHEN THE RYTHYM TRACK WAS BEING CREATED, WERE YOU THERE WITH PHARRELL? A. TO BE HONEST, THAT'S THE ONLY PART WHERE — I WAS HIGH ON VICODIN AND ALCOHOL	2 3 4 5 6 7 8 9	MR. KING: RICHARD, WOULD THIS BE A GOOD TIME FOR HIM TO EAT HIS LUNCH? MR. BUSCH: NO, LET – LET ME GET THROUGH A COUPLE THINGS HERE. THE DEPONENT: OKAY, BUDDY. MR. BUSCH: THEN WE CAN. MR. KING: I CAN HEAR YOUR LAWYER WORKING IN THE NEXT ROOM.
2 3 4 5 6 7 8 9	Q. OKAY. WERE YOU PRESENT DURING THE CREATION OF "BLURRED LINES"? A. I WAS PRESENT. OBVIOUSLY, I SANG IT. I HAD TO BE THERE. Q. WHEN THE — WHEN THE RYTHYM TRACK WAS BEING CREATED, WERE YOU THERE WITH PHARRELL? A. TO BE HONEST, THAT'S THE ONLY PART WHERE — I WAS HIGH ON VICODIN AND ALCOHOL WHEN I SHOWED UP AT THE STUDIO.	2 3 4 5 6 7 8 9 10	MR. KING: RICHARD, WOULD THIS BE A GOOD TIME FOR HIM TO EAT HIS LUNCH? MR. BUSCH: NO, LET – LET ME GET THROUGH A COUPLE THINGS HERE. THE DEPONENT: OKAY, BUDDY. MR. BUSCH: THEN WE CAN. MR. KING: I CAN HEAR YOUR LAWYER WORKING IN THE NEXT ROOM. THE DEPONENT: YEAH.
2 3 4 5 6 7 8 9 10	Q. OKAY. WERE YOU PRESENT DURING THE CREATION OF "BLURRED LINES"? A. I WAS PRESENT. OBVIOUSLY, I SANG IT. I HAD TO BE THERE. Q. WHEN THE WHEN THE RYTHYM TRACK WAS BEING CREATED, WERE YOU THERE WITH PHARRELL? A. TO BE HONEST, THAT'S THE ONLY PART WHERE I WAS HIGH ON VICODIN AND ALCOHOL WHEN I SHOWED UP AT THE STUDIO. SO MY RECOLLECTION IS WHEN WE MADE	2 3 4 5 6 7 8 9 10	MR. KING: RICHARD, WOULD THIS BE A GOOD TIME FOR HIM TO EAT HIS LUNCH? MR. BUSCH: NO, LET – LET ME GET THROUGH A COUPLE THINGS HERE. THE DEPONENT: OKAY, BUDDY. MR. BUSCH: THEN WE CAN. MR. KING: I CAN HEAR YOUR LAWYER WORKING IN THE NEXT ROOM. THE DEPONENT: YEAH. THE VIDEOGRAPHER: MICROPHONE, SIR. BY MR. BUSCH:
2 3 4 5 6 7 8 9 10 11	Q. OKAY. WERE YOU PRESENT DURING THE CREATION OF "BLURRED LINES"? A. I WAS PRESENT. OBVIOUSLY, I SANG IT. I HAD TO BE THERE. Q. WHEN THE — WHEN THE RYTHYM TRACK WAS BEING CREATED, WERE YOU THERE WITH PHARRELL? A. TO BE HONEST, THAT'S THE ONLY PART WHERE — I WAS HIGH ON VICODIN AND ALCOHOL WHEN I SHOWED UP AT THE STUDIO. SO MY RECOLLECTION IS WHEN WE MADE THE SONG, I THOUGHT I WANTED — I — I WANTED TO BE MORE INVOLVED THAN I ACTUALLY WAS BY THE TIME,	2 3 4 5 6 7 8 9 10 11	MR. KING: RICHARD, WOULD THIS BE A GOOD TIME FOR HIM TO EAT HIS LUNCH? MR. BUSCH: NO, LET – LET ME GET THROUGH A COUPLE THINGS HERE. THE DEPONENT: OKAY, BUDDY. MR. BUSCH: THEN WE CAN. MR. KING: I CAN HEAR YOUR LAWYER WORKING IN THE NEXT ROOM. THE DEPONENT: YEAH. THE VIDEOGRAPHER: MICROPHONE, SIR.
2 3 4 5 6 7 8 9 10 11 12 13 14	Q. OKAY. WERE YOU PRESENT DURING THE CREATION OF "BLURRED LINES"? A. I WAS PRESENT. OBVIOUSLY, I SANG IT. I HAD TO BE THERE. Q. WHEN THE — WHEN THE RYTHYM TRACK WAS BEING CREATED, WERE YOU THERE WITH PHARRELL? A. TO BE HONEST, THAT'S THE ONLY PART WHERE — I WAS HIGH ON VICODIN AND ALCOHOL WHEN I SHOWED UP AT THE STUDIO. SO MY RECOLLECTION IS WHEN WE MADE THE SONG, I THOUGHT I WANTED — I — I WANTED TO BE MORE INVOLVED THAN I ACTUALLY WAS BY THE TIME, NINE MONTHS LATER, IT BECAME A HUGE HIT AND I	2 3 4 5 6 7 8 9 10 11 12 13 14	MR. KING: RICHARD, WOULD THIS BE A GOOD TIME FOR HIM TO EAT HIS LUNCH? MR. BUSCH: NO, LET – LET ME GET THROUGH A COUPLE THINGS HERE. THE DEPONENT: OKAY, BUDDY. MR. BUSCH: THEN WE CAN. MR. KING: I CAN HEAR YOUR LAWYER WORKING IN THE NEXT ROOM. THE DEPONENT: YEAH. THE VIDEOGRAPHER: MICROPHONE, SIR. BY MR. BUSCH: Q. DID WAS MILEY CYRUS RECORDING ACROSS THE HALL WHEN YOU WERE RECORDING "BLURRED
2 3 4 5 6 7 8 9 10 11 12 13 14 15	Q. OKAY. WERE YOU PRESENT DURING THE CREATION OF "BLURRED LINES"? A. I WAS PRESENT. OBVIOUSLY, I SANG IT. I HAD TO BE THERE. Q. WHEN THE — WHEN THE RYTHYM TRACK WAS BEING CREATED, WERE YOU THERE WITH PHARRELL? A. TO BE HONEST, THAT'S THE ONLY PART WHERE — I WAS HIGH ON VICODIN AND ALCOHOL WHEN I SHOWED UP AT THE STUDIO. SO MY RECOLLECTION IS WHEN WE MADE THE SONG, I THOUGHT I WANTED — I — I WANTED TO BE MORE INVOLVED THAN I ACTUALLY WAS BY THE TIME, NINE MONTHS LATER, IT BECAME A HUGE HIT AND I WANTED CREDIT.	2 3 4 5 6 7 8 9 10 11 12 13 14 15	MR. KING: RICHARD, WOULD THIS BE A GOOD TIME FOR HIM TO EAT HIS LUNCH? MR. BUSCH: NO, LET – LET ME GET THROUGH A COUPLE THINGS HERE. THE DEPONENT: OKAY, BUDDY. MR. BUSCH: THEN WE CAN. MR. KING: I CAN HEAR YOUR LAWYER WORKING IN THE NEXT ROOM. THE DEPONENT: YEAH. THE VIDEOGRAPHER: MICROPHONE, SIR. BY MR. BUSCH: Q. DID WAS MILEY CYRUS RECORDING ACROSS THE HALL WHEN YOU WERE RECORDING "BLURRED LINES" AND DID YOU HAVE HER WALK ACROSS TO HAVE
2 3 4 5 6 7 8 9 10 11 12 13 14 15	Q. OKAY. WERE YOU PRESENT DURING THE CREATION OF "BLURRED LINES"? A. I WAS PRESENT. OBVIOUSLY, I SANG IT. I HAD TO BE THERE. Q. WHEN THE WHEN THE RYTHYM TRACK WAS BEING CREATED, WERE YOU THERE WITH PHARRELL? A. TO BE HONEST, THAT'S THE ONLY PART WHERE I WAS HIGH ON VICODIN AND ALCOHOL WHEN I SHOWED UP AT THE STUDIO. SO MY RECOLLECTION IS WHEN WE MADE THE SONG, I THOUGHT I WANTED I I WANTED TO BE MORE INVOLVED THAN I ACTUALLY WAS BY THE TIME, NINE MONTHS LATER, IT BECAME A HUGE HIT AND I WANTED CREDIT. SO I STARTED KIND OF CONVINCING	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16	MR. KING: RICHARD, WOULD THIS BE A GOOD TIME FOR HIM TO EAT HIS LUNCH? MR. BUSCH: NO, LET – LET ME GET THROUGH A COUPLE THINGS HERE. THE DEPONENT: OKAY, BUDDY. MR. BUSCH: THEN WE CAN. MR. KING: I CAN HEAR YOUR LAWYER WORKING IN THE NEXT ROOM. THE DEPONENT: YEAH. THE VIDEOGRAPHER: MICROPHONE, SIR. BY MR. BUSCH: Q. DID WAS MILEY CYRUS RECORDING ACROSS THE HALL WHEN YOU WERE RECORDING "BLURRED LINES" AND DID YOU HAVE HER WALK ACROSS TO HAVE HER COME IN AND LISTEN TO WHAT YOU GUYS WERE
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16	Q. OKAY. WERE YOU PRESENT DURING THE CREATION OF "BLURRED LINES"? A. I WAS PRESENT. OBVIOUSLY, I SANG IT. I HAD TO BE THERE. Q. WHEN THE — WHEN THE RYTHYM TRACK WAS BEING CREATED, WERE YOU THERE WITH PHARRELL? A. TO BE HONEST, THAT'S THE ONLY PART WHERE — I WAS HIGH ON VICODIN AND ALCOHOL WHEN I SHOWED UP AT THE STUDIO. SO MY RECOLLECTION IS WHEN WE MADE THE SONG, I THOUGHT I WANTED — I — I WANTED TO BE MORE INVOLVED THAN I ACTUALLY WAS BY THE TIME, NINE MONTHS LATER, IT BECAME A HUGE HIT AND I WANTED CREDIT. SO I STARTED KIND OF CONVINCING MYSELF THAT I WAS A LITTLE MORE PART OF IT THAN I	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17	MR. KING: RICHARD, WOULD THIS BE A GOOD TIME FOR HIM TO EAT HIS LUNCH? MR. BUSCH: NO, LET — LET ME GET THROUGH A COUPLE THINGS HERE. THE DEPONENT: OKAY, BUDDY. MR. BUSCH: THEN WE CAN. MR. KING: I CAN HEAR YOUR LAWYER WORKING IN THE NEXT ROOM. THE DEPONENT: YEAH. THE VIDEOGRAPHER: MICROPHONE, SIR. BY MR. BUSCH: Q. DID — WAS MILEY CYRUS RECORDING ACROSS THE HALL WHEN YOU WERE RECORDING "BLURRED LINES" AND DID YOU HAVE HER WALK ACROSS TO HAVE HER COME IN AND LISTEN TO WHAT YOU GUYS WERE DOING?
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18	Q. OKAY. WERE YOU PRESENT DURING THE CREATION OF "BLURRED LINES"? A. I WAS PRESENT. OBVIOUSLY, I SANG IT. I HAD TO BE THERE. Q. WHEN THE — WHEN THE RYTHYM TRACK WAS BEING CREATED, WERE YOU THERE WITH PHARRELL? A. TO BE HONEST, THAT'S THE ONLY PART WHERE — I WAS HIGH ON VICODIN AND ALCOHOL WHEN I SHOWED UP AT THE STUDIO. SO MY RECOLLECTION IS WHEN WE MADE THE SONG, I THOUGHT I WANTED — I — I WANTED TO BE MORE INVOLVED THAN I ACTUALLY WAS BY THE TIME, NINE MONTHS LATER, IT BECAME A HUGE HIT AND I WANTED CREDIT. SO I STARTED KIND OF CONVINCING MYSELF THAT I WAS A LITTLE MORE PART OF IT THAN I WAS AND I — BECAUSE I DIDN'T WANT HIM — I WANTED	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18	MR. KING: RICHARD, WOULD THIS BE A GOOD TIME FOR HIM TO EAT HIS LUNCH? MR. BUSCH: NO, LET — LET ME GET THROUGH A COUPLE THINGS HERE. THE DEPONENT: OKAY, BUDDY. MR. BUSCH: THEN WE CAN. MR. KING: I CAN HEAR YOUR LAWYER WORKING IN THE NEXT ROOM. THE DEPONENT: YEAH. THE VIDEOGRAPHER: MICROPHONE, SIR. BY MR. BUSCH: Q. DID — WAS MILEY CYRUS RECORDING ACROSS THE HALL WHEN YOU WERE RECORDING "BLURRED LINES" AND DID YOU HAVE HER WALK ACROSS TO HAVE HER COME IN AND LISTEN TO WHAT YOU GUYS WERE DOING? A. I BELIEVE SHE — WHEN THE SONG WAS
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18	Q. OKAY. WERE YOU PRESENT DURING THE CREATION OF "BLURRED LINES"? A. I WAS PRESENT. OBVIOUSLY, I SANG IT. I HAD TO BE THERE. Q. WHEN THE — WHEN THE RYTHYM TRACK WAS BEING CREATED, WERE YOU THERE WITH PHARRELL? A. TO BE HONEST, THAT'S THE ONLY PART WHERE — I WAS HIGH ON VICODIN AND ALCOHOL WHEN I SHOWED UP AT THE STUDIO. SO MY RECOLLECTION IS WHEN WE MADE THE SONG, I THOUGHT I WANTED — I — I WANTED TO BE MORE INVOLVED THAN I ACTUALLY WAS BY THE TIME, NINE MONTHS LATER, IT BECAME A HUGE HIT AND I WANTED CREDIT. SO I STARTED KIND OF CONVINCING MYSELF THAT I WAS A LITTLE MORE PART OF IT THAN I WAS AND I — BECAUSE I DIDN'T WANT HIM — I WANTED SOME CREDIT FOR THIS BIG HIT.	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18	MR. KING: RICHARD, WOULD THIS BE A GOOD TIME FOR HIM TO EAT HIS LUNCH? MR. BUSCH: NO, LET — LET ME GET THROUGH A COUPLE THINGS HERE. THE DEPONENT: OKAY, BUDDY. MR. BUSCH: THEN WE CAN. MR. KING: I CAN HEAR YOUR LAWYER WORKING IN THE NEXT ROOM. THE DEPONENT: YEAH. THE VIDEOGRAPHER: MICROPHONE, SIR. BY MR. BUSCH: Q. DID — WAS MILEY CYRUS RECORDING ACROSS THE HALL WHEN YOU WERE RECORDING "BLURRED LINES" AND DID YOU HAVE HER WALK ACROSS TO HAVE HER COME IN AND LISTEN TO WHAT YOU GUYS WERE DOING? A. I BELIEVE SHE — WHEN THE SONG WAS COMPLETELY FINISHED, SHE — WE PLAYED IT FOR HER,
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20	Q. OKAY. WERE YOU PRESENT DURING THE CREATION OF "BLURRED LINES"? A. I WAS PRESENT. OBVIOUSLY, I SANG IT. I HAD TO BE THERE. Q. WHEN THE — WHEN THE RYTHYM TRACK WAS BEING CREATED, WERE YOU THERE WITH PHARRELL? A. TO BE HONEST, THAT'S THE ONLY PART WHERE — I WAS HIGH ON VICODIN AND ALCOHOL WHEN I SHOWED UP AT THE STUDIO. SO MY RECOLLECTION IS WHEN WE MADE THE SONG, I THOUGHT I WANTED — I — I WANTED TO BE MORE INVOLVED THAN I ACTUALLY WAS BY THE TIME, NINE MONTHS LATER, IT BECAME A HUGE HIT AND I WANTED CREDIT. SO I STARTED KIND OF CONVINCING MYSELF THAT I WAS A LITTLE MORE PART OF IT THAN I WAS AND I — BECAUSE I DIDN'T WANT HIM — I WANTED SOME CREDIT FOR THIS BIG HIT. BUT THE REALITY IS, IS THAT	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20	MR. KING: RICHARD, WOULD THIS BE A GOOD TIME FOR HIM TO EAT HIS LUNCH? MR. BUSCH: NO, LET — LET ME GET THROUGH A COUPLE THINGS HERE. THE DEPONENT: OKAY, BUDDY. MR. BUSCH: THEN WE CAN. MR. KING: I CAN HEAR YOUR LAWYER WORKING IN THE NEXT ROOM. THE DEPONENT: YEAH. THE VIDEOGRAPHER: MICROPHONE, SIR. BY MR. BUSCH: Q. DID — WAS MILEY CYRUS RECORDING ACROSS THE HALL WHEN YOU WERE RECORDING "BLURRED LINES" AND DID YOU HAVE HER WALK ACROSS TO HAVE HER COME IN AND LISTEN TO WHAT YOU GUYS WERE DOING? A. I BELIEVE SHE — WHEN THE SONG WAS COMPLETELY FINISHED, SHE — WE PLAYED IT FOR HER, YEAH.
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21	Q. OKAY. WERE YOU PRESENT DURING THE CREATION OF "BLURRED LINES"? A. I WAS PRESENT. OBVIOUSLY, I SANG IT. I HAD TO BE THERE. Q. WHEN THE — WHEN THE RYTHYM TRACK WAS BEING CREATED, WERE YOU THERE WITH PHARRELL? A. TO BE HONEST, THAT'S THE ONLY PART WHERE — I WAS HIGH ON VICODIN AND ALCOHOL WHEN I SHOWED UP AT THE STUDIO. SO MY RECOLLECTION IS WHEN WE MADE THE SONG, I THOUGHT I WANTED — I — I WANTED TO BE MORE INVOLVED THAN I ACTUALLY WAS BY THE TIME, NINE MONTHS LATER, IT BECAME A HUGE HIT AND I WANTED CREDIT. SO I STARTED KIND OF CONVINCING MYSELF THAT I WAS A LITTLE MORE PART OF IT THAN I WAS AND I — BECAUSE I DIDN'T WANT HIM — I WANTED SOME CREDIT FOR THIS BIG HIT. BUT THE REALITY IS, IS THAT PHARRELL HAD THE BEAT AND HE WROTE ALMOST EVERY	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21	MR. KING: RICHARD, WOULD THIS BE A GOOD TIME FOR HIM TO EAT HIS LUNCH? MR. BUSCH: NO, LET — LET ME GET THROUGH A COUPLE THINGS HERE. THE DEPONENT: OKAY, BUDDY. MR. BUSCH: THEN WE CAN. MR. KING: I CAN HEAR YOUR LAWYER WORKING IN THE NEXT ROOM. THE DEPONENT: YEAH. THE VIDEOGRAPHER: MICROPHONE, SIR. BY MR. BUSCH: Q. DID — WAS MILEY CYRUS RECORDING ACROSS THE HALL WHEN YOU WERE RECORDING "BLURRED LINES" AND DID YOU HAVE HER WALK ACROSS TO HAVE HER COME IN AND LISTEN TO WHAT YOU GUYS WERE DOING? A. I BELIEVE SHE — WHEN THE SONG WAS COMPLETELY FINISHED, SHE — WE PLAYED IT FOR HER, YEAH. Q. OKAY.
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22	Q. OKAY. WERE YOU PRESENT DURING THE CREATION OF "BLURRED LINES"? A. I WAS PRESENT. OBVIOUSLY, I SANG IT. I HAD TO BE THERE. Q. WHEN THE — WHEN THE RYTHYM TRACK WAS BEING CREATED, WERE YOU THERE WITH PHARRELL? A. TO BE HONEST, THAT'S THE ONLY PART WHERE — I WAS HIGH ON VICODIN AND ALCOHOL WHEN I SHOWED UP AT THE STUDIO. SO MY RECOLLECTION IS WHEN WE MADE THE SONG, I THOUGHT I WANTED — I — I WANTED TO BE MORE INVOLVED THAN I ACTUALLY WAS BY THE TIME, NINE MONTHS LATER, IT BECAME A HUGE HIT AND I WANTED CREDIT. SO I STARTED KIND OF CONVINCING MYSELF THAT I WAS A LITTLE MORE PART OF IT THAN I WAS AND I — BECAUSE I DIDN'T WANT HIM — I WANTED SOME CREDIT FOR THIS BIG HIT. BUT THE REALITY IS, IS THAT PHARRELL HAD THE BEAT AND HE WROTE ALMOST EVERY SINGLE PART OF THE SONG.	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22	MR. KING: RICHARD, WOULD THIS BE A GOOD TIME FOR HIM TO EAT HIS LUNCH? MR. BUSCH: NO, LET — LET ME GET THROUGH A COUPLE THINGS HERE. THE DEPONENT: OKAY, BUDDY. MR. BUSCH: THEN WE CAN. MR. KING: I CAN HEAR YOUR LAWYER WORKING IN THE NEXT ROOM. THE DEPONENT: YEAH. THE VIDEOGRAPHER: MICROPHONE, SIR. BY MR. BUSCH: Q. DID — WAS MILEY CYRUS RECORDING ACROSS THE HALL WHEN YOU WERE RECORDING "BLURRED LINES" AND DID YOU HAVE HER WALK ACROSS TO HAVE HER COME IN AND LISTEN TO WHAT YOU GUYS WERE DOING? A. I BELIEVE SHE — WHEN THE SONG WAS COMPLETELY FINISHED, SHE — WE PLAYED IT FOR HER, YEAH. Q. OKAY. A. SHE WAS PLAYING SOME OF HER MUSIC
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23	Q. OKAY. WERE YOU PRESENT DURING THE CREATION OF "BLURRED LINES"? A. I WAS PRESENT. OBVIOUSLY, I SANG IT. I HAD TO BE THERE. Q. WHEN THE — WHEN THE RYTHYM TRACK WAS BEING CREATED, WERE YOU THERE WITH PHARRELL? A. TO BE HONEST, THAT'S THE ONLY PART WHERE — I WAS HIGH ON VICODIN AND ALCOHOL WHEN I SHOWED UP AT THE STUDIO. SO MY RECOLLECTION IS WHEN WE MADE THE SONG, I THOUGHT I WANTED — I — I WANTED TO BE MORE INVOLVED THAN I ACTUALLY WAS BY THE TIME, NINE MONTHS LATER, IT BECAME A HUGE HIT AND I WANTED CREDIT. SO I STARTED KIND OF CONVINCING MYSELF THAT I WAS A LITTLE MORE PART OF IT THAN I WAS AND I — BECAUSE I DIDN'T WANT HIM — I WANTED SOME CREDIT FOR THIS BIG HIT. BUT THE REALITY IS, IS THAT PHARRELL HAD THE BEAT AND HE WROTE ALMOST EVERY SINGLE PART OF THE SONG. Q. SO — BUT MY QUESTION IS: WERE YOU	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23	MR. KING: RICHARD, WOULD THIS BE A GOOD TIME FOR HIM TO EAT HIS LUNCH? MR. BUSCH: NO, LET — LET ME GET THROUGH A COUPLE THINGS HERE. THE DEPONENT: OKAY, BUDDY. MR. BUSCH: THEN WE CAN. MR. KING: I CAN HEAR YOUR LAWYER WORKING IN THE NEXT ROOM. THE DEPONENT: YEAH. THE VIDEOGRAPHER: MICROPHONE, SIR. BY MR. BUSCH: Q. DID WAS MILEY CYRUS RECORDING ACROSS THE HALL WHEN YOU WERE RECORDING "BLURRED LINES" AND DID YOU HAVE HER WALK ACROSS TO HAVE HER COME IN AND LISTEN TO WHAT YOU GUYS WERE DOING? A. I BELIEVE SHE WHEN THE SONG WAS COMPLETELY FINISHED, SHE WE PLAYED IT FOR HER, YEAH. Q. OKAY. A. SHE WAS PLAYING SOME OF HER MUSIC AND I PLAYED WE PLAYED "BLURRED LINES."
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22	Q. OKAY. WERE YOU PRESENT DURING THE CREATION OF "BLURRED LINES"? A. I WAS PRESENT. OBVIOUSLY, I SANG IT. I HAD TO BE THERE. Q. WHEN THE — WHEN THE RYTHYM TRACK WAS BEING CREATED, WERE YOU THERE WITH PHARRELL? A. TO BE HONEST, THAT'S THE ONLY PART WHERE — I WAS HIGH ON VICODIN AND ALCOHOL WHEN I SHOWED UP AT THE STUDIO. SO MY RECOLLECTION IS WHEN WE MADE THE SONG, I THOUGHT I WANTED — I — I WANTED TO BE MORE INVOLVED THAN I ACTUALLY WAS BY THE TIME, NINE MONTHS LATER, IT BECAME A HUGE HIT AND I WANTED CREDIT. SO I STARTED KIND OF CONVINCING MYSELF THAT I WAS A LITTLE MORE PART OF IT THAN I WAS AND I — BECAUSE I DIDN'T WANT HIM — I WANTED SOME CREDIT FOR THIS BIG HIT. BUT THE REALITY IS, IS THAT PHARRELL HAD THE BEAT AND HE WROTE ALMOST EVERY SINGLE PART OF THE SONG. Q. SO — BUT MY QUESTION IS: WERE YOU PRESENT WHEN THE ORIGINAL RYTHYM TRACK — WHEN THE	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22	MR. KING: RICHARD, WOULD THIS BE A GOOD TIME FOR HIM TO EAT HIS LUNCH? MR. BUSCH: NO, LET — LET ME GET THROUGH A COUPLE THINGS HERE. THE DEPONENT: OKAY, BUDDY. MR. BUSCH: THEN WE CAN. MR. KING: I CAN HEAR YOUR LAWYER WORKING IN THE NEXT ROOM. THE DEPONENT: YEAH. THE VIDEOGRAPHER: MICROPHONE, SIR. BY MR. BUSCH: Q. DID — WAS MILEY CYRUS RECORDING ACROSS THE HALL WHEN YOU WERE RECORDING "BLURRED LINES" AND DID YOU HAVE HER WALK ACROSS TO HAVE HER COME IN AND LISTEN TO WHAT YOU GUYS WERE DOING? A. I BELIEVE SHE — WHEN THE SONG WAS COMPLETELY FINISHED, SHE — WE PLAYED IT FOR HER, YEAH. Q. OKAY. A. SHE WAS PLAYING SOME OF HER MUSIC AND I PLAYED — WE PLAYED "BLURRED LINES." Q. OKAY.
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23	Q. OKAY. WERE YOU PRESENT DURING THE CREATION OF "BLURRED LINES"? A. I WAS PRESENT. OBVIOUSLY, I SANG IT. I HAD TO BE THERE. Q. WHEN THE — WHEN THE RYTHYM TRACK WAS BEING CREATED, WERE YOU THERE WITH PHARRELL? A. TO BE HONEST, THAT'S THE ONLY PART WHERE — I WAS HIGH ON VICODIN AND ALCOHOL WHEN I SHOWED UP AT THE STUDIO. SO MY RECOLLECTION IS WHEN WE MADE THE SONG, I THOUGHT I WANTED — I — I WANTED TO BE MORE INVOLVED THAN I ACTUALLY WAS BY THE TIME, NINE MONTHS LATER, IT BECAME A HUGE HIT AND I WANTED CREDIT. SO I STARTED KIND OF CONVINCING MYSELF THAT I WAS A LITTLE MORE PART OF IT THAN I WAS AND I — BECAUSE I DIDN'T WANT HIM — I WANTED SOME CREDIT FOR THIS BIG HIT. BUT THE REALITY IS, IS THAT PHARRELL HAD THE BEAT AND HE WROTE ALMOST EVERY SINGLE PART OF THE SONG. Q. SO — BUT MY QUESTION IS: WERE YOU	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23	MR. KING: RICHARD, WOULD THIS BE A GOOD TIME FOR HIM TO EAT HIS LUNCH? MR. BUSCH: NO, LET — LET ME GET THROUGH A COUPLE THINGS HERE. THE DEPONENT: OKAY, BUDDY. MR. BUSCH: THEN WE CAN. MR. KING: I CAN HEAR YOUR LAWYER WORKING IN THE NEXT ROOM. THE DEPONENT: YEAH. THE VIDEOGRAPHER: MICROPHONE, SIR. BY MR. BUSCH: Q. DID WAS MILEY CYRUS RECORDING ACROSS THE HALL WHEN YOU WERE RECORDING "BLURRED LINES" AND DID YOU HAVE HER WALK ACROSS TO HAVE HER COME IN AND LISTEN TO WHAT YOU GUYS WERE DOING? A. I BELIEVE SHE WHEN THE SONG WAS COMPLETELY FINISHED, SHE WE PLAYED IT FOR HER, YEAH. Q. OKAY. A. SHE WAS PLAYING SOME OF HER MUSIC AND I PLAYED WE PLAYED "BLURRED LINES."
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23 24	Q. OKAY. WERE YOU PRESENT DURING THE CREATION OF "BLURRED LINES"? A. I WAS PRESENT. OBVIOUSLY, I SANG IT. I HAD TO BE THERE. Q. WHEN THE — WHEN THE RYTHYM TRACK WAS BEING CREATED, WERE YOU THERE WITH PHARRELL? A. TO BE HONEST, THAT'S THE ONLY PART WHERE — I WAS HIGH ON VICODIN AND ALCOHOL WHEN I SHOWED UP AT THE STUDIO. SO MY RECOLLECTION IS WHEN WE MADE THE SONG, I THOUGHT I WANTED — I — I WANTED TO BE MORE INVOLVED THAN I ACTUALLY WAS BY THE TIME, NINE MONTHS LATER, IT BECAME A HUGE HIT AND I WANTED CREDIT. SO I STARTED KIND OF CONVINCING MYSELF THAT I WAS A LITTLE MORE PART OF IT THAN I WAS AND I — BECAUSE I DIDN'T WANT HIM — I WANTED SOME CREDIT FOR THIS BIG HIT. BUT THE REALITY IS, IS THAT PHARRELL HAD THE BEAT AND HE WROTE ALMOST EVERY SINGLE PART OF THE SONG. Q. SO — BUT MY QUESTION IS: WERE YOU PRESENT WHEN THE ORIGINAL RYTHYM TRACK — WHEN THE	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23 24	MR. KING: RICHARD, WOULD THIS BE A GOOD TIME FOR HIM TO EAT HIS LUNCH? MR. BUSCH: NO, LET — LET ME GET THROUGH A COUPLE THINGS HERE. THE DEPONENT: OKAY, BUDDY. MR. BUSCH: THEN WE CAN. MR. KING: I CAN HEAR YOUR LAWYER WORKING IN THE NEXT ROOM. THE DEPONENT: YEAH. THE VIDEOGRAPHER: MICROPHONE, SIR. BY MR. BUSCH: Q. DID — WAS MILEY CYRUS RECORDING ACROSS THE HALL WHEN YOU WERE RECORDING "BLURRED LINES" AND DID YOU HAVE HER WALK ACROSS TO HAVE HER COME IN AND LISTEN TO WHAT YOU GUYS WERE DOING? A. I BELIEVE SHE — WHEN THE SONG WAS COMPLETELY FINISHED, SHE — WE PLAYED IT FOR HER, YEAH. Q. OKAY. A. SHE WAS PLAYING SOME OF HER MUSIC AND I PLAYED — WE PLAYED "BLURRED LINES." Q. OKAY.



Kelli Norden and Associates Court Reporters 310.820.7733 phone 310.820.7933 fax 11835 W. Olympic Boulevard Suite 680t Los Angeles, California 90064 knaekellinorden.com www.kellinorden.com

,	CAN HE EAT HIS LINICHS		LOG ANGELES CANTESPINI
1 2	CAN HE EAT HIS LUNCH?	1	LOS ANGELES, CALIFORNIA, WEDNESDAY
II	MR. BUSCH: I MEAN	2	APRIL 23, 2014
3	THE DEPONENT: IT'S OKAY,	3	1:55 P.M.
4	MR. BUSCH: DO YOU WANT TO	4	
5	THE DEPONENT: I TAKE ABOUT THREE	5	THE VIDEOGRAPHER: AND WE'RE BACK
6	MINUTES TO EAT A MEAL. IT MIGHT BE THE AMOUNT OF	6	ON THE VIDEOTAPE RECORD AT 1:55 P.M.
7	TIME YOU NEED RIGHT THERE.	7	
8	MR. BUSCH: ALL RIGHT. IT'S FINE,	8	EXAMINATION (RESUMED)
9	LET'S TAKE A BREAK.	9	BY MR. BUSCH:
10	THE DEPONENT: IS THAT OKAY?	10	Q. OKAY. MR. THICKE, DURING OUR LUNCH
11	YEAH. I MEAN, I DON'T WANT I DON'T WANT	11	BREAK, DID YOU CONSULT WITH YOUR ATTORNEY ABOUT
12	EVERYONE TO LEAVE AND THEN I CAN DO I CAN DO	12	ANY OF YOUR TESTIMONY?
13	THREE	13	A. NO, SIR.
14	MR. KING: WELL, YOU CAN DO LONGER	14	Q. OKAY, ALL RIGHT, I WANT TO ASK
15	THAN THREE	15	YOU: YOU RECEIVE WRITER CREDIT ON "BLURRED
16	THE DEPONENT: SMACK DOWN,	16	LINES"; CORRECT?
17	MR. BUSCH: LET ME ASK ONE LAST	17	A. YES.
18	QUESTION BEFORE YOU GO.		
li .		18	Q. AND YOU OWN PART OF THE PUBLISHING
19	THE DEPONENT: YES, PLEASE.	19	ON "BLURRED LINES"; CORRECT?
20	BY MR. BUSCH:	20	A. YES.
21	Q. SO JUST TO BE 100 PERCENT CLEAR	21	Q. WHAT PERCENTAGE WHAT WRITER
22	A. YES.	22	CREDIT DID YOU GET?
23	Q YOU WERE PRESENT WHEN THE TRACKS	23	A. I BELIEVE IN THE END, THAT ONCE
24	WERE BEING LAID DOWN, BUT YOU OFFERED NO	24	T.I. JOINED I'M SORRY. ACTUALLY, I DON'T KNOW
25	SUGGESTION, THOUGHTS OR INPUT ABOUT WHAT TO DO OR	25	IF I THINK IT'S 22 PERCENT. MIGHT BE 18
	0.0		_ ,
·	82	<u></u>	84
	WHAT STYLE TO EVOKE OR ANYTHING?		DEDOCATE COMPTUNIO LUCE THAT
l		1	PERCENT. SOMETHING LIKE THAT.
2	A. ABSOLUTELY NOT.	2	Q. AND WHAT PERCENT THAT'S
3			
	Q. OKAY. ALL RIGHT. THANK YOU VERY	3	PUBLISHING THAT YOU HAVE AS WELL?
4	MUCH.	4	A. YES, IT SHOULD BE THE SAME. THE
5	MUCH. A. THANK YOU.	_	
5 6	MUCH. A. THANK YOU. THE VIDEOGRAPHER: GO OFF THE	4	A. YES, IT SHOULD BE THE SAME. THE
5 6 7	MUCH. A. THANK YOU. THE VIDEOGRAPHER: GO OFF THE VIDEOTAPE RECORD AT 12:55 P.M.	4 5	A. YES, IT SHOULD BE THE SAME, THE WRITING CREDIT AND THE PUBLISHING SHOULD BE THE
5 6 7 8	MUCH. A. THANK YOU. THE VIDEOGRAPHER: GO OFF THE VIDEOTAPE RECORD AT 12:55 P.M. AND THAT'S OFF.	4 5 6	A. YES, IT SHOULD BE THE SAME. THE WRITING CREDIT AND THE PUBLISHING SHOULD BE THE SAME.
5 6 7	MUCH. A. THANK YOU. THE VIDEOGRAPHER: GO OFF THE VIDEOTAPE RECORD AT 12:55 P.M.	4 5 6 7	A. YES, IT SHOULD BE THE SAME. THE WRITING CREDIT AND THE PUBLISHING SHOULD BE THE SAME. Q. OKAY. ALL RIGHT. SO I GUESS MY
5 6 7 8	MUCH. A. THANK YOU. THE VIDEOGRAPHER: GO OFF THE VIDEOTAPE RECORD AT 12:55 P.M. AND THAT'S OFF.	4 5 6 7 8	A. YES, IT SHOULD BE THE SAME. THE WRITING CREDIT AND THE PUBLISHING SHOULD BE THE SAME. Q. OKAY. ALL RIGHT. SO I GUESS MY QUESTION IS: YOU SAID EARLIER IN THIS DEPOSITION
5 6 7 8 9	MUCH. A. THANK YOU. THE VIDEOGRAPHER: GO OFF THE VIDEOTAPE RECORD AT 12:55 P.M. AND THAT'S OFF. (WHEREUPON, A LUNCHEON RECESS WAS	4 5 6 7 8 9	A. YES, IT SHOULD BE THE SAME. THE WRITING CREDIT AND THE PUBLISHING SHOULD BE THE SAME. Q. OKAY. ALL RIGHT. SO I GUESS MY QUESTION IS: YOU SAID EARLIER IN THIS DEPOSITION THAT ONE OF THE REASONS THAT YOU SAID WHAT YOU
5 6 7 8 9 10	MUCH. A. THANK YOU. THE VIDEOGRAPHER: GO OFF THE VIDEOTAPE RECORD AT 12:55 P.M. AND THAT'S OFF. (WHEREUPON, A LUNCHEON RECESS WAS HELD FROM 12:55 P.M. TO 1:55 P.M.)	4 5 6 7 8 9	A. YES, IT SHOULD BE THE SAME. THE WRITING CREDIT AND THE PUBLISHING SHOULD BE THE SAME. Q. OKAY. ALL RIGHT. SO I GUESS MY QUESTION IS: YOU SAID EARLIER IN THIS DEPOSITION THAT ONE OF THE REASONS THAT YOU SAID WHAT YOU SAID IN THE INTERVIEWS ABOUT YOUR INVOLVEMENT IN THE CREATION OF "BLURRED LINES" WAS BECAUSE YOU
5 6 7 8 9 10 11	MUCH. A. THANK YOU. THE VIDEOGRAPHER: GO OFF THE VIDEOTAPE RECORD AT 12:55 P.M. AND THAT'S OFF. (WHEREUPON, A LUNCHEON RECESS WAS HELD FROM 12:55 P.M. TO 1:55 P.M.)	4 5 6 7 8 9 10	A. YES, IT SHOULD BE THE SAME. THE WRITING CREDIT AND THE PUBLISHING SHOULD BE THE SAME. Q. OKAY. ALL RIGHT. SO I GUESS MY QUESTION IS: YOU SAID EARLIER IN THIS DEPOSITION THAT ONE OF THE REASONS THAT YOU SAID WHAT YOU SAID IN THE INTERVIEWS ABOUT YOUR INVOLVEMENT IN
5 6 7 8 9 10 11 12	MUCH. A. THANK YOU. THE VIDEOGRAPHER: GO OFF THE VIDEOTAPE RECORD AT 12:55 P.M. AND THAT'S OFF. (WHEREUPON, A LUNCHEON RECESS WAS HELD FROM 12:55 P.M. TO 1:55 P.M.) ///	4 5 6 7 8 9 10 11 12 13	A. YES, IT SHOULD BE THE SAME. THE WRITING CREDIT AND THE PUBLISHING SHOULD BE THE SAME. Q. OKAY. ALL RIGHT. SO I GUESS MY QUESTION IS: YOU SAID EARLIER IN THIS DEPOSITION THAT ONE OF THE REASONS THAT YOU SAID WHAT YOU SAID IN THE INTERVIEWS ABOUT YOUR INVOLVEMENT IN THE CREATION OF "BLURRED LINES" WAS BECAUSE YOU WERE JEALOUS, IT WAS A BIG HIT AND YOU WANTED A. YES.
5 6 7 8 9 10 11 12 13	MUCH. A. THANK YOU. THE VIDEOGRAPHER: GO OFF THE VIDEOTAPE RECORD AT 12:55 P.M. AND THAT'S OFF. (WHEREUPON, A LUNCHEON RECESS WAS HELD FROM 12:55 P.M. TO 1:55 P.M.) ///	4 5 6 7 8 9 10 11 12 13	A. YES, IT SHOULD BE THE SAME. THE WRITING CREDIT AND THE PUBLISHING SHOULD BE THE SAME. Q. OKAY. ALL RIGHT. SO I GUESS MY QUESTION IS: YOU SAID EARLIER IN THIS DEPOSITION THAT ONE OF THE REASONS THAT YOU SAID WHAT YOU SAID IN THE INTERVIEWS ABOUT YOUR INVOLVEMENT IN THE CREATION OF "BLURRED LINES" WAS BECAUSE YOU WERE JEALOUS, IT WAS A BIG HIT AND YOU WANTED A. YES. Q PEOPLE TO BELIEVE THAT YOU WERE
5 6 7 8 9 10 11 12 13	MUCH. A. THANK YOU. THE VIDEOGRAPHER: GO OFF THE VIDEOTAPE RECORD AT 12:55 P.M. AND THAT'S OFF. (WHEREUPON, A LUNCHEON RECESS WAS HELD FROM 12:55 P.M. TO 1:55 P.M.) ///	4 5 6 7 8 9 10 11 12 13 14 15	A. YES, IT SHOULD BE THE SAME. THE WRITING CREDIT AND THE PUBLISHING SHOULD BE THE SAME. Q. OKAY. ALL RIGHT. SO I GUESS MY QUESTION IS: YOU SAID EARLIER IN THIS DEPOSITION THAT ONE OF THE REASONS THAT YOU SAID WHAT YOU SAID IN THE INTERVIEWS ABOUT YOUR INVOLVEMENT IN THE CREATION OF "BLURRED LINES" WAS BECAUSE YOU WERE JEALOUS, IT WAS A BIG HIT AND YOU WANTED A. YES. Q PEOPLE TO BELIEVE THAT YOU WERE INVOLVED
5 6 7 8 9 10 11 12 13 14 15	MUCH. A. THANK YOU. THE VIDEOGRAPHER: GO OFF THE VIDEOTAPE RECORD AT 12:55 P.M. AND THAT'S OFF. (WHEREUPON, A LUNCHEON RECESS WAS HELD FROM 12:55 P.M. TO 1:55 P.M.) ///	4 5 6 7 8 9 10 11 12 13 14 15	A. YES, IT SHOULD BE THE SAME. THE WRITING CREDIT AND THE PUBLISHING SHOULD BE THE SAME. Q. OKAY. ALL RIGHT. SO I GUESS MY QUESTION IS: YOU SAID EARLIER IN THIS DEPOSITION THAT ONE OF THE REASONS THAT YOU SAID WHAT YOU SAID IN THE INTERVIEWS ABOUT YOUR INVOLVEMENT IN THE CREATION OF "BLURRED LINES" WAS BECAUSE YOU WERE JEALOUS, IT WAS A BIG HIT AND YOU WANTED A. YES. Q PEOPLE TO BELIEVE THAT YOU WERE INVOLVED A. NOT UPSET. JEAL I'M SO SORRY
5 6 7 8 9 10 11 12 13 14 15 16	MUCH. A. THANK YOU. THE VIDEOGRAPHER: GO OFF THE VIDEOTAPE RECORD AT 12:55 P.M. AND THAT'S OFF. (WHEREUPON, A LUNCHEON RECESS WAS HELD FROM 12:55 P.M. TO 1:55 P.M.) ///	4 5 6 7 8 9 10 11 12 13 14 15 16 17	A. YES, IT SHOULD BE THE SAME. THE WRITING CREDIT AND THE PUBLISHING SHOULD BE THE SAME. Q. OKAY. ALL RIGHT. SO I GUESS MY QUESTION IS: YOU SAID EARLIER IN THIS DEPOSITION THAT ONE OF THE REASONS THAT YOU SAID WHAT YOU SAID IN THE INTERVIEWS ABOUT YOUR INVOLVEMENT IN THE CREATION OF "BLURRED LINES" WAS BECAUSE YOU WERE JEALOUS, IT WAS A BIG HIT AND YOU WANTED A. YES. Q PEOPLE TO BELIEVE THAT YOU WERE INVOLVED A. NOT UPSET. JEAL I'M SO SORRY TO INTERRUPT YOU. I APOLOGIZE.
5 6 7 8 9 10 11 12 13 14 15 16 17	MUCH. A. THANK YOU. THE VIDEOGRAPHER: GO OFF THE VIDEOTAPE RECORD AT 12:55 P.M. AND THAT'S OFF. (WHEREUPON, A LUNCHEON RECESS WAS HELD FROM 12:55 P.M. TO 1:55 P.M.) ///	4 5 6 7 8 9 10 11 12 13 14 15 16 17 18	A. YES, IT SHOULD BE THE SAME. THE WRITING CREDIT AND THE PUBLISHING SHOULD BE THE SAME. Q. OKAY. ALL RIGHT. SO I GUESS MY QUESTION IS: YOU SAID EARLIER IN THIS DEPOSITION THAT ONE OF THE REASONS THAT YOU SAID WHAT YOU SAID IN THE INTERVIEWS ABOUT YOUR INVOLVEMENT IN THE CREATION OF "BLURRED LINES" WAS BECAUSE YOU WERE JEALOUS, IT WAS A BIG HIT AND YOU WANTED A. YES. Q PEOPLE TO BELIEVE THAT YOU WERE INVOLVED A. NOT UPSET. JEAL I'M SO SORRY TO INTERRUPT YOU. I APOLOGIZE. Q. OKAY. BUT YOU USED THE WORD
5 6 7 8 9 10 11 12 13 14 15 16 17 18	MUCH. A. THANK YOU. THE VIDEOGRAPHER: GO OFF THE VIDEOTAPE RECORD AT 12:55 P.M. AND THAT'S OFF. (WHEREUPON, A LUNCHEON RECESS WAS HELD FROM 12:55 P.M. TO 1:55 P.M.) ///	4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19	A. YES, IT SHOULD BE THE SAME. THE WRITING CREDIT AND THE PUBLISHING SHOULD BE THE SAME. Q. OKAY. ALL RIGHT. SO I GUESS MY QUESTION IS: YOU SAID EARLIER IN THIS DEPOSITION THAT ONE OF THE REASONS THAT YOU SAID WHAT YOU SAID IN THE INTERVIEWS ABOUT YOUR INVOLVEMENT IN THE CREATION OF "BLURRED LINES" WAS BECAUSE YOU WERE JEALOUS, IT WAS A BIG HIT AND YOU WANTED A. YES. Q PEOPLE TO BELIEVE THAT YOU WERE INVOLVED A. NOT UPSET. JEAL I'M SO SORRY TO INTERRUPT YOU. I APOLOGIZE. Q. OKAY. BUT YOU USED THE WORD "JEALOUS"?
5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20	MUCH. A. THANK YOU. THE VIDEOGRAPHER: GO OFF THE VIDEOTAPE RECORD AT 12:55 P.M. AND THAT'S OFF. (WHEREUPON, A LUNCHEON RECESS WAS HELD FROM 12:55 P.M. TO 1:55 P.M.) ///	4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20	A. YES, IT SHOULD BE THE SAME. THE WRITING CREDIT AND THE PUBLISHING SHOULD BE THE SAME. Q. OKAY. ALL RIGHT. SO I GUESS MY QUESTION IS: YOU SAID EARLIER IN THIS DEPOSITION THAT ONE OF THE REASONS THAT YOU SAID WHAT YOU SAID IN THE INTERVIEWS ABOUT YOUR INVOLVEMENT IN THE CREATION OF "BLURRED LINES" WAS BECAUSE YOU WERE JEALOUS, IT WAS A BIG HIT AND YOU WANTED A. YES. Q PEOPLE TO BELIEVE THAT YOU WERE INVOLVED A. NOT UPSET. JEAL I'M SO SORRY TO INTERRUPT YOU. I APOLOGIZE. Q. OKAY. BUT YOU USED THE WORD "JEALOUS"? A. YES.
5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21	MUCH. A. THANK YOU. THE VIDEOGRAPHER: GO OFF THE VIDEOTAPE RECORD AT 12:55 P.M. AND THAT'S OFF. (WHEREUPON, A LUNCHEON RECESS WAS HELD FROM 12:55 P.M. TO 1:55 P.M.) ///	4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21	A. YES, IT SHOULD BE THE SAME. THE WRITING CREDIT AND THE PUBLISHING SHOULD BE THE SAME. Q. OKAY. ALL RIGHT. SO I GUESS MY QUESTION IS: YOU SAID EARLIER IN THIS DEPOSITION THAT ONE OF THE REASONS THAT YOU SAID WHAT YOU SAID IN THE INTERVIEWS ABOUT YOUR INVOLVEMENT IN THE CREATION OF "BLURRED LINES" WAS BECAUSE YOU WERE JEALOUS, IT WAS A BIG HIT AND YOU WANTED A. YES. Q PEOPLE TO BELIEVE THAT YOU WERE INVOLVED A. NOT UPSET. JEAL I'M SO SORRY TO INTERRUPT YOU. I APOLOGIZE. Q. OKAY. BUT YOU USED THE WORD "JEALOUS"? A. YES. Q. OKAY. I GUESS MY QUESTION TO YOU
5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22	MUCH. A. THANK YOU. THE VIDEOGRAPHER: GO OFF THE VIDEOTAPE RECORD AT 12:55 P.M. AND THAT'S OFF. (WHEREUPON, A LUNCHEON RECESS WAS HELD FROM 12:55 P.M. TO 1:55 P.M.) ///	4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22	A. YES, IT SHOULD BE THE SAME. THE WRITING CREDIT AND THE PUBLISHING SHOULD BE THE SAME. Q. OKAY. ALL RIGHT. SO I GUESS MY QUESTION IS: YOU SAID EARLIER IN THIS DEPOSITION THAT ONE OF THE REASONS THAT YOU SAID WHAT YOU SAID IN THE INTERVIEWS ABOUT YOUR INVOLVEMENT IN THE CREATION OF "BLURRED LINES" WAS BECAUSE YOU WERE JEALOUS, IT WAS A BIG HIT AND YOU WANTED A. YES. Q PEOPLE TO BELIEVE THAT YOU WERE INVOLVED A. NOT UPSET. JEAL I'M SO SORRY TO INTERRUPT YOU. I APOLOGIZE. Q. OKAY. BUT YOU USED THE WORD "JEALOUS"? A. YES. Q. OKAY. I GUESS MY QUESTION TO YOU IS: WHY WOULD YOU NEED TO BE JEALOUS IF YOU HAD
5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23	MUCH. A. THANK YOU. THE VIDEOGRAPHER: GO OFF THE VIDEOTAPE RECORD AT 12:55 P.M. AND THAT'S OFF. (WHEREUPON, A LUNCHEON RECESS WAS HELD FROM 12:55 P.M. TO 1:55 P.M.) ///	4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21	A. YES, IT SHOULD BE THE SAME. THE WRITING CREDIT AND THE PUBLISHING SHOULD BE THE SAME. Q. OKAY. ALL RIGHT. SO I GUESS MY QUESTION IS: YOU SAID EARLIER IN THIS DEPOSITION THAT ONE OF THE REASONS THAT YOU SAID WHAT YOU SAID IN THE INTERVIEWS ABOUT YOUR INVOLVEMENT IN THE CREATION OF "BLURRED LINES" WAS BECAUSE YOU WERE JEALOUS, IT WAS A BIG HIT AND YOU WANTED A. YES. Q PEOPLE TO BELIEVE THAT YOU WERE INVOLVED A. NOT UPSET. JEAL I'M SO SORRY TO INTERRUPT YOU. I APOLOGIZE. Q. OKAY. BUT YOU USED THE WORD "JEALOUS"? A. YES. Q. OKAY. I GUESS MY QUESTION TO YOU IS: WHY WOULD YOU NEED TO BE JEALOUS IF YOU HAD RECEIVED WRITERS CREDIT AND PUBLISHING CREDIT?
5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23 24	MUCH. A. THANK YOU. THE VIDEOGRAPHER: GO OFF THE VIDEOTAPE RECORD AT 12:55 P.M. AND THAT'S OFF. (WHEREUPON, A LUNCHEON RECESS WAS HELD FROM 12:55 P.M. TO 1:55 P.M.) ///	4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22	A. YES, IT SHOULD BE THE SAME. THE WRITING CREDIT AND THE PUBLISHING SHOULD BE THE SAME. Q. OKAY. ALL RIGHT. SO I GUESS MY QUESTION IS: YOU SAID EARLIER IN THIS DEPOSITION THAT ONE OF THE REASONS THAT YOU SAID WHAT YOU SAID IN THE INTERVIEWS ABOUT YOUR INVOLVEMENT IN THE CREATION OF "BLURRED LINES" WAS BECAUSE YOU WERE JEALOUS, IT WAS A BIG HIT AND YOU WANTED A. YES. Q PEOPLE TO BELIEVE THAT YOU WERE INVOLVED A. NOT UPSET. JEAL I'M SO SORRY TO INTERRUPT YOU. I APOLOGIZE. Q. OKAY. BUT YOU USED THE WORD "JEALOUS"? A. YES. Q. OKAY. I GUESS MY QUESTION TO YOU IS: WHY WOULD YOU NEED TO BE JEALOUS IF YOU HAD RECEIVED WRITERS CREDIT AND PUBLISHING CREDIT? A. BECAUSE I ALWAYS PRIDED I MYSELF
5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23	MUCH. A. THANK YOU. THE VIDEOGRAPHER: GO OFF THE VIDEOTAPE RECORD AT 12:55 P.M. AND THAT'S OFF. (WHEREUPON, A LUNCHEON RECESS WAS HELD FROM 12:55 P.M. TO 1:55 P.M.) ///	4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23	A. YES, IT SHOULD BE THE SAME. THE WRITING CREDIT AND THE PUBLISHING SHOULD BE THE SAME. Q. OKAY. ALL RIGHT. SO I GUESS MY QUESTION IS: YOU SAID EARLIER IN THIS DEPOSITION THAT ONE OF THE REASONS THAT YOU SAID WHAT YOU SAID IN THE INTERVIEWS ABOUT YOUR INVOLVEMENT IN THE CREATION OF "BLURRED LINES" WAS BECAUSE YOU WERE JEALOUS, IT WAS A BIG HIT AND YOU WANTED A. YES. Q PEOPLE TO BELIEVE THAT YOU WERE INVOLVED A. NOT UPSET. JEAL I'M SO SORRY TO INTERRUPT YOU. I APOLOGIZE. Q. OKAY. BUT YOU USED THE WORD "JEALOUS"? A. YES. Q. OKAY. I GUESS MY QUESTION TO YOU IS: WHY WOULD YOU NEED TO BE JEALOUS IF YOU HAD RECEIVED WRITERS CREDIT AND PUBLISHING CREDIT?
5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23 24	MUCH. A. THANK YOU. THE VIDEOGRAPHER: GO OFF THE VIDEOTAPE RECORD AT 12:55 P.M. AND THAT'S OFF. (WHEREUPON, A LUNCHEON RECESS WAS HELD FROM 12:55 P.M. TO 1:55 P.M.) ///	4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23 24	A. YES, IT SHOULD BE THE SAME. THE WRITING CREDIT AND THE PUBLISHING SHOULD BE THE SAME. Q. OKAY. ALL RIGHT. SO I GUESS MY QUESTION IS: YOU SAID EARLIER IN THIS DEPOSITION THAT ONE OF THE REASONS THAT YOU SAID WHAT YOU SAID IN THE INTERVIEWS ABOUT YOUR INVOLVEMENT IN THE CREATION OF "BLURRED LINES" WAS BECAUSE YOU WERE JEALOUS, IT WAS A BIG HIT AND YOU WANTED A. YES. Q PEOPLE TO BELIEVE THAT YOU WERE INVOLVED A. NOT UPSET. JEAL I'M SO SORRY TO INTERRUPT YOU. I APOLOGIZE. Q. OKAY. BUT YOU USED THE WORD "JEALOUS"? A. YES. Q. OKAY. I GUESS MY QUESTION TO YOU IS: WHY WOULD YOU NEED TO BE JEALOUS IF YOU HAD RECEIVED WRITERS CREDIT AND PUBLISHING CREDIT? A. BECAUSE I ALWAYS PRIDED I MYSELF



Kelli Norden and Associates Court Reporters 310.820.7733 phone 310.820.7933 fax 11833 W. Olympic Boulevard Suite 680E Los Angeles, California 90064 knaskellinorden.com www.kellinorden.com

		1	
1	ALBUMS MYSELF, AND THE FACT THAT I WAS UNABLE TO	1	MY IDEA WOULD MAKE IT MORE PERSONAL BECAUSE MY
2	WRITE AND PRODUCE BY MYSELF A RECORD THAT BIG AND	2	MUSIC HAS ALWAYS BEEN SO PERSONAL, THAT THIS WAS
3	THAT SUCCESSFUL.	3	THE FIRST TIME I HAD A SONG OUT THAT WASN'T
4	ONCE ONCE IT BECAME SUCCESSFUL,	4	
5	FELT LIKE I WANTED TO HAVE SOME OF THE CREDIT	5	PERSONAL AND HAD NOTHING TO DO WITH ME, AND YET IT
6	FOR THE OTHER SIX ALBUMS' WORTH OF WORK THAT I HAD	6	WAS MY BIGGEST SUCCESSFUL, WHICH, YOU KNOW, WAS
7	DONE, BECAUSE PHARRELL, BEING SUCH A WELL-KNOWN	1	VERY TOUGH FOR ME.
8	PRODUCER AND WRITER, EVERYBODY, AS THEY ENDED UP	7	AND SO I LIED IN MY STORY SO I
9	DOING, GAVE PHARRELL MOST OF THAT CREDIT.	8	COULD AT LEAST MAKE IT SEEM LIKE, HEY, I'M THE GUY
10	I GOT CREDIT FOR BEING THE STAR OF	9	WHO CAME UP WITH THIS GREAT IDEA. AND YOU KNOW
11	THE SONG, BUT PHARRELL, DESERVEDLY SO, GOT THE	10	WHAT? I DIDN'T EVEN USE THE MARVIN GAYE THING
12		11	UNTIL EVERYONE STARTED SAYING TO ME, "HEY, IT'S
13	CREDIT FOR WRITING AND PRODUCING THE SONG THE RECORD.	12	REMINISCENT OF THE MARVIN GAYE SONG."
14		13	AND I WAS LIKE, "WELL, YEAH, THAT
1	AND THE RECORD WOULD HAVE HAPPENED	14	WAS MY IDEA. I WANTED TO DO SOMETHING LIKE THAT."
15	WITH OR WITHOUT ME. I JUST WAS LUCKY ENOUGH TO BE	15	THERE WAS NO OTHER WAY FOR ME TO GET CREDIT FOR
16	THERE WHEN HE WROTE IT AND I WAS IN THE ROOM.	16	THIS BIGGEST SONG OF THE YEAR UNLESS IT WAS MY
17	AND BECAUSE HIM AND I HAVE WRITTEN	17	IDEA.
18	TOGETHER BEFORE AND HE RESPECTS ME AS A WRITER,	18	Q. WHICH NONE OF IT WAS?
19	AND HE KNOWS THAT I WRITE AND PRODUCE MY OWN	19	A. WHICH NONE OF IT WAS MY IDEA.
20	MUSIC LIKE THAT LAST SONG, THAT'S ME BY MYSELF,	20	Q. ALL RIGHT. IN YOUR INTERVIEW
21	WRITING AT THE PIANO HE KNOWS I CAN DO THAT ON	21	WITH ON THE "OPRAH SHOW"
22	MY OWN.	22	A. YES.
23	SO HE WAS VERY GENEROUS BY GIVING	23	Q YOU SAID:
24	ME A LARGER PERCENTAGE OF PUBLISHING THAN I	24	"YOU CAN'T OWN A FEELING.
25	DESERVED.	25	YOU OWN THE MELODIES, THE BASS
	0.0		
	86		88
1	Q. YEAH. I I STILL I DON'T		LINE THE GUODE PROGRESSIONS
2	MY POINT	1	LINE, THE CHORD PROGRESSIONS,
3	A. OKAY.	2	THE SYNCOPATION."
4	Q MY QUESTION TO YOU IS THIS:	3	OKAY?
5	WHY, SINCE YOU HAD RECEIVED WRITERS CREDIT	4	A. UH-HUH.
5	A. YES.	5	Q. MY QUESTION TO YOU IS: DO YOU
7		6	BELIEVE THERE IS ANY SIMILARITY IN ANY OF THE
8	Q SINCE YOU HAD RECEIVED 20	7	MELODIES BETWEEN "BLURRED LINES" AND "GOT TO GIVE
9	PERCENT APPRO XIMATELY 20 PERCENT WRITERS	8	IT UP"?
_	A. BECAUSE THE PUBLIC Q. HOLD ON	9	A. NOT A SINGLE MELODY NOTE IS THE
10		10	SAME. ABSOLUTELY NOT.
11	A DOESN'T KNOW THOSE THINGS.		6 - 13 - 13 - 14 - 14 - 14 - 14 - 14 - 14
10		11	Q. AND NOTHING SIMILAR, AS WE'VE
12	Q. LET ME	12	TALKED ABOUT EARLIER, IN YOUR VIEW, ABOUT THE BASS
13	Q. LET ME A. THE PUBLIC WOULD ONLY KNOW IT IF I	12 13	TALKED ABOUT EARLIER, IN YOUR VIEW, ABOUT THE BASS LINES?
13 14	Q. LET ME A. THE PUBLIC WOULD ONLY KNOW IT IF I SOMEHOW SAID IT WAS MY IDEA. SO THE ONLY WAY TO	12 13 14	TALKED ABOUT EARLIER, IN YOUR VIEW, ABOUT THE BASS LINES? A. THE BASS LINES ARE COMPLETELY
13 14 15	Q. LET ME A. THE PUBLIC WOULD ONLY KNOW IT IF I SOMEHOW SAID IT WAS MY IDEA. SO THE ONLY WAY TO MAKE THE SONG MY IDEA WAS TO SAY, "HEY, I WANTED	12 13 14 15	TALKED ABOUT EARLIER, IN YOUR VIEW, ABOUT THE BASS LINES?
13 14 15 16	Q. LET ME A. THE PUBLIC WOULD ONLY KNOW IT IF I SOMEHOW SAID IT WAS MY IDEA. SO THE ONLY WAY TO MAKE THE SONG MY IDEA WAS TO SAY, "HEY, I WANTED TO DO SOMETHING LIKE THIS AND PHARRELL MADE IT."	12 13 14 15 16	TALKED ABOUT EARLIER, IN YOUR VIEW, ABOUT THE BASS LINES? A. THE BASS LINES ARE COMPLETELY DIFFERENT. Q. OKAY.
13 14 15 16 17	Q. LET ME A. THE PUBLIC WOULD ONLY KNOW IT IF I SOMEHOW SAID IT WAS MY IDEA. SO THE ONLY WAY TO MAKE THE SONG MY IDEA WAS TO SAY, "HEY, I WANTED TO DO SOMETHING LIKE THIS AND PHARRELL MADE IT." BUT THE TRUTH WAS PHARRELL MADE IT	12 13 14 15	TALKED ABOUT EARLIER, IN YOUR VIEW, ABOUT THE BASS LINES? A. THE BASS LINES ARE COMPLETELY DIFFERENT. Q. OKAY. A. THE RYTHYMS AND THE NOTES.
13 14 15 16 17 18	Q. LET ME A. THE PUBLIC WOULD ONLY KNOW IT IF I SOMEHOW SAID IT WAS MY IDEA. SO THE ONLY WAY TO MAKE THE SONG MY IDEA WAS TO SAY, "HEY, I WANTED TO DO SOMETHING LIKE THIS AND PHARRELL MADE IT." BUT THE TRUTH WAS PHARRELL MADE IT WITHOUT ME AND HE WAS HE WOULD HAVE MADE IT	12 13 14 15 16	TALKED ABOUT EARLIER, IN YOUR VIEW, ABOUT THE BASS LINES? A. THE BASS LINES ARE COMPLETELY DIFFERENT. Q. OKAY. A. THE RYTHYMS AND THE NOTES. Q. AND HOW DO YOU KNOW THE NOTES ARE
13 14 15 16 17 18	Q. LET ME A. THE PUBLIC WOULD ONLY KNOW IT IF I SOMEHOW SAID IT WAS MY IDEA. SO THE ONLY WAY TO MAKE THE SONG MY IDEA WAS TO SAY, "HEY, I WANTED TO DO SOMETHING LIKE THIS AND PHARRELL MADE IT." BUT THE TRUTH WAS PHARRELL MADE IT WITHOUT ME AND HE WAS HE WOULD HAVE MADE IT WITHOUT ME AND I WAS LUCKY TO BE IN THE ROOM.	12 13 14 15 16 17	TALKED ABOUT EARLIER, IN YOUR VIEW, ABOUT THE BASS LINES? A. THE BASS LINES ARE COMPLETELY DIFFERENT. Q. OKAY. A. THE RYTHYMS AND THE NOTES. Q. AND HOW DO YOU KNOW THE NOTES ARE DIFFERENT IF YOU CAN'T READ MUSIC?
13 14 15 16 17 18 19	Q. LET ME A. THE PUBLIC WOULD ONLY KNOW IT IF I SOMEHOW SAID IT WAS MY IDEA. SO THE ONLY WAY TO MAKE THE SONG MY IDEA WAS TO SAY, "HEY, I WANTED TO DO SOMETHING LIKE THIS AND PHARRELL MADE IT." BUT THE TRUTH WAS PHARRELL MADE IT WITHOUT ME AND HE WAS HE WOULD HAVE MADE IT WITHOUT ME AND I WAS LUCKY TO BE IN THE ROOM. Q. OKAY. SO THAT'S WHY YOU CAME UP	12 13 14 15 16 17	TALKED ABOUT EARLIER, IN YOUR VIEW, ABOUT THE BASS LINES? A. THE BASS LINES ARE COMPLETELY DIFFERENT. Q. OKAY. A. THE RYTHYMS AND THE NOTES. Q. AND HOW DO YOU KNOW THE NOTES ARE
13 14 15 16 17 18 19 20 21	Q. LET ME A. THE PUBLIC WOULD ONLY KNOW IT IF I SOMEHOW SAID IT WAS MY IDEA. SO THE ONLY WAY TO MAKE THE SONG MY IDEA WAS TO SAY, "HEY, I WANTED TO DO SOMETHING LIKE THIS AND PHARRELL MADE IT." BUT THE TRUTH WAS PHARRELL MADE IT WITHOUT ME AND HE WAS HE WOULD HAVE MADE IT WITHOUT ME AND I WAS LUCKY TO BE IN THE ROOM. Q. OKAY. SO THAT'S WHY YOU CAME UP WITH THE ELABORATE THE ELABOR ATE STORY THAT	12 13 14 15 16 17 18	TALKED ABOUT EARLIER, IN YOUR VIEW, ABOUT THE BASS LINES? A. THE BASS LINES ARE COMPLETELY DIFFERENT. Q. OKAY. A. THE RYTHYMS AND THE NOTES. Q. AND HOW DO YOU KNOW THE NOTES ARE DIFFERENT IF YOU CAN'T READ MUSIC?
13 14 15 16 17 18 19 20 21 22	Q. LET ME A. THE PUBLIC WOULD ONLY KNOW IT IF I SOMEHOW SAID IT WAS MY IDEA. SO THE ONLY WAY TO MAKE THE SONG MY IDEA WAS TO SAY, "HEY, I WANTED TO DO SOMETHING LIKE THIS AND PHARRELL MADE IT." BUT THE TRUTH WAS PHARRELL MADE IT WITHOUT ME AND HE WAS HE WOULD HAVE MADE IT WITHOUT ME AND I WAS LUCKY TO BE IN THE ROOM. Q. OKAY. SO THAT'S WHY YOU CAME UP WITH THE ELABORATE THE ELABOR ATE STORY THAT YOU	12 13 14 15 16 17 18 19 20	TALKED ABOUT EARLIER, IN YOUR VIEW, ABOUT THE BASS LINES? A. THE BASS LINES ARE COMPLETELY DIFFERENT. Q. OKAY. A. THE RYTHYMS AND THE NOTES. Q. AND HOW DO YOU KNOW THE NOTES ARE DIFFERENT IF YOU CAN'T READ MUSIC? A. BECAUSE I TRAINED MYSELF AND I
13 14 15 16 17 18 19 20 21 22 23	Q. LET ME A. THE PUBLIC WOULD ONLY KNOW IT IF I SOMEHOW SAID IT WAS MY IDEA. SO THE ONLY WAY TO MAKE THE SONG MY IDEA WAS TO SAY, "HEY, I WANTED TO DO SOMETHING LIKE THIS AND PHARRELL MADE IT." BUT THE TRUTH WAS PHARRELL MADE IT WITHOUT ME AND HE WAS HE WOULD HAVE MADE IT WITHOUT ME AND I WAS LUCKY TO BE IN THE ROOM. Q. OKAY. SO THAT'S WHY YOU CAME UP WITH THE ELABORATE THE ELABOR ATE STORY THAT YOU A. YES, BECAUSE I THOUGHT IT WOULD	12 13 14 15 16 17 18 19 20 21	TALKED ABOUT EARLIER, IN YOUR VIEW, ABOUT THE BASS LINES? A. THE BASS LINES ARE COMPLETELY DIFFERENT. Q. OKAY. A. THE RYTHYMS AND THE NOTES. Q. AND HOW DO YOU KNOW THE NOTES ARE DIFFERENT IF YOU CAN'T READ MUSIC? A. BECAUSE I TRAINED MYSELF AND I AND I WRITE AND PRODUCE MUSIC EVERY DAY. SO I CAN
13 14 15 16 17 18 19 20 21 22 23 24	Q. LET ME A. THE PUBLIC WOULD ONLY KNOW IT IF I SOMEHOW SAID IT WAS MY IDEA. SO THE ONLY WAY TO MAKE THE SONG MY IDEA WAS TO SAY, "HEY, I WANTED TO DO SOMETHING LIKE THIS AND PHARRELL MADE IT." BUT THE TRUTH WAS PHARRELL MADE IT WITHOUT ME AND HE WAS HE WOULD HAVE MADE IT WITHOUT ME AND I WAS LUCKY TO BE IN THE ROOM. Q. OKAY. SO THAT'S WHY YOU CAME UP WITH THE ELABORATE THE ELABOR ATE STORY THAT YOU A. YES, BECAUSE I THOUGHT IT WOULD HELP SELL RECORDS.	12 13 14 15 16 17 18 19 20 21	TALKED ABOUT EARLIER, IN YOUR VIEW, ABOUT THE BASS LINES? A. THE BASS LINES ARE COMPLETELY DIFFERENT. Q. OKAY. A. THE RYTHYMS AND THE NOTES. Q. AND HOW DO YOU KNOW THE NOTES ARE DIFFERENT IF YOU CAN'T READ MUSIC? A. BECAUSE I TRAINED MYSELF AND I AND I WRITE AND PRODUCE MUSIC EVERY DAY, SO I CAN SING BASS LINES AND I CAN I CAN HAVE AND I
13 14 15 16 17 18 19 20 21 22 23	Q. LET ME A. THE PUBLIC WOULD ONLY KNOW IT IF I SOMEHOW SAID IT WAS MY IDEA. SO THE ONLY WAY TO MAKE THE SONG MY IDEA WAS TO SAY, "HEY, I WANTED TO DO SOMETHING LIKE THIS AND PHARRELL MADE IT." BUT THE TRUTH WAS PHARRELL MADE IT WITHOUT ME AND HE WAS HE WOULD HAVE MADE IT WITHOUT ME AND I WAS LUCKY TO BE IN THE ROOM. Q. OKAY. SO THAT'S WHY YOU CAME UP WITH THE ELABORATE THE ELABOR ATE STORY THAT YOU A. YES, BECAUSE I THOUGHT IT WOULD	12 13 14 15 16 17 18 19 20 21 22 23	TALKED ABOUT EARLIER, IN YOUR VIEW, ABOUT THE BASS LINES? A. THE BASS LINES ARE COMPLETELY DIFFERENT. Q. OKAY. A. THE RYTHYMS AND THE NOTES. Q. AND HOW DO YOU KNOW THE NOTES ARE DIFFERENT IF YOU CAN'T READ MUSIC? A. BECAUSE I TRAINED MYSELF AND I AND I WRITE AND PRODUCE MUSIC EVERY DAY. SO I CAN SING BASS LINES AND I CAN I CAN HAVE AND I SING GUITAR LINES.
13 14 15 16 17 18 19 20 21 22 23 24	Q. LET ME A. THE PUBLIC WOULD ONLY KNOW IT IF I SOMEHOW SAID IT WAS MY IDEA. SO THE ONLY WAY TO MAKE THE SONG MY IDEA WAS TO SAY, "HEY, I WANTED TO DO SOMETHING LIKE THIS AND PHARRELL MADE IT." BUT THE TRUTH WAS PHARRELL MADE IT WITHOUT ME AND HE WAS HE WOULD HAVE MADE IT WITHOUT ME AND I WAS LUCKY TO BE IN THE ROOM. Q. OKAY. SO THAT'S WHY YOU CAME UP WITH THE ELABORATE THE ELABOR ATE STORY THAT YOU A. YES, BECAUSE I THOUGHT IT WOULD HELP SELL RECORDS. I THOUGHT THAT IT BEING MY SONG	12 13 14 15 16 17 18 19 20 21 22 23 24	TALKED ABOUT EARLIER, IN YOUR VIEW, ABOUT THE BASS LINES? A. THE BASS LINES ARE COMPLETELY DIFFERENT. Q. OKAY. A. THE RYTHYMS AND THE NOTES. Q. AND HOW DO YOU KNOW THE NOTES ARE DIFFERENT IF YOU CAN'T READ MUSIC? A. BECAUSE I TRAINED MYSELF AND I AND I WRITE AND PRODUCE MUSIC EVERY DAY. SO I CAN SING BASS LINES AND I CAN I CAN HAVE AND I SING GUITAR LINES. ALL THE MUSIC THAT'S CREATED BY MY MUSICIANS ARE PARTS THAT I SING TO THEM.
13 14 15 16 17 18 19 20 21 22 23 24	Q. LET ME A. THE PUBLIC WOULD ONLY KNOW IT IF I SOMEHOW SAID IT WAS MY IDEA. SO THE ONLY WAY TO MAKE THE SONG MY IDEA WAS TO SAY, "HEY, I WANTED TO DO SOMETHING LIKE THIS AND PHARRELL MADE IT." BUT THE TRUTH WAS PHARRELL MADE IT WITHOUT ME AND HE WAS HE WOULD HAVE MADE IT WITHOUT ME AND I WAS LUCKY TO BE IN THE ROOM. Q. OKAY. SO THAT'S WHY YOU CAME UP WITH THE ELABORATE THE ELABOR ATE STORY THAT YOU A. YES, BECAUSE I THOUGHT IT WOULD HELP SELL RECORDS.	12 13 14 15 16 17 18 19 20 21 22 23 24	TALKED ABOUT EARLIER, IN YOUR VIEW, ABOUT THE BASS LINES? A. THE BASS LINES ARE COMPLETELY DIFFERENT. Q. OKAY. A. THE RYTHYMS AND THE NOTES. Q. AND HOW DO YOU KNOW THE NOTES ARE DIFFERENT IF YOU CAN'T READ MUSIC? A. BECAUSE I TRAINED MYSELF AND I AND I WRITE AND PRODUCE MUSIC EVERY DAY. SO I CAN SING BASS LINES AND I CAN I CAN HAVE AND I SING GUITAR LINES. ALL THE MUSIC THAT'S CREATED BY MY



Kelli Norden and Associates Court Reporters 310.820.7733 phone 310.820.7933 fax 1833 W. Olympic Boulevard Suite 6801 Los Angeles, California 90064 kna8kellinorden.com www.kellinorden.com

1	SO RECALISE OF MY MY TRAINED FAR		0. 0/4/
2	SO BECAUSE OF MY MY TRAINED EAR, I'M ABLE TO KNOW IMMEDIATELY THE DIFFERENCE	1 2	Q. OKAY.
3	BETWEEN TWO NOTES AND TWO CHORDS.	1	A. AND THE ANSWER IS NO, THERE WAS
4	Q. OKAY, AND ARE THERE ANY CHORD	3	ABSOLUTELY NO DESIRE,
5		4	Q. OKAY, WHAT IS THE WHAT IS THE
6	PROGRESSIONS AT ALL THAT ARE REMOTELY THE SAME	5	HOOK, IN YOUR VIEW, OF BLURRED LINES?
_	BETWEEN "GOT TO GIVE IT UP" AND BLURRED LINES?	6	A. "SHE'S A GOOD GIRL, I KNOW YOU
7	A. NO.	7	WANT IT. I KNOW YOU WANT IT."
8	Q. OKAY. AND AS WE TALKED ABOUT	8	Q. OKAY.
9	EARLIER, THEY DO NOT SHARE ANY OF THE SAME	9	A. THAT THAT WOULD BE THE HOOK.
10	SYNCOPATION?	10	Q. WHAT DID YOU ADD TO THE VOCALS OR
11	A. SYNCOPATION OF WHICH INSTRUMENT?	11	INSTRUMENTALS?
12	Q. YOU TELL ME. IS THERE ANYTHING	12	A. I ADDED NOTHING TO THE
13	THAT YOU BELIEVE THE SYNCOPATION IS SIMILAR?	13	INSTRUMENTALS.
14	A. THE KICK DRUM.	14	VOCALLY, ALL THE VOCALS ARE MINE
15	Q. OKAY. IS THAT IT?	15	EXCEPT FOR PHARRELL DOING SOME "HEY" AND
16	A. YES.	16	"EVERYBODY GET UP." HE SAYS "EVERYBODY GET UP"
17	Q. OKAY,	17	AND HE AND HE DOES SOME "HEYS" AND LIKE TALKING
18	A. BECAUSE IT'S ONE, TWO, THREE, FOUR,	18	IN LITTLE SPOTS. BUT ALL THE OTHER VOCALS ARE
19	AS IS 90 PERCENT OF POP SONGS ON THE RADIO.	19	MINE,
20	Q. OKAY. DID YOU DECIDE TO ADD	20	Q. OKAY. WAS IT YOUR IDEA TO SING A
21	HARMONY TO THE BACKUP VOCALS EACH TIME YOU USED	21	FALSETTO?
22	THE WORD "GOOD GIRL"?	22	A. NO. IT WAS MY IDEA TO DO FALSETTO
23	A. I I RECALL THAT THAT WAS MY	23	IN THE SECOND VERSE WITH A DIFFERENT MELODY FROM
24	IDEA; THAT PHARRELL CAME UP WITH THE CHORUS. HE	24	THE FIRST VERSE,
25	SAID, "SHE'S A GOOD GIRL. I KNOW YOU YOU WANT	25	THE FIRST VERSE WAS ALREADY
	90		92
1	IT." I REMEMBER THE FACE: "I KNOW YOU WANT IT,"		
2	LIKE THAT.	1	FALSETTO; HOWEVER, PHARRELL SINGS A LITTLE HIGHER
		2	THAN ME. SO IF HE MIGHT HAVE SANG THE VERSE TO
3 4	AND THEN I WENT IN AND I SAID, "OH,	3	ME IN HIS REGULAR VOICE AND THEN I SAID, "I HAVE
	THAT'S AMAZING." I WENT IN AND I PUT IT DOWN AND	4	
		ł	TO DO THAT IN FALSETTO."
5	THEN I STARTED ADDING THE HARMONIES. I BELIEVE	5	"IF YOU CAN'T HEAR WHAT I'M TRYING
6	THE HARMONIES WERE MY IDEA.	5 6	"IF YOU CAN'T HEAR WHAT I'M TRYING TO SAY." THAT WOULD HAVE MIGHT THAT THAT
6 7	THE HARMONIES WERE MY IDEA. Q. WHY DID YOU DECIDE TO ADD HARMONY	5 6 7	"IF YOU CAN'T HEAR WHAT I'M TRYING TO SAY." THAT WOULD HAVE MIGHT THAT MIGHT HAVE BEEN SOMETHING HE CAN SING IN HIS
6 7 8	THE HARMONIES WERE MY IDEA. Q. WHY DID YOU DECIDE TO ADD HARMONY TO THE BACKUP VOICES EACH TIME YOU USED THE WORD	5 6 7 8	"IF YOU CAN'T HEAR WHAT I'M TRYING TO SAY." THAT WOULD HAVE MIGHT THAT THAT MIGHT HAVE BEEN SOMETHING HE CAN SING IN HIS REGULAR VOICE AND I MIGHT HAVE HAD TO CHANGE IT TO
6 7 8 9	THE HARMONIES WERE MY IDEA. Q. WHY DID YOU DECIDE TO ADD HARMONY TO THE BACKUP VOICES EACH TIME YOU USED THE WORD "GOOD GIRL"?	5 6 7	"IF YOU CAN'T HEAR WHAT I'M TRYING TO SAY." THAT WOULD HAVE MIGHT THAT MIGHT HAVE BEEN SOMETHING HE CAN SING IN HIS
6 7 8 9	THE HARMONIES WERE MY IDEA. Q. WHY DID YOU DECIDE TO ADD HARMONY TO THE BACKUP VOICES EACH TIME YOU USED THE WORD "GOOD GIRL"? A. BECAUSE I WANTED IT TO HAVE LIKE	5 6 7 8 9	"IF YOU CAN'T HEAR WHAT I'M TRYING TO SAY." THAT WOULD HAVE MIGHT THAT THAT MIGHT HAVE BEEN SOMETHING HE CAN SING IN HIS REGULAR VOICE AND I MIGHT HAVE HAD TO CHANGE IT TO FALSETTO SO IT FIT MY VOICE. Q. OKAY.
6 7 8 9 10	THE HARMONIES WERE MY IDEA. Q. WHY DID YOU DECIDE TO ADD HARMONY TO THE BACKUP VOICES EACH TIME YOU USED THE WORD "GOOD GIRL"? A. BECAUSE I WANTED IT TO HAVE LIKE A ALMOST A DAVID BOWIE-ESQUE ROCK AND ROLL KIND	5 6 7 8 9 10	"IF YOU CAN'T HEAR WHAT I'M TRYING TO SAY." THAT WOULD HAVE MIGHT THAT THAT MIGHT HAVE BEEN SOMETHING HE CAN SING IN HIS REGULAR VOICE AND I MIGHT HAVE HAD TO CHANGE IT TO FALSETTO SO IT FIT MY VOICE. Q. OKAY. A. THE ONLY PART OF THE SONG I
6 7 8 9 10 11 12	THE HARMONIES WERE MY IDEA. Q. WHY DID YOU DECIDE TO ADD HARMONY TO THE BACKUP VOICES EACH TIME YOU USED THE WORD "GOOD GIRL"? A. BECAUSE I WANTED IT TO HAVE LIKE A ALMOST A DAVID BOWIE-ESQUE ROCK AND ROLL KIND OF A HARMONY. THAT'S WHY IT GOES "GOOD GIRL."	5 6 7 8 9 10 11 12	"IF YOU CAN'T HEAR WHAT I'M TRYING TO SAY." THAT WOULD HAVE MIGHT THAT THAT MIGHT HAVE BEEN SOMETHING HE CAN SING IN HIS REGULAR VOICE AND I MIGHT HAVE HAD TO CHANGE IT TO FALSETTO SO IT FIT MY VOICE. Q. OKAY. A. THE ONLY PART OF THE SONG I REMEMBER COMING UP WITH IS THE SECOND VERSE
6 7 8 9 10 11 12 13	THE HARMONIES WERE MY IDEA. Q. WHY DID YOU DECIDE TO ADD HARMONY TO THE BACKUP VOICES EACH TIME YOU USED THE WORD "GOOD GIRL"? A. BECAUSE I WANTED IT TO HAVE LIKE A ALMOST A DAVID BOWIE-ESQUE ROCK AND ROLL KIND OF A HARMONY. THAT'S WHY IT GOES "GOOD GIRL." IT'S A LITTLE IT'S MORE HUMOROUS THAN IT IS	5 6 7 8 9 10	"IF YOU CAN'T HEAR WHAT I'M TRYING TO SAY." THAT WOULD HAVE MIGHT THAT THAT MIGHT HAVE BEEN SOMETHING HE CAN SING IN HIS REGULAR VOICE AND I MIGHT HAVE HAD TO CHANGE IT TO FALSETTO SO IT FIT MY VOICE. Q. OKAY. A. THE ONLY PART OF THE SONG I REMEMBER COMING UP WITH IS THE SECOND VERSE MELODY. OTHERWISE, HE GENIUSED THE WHOLE THING.
6 7 8 9 10 11 12 13	THE HARMONIES WERE MY IDEA. Q. WHY DID YOU DECIDE TO ADD HARMONY TO THE BACKUP VOICES EACH TIME YOU USED THE WORD "GOOD GIRL"? A. BECAUSE I WANTED IT TO HAVE LIKE A ALMOST A DAVID BOWIE-ESQUE ROCK AND ROLL KIND OF A HARMONY. THAT'S WHY IT GOES "GOOD GIRL." IT'S A LITTLE IT'S MORE HUMOROUS THAN IT IS POWERFUL.	5 6 7 8 9 10 11 12	"IF YOU CAN'T HEAR WHAT I'M TRYING TO SAY." THAT WOULD HAVE MIGHT THAT THAT MIGHT HAVE BEEN SOMETHING HE CAN SING IN HIS REGULAR VOICE AND I MIGHT HAVE HAD TO CHANGE IT TO FALSETTO SO IT FIT MY VOICE. Q. OKAY. A. THE ONLY PART OF THE SONG I REMEMBER COMING UP WITH IS THE SECOND VERSE
6 7 8 9 10 11 12 13 14 15	THE HARMONIES WERE MY IDEA. Q. WHY DID YOU DECIDE TO ADD HARMONY TO THE BACKUP VOICES EACH TIME YOU USED THE WORD "GOOD GIRL"? A. BECAUSE I WANTED IT TO HAVE LIKE A ALMOST A DAVID BOWIE-ESQUE ROCK AND ROLL KIND OF A HARMONY. THAT'S WHY IT GOES "GOOD GIRL." IT'S A LITTLE IT'S MORE HUMOROUS THAN IT IS POWERFUL, Q. DOES IT HAVE DOES THAT HAVE	5 6 7 8 9 10 11 12 13	"IF YOU CAN'T HEAR WHAT I'M TRYING TO SAY." THAT WOULD HAVE MIGHT THAT THAT MIGHT HAVE BEEN SOMETHING HE CAN SING IN HIS REGULAR VOICE AND I MIGHT HAVE HAD TO CHANGE IT TO FALSETTO SO IT FIT MY VOICE. Q. OKAY. A. THE ONLY PART OF THE SONG I REMEMBER COMING UP WITH IS THE SECOND VERSE MELODY. OTHERWISE, HE GENIUSED THE WHOLE THING.
6 7 8 9 10 11 12 13 14 15	THE HARMONIES WERE MY IDEA. Q. WHY DID YOU DECIDE TO ADD HARMONY TO THE BACKUP VOICES EACH TIME YOU USED THE WORD "GOOD GIRL"? A. BECAUSE I WANTED IT TO HAVE LIKE A ALMOST A DAVID BOWIE-ESQUE ROCK AND ROLL KIND OF A HARMONY. THAT'S WHY IT GOES "GOOD GIRL." IT'S A LITTLE IT'S MORE HUMOROUS THAN IT IS POWERFUL, Q. DOES IT HAVE DOES THAT HAVE DOES DOES THE USE OF HARMONY TO THE BACK TO	5 6 7 8 9 10 11 12 13 14	"IF YOU CAN'T HEAR WHAT I'M TRYING TO SAY." THAT WOULD HAVE MIGHT THAT THAT MIGHT HAVE BEEN SOMETHING HE CAN SING IN HIS REGULAR VOICE AND I MIGHT HAVE HAD TO CHANGE IT TO FALSETTO SO IT FIT MY VOICE. Q. OKAY. A. THE ONLY PART OF THE SONG I REMEMBER COMING UP WITH IS THE SECOND VERSE MELODY. OTHERWISE, HE GENIUSED THE WHOLE THING. Q. YOU JUST SAID A SECOND AGO THAT
6 7 8 9 10 11 12 13 14 15 16	THE HARMONIES WERE MY IDEA. Q. WHY DID YOU DECIDE TO ADD HARMONY TO THE BACKUP VOICES EACH TIME YOU USED THE WORD "GOOD GIRL"? A. BECAUSE I WANTED IT TO HAVE LIKE A ALMOST A DAVID BOWIE-ESQUE ROCK AND ROLL KIND OF A HARMONY. THAT'S WHY IT GOES "GOOD GIRL." IT'S A LITTLE IT'S MORE HUMOROUS THAN IT IS POWERFUL, Q. DOES IT HAVE DOES THAT HAVE DOES DOES THE USE OF HARMONY TO THE BACK TO THE BACKUP VOICES EACH TIME YOU USED THE WORD	5 6 7 8 9 10 11 12 13 14 15	"IF YOU CAN'T HEAR WHAT I'M TRYING TO SAY." THAT WOULD HAVE MIGHT THAT THAT MIGHT HAVE BEEN SOMETHING HE CAN SING IN HIS REGULAR VOICE AND I MIGHT HAVE HAD TO CHANGE IT TO FALSETTO SO IT FIT MY VOICE. Q. OKAY. A. THE ONLY PART OF THE SONG I REMEMBER COMING UP WITH IS THE SECOND VERSE MELODY. OTHERWISE, HE GENIUSED THE WHOLE THING. Q. YOU JUST SAID A SECOND AGO THAT THERE IS NO HARMONY ON THE VOCAL LINES IN "GOT TO
6 7 8 9 10 11 12 13 14 15 16 17	THE HARMONIES WERE MY IDEA. Q. WHY DID YOU DECIDE TO ADD HARMONY TO THE BACKUP VOICES EACH TIME YOU USED THE WORD "GOOD GIRL"? A. BECAUSE I WANTED IT TO HAVE LIKE A ALMOST A DAVID BOWIE-ESQUE ROCK AND ROLL KIND OF A HARMONY. THAT'S WHY IT GOES "GOOD GIRL." IT'S A LITTLE IT'S MORE HUMOROUS THAN IT IS POWERFUL, Q. DOES IT HAVE DOES THAT HAVE DOES DOES THE USE OF HARMONY TO THE BACK TO THE BACKUP VOICES EACH TIME YOU USED THE WORD "GOOD GIRL" HAVE ANYTHING TO DO WITH AN INTENT TO	5 6 7 8 9 10 11 12 13 14 15	"IF YOU CAN'T HEAR WHAT I'M TRYING TO SAY." THAT WOULD HAVE MIGHT THAT THAT MIGHT HAVE BEEN SOMETHING HE CAN SING IN HIS REGULAR VOICE AND I MIGHT HAVE HAD TO CHANGE IT TO FALSETTO SO IT FIT MY VOICE. Q. OKAY. A. THE ONLY PART OF THE SONG I REMEMBER COMING UP WITH IS THE SECOND VERSE MELODY. OTHERWISE, HE GENIUSED THE WHOLE THING. Q. YOU JUST SAID A SECOND AGO THAT THERE IS NO HARMONY ON THE VOCAL LINES IN "GOT TO GIVE IT UP." A. I CORRECTED MYSELF Q. OKAY.
6 7 8 9 10 11 12 13 14 15 16 17 18	THE HARMONIES WERE MY IDEA. Q. WHY DID YOU DECIDE TO ADD HARMONY TO THE BACKUP VOICES EACH TIME YOU USED THE WORD "GOOD GIRL"? A. BECAUSE I WANTED IT TO HAVE LIKE A ALMOST A DAVID BOWIE-ESQUE ROCK AND ROLL KIND OF A HARMONY. THAT'S WHY IT GOES "GOOD GIRL." IT'S A LITTLE IT'S MORE HUMOROUS THAN IT IS POWERFUL, Q. DOES IT HAVE DOES THAT HAVE DOES DOES THE USE OF HARMONY TO THE BACK TO THE BACKUP VOICES EACH TIME YOU USED THE WORD "GOOD GIRL" HAVE ANYTHING TO DO WITH AN INTENT TO REPLICATE "GOT TO GIVE IT UP"?	5 6 7 8 9 10 11 12 13 14 15 16	"IF YOU CAN'T HEAR WHAT I'M TRYING TO SAY." THAT WOULD HAVE MIGHT THAT THAT MIGHT HAVE BEEN SOMETHING HE CAN SING IN HIS REGULAR VOICE AND I MIGHT HAVE HAD TO CHANGE IT TO FALSETTO SO IT FIT MY VOICE. Q. OKAY. A. THE ONLY PART OF THE SONG I REMEMBER COMING UP WITH IS THE SECOND VERSE MELODY. OTHERWISE, HE GENIUSED THE WHOLE THING. Q. YOU JUST SAID A SECOND AGO THAT THERE IS NO HARMONY ON THE VOCAL LINES IN "GOT TO GIVE IT UP." A. I CORRECTED MYSELF
6 7 8 9 10 11 12 13 14 15 16 17 18 19 20	THE HARMONIES WERE MY IDEA. Q. WHY DID YOU DECIDE TO ADD HARMONY TO THE BACKUP VOICES EACH TIME YOU USED THE WORD "GOOD GIRL"? A. BECAUSE I WANTED IT TO HAVE LIKE A ALMOST A DAVID BOWIE-ESQUE ROCK AND ROLL KIND OF A HARMONY. THAT'S WHY IT GOES "GOOD GIRL." IT'S A LITTLE IT'S MORE HUMOROUS THAN IT IS POWERFUL, Q. DOES IT HAVE DOES THAT HAVE DOES DOES THE USE OF HARMONY TO THE BACK TO THE BACKUP VOICES EACH TIME YOU USED THE WORD "GOOD GIRL" HAVE ANYTHING TO DO WITH AN INTENT TO REPLICATE "GOT TO GIVE IT UP"? A. AS FAR TO MY KNOWLEDGE, THERE	5 6 7 8 9 10 11 12 13 14 15 16 17	"IF YOU CAN'T HEAR WHAT I'M TRYING TO SAY." THAT WOULD HAVE MIGHT THAT THAT MIGHT HAVE BEEN SOMETHING HE CAN SING IN HIS REGULAR VOICE AND I MIGHT HAVE HAD TO CHANGE IT TO FALSETTO SO IT FIT MY VOICE. Q. OKAY. A. THE ONLY PART OF THE SONG I REMEMBER COMING UP WITH IS THE SECOND VERSE MELODY. OTHERWISE, HE GENIUSED THE WHOLE THING. Q. YOU JUST SAID A SECOND AGO THAT THERE IS NO HARMONY ON THE VOCAL LINES IN "GOT TO GIVE IT UP." A. I CORRECTED MYSELF Q. OKAY.
6 7 8 9 10 11 12 13 14 15 16 17 18	THE HARMONIES WERE MY IDEA. Q. WHY DID YOU DECIDE TO ADD HARMONY TO THE BACKUP VOICES EACH TIME YOU USED THE WORD "GOOD GIRL"? A. BECAUSE I WANTED IT TO HAVE LIKE A ALMOST A DAVID BOWIE-ESQUE ROCK AND ROLL KIND OF A HARMONY. THAT'S WHY IT GOES "GOOD GIRL." IT'S A LITTLE IT'S MORE HUMOROUS THAN IT IS POWERFUL, Q. DOES IT HAVE DOES THAT HAVE DOES DOES THE USE OF HARMONY TO THE BACK TO THE BACKUP VOICES EACH TIME YOU USED THE WORD "GOOD GIRL" HAVE ANYTHING TO DO WITH AN INTENT TO REPLICATE "GOT TO GIVE IT UP"?	5 6 7 8 9 10 11 12 13 14 15 16 17 18	"IF YOU CAN'T HEAR WHAT I'M TRYING TO SAY." THAT WOULD HAVE MIGHT THAT THAT MIGHT HAVE BEEN SOMETHING HE CAN SING IN HIS REGULAR VOICE AND I MIGHT HAVE HAD TO CHANGE IT TO FALSETTO SO IT FIT MY VOICE. Q. OKAY. A. THE ONLY PART OF THE SONG I REMEMBER COMING UP WITH IS THE SECOND VERSE MELODY. OTHERWISE, HE GENIUSED THE WHOLE THING. Q. YOU JUST SAID A SECOND AGO THAT THERE IS NO HARMONY ON THE VOCAL LINES IN "GOT TO GIVE IT UP." A. I CORRECTED MYSELF Q. OKAY. A RIGHT AFTER THAT, YEAH. OKAY.
6 7 8 9 10 11 12 13 14 15 16 17 18 19 20	THE HARMONIES WERE MY IDEA. Q. WHY DID YOU DECIDE TO ADD HARMONY TO THE BACKUP VOICES EACH TIME YOU USED THE WORD "GOOD GIRL"? A. BECAUSE I WANTED IT TO HAVE LIKE A ALMOST A DAVID BOWIE-ESQUE ROCK AND ROLL KIND OF A HARMONY. THAT'S WHY IT GOES "GOOD GIRL." IT'S A LITTLE IT'S MORE HUMOROUS THAN IT IS POWERFUL, Q. DOES IT HAVE DOES THAT HAVE DOES DOES THE USE OF HARMONY TO THE BACK TO THE BACKUP VOICES EACH TIME YOU USED THE WORD "GOOD GIRL" HAVE ANYTHING TO DO WITH AN INTENT TO REPLICATE "GOT TO GIVE IT UP"? A. AS FAR TO MY KNOWLEDGE, THERE	5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20	"IF YOU CAN'T HEAR WHAT I'M TRYING TO SAY." THAT WOULD HAVE MIGHT THAT THAT MIGHT HAVE BEEN SOMETHING HE CAN SING IN HIS REGULAR VOICE AND I MIGHT HAVE HAD TO CHANGE IT TO FALSETTO SO IT FIT MY VOICE. Q. OKAY. A. THE ONLY PART OF THE SONG I REMEMBER COMING UP WITH IS THE SECOND VERSE MELODY. OTHERWISE, HE GENIUSED THE WHOLE THING. Q. YOU JUST SAID A SECOND AGO THAT THERE IS NO HARMONY ON THE VOCAL LINES IN "GOT TO GIVE IT UP." A. I CORRECTED MYSELF Q. OKAY. A RIGHT AFTER THAT, YEAH. OKAY. Q. I THINK YOU MENTIONED ONE THING.
6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21	THE HARMONIES WERE MY IDEA. Q. WHY DID YOU DECIDE TO ADD HARMONY TO THE BACKUP VOICES EACH TIME YOU USED THE WORD "GOOD GIRL"? A. BECAUSE I WANTED IT TO HAVE LIKE A ALMOST A DAVID BOWIE-ESQUE ROCK AND ROLL KIND OF A HARMONY. THAT'S WHY IT GOES "GOOD GIRL." IT'S A LITTLE IT'S MORE HUMOROUS THAN IT IS POWERFUL, Q. DOES IT HAVE DOES THAT HAVE DOES DOES THE USE OF HARMONY TO THE BACK TO THE BACKUP VOICES EACH TIME YOU USED THE WORD "GOOD GIRL" HAVE ANYTHING TO DO WITH AN INTENT TO REPLICATE "GOT TO GIVE IT UP"? A. AS FAR TO MY KNOWLEDGE, THERE ARE NO HARMONIES IN "GOT TO GIVE IT UP."	5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21	"IF YOU CAN'T HEAR WHAT I'M TRYING TO SAY." THAT WOULD HAVE MIGHT THAT THAT MIGHT HAVE BEEN SOMETHING HE CAN SING IN HIS REGULAR VOICE AND I MIGHT HAVE HAD TO CHANGE IT TO FALSETTO SO IT FIT MY VOICE. Q. OKAY. A. THE ONLY PART OF THE SONG I REMEMBER COMING UP WITH IS THE SECOND VERSE MELODY. OTHERWISE, HE GENIUSED THE WHOLE THING. Q. YOU JUST SAID A SECOND AGO THAT THERE IS NO HARMONY ON THE VOCAL LINES IN "GOT TO GIVE IT UP." A. I CORRECTED MYSELF Q. OKAY. A RIGHT AFTER THAT, YEAH. OKAY. Q. I THINK YOU MENTIONED ONE THING. A. I MENTIONED THE ENDING, YES
6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22	THE HARMONIES WERE MY IDEA. Q. WHY DID YOU DECIDE TO ADD HARMONY TO THE BACKUP VOICES EACH TIME YOU USED THE WORD "GOOD GIRL"? A. BECAUSE I WANTED IT TO HAVE LIKE A ALMOST A DAVID BOWIE-ESQUE ROCK AND ROLL KIND OF A HARMONY. THAT'S WHY IT GOES "GOOD GIRL." IT'S A LITTLE IT'S MORE HUMOROUS THAN IT IS POWERFUL, Q. DOES IT HAVE DOES THAT HAVE DOES DOES THE USE OF HARMONY TO THE BACK TO THE BACKUP VOICES EACH TIME YOU USED THE WORD "GOOD GIRL" HAVE ANYTHING TO DO WITH AN INTENT TO REPLICATE "GOT TO GIVE IT UP"? A. AS FAR TO MY KNOWLEDGE, THERE ARE NO HARMONIES IN "GOT TO GIVE IT UP," Q. OKAY.	5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22	"IF YOU CAN'T HEAR WHAT I'M TRYING TO SAY." THAT WOULD HAVE MIGHT THAT THAT MIGHT HAVE BEEN SOMETHING HE CAN SING IN HIS REGULAR VOICE AND I MIGHT HAVE HAD TO CHANGE IT TO FALSETTO SO IT FIT MY VOICE. Q. OKAY. A. THE ONLY PART OF THE SONG I REMEMBER COMING UP WITH IS THE SECOND VERSE MELODY. OTHERWISE, HE GENIUSED THE WHOLE THING. Q. YOU JUST SAID A SECOND AGO THAT THERE IS NO HARMONY ON THE VOCAL LINES IN "GOT TO GIVE IT UP." A. I CORRECTED MYSELF Q. OKAY. A RIGHT AFTER THAT, YEAH. OKAY. Q. I THINK YOU MENTIONED ONE THING. A. I MENTIONED THE ENDING, YES Q. RIGHT.
6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23	THE HARMONIES WERE MY IDEA. Q. WHY DID YOU DECIDE TO ADD HARMONY TO THE BACKUP VOICES EACH TIME YOU USED THE WORD "GOOD GIRL"? A. BECAUSE I WANTED IT TO HAVE LIKE A ALMOST A DAVID BOWIE-ESQUE ROCK AND ROLL KIND OF A HARMONY. THAT'S WHY IT GOES "GOOD GIRL." IT'S A LITTLE IT'S MORE HUMOROUS THAN IT IS POWERFUL, Q. DOES IT HAVE DOES THAT HAVE DOES DOES THE USE OF HARMONY TO THE BACK TO THE BACKUP VOICES EACH TIME YOU USED THE WORD "GOOD GIRL" HAVE ANYTHING TO DO WITH AN INTENT TO REPLICATE "GOT TO GIVE IT UP"? A. AS FAR TO MY KNOWLEDGE, THERE ARE NO HARMONIES IN "GOT TO GIVE IT UP," Q. OKAY. A. OH, WAIT. WAIT. NO. THE THE	5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23	"IF YOU CAN'T HEAR WHAT I'M TRYING TO SAY." THAT WOULD HAVE MIGHT THAT THAT MIGHT HAVE BEEN SOMETHING HE CAN SING IN HIS REGULAR VOICE AND I MIGHT HAVE HAD TO CHANGE IT TO FALSETTO SO IT FIT MY VOICE. Q. OKAY. A. THE ONLY PART OF THE SONG I REMEMBER COMING UP WITH IS THE SECOND VERSE MELODY. OTHERWISE, HE GENIUSED THE WHOLE THING. Q. YOU JUST SAID A SECOND AGO THAT THERE IS NO HARMONY ON THE VOCAL LINES IN "GOT TO GIVE IT UP." A. I CORRECTED MYSELF Q. OKAY. A RIGHT AFTER THAT, YEAH. OKAY. Q. I THINK YOU MENTIONED ONE THING. A. I MENTIONED THE ENDING, YES Q. RIGHT. A THE VAMP, YES.
6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23 24	THE HARMONIES WERE MY IDEA. Q. WHY DID YOU DECIDE TO ADD HARMONY TO THE BACKUP VOICES EACH TIME YOU USED THE WORD "GOOD GIRL"? A. BECAUSE I WANTED IT TO HAVE LIKE A ALMOST A DAVID BOWIE-ESQUE ROCK AND ROLL KIND OF A HARMONY. THAT'S WHY IT GOES "GOOD GIRL." IT'S A LITTLE IT'S MORE HUMOROUS THAN IT IS POWERFUL, Q. DOES IT HAVE DOES THAT HAVE DOES DOES THE USE OF HARMONY TO THE BACK TO THE BACKUP VOICES EACH TIME YOU USED THE WORD "GOOD GIRL" HAVE ANYTHING TO DO WITH AN INTENT TO REPLICATE "GOT TO GIVE IT UP"? A. AS FAR TO MY KNOWLEDGE, THERE ARE NO HARMONIES IN "GOT TO GIVE IT UP." Q. OKAY. A. OH, WAIT. WAIT. NO. THE THE VAMP GOES "GOT TO GIVE IT UP." THERE'S A TWO-PART	5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23 24	"IF YOU CAN'T HEAR WHAT I'M TRYING TO SAY." THAT WOULD HAVE MIGHT THAT THAT MIGHT HAVE BEEN SOMETHING HE CAN SING IN HIS REGULAR VOICE AND I MIGHT HAVE HAD TO CHANGE IT TO FALSETTO SO IT FIT MY VOICE. Q. OKAY. A. THE ONLY PART OF THE SONG I REMEMBER COMING UP WITH IS THE SECOND VERSE MELODY. OTHERWISE, HE GENIUSED THE WHOLE THING. Q. YOU JUST SAID A SECOND AGO THAT THERE IS NO HARMONY ON THE VOCAL LINES IN "GOT TO GIVE IT UP." A. I CORRECTED MYSELF Q. OKAY. A RIGHT AFTER THAT, YEAH. OKAY. Q. I THINK YOU MENTIONED ONE THING. A. I MENTIONED THE ENDING, YES Q. RIGHT. A THE VAMP, YES. Q. BUT I WANT TO ASK YOU: ISN'T IT



Kelli Norden and Associates Court Reporters 310.820.7735 phone 310.820.7935 fax 11835 W. Olympic Boulevard Suite 680B Los Angeles, California 9006+ kna@kellinorden.com

		-	
1	FALSETTO IS A DIFFERENT TYPE OF A VOCAL OF	1	BY MR. BUSCH:
2	VOCAL INSTRUMENTATION.	2	
3	Q. THE PERFORMANCE ELEMENT OF FALSETTO	1	Q. OH, BEFORE LASK YOU QUESTIONS
4	IS AN ARRANGE IS AN ARRANGEMENT CHOICE, NOT	3 4	ABOUT THIS EXHIBIT 35
5	A	1	A. UH-HUH.
6	A. NO.	5	Q. —I HAVE A COUPLE OF QUESTIONS FOR
7	Q MUSICAL NOTATION.	6	YOU.
8	IT'S NOT?	7	A. OKAY.
9	A. NO, IT'S IT'S A IT'S AN	8	Q. DID HAVE YOU AND PHARRELL
10	INSTRUMENTAL CHOICE OF THE VOCAL ABILITY.	9	OKAY. HAVE YOU AND PHARRELL WILLIAMS SPOKEN ABOUT
11	Q. OKAY.	10	THIS CASE?
12	A. IF THAT MAKES SENSE. THE SAME WAY	11	A. NO.
13		12	Q. HAVE YOU AND PHARRELL SPOKEN ABOUT
14	A BARITONE, ALTO, SOPRANO, FALSETTO IS A IS A	13	HIS TESTIMONY IN THIS CASE?
	TYPE IS A WAY WAY OF SINGING.	14	A. NO.
15	Q. OKAY.	15	Q. HAVE YOU BEEN ADVISED BY ANYONE
16	A. THAT IS COMPLETELY NATURAL TO ANY	16	OTHER THAN YOUR ATTORNEY BECAUSE THAT'S
17	VOCALIST. AT LEAST IT WAS TILL I STARTED SMOKING	17	PRIVILEGED INFORMATION THAT I'M NOT ENTITLED TO
18	SO MUCH.	18	KNOW.
19	TYPE IT. TYPE IT IN. GET IT IN	19	A. OKAY.
20	THERE.	20	Q. BUT HAVE YOU BEEN ADVISED BY YOUR
21	Q. DO YOU KNOW HOW MUCH MONEY YOU HAVE	21	ATTORNEY ABOUT WHAT PHARRELL WILLIAMS TESTIFIED IN
22	MADE ON "BLURRED LINES"?	22	THIS CASE WHEN I CONDUCTED A DEPOSITION OF HIM THE
23	A. I HAVE NO IDEA.	23	OTHER DAY?
24	Q. WHO WOULD KNOW THAT INFORMATION?	24	A. NO.
25	A. MAYBE CHRIS, MY MANAGEMENT, MIGHT	25	Q. OKAY. DID YOU SPEAK TO ANYONE IN
	00		
	98		100
1	KNOW OR MY LAWYER LAWE BORERTS BUT NO	.	THE MIODED OF YOUR STREET
2	KNOW, OR MY LAWYER, JAMIE ROBERTS. BUT NO, I DON'T REALLY PAY MUCH ATTENTION TO MY FINANCES.	1	THE WORLD, OUTSIDE OF YOUR ATTORNEYS OR THE
3		2	PRESENCE OF YOUR ATTORNEYS, ABOUT WHAT YOU WOULD
4	Q. OKAY, SO YOU DON'T KNOW THE MECHANICAL ROYALTIES	3	SAY WITH RESPECT TO THE PUBLIC INTERVIEWS YOU GAVE
5	A. NO.	4	WHERE YOU DID SAY THAT WHERE YOU DID REFERENCE
6		5	MARVIN GAYE'S SONG "GOT TO GIVE IT UP"?
i	Q THAT YOU'VE MADE, YOU DON'T KNOW	6	A. NO.
7	THE RECORD ROYALTIES, ARTIST ROYALTIES, NONE OF	7	Q. OKAY.
8	THAT?	8	A. I'VE BEEN BUSY.
9	A. NO, NO IDEA.	9	(WHEREUPON, DEFENDANTS' EXHIBIT NUMBER
10	Q. OKAY. YOU DON'T KNOW	10	35 WAS MARKED FOR IDENTIFICATION BY
11	A. I DON'T EVEN KNOW IF I'VE BEEN PAID	11	THE DEPOSITION OFFICER AND IS ATTACHED
12	FOR IT YET.	12	HERETO.)
13	Q. OKAY. AND AS FAR AS YOU DO REALIZE	13	DEPOSITION OFFICER: THERE YOU GO.
14	THAT IF YOU WERE TO NOT WIN THIS CASE	14	THE DEPONENT: THANK YOU, LOVE,
15	A. UH-HUH.	15	OH, WHEN I WAS - OH, I MISS BEING
16	Q THAT YOUR ABILITY TO RECEIVE	16	SKINNY LIKE THAT. LOOKED GOOD BACK THEN.
17	INCOME FROM "BLURRED LINES" MIGHT BE AFFECTED?	17	BY MR. BUSCH:
18	A. OF COURSE.	18	Q. OKAY. I'M SHOWING YOU NOW AN
19	Q. OKAY. I'M GOING TO MARK AS THE	19	INTERVIEW THAT YOU GAVE WITH "BILLBOARD MAGAZINE,"
20	NEXT EXHIBIT AN INTERVIEW THAT YOU DID WITH	20	A. OKAY.
21	"BILLBOARD MAGAZINE."	21	Q. AND I'M TURNING - GOING TO TURN
22	A. OKAY.	22	YOUR ATTENTION TO THE SECOND PAGE OF THIS
23	MR. BUSCH: MARK THAT AS	23	A. YEP.
24	WHAT NUMBER ARE WE UP TO?	24	Q WHERE YOU SAY LIKE THE FIRST,
25	DEPOSITION OFFICER: 35.	25	SECOND FOURTH LINE
	99		101



Kelli Norden and Associates Court Reporters 310.820.7733 phone 310.820.7933 fex 11835 W. Olympic Bauleverd Suite 680t Los Angeles, California 90064 kna®kellinorden.com www.kéllinorden.com

	A		
1	A UH-HUH.	1	REMEMBER SAYING, BUT I DO GENERALLY REMEMBER
2	Q DOWN FOURTH PARAGRAPH DOWN, I	2	TRYING TO SELL SELL THE PUBLIC ON THE FACT THAT
3	SHOULD	3	"BLURRED LINES" WAS MY IDEA IN SOME WAY.
4	A GOT IT.	4	Q. AND THAT IT WAS INSPIRED BY MARVIN
5	Q SAY, WHERE IT SAYS, QUOTE:	5	GAYE'S "GOT TO GIVE IT UP"?
6	"PHARRELL AND I WERE IN	6	A. AND THAT IT WAS YES, BECAUSE
7	THE STUDIO, MAKING A COUPLE OF	7	AFTER BECAUSE BECAUSE AFTER PEOPLE CONNECTED
8	RECORDS, AND THEN ON THE THIRD	8	THE TWO, I WAS LIKE, "YEAH, YOU KNOW, WE WERE I
9	DAY, I TOLD HIM I WANTED TO DO	9	WANTED TO MAKE SOMETHING LIKE THAT," BUT
10	SOMETHING KIND OF LIKE MARVIN	10	Q. OKAY. BUT THAT WAS NOT TRUE?
11	GAYE'S 'GOT TO GIVE IT UP,' THAT	11	A. I CAN'T TAKE CREDIT FOR THAT, NO.
12	KIND OF FEEL, BECAUSE IT'S ONE	12	Q. SO JUST SO WE'RE CLEAR, THE PARTS
13	OF MY FAVORITE SONGS OF ALL	13	OF THE INTERVIEW THAT I READ, YOU'RE NOT DENYING
14	TIME. SO HE STARTEDMESSING	14	THAT YOU SAID?
15	WITH SOME DRUMS AND THEN HE	15	A. I DID I DID SAY THOSE THINGS;
16	STARTED GOING "HEY, HEY, HEY,"	16	HOWEVER, I WOULD LIKE TO RECLARIFY THAT I WAS I
17	AND ABOUT AN HOUR AND A HALF	17	HAD A DRUG AND ALCOHOL PROBLEM FOR THE YEAR AND I
18	LATER, WE HAD THE WHOLE RECORD	18	DIDN'T DO A SOBER INTERVIEW. SO I DON'T RECALL
19	FINISHED."	19	MANY THINGS THAT I SAID.
20	THAT'S NOT TRUE, IS IT?	20	Q. OKAY.
21	A NO.	21	A. IN FACT, I WAS QUITE SURPRISED WHEN
22	Q. IT IS CORRECT THAT THAT'S NOT TRUE?	22	I READ THEM BACK SOMETIMES.
23	A. IT IS CORRECT THAT THAT'S NOT TRUE.	23	MR. BUSCH: ALL RIGHT. LET'S MARK
24	SURE WISH IT WAS MY IDEA.	24	AS THE NEXT EXHIBIT A TRANSCRIPTION OF A VIDEO.
25	Q. WERE ANY REFERENCE RECORDINGS	25	111
	102		104
1	PLAYED IN THE STUDIO SESSION AT THE TIME THAT	1	BY MR. BUSCH:
2	"BLURRED LINES" WAS BEING CREATED?	2	Q. WE HAVE VIDEOS THAT
3	A. NO.	3	A. OKAY,
4	Q. OKAY.	4	Q YOU'VE GIVEN, AND I'M GOING TO
5	A. I MOST MUSICIANS, THEY NEVER	5	MARK AS AN EXHIBIT THE VIDEOS AT SOME AT THE
6	WORK LIKE THAT. I WOULD NEVER YOU NEVER WANT	6	END OF THIS DEPOSITION.
7	OTHER MUSIC WHEN YOU'RE IN THE STUDIO, EVEN IF YOU	7	A. OKAY,
8	WERE TAKE YOU OUT.	8	Q. BUT THIS IS A TRANSCRIPTION OF ONE
9	Q. OKAY, LET'S YOU CAN PUT THAT	9	OF YOUR VIDEO INTERVIEWS, I BELIEVE YES FROM
10	DOCUMENT AWAY.	10	FUSE T.V.
11	A. OKAY.	11	A. OKAY.
12	Q. AND I'M GOING TO MOVE ON TO ANOTHER	12	(WHEREUPON, DEFENDANTS' EXHIBIT NUMBER
13	INTERVIEW THAT YOU GAVE.	13	36 WAS MARKED FOR IDENTIFICATION BY
14	A. OKAY.	14	THE DEPOSITION OFFICER AND IS ATTACHED
15	Q. NOW, I DON'T BELIEVE THAT I ASKED	15	HERETO.)
16	YOU THIS QUESTION, BUT YOU ARE NOT DISPUTING THAT	16	BY MR. BUSCH:
17	YOU SAID THOSE WORDS THAT ARE IN THAT INTERVIEW	17	Q. WERE YOU DRUNK AND ON VICODIN WHEN
18	OR	18	YOU DID THE "OPRAH SHOW"?
19	A. OF COURSE.	19	A. YES.
20	Q OR IN THE PRIOR INTERVIEWS THAT	20	DEPOSITION OFFICER: THIS IS
21	I'VE SHOWED YOU?	21	EXHIBIT 36.
22	A. WITH WITH ALL DUE RESPECT, I WAS	22	BY MR. BUSCH:
23	HIGH AND DRUNK EVERY TIME I DID AN INTERVIEW LAST	23	Q. AND I DON'T MEAN ANY OFFENSE BY
24	YEAR.	24	THIS
25	SO THERE ARE SOME QUOTES I DON'T	25	A. NO. PLEASE,
il	107		405
11	103	i	105



Kelli Norden and Associates Court Reporters 310.820.7733 phone 310.820.7933 fax 11835 W. Olympic Boulevard Suite 680t Los Angeles, California 90064 kna@kellinorden.com

	O DUT DAOED ON THE		
1	Q BUT BASED ON THAT TESTIMONY, I	1	THE DEPONENT: RECOLLECTION.
2	HAVE TO ASK YOU.	2	MR. KING: OBJECT TO FORM.
3	A. YES.	3	BY MR. BUSCH:
4	Q. ARE YOU DRUNK OR ON ANY DRUGS	4	Q. OKAY. WE HAVE A VIDEO OF IT.
5	TODAY?	5	A. OKAY, YEAH. THAT'S HOW YOU CAN
6	A. NO. I'VE I'VE BEEN SOBER FOR	6	SHOW IT, BUT I I DON'T REMEMBER GOING TO FUSE
7	THE LAST TWO MONTHS.	7	T.V.
8	Q. ALL RIGHT.	8	Q. OKAY.
9	A. WHEN YOUR WIFE LEAVES YOU, IT GIVES	9	A. I DON'T EVEN REMEMBER.
10	YOU GOOD REASON TO SOBER UP.	10	Q. WOULD WOULD SEEING THE INTERVIEW
11	Q. OKAY, ALL RIGHT. TAKE A LOOK AT	11	HELP YOU?
12	WHAT I'VE MARKED AS THE NEXT EXHIBIT.	12	A. IF THAT HELPS IF IT GIVES YOU
13	WHAT NUMBER IS THIS, KELLI?	13	(SPEAKING SIMULTANEOUSLY.)
14	DEPOSITION OFFICER: 36,	14	MR. BUSCH: CAN WE SEE THE TRACK
15	BY MR. BUSCH:	15	LISTING, PLEASE.
16	Q. 36. THIS IS A TRANSCRIPTION OF AN	16	THE DEPONENT: I DON'T EVEN
17	INTERVIEW YOU GAVE WITH FUSE T.V. WHERE YOU SAID,	17	REMEMBER VISITING FUSE.
18	QUOTE:	18	
19	"I SAID TO PHARRELL, YOU	19	MR. KING: MAYBE THEY CAME TO YOU.
20	KNOW, I'D LIKE TO DO SOMETHING	20	THE DEPONENT: YEAH, MAYBETHEY
21	LIKE MARVIN GAYE'S 'GOT TO GIVE	1	CAME TO WHERE WE WERE,
22	IT UP,' SOMETHING WITH THAT	21	MR. BUSCH: THE CLIP FUSE IS NUMBER
23	FEEL, AND SO WE JUST STARTED	22	FIVE.
24	MESSING WITH DRUMS. THEN HE	23	MR. KING: FINALLY, I'M GETTING
25	SAID, 'HEY, HEY, HEY' AND I WAS	24	SOME USE OUT OF THIS T.V. I PAID FOR.
~~	GOD, HET, HET, HET AND I WAS	25	MR. BUSCH: I HAVE THIS GUY SITTING
	106		108
1			OVI
1	LIKE, 'I LOVE THAT.' I HOPPED	1	HERE, SO I MIGHT AS WELL PLAY IT.
2	IN THE BOOTH, I PUT THAT DOWN,	2	THE DEPONENT: WE GOT SOME YOU
3	AND THE REST OF THE SONG JUST	3	GOING TO HAVE SOME THROW SOME WORLD CUP
4	CAME FLYING OUT, LIKE ONE LINE	4	PARTIES?
5	AFTER ANOTHER."	5	(WHEREUPON, VIDEO CLIP WAS PLAYED.)
6	A. YOU NOTICE HOW IN EVERY INTERVIEW,	6	BY MR. BUSCH:
7	ALMOST IN ORDER, I START TAKING MORE AND MORE	7	Q. OKAY.
8	CREDIT? THAT NOW I STARTED, "WE STARTED MESSING	8	A. YEAH.
9	WITH THE DRUMS," WHEN I HAD NOTHING TO DO WITH THE	9	Q. SO THAT THAT'S YOU; RIGHT?
10	DRUMS.	10	Q. SO THAT THAT'S YOU; RIGHT? A. YEAH.
11	SO YOU CAN SEE THAT I STARTED I	11	
12	CONTINUED TO TRY TO TAKE MORE AND MORE CREDIT FOR	12	Q. AND YOU DON'T DENY SAYING THOSE
13	THE CREATION OF THIS RECORD.	1	WORDS?
14	Q. OKAY. AND NOTHING	13 14	A. WELL, I CAN'T DENY IT.
15	A. WHICH I CAN'T TAKE.	1	Q. RIGHT.
16	Q. AND YOU DON'T DENY SAYING THIS?	15	A. IMEAN, IT'S
17	A. THIS, I HAVE NO RECOLLECTION OF	16	Q. OKAY.
18	THIS, I HAVE NO RECOLLECTION OF THIS INTERVIEW AT ALL.	17	A. IT'S VISUAL REFERENCE.
19		18	MR. BUSCH: ALL RIGHT, AND WE'RE
20	Q. OKAY. BUT ARE YOU DENYING THAT YOU SAID THESE WORDS?	19	GOING TO MARK WE HAVE ALL THE VIDEO CLIPS ON A
II		20	D.V.D., HOWARD, AND AT THE END OF THIS DEPOSITION
21	A. LAMNOT	21	I'M GOING TO MARK REMIND ME TO MARK THOSE
22	(SPEAKING SIMULTANEOUSLY.)	22	SEPARATELY AS AN EXHIBIT, PLEASE.
23	MR. KING: OBJECTION	23	MR. KING: KELLI, REMIND HIM TO
24	THE DEPONENT: DENYING	24	MARK THOSE AS AN EXHIBIT.
25	MR. KING: OBJECT	25	MR. BUSCH: JUDITH, REMIND ME TO
1	107		
IL	107		109



Kelli Norden and Associates Court Reporters 310.820.7733 phone 310.820.7933 fax 11835 W. Olympic Boulevard Suite 680E Los Angeles, California 90064 kna®kellinorden.com

		,	
,	MADE THEM AC AN EVILIBLE		
1	MARK THEM AS AN EXHIBIT.	1	YOUR VIDEO WITH V.H1, AND THIS IS WHAT YOU WILL
2	THE DEPONENT: CHRIS, REMIND HIM TO	2	SEE IN THE VIDEO YOU SAID.
3	REMIND ME	3	A. OKAY.
4	(LAUGHTER.)	4	Q (READING):
5	BY MR. BUSCH:	5	"WELL, PHARRELL AND I WENT
6	Q. ALL RIGHT.	6	INTHE STUDIO AND, YOU KNOW, I
7	A. YEAH.	7	HAD MENTIONED TO HIM THAT ONE OF
8	Q. ALL RIGHT. LET'S MARK AS THE NEXT	8	MY FAVORTE SONGS OF ALL TIME IS
9	EXHIBIT AN INTERVIEW YOU GAVE WITH V.H1.	9	MARVIN GAYE'S GOT TO GIVE IT
10	A. OKAY.	10	UP.' AND SO WE TRIED TO GET A
11	Q. AND	11	LITTLE GROOVE LIKE THAT GOING.
12	A. I'M GOING TO SWITCH	12	AND THEN WE STARTED DANCING
13	Q AGAIN	13	AROUND THE STUDIO LIKE OLD MEN,
14	A. EXCUSE ME. I AM GOING TO SWITCH MY	14	HOLLERING AT YOUNG GIRLS FROM
15	MIC TO MY T-SHIRT. ALL RIGHT? OKAY.	15	PORCH (SIC), YOU KNOW, LIKE
16	Q. OKAY. THIS IS WE HAVE A VIDEO	16	HEY, HEY, YOU KNOW. WE
17	OF THIS.	17	REALLY WROTE THE WHOLE SONG IN
18	A. OKAY.	18	ABOUT A HALF AN HOUR, BECAUSE
19	MR. BUSCH: DO YOU HAVE THE V.H1	19	ONCE WE HAD A LITTLE TRACK, WE
20	CLIP? JUST A CLIP, V.H1.	20	WENT INTO THE BOOTH TOGETHER,
21	TECHNICIAN: THIS ONE?	21	AND, LIKE, I WOULD SING A LINE
22	MR. BUSCH: NO. IT'S NUMBER SEVEN.	22	AND HE'D GO, 'HEY, HEY, HEY' OR
23	HOLD ON AN SEC. DON'T PLAY IT YET.	23	
24	STOP IT.	24	UH-HUH' OR HE WOULD LIKE, HEY,
25	111	25	GIRL, COME HERE.' YOU KNOW, WE
		45	JUST HAD SUCH A GREAT TIME THAT
	110		112
NO STANCE		***************************************	
1	BY MR, BUSCH:	1	WHEN WE DID THE VIDEO, I WANTED
2	Q. OKAY. WE'RE GOING TO I'M GOING	2	TO MAKE SURE WE KEPT THAT ENERGY
3	TO PLAY THE VIDEO CLIP OF THAT, AND I ALSO HAVE A	3	AND THAT SENSE OF HUMOR. SO I
4	TRANSCRIPTION THAT I'LL MARK AS AN EXHIBIT.	4	HAD PHARRELL DO SOME OLD MEN
5	SO MARK THE TRANSCRIPTION AS THE	5	DANCES. AND WHEN T.I. SHOWED
6	NEXT EXHIBIT.	6	UP, I WAS LIKE, 'HEY, MAN, CAN
7	DEPOSITION OFFICER: THAT'S 37.	7	YOU DO SOME OLD-MAN-LIKE-YOUR-
8	MR. BUSCH: 37.	8	GRANDPA-AT-A-WEDDING KIND OF
9	(WHEREUPON, DEFENDANTS' EXHIBIT NUMBER	9	DANCES,' AND T.I. WENT RIGHT FOR
10	37 WAS MARKED FOR IDENTIFICATION BY	10	IT. HE WAS FEARLESS. HE WENT
11	THE DEPOSITION OFFICER AND IS ATTACHED	11	RIGHT FOR IT. HE GAVE US SOME
12	HERETO.)	12	RED FOX MAGIC."
13	MR. BUSCH: AND BEFORE YOU PLAY IT,	13	A. YES.
14	I WANT TO READ THE RECORD, EXACTLY WHAT IT SAYS,	14	MR. BUSCH: OKAY. SO LET'S PLAY
15	BECAUSE SHE'S NOT GOING TO TAKE DOWN THE VIDEO.	15	THE VIDEO.
16	THE DEPONENT: GOT IT.	16	YES, NUMBER SEVEN.
17	DEPOSITION OFFICER: AND CAN YOU	17	A. NOTICE HOW I KEEP TAKING MORE AND
18	SLOW DOWN A BIT?	18	MORE CREDIT EVERY
19	MR. BUSCH: YES. I'LL TRY.	19	(WHEREUPON, VIDEO CLIP WAS PLAYED.)
20	BY MR. BUSCH:	20	MR. BUSCH: MAKE IT LOUDER, PLEASE.
21	Q. OKAY, ARE YOU READY NOW? DO YOU		
22	HAVE THE DOCUMENT?	21	(CONCLUSION OF VIDEO CLIP.)
23	A. I DON'T HAVE THE DOCUMENT.	22	MR. KING: THAT'S NOT THE WHOLE
24	Q. ALL RIGHT. SO, MR. THICKE, LOOKING	23	CLIP.
25	AT EXHIBIT NUMBER 37, WE HAVE A TRANSCRIPTION OF	24	MR. BUSCH: THAT'S NOT THAT'S
45	AT EXHIBIT NOWIDER 37, WE HAVE A TRANSCRIPTION OF	25	NOT THE WHOLE CLIP.
	111		113



Kelli Norden and Associates Court Reporters 310.820.7733 phone 310.820.7933 fax 11833 W. Olympic Boulevard Suite 680E Los Angales, California 90064 knaekellinorden.com

1	THE DEPONENT: IT DOESN'T MATTER.		O AND ENERGY INC.
2		1	Q AND EVERYTHING THAT YOU SAID IN
3	THE REST OF THE CLIP IS ALL ABOUT THE VIDEO, NOT ABOUT THE SONG.	2	THAT INTERVIEW THAT WE JUST HEARD IS NOT TRUE;
		3	CORRECT?
4	BY MR. BUSCH:	4	A. NO, THAT IS CORRECT, THAT THAT IS
5	Q. OKAY,	5	NOT TRUE.
6	A. WE DON'T WE DON'T NEED TO SHOW	6	Q OKAY.
7	THE REST.	7	THE VIDEOGRAPHER: MR. BUSCH, CAN I
8	Q. ALL RIGHT. SO, MR. THICKE	8	HAVE YOU RAISE YOUR MICROPHONE THERE, SIR.
9	A. YES.	9	IT'S
10	Q WHAT YOU SAID IN THAT V.H1	10	MR. BUSCH: OKAY,
11	INTERVIEW THAT WE JUST HEARD AND IN THE FUSE T.V.	11	THE VIDEOGRAPHER: THANK YOU.
12	VIDEO THAT WE HEARD A MOMENT AGO, WHAT YOU SAID	12	BY MR. BUSCH:
13	ABOUT THE CREATION OF THE SONG AND THE SPEAKING OF	13	Q. OKAY. AND APOLOGIZE FOR HAVING TO
14	PHARRELL ABOUT "GOT TO GIVE IT UP" AND TRYING TO	14	ASK THIS AGAIN, BUT
15	GET A LITTLE GROOVE LIKE "GOT TO GIVE IT UP"	1.5	A. NO, OF COURSE.
16	GOING, NONE OF THAT IS TRUE?	16	Q WERE YOU DRUNK AND ON VICODIN AT
17	A. NONE OF THAT'S TRUE.	17	THE TIME?
18	Q. OKAY.	18	A. YES, SIR.
19	OKAY. LET'S MARK AS EXHIBIT THE	19	Q OKAY.
20	NEXT EXHIBIT AN INTERVIEW THAT YOU DID WITH "VEVO"	20	A. SORRY. THAT'S WHY I'M STARTING TO
21	IN 2013.	21	FEEL A LITLE SAD, 'CUZ
22	A. OKAY,	22	Q OKAY.
23	MR. BUSCH: EXHIBIT 38?	23	A I'M I HAD A TOUGH YEAR.
24	DEPOSITION OFFICER: CORRECT.	24	Q. ALL RIGHT. LET'S GO -
25	///	25	MR. KING: IF YOU NEED A BREAK.
~~	.,,	23	MIC. MING. IF TOO NEED ABREAN,
	114		116
	The state of the s	***************************************	
1	BY MR. BUSCH;	1	JUST LET HIM KNOW,
2	Q. AND, MR. THICKE, I DO HAVE TO ASK	2	THE DEPONENT: NO.
3	YOU: WHEN YOU WHEN YOU DID THE INTERVIEW THAT	3	BY MR. BUSCH:
4	WE JUST PLAYED FROM V.H1, WERE YOU DRUNK AND ON	4	Q. SO
5	VICODIN?	5	A. YEAH, I NEED A BREAK.
6	A. I WAS I DIDN'T DO A SINGLE	6	THE VIDEOGRAPHER: DON'T FORGET
7	INTERVIEW LAST YEAR WITHOUT BEING HIGH ON BOTH.	7	YOUR MICROPHONES. AND WE'LL GO OFF THE VIDEOTAPE
8	Q. OKAY. SO THE ANSWER TO MY QUESTION	8	RECORD AT 2:23 P.M. THAT'S 2:23,
9	IS "YES"?	9	AND THAT IS OFF.
10	A, YES.	10	(WHEREUPON, A RECESS WAS HELD
11	Q. OKAY.	11	FROM 2:23 P.M. TO 2:31 P.M.)
12	(WHEREUPON, DEFENDANTS' EXHIBIT NUMBER	12	THE VIDEOGRAPHER: WE'RE BACK ON
13	38 WAS MARKED FOR IDENTIFICATION BY	13	THE VIDEOTAPE RECORD, BEGINNING DISK NUMBER THREE
14	THE DEPOSITION OFFICER AND IS ATTACHED	1.4	OF VOLUME NUMBER I AT 2:31 P.M.
15	HERETO.)	15	BY MR. BUSCH:
16	DEPOSITION OFFICER: HERE YOU GO.	16	Q. HAD I STARTED THIS LAST ONE? I
17	THE DEPONENT: THANK YOU.	17	DON'T THINK I DID.
18	MR. BUSCH: LET'S JUST PLAY THE	18	I DO HAVE TO ASK YOU A FEW
19	CLIP, THE VIDEO FROM THE CLIP ON THIS IS	1.9	QUESTIONS,
20	"VEVO," TRACK NINE.	20	A. YES.
21	(WHEREUPON, VIDEO CLIP WAS PLAYED.)	21	MR. KING: YOU DID "VEVO"
22	BY MR. BUSCH;	22	MR. BUSCH: WE DID THE "VEVO."
23	Q. ALL RIGHT. SO, MR. THICKE, THAT	23	MR. KING: YOU DID THE "VEVO." ONE.
24	WAS YOU AND YOU DID THAT INTERVIEW?	24	· · · · · · · · · · · · · · · · · · ·
	The state of the s	24	MR. BUSCH: IT'S DONE. WE DID
25	A. YEAH.	2 =	"\/=\/O." OKAY
25	A. YEAH.	25	"VEVO." OKAY.



Kelli Norden and Associates Court Reporters 310.820.7733 phone 310.820.7933 fax 11833 W. Olympic Boulevard Suite 680E Los Angeles, California 9006+ kna&kellinorden.com

		1	
1.	MR. KING: YES.	1	A. YEAH, JUST ABOUT THAT SAME SIZE,
2	BY MR. BUSCH;	2	AND I WOULD HAVE THE WATER BOTTLE AND SIP IT.
3	Q. ALL RIGHT. MR. THICKE, I DO NEED	3	Q. AN EIGHT-OUNCE, 12-OUNCE WATER
4	TO ASK YOU A FEW QUESTIONS	4	BOTTLE?
5	A. OKAY.	5	A. ABOUT THAT.
6	Q BECAUSE TO ME, IN THESE VIDEOS	6	Q. OKAY. HAVE YOU EVER BEEN DURING
7	THAT I'M WATCHING	7	THIS TIME PERIOD, WERE YOU EVER PULLED OVER.
8	A. RIGHT.	8	ARRESTED FOR D.U.I. OR ANYTHING LIKE THAT?
9	Q YOU DON'T APPEAR EITHER DRUNK OR	9	
10	ON VICODIN.	10	A. NO, SIR.
11	A. YES.	1	Q. ALL RIGHT.
12	Q. SO I DO HAVE TO ASK YOU SOME	11	A. YEAH, I WAS PULLED OVER FOR SMOKING
13	FOLLOW-UP QUESTIONS	12	A JOINT IN THE BACK SEAT OF AN S.U.V. ON THE WAY
14	A. THAT'S FINE,	13	TO THE AIRPORT IN NEW YORK CITY.
		1.4	Q. OKAY. BUT THAT'S THAT'S
15	Q ON THAT.	15	A. BUT IT WASN'T MY D.U.I., SO NO.
16	DO YOU REMEMBER THE TIME OF DAY	16	Q. OKAY.
17	THAT YOU DID THE VIDEOS THAT WE'VE BEEN WATCHING?	17	A. THE ANSWER WOULD BE NO.
18	A. EVERY DAY I WOKE UP, I WOULD TAKE A	1.8	Q. OKAY.
19	VICODIN TO START THE DAY AND THEN I WOULD FILL UP	19	A. SORRY.
20	A WATER BOTTLE WITH VODKA AND DRINK IT BEFORE AND	20	Q. ALL RIGHT. GO TO
21,	DURING MY INTERVIEWS.	21	A. THIS IS WATER, BY THE WAY.
22	Q. ALL RIGHT. SO HOW MANY VICODIN DO	22	Q. OKAY, THE NEXT INTERVIEW I HAVE
23	YOU BELIEVE YOU HAD TAKEN ON THE DAY OF THE	23	A TRANSCRIPTION OH, THAT'S RIGHT.
24	INTERVIEWS PRIOR TO THE INTERVIEW?	24	YOU HAVE DO YOU HAVE A
25	A. I WOULD SAY NORMALLY ONE OR TWO.	25	PUBLICIST?
	440		
* Sec. Sec. Sec. (1) 10 10 10 10 10 10 10 10 10 10 10 10 10	118		120
1	Q. OKAY.	1.	A. I DO. I HAVE A NEW PUBLICIST. I
2	A. BUT ONE OR TWO DURING DURING THE	2	HAD A DIFFERENT PUBLICIST FOR FOR LAST YEAR.
3	DURING THE MORNING AND AFTERNOON AND THEN A COUPLE	3	Q. WHO?
4	MORE AT NIGHT.	4	A. BY THE NAME OF CARLEEN DONOVAN.
5	Q. OKAY. SO DO YOU KNOW THE TIME OF	5	Q. IS SHE WITH A FIRM?
6	DAY THAT YOU DID THESE INTERVIEWS?	6	A. WHAT WHAT'S THE NAME OF
7	A. IDON'T. THEY NORMALLY RAN TEN, 12	7	CARLEEN'S FIRM?
8	HOURS A DAY, THAT WE'D START AT 8:00 IN THE	8	MR. KING: YOU CAN'T ASK HIM. SO
9	MORNING AND FINISH AT 8:00 AT NIGHT, SO I DON'T	9	IF YOU KNOW, YOU KNOW. IF YOU DON'T KNOW.
10	KNOW. AT ANY TIME OF DAY, THOSE WERE TAKING	10	
11	PLACE.	11	THE DEPONENT: OH, I APOLOGIZE. EXCUSE ME. I DO NOT KNOW THE NAME OF THE
12	Q. OKAY.	12	
13	A. THE "OPRAH" ONE I REMEMBER BECAUSE	ţ	PUBLICITY FIRM.
14	IT STANDS OUT. IT WAS IN THE AFTERNOON.	13	BY MR. BUSCH:
		14	Q. CARLEEN DONO VAN IS HER NAME?
15	Q. OKAY. AND DO YOU REMEMBER HOW MANY	15	A. CARLEEN DONOVAN.
16	VICODIN YOU WERE ON FOR THE "OPRAH" INTERVIEW, FOR	16	Q. C-A-R-L-E-E-N?
17	EXAMPLE?	17	A. YES.
. 18	A. DEFINITELY. IT WAS ACTUALLY A	18	Q. D-O-N-O-V-A-N?
19	NORCO, WHICH IS LIKE TWO VICODIN IN ONE PILL.	19	A. YES, SIR.
20	Q. OKAY.	20	Q. OKAY, AND WHY IS SHE NO LONGER
21	A. SO TWICE TWICE THE TWO TIMES	21	YOUR PUBLICIST?
22	THE POWER.	22	A. THERE'S A FRIEND OF MINE IN THE
23	Q. AND YOU SAID YOU ALSO FILLED UP A	23	BUSINESS WHO USES SOMEBODY ELSE THAT I HAD WANTED
24	WATER BOTTLE WATER BOTTLE LIKE THE ONE IN FRONT	24	TO WORK WITH FOR AWHILE.
24.72			
25	OF YOU RIGHT NOW?	25	MY MANAGEMENT WHEN I WHEN
	OF YOU RIGHT NOW?	25	MY MANAGEMENT WHEN I WHEN 121



Kelli Norden and Associates Court Reporters 510.820.7753 phone 510.820.7933 fax 11833 W. Olympic Boulevard Suite 680E Los Angeles, California 90064 kna@kellinorden.com

		, 	
1	I I HAD NEW MANAGEMENT ABOUT I'M SORRY.		A NO OF COURSE NOT TITED TO SELECT
2	I GOT NEW MANAGEMENT ABOUT A YEAR	1	A. NO, OF COURSE NOT. EVERYBODY JUST
3		2	THOUGHT I WAS ENTERTAINING.
II	AND A HALF AGO, RIGHT BEFORE THIS HAPPENED, AND	3	MR. BUSCH: OKAY. LET'S MARK AS
4 5	THIS WAS SOMEBODY THAT HE WORKED WITH, MY NEW	4	THE NEXT EXHIBIT A TRANSCRIPTION OF AN INTERVIEW
II.	MANAGER, AND HE THOUGHT SHE WOULD BE A GOOD FIT	5	THAT WE ARE GOING TO PLAY THE VIDEO FOR THAT HE
6	FOR ME.	6	THAT MR. THICKE DID WITH "HOT 9-" HOLD ON ONE
7	SHE DID A NICE JOB, BUT I THOUGHT	7	SECOND.
8	THAT THIS NEW PERSON, SHAWN SACHS, WOULD BE A	8	MR. KING: -7.
9	BETTER FIT FOR ME,	9	MR. BUSCH: YEAH, BUT IT'S NOT THE
10	Q. SO CARLEEN DID NOT DO ANYTHING	10	RIGHT
11	WRONG?	11	THE DEPONENT: EXCUSE ME,
12	A. NO, NOT AT ALL.	12	MR. BUSCH: OH, YES, IT IS. YEAH,
13	Q. OKAY, WAS CARLEEN AWARE THAT WHEN	13	"HOT 97."
14	YOU WERE DOING INTERVIEWS, YOU WERE	14	DEPOSITION OFFICER: THIS IS
15	A. NO.	15	EXHIBIT 39.
16	Q TAKING VICODIN?	16	(WHEREUPON, DEFENDANTS' EXHIBIT NUMBER
17	A. NO, I	17	39 WAS MARKED FOR IDENTIFICATION BY
18	MR. KING: OBJECTION. OBJECT TO	18	THE DEPOSITION OFFICER AND IS ATTACHED
19	THE	19	HERETO.)
20	THE DEPONENT: I WASN'T	20	DEPOSITION OFFICER: HERE YOU GO.
21	MR. KING: FORM.	21	THE DEPONENT: THANK YOU,
22	THE DEPONENT: SHARING THAT	22	BY MR. BUSCH:
23	INFORMATION WITH ANYBODY.	23	Q. SO
24	BY MR. BUSCH:	24	A. SINCE I AM UNDER OATH, I WOULD LIKE
25	Q. SO SO IF I WERE TO ASK HER	25	TO CLARIFY ONE STATEMENT THAT I MADE EARLIER WHEN
	a. oo oo ii taalka to noktiek	25	TO CLARIFT ONE STATEMENT THAT I WADE EARLIER WHEN
	122		124
	MATERIA VOLIMENT AND DID INTERMEDIO CANADONIA		
1	WHETHER YOU WENT AND DID INTERVIEWS ON VICODIN OR	1	YOU ASKED ME ABOUT IF I WAS HIGH RIGHT NOW,
2	ON ALCOHOL	2	WHICH I AM NOT, AND I SAID I'VE BEEN SOBER FOR TWO
3	A. YEAH.	3	MONTHS.
4	Q TO THE BEST OF YOUR KNOWLEDGE	4	I'VE ACTUALLY ONLY BEEN SOBER OFF
5	A. I CAN'T SPEAK FOR HER, BUT I NOT	5	THE PILLS, OFF OF VICODIN. I STILL DRINK. BUT I
6	UNLESS SHE KNEW AND DIDN'T MENTION IT TO ME. IF	6	WANTED TO MAKE SURE THAT, SINCE I'M UNDER OATH, I
7	SHE NOTICED IT BUT DIDN'T SAY ANYTHING TO ME,	7	DON'T WANT IT TO COME BACK AND SAY, "YOU WE
8	MAYBE. BUT NO, NOT TO MY KNOWLEDGE.	8	HEARD SOMEBODY SAW YOU DRINKING AND YOU SAID
9	AND SHE I MEAN, SHE MIGHT HAVE	9	YOU WERE SOBER FOR TWO MONTHS."
10	KNOWN I WAS DRINKING, YES, BECAUSE I NORMALLY	10	SO MY SOBRIETY HAS ONLY BEEN OFF OF
11	WOULD BE SAYING, "HEY, GRAB ME A VODKA" OR "GET	11	VICODIN,
12	ME" I WAS DRINKING OPENLY IN FRONT OF EVERYONE,	12	Q. OKAY,
13	BUT NO, NOBODY ELSE BESIDES MY	13	A. JUST TO MAKE THAT CLEAR ON THE
14	PERSONAL ASSISTANT WOULD HAVE KNOWN I WAS TAKING	14	RECORD.
15	VICODIN.	15	MR. BUSCH: OKAY, LET'S PLAY IF
16	Q. AND SO IF I WERE TO CALL HER IN AND	16	YOU COULD PLEASE PLAY TRACK 11. CLIP 11. THANK
17	ASK HER WHETHER SHE ALLOWED YOU TO GO ON, DO	17	YOU.
18	INTERVIEWS, AWARE THAT YOU WERE ON DRUGS OR DRUNK	18	(WHEREUPON, VIDEO CLIP WAS PLAYED.)
19	AT THE TIME, BECAUSE THERE'S A DIFFERENCE IN	19	BY MR. BUSCH:
20	HAVING A DRINK AND	20	Q. OKAY. SO, MR. THICKE, THAT IS YOUR
21	A. RIGHT.	21	VOICE IN THAT INTERVIEW?
22	Q BEING DRUNK	22	A. YES.
23	A. RIGHT.	23	Q. YOU DID GIVE THAT INTERVIEW? YOU
24	Q YOU WOULD HAVE NO YOU DID NOT	24	DID SAY THOSE WORDS?
25	SHARE THAT INFORMATION WITH HER?	25	A. YES, SIR.
{		رم	ru 140, OIA.
[]	123		125



Kelli Norden and Associates Court Reporters 310.820.7733 phone 310.820.7933 fax 1835 W. Olympic Boulevard Suite 680t Los Angeles, California 90064 kna@kellinorden.com

i 			
	O SOLUMNIT TO DIDECT VOLID ATTENTION		
1 2	Q. SO I WANT TO DIRECT YOUR ATTENTION	1.	A. SORRY.
3	TO THE INITIAL QUESTION.	2	Q. THIS IS ACTUALLY SOMEONE
H	A. OKAY.	3	A. SPECIFICALLY
4	Q. THE QUESTION WAS ASKED OF YOU:	4	Q SPECIFICALLY
5	"IS THE SONG IT	5	A A RECORD
6	FEELS BECAUSE SPEAKING OF OLD	6	Q "GOT TO GIVE IT UP"
7	MAN DANCES AND BARBEQ UE DANCES,	7	A. YES,
8	IT FEELS SORT OF LIKE GOT TO	8	Q PART TWO. AND YOU SAID,
9	GIVE IT UP,' PART TWO, AND YOU	9	"DEFINITELY, YEAH," AND YOU DIDN'T MEAN IT WHEN
10	SAID, 'DEFINITELY, YEAH.'"	10	YOU SAID THAT,
11	DO YOU AGREE THAT "BLURRED LINES"	11	A. I DIDN'T I DID NOT MEAN THAT,
12	CAN BE ACCURATELY CLASSIFIED AS "GOT TO GIVE IT	12	NO,
13	UP," PART TWO?	13	Q. OKAY. AND WHEN YOU WENT ON TO SAY
14	A. NO.	14	IN THE INTERVIEW THAT YOU TOLD PHARRELL THAT YOU'D
15	Q. THEN WHY DID YOU SAY "DEFINITELY,	15	LIKE TO:
16	YEAH"?	16	"DO SOMETHING LIKE 'GOT TO
17	A. WELL, THEY TEACH YOU IN THE	17	GIVE IT UP' AND HE STARTED WITH
18	ENTERTAINMENT AND IN AND TO IN IMPROV TO	18	THE PERCUSSION, YOU KNOW, TRYING
19	ALWAYS SAY "YES" AND AND MOVE FORWARD AND	19	TO GET THAT RYTHYM."
20	INSTEAD OF SAYING "NO" TO THINGS.	20	A. RIGHT.
21	SO IF THEY SAY, "HEY, IT'S	21	Q. THERE WAS NO INSTANCE WHERE THAT
22	EXCITING," IF THEY'RE IF THEY'RE GIVING YOU	22	WAS TRUE? THAT WAS NOT TRUE?
23	POSITIVITY, YOU ALWAYS GO, "YEAH, OF COURSE, MAN.	23	A. I WASN'T EVEN THERE WHEN HE STARTED
24	THAT'S WHAT WE WERE GOING FOR."	24	IT.
25	YOU DON'T STOP IT'S THAT	25	Q. OKAY.
	110000000000000000000000000000000000000	23	Q. OIVII.
200000000000000000000000000000000000000	126		128
1	ENTERTAINMENT. IT'S BAD INTERVIEW TO FIGHT AND	1 1	A. SO THAT WAS JUST ME TRYING TO
2	ARGUE AND DISAGREE.	2	CONTINUE TO TAKE CREDIT LIKE IT WAS ME AND HIM WHO
3	SO IF SOMEBODY LENDS ME A POSITIVE	3	MADE IT TOGETHER.
4	OPENING, I FOLLOW THE POSITIVITY WITH, "YEAH, MAN.	4	MR. BUSCH: OKAY, GOING TO MOVE TO
5	THAT'S EXACTLY WHAT WE WERE GOING FOR. ALL THE	5	STRIKE AS NONRESPONSIVE
6	WAY."	6	THE DEPONENT: OKAY.
7	Q. ALL RIGHT. SO WHEN WHEN YOU	7	MR. BUSCH: AND ASK THE QUESTION
8	AGREED AND SAID "DEFINITELY, YEAH," THAT "BLURRED	8	AGAIN.
9	LINES" WAS	9	THE DEPONENT: I'M SORRY,
10	А. ҮЕАН.	10	BY MR. BUSCH:
11	A		
li	Q. ~ LIKE "GOT TO GIVE IT UP," PART	11	Q. AND MY QUESTION IS: WHEN YOU SAID
12	TWO, THAT WAS NOT THAT WAS NOT HOW YOU FELT?	11 12	Q. AND MY QUESTION IS: WHEN YOU SAID THAT AFTER REFERENCING "GOT TO GIVE IT UP," THAT
12 13	TWO, THAT WAS NOT THAT WAS NOT HOW YOU FELT? A. YES. AND I WAS AND I WASN'T		
12	TWO, THAT WAS NOT THAT WAS NOT HOW YOU FELT? A. YES. AND I WAS AND I WASN'T AND I WASN'T BEING LITERAL. I WAS AFTER SO	12	THAT AFTER REFERENCING "GOT TO GIVE IT UP," THAT
12 13	TWO, THAT WAS NOT THAT WAS NOT HOW YOU FELT? A. YES. AND I WAS AND I WASN'T AND I WASN'T BEING LITERAL. I WAS AFTER SO MANY PEOPLE, AND LIKE THE INTERVIEWERS WERE	12 13	THAT AFTER REFERENCING "GOT TO GIVE IT UP," THAT PHARRELL:
12 13 14	TWO, THAT WAS NOT THAT WAS NOT HOW YOU FELT? A. YES. AND I WAS AND I WASN'T AND I WASN'T BEING LITERAL. I WAS AFTER SO MANY PEOPLE, AND LIKE THE INTERVIEWERS WERE SAYING, "HEY, MAN, IT REMINDS ME OF THAT SONG. IT	12 13 14	THAT AFTER REFERENCING "GOT TO GIVE IT UP," THAT PHARRELL: "STARTED TRYING TO GET
12 13 14 15	TWO, THAT WAS NOT THAT WAS NOT HOW YOU FELT? A. YES. AND I WAS AND I WASN'T AND I WASN'T BEING LITERAL. I WAS AFTER SO MANY PEOPLE, AND LIKE THE INTERVIEWERS WERE	12 13 14 15	THAT AFTER REFERENCING "GOT TO GIVE IT UP," THAT PHARRELL: "STARTED TRYING TO GET THAT RYTHYM" A. YEAH.
12 13 14 15 16	TWO, THAT WAS NOT THAT WAS NOT HOW YOU FELT? A. YES. AND I WAS AND I WASN'T AND I WASN'T BEING LITERAL. I WAS AFTER SO MANY PEOPLE, AND LIKE THE INTERVIEWERS WERE SAYING, "HEY, MAN, IT REMINDS ME OF THAT SONG. IT	12 13 14 15 16	THAT AFTER REFERENCING "GOT TO GIVE IT UP," THAT PHARRELL: "STARTED TRYING TO GET THAT RYTHYM"
12 13 14 15 16 17	TWO, THAT WAS NOT THAT WAS NOT HOW YOU FELT? A. YES. AND I WAS AND I WASN'T AND I WASN'T BEING LITERAL. I WAS AFTER SO MANY PEOPLE, AND LIKE THE INTERVIEWERS WERE SAYING, "HEY, MAN, IT REMINDS ME OF THAT SONG. IT REMINDS ME OF THAT ERA," I WAS GOING, "YEAH, MAN.	12 13 14 15 16 17	THAT AFTER REFERENCING "GOT TO GIVE IT UP," THAT PHARRELL: "STARTED TRYING TO GET THAT RYTHYM" A. YEAH. Q THAT QUOTE, THAT A. UNTRUE. THAT IS COMPLETELY UNTRUE.
12 13 14 15 16 17 18	TWO, THAT WAS NOT THAT WAS NOT HOW YOU FELT? A. YES. AND I WAS AND I WASN'T AND I WASN'T BEING LITERAL. I WAS AFTER SO MANY PEOPLE, AND LIKE THE INTERVIEWERS WERE SAYING, "HEY, MAN, IT REMINDS ME OF THAT SONG. IT REMINDS ME OF THAT ERA," I WAS GOING, "YEAH, MAN. THAT'S WHAT IT IS. IT'S THAT ERA." IT'S AND MARVIN GAYE, BEING ONE	12 13 14 15 16 17 18	THAT AFTER REFERENCING "GOT TO GIVE IT UP," THAT PHARRELL: "STARTED TRYING TO GET THAT RYTHYM" A. YEAH. Q THAT QUOTE, THAT A. UNTRUE. THAT IS COMPLETELY UNTRUE. Q. OKAY. WAS IT YOUR IDEA TO DECIDE
12 13 14 15 16 17 18 19	TWO, THAT WAS NOT THAT WAS NOT HOW YOU FELT? A. YES. AND I WAS AND I WASN'T AND I WASN'T BEING LITERAL. I WAS AFTER SO MANY PEOPLE, AND LIKE THE INTERVIEWERS WERE SAYING, "HEY, MAN, IT REMINDS ME OF THAT SONG. IT REMINDS ME OF THAT ERA," I WAS GOING, "YEAH, MAN. THAT'S WHAT IT IS. IT'S THAT ERA." IT'S AND MARVIN GAYE, BEING ONE OF THE GREATEST TO EVER LIVE, SURE, I WANT MY NEW	12 13 14 15 16 17 18 19	THAT AFTER REFERENCING "GOT TO GIVE IT UP," THAT PHARRELL: "STARTED TRYING TO GET THAT RYTHYM" A. YEAH. Q THAT QUOTE, THAT A. UNTRUE. THAT IS COMPLETELY UNTRUE.
12 13 14 15 16 17 18 19 20	TWO, THAT WAS NOT THAT WAS NOT HOW YOU FELT? A. YES. AND I WAS AND I WASN'T AND I WASN'T BEING LITERAL. I WAS AFTER SO MANY PEOPLE, AND LIKE THE INTERVIEWERS WERE SAYING, "HEY, MAN, IT REMINDS ME OF THAT SONG. IT REMINDS ME OF THAT ERA," I WAS GOING, "YEAH, MAN. THAT'S WHAT IT IS. IT'S THAT ERA." IT'S AND MARVIN GAYE, BEING ONE OF THE GREATEST TO EVER LIVE, SURE, I WANT MY NEW SONG TO BE COMPARED TO MARVIN GAYE. SURE.	12 13 14 15 16 17 18 19 20 21	THAT AFTER REFERENCING "GOT TO GIVE IT UP," THAT PHARRELL: "STARTED TRYING TO GET THAT RYTHYM" A. YEAH. Q THAT QUOTE, THAT A. UNTRUE. THAT IS COMPLETELY UNTRUE. Q. OKAY. WAS IT YOUR IDEA TO DECIDE TO ADD A COWBELL TO A. NO.
12 13 14 15 16 17 18 19 20 21	TWO, THAT WAS NOT THAT WAS NOT HOW YOU FELT? A. YES. AND I WAS AND I WASN'T AND I WASN'T BEING LITERAL. I WAS AFTER SO MANY PEOPLE, AND LIKE THE INTERVIEWERS WERE SAYING, "HEY, MAN, IT REMINDS ME OF THAT SONG. IT REMINDS ME OF THAT ERA," I WAS GOING, "YEAH, MAN. THAT'S WHAT IT IS. IT'S THAT ERA." IT'S AND MARVIN GAYE, BEING ONE OF THE GREATEST TO EVER LIVE, SURE, I WANT MY NEW	12 13 14 15 16 17 18 19 20 21 22	THAT AFTER REFERENCING "GOT TO GIVE IT UP," THAT PHARRELL: "STARTED TRYING TO GET THAT RYTHYM" A. YEAH. Q THAT QUOTE, THAT A. UNTRUE. THAT IS COMPLETELY UNTRUE. Q. OKAY. WAS IT YOUR IDEA TO DECIDE TO ADD A COWBELL TO A. NO. Q "BLURRED LINES"?
12 13 14 15 16 17 18 19 20 21 22	TWO, THAT WAS NOT THAT WAS NOT HOW YOU FELT? A. YES. AND I WAS AND I WASN'T AND I WASN'T BEING LITERAL. I WAS AFTER SO MANY PEOPLE, AND LIKE THE INTERVIEWERS WERE SAYING, "HEY, MAN, IT REMINDS ME OF THAT SONG. IT REMINDS ME OF THAT ERA," I WAS GOING, "YEAH, MAN. THAT'S WHAT IT IS. IT'S THAT ERA." IT'S AND MARVIN GAYE, BEING ONE OF THE GREATEST TO EVER LIVE, SURE, I WANT MY NEW SONG TO BE COMPARED TO MARVIN GAYE. SURE. Q. OKAY. SO THIS WASN'T A REFERENCE	12 13 14 15 16 17 18 19 20 21 22 23	THAT AFTER REFERENCING "GOT TO GIVE IT UP," THAT PHARRELL: "STARTED TRYING TO GET THAT RYTHYM" A. YEAH. Q THAT QUOTE, THAT A. UNTRUE. THAT IS COMPLETELY UNTRUE. Q. OKAY. WAS IT YOUR IDEA TO DECIDE TO ADD A COWBELL TO A. NO. Q "BLURRED LINES"? OKAY. WAS IT YOUR IDEA TO OMIT THE
12 13 14 15 16 17 18 19 20 21 22 23	TWO, THAT WAS NOT THAT WAS NOT HOW YOU FELT? A. YES. AND I WAS AND I WASN'T AND I WASN'T BEING LITERAL. I WAS AFTER SO MANY PEOPLE, AND LIKE THE INTERVIEWERS WERE SAYING, "HEY, MAN, IT REMINDS ME OF THAT SONG. IT REMINDS ME OF THAT ERA," I WAS GOING, "YEAH, MAN. THAT'S WHAT IT IS. IT'S THAT ERA." IT'S AND MARVIN GAYE, BEING ONE OF THE GREATEST TO EVER LIVE, SURE, I WANT MY NEW SONG TO BE COMPARED TO MARVIN GAYE. SURE. Q. OKAY. SO THIS WASN'T A REFERENCE TO THE ERA, NOT TO ARGUE WITH YOU.	12 13 14 15 16 17 18 19 20 21 22 23 24	THAT AFTER REFERENCING "GOT TO GIVE IT UP," THAT PHARRELL: "STARTED TRYING TO GET THAT RYTHYM" A. YEAH. Q THAT QUOTE, THAT A. UNTRUE. THAT IS COMPLETELY UNTRUE. Q. OKAY. WAS IT YOUR IDEA TO DECIDE TO ADD A COWBELL TO A. NO. Q "BLURRED LINES"? OKAY. WAS IT YOUR IDEA TO OMIT THE GUITAR FROM "BLURRED LINES," OR NOT TO HAVE A
12 13 14 15 16 17 18 19 20 21 22 23 24	TWO, THAT WAS NOT THAT WAS NOT HOW YOU FELT? A. YES. AND I WAS AND I WASN'T AND I WASN'T BEING LITERAL. I WAS AFTER SO MANY PEOPLE, AND LIKE THE INTERVIEWERS WERE SAYING, "HEY, MAN, IT REMINDS ME OF THAT SONG. IT REMINDS ME OF THAT ERA," I WAS GOING, "YEAH, MAN. THAT'S WHAT IT IS. IT'S THAT ERA." IT'S AND MARVIN GAYE, BEING ONE OF THE GREATEST TO EVER LIVE, SURE, I WANT MY NEW SONG TO BE COMPARED TO MARVIN GAYE. SURE. Q. OKAY. SO THIS WASN'T A REFERENCE TO THE ERA, NOT TO ARGUE WITH YOU. A. NO.	12 13 14 15 16 17 18 19 20 21 22 23	THAT AFTER REFERENCING "GOT TO GIVE IT UP," THAT PHARRELL: "STARTED TRYING TO GET THAT RYTHYM" A. YEAH. Q THAT QUOTE, THAT A. UNTRUE. THAT IS COMPLETELY UNTRUE. Q. OKAY. WAS IT YOUR IDEA TO DECIDE TO ADD A COWBELL TO A. NO. Q "BLURRED LINES"? OKAY. WAS IT YOUR IDEA TO OMIT THE
12 13 14 15 16 17 18 19 20 21 22 23 24	TWO, THAT WAS NOT THAT WAS NOT HOW YOU FELT? A. YES. AND I WAS AND I WASN'T AND I WASN'T BEING LITERAL. I WAS AFTER SO MANY PEOPLE, AND LIKE THE INTERVIEWERS WERE SAYING, "HEY, MAN, IT REMINDS ME OF THAT SONG. IT REMINDS ME OF THAT ERA," I WAS GOING, "YEAH, MAN. THAT'S WHAT IT IS. IT'S THAT ERA." IT'S AND MARVIN GAYE, BEING ONE OF THE GREATEST TO EVER LIVE, SURE, I WANT MY NEW SONG TO BE COMPARED TO MARVIN GAYE. SURE. Q. OKAY. SO THIS WASN'T A REFERENCE TO THE ERA, NOT TO ARGUE WITH YOU. A. NO.	12 13 14 15 16 17 18 19 20 21 22 23 24	THAT AFTER REFERENCING "GOT TO GIVE IT UP," THAT PHARRELL: "STARTED TRYING TO GET THAT RYTHYM" A. YEAH. Q THAT QUOTE, THAT A. UNTRUE. THAT IS COMPLETELY UNTRUE. Q. OKAY. WAS IT YOUR IDEA TO DECIDE TO ADD A COWBELL TO A. NO. Q "BLURRED LINES"? OKAY. WAS IT YOUR IDEA TO OMIT THE GUITAR FROM "BLURRED LINES," OR NOT TO HAVE A



Kelli Norden and Associates Court Reporters 510.820.7753 phone 310.820.7933 fax 1835 W. Olympic Boulevard Suite 680E Los Angeles, California 3006+ kna@kellinorden.com

		7,44	
1	A. NO.	١.	. avvv
2	Q. DID YOU DISCUSS WITH PHARRELL	1	A. OKAY.
3	EITHER OF THOSE TWO THINGS, HAVING A COWBELL, NOT	2	Q. AND AFTER THE LAWSUIT WAS FILED,
4	HAVING A GUITAR?	3	THE QUESTION WAS ASKED OF YOU:
5	A. NO.	4	"SO WHEN YOU WHEN YOU
6		5	WROTE IT," REFERENCING "BLURRED
7	Q. OKAY. DO YOU EVER INTERNALLY	6	LINES," DO YOU THINK OF MARVIN
8	HAVE YOU EVER INTERNALLY, WHEN CREATING MUSIC,	7	GAYE, LIKE WHEN YOU WRITE YOUR
II -	EVER THOUGHT OF MARVIN GAYE?	8	MUSIC?"
9	A. NOT WHILE I'M CREATING, NO.	9	THE ANSWER WAS "NO,"
10	Q. OKAY.	10	"QUESTION: ARE YOU A FAN
11	A. WHEN I LISTEN TO HIS MUSIC, I AM	11	OF MARVIN GAYE?
12	INSPIRED BY HIS GREATNESS.	12	"ANSWER: THE BIGGEST."
13	Q. OKAY,	13	A. OKAY,
14	A. BUT NOBODY ENTERS NO OTHER	14	Q. OKAY? LET'S PLAY THAT. THAT IS
15	MUSICIANS OR MUSICALITY ENTERS MY MIND. I HAVE	15	CLIP NUMBER 13.
16	TOO MUCH OF MY OWN MUSIC IN MY HEAD.	16	(WHEREUPON, AUDIO CLIP PLAYED.)
17	Q. NOW, AFTER THIS LAWSUIT WAS	17	BY MR. BUSCH:
18	FILED BY YOU, ACTUALLY.	18	Q. OKAY. ALL RIGHT. SO WHEN YOU
19	A. UH-HUH,	19	ANSWERED THAT QUESTION AFTER THE LAWSUIT WAS FILED
20	Q. AFTER YOU FILED THIS LAWSUIT	20	AND YOU WERE ASKED WHETHER YOU WERE THINKING OF
21	AGAINST MARVIN GAYE'S CHILDREN	21	MARVIN GAYE, YOU ANSWERED "NO."
22	A OKAY.	22	A. RIGHT.
23	Q YOU GAVE AN INTERVIEW, ALSO	23	Q. SO I GUESS MY QUESTION IS: DID YOU
24	ABOUT "BLURRED LINES" AND MARVIN GAYE.	24	CHANGE YOUR TUNE AT THAT POINT BECAUSE OF THIS
25	AND CAN YOU PLEASE PLAY THE CLIP.	25	LAWSUIT?
li			
	130		132
1	LET ME MARK THE TRANSCRIPTION AS	1	MR. KING: OBJECTION. OBJECT TO
2	AS A DOC AS AN EXHIBIT.	2	THE FORM OF THE QUESTION, ARGUMENTATIVE.
3	OH, BEFORE I MARK THE NEXT EXHIBIT,	3	BY MR. BUSCH:
4	WAS IT YOUR IDEA TO PUT "HEY, HEY, HEY," THAT	4	Q. GO AHEAD.
5	VOCAL LINE, "HEY, HEY," INTO GROUPS OF THREE?	5	A. NO, ACTUALLY, BECAUSE WHAT WHAT
6	A. NO, THAT WAS ALL PHARRELL.	6	SOMEBODY SOMEBODY ELSE HAD MENTIONED TO ME
7	Q. OKAY. AND HOW MANY TIMES DO YOU	7	SOMETHING ABOUT THE T.M.Z. THING AND SAID THAT I
8	SING THE GROUPS OF LYRICS "HEY, HEY, HEY" IN THE	8	SAID SOMETHING LIKE, "WAS MARVIN GAYE IN THE ROOM
9	SONG?	9	WITH YOU WHEN YOU WROTE THIS SONG?"
1.0	 A. I WOULDN'T BE I WOULDN'T KNOW. 	10	AND I SAID, "ABSOLUTELY NOT. WE
11	Q. OKAY. ALL RIGHT, SO WE'LL MARK	11	WERE WRITING ABOUT A WOMAN, HOW CAN WE BE
12	THE T.M.Z. TRANSCRIPT TRANSCRIPT FROM	12	THINKING OF MARVIN GAYE WHEN WE WERE WRITING A
13	MR. THICKE'S INTERVIEW WITH T.M.Z. AS THE NEXT	13	SONG ABOUT BEAUTIFUL WOMEN?"
14	EXHIBIT,	14	Q. THAT THAT MIGHT MAYBE THAT
15	WHAT ARE WE UP TO?	15	WAS A DIFFERENT INTERVIEW
16	DEPOSITION OFFICER: 40. EXHIBIT	16	(SPEAKING SIMULTANEOUSLY.)
17	40.	17	THE DEPONENT: OKAY
18	(WHEREUPON, DEFENDANTS' EXHIBIT NUMBER	18	BY MR. BUSCH:
1.9	40 WAS MARKED FOR IDENTIFICATION BY	19	Q BUT IN THIS ONE
20	THE DEPOSITION OFFICER AND IS ATTACHED	20	A PERTAINING TO HERE, BECAUSE I
21	HERETO.)	21	DON'T UNDERSTAND THE RELEVANCE OF THAT INTERVIEW.
22	BY MR, BUSCH:	22	OR
23	Q. 40. AND THEN IF I'LL JUST READ	23	Q. OKAY.
24	IT FOR THE RECORD. SO IN THE THIS WAS AFTER	24	A OR THAT QUOTE,
25	THE LAWSUIT WAS FILED.	25	
		45	Q. OKAY. THIS IS THE RELEVANCE
	131		177
L			133



Kelli Norden and Associates Court Reporters 310.820.7733 phone 310.820.7933 fax 11833 W. Olympic Boulevard Suite 660E Los Angeles, California 90064 kna&kellinorden.com

1 THE BEATLES, ALL AND BOB DYLAN TOO. 2 Q. OKAY. SO THE ONE QUESTION IN ALL 3 OF THE INTERVIEWS THAT WE'VE GONE THROUGH SO FAR, 4 THE ONE QUESTION THAT YOU - THAT WAS NOT A LIE 5 AND WHICH YOU DID ANSWER HONESTLY WAS THE ONE 6 QUESTION BEING: 7 "ARE YOU A FAN OF MARVIN 8 GAYE"	OU
Q. OKAY. SO THE ONE QUESTION IN ALL OF THE INTERVIEWS THAT WEVE GONE THROUGH SO FAR, THE DAKE QUESTION THAT YOU — THAT WAS NOT A LIE AND WHICH YOU DID ANSWER HONESTLY WAS THE ONE QUESTION BEING: "ARE YOU A FAN OF MARVIN GAYE?" TO WHICH YOU RESPONDED: "THE BIGGEST"? ARE NOW WHETHER THERE WAS ANY ANALYSIS OR MUSICOLOGIST BROUGHT ON BEFORE THIS LAWSUIT WAS FILED TO COMPARE "BLURRED LINES" AND LINES", THAT HE WAS TRYING TO PRETEND THAT HE WAS LINES", THAT HE WAS TRYING TO PRETEND THAT HE WAS THE DEPONENT: WEAH — MR. KING: OBJECTION, MIR. ROBERTS RE-ENTERED THE DEPOSITION PROCEEDINGS.) BY MR. BUSCH: Q. GO AHEAD. A. YEAH. AND YOU'RE SAYING "UNABLE TO PARTICIPATE." I OBVIOUSLY SANG THE WHOLE SONG. Q. MY USE— MY — WHAT — WHAT YOU SAID WASN'T — A. NO. Q. — BEFORE THE RELEASE OF "BLURRED LINES"? A. NO. Q. — BEFORE THE RELEASE OF "BLURRED LINES", THAT HE WAS TRYING TO PRETEND THAT HE WAS TELL YOU THAT WHEN HE WAS WORKING ON "BLURRED LINES," THAT HE WAS TRYING TO PRETEND THAT HE WAS THE DEPONENT: WEAH — MR. KING: OBJECTION, MIR. ROBERTS RE-ENTERED THE DEPOSITION PROCEEDINGS.) BY MR. BUSCH: Q. GO AHEAD. A. YEAH. AND YOU'RE SAYING "UNABLE TO PARTICIPATE." I OBVIOUSLY SANG THE WHOLE SONG. Q. MY USE— MY — WHAT — WHAT YOU SAID WASN'T — A. YES. A. OKAY. Q. BUT THAT — MR. KING: OBJECTION, MIR. ROBERTS RE-ENTERED THE DEPOSITION PROCEEDINGS.) BY MR. BUSCH: A. YEAH. AND YOU'RE SAYING "UNABLE TO PARTICIPATE." I OBVIOUSLY SANG THE WHOLE SONG. Q. MOIS TO THE RECORD. A. YES. A. OKAY. Q. BUT THAT — MR. KING: OBJECTION, MIR. ROBERTS RE-ENTERED THE DEPOSITION PROCEEDINGS.) SYME. BUSCH: A. YEAH. AND YOU'RE SAYING "UNABLE TO PARTICIPATE." I OBVIOUSLY SANG THE WHOLE SONG. Q. MOIS TO THE RECORD. A. YES. A. NO. Q. DOY OU KNOW WHETHER THERE WAS ANY A. NEW QUESTION. DON'T ASK HIM A NEW QUESTION. DON'T ASK HIM INCONSISTENT A SECOND AGO. A. NO. Q. WHEN THAT CORRECT! THE DEPONENT: WAS HELD THAT HE WAS THE ONE THE DEPOSITION. A. YEAL. A. NEW PA	OU
OF THE INTERVIEWS THAT WE'VE GONE THROUGH SO FAR, THE ONE QUESTION THAT YOU THAT WAS NOT A LIE AND WHICH YOU DID ANSWER HONESTLY WAS THE ONE QUESTION BEING: TO WHICH YOU RESPONDED: THE BIGGEST''? TARY WAS KING: OBJECTION; MISSTATES THAT'S (WHEREUPON, MR. ROBERTS RE-ENTERED THE DEPONENT: THAT'S (WHEREUPON, MR. ROBERTS RE-ENTERED THE DEPOSITION PROCEEDINGS.) BY MR. BUSCH: Q. GO AHEAD. A. YES. THE DEPONENT: THAT'S (WHEREUPON, MR. ROBERTS RE-ENTERED THE DEPOSITION PROCEEDINGS.) BY MR. BUSCH: Q. GO AHEAD. A. YES. THE DEPONENT: THAT'S (WHEREUPON, MR. ROBERTS RE-ENTERED THE DEPOSITION PROCEEDINGS.) BY MR. BUSCH: Q. GO AHEAD. A. YES. A. NO. C. BEFORE THE RELEASE OF "BLURRED LINES" AND LINES" A. NO. C. OKAY. DID PHARRELL WILLIAMS EVER TELL YOU THAT WHEN HE WAS WORKING ON "BLURRED LINES." THAT WAS TRYING TO PRETEND THAT HE WAS TELL YOU THAT WHEN HE WAS WORKING ON "BLURRED LINES." THAT HE WAS TRYING TO PRETEND THAT HE WAS THE DEPONENT: YEAH. MR. KING: OBJECTION; MISSTATES. THE DEPONENT: YEAH. MR. KING: HIS PRIOR TESTIMONY. THE DEPONENT: "THAT'S (WHEREUPON, MR. ROBERTS RE-ENTERED THE DEPOSITION PROCEEDINGS.) BY MR. BUSCH: A. YES. A. NO. C. AYEAH. AND YOU'RE SAYING "UNABLE TO PARTICIPATE, YEAH. DEPONENT: YEAH. MR. KING: HIS PRIOR TESTIMONY. THE DEPONENT: "THAT'S (WHEREUPON, MR. ROBERTS RE-ENTERED THE DEPONENT). BY MR. BUSCH: C. GO AHEAD. A. YEAH. AND YOU'RE SAYING "UNABLE TO PARTICIPATE, YEAH. DEPONENT: "THAT'S (WHEREUPON, MR. ROBERTS RE-ENTERED THE DEPONENT." SAYING "UNABLE TO PARTICIPATE." ID BY MR. BUSCH: C. GO AHEAD. A. YEAH. AND YOU'RE SAYING "UNABLE TO PARTICIPATE." ID BY MR. BUSCH: C. GO AHEAD. A. YES. A. NO. C. AYEAH. AND YOU'RE SAYING "UNABLE TO PARTICIPATE." ID BY MR. BUSCH: C. GO AHEAD. A. YES. A. NO. C. AYEAH. AND YOU'RE SAYING "UNABLE TO PARTICIPATE." ID BY MR. BUSCH: C. GO AHEAD. A. YES. A. NO. C. MY QUE	OU
THE ONE QUESTION THAT YOU - THAT WAS NOT A LIE AND WHICH YOU DID ANSWER HONESTLY WAS THE ONE QUESTION BEING: TARE YOU A FAN OF MARVIN GAYE?" TO WHICH YOU RESPONDED: TO WHICH YOU RESPONDED: TO WHICH YOU RESPONDED: TO WHICH YOU RESPONDED: THE BIGGEST"? A. YES. RR, KING: OBJECTION, MR. ROBERTS RE-ENTERED THE DEPOSITION PROCEEDINGS.) BY MR. BUSCH: ARGUMENTATIVE. BY MR BUSCH: ANALYSIS OR MUSICOLOGIST BROUGHT ON BEFORE THIS LAWSUIT WAS FILED TO COMPARE "BLURRED LINES" AND WIGHT TO GIVE IT UP" A. NO. Q BEFORE THE RELEASE OF "BLURRED LINES"? A. NO. Q. OKAY, DID PHARRELL WILLIAMS EVER TELL YOU THAT WHEN HE WAS WORKING ON "BLURRED LINES," THAT HE WAS TRYING TO PRETEND THAT HE WAS THE ONE QUESTION, MISSTATES THE DEPONENT: YEAH MR. KING: OBJECTION, MISSTATES THE DEPONENT: YEAH MR. KING: HIS PRIOR TESTIMONY. THE DEPONENT: YEAH MR. KING: HIS PRIOR TESTIMONY. THE DEPONENT: YEAH MR. KING: OBJECTION, MISSTATES THE DEPONENT: YEAH MR. KING: HIS PRIOR TESTIMONY. THE DEPOSITION PROCEEDINGS.) BY MR. BUSCH: A. YES. MR. KING: OBJECTION; THE DEPONENT: YEAH MR. KING: HIS PRIOR TESTIMONY. THE DEPONENT: YEAH MR. KING: DEPOSITION THE WAS HIM TO TELL YOU WHAT IS A NEW QUESTION, DON'T ASK HIM TO TELL YOU WHAT IS NO AND TESTIMONY. THE DEPONENT: YEAH MR. KING: MR. KING: WELL,	
THE DEPONENT: YEAH	
6 QUESTION BEING: 7 "ARE YOU A FAN OF MARVIN 8 GAYE?" 8 GAYE?" 9 TO WHICH YOU RESPONDED: 10 "THE BIGGEST"? 11 A. YES. 12 MR. KING: OBJECTION; 13 ARGUMENTATIVE. 14 BY MR. BUSCH: 15 Q. DO YOU KNOW WHETHER THERE WAS ANY 16 ANALYSIS OR MUSICOLOGIST BROUGHT ON BEFORE THIS 17 LAWSUIT WAS FILED TO COMPARE "BLURRED LINES" AND 18 "GOT TO GIVE IT UP" 19 A. NO. 20 Q BEFORE THE RELEASE OF "BLURRED 21 LINES"? 22 A. NO. 23 Q. OKAY. DID PHARRELL WILLIAMS EVER 24 TELL YOU THAT WHEN HE WAS WORKING ON "BLURRED 25 LINES," THAT HE WAS TRYING TO PRETEND THAT HE WAS 142 1 MARVIN GAYE? 2 A. NO. 3 Q. HAVE YOU EVER HEARD THAT BEFORE? 4 A. NEVER. 5 Q. DID THE RECORD COMPANY OR ANY 5 MR. KING: HIS PRIOR TESTIMONY. 7 THE DEPONENT: THAT'S (WHEREUPON, MR. ROBERT'S RE-ENTERED THE 2 (A. YEAL AND YOU'RE SAVING "UNABLE TO A. YEAL AND YOU'NALL THE YOU'NALL THE YOU'NALL THE YOU'NALL THE YOU'NALL THE YOU'NALL THE Y	
7 "ARE YOU A FAN OF MARVIN 6 GAYE?" 8 GAYE?" 8 (WHEREUPON, MR. ROBERTS RE-ENTERED THE DEPONITION PROCEEDINGS.) 10 "THE BIGGEST"? 10 BY MR. BUSCH: 11 A YES. 11 Q. GO AHEAD. 12 MR. KING: OBJECTION; 12 A. YEAH. AND YOU'RE SAYING "UNABLE TO A. YEAH. AND YOU'RE SAYING "UNABLE TO DEPOSITION PROCEEDINGS.) 13 ARGUMENTATIVE. 13 PARTICIPATE." I OBVIOUSLY SANG THE WHOLE SONG. 14 BY MR. BUSCH: 15 Q. DO YOU KNOW WHETHER THERE WAS ANY 16 ANALYSIS OR MUSICOLOGIST BROUGHT ON BEFORE THIS 17 LAWSUIT WAS FILED TO COMPARE "BLURRED LINES" AND 18 "GOT TO GIVE IT UP" 18 A. NO. 19 Q. BEFORE THE RELEASE OF "BLURRED LINES" AND 19 Q. BUT THAT 19 A. NO. 19 Q. BUT THAT 19 A. NEVER, 19 CLINES," THAT HE WAS TRYING TO PRETEND THAT HE WAS 18 CONDETT. OKAY. 19 Q. WHEN THE INITIAL TRACKS, THE MUSIC A. NEVER, 20 DID THE RECORD COMPANY OR ANY 5 A. YES. 10 WHEN THE INITIAL TRACKS, THE MUSIC A. NEVER, 4 FOR "BLURRED LINES," WAS BEING LAID DOWN A. YES. 10 WHEN THE INITIAL TRACKS, THE MUSIC A. YE	
8 GAYE?" 9 TO WHICH YOU RESPONDED: 10 "THE BIGGEST"? 11 A YES. 12 MR. KING: OBJECTION; 13 ARGUMENTATIVE. 14 BY MR. BUSCH: 15 Q. DO YOU KNOW WHETHER THERE WAS ANY 16 ANALYSIS OR MUSICOLOGIST BROUGHT ON BEFORE THIS 17 LAWSUIT WAS FILED TO COMPARE "BLURRED LINES" AND 18 "GOT TO GIVE IT UP" - 19 A NO. 20 Q. BEFORE THE RELEASE OF "BLURRED 21 LINES"? 22 A NO. 23 Q. OKAY. DID PHARRELL WILLIAMS EVER 24 TELL YOU THAT WHEN HE WAS WORKING ON "BLURRED 25 LINES," THAT HE WAS TRYING TO PRETEND THAT HE WAS 3 Q. HAVE YOU EVER HEARD THAT BEFORE? 4 A NO. 2 MARVIN GAYE? 4 A NEVER. 5 Q. DID THE RECORD COMPANY OR ANY 5 (WHEREUPON, MR. ROBERT'S RE-ENTERED THE DEPONSITION PROCEEDINGS.) BY MR. BUSCH: 11 Q. GO AHEAD. A YEAH. AND YOU'RE SAYING "UNABLE TO A YEAH. AND YOU'RE SAYING "	
9 TO WHICH YOU RESPONDED: 10 "THE BIGGEST"? 11 A. YES. 12 MR. KING: OBJECTION; 13 ARGUMENTATIVE. 14 BY MR. BUSCH: 15 Q. DO YOU KNOW WHETHER THERE WAS ANY 16 ANALYSIS OR MUSICOLOGIST BROUGHT ON BEFORE THIS 17 LAWSUIT WAS FILED TO COMPARE "BLURRED LINES" AND 18 "GOT TO GIVE IT UP" 19 A. NO. 20 Q BEFORE THE RELEASE OF "BLURRED 21 LINES"? 22 A. NO. 23 Q. OKAY. DID PHARRELL WILLIAMS EVER 24 TELL YOU THAT WHEN HE WAS WORKING ON "BLURRED 25 LINES," THAT HE WAS TRYING TO PRETEND THAT HE WAS 16 MARVIN GAYE? 27 A. NO. 28 MARVIN GAYE? 29 A. NO. 20 Q. HAVE YOU EVER HEARD THAT BEFORE? 20 A. NO. 21 MR. KING: WELL, I JUST HEARD 22 MARVIN GAYE? 23 MR. BUSCH: 24 THE DEPONENT: OKAY. 25 MARY WHEN THE WAS TRYING TO PRETEND THAT HE WAS 26 MARVIN GAYE? 27 A. NO. 28 MARY YOU EVER HEARD THAT BEFORE? 39 Q. HAVE YOU EVER HEARD THAT BEFORE? 4 A. NEVER. 5 Q. DID THE RECORD COMPANY OR ANY 5 A. YES. 10 BY MR. BUSCH: 11 Q. GO AHEAD. A. YEAH. AND YOU'RE SAYING "UNABLE TO A. YEAH. A. YES. 10 A. YEA. 11	
THE BIGGEST"? 10 BY MR. BUSCH: 11 A. YES. 11 Q. GO AHEAD. 12 A. YEAH. AND YOU'RE SAYING "UNABLE TO 13 ARGUMENTATIVE. 14 BY MR. BUSCH: 15 Q. DO YOU KNOW WHETHER THERE WAS ANY 16 ANALYSIS OR MUSICOLOGIST BROUGHT ON BEFORE THIS 17 LAWSUIT WAS FILED TO COMPARE "BLURRED LINES" AND 18 "GOT TO GIVE IT UP" 19 A. NO. 20 Q BEFORE THE RELEASE OF "BLURRED 21 LINES"? 22 A. NO. 23 Q. OKAY. DID PHARRELL WILLIAMS EVER 24 TELL YOU THAT WHEN HE WAS WORKING ON "BLURRED 25 LINES," THAT HE WAS TRYING TO PRETEND THAT HE WAS 26 Q. HAVE YOU EVER HEARD THAT BEFORE? 27 A. NO. 28 Q. HAVE YOU EVER HEARD THAT BEFORE? 39 Q. DID THE RECORD COMPANY OR ANY 29 DID THE RECORD COMPANY OR ANY 20 Q. WHEN THE INITIAL TRACKS, THE MUSIC 21 THE DEPONENT: OKAY. 22 BY MR. BUSCH: 23 Q. WHEN THE INITIAL TRACKS, THE MUSIC 24 FOR "BLURRED LINES," WAS BEING LAID DOWN 26 Q. DID THE RECORD COMPANY OR ANY 27 A. YES. 28 A. NO. 29 G. AND IT'S ON THE RECORD. 40 A. YES. 41 A. OKAY. 41 G. MY QUE MY WHAT WHAT YOU 41 SAID WASN'T 41 A. OKAY. 41 A. OKAY. 41 G. MY QUE MY WHAT WHAT YOU 41 SAID WASN'T 42 A. NO. 43 O. CHAY. DID PHARRELL WILLIAMS EVER 44 A. NO. 45 SAID. 46 SAID. 47 SENDING WELL, I JUST HEARD 47 SOMETHING THAT I WASN'T THAT SEEMED A BIT INCONSISTENT A SECOND AGO. 41 THE DEPONENT: OKAY. 48 SYMR. BUSCH: 49 G. MY QUE MY WHAT WHAT YOU 41 G. MY QUE MY WHAT WHAT YOU 49 G. MY QUE MY WHAT WHAT YOU 40 A. YES. 41 O. MY QUE MY WHAT YOU 41 G. MY QUE MY WHAT YOU 42 A. NO. 43 G. MY	
11 A. YES. 12 MR. KING: OBJECTION; 13 ARGUMENTATIVE. 14 BY MR. BUSCH: 15 Q. DO YOU KNOW WHETHER THERE WAS ANY 16 ANALYSIS OR MUSICOLOGIST BROUGHT ON BEFORE THIS 17 LAWSUIT WAS FILED TO COMPARE "BLURRED LINES" AND 18 "GOT TO GIVE IT UP" 19 A. NO. 20 Q. — BEFORE THE RELEASE OF "BLURRED 21 LINES"? 22 A. NO. 23 Q. OKAY. DID PHARRELL WILLIAMS EVER 24 TELL YOU THAT WHEN HE WAS WORKING ON "BLURRED 25 LINES," THAT HE WAS TRYING TO PRETEND THAT HE WAS 26 Q. HAVE YOU EVER HEARD THAT BEFORE? 27 A. NO. 28 Q. HAVE YOU EVER HEARD THAT BEFORE? 29 A. NO. 20 Q. HAVE YOU EVER HEARD THAT BEFORE? 20 A. NO. 21 THE DEPONENT: OKAY. 22 BY MR. BUSCH: 23 Q. WHEN THE INITIAL TRACKS, THE MUSIC 24 A. NO. 25 Q. HAVE YOU EVER HEARD THAT BEFORE? 26 Q. DID THE RECORD COMPANY OR ANY 27 A. YES. 28 A. YEAH. AND YOU'RE SAYING "UNABLE TO BARTICIPATE." I OBVIOUSY SANG THE WHOLE SONG. A. YEA. A	
12 MR. KING: OBJECTION; 13 ARGUMENTATIVE. 14 BY MR. BUSCH: 15 Q. DO YOU KNOW WHETHER THERE WAS ANY 16 ANALYSIS OR MUSICOLOGIST BROUGHT ON BEFORE THIS 17 LAWSUIT WAS FILED TO COMPARE "BLURRED LINES" AND 18 "GOT TO GIVE IT UP" 19 A. NO. 20 Q BEFORE THE RELEASE OF "BLURRED 21 LINES"? 22 A. NO. 23 Q. OKAY. DID PHARRELL WILLIAMS EVER 24 TELL YOU THAT WHEN HE WAS WORKING ON "BLURRED 25 LINES," THAT HE WAS TRYING TO PRETEND THAT HE WAS 26 Q. HAVE YOU EVER HEARD THAT BEFORE? 27 A. NO. 28 WARRUIT WAS FILED TO COMPANY OR ANY 29 D. A. NO. 20 Q BEFORE THE RELEASE OF "BLURRED LINES" AND LINES"? 20 Q BEFORE THE RELEASE OF "BLURRED LINES" AND LINES"? 21 A. NO. 22 A. NO. 23 Q. OKAY. DID PHARRELL WILLIAMS EVER 24 TELL YOU THAT WHEN HE WAS WORKING ON "BLURRED LINES," THAT HE WAS TRYING TO PRETEND THAT HE WAS 20 D. HAVE YOU EVER HEARD THAT BEFORE? 3 Q. HAVE YOU EVER HEARD THAT BEFORE? 4 A. NEVER. 5 Q. DID THE RECORD COMPANY OR ANY 5 A. YEAH. AND YOU'RE SAYING "UNABLE TO PARTICIPATE." I OBVIOUSLY SANG THE WHOLE SONG. 142 C. WHEN THE WHOLE SAYING "UNABLE TO PARTICIPATE." I OBVIOUSLY SANG THE WHOLE SONG. 144 Q. MY QUEMY - WHAT WHAT WHAT YOU SAID WASN'T A. YES. 15 A. YES. 16 A. YES. A. YES. A. YEAH. AND YOU'RE SAYING "UNABLE TO PARTICIPATE." I OBVIOUSLY SANG THE WHOLE SONG. 145 Q. MY QUEMY - WHAT WHAT WHAT YOU SAID WASN'T A. YES.	
13 ARGUMENTATIVE. 14 BY MR. BUSCH: 15 Q. DO YOU KNOW WHETHER THERE WAS ANY 16 ANALYSIS OR MUSICOLOGIST BROUGHT ON BEFORE THIS 17 LAWSUIT WAS FILED TO COMPARE "BLURRED LINES" AND 18 "GOT TO GIVE IT UP" 18 "GOT TO GIVE IT UP" 19 A. NO. 20 Q BEFORE THE RELEASE OF "BLURRED 21 LINES"? 22 A. NO. 23 Q. OKAY. DID PHARRELL WILLIAMS EVER 24 TELL YOU THAT WHEN HE WAS WORKING ON "BLURRED 25 LINES," THAT HE WAS TRYING TO PRETEND THAT HE WAS 16 A. NO. 17 AND THE RECORD. 18 A. OKAY. 19 A. NO. 20 BUT THAT 21 AND WR. KING: WELL, THEN, JUST ASK HIM 22 A. NO. 23 MR. BUSCH: WELL, I JUST HEARD 24 TELL YOU THAT WHEN HE WAS WORKING ON "BLURRED 25 LINES," THAT HE WAS TRYING TO PRETEND THAT HE WAS 26 A. NO. 27 THE DEPONENT: OKAY. 28 BY MR. BUSCH: 29 A. NO. 20 MR. BUSCH: WELL, I JUST HEARD 21 LINES," THAT HE WAS TRYING TO PRETEND THAT HE WAS 25 WHEN THE INITIAL TRACKS, THE MUSIC 26 A. NO. 27 D. HAVE YOU EVER HEARD THAT BEFORE? 28 A. NO. 29 Q. WHEN THE INITIAL TRACKS, THE MUSIC 30 Q. WHEN THE INITIAL TRACKS, THE MUSIC 41 FOR "BLURRED LINES," WAS BEING LAID DOWN 42 A. YES.	
14 BY MR. BUSCH: 15 Q. DO YOU KNOW WHETHER THERE WAS ANY 16 ANALYSIS OR MUSICOLOGIST BROUGHT ON BEFORE THIS 17 LAWSUIT WAS FILED TO COMPARE "BLURRED LINES" AND 18 "GOT TO GIVE IT UP" 19 A. NO. 20 Q BEFORE THE RELEASE OF "BLURRED 21 LINES"? 22 A. NO. 23 Q. OKAY. DID PHARRELL WILLIAMS EVER 24 TELL YOU THAT WHEN HE WAS WORKING ON "BLURRED 25 LINES," THAT HE WAS TRYING TO PRETEND THAT HE WAS 142 MARVIN GAYE? 2 A. NO. 3 Q. HAVE YOU EVER HEARD THAT BEFORE? 4 A. NEVER. 5 Q. DID THE RECORD COMPANY OR ANY 5 A. YES. 14 Q. MY QUE MY WHAT WHAT YOU 25 SAID WASN'T 26 A. YES. 27 A. NO. 28 A. OKAY. 19 Q. AND IT'S ON THE RECORD. 18 A. OKAY. 19 Q. AND IT'S ON THE RECORD. 18 A. OKAY. 19 Q. BUT THAT 20 MR. KING: WELL, THEN, JUST ASK HIM 21 A NEW QUESTION. DON'T ASK HIM TO TELL YOU WHAT IS SAID. 22 SAID. 23 MR. BUSCH: 24 SOMETHING THAT I WASN'T THAT SEEMED A BIT INCONSISTENT A SECOND AGO. 25 INCONSISTENT A SECOND AGO. 26 WHEN THE INITIAL TRACKS, THE MUSIC 27 A. NO. 3 Q. HAVE YOU EVER HEARD THAT BEFORE? 4 A. NEVER. 5 Q. DID THE RECORD COMPANY OR ANY 5 A. YES.	
15 Q. DO YOU KNOW WHETHER THERE WAS ANY 16 ANALYSIS OR MUSICOLOGIST BROUGHT ON BEFORE THIS 17 LAWSUIT WAS FILED TO COMPARE "BLURRED LINES" AND 18 "GOT TO GIVE IT UP" 19 A. NO. 20 Q BEFORE THE RELEASE OF "BLURRED 21 LINES"? 22 A. NO. 23 Q. OKAY. DID PHARRELL WILLIAMS EVER 24 TELL YOU THAT WHEN HE WAS WORKING ON "BLURRED 25 LINES," THAT HE WAS TRYING TO PRETEND THAT HE WAS 16 AND. 27 A. NO. 28 A. NO. 29 A. NO. 20 BUT THAT 20 MR. KING: WELL, THEN, JUST ASK HIM 21 A NEW QUESTION. DON'T ASK HIM TO TELL YOU WHAT I 22 SAID. 23 MR. BUSCH: WELL, I JUST HEARD 24 SOMETHING THAT I WASN'T THAT SEEMED A BIT INCONSISTENT A SECOND AGO. 142 1 MARVIN GAYE? 2 A. NO. 3 Q. HAVE YOU EVER HEARD THAT BEFORE? 4 A. NEVER. 5 Q. DID THE RECORD COMPANY OR ANY 5 A. YES.	
16 ANALYSIS OR MUSICOLOGIST BROUGHT ON BEFORE THIS 17 LAWSUIT WAS FILED TO COMPARE "BLURRED LINES" AND 18 "GOT TO GIVE IT UP" 19 A. NO. 20 Q BEFORE THE RELEASE OF "BLURRED 21 LINES"? 22 A. NO. 23 Q. OKAY. DID PHARRELL WILLIAMS EVER 24 TELL YOU THAT WHEN HE WAS WORKING ON "BLURRED 25 LINES," THAT HE WAS TRYING TO PRETEND THAT HE WAS 26 A. NO. 27 A. NO. 28 MARVIN GAYE? 29 MARVIN GAYE? 20 MR. BUSCH: WELL, I JUST HEARD 21 MARVIN GAYE? 22 A. NO. 23 Q. HAVE YOU EVER HEARD THAT BEFORE? 24 A. NO. 25 Q. HAVE YOU EVER HEARD THAT BEFORE? 26 A. NEVER. 27 MARVIN GAYE? 28 MARVIN GAYE? 29 MARVIN GAYE? 20 MR. BUSCH: WELL, I JUST HEARD 21 INCONSISTENT A SECOND AGO. 29 MR. BUSCH: WELL, I JUST HEARD 20 MR. BUSCH: WELL, I JUST HEARD 21 INCONSISTENT A SECOND AGO. 22 BY MR. BUSCH: WELL, I JUST HEARD 23 MR. BUSCH: WELL, I JUST HEARD 24 SOMETHING THAT I WASN'T THAT SEEMED A BIT INCONSISTENT A SECOND AGO. 20 MARVIN GAYE? 21 THE DEPONENT: OKAY. 22 BY MR. BUSCH: WHEN THE INITIAL TRACKS, THE MUSIC AND METAL TRACKS.	
17 LAWSUIT WAS FILED TO COMPARE "BLURRED LINES" AND 18 "GOT TO GIVE IT UP" 19 A. NO. 20 Q BEFORE THE RELEASE OF "BLURRED 21 LINES"? 22 A. NO. 23 Q. OKAY. DID PHARRELL WILLIAMS EVER 24 TELL YOU THAT WHEN HE WAS WORKING ON "BLURRED 25 LINES," THAT HE WAS TRYING TO PRETEND THAT HE WAS 26 MARVIN GAYE? 27 A. NO. 28 MARVIN GAYE? 29 MARVIN GAYE? 20 MR. BUSCH: WELL, I JUST HEARD 21 SOMETHING THAT I WASN'T THAT SEEMED A BIT INCONSISTENT A SECOND AGO. 142 1 MARVIN GAYE? 2 A. NO. 3 Q. HAVE YOU EVER HEARD THAT BEFORE? 4 A. NEVER. 5 Q. DID THE RECORD COMPANY OR ANY 5 A. YES.	
18 "GOT TO GIVE IT UP" 19 A. NO. 20 Q BEFORE THE RELEASE OF "BLURRED 21 LINES"? 22 A. NO. 23 Q. OKAY. DID PHARRELL WILLIAMS EVER 24 TELL YOU THAT WHEN HE WAS WORKING ON "BLURRED 25 LINES," THAT HE WAS TRYING TO PRETEND THAT HE WAS 142 1 MARVIN GAYE? 2 A. NO. 2 BUT THAT 3 Q. HAVE YOU EVER HEARD THAT BEFORE? 4 A. NEVER. 5 Q. DID THE RECORD COMPANY OR ANY 18 A. OKAY. 19 Q. BUT THAT MR. KING: WELL, THEN, JUST ASK HIM 20 MR. KING: WELL, THEN, JUST ASK HIM 21 A NEW QUESTION. DON'T ASK HIM TO TELL YOU WHAT I 22 SAID. 23 MR. BUSCH: WELL, I JUST HEARD 24 SOMETHING THAT I WASN'T THAT SEEMED A BIT INCONSISTENT A SECOND AGO. 142 1 THE DEPONENT: OKAY. 2 BY MR. BUSCH: 3 Q. WHEN THE INITIAL TRACKS, THE MUSIC 4 FOR "BLURRED LINES," WAS BEING LAID DOWN A. YES.	
18 "GOT TO GIVE IT UP" 19 A. NO. 20 Q BEFORE THE RELEASE OF "BLURRED 21 LINES"? 22 A. NO. 23 Q. OKAY. DID PHARRELL WILLIAMS EVER 24 TELL YOU THAT WHEN HE WAS WORKING ON "BLURRED 25 LINES," THAT HE WAS TRYING TO PRETEND THAT HE WAS 142 1 MARVIN GAYE? 2 A. NO. 2 BUT THAT 20 MR. KING: WELL, THEN, JUST ASK HIM 21 A NEW QUESTION. DON'T ASK HIM TO TELL YOU WHAT II 22 SAID. 23 MR. BUSCH: WELL, I JUST HEARD 24 SOMETHING THAT I WASN'T THAT SEEMED A BIT 25 INCONSISTENT A SECOND AGO. 142 1 MARVIN GAYE? 2 A. NO. 2 BY MR. BUSCH: 3 Q. WHEN THE INITIAL TRACKS, THE MUSIC 4 FOR "BLURRED LINES," WAS BEING LAID DOWN 4 A. NEVER. 5 Q. DID THE RECORD COMPANY OR ANY 5 A. YES.	
19 A. NO. 20 Q BEFORE THE RELEASE OF "BLURRED 21 LINES"? 22 A. NO. 23 Q. OKAY. DID PHARRELL WILLIAMS EVER 24 TELL YOU THAT WHEN HE WAS WORKING ON "BLURRED 25 LINES," THAT HE WAS TRYING TO PRETEND THAT HE WAS 26 A. NO. 27 THAT HE WAS TRYING TO PRETEND THAT HE WAS 27 THAT HE WAS TRYING TO PRETEND THAT HE WAS 28 SOMETHING THAT I WASN'T THAT SEEMED A BIT INCONSISTENT A SECOND AGO. 142 1 MARVIN GAYE? 2 A. NO. 3 Q. HAVE YOU EVER HEARD THAT BEFORE? 4 A. NEVER. 5 Q. DID THE RECORD COMPANY OR ANY 5 A. YES.	
20 Q BEFORE THE RELEASE OF "BLURRED 21 LINES"? 22 A. NO. 23 Q. OKAY. DID PHARRELL WILLIAMS EVER 24 TELL YOU THAT WHEN HE WAS WORKING ON "BLURRED 25 LINES," THAT HE WAS TRYING TO PRETEND THAT HE WAS 142 1 MARVIN GAYE? 2 A. NO. 2 SAID. 23 MR. BUSCH: WELL, I JUST HEARD 24 SOMETHING THAT I WASN'T THAT SEEMED A BIT INCONSISTENT A SECOND AGO. 142 1 MARVIN GAYE? 2 A. NO. 3 Q. HAVE YOU EVER HEARD THAT BEFORE? 4 A. NEVER. 5 Q. DID THE RECORD COMPANY OR ANY 5 A. YES.	
21 LINES"? 22 A. NO. 23 Q. OKAY. DID PHARRELL WILLIAMS EVER 24 TELL YOU THAT WHEN HE WAS WORKING ON "BLURRED 25 LINES," THAT HE WAS TRYING TO PRETEND THAT HE WAS 1 MARVIN GAYE? 2 A. NO. 3 Q. HAVE YOU EVER HEARD THAT BEFORE? 4 A. NEVER, 5 Q. DID THE RECORD COMPANY OR ANY 21 A NEW QUESTION. DON'T ASK HIM TO TELL YOU WHAT I SAID. 22 SAID. 23 MR. BUSCH: WELL, I JUST HEARD 24 SOMETHING THAT I WASN'T THAT SEEMED A BIT INCONSISTENT A SECOND AGO. 142 1 THE DEPONENT: OKAY. 2 BY MR. BUSCH: 3 Q. WHEN THE INITIAL TRACKS, THE MUSIC FOR "BLURRED LINES," WAS BEING LAID DOWN A. YES.	
22 SAID. 23 Q. OKAY. DID PHARRELL WILLIAMS EVER 24 TELL YOU THAT WHEN HE WAS WORKING ON "BLURRED 25 LINES," THAT HE WAS TRYING TO PRETEND THAT HE WAS 142 1 MARVIN GAYE? 2 A. NO. 3 Q. HAVE YOU EVER HEARD THAT BEFORE? 4 A. NEVER, 5 Q. DID THE RECORD COMPANY OR ANY 2 SAID. 23 MR. BUSCH: WELL, I JUST HEARD 24 SOMETHING THAT I WASN'T THAT SEEMED A BIT INCONSISTENT A SECOND AGO. 142 2 SAID. 3 MR. BUSCH: WELL, I JUST HEARD 4 BY MR. BUSCH: OKAY. 5 Q. WHEN THE INITIAL TRACKS, THE MUSIC 4 FOR "BLURRED LINES," WAS BEING LAID DOWN 5 A. YES.	<u>-</u>
Q. OKAY. DID PHARRELL WILLIAMS EVER TELL YOU THAT WHEN HE WAS WORKING ON "BLURRED LINES," THAT HE WAS TRYING TO PRETEND THAT HE WAS LINES," THAT HE WAS TRYING TO PRETEND THAT HE WAS LINES," THAT HE WAS TRYING TO PRETEND THAT HE WAS LINES," THAT HE WAS TRYING TO PRETEND THAT HE WAS LINES," THAT HE WAS TRYING TO PRETEND THAT HE WAS LINES," THAT HE WAS TRYING TO PRETEND THAT HE WAS LINES," THAT HE WASN'T THAT SEEMED A BIT INCONSISTENT A SECOND AGO. 142 LINES," THE DEPONENT: OKAY. BY MR. BUSCH: BY MR. BUSCH: Q. WHEN THE INITIAL TRACKS, THE MUSIC FOR "BLURRED LINES," WAS BEING LAID DOWN A. YES.	=
24 TELL YOU THAT WHEN HE WAS WORKING ON "BLURRED 25 LINES," THAT HE WAS TRYING TO PRETEND THAT HE WAS 25 INCONSISTENT A SECOND AGO. 142 1 MARVIN GAYE? 2 A. NO. 3 Q. HAVE YOU EVER HEARD THAT BEFORE? 4 A. NEVER. 5 Q. DID THE RECORD COMPANY OR ANY 2 SOMETHING THAT I WASN'T THAT SEEMED A BIT INCONSISTENT A SECOND AGO. 24 SOMETHING THAT I WASN'T THAT SEEMED A BIT INCONSISTENT A SECOND AGO. 25 INCONSISTENT A SECOND AGO. 26 BY MR. BUSCH: 27 Q. WHEN THE INITIAL TRACKS, THE MUSIC FOR "BLURRED LINES," WAS BEING LAID DOWN A. YES.	
25 LINES," THAT HE WAS TRYING TO PRETEND THAT HE WAS 142 1 MARVIN GAYE? 2 A. NO. 3 Q. HAVE YOU EVER HEARD THAT BEFORE? 4 A. NEVER. 5 Q. DID THE RECORD COMPANY OR ANY 2 INCONSISTENT A SECOND AGO. 142 1 THE DEPONENT: OKAY. 2 BY MR. BUSCH: 3 Q. WHEN THE INITIAL TRACKS, THE MUSIC 4 FOR "BLURRED LINES," WAS BEING LAID DOWN 5 A. YES.	
1 MARVIN GAYE? 1 MARVIN GAYE? 2 A. NO. 3 Q. HAVE YOU EVER HEARD THAT BEFORE? 4 A. NEVER. 5 Q. DID THE RECORD COMPANY OR ANY 1 THE DEPONENT: OKAY. 2 BY MR. BUSCH: 3 Q. WHEN THE INITIAL TRACKS, THE MUSIC 4 FOR "BLURRED LINES," WAS BEING LAID DOWN 5 A. YES.	
1 MARVIN GAYE? 2 A. NO. 3 Q. HAVE YOU EVER HEARD THAT BEFORE? 4 A. NEVER. 5 Q. DID THE RECORD COMPANY OR ANY 5 A. YES. 1 THE DEPONENT: OKAY. 2 BY MR. BUSCH: 3 Q. WHEN THE INITIAL TRACKS, THE MUSIC 4 FOR "BLURRED LINES," WAS BEING LAID DOWN	
1 MARVIN GAYE? 2 A. NO. 3 Q. HAVE YOU EVER HEARD THAT BEFORE? 4 A. NEVER. 5 Q. DID THE RECORD COMPANY OR ANY 1 THE DEPONENT: OKAY. 2 BY MR. BUSCH: 3 Q. WHEN THE INITIAL TRACKS, THE MUSIC 4 FOR "BLURRED LINES," WAS BEING LAID DOWN 5 A. YES.	14
2 A. NO. 3 Q. HAVE YOU EVER HEARD THAT BEFORE? 4 A. NEVER. 5 Q. DID THE RECORD COMPANY OR ANY 5 A. YES. 1 THE DEPONENT: ORAY. 2 BY MR. BUSCH: 3 Q. WHEN THE INITIAL TRACKS, THE MUSIC 4 FOR "BLURRED LINES," WAS BEING LAID DOWN	************
3 Q. HAVE YOU EVER HEARD THAT BEFORE? 3 Q. WHEN THE INITIAL TRACKS, THE MUSIC 4 A. NEVER. 4 FOR "BLURRED LINES," WAS BEING LAID DOWN 5 Q. DID THE RECORD COMPANY OR ANY 5 A. YES.	
4 A. NEVER. 4 FOR "BLURRED LINES," WAS BEING LAID DOWN 5 Q. DID THE RECORD COMPANY OR ANY 5 A. YES.	i
4 A. NEVER. 5 Q. DID THE RECORD COMPANY OR ANY 5 A. YES. 4 FOR "BLURRED LINES," WAS BEING LAID DOWN	
5 Q. DID THE RECORD COMPANY OR ANY 5 A. YES.	
6 OTHERS ON YOUR TEAM SUGGEST ANY CHANGES TO CONTROL OF THE PROPERTY OF THE PR	
IN THE STUDIO?	
7 "BLURRED LINES" BEFORE ITS RELEASE IN ANY WAY, 7 A. I WALKED IN WHILE HE WAS ALMOST	
8 SHAPE OR FORM? 8 FINISHED WITH THE MUSIC. SO IT WOULD HE WAS,	
9 A. NO, SIR. 9 I'D SAY 75 PERCENT OF IT WAS ALREADY	
10 Q. OKAY. DO YOU BELIEVE "BLURRED 10 DONE WHEN I WALKED IN AND HE WAS FINISHING IT A	, I
11 LINES" SOUNDS LIKE BLUEGRASS? 11 GOING "HEY, HEY, HEY" OR SOMETHING LIKE THAT.	ט
12 A PM NOT FAMILIAD METHOD AND	
12 LIKE I SAID, I WAS DRUNK. I JUST	- 1
100 THALKED IN AND THE ALKEADT HAD IT STAKTED	
15 DENTATIONIO NA DIVIDANCIO	٠
10 A NO L NO L LIVOURD TAKE	ŀ
THE THE PARTY OF T	- 1
10 ON THE BOOK OF	
TO THE BOOTH AND HE D HAVE THE NEXT FOUR LINES, A	o
TO WALK DACK IN, AND THEN HE DIRACE THE CHOKUS	
20 JUST WANT TO KIND OF UNDERSTAND IF YOU KNOW 20 AND I'D WALK BACK IN.	
21 WHAT WHAT, IF ANY, ROLE THEY HAD IN THE 21 HE HE WAS JUST RAPID FIRE.	
22 CREATION OF "BLURRED LINES." 22 Q. AND YOU SAID EARLIER HE WAS DOING	
23 A. OKAY. 23 THIS ALL ON HIS OWN?	
Q. BEFORE I DO THAT, HOWEVER, BEFORE 24 A. YES. THE ONLY PARTS I CAME UP WITH	
25 LUNCH, I HEARD YOU TO SAY THAT YOU WERE THERE, 25 WAS THE MELODY OF THE SECOND VERSE, "DOO, DOO	
 	
143	



Kelli Norden and Associates Court Reporters 310.820.7733 phone 310.820.7933 fax 11833 W. Olympic Bouleverd Suite 680E Los Angeles, California 9006+ kna@kellinorden.com www.kellinorden.com

-	O OKAY ALI BIOLE LETTO CUANOR		
$\frac{1}{2}$	Q. OKAY. ALL RIGHT. LET'S CHANGE	1	Q. AND SO IS HE THE SAME AS YOUR
	SUBJECTS HERE FOR A MOMENT.	2	PERSONAL ASSISTANT IN 2013?
3	A. OKAY.	3	A. YES, SIR.
4	Q. AND LET'S GO TO THE SONG "LOVE	4	Q. WHEN YOUR INTERVIEWS WERE DONE?
5	AFTER WAR"	5	A. YES.
6	A. UH-HUH.	6	Q. OKAY.
7	Q AND "AFTER THE DANCE."	7	A. AND HE CAN VERIFY MY PROBLEM VERY
8	HAVE YOU LISTENED TO "LOVE AFTER	8	CLEARLY.
9	WAR" AND "AFTER THE DANCE"?	9	Q. WHAT IS HIS ADDRESS?
10	A. RECENTLY, FOR ANY REASON? NO.	10	A. I DON'T HAVE IT UPON ME.
11,	Q. ARE YOU FAMILIAR WITH MARVIN GAYE'S	11	Q. ALL RIGHT,
12	SONG "AFTER THE DANCE"?	12	A. BUT I COULD GIVE YOU HIS PHONE
13	A. YES.	13	NUMBER.
14	Q. OKAY. HOW ARE YOU FAMILIAR WITH	14	Q. WHAT'S HIS PHONE NUMBER?
1.5	IT?	15	A. 616
16	A. IT'S A CLASSIC.	16	Q. UH-HUH.
17	Q. HAVE YOU, SINCE THE MATTER WAS	17	A 460
18	BROUGHT TO YOUR ATTENTION THAT THIS LAWSUIT	1.8	Q. UH-HUH.
19	INVOLVES THAT SONG	19	A 0874.
20	A. UH-HUH.	20	Q. OKAY.
21	Q HAVE YOU LISTENED TO THE TWO	21	MR. KING: WHY DON'T YOU GIVE THEM
22	SONGS TO SEE IF YOU BELIEVE THEY CONTAIN ANY	22	MY PHONE NUMBER?
23	SUBSTANTIALLY SIMILAR MATERIAL?	23	MR. BUSCH: 1 GOT YOUR I KNOW
24	A. NO, I KNOW THEM BOTH BY HEART. I	24	HOW TO GET IN TOUCH WITH YOU.
25	COULD PLAY AND SING THEM FOR YOU ON THE PIANO	25	MR. KING: GOOD DEAL. AND ON
		2.5	WIR. KING. GOOD BEAL. AND ON
	154		156
1	AND AND THERE'S NO SIMILARITIES AT ALL.	1	MR. BUSCH: LET'S
2	Q. OKAY.	2	MR. KING: MY PRIVATE LINE,
3	A. YOU GUYS DON'T HAVE A CHANCE ON	3	MR. BUSCH: LET'S GO OFF THE RECORD
4	THAT ONE. THAT'S JUST THOSE TWO ARE JUST NOT	4	FOR FIVE MINUTES, PLEASE.
5	EVEN CLOSE.	5	MR. KING: OKAY.
6	Q. OH, YOU SAID THAT YOUR PERSONAL	6	THE VIDEOGRAPHER: WE'LL GO OFF THE
7	ASSISTANT	7	RECORD AT 3:01 P.M. 3:01.
8	A, YES.	8	AND THAT'S OFF.
9	Q GOING BACK TO THE DRUG AND	9	(WHEREUPON, A RECESS WAS HELD
10	ALCOHOL	10	FROM 3:01 P.M. TO 3:14 P.M.)
11	A. YEAH,	11	(WHEREUPON, THE PROCEEDINGS CONTINUED
12	Q AND I APOLOGIZE FOR THAT FOR A	12	WITHOUT THE PRESENCE OF MR. ROBERTS.)
13	SECOND	13	THE VIDEOGRAPHER: AND WE'RE BACK
14	A. NO.	14	ON THE VIDEOTAPE RECORD AT 3:14 P.M.
15	Q BUT I DO NEED TO GO BACK TO	15	BY MR. BUSCH:
16	THAT.	16	Q. DO YOU KEEP, MR. THICKE, YOUR PRO
17	A. NO, THAT'S FINE.	17	TOOLS FILES OR SKETCHES AND REVISIONS?
18	Q. YOU SAID THAT YOUR	18	A. MOST OF THEM. SOMETIMES I RECORD
19	A. IT'S ALL IN THE NEW ALBUM.	19	WITH A DIFFERENT ENGINEER IF I GO TO USE A
20	EVERYONE'S GOING TO KNOW, ANYWAY. YOU GUYS ARE	20	DIFFERENT STUDIO, BUT THE MAJORITY OF MY MUSIC IS
21	JUST THE FIRST.	21	RECORDED AT HOME ON MY HOME COMPUTER.
22	Q. YOU SAID THAT YOUR PERSONAL	22	Q. OKAY, WAS IT YOUR IDEA TO FILE
23	ASSISTANT WAS AWARE OF YOUR DRUGS AND YOUR	23	THIS LAWSUIT?
24	DRINKING, WHAT IS YOUR PERSONAL ASSISTANT'S NAME?	24	A. NO.
25	A. ADAM DAGLOW,	25	Q. WHOSE IDEA WAS IT?
			S. THIODEREN INTO IT
	155		157



Kelli Norden and Associates Court Reporters 310.820.7733 phone 310.820.7933 fax 11835 W. Olympic Boulevard Suite 680E Los Angeles, California 90064 kna@kellinorden.com

1	A. MY MANAGER'S AND THE AND	1	Q. WHO ON YOUR TEAM WOULD I NEED TO
2	LAWYER'S.	2	QUESTION TO UNDERSTAND ALL THE INFORMATION?
3	Q. HAVE YOU EVER SEEN THE ANY	3	A. THAT WOULD BE I HAVE A FEELING
4	LETTERS WRITTEN TO YOU OR UNIVERSAL RECORDS ABOUT	4	THAT WOULD GO THROUGH MY BUSINESS MANAGER BECAUSE
5	THE GAYE FAMILY BELIEVING THAT BLURRED LINES	5	THEY THEY KNOW WHERE WHERE THE MONEY COMES
6	COPIED "GOT TO GIVE IT UP"?	6	THROUGH. I NORMALLY SEE THE BOTTOM LINE OF THIS
7	A. I DON'T RECALL SEEING ANY LETTERS	7	MONEY CAME IN AND THIS MONEY CAME IN, BUT I DON'T
8	COME MY WAY PERSONALLY; HOWEVER, ONCE THE LAWSUIT	8	KNOW THE SPECIFIC REASON REASON THAT CHECK
9	STARTED HAPPENING, I MIGHT HAVE SEEN SOMETHING.	9	
10	BUT I CANNOT RECALL	1 -	CAME.
II	Q. OKAY.	10	DO YOU KNOW WHAT I MEAN?
11		11	Q. IDO.
12	A ANY SPECIFIC LETTER THAT HAD TO	12	A. DOES THAT MAKE SENSE?
13	DO WITH THE GAYE FAMILY.	13	Q. WHO IS YOUR BUSINESS MANAGER?
14	Q. OKAY. "BLURRED LINES" HAS BEEN	14	A. GREG ROBINSON.
15	EXTREMELY COMMERCIALLY SUCCESSFUL; CORRECT?	15	Q. AND WHAT FIRM IS HE WITH?
16	(THE DEPONENT NODDED.)	16	A. I BELIEVE IT'S PERSONAL CAN I
17	BY MR. BUSCH;	17	AM I ALLOWED TO LOOK AT MY PHONE FOR THAT
18	Q. "YES"?	18	INFORMATION?
19	A. YEAH.	19	MR. KING: YES, IF YOU'D LIKE HIM
20	Q. IT'S BEEN CERTIFIED SIX TIMES	20	TO LOOK AT YOUR PHONE FOR EVERYTHING. OR YOU
21	PLATINUM BY THE R.I.A.A.?	21	COULD LEAVE IT IN YOUR POCKET.
22	A. YES, SIR.	22	THE DEPONENT: GREG ROBINSON.
23	Q. AND IT'S A NUMBER ONE HIT IN AT	23	SORRY.
24	LEAST 114 COUNTRIES; IS THAT RIGHT?	24	MR. KING: DIDN'T WE ALREADY GIVE
25	A. WOO,	25	THIS IN DISCOVERY? DON'T YOU HAVE THIS?
			THE MEDICAL PROPERTY OF THE PR
or open many array.	158		160
1	Q. MAYBE THE GAYES WILL BE SAYING THAT	_	MR RUCOU, NO
2	ONE DAY,	1	MR. BUSCH: NO.
3		2	THE DEPONENT: ROBINSON & COMPANY.
II	MR. KING: IS THAT A QUESTION?	3	BY MR. BUSCH:
4	MR. BUSCH: NO, IT WASN'T.	4	Q. WHAT IS THEIR ADDRESS?
5	BY MR. BUSCH:	5	A. 16 DEANS LANE, D-E-A-N-S, LANE,
6	Q. NOW, I ASKED YOU EARLIER YOUR	6	MONMOUTH JUNCTION, MONMOUTH JUNCTION, NEW JERSEY
7	KNOWLEDGE PERSONALLY ABOUT ROYALTIES, MECHANICAL	7	08852.
8	ROYALTIES AND ANY OTHER RECORD LABEL ROYALTIES,	8	Q. PHONE NUMBER?
9	ET CETERA.	9	A. I DON'T HAVE THAT. SORRY. I
10	A. YES.	10	JUST I JUST E-MAIL WITH THEM,
11	Q. YOU HAVE NO KNOWLEDGE OF THAT?	11	Q. IS "BLURRED LINES" YOUR BIGGEST
12	A. NO. THE WAY THAT	12	HIT?
13	MR. KING: YOU YOU YOU DON'T	13	A. YES.
14	HAVE TO EXPAND.	14	Q. BY FAR?
15	THE DEPONENT: OKAY, SORRY.	15	A. YES.
16	MR. KING: IT'S A "YES" OR "NO"	16	Q. WHAT IS NUMBER TWO?
17	(SPEAKING SIMULTANEOUSLY.)	17	A. THAT WOULD BE "LOST WITHOUT YOU,"
18	THE DEPONENT: WELL, I	18	Q. AND HOW MANY RECORDS HAS "LOST
19	MR. KING: QUESTION.	19	WITHOUT YOU" SOLD?
20	THE DEPONENT: I	20	A. I BELIEVE IT SOLD A MILLION COPIES,
21	BY MR. BUSCH:	21	AND THE ALBUM'S AROUND 2 MILLION.
22	Q. I DO NEED TO KNOW	22	
23	A. I DO I DO NOT HAVE SPECIFIC	23	Q. AND WHAT HAS "BLURRED LINES" SOLD?
24	KNOWLEDGE IF I HAVE EVEN RECEIVED A SINGLE DOLLAR	i	A. "BLURRED LINES" WORLDWIDE IS AT
25	FROM "BLURRED LINES."	24 25	12 AROUND 12 MILLION, AND THE ALBUM IS MAYBE
		∠5	GOLD.
	159		161
			101



Kelli Norden and Associates Court Reporters 310.820.7733 phone 310.820.7933 fax 1833 W. Olympic Boulevard Suite 6808 Los Angeles, California 90064 kna&kellinorden.com