

Exhibit 6

CONFIDENTIAL DEPOSITION OF ROBIN THICKE

1 UNITED STATES DISTRICT COURT
 2 CENTRAL DISTRICT OF CALIFORNIA, WESTERN DISTRICT
 3
 4 PHARRELL WILLIAMS, AN)
 INDIVIDUAL; ROBIN THICKE,)
 AN INDIVIDUAL; AND CLIFFORD)
 5 HARRIS, JR., AN INDIVIDUAL,)
 6)
 PLAINTIFFS,)
 7)
 VS.) CASE NO.
) CV13-08004-JAK(AGRX)
 8 BRIDGEPORT MUSIC, INC., A)
 MICHIGAN CORPORATION;)
 9 FRANKIE CHRISTIAN GAYE,)
 AN INDIVIDUAL; MARVIN GAYE)
 10 III, AN INDIVIDUAL; NONA)
 MARVISA GAYE, AN)
 11 INDIVIDUAL; AND DOES 1)
 THROUGH 10, INCLUSIVE,)
 12)
 DEFENDANTS.)
 13)
 14 AND RELATED COUNTERCLAIMS.)
 15)
 16 CONFIDENTIAL
 17 (PURSUANT TO PROTECTIVE ORDER, THE FOLLOWING
 TRANSCRIPT HAS BEEN DESIGNATED CONFIDENTIAL)
 18
 19 DEPOSITION OF ROBIN THICKE, TAKEN ON
 20 BEHALF OF THE DEFENDANTS, AT 1900 AVENUE
 21 OF THE STARS, 25TH FLOOR, LOS ANGELES,
 22 CALIFORNIA, COMMENCING AT 11:21 A.M.,
 23 WEDNESDAY, APRIL 23, 2014, BEFORE KELLI
 24 C. NORDEN, CSR NUMBER 7200.
 25

1 APPEARANCES (CONTINUED):
 2
 3 WARGO & FRENCH, L.L.P.
 BY: MARK L. BLOCK, ESQ.
 4 1888 CENTURY PARK EAST
 SUITE 1620
 5 LOS ANGELES, CALIFORNIA 90067
 310.853.6355
 6 MBLOCK@WARGOFRENCH.COM
 (NOT PRESENT)
 7
 8 FOR THE DEFENDANT MARVIN GAYE III:
 9
 10 LAW OFFICES OF DAVID RUDICH
 BY: DAVID RUDICH, ESQ.
 9288 SUNSET BOULEVARD
 11 SUITE 920
 LOS ANGELES, CALIFORNIA 90069
 12 310.550.8020
 DAVID@DAVIDRUDICH.COM
 (NOT PRESENT)
 13 - AND -
 14 LAW OFFICES OF PAUL N. PHILIPS, A.P.L.C.
 BY: PAUL N. PHILIPS, ESQ.
 15 9255 WEST SUNSET BOULEVARD
 SUITE 920
 16 WEST HOLLYWOOD, CALIFORNIA 90069
 323.813.1126
 PNP@PNPLEGAL.COM
 17
 18 FOR THE DEPONENT:
 19 ROBERTS LEIBOWITZ & HAFITZ
 BY: JAIMISON M. ROBERTS, ESQ.
 20 271 MADISON AVENUE
 21 20TH FLOOR
 22 NEW YORK, NEW YORK 10016
 23 212.871.9002
 24 JROBERTS@ROBERTSPLLC.COM
 (PAGES 39 - 53 AND 144 - 157)
 25

1 APPEARANCES OF COUNSEL:
 2
 3 FOR THE PLAINTIFFS:
 4 KING, HOLMES, PATERNO & BERLINER, L.L.P.
 BY: HOWARD E. KING, ESQ.
 5 SETH MILLER, ESQ.
 1900 AVENUE OF THE STARS
 6 25TH FLOOR
 LOS ANGELES, CALIFORNIA 90067
 7 310.282.8989
 KING@KHPBLAW.COM
 SMILLER@KHPBLAW.COM
 8
 9 FOR THE DEFENDANTS NONA MARVISA GAYE AND FRANKIE
 10 CHRISTIAN GAYE:
 11
 12 KING & BALLOW
 BY: RICHARD S. BUSCH, ESQ.
 315 UNION STREET
 13 SUITE 1100
 NASHVILLE, TENNESSEE 37201
 14 615.259.3456
 RBUSCH@KINGBALLOW.COM
 15
 16 - AND -
 17
 18 KING & BALLOW
 BY: PAUL H. DUVAL, ESQ.
 6540 LUSK BOULEVARD
 19 SUITE 250
 SAN DIEGO, CALIFORNIA 92121
 858.697.6000
 PDUVAL@KINGBALLOW.COM
 20 (NOT PRESENT)
 21 - AND -
 22
 23
 24
 25

1 APPEARANCE (CONTINUED):
 2
 3 ALSO PRESENT:
 4 ALASDAIR J. MC MULLAN
 UNIVERSAL MUSIC GROUP
 5
 6 CHRIS KNIGHT
 7
 8 JUDITH FINELL
 JUDITH FINELL MUSIC SERVICES, INC.
 MATT HALE, LEGAL ASSISTANT
 LAW OFFICES OF PAUL N. PHILIPS
 9
 10 TIMOTHY BARKER, VIDEOGRAPHER
 11 KELLI NORDEN AND ASSOCIATES
 12 MARLON ESTELLA, I.T.
 13
 14
 15
 16
 17
 18
 19
 20
 21
 22
 23
 24
 25

Kelli Norden and Associates
 Court Reporters
 310.820.7733 phone 310.820.7933 fax
 11335 W. Olympic Boulevard Suite 680E
 Los Angeles, California 90064
 kna@kellinorden.com www.kellinorden.com

CONFIDENTIAL DEPOSITION OF ROBIN THICKE

1 INDEX

2

3 DEPONENT: EXAMINED BY: PAGE:

4 ROBIN THICKE MR. BUSCH 10

5 (AFTERNOON SESSION) 84

6

7

8

9 EXHIBITS FOR IDENTIFICATION:

10 DEFENDANTS:

11 31 - PRELIMINARY EXPERT REPORT OF

12 JUDITH FINELL (18 PAGES) 59

13 32 - INTERROGATORY RESPONSES

14 (14 PAGES) 67

15 33 - SUPPLEMENTAL INTERROGATORIES

16 RESPONSES (28 PAGES) 70

17 34 - "G.Q. MAGAZINE" INTERVIEW OF

18 ROBIN THICKE DATED 5-7-13

19 (4 PAGES) 75

20 35 - "BILLBOARD" INTERVIEW OF ROBIN

21 THICKE DATED 7-9-13 (3 PAGES) 101

22 36 - FUSE T.V. INTERVIEW OF ROBIN

23 THICKE DATED 7-29-13 (2 PAGES) 105

24 37 - V.H.-1 MUSIC INTERVIEW OF

25 ROBIN THICKE (1 PAGE) 111

38 - "VEVO'S TWITTER TAKEOVER"

INTERVIEW OF ROBIN THICKE

(1 PAGE) 115

39 - "HOT 97" INTERVIEW OF ROBIN

THICKE (1 PAGE) 124

6

1 LOS ANGELES, CALIFORNIA, WEDNESDAY

2 APRIL 23, 2014

3 11:21 A.M.

4

5 THE VIDEOGRAPHER: AND GOOD

6 MORNING.

7 WE'RE ON THE VIDEOTAPE RECORD,

8 BEGINNING DISK NUMBER ONE OF VOLUME NUMBER 1 AT

9 11:21 A.M.

10 MY NAME IS TIM BARKER AND I'M THE

11 VIDEOTAPE OPERATOR. THE NAME OF MY EMPLOYER IS

12 KELLI NORDEN AND ASSOCIATES, LOCATED AT 11835 WEST

13 OLYMPIC BOULEVARD, SUITE NUMBER 680 EAST, L.A.,

14 CALIFORNIA 90064.

15 TODAY'S DATE IS APRIL THE 23RD,

16 2014.

17 THE LOCATION OF TODAY'S DEPOSITION

18 IS AT THE LAW OFFICES OF KING AND HOLMES, 1900

19 AVENUE OF THE STARS, 25TH FLOOR, L.A., CALIFORNIA

20 90067.

21 THE CASE CAPTION IS "WILLIAMS V.

22 BRIDGEPORT MUSIC." THE NAME OF THE WITNESS IS

23 ROBIN THICKE.

24 WILL COUNSEL PLEASE MAKE VERBAL

25 INTRODUCTIONS FOR THE RECORD.

8

1 INDEX (CONTINUED):

2

3 EXHIBITS FOR IDENTIFICATION:

4 DEFENDANTS:

5 40 - ROBIN THICKE T.M.Z. TRANSCRIPT

6 (1 PAGE) 131

7 41 - DEPOSITION D.V.D. TRACK LIST

8 (1 PAGE) AND D.V.D. 166

9

10 INFORMATION REQUESTED:

11 (NONE)

12

13

14

15

16 QUESTIONS UNANSWERED BY THE DEPONENT:

17 (NONE)

18

19

20

21

22

23

24

25

7

1 MR. BUSCH: RICHARD BUSH ON BEHALF

2 OF NONA AND FRANKIE GAYE.

3 MR. PHILIPS: PAUL PHILIPS ON

4 BEHALF OF MARVIN GAYE III.

5 MR. MILLER: SETH MILLER ON BEHALF

6 OF PLAINTIFFS AND COUNTER-DEFENDANTS.

7 MR. KING: HOWARD KING ON BEHALF OF

8 THE SAME PARTIES.

9 THE VIDEOGRAPHER: VERY GOOD.

10 AND WILL THE COURT REPORTER PLEASE

11 ADMINISTER THE OATH.

12

13 ROBIN THICKE,

14 CALLED AS A DEPONENT AND SWORN IN BY

15 THE DEPOSITION OFFICER, WAS EXAMINED

16 AND TESTIFIED AS FOLLOWS:

17

18 DEPOSITION OFFICER: WOULD YOU

19 RAISE YOUR RIGHT HAND.

20 THE DEPONENT: YES, MA'AM.

21 DEPOSITION OFFICER: DO YOU

22 SOLEMNLY AFFIRM THE TESTIMONY YOU ARE ABOUT TO

23 GIVE IN THE CAUSE NOW PENDING WILL BE THE TRUTH,

24 THE WHOLE TRUTH, AND NOTHING BUT THE TRUTH?

25 THE DEPONENT: YES.

9

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 www.kellinorden.com

CONFIDENTIAL DEPOSITION OF ROBIN THICKE

1 ABOUT IT --
 2 A. OKAY. OKAY.
 3 Q. -- AND HE WILL GIVE YOU AN
 4 INSTRUCTION. IF HE ULTIMATELY INSTRUCTS YOU NOT
 5 TO ANSWER THE QUESTION, I MIGHT DISAGREE.
 6 A. OKAY.
 7 Q. I CAN'T FORCE YOU, BECAUSE THERE'S
 8 NO JUDGE SITTING HERE, TO --
 9 A. RIGHT.
 10 Q. -- ANSWER A QUESTION YOU DON'T WANT
 11 TO ANSWER.
 12 A. RIGHT.
 13 Q. BUT I'LL MARK THE RECORD AND I
 14 MIGHT FILE A MOTION WITH THE COURT, INSTRUCTING
 15 THE COURT TO HAVE YOU ANSWER THE QUESTION.
 16 A. THAT MAKES SENSE. SO I STILL DON'T
 17 HAVE TO ANSWER ANY --
 18 Q. IF --
 19 A. -- QUESTION I DON'T WANT TO IF --
 20 Q. IF HE INSTRUCTS --
 21 A. -- AND YOU WOULD HAVE TO GO FILE
 22 WITH A COURT TO GET ME TO ANSWER THAT QUESTION.
 23 Q. IF HE INSTRUCTS YOU NOT TO ANSWER A
 24 QUESTION.
 25 A. ALL RIGHT. LET'S GET IT GOING.

14

1 TELL ME YOU NEED A BREAK AND I'LL BE HAPPY TO GIVE
 2 YOU A BREAK FOR AS LONG AS YOU NEED.
 3 A. OKAY.
 4 Q. THE ONLY THING I ASK IS THAT IF
 5 THERE IS A QUESTION PENDING, ANSWER MY QUESTION
 6 BEFORE YOU TAKE A BREAK.
 7 A. GOT IT.
 8 Q. ALL RIGHT. IS THERE ANY REASON WHY
 9 YOU CAN'T ANSWER MY QUESTIONS TODAY ACCURATELY AND
 10 HONESTLY? DO YOU -- ARE YOU UNDER ANY MEDICATION?
 11 NOT FEELING WELL?
 12 ANY REASON WHY YOU CAN'T ANSWER MY
 13 QUESTIONS HONESTLY AND ACCURATELY TODAY?
 14 A. NO, SIR.
 15 Q. OKAY. LASTLY, MR. THICKE, YOU CAME
 16 IN HERE. YOU'VE BEEN IN A GOOD MOOD TODAY,
 17 SPEAKING FRIENDLY. THAT'S ALL FINE. BUT I DO
 18 WANT TO -- I THINK IT'S MY OBLIGATION TO INSTRUCT
 19 YOU OF ONE THING SO YOU UNDERSTAND THE NATURE OF
 20 THIS.
 21 EVEN THOUGH WE'RE SITTING IN A
 22 COURT -- IN A CONFERENCE ROOM --
 23 A. UH-HUH.
 24 Q. -- IN YOUR LAWYER'S OFFICE --
 25 A. UH-HUH.

16

1 Q. OKAY. NOW, THE COURT REPORTER'S
 2 TRANSCRIPT IS THE OFFICIAL RECORD --
 3 A. YES.
 4 Q. -- OF TODAY'S DEPOSITION, SO IT'S
 5 VERY IMPORTANT THAT YOU AND I NOT SPEAK OVER ONE
 6 ANOTHER.
 7 A. GOT IT. SORRY.
 8 Q. SO I'LL TRY AND DO YOU THE COURTESY
 9 OF WAITING UNTIL YOU FINISH YOUR ANSWER BEFORE I
 10 ASK MY NEXT QUESTION.
 11 A. OKAY.
 12 Q. JUST TRY, EVEN IF YOU THINK YOU
 13 KNOW WHERE MY QUESTION IS GOING --
 14 A. GOT IT.
 15 Q. -- WAIT UNTIL I FINISH ASKING
 16 BEFORE YOU ANSWER. OKAY?
 17 ALL RIGHT. IF -- THAT'S MY NEXT
 18 INSTRUCTION, WHICH IS: THE COURT REPORTER CAN'T
 19 TAKE DOWN NODS, GESTURES, THUMBS UP, THUMBS DOWN.
 20 SO PLEASE ANSWER MY QUESTION VERBALLY.
 21 A. OKAY.
 22 Q. IF YOU NEED A BREAK --
 23 A. I UNDERSTAND.
 24 Q. OKAY. IF YOU NEED A BREAK DURING
 25 THE COURSE OF THE DEPOSITION, PLEASE FEEL FREE TO

15

1 Q. -- THE -- YOUR OBLIGATIONS TODAY TO
 2 TELL THE TRUTH ARE THE SAME AS IF WE WERE SITTING
 3 IN A COURT OF LAW.
 4 A. OF COURSE.
 5 Q. AND YOUR -- YOU'VE TOOK AN OATH TO
 6 TELL THE TRUTH, SO THIS IS A VERY SERIOUS
 7 MATTER --
 8 A. YES, SIR.
 9 Q. -- AND THE SAME PENALTIES FOR FALSE
 10 TESTIMONY WOULD APPLY JUST AS FORCEFULLY BASED ON
 11 YOUR TESTIMONY TODAY AS IF YOU WERE SITTING IN A
 12 COURT OF LAW, AND I WANT YOU TO FULLY UNDERSTAND
 13 THAT.
 14 A. ABSOLUTELY.
 15 Q. DO YOU UNDERSTAND THAT?
 16 A. YES, SIR.
 17 Q. OKAY. ALL RIGHT.
 18 ALL RIGHT. MR. THICKE, YOU ARE
 19 CREDITED AS ONE OF THE CO-WRITERS ON THE SONG
 20 "BLURRED LINES"; CORRECT?
 21 A. YES, SIR.
 22 Q. OKAY. AND I'VE DONE MY HOMEWORK.
 23 I'VE READ COMMENTS THAT YOU'VE MADE IN THE PAST
 24 ABOUT MARVIN GAYE'S SONG "GOT TO GIVE IT UP" --
 25 A. UH-HUH.

17

Kelli Norden and Associates
 Court Reporters
 310.820.7773 phone 310.820.7933 fax
 11835 W. Olympic Boulevard Suite 680E
 Los Angeles, California 90064
 kna@kellinorden.com www.kellinorden.com

CONFIDENTIAL DEPOSITION OF ROBIN THICKE

1 Q. -- BEING ONE OF YOUR FAVORITE
2 SONGS.
3 A. YES.
4 Q. OKAY. SO YOU'RE FAMILIAR WITH THE
5 SONG "GOT TO GIVE IT UP"?
6 A. YES, SIR.
7 Q. OKAY. I WANT TO PLAY FOR YOU NOW
8 SOME MUSIC, AND IT GOES BACK AND FORTH. IT'S KIND
9 OF LIKE A MASH-UP --
10 A. OKAY.
11 Q. -- BETWEEN "GOT TO GIVE IT UP" AND
12 "BLURRED LINES." I'M GOING TO PLAY THE WHOLE
13 THING. THERE'S BEEN EIGHT SEPARATE TRACKS HERE.
14 A. OKAY.
15 Q. AFTER I PLAY THESE, I'LL HAVE SOME
16 QUESTIONS FOR YOU, SO I WANT YOU TO LISTEN
17 CAREFULLY --
18 MR. KING: IS THIS SOMETHING THAT
19 IS AN EXHIBIT TO THE DEPOSITION?
20 MR. BUSCH: IT WILL BE.
21 (WHEREUPON, AUDIO CLIP PLAYED.)
22 THE DEPONENT: YOU KNOW, YOU CAN'T
23 PUT A MINOR MELODY OVER A MAJOR CHORD.
24 MR. KING: HE'LL ASK YOU QUESTIONS.
25 THE DEPONENT: IT'S IMPOSSIBLE FOR

18

1 MINOR SONG PLAYING AT THE SAME TIME.
2 OH, LORD.
3 DOES ANYONE HERE PLAY AN
4 INSTRUMENT? DOES ANYONE KNOW HOW IMPOSSIBLE IT IS
5 TO PLAY THESE TWO SONGS OVER THE TOP OF EACH
6 OTHER?
7 I'M SORRY.
8 MR. KING: JUST BEAR WITH IT.
9 THE DEPONENT: I KNOW.
10 MR. KING: AND HE'LL ASK YOU
11 QUESTIONS. YOU'LL GET ALL THE OPPORTUNITIES --
12 THE DEPONENT: IT'S LIKE NAILS ON A
13 FUCKING CHALKBOARD.
14 SAME THING. MAJOR OVER MINOR,
15 GUYS. TWO DIFFERENT TEMPOS.
16 YOU KNOW, YOU COULD DO THE SAME
17 THING WITH "ROAR" -- WITH KATIE PERRY'S "ROAR."
18 AH.
19 OH.
20 OH, HOW CAN YOU DO THIS TYPE OF
21 THING?
22 THIS IS -- YOU KNOW THE SCENE IN --
23 WHAT'S IT -- STANLEY KUBRICK'S MOVIE, "CLOCKWORK
24 ORANGE"? WHERE HE HAS TO SIT THERE AND WATCH
25 TERRIBLE INTERVIEWS AND LISTEN TO HIS FAVORITE

20

1 ME TO SIT AND LISTEN TO THAT.
2 BY MR. BUSCH:
3 Q. I NEED YOU TO LISTEN. PLEASE.
4 A. IT'S LIKE (INDICATING). DOESN'T
5 FIT MUSICALLY AT ALL.
6 OH, IT'S SO HARD TO LISTEN TO IT.
7 MAJOR/MINOR CLASHING. NOT SAME KEY.
8 OH, THAT'S HARD.
9 I WOULD THINK MY BAND WAS TONE
10 DEAF.
11 OH, YOU KNOW, YOU CAN'T DO THAT IN
12 MUSIC. IT'S IMPOSSIBLE.
13 Q. I'M GOING TO ASK YOU TO --
14 A. -- OVER THE TOP OF EACH OTHER.
15 IT'S IMPOSSIBLE MUSICALLY. I DON'T KNOW WHO --
16 WHAT MUSICIAN CAN EVEN LISTEN TO THIS WHILE A
17 MAJOR AND A MINOR ARE FIGHTING EACH OTHER.
18 THERE WE GO. GOING BACK TO HIS
19 SONG.
20 CAN'T DO THAT. MAJOR/MINOR.
21 MOZART WOULD BE ROLLING IN HIS
22 GRAVE RIGHT NOW.
23 OOF, TERRIBLE.
24 I WOULD RATHER HEAR YOU ASK ME
25 QUESTIONS FOR TWO HOURS THAN LISTEN TO A MAJOR AND

19

1 MUSIC?
2 MM.
3 GOD, I GOT TO STOP SMOKING. I WISH
4 I STILL SOUNDED LIKE THAT. WHAT A FUCKING VOICE.
5 MM.
6 CAN'T DO IT. CAN'T PLAY THE TWO OF
7 THEM OVER THE TOP OF EACH OTHER. IT'S MUSICALLY
8 IMPOSSIBLE. OH, GOD, THAT SOUNDS HORRIBLE.
9 IS THIS AN ANESTHESIA BEFORE THE
10 INTERVIEW STARTS?
11 MR. KING: YEAH.
12 THE DEPONENT: DO WE REALLY HAVE TO
13 SIT AND LISTEN TO THIS?
14 MR. KING: IT'S ALMOST OVER.
15 THE DEPONENT: OKAY. I FEEL LIKE
16 I'M IN THE DENTIST CHAIR.
17 MR. KING: YOU MAY HAVE ANSWERED
18 ALL OF HIS QUESTIONS ALREADY.
19 THE DEPONENT: JESUS CHRIST. IT'S
20 AN IMPOSSIBILITY, MUSICALLY.
21 MR. KING: OKAY. NOW LET'S WAIT
22 FOR A QUESTION.
23 THE DEPONENT: OKAY.
24 (CONCLUSION OF AUDIO CLIP.)
25 ///

21

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 www.kellinorden.com

CONFIDENTIAL DEPOSITION OF ROBIN THICKE

1 MR. BUSCH: THIS IS THE POINT.
 2 MR. KING: IT WON'T --
 3 THE DEPONENT: YEAH.
 4 MR. KING: IT WON'T HAPPEN THAT
 5 WAY.
 6 THE DEPONENT: OKAY. ASK ME THE
 7 NEXT ONE.
 8 BY MR. BUSCH:
 9 Q. ISN'T STEVIE WONDER A PERSONAL
 10 FRIENDS OF YOURS?
 11 A. NO, HE'S NOT, ACTUALLY.
 12 Q. DIDN'T YOU JUST SAY HE WAS A FRIEND
 13 OF YOURS?
 14 A. NO, I -- I -- HE'S AN ACQUAINTANCE.
 15 I'VE DONE HIS RADIO SHOW AND I'VE SEEN HIM AT A
 16 FEW PARTIES.
 17 Q. DON'T YOU THINK STEVIE WONDER -- DO
 18 YOU KNOW IF STEVIE WONDER -- IF STEVIE WONDER IS A
 19 FRIEND OF PHARRELL WILLIAMS?
 20 A. I DO NOT KNOW THAT.
 21 Q. DO YOU KNOW THERE ARE OTHER ARTISTS
 22 WHO'VE COME OUT PUBLICLY AND STATED THAT THEY DO
 23 SOUND NEARLY IDENTICAL, THAT ONE --
 24 (SPEAKING SIMULTANEOUSLY.)
 25 THE DEPONENT: I HAVE NEVER HEARD

26

1 THIS BEFORE?
 2 MR. KING: WHY SHOULD HE WAIT FOR
 3 YOU? HE DOESN'T WAIT FOR ME.
 4 THE DEPONENT: I DON'T GIVE A FUCK.
 5 I KNOW -- YOU KNOW, YOU ASKED THE QUESTION THREE
 6 TIMES. I DO NOT KNOW OF ANYBODY WHO HAS SAID THAT
 7 PUBLICLY. I DO NOT KNOW.
 8 BY MR. BUSCH:
 9 Q. YOU JUST SAID FORMIDABLE SONGWRITER
 10 WHO YOU RESPECT.
 11 WHAT I WANT TO KNOW IS: IS THERE
 12 ANYONE THAT YOU HAVE HEARD WHO HAS SAID THAT
 13 THEY'VE LISTENED TO THE TWO SONGS AND BELIEVE THAT
 14 "BLURRED LINES" IS A COPY OF "GOT TO GIVE IT UP"?
 15 A. HAVE YOU FINISHED ANSWER -- ASKING
 16 THAT QUESTION YET?
 17 Q. WHEN I STOP --
 18 A. THE ANSWER IS "NO."
 19 Q. OKAY. WHEN I STOP SPEAKING, YOU'LL
 20 KNOW I FINISHED MY QUESTION. OKAY?
 21 A. OKAY.
 22 Q. OKAY. NOW, YOU'RE TELLING ME --
 23 ONE DAY THIS CASE IS GOING TO GO BEFORE A JURY --
 24 SO YOU ASKED ME WHO "THEY" ARE?
 25 A. UH-HUH.

28

1 THAT.
 2 BY MR. BUSCH:
 3 Q. OKAY. YOU'VE NEVER HEARD THAT
 4 ONCE?
 5 A. I'VE NEVER HEARD --
 6 MR. KING: I OBJECT.
 7 THE DEPONENT: -- OF ANY -- ANY --
 8 ANY --
 9 MR. KING: I OBJECT.
 10 THE DEPONENT: YEAH?
 11 MR. KING: I OBJECT.
 12 THE DEPONENT: I HAVEN'T. I
 13 HAVEN'T HEARD OF ANY FORMIDABLE SONGWRITER OR
 14 ARTIST THAT I RESPECT THAT HAS SAID THAT, NO.
 15 BY MR. BUSCH:
 16 Q. OKAY. I'M NOT TALKING ABOUT A
 17 FORMIDABLE SONGWRITER THAT YOU RESPECT.
 18 I ASKED YOU: IS THERE IS ANYBODY
 19 THAT YOU HAVE HEARD PUBLICLY COME OUT AND --
 20 A. NO.
 21 Q. -- STATE THAT THEY'VE LISTENED
 22 TO --
 23 A. NO, NOT A SINGLE ONE.
 24 Q. YOU GOT TO WAIT UNTIL I FINISH
 25 ASKING MY QUESTION. REMEMBER, WE TALKED ABOUT

27

1 Q. I'M ABOUT TO TELL YOU WHO "THEY"
 2 ARE.
 3 MR. KING: OBJECTION; ASSUMES FACTS
 4 NOT IN EVIDENCE.
 5 BY MR. BUSCH:
 6 Q. OKAY. ONE DAY THIS CASE MAY GO TO
 7 A JURY --
 8 MR. KING: MUCH BETTER.
 9 BY MR. BUSCH:
 10 Q. -- AND THERE WILL BE A JURY OF YOUR
 11 PEERS WHO WILL LISTEN TO THIS MUSIC --
 12 A. YEAH.
 13 Q. -- AND WILL DECIDE WHETHER THEY
 14 BELIEVE THAT THE BASS LINE AND OTHER PARTS OF
 15 "BLURRED LINES" ARE SUBSTANTIALLY SIMILAR TO "GOT
 16 TO GIVE IT UP."
 17 I WANT YOU TO TELL ME WHETHER YOU
 18 BELIEVE THAT THE AVERAGE PERSON IN AN AUDIENCE,
 19 ORDINARY OBSERVER, COULD LISTEN TO THOSE TWO BASS
 20 LINES AND BELIEVE THAT THEY HAD ANYTHING -- THAT
 21 THEY SOUNDED REMOTELY THE SAME.
 22 YOU DON'T BELIEVE THAT THAT'S THE
 23 CASE?
 24 A. NO, I DO NOT.
 25 Q. OKAY. DID YOU TELL PHARRELL

29

Kelli Norden and Associates
 Court Reporters
 310.820.7733 phone 310.820.7933 fax
 11835 W. Olympic Boulevard Suite 660E
 Los Angeles, California 90064
 kna@kellinorden.com www.kellinorden.com

CONFIDENTIAL DEPOSITION OF ROBIN THICKE

1 WILLIAMS TO TRY TO CREATE SOMETHING THAT WAS LIKE
 2 "GOT TO GIVE IT UP?"
 3 A. NO, I--
 4 MR. KING: YOU'VE ANSWERED THE
 5 QUESTION. IT'S A "YES" OR "NO" QUESTION, PLEASE.
 6 THE DEPONENT: NO.
 7 MR. KING: HE'LL ASK YOU ALL THE
 8 QUESTIONS.
 9 THE DEPONENT: THAT'S FINE.
 10 MR. KING: YOU DON'T NEED TO --
 11 THE DEPONENT: THAT'S FINE.
 12 MR. KING: -- ANTICIPATE --
 13 MR. BUSCH: YEAH, PLEASE DO NOT
 14 INTERRUPT HIS ANSWER IN THE MIDDLE OF HIS ANSWER.
 15 HE WAS -- HE WAS IN THE MIDDLE OF ANSWERING IT
 16 AND YOU STOPPED HIM.
 17 MR. KING: YOU WOULD HAVE STRICKEN
 18 IT AS NONRESPONSIVE.
 19 (SPEAKING SIMULTANEOUSLY.)
 20 MR. BUSCH: MAYBE I--
 21 MR. KING: YOU ASKED HIM --
 22 MR. BUSCH: -- WOULD HAVE AND
 23 MAYBE --
 24 MR. KING: -- OR "NO" QUESTION.
 25 WELL, THAT'S OKAY. WE'RE GOING TO

30

1 GET THIS DOWN SO --
 2 THE DEPONENT: THE ANSWER IS "NO."
 3 MR. KING: ANSWER HIS QUESTIONS AS
 4 YOU HEAR THEM. WAIT FOR MY OBJECTIONS, IF YOU
 5 CAN.
 6 BY MR. BUSCH:
 7 Q. DID YOU HAVE ANY CONVERSATION WITH
 8 PHARRELL WILLIAMS DURING OR BEFORE THE CREATION OF
 9 "BLURRED LINES" IN WHICH YOU DISCUSSED WITH HIM
 10 MARVIN GAYE'S SONG "GOT TO GIVE IT UP"?
 11 A. NO.
 12 Q. DO YOU CONSIDER YOURSELF AN HONEST
 13 PERSON?
 14 A. NO. THAT'S WHY I'M SEPARATED.
 15 Q. DO YOU MAKE IT A HABIT OF BEING
 16 DISHONEST WHEN YOU GIVE INTERVIEWS?
 17 A. WHEN I DO -- WHEN I GIVE
 18 INTERVIEWS, I TELL WHATEVER I WANT TO SAY TO HELP
 19 SELL RECORDS.
 20 Q. YOU SAY THE SAME THING WHEN YOU
 21 TESTIFY TO WIN A CASE?
 22 A. NO. ABSOLUTELY NOT.
 23 Q. RIGHT.
 24 A. JESUS.
 25 Q. DO YOU PICK AND CHOOSE WHEN TO TELL

31

1 THE TRUTH? IS THAT WHAT YOU'RE SAYING?
 2 A. I -- I -- I THOUGHT YOU WERE GOING
 3 TO ASK ME QUESTIONS ABOUT THIS CASE.
 4 Q. THIS IS ALL -- THIS IS VERY MUCH
 5 ABOUT THIS CASE.
 6 A. RIGHT.
 7 Q. DO YOU PICK AND CHOOSE WHEN TO TELL
 8 THE TRUTH?
 9 A. ABSOLUTELY NOT. I TOLD MY WIFE THE
 10 TRUTH. THAT'S WHY SHE LEFT ME.
 11 MR. KING: OKAY. JUST -- JUST
 12 ANSWER HIS QUESTIONS --
 13 THE DEPONENT: I'M HAVING FUN. I'M
 14 TRYING --
 15 MR. KING: WELL --
 16 THE DEPONENT: -- TO KEEP IT LIGHT.
 17 MR. KING: OKAY. YOU --
 18 THE DEPONENT: YOU GOTTA -- HE'S
 19 GOTTA BE A DICK TO DO HIS JOB. BUT I CAN STILL --
 20 MR. KING: WE'RE JUST NOT GOING TO
 21 GET OUT OF HERE IF YOU DON'T JUST ANSWER HIS
 22 QUESTIONS. YOU DON'T NEED TO VOLUNTEER --
 23 THE DEPONENT: OKAY.
 24 MR. KING: -- ANYTHING.
 25 THE DEPONENT: ALL RIGHT.

32

1 MR. KING: NO STREAM OF CONSCIENCE.
 2 THE DEPONENT: I DON'T HAVE
 3 ANYTHING TO HIDE.
 4 BY MR. BUSCH:
 5 Q. SIR, PLEASE DO NOT MAKE COMMENTS
 6 LIKE THAT ON THE RECORD. I'M REPRESENTING MY
 7 CLIENTS, NONA AND FRANKIE GAYE, THE CHILDREN OF
 8 MARVIN GAYE, WHO BELIEVE IN THE SONG, WHO
 9 BELIEVE --
 10 (SPEAKING SIMULTANEOUSLY.)
 11 THE DEPONENT: OKAY.
 12 BY MR. BUSCH:
 13 Q. -- THEIR FATHER'S MUSIC --
 14 A. IT'S NOT -- YOU'RE NOT -- LISTEN,
 15 YOU'RE NOT BEING A PLEASANT PERSON.
 16 Q. I'M ASKING --
 17 A. YOU CAN STILL DO YOUR JOB
 18 PLEASANTLY.
 19 Q. I'M ASKING QUESTIONS.
 20 A. THAT'S FINE.
 21 Q. THAT'S ALL I'M DOING.
 22 (SPEAKING SIMULTANEOUSLY.)
 23 BY MR. BUSCH:
 24 Q. YOU MAY NOT LIKE MY QUESTIONS --
 25 A. I LOVE YOUR QUESTIONS.

33

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

CONFIDENTIAL DEPOSITION OF ROBIN THICKE

1 Q OKAY.
 2 A I WANT YOU TO SHOW SOME -- SOME --
 3 SOME RESPECT AND --
 4 Q I'M SHOWING ABSOLUTE RESPECT.
 5 A OKAY. BE KIND. YOU CAN STILL ASK
 6 THE SAME QUESTIONS WITH KINDNESS. THAT'S --
 7 Q DO YOU --
 8 A -- FINE.
 9 Q DO YOU MAKE IT A HABIT OF PICKING
 10 AND CHOOSING WHEN TO TELL THE TRUTH?
 11 A ABSOLUTELY NOT.
 12 Q OKAY.
 13 A THIS IS THE -- THIS IS --
 14 MR. KING: THIS IS --
 15 THE DEPONENT: -- UNDER OATH.
 16 MR. KING: OKAY.
 17 BY MR. BUSCH:
 18 Q I'M GOING TO PLAY THE FIRST TRACK
 19 OF -- THAT I PLAYED FOR YOU A SECOND AGO AND IM
 20 GOING TO STOP IT AFTER A MINUTE OR TWO.
 21 (WHEREUPON, AN AUDIO CLIP PLAYED.)
 22 THE DEPONENT: OH, YOU CAN'T DO
 23 THAT MUSICALLY.
 24 (CONCLUSION OF AUDIO CLIP.)
 25 ///

34

1 WHY DID YOU SAY YOU CANNOT COMBINE THAT IF YOU
 2 COULD NOT HEAR BASS?
 3 A WELL, BECAUSE THE -- THE -- THE
 4 MUSICAL INSTRUMENT, THE WURLITZER OR RHODES,
 5 WHATEVER IS PLAYING THE CHORDS, IS A MINOR CHORD
 6 AND THE VOCALS ARE A MAJOR CHORD, WHICH IS AN
 7 IMPOSSIBILITY IN MUSIC AND WHY THE TWO SONGS
 8 CANNOT BE PLAYED SIMULTANEOUSLY.
 9 Q OKAY. BUT IF I PLAYED THIS FOR YOU
 10 OVER THE LOUD SPEAKER IN THIS ROOM --
 11 A UH-HUH.
 12 Q -- DO YOU THINK YOU COULD BE ABLE
 13 TO TELL ME WHICH BASS LINE YOU HEARD?
 14 A YES, I THINK SO.
 15 Q LET'S DO THAT, THEN.
 16 CAN WE GET THIS TO THE E-MAIL AS AN
 17 ATTACHMENT?
 18 (WHEREUPON, AN AUDIO CLIP PLAYED.)
 19 THE DEPONENT: YEAH, I MEAN, WHEN
 20 YOU PLAY MUSIC LIKE THAT, IT'S LIKE BEING ATTACKED
 21 WITH KNIVES AND SWORDS. YOU CAN'T -- A MUSICIAN
 22 CAN'T HEAR THOSE TWO CLASHES. MINOR OVER MAJOR.
 23 IT'S AN IMPOSSIBILITY.
 24 (CONCLUSION OF AUDIO CLIP.)
 25 THE DEPONENT: OH, ENTERTAINERS.

36

1 BY MR. BUSCH:
 2 Q WHOSE BASS LINE WAS PLAYING IN THE
 3 MUSIC YOU JUST LISTENED TO?
 4 A I COULDN'T TELL.
 5 Q WAS THAT THE BASS LINE FROM "GOT TO
 6 GIVE IT UP" OR WAS IT THE BASS LINE FROM "BLURRED
 7 LINES"?
 8 A I COULD NOT TELL. THE VOCAL AND
 9 THE CHORDS WERE OVERWHELMINGLY INAPPROPRIATE.
 10 Q SO JUST TO BE CLEAR, IN WHAT I JUST
 11 PLAYED FOR YOU, YOU COULD NOT TELL ME WHOSE BASS
 12 LINE WAS PLAYING, WHETHER IT WAS "BLURRED LINES"
 13 OR "GOT TO GIVE IT UP"; CORRECT?
 14 A NO, BECAUSE YOUR MACHINE YOU'RE
 15 USING DOESN'T HAVE ANY BASS IN IT.
 16 Q NONE? NO BASS LINE?
 17 A YOU CAN'T TELL. YOU CAN'T HEAR IT
 18 FROM THAT SPEAKER. IF YOU PUT IT ON A CORRECT
 19 SPEAKER THAT HAS ANY LOW END, I WOULD BE ABLE TO
 20 HEAR THE BASS LINE.
 21 Q SO YOU DIDN'T HEAR ANY BASS LINE?
 22 A YOU CAN'T HEAR IT ON AN IPAD LIKE
 23 THAT. IF YOU GUYS WANT TO GET A BIGGER SPEAKER,
 24 PLAY IT FOR ME APPROPRIATELY.
 25 Q YOU SAID THAT YOU HEARD A CLASH.

35

1 MR. KING: JUST --
 2 THE DEPONENT: I'M HAVING FUN.
 3 MR. KING: WELL, YOUR FUN MIGHT BE
 4 MY PAIN LATER. SO LET'S NOT HAVE TOO MUCH FUN.
 5 THE DEPONENT: I'M A BIG BOY. I'M
 6 A BIG BOY.
 7 MR. KING: OKAY. GOOD.
 8 THE DEPONENT: NO PAIN INVOLVED IN
 9 THIS.
 10 MR. KING: I KNOW. I KNOW.
 11 THE DEPONENT: IT'S ALL DOLLARS AND
 12 CENTS. EVERYONE IN THIS ROOM HAS A HOUSE AND A
 13 FUCKING CAR.
 14 MR. MILLER: THAT'S TRUE.
 15 THE DEPONENT: THERE'S BIGGER
 16 PROBLEMS. PENTHOUSE PROBLEMS.
 17 MR. MILLER: I WISH THEY'D STARTED
 18 AT NOON.
 19 THE DEPONENT: WELL, WHILE YOU GUYS
 20 GET YOUR TECHNOLOGY TOGETHER --
 21 MR. KING: TAKE YOUR --
 22 THE DEPONENT: -- I WILL HAVE A
 23 CIGARETTE BREAK --
 24 MR. KING: TAKE YOUR --
 25 THE DEPONENT: -- IF THAT'S OKAY.

37

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 www.kellinorden.com

CONFIDENTIAL DEPOSITION OF ROBIN THICKE

1 MR. MILLER: EVERY TIME YOU TALK,
 2 YOU MAKE WORK FOR HER.
 3 THE DEPONENT: MAN.
 4 (WHEREUPON, AN AUDIO CLIP PLAYED.)
 5 BY MR. BUSCH:
 6 Q. YOU HEARD THE "HEY, HEY, HEY" WITH
 7 THE MARVIN VOCAL, "I USED TO GO OUT TO PARTIES"?
 8 A. YES, SIR.
 9 Q. OKAY. WHOSE BASS LINE WAS PLAYING
 10 OVER THAT -- OVER THOSE VOCALS?
 11 A. THAT WAS DEFINITELY THE "BLURRED
 12 LINES" BASS LINE.
 13 Q. OKAY.
 14 A. BECAUSE MARVIN GAYE WOULD NEVER
 15 SING OUT OF TUNE.
 16 Q. I'M GOING TO PLAY THE NEXT SECTION
 17 NOW.
 18 MR. KING: THERE'S NO -- THERE'S A
 19 WHITE LIGHT THAT'S GOING TO FLASH --
 20 THE DEPONENT: I KNOW.
 21 MR. KING: OKAY.
 22 THE DEPONENT: OKAY.
 23 BY MR. BUSCH:
 24 Q. PLAYING THE NEXT SECTION NOW,
 25 MR. --

42

1 WERE GOING. I WAS LISTENING TO MARVIN'S VOCAL AND
 2 THE BASS LINE.
 3 Q. OKAY.
 4 A. IF YOU'D LIKE TO PLAY IT FOR ME
 5 AGAIN --
 6 Q. I'LL JUST KEEP ON GOING, I THINK.
 7 A. OKAY.
 8 Q. ALL RIGHT. NEXT SECTION, I'LL PLAY
 9 FOR YOU.
 10 A. OKAY.
 11 (WHEREUPON, AN AUDIO CLIP PLAYED.)
 12 THE DEPONENT: GEEZ.
 13 BY MR. BUSCH:
 14 Q. OKAY. DID YOU HEAR TOWARD THE END
 15 OF WHAT I JUST PLAYED FOR YOU --
 16 A. YES.
 17 Q. -- YOUR VOCALS?
 18 A. I HEARD MY VOCAL. I DID HEAR THE
 19 "HEY, HEY, HEY"'S.
 20 Q. OKAY. AND WHOSE BASS LINE WAS
 21 PLAYING AT THAT POINT?
 22 A. IT CHANGED, I BELIEVE, IN THE
 23 MIDDLE OF WHAT YOU WERE JUST PLAYING. I BELIEVE
 24 THAT IT WENT FROM THE "BLURRED LINES" BASS LINE
 25 INTO THE MARVIN GAYE BASS LINE WHILE --

44

1 A. YES, SIR.
 2 Q. OKAY.
 3 (WHEREUPON, AN AUDIO CLIP PLAYED.)
 4 THE DEPONENT: OH. OH.
 5 (CONCLUSION OF AUDIO CLIP.)
 6 BY MR. BUSCH:
 7 Q. ALL RIGHT. I GOT IT.
 8 YOU HEARD THE VOCAL, "I USED TO GO
 9 OUT TO PARTIES," FOLLOWED BY ANOTHER VOCAL FROM
 10 MARVIN GAYE; CORRECT?
 11 A. YES, SIR.
 12 Q. WHAT WAS THE SECOND VOCAL THAT YOU
 13 HEARD?
 14 A. OOH, "I USED TO GO TO PARTIES AND
 15 STAND AROUND."
 16 Q. OKAY. AND WHOSE BASS LINE WAS
 17 PLAYING AT THAT POINT?
 18 A. SORRY. IT -- JUST NOW, IT WAS
 19 DEFINITELY THE "BLURRED LINES" BASS LINE AGAIN
 20 UNDERNEATH MARVIN GAYE'S VOCAL.
 21 Q. OKAY.
 22 A. BECAUSE HE WAS OUT OF TUNE.
 23 Q. AND THE "HEY, HEY, HEY" WAS GOING
 24 AT THE SAME TIME?
 25 A. I DO NOT RECALL IF THE "HEY, HEY"'S

43

1 Q. OKAY.
 2 A. -- DURING THE MOMENT YOU JUST
 3 PLAYED, BECAUSE IT CHANGED. IT WENT TO MY VOCAL
 4 OVER HIS BASS LINE. IT SWITCHED --
 5 Q. OKAY.
 6 A. -- FROM MY BASS LINE AND HIS VOCAL
 7 TO MY VOCAL AND HIS BASS LINE.
 8 Q. NOW THAT YOU CAN HEAR THE BAS S
 9 LINES --
 10 A. UH-HUH.
 11 Q. -- I'M GOING TO ASK YOU WHAT I
 12 ASKED YOU BEFORE THE BREAK --
 13 A. YES.
 14 Q. -- WHICH IS: DO YOU BELIEVE THAT
 15 THE BASS LINES SOUND SIMILAR?
 16 A. IT IS A MUSICAL IMPOSSIBILITY. NO.
 17 Q. SO SEPARATE AND APART FROM BEING A
 18 MUSICAL IMPOSSIBILITY --
 19 A. YES, SIR.
 20 Q. -- I'M GOING TO ASK YOU WHY IN A
 21 SECOND --
 22 A. OKAY.
 23 Q. -- YOU DON'T BELIEVE THEY SOUND
 24 SIMILAR AT ALL?
 25 A. NOT EVEN CLOSE.

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
 knat@kallinorden.com www.kellinorden.com

CONFIDENTIAL DEPOSITION OF ROBIN THICKE

1 Q. THEY COULD NOT BE CONFUSED FOR ONE
2 ANOTHER?
3 A. NOT AT ALL.
4 Q. OKAY.
5 ALL RIGHT. I'M GOING TO PLAY THE
6 NEXT SECTION.
7 A. OKAY.
8 (WHEREUPON, AN AUDIO CLIP PLAYED.)
9 THE DEPONENT: OH. OH.
10 (CONCLUSION OF AUDIO CLIP.)
11 BY MR. BUSCH:
12 Q. IN THE SECTION I JUST PLAYED FOR
13 YOU, WHICH VOCAL -- WHICH BASS LINE WAS PLAYING?
14 A. MARVIN GAYE'S. OR "GOT TO GIVE IT
15 UP."
16 Q. AND WHAT IS RECOGNIZABLE TO YOU
17 ABOUT MARVIN GAYE'S "GOT TO GIVE IT UP"? HOW DO
18 YOU KNOW THAT IT'S MARVIN GAYE'S "GOT TO GIVE IT
19 UP"?
20 A. HIS VOCAL.
21 Q. I -- I UNDERSTAND YOU UNDERSTAND
22 THAT -- ARE YOU -- WHAT I'M ASKING YOU -- MAYBE
23 I'LL ASK A BETTER QUESTION.
24 A. OKAY.
25 Q. WHAT IDENTIFIES TO YOU MARVIN

46

1 THE DEPONENT: I CAN'T SPEAK FOR
2 THE REST OF THE WORLD.
3 BY MR. BUSCH:
4 Q. OKAY. WELL, YOU DID EARLIER.
5 A. NO, I DIDN'T.
6 Q. OKAY.
7 OKAY. I'M GOING TO PLAY THE NEXT
8 SECTION.
9 A. OKAY.
10 (WHEREUPON, AN AUDIO CLIP PLAYED.)
11 BY MR. BUSCH:
12 Q. IN THAT LAST SECTION, JUST BEFORE
13 THE "I KEEP ON DANCING," WHOSE BASS LINE WAS THAT?
14 A. THAT -- THAT IS AN UNRECOGNIZABLE
15 BASS LINE. BECAUSE OF THE MASH-UP THAT YOU GUYS
16 HAVE CREATED, I COULDN'T TELL YOU WHERE THAT CAME
17 FROM. UNRECOGNIZABLE.
18 Q. SO YOU DON'T KNOW WHETHER THAT
19 WAS --
20 A. I WOULD --
21 Q. -- "BLURRED LINES"?
22 A. I WOULD THINK YOU GUYS MADE THAT
23 UP.
24 Q. OKAY. LET ME JUST FINISH MY
25 QUESTION.

48

1 GAYE'S BASS LINE, AS OPPOSED TO THE "BLURRED
2 LINES" BASS LINE?
3 A. WELL, THEY'RE TWO COMPLETE
4 DIFFERENT SYNCOPATIONS AND -- AND NOTE CHOICES,
5 EXCEPT -- AND DIFFERENT KEYS. ONE'S A MINOR KEY
6 AND ONE'S A MAJOR KEY. SO MUSICALLY, THEY HAVE NO
7 RELEVANCE. THEY CAN'T BE SHARED.
8 WHAT YOU'RE PLAYING IS -- IS --
9 WHEN I SAY "MUSICAL IMPOSSIBILITY," YOU CAN'T PLAY
10 ONE OVER THE OTHER AND -- AND IT EVER MAKE SENSE
11 IN A BAND. THEY WOULD NEVER BE ABLE TO PLAY THE
12 TWO AT THE SAME TIME.
13 Q. AND SO THAT'S THE REASON -- AND IF
14 IT IS THE REASON, YOU JUST TELL ME. BUT IS THAT
15 THE REASON THAT YOU SAY THAT WHEN YOU HEAR THE
16 TWO, THEY DON'T SOUND SIMILAR TO YOU AT ALL?
17 A. YES, BECAUSE MUSICALLY, THERE IS NO
18 SIMILARITY.
19 Q. OKAY. AND YOU DON'T BELIEVE ANYONE
20 COULD LISTEN TO THOSE TWO BASS LINES AND THINK
21 THEY SOUND SIMILAR?
22 MR. KING: OBJECT TO THE FORM;
23 CALLS FOR --
24 THE DEPONENT: I CAN'T --
25 MR. KING: -- SPECULATION.

47

1 A. I'M SORRY. EXCUSE ME.
2 Q. YOU DON'T KNOW IF THAT WAS "BLURRED
3 LINES" BASS LINE, "GOT TO GIVE IT UP" BASS LINE OR
4 A COMBINATION OF THE TWO? YOU CAN'T SAY?
5 A. IT -- IT SOUNDED LIKE A BAND OF
6 4-YEAR-OLDS TRYING TO MAKE A SONG.
7 Q. OKAY.
8 A. SO I CAN'T EVEN REGISTER THAT
9 SECTION.
10 Q. DON'T KNOW WHAT IT WAS?
11 A. HAVE NO IDEA.
12 Q. OKAY. ALL RIGHT.
13 ALL RIGHT. I'M GOING TO PLAY THE
14 NEXT SECTION.
15 A. YES, SIR.
16 (WHEREUPON, AN AUDIO CLIP PLAYED.)
17 THE DEPONENT: OH. OH. OH. OH.
18 (CONCLUSION OF AUDIO CLIP.)
19 BY MR. BUSCH:
20 Q. IN THAT SECTION WITH MARVIN SINGING
21 "KEEP ON DANCING" --
22 A. YES.
23 Q. -- WHICH BASS LINE WAS PLAYING?
24 A. DEFINITELY "BLURRED LINES" BECAUSE
25 EVERY NOTE HE SANG WAS OUT OF TUNE.

49

Kelli Norden and Associates
Court Reporters
310.820.7733 phone 310.820.7933 fax
11857 W. Olympic Boulevard Suite 680E
Los Angeles, California 90064
kna@kellinorden.com www.kellinorden.com

CONFIDENTIAL DEPOSITION OF ROBIN THICKE

1 Q OKAY. GREAT.
 2 OKAY. I'M GOING TO KEEP ON --KEEP
 3 ON GOING.
 4 A YES, SIR.
 5 Q KEEP ON DANCING.
 6 A YOU GOT IT, BABY.
 7 Q ALL RIGHT.
 8 A THANKS FOR BEING COOL, TOO. I'M
 9 SORRY I CALLED YOU A DICK EARLIER. I KNOW YOU'RE
 10 JUST DOING YOUR JOB. I FEEL BAD ABOUT THAT.
 11 Q THAT'S THE NICEST THING ANYONE'S
 12 SAID TO ME ALL DAY.
 13 A IT'S A TOUGH JOB, YOU KNOW.
 14 (WHEREUPON, AN AUDIO CLIP PLAYED.)
 15 THE DEPONENT: OH, THE CHORDS.
 16 OH. MM.
 17 (CONCLUSION OF AUDIO CLIP.)
 18 BY MR. BUSCH:
 19 Q SAME QUESTION --
 20 A YEP.
 21 Q -- WHICH IS: WHICH BASS LINE DID
 22 YOU HEAR IN THAT LAST SECTION?
 23 A THAT LAST SECTION WAS "GOT TO GIVE
 24 IT UP."
 25 Q AND IT WAS OVER WHOSE VOCALS?

50

1 THE FORM, VAGUE AND AMBIGUOUS.
 2 BY MR. BUSCH:
 3 Q GO AHEAD.
 4 A YES, MY -- MY ANSWER WOULD BE
 5 BECAUSE OF THE -- THE -- THE AMOUNT OF DIFFERENT
 6 VOCALS AND MAJOR/MINOR CHORDS THAT YOU HAVE, THAT
 7 BASS LINE IS UNRECOGNIZABLE TO ME, SO I COULDN'T
 8 SAY THAT I'VE HEARD IT IN EITHER SONG.
 9 Q OKAY.
 10 A AND THAT'S THE SAME AS THE OTHER
 11 SECTION YOU PLAYED EARLIER WHEN I SAID IT WAS
 12 UNRECOGNIZABLE.
 13 Q OKAY.
 14 A THAT HAD THE SAME EFFECT.
 15 Q ALL RIGHT. AND THAT'S BOTH YOUR
 16 VOCALS AND MARVIN'S VOCALS --
 17 A EXACTLY.
 18 Q -- PLAYING SIMULTANEOUSLY; CORRECT?
 19 A YES, IT IS. IF I REMEMBER
 20 CORRECTLY, AT THE END, BOTH VOCALS WERE PLAYING.
 21 Q OKAY. ALL RIGHT. JUST GIVE ME ONE
 22 MINUTE, PLEASE.
 23 A NO PROBLEM.
 24 Q YEAH. WE NEED TO TAKE A MINUTE
 25 NOW WE'VE COMPLETED THIS.

52

1 A BOTH VOCALS.
 2 Q OKAY. ALL RIGHT. I'M GOING TO
 3 PLAY THE NEXT SECTION.
 4 A OKAY.
 5 (WHEREUPON, AN AUDIO CLIP PLAYED.)
 6 THE DEPONENT: OH. OH.
 7 (CONCLUSION OF AUDIO CLIP.)
 8 BY MR. BUSCH:
 9 Q OKAY. SAME QUESTION WITH RESPECT
 10 TO THAT LAST SECTION YOU JUST HEARD: WHICH BASS
 11 LINE DID YOU HEAR?
 12 A THAT IS A FALSIFIED, MADE-UP BASS
 13 LINE BY YOU AND YOUR PEOPLE. THERE IS NO
 14 EIGHT-BAR STANZA THAT HAS THAT BASS LINE THAT
 15 REPETITIVE. YOU -- YOUR PEOPLE MUST HAVE CREATED
 16 THAT. THAT DOESN'T EXIST IN EITHER SONG.
 17 Q THAT DOESN'T EXIST IN EITHER SONG?
 18 A AS FAR AS I KNOW --
 19 Q AND --
 20 A -- THOSE LAST EIGHT BARS OF BASS
 21 LINE HAVE BEEN CREATED BY SOMEONE ON YOUR TEAM.
 22 Q OKAY. AND SO IT IS NOT IN ANY WAY
 23 WHAT CAN BE HEARD IN EITHER "GOT TO GIVE IT UP" OR
 24 "BLURRED LINES"?
 25 MR. KING: OBJECTION. OBJECT TO

51

1 A YES.
 2 Q TAKE A FIVE-MINUTE BREAK, PLEASE.
 3 A OKAY. GREAT.
 4 THE VIDEOGRAPHER: GOING OFF THE
 5 VIDEOTAPE RECORD AT 12:14 P.M. THAT WILL CONCLUDE
 6 DISK ONE OF VOLUME NUMBER I.
 7 AND THAT'S OFF.
 8 (WHEREUPON, A RECESS WAS HELD
 9 FROM 12:14 P.M. TO 12:26 P.M.)
 10 (WHEREUPON, THE PROCEEDINGS CONTINUED
 11 WITHOUT THE PRESENCE OF MR. ROBERTS.)
 12 THE VIDEOGRAPHER: AND WE'RE BACK
 13 ON THE VIDEOTAPE RECORD, BEGINNING DISK NUMBER TWO
 14 OF VOLUME NUMBER I AT 12:26 P.M.
 15 BY MR. BUSCH:
 16 Q MR. THICKE, WE KIND OF JUMPED AHEAD
 17 A LITTLE BIT BY PLAYING THIS MUSIC RIGHT AT THE
 18 BEGINNING.
 19 A UH-HUH.
 20 Q I WANT TO GO BACK NOW AND KIND OF
 21 GET SOME BACKGROUND ABOUT YOU, IF I COULD.
 22 A YES, SIR.
 23 Q WHAT YEAR DID YOU GRADUATE HIGH
 24 SCHOOL?
 25 A I GREW UP -- OOH, '95, '95.

53

Kelli Norden and Associates
 Court Reporters
 310.320.7733 phone 310.320.7933 fax
 11835 W. Olympic Boulevard Suite 680E
 Los Angeles, California 90064
 kna@kellinorden.com www.kellinorden.com

CONFIDENTIAL DEPOSITION OF ROBIN THICKE

1 I CAN ONLY DECIPHER THAT IF I HAD A
 2 KEYBOARD; I COULD TELL YOU WHICH NOTE MADE THE
 3 DIFFERENCE.
 4 Q. SO YOU WOULD NOT BE ABLE TO --
 5 TO -- SITTING HERE TODAY, LOOKING AT THIS, YOU
 6 WOULD NOT BE ABLE TO EITHER CONFIRM OR DENY THAT
 7 IS THE -- THE C SHARP THAT IS THE THIRD THAT WOULD
 8 BE, IN YOUR VIEW, THE MOST CRUCIAL?
 9 A. NO. IN FACT, I WOULD ABSOLUTELY
 10 NOT STATE THAT BECAUSE UNLESS I HAVE A KEYBOARD
 11 AND I COULD PLAY THE CHORD MYSELF BY EAR, I
 12 WOULDN'T BE ABLE TO TELL YOU WHAT WAS THE NOTE
 13 THAT MADE THE DIFFERENCE BETWEEN THE MAJOR AND
 14 MINOR.
 15 Q. OKAY.
 16 A. BUT I CAN DO IT BY EAR.
 17 Q. DO YOU MEAN THAT MARVIN GAYE'S "GOT
 18 TO GIVE IT UP" IS IN A MINOR KEY OR JUST THE
 19 KEY -- OR JUST THAT THE KEYBOARD CHORD IS IN A
 20 MINOR KEY?
 21 A. THEY -- THEY -- ONE CAN'T EXIST
 22 WITHOUT THE OTHER.
 23 Q. MEANING THEY'RE BOTH IN THE MINOR
 24 KEY?
 25 A. YES. "DOO, DOO, DOO, DOO." THE

66

1 BASS LINE IS MINOR. "DOO, DOO, DOO, DOO, DOO,
 2 DOO."
 3 Q. ALL RIGHT.
 4 ALL RIGHT. I WANT TO NOW GIVE YOU
 5 A COUPLE OF THINGS TO AUTHENTICATE FOR ME.
 6 A. OKAY.
 7 MR. BUSCH: LET'S MARK AS THE NEXT
 8 EXHIBIT MR. THICKE'S RESPONSES TO INTERROGATORIES.
 9 DEPOSITION OFFICER: EXHIBIT 32.
 10 (WHEREUPON, DEFENDANTS' EXHIBIT NUMBER
 11 32 WAS MARKED FOR IDENTIFICATION BY
 12 THE DEPOSITION OFFICER AND IS ATTACHED
 13 HERETO.)
 14 DEPOSITION OFFICER: THERE YOU GO.
 15 THE DEPONENT: THANK YOU, LOVE.
 16 WHICH PAGE WOULD YOU LIKE ME TO GO
 17 TO?
 18 BY MR. BUSCH:
 19 Q. FIRST OF ALL, I WANT TO ASK YOU:
 20 HAVE YOU EVER SEEN THIS DOCUMENT BEFORE IN YOUR
 21 LIFE?
 22 A. I BELIEVE THIS IS THE DOCUMENT THAT
 23 I SIGNED THAT HAS OUR -- OUR -- OUR STATEMENT, OUR
 24 RECORDED STATEMENT.
 25 IS THAT CORRECT?

67

1 Q. LET ME --
 2 MR. KING: YOU --
 3 BY MR. BUSCH:
 4 Q. WHAT I DID WAS --
 5 A. OKAY. I'M SORRY.
 6 Q. -- I SERVED WRITTEN QUESTIONS.
 7 A. OKAY.
 8 Q. I -- IN A LAWSUIT LIKE THIS, IN
 9 ADDITION TO DOING A DEPOSITION WHERE I QUESTION
 10 YOU --
 11 A. RIGHT.
 12 Q. -- WE'RE ALSO ENTITLED TO SERVE
 13 WRITTEN QUESTIONS --
 14 A. GOT IT.
 15 Q. -- THAT YOU ARE TO ANSWER.
 16 A. GOT IT.
 17 Q. SO I'M -- IF YOU TURN TO --
 18 A. THIS DOES LOOK LIKE THE PIECE OF
 19 PAPER THAT I SIGNED THAT HAD MY ANSWERS IN THEM.
 20 Q. OKAY. SO YOU DID READ AND CONFIRM
 21 THE ANSWERS THAT ARE IN THIS AS BEING TRUE AND
 22 ACCURATE, TO THE BEST OF YOUR KNOWLEDGE?
 23 A. YES, IF THIS IS -- I HAVEN'T SEEN
 24 ANYTHING WITH MY NAME IN IT YET OR SAYS -- OR HAVE
 25 ANY OF MY QUOTES IN IT. BUT IF THIS IS THAT PIECE

68

1 OF PAPER, THEN YES, I DID APPROVE IT.
 2 MR. KING: THIS IS NOT, SO --
 3 THE DEPONENT: IT'S NOT?
 4 MR. KING: NO.
 5 WHY DON'T YOU GIVE HIM THE ONE HE
 6 SIGNED, RICHARD. REALLY.
 7 THE DEPONENT: YEAH, BE CAUSE IT
 8 DOESN'T LOOK EXACTLY THE SAME.
 9 MR. KING: WE'LL STIPULATE THAT HE
 10 SIGNED AND VERIFIED RESPONSES TO INTERROGATORIES,
 11 IF THAT'S WHAT YOU WANT.
 12 MR. BUSCH: YES, I DO.
 13 MR. KING: WELL, WE'LL STIPULATE TO
 14 THAT.
 15 MR. BUSCH: OKAY.
 16 MR. KING: JUST DOESN'T HAPPEN TO
 17 BE EXHIBIT 32. PROBABLY EXHIBIT 33. IF YOU FLASH
 18 ME THE VERIFICATION, I'LL STIPULATE THAT THAT'S
 19 WHAT HE SIGNED AND SERVED.
 20 MR. BUSCH: I GOT IT. OKAY.
 21 WASN'T MEANT TO BE A TRICK. I JUST PULLED OUT THE
 22 WRONG ONE.
 23 ALL RIGHT. SO LET'S MARK AS THE
 24 NEXT EXHIBIT HIS SUPPLEMENTAL -- HIS ANSWERS TO
 25 INTERROGATORIES AND SUPPLEMENTAL ANSWERS TO

69

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 www.kellinorden.com

CONFIDENTIAL DEPOSITION OF ROBIN THICKE

1 INTERROGATORIES.
2 (WHEREUPON, DEFENDANTS' EXHIBIT NUMBER
3 33 WAS MARKED FOR IDENTIFICATION BY
4 THE DEPOSITION OFFICER AND IS ATTACHED
5 HERETO.)
6 DEPOSITION OFFICER: IT'S 33.
7 BY MR. BUSCH:
8 Q. AND SO YOU DON'T HAVE TO LOOK
9 THROUGH THE WHOLE THING, MR. THICKE.
10 A. YES.
11 Q. WHEN YOU GET HANDED THAT DOCUMENT
12 BY THE COURT REPORTER --
13 A. YES.
14 Q. -- TURN TO THE FOURTH-FROM-THE-LAST
15 PAGE. I BELIEVE YOU'LL SEE A VERIFICATION THAT
16 HAS YOUR SIGNATURE ON IT.
17 A. GOT IT.
18 (DOCUMENT HANDED TO THE DEPONENT.)
19 THE DEPONENT: AND THANK YOU.
20 YES, THAT IS DEFINITELY MY
21 SIGNATURE, EXECUTED AT THE GREENWICH HOTEL IN
22 NEW YORK CITY, YES.
23 BY MR. BUSCH:
24 Q. OKAY. AND YOU SIGNED AND CERTIFIED
25 THAT YOU DECLARED UNDER PENALTY OF PERJURY ON THAT

70

1 PAGE WHERE YOU SIGNED IT THAT THE DOCUMENT -- THAT
2 THE ANSWERS ARE TRUE BASED O N YOUR KNOWLEDGE;
3 CORRECT?
4 A. YES.
5 Q. OKAY. AND YOU WENT OVER EVERYTHING
6 BEFORE IT WAS SENT?
7 A. YES.
8 Q. OKAY.
9 ALL RIGHT. MR. THICKE, PUT THAT
10 DOCUMENT AWAY.
11 A. OKAY.
12 Q. YOU HAVE GIVEN SEVERAL INTERVIEWS,
13 MANY INTERVIEWS, AND WE'VE PULLED THEM, ABOUT THE
14 CREATION OF "BLURRED LINES."
15 A. YES.
16 Q. AND I ALLUDED TO SOME OF THAT AT
17 THE BEGINNING OF THIS DEPOSITION BEFORE THE BREAK.
18 DO YOU RECALL THAT?
19 A. YES.
20 Q. OKAY. I WANT TO SHOW YOU SOME OF
21 THOSE AND WE'LL GO OVER THEM.
22 LET ME ASK, BEFORE I -- BEFORE WE
23 GET INTO THAT, LET ME JUST ASK YOU SOME MORE ABOUT
24 MARVIN GAYE.
25 A. OKAY.

71

1 Q. WHEN DID YOU FIRST HEAR MARVIN
2 GAYE'S MUSIC?
3 A. PROBABLY WHEN I WAS 8 YEARS OLD, 9
4 YEARS OLD.
5 Q. OKAY. AND WHICH MARVIN GAYE SONGS
6 AND ALBUMS DO YOU OWN OR HAVE YOU EVER OWNED?
7 A. I -- I OWNED THE GREATEST -- IT'S
8 HARD NOW WITH ITUNES BECAUSE YOU DON'T REALLY
9 REMEMBER ALBUM TITLES AND STUFF LIKE THAT.
10 Q. UH-HUH.
11 A. I HAVE A GREATEST HITS. I HAVE
12 "WHAT'S GOING ON" FOR SURE. AND I HAVE -- AND I
13 HAVE "HERE, MY DEAR."
14 Q. OKAY. AND YOU'VE STATED PUBLICLY
15 THAT "GOT TO GIVE IT UP" IS ONE OF YOUR FAVORITE
16 SONGS OF ALL TIME. IS THAT TRUE?
17 A. ONE OF MY HUNDRED --
18 (SPEAKING SIMULTANEOUSLY.)
19 MR. KING: WAIT. WAIT.
20 THE DEPONENT: ONE OF --
21 MR. KING: -- OBJECT TO THE FORM.
22 MR. BUSCH: SURE.
23 MR. KING: ARE YOU ASKING HIM IF --
24 YOUR -- YOUR QUESTION IS COMPOUND.
25 ///

72

1 BY MR. BUSCH:
2 Q. I'M ASKING YOU: IS IT TRUE THAT
3 "GOT TO GIVE IT UP" IS ONE OF YOUR FAVORITE SONGS
4 OF ALL TIME?
5 MR. KING: OKAY. BECAUSE YOU ASKED
6 HIM A DIFFERENT QUESTION BEFORE.
7 THE DEPONENT: OKAY. I WOULD SAY
8 AFTER THE -- MY OWN HUNDRED SONGS, YES, IT'S ONE
9 OF MY FAVORITE SONGS.
10 BY MR. BUSCH:
11 Q. OKAY.
12 A. COMES RIGHT AFTER MY SONGS.
13 Q. ARE YOU -- ARE YOU -- ARE YOU
14 FAMILIAR WITH "ALL MUSIC GUIDES" STATEMENT THAT
15 YOU HAVE A, QUOTE, "PERPETUAL MARVIN FIXATION,"
16 END QUOTE?
17 A. NO, NO, I HAVE NEVER HEARD THAT.
18 Q. YOU'VE NEVER HEARD THAT BEFORE?
19 A. NO.
20 Q. OKAY. DO YOU RECALL EVER STATING
21 THAT MARVIN GAYE WAS YOUR IDOL?
22 A. I HAVE -- I DO RECALL STATING THAT
23 MARVIN AS -- IS ONE OF MANY OF MY IDOLS.
24 Q. OKAY.
25 A. AND NO MORE THAN ANY OF MY OTHERS.

73

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 www.kellinorden.com

CONFIDENTIAL DEPOSITION OF ROBIN THICKE

1 Q. HAVE YOU EVER STATED THAT MARVIN
 2 GAYE INSPIRES HALF OF YOUR MUSIC?
 3 A. OH, I WOULDN'T RECALL SAYING THAT,
 4 BUT --
 5 Q. DO YOU RECALL BEING --
 6 A. -- AND THAT WOULDN'T BE TRUE.
 7 Q. IT WOULD NOT BE TRUE?
 8 A. NOT -- IF I SAID THAT, IT'S NOT
 9 TRUE, NO.
 10 Q. OKAY. WHY WOULD YOU SAY IT IF IT'S
 11 NOT TRUE?
 12 A. IT DEPENDS ON WHAT THE LEAD-IN 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.
 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

74

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 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 --

75

1 A. YES.
 2 Q. -- REVIEWING WHAT I'VE MARKED AS
 3 EXHIBIT --
 4 WHAT IS IT?
 5 DEPOSITION OFFICER: 34.
 6 BY MR. BUSCH:
 7 Q. -- 34, THIS IS AN INTERVIEW WITH
 8 YOUR FACE -- PICTURE ON IT; CORRECT?
 9 A. YES, SIR.
 10 Q. FOR "G.Q. MAGAZINE."
 11 I WANT TO TURN YOUR ATTENTION TO
 12 PAGE 2 --
 13 A. OKAY.
 14 Q. -- OF THIS, IF I COULD. AND THE
 15 QUESTION IS ASKED OF YOU:
 16 "WHAT'S THE ORIGIN STORY
 17 BEHIND YOUR NEW SINGLE 'BLURRED
 18 LINES'?"
 19 DO YOU SEE THAT QUESTION?
 20 A. YES, SIR.
 21 Q. OKAY. AND YOU SAY, QUOTE:
 22 "PHARRELL AND I WERE IN
 23 THE STUDIO AND I TOLD HIM THAT
 24 ONE OF MY FAVORITE SONGS OF ALL
 25 TIMES WAS MARVIN GAYE'S 'GOT TO

76

1 GIVE IT UP.' I WAS LIKE, 'DAMN,
 2 WE SHOULD MAKE SOMETHING LIKE
 3 THAT, SOMETHING WITH THAT
 4 GROOVE.' THEN HE STARTED
 5 PLAYING A LITTLE SOMETHING. WE
 6 LITERALLY WROTE THE SONG IN
 7 ABOUT A HALF HOUR AND RECORDED
 8 IT."
 9 DO YOU SEE THAT?
 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 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

77

Kelli Norden and Associates
 Court Reporters
 310.820.7733 phone 310.820.7933 fax
 1833 W. Olympic Boulevard Suite 680E
 Los Angeles, California 90064
 kna@kellinorden.com www.kellinorden.com

CONFIDENTIAL DEPOSITION OF ROBIN THICKE

1 SONG "GOT TO GIVE IT UP"?

2 A. NO.

3 Q. IT IS CORRECT? WHAT I JUST SAID IS

4 CORRECT?

5 A. YES, WHAT YOU SAID IS CORRECT, THAT

6 HIM AND I DID NOT DISCUSS IT. I TRIED TO TAKE

7 CREDIT FOR IT LATER BECAUSE HE WROTE THE WHOLE

8 THING PRETTY MUCH BY HIMSELF AND I WAS ENVOUS OF

9 THAT.

10 Q. OKAY.

11 MR. KING: AND WHEN YOU'RE DONE

12 WITH THIS EXHIBIT, HIS FOOD IS HERE, SO ...

13 THE DEPONENT: IS IT -- IS IT

14 ALLOWED TO BE BROUGHT IN?

15 MR. KING: NO.

16 THE DEPONENT: NO. OKAY.

17 MR. KING: NO.

18 THE DEPONENT: THANK YOU. NO

19 PROBLEM. WE'LL WAIT. WE'LL WAIT UNTIL HE'S

20 FINISHED.

21 BY MR. BUSCH:

22 Q. WHAT STUDIO WAS "BLURRED LINES"

23 RECORDED AT?

24 A. I DO NOT RECALL THE NAME OF IT.

25 MAYBE GLENWOOD. IS THAT -- COULD THAT BE CORRECT?

1 GLENWOOD STUDIOS?

2 Q. OKAY. WERE YOU PRESENT DURING THE

3 CREATION OF "BLURRED LINES"?

4 A. I WAS PRESENT. OBVIOUSLY, I SANG

5 IT. I HAD TO BE THERE.

6 Q. WHEN THE -- WHEN THE RYTHYM TRACK

7 WAS BEING CREATED, WERE YOU THERE WITH PHARRELL?

8 A. TO BE HONEST, THAT'S THE ONLY

9 PART WHERE -- I WAS HIGH ON VICODIN AND ALCOHOL

10 WHEN I SHOWED UP AT THE STUDIO.

11 SO MY RECOLLECTION IS WHEN WE MADE

12 THE SONG, I THOUGHT I WANTED -- I -- I WANTED TO

13 BE MORE INVOLVED THAN I ACTUALLY WAS BY THE TIME,

14 NINE MONTHS LATER, IT BECAME A HUGE HIT AND I

15 WANTED CREDIT.

16 SO I STARTED KIND OF CONVINCING

17 MYSELF THAT I WAS A LITTLE MORE PART OF IT THAN I

18 WAS AND I -- BECAUSE I DIDN'T WANT HIM -- I WANTED

19 SOME CREDIT FOR THIS BIG HIT.

20 BUT THE REALITY IS, IS THAT

21 PHARRELL HAD THE BEAT AND HE WROTE ALMOST EVERY

22 SINGLE PART OF THE SONG.

23 Q. SO -- BUT MY QUESTION IS: WERE YOU

24 PRESENT WHEN THE ORIGINAL RYTHYM TRACK -- WHEN THE

25 MUSIC WAS BEING LAID DOWN?

1 A. I WALKED IN UPON IT.

2 Q. UPON IT BEING STARTED?

3 A. YES. IN ITS -- IN ITS SKELETAL

4 FORM, I WALKED IN AND HE STARTED SINGING ME SOME

5 IDEAS HE HAD AND THE SONG HAPPENED VERY QUICKLY.

6 I -- I JUMPED RIGHT INTO THE BOOTH AND STARTED

7 SINGING WHATEVER HE SAID.

8 Q. OKAY. AND SO THERE WAS ACTUALLY NO

9 DISCUSSION OF MARVIN GAYE AT ALL?

10 A. NO.

11 Q. OKAY. IN FACT, YOU DIDN'T OFFER

12 HIM ANY IDEAS OR THOUGHTS OR ANYTHING THAT YOU HAD

13 WITH RESPECT TO "BLURRED LINES"?

14 A. NO.

15 Q. OKAY. "NO," MEANING WHAT I SAID IS

16 CORRECT?

17 A. YES, WHAT YOU SAID IS CORRECT. I

18 OFFERED NO IDEAS TO CONNECT TO ANYTHING TO MARVIN

19 GAYE.

20 Q. YOU DIDN'T OFFER ANY IDEAS AT ALL;

21 RIGHT?

22 A. NO, NOT REALLY.

23 Q. OKAY.

24 A. I WISH I COULD TAKE THE CREDIT FOR

25 IT. BUT MY NEW ALBUM'S GREAT. WAIT TILL YOU HEAR

1 THAT ONE.

2 MR. KING: RICHARD, WOULD THIS BE A

3 GOOD TIME FOR HIM TO EAT HIS LUNCH?

4 MR. BUSCH: NO, LET -- LET ME GET

5 THROUGH A COUPLE THINGS HERE.

6 THE DEPONENT: OKAY, BUDDY.

7 MR. BUSCH: THEN WE CAN.

8 MR. KING: I CAN HEAR YOUR LAWYER

9 WORKING IN THE NEXT ROOM.

10 THE DEPONENT: YEAH.

11 THE VIDEOGRAPHER: MICROPHONE, SIR.

12 BY MR. BUSCH:

13 Q. DID -- WAS MILEY CYRUS RECORDING

14 ACROSS THE HALL WHEN YOU WERE RECORDING "BLURRED

15 LINES" AND DID YOU HAVE HER WALK ACROSS TO HAVE

16 HER COME IN AND LISTEN TO WHAT YOU GUYS WERE

17 DOING?

18 A. I BELIEVE SHE -- WHEN THE SONG WAS

19 COMPLETELY FINISHED, SHE -- WE PLAYED IT FOR HER,

20 YEAH.

21 Q. OKAY.

22 A. SHE WAS PLAYING SOME OF HER MUSIC

23 AND I PLAYED -- WE PLAYED "BLURRED LINES."

24 Q. OKAY.

25 MR. KING: HOW ABOUT NOW, RICHARD?

Kelli Norden and Associates
 Court Reporters
 310.820.7733 phone 310.820.7933 fax
 1835 W. Olympic Boulevard Suite 600E
 Los Angeles, California 90064
 kna@kellinorden.com www.kellinorden.com

CONFIDENTIAL DEPOSITION OF ROBIN THICKE

1 CAN HE EAT HIS LUNCH?
 2 MR. BUSCH: I MEAN --
 3 THE DEPONENT: IT'S OKAY.
 4 MR. BUSCH: DO YOU WANT TO --
 5 THE DEPONENT: I TAKE ABOUT THREE
 6 MINUTES TO EAT A MEAL. IT MIGHT BE THE AMOUNT OF
 7 TIME YOU NEED RIGHT THERE.
 8 MR. BUSCH: ALL RIGHT. IT'S FINE.
 9 LET'S TAKE A BREAK.
 10 THE DEPONENT: IS THAT OKAY?
 11 YEAH. I MEAN, I DON'T WANT -- I DON'T WANT
 12 EVERYONE TO LEAVE AND THEN -- I CAN DO -- I CAN DO
 13 THREE --
 14 MR. KING: WELL, YOU CAN DO LONGER
 15 THAN THREE --
 16 THE DEPONENT: SMACK DOWN.
 17 MR. BUSCH: LET ME ASK ONE LAST
 18 QUESTION BEFORE YOU GO.
 19 THE DEPONENT: YES, PLEASE.
 20 BY MR. BUSCH:
 21 Q. SO JUST TO BE 100 PERCENT CLEAR --
 22 A. YES.
 23 Q. -- YOU WERE PRESENT WHEN THE TRACKS
 24 WERE BEING LAID DOWN, BUT YOU OFFERED NO
 25 SUGGESTION, THOUGHTS OR INPUT ABOUT WHAT TO DO OR

1 LOS ANGELES, CALIFORNIA, WEDNESDAY
 2 APRIL 23, 2014
 3 1:55 P.M.
 4
 5 THE VIDEOGRAPHER: AND WE'RE BACK
 6 ON THE VIDEOTAPE RECORD AT 1:55 P.M.
 7
 8 EXAMINATION (RESUMED)
 9 BY MR. BUSCH:
 10 Q. OKAY. MR. THICKE, DURING OUR LUNCH
 11 BREAK, DID YOU CONSULT WITH YOUR ATTORNEY ABOUT
 12 ANY OF YOUR TESTIMONY?
 13 A. NO, SIR.
 14 Q. OKAY. ALL RIGHT. I WANT TO ASK
 15 YOU: YOU RECEIVE WRITER CREDIT ON "BLURRED
 16 LINES"; CORRECT?
 17 A. YES.
 18 Q. AND YOU OWN PART OF THE PUBLISHING
 19 ON "BLURRED LINES"; CORRECT?
 20 A. YES.
 21 Q. WHAT PERCENTAGE -- WHAT WRITER
 22 CREDIT DID YOU GET?
 23 A. I BELIEVE IN THE END, THAT ONCE
 24 T.I. JOINED -- I'M SORRY. ACTUALLY, I DON'T KNOW
 25 IF -- I THINK IT'S 22 PERCENT. MIGHT BE 18

1 WHAT STYLE TO EVOKE OR ANYTHING?
 2 A. ABSOLUTELY NOT.
 3 Q. OKAY. ALL RIGHT. THANK YOU VERY
 4 MUCH.
 5 A. THANK YOU.
 6 THE VIDEOGRAPHER: GO OFF THE
 7 VIDEOTAPE RECORD AT 12:55 P.M.
 8 AND THAT'S OFF.
 9 (WHEREUPON, A LUNCHEON RECESS WAS
 10 HELD FROM 12:55 P.M. TO 1:55 P.M.)
 11 ///
 12 ///
 13 ///
 14
 15
 16
 17
 18
 19
 20
 21
 22
 23
 24
 25

1 PERCENT. SOMETHING LIKE THAT.
 2 Q. AND WHAT PERCENT -- THAT'S
 3 PUBLISHING THAT YOU HAVE AS WELL?
 4 A. YES, IT SHOULD BE THE SAME. THE
 5 WRITING CREDIT AND THE PUBLISHING SHOULD BE THE
 6 SAME.
 7 Q. OKAY. ALL RIGHT. SO I GUESS MY
 8 QUESTION IS: YOU SAID EARLIER IN THIS DEPOSITION
 9 THAT ONE OF THE REASONS THAT YOU SAID WHAT YOU
 10 SAID IN THE INTERVIEWS ABOUT YOUR INVOLVEMENT IN
 11 THE CREATION OF "BLURRED LINES" WAS BECAUSE YOU
 12 WERE JEALOUS, IT WAS A BIG HIT AND YOU WANTED --
 13 A. YES.
 14 Q. -- PEOPLE TO BELIEVE THAT YOU WERE
 15 INVOLVED --
 16 A. NOT UPSET. JEAL- -- I'M SO SORRY
 17 TO INTERRUPT YOU. I APOLOGIZE.
 18 Q. OKAY. BUT YOU USED THE WORD
 19 "JEALOUS"?
 20 A. YES.
 21 Q. OKAY. I GUESS MY QUESTION TO YOU
 22 IS: WHY WOULD YOU NEED TO BE JEALOUS IF YOU HAD
 23 RECEIVED WRITERS CREDIT AND PUBLISHING CREDIT?
 24 A. BECAUSE I ALWAYS PRIDED I -- MYSELF
 25 ON THE FACT THAT I WROTE AND PRODUCED MY FIRST SIX

Kelli Norden and Associates
 Court Reporters
 310.820.7755 phone 310.820.7955 fax
 11855 W. Olympic Boulevard Suite 680E
 Los Angeles, California 90064
 kna@kellinorden.com www.kellinorden.com

CONFIDENTIAL DEPOSITION OF ROBIN THICKE

1 ALBUMS MYSELF, AND THE FACT THAT I WAS UNABLE TO
 2 WRITE AND PRODUCE BY MYSELF A RECORD THAT BIG AND
 3 THAT SUCCESSFUL.
 4 ONCE -- ONCE IT BECAME SUCCESSFUL,
 5 I FELT LIKE I WANTED TO HAVE SOME OF THE CREDIT
 6 FOR THE OTHER SIX ALBUMS' WORTH OF WORK THAT I HAD
 7 DONE, BECAUSE PHARRELL, BEING SUCH A WELL-KNOWN
 8 PRODUCER AND WRITER, EVERYBODY, AS THEY ENDED UP
 9 DOING, GAVE PHARRELL MOST OF THAT CREDIT.
 10 I GOT CREDIT FOR BEING THE STAR OF
 11 THE SONG, BUT PHARRELL, DESERVEDLY SO, GOT THE
 12 CREDIT FOR WRITING AND PRODUCING THE SONG -- THE
 13 RECORD.
 14 AND THE RECORD WOULD HAVE HAPPENED
 15 WITH OR WITHOUT ME. I JUST WAS LUCKY ENOUGH TO BE
 16 THERE WHEN HE WROTE IT AND I WAS IN THE ROOM.
 17 AND BECAUSE HIM AND I HAVE WRITTEN
 18 TOGETHER BEFORE AND HE RESPECTS ME AS A WRITER,
 19 AND HE KNOWS THAT I WRITE AND PRODUCE MY OWN
 20 MUSIC -- LIKE THAT LAST SONG, THAT'S ME BY MYSELF,
 21 WRITING AT THE PIANO -- HE KNOWS I CAN DO THAT ON
 22 MY OWN.
 23 SO HE WAS VERY GENEROUS BY GIVING
 24 ME A LARGER PERCENTAGE OF PUBLISHING THAN I
 25 DESERVED.

86

1 MY IDEA WOULD MAKE IT MORE PERSONAL BECAUSE MY
 2 MUSIC HAS ALWAYS BEEN SO PERSONAL, THAT THIS WAS
 3 THE FIRST TIME I HAD A SONG OUT THAT WASN'T
 4 PERSONAL AND HAD NOTHING TO DO WITH ME, AND YET IT
 5 WAS MY BIGGEST SUCCESSFUL, WHICH, YOU KNOW, WAS
 6 VERY TOUGH FOR ME.
 7 AND SO I LIED IN MY STORY SO I
 8 COULD AT LEAST MAKE IT SEEM LIKE, HEY, I'M THE GUY
 9 WHO CAME UP WITH THIS GREAT IDEA. AND YOU KNOW
 10 WHAT? I DIDN'T EVEN USE THE MARVIN GAYE THING
 11 UNTIL EVERYONE STARTED SAYING TO ME, "HEY, IT'S
 12 REMINISCENT OF THE MARVIN GAYE SONG."
 13 AND I WAS LIKE, "WELL, YEAH, THAT
 14 WAS MY IDEA. I WANTED TO DO SOMETHING LIKE THAT."
 15 THERE WAS NO OTHER WAY FOR ME TO GET CREDIT FOR
 16 THIS BIGGEST SONG OF THE YEAR UNLESS IT WAS MY
 17 IDEA.
 18 Q. WHICH NONE OF IT WAS?
 19 A. WHICH NONE OF IT WAS MY IDEA.
 20 Q. ALL RIGHT. IN YOUR INTERVIEW
 21 WITH -- ON THE "OPRAH SHOW" --
 22 A. YES.
 23 Q. -- YOU SAID:
 24 "YOU CAN'T OWN A FEELING.
 25 YOU OWN THE MELODIES, THE BASS

88

1 Q. YEAH. I -- I STILL -- I DON'T --
 2 MY POINT --
 3 A. OKAY.
 4 Q. -- MY QUESTION TO YOU IS THIS:
 5 WHY, SINCE YOU HAD RECEIVED WRITERS CREDIT --
 6 A. YES.
 7 Q. -- SINCE YOU HAD RECEIVED 20
 8 PERCENT -- APPROXIMATELY 20 PERCENT WRITERS --
 9 A. BECAUSE THE PUBLIC --
 10 Q. HOLD ON.
 11 A. -- DOESN'T KNOW THOSE THINGS.
 12 Q. LET ME --
 13 A. THE PUBLIC WOULD ONLY KNOW IT IF I
 14 SOMEHOW SAID IT WAS MY IDEA. SO THE ONLY WAY TO
 15 MAKE THE SONG MY IDEA WAS TO SAY, "HEY, I WANTED
 16 TO DO SOMETHING LIKE THIS AND PHARRELL MADE IT."
 17 BUT THE TRUTH WAS PHARRELL MADE IT
 18 WITHOUT ME AND HE WAS -- HE WOULD HAVE MADE IT
 19 WITHOUT ME AND I WAS LUCKY TO BE IN THE ROOM.
 20 Q. OKAY. SO THAT'S WHY YOU CAME UP
 21 WITH THE ELABORATE -- THE ELABORATE STORY THAT
 22 YOU --
 23 A. YES, BECAUSE I THOUGHT IT WOULD
 24 HELP SELL RECORDS.
 25 I THOUGHT THAT IT BEING MY SONG --

87

1 LINE, THE CHORD PROGRESSIONS,
 2 THE SYNCOPATION."
 3 OKAY?
 4 A. UH-HUH.
 5 Q. MY QUESTION TO YOU IS: DO YOU
 6 BELIEVE THERE IS ANY SIMILARITY IN ANY OF THE
 7 MELODIES BETWEEN "BLURRED LINES" AND "GOT TO GIVE
 8 IT UP"?
 9 A. NOT A SINGLE MELODY NOTE IS THE
 10 SAME. ABSOLUTELY NOT.
 11 Q. AND NOTHING SIMILAR, AS WE'VE
 12 TALKED ABOUT EARLIER, IN YOUR VIEW, ABOUT THE BASS
 13 LINES?
 14 A. THE BASS LINES ARE COMPLETELY
 15 DIFFERENT.
 16 Q. OKAY.
 17 A. THE RYTHYMS AND THE NOTES.
 18 Q. AND HOW DO YOU KNOW THE NOTES ARE
 19 DIFFERENT IF YOU CAN'T READ MUSIC?
 20 A. BECAUSE I TRAINED MYSELF AND I --
 21 AND I WRITE AND PRODUCE MUSIC EVERY DAY. SO I CAN
 22 SING BASS LINES AND I CAN -- I CAN HAVE -- AND I
 23 SING GUITAR LINES.
 24 ALL THE MUSIC THAT'S CREATED BY MY
 25 MUSICIANS ARE PARTS THAT I SING TO THEM.

89



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

CONFIDENTIAL DEPOSITION OF ROBIN THICKE

1 SO BECAUSE OF MY -- MY TRAINED EAR,
 2 I'M ABLE TO KNOW IMMEDIATELY THE DIFFERENCE
 3 BETWEEN TWO NOTES AND TWO CHORDS.
 4 Q. OKAY. AND ARE THERE ANY CHORD
 5 PROGRESSIONS AT ALL THAT ARE REMOTELY THE SAME
 6 BETWEEN "GOT TO GIVE IT UP" AND BLURRED LINES?
 7 A. NO.
 8 Q. OKAY. AND AS WE TALKED ABOUT
 9 EARLIER, THEY DO NOT SHARE ANY OF THE SAME
 10 SYNCOPATION?
 11 A. SYNCOPATION OF WHICH INSTRUMENT?
 12 Q. YOU TELL ME. IS THERE ANYTHING
 13 THAT YOU BELIEVE THE SYNCOPATION IS SIMILAR?
 14 A. THE KICK DRUM.
 15 Q. OKAY. IS THAT IT?
 16 A. YES.
 17 Q. OKAY.
 18 A. BECAUSE IT'S ONE, TWO, THREE, FOUR,
 19 AS IS 90 PERCENT OF POP SONGS ON THE RADIO.
 20 Q. OKAY. DID YOU DECIDE TO ADD
 21 HARMONY TO THE BACKUP VOCALS EACH TIME YOU USED
 22 THE WORD "GOOD GIRL"?
 23 A. I -- I RECALL THAT THAT WAS MY
 24 IDEA; THAT PHARRELL CAME UP WITH THE CHORUS. HE
 25 SAID, "SHE'S A GOOD GIRL. I KNOW YOU YOU WANT

90

1 IT." I REMEMBER THE FACE: "I KNOW YOU WANT IT,"
 2 LIKE THAT.
 3 AND THEN I WENT IN AND I SAID, "OH,
 4 THAT'S AMAZING." I WENT IN AND I PUT IT DOWN AND
 5 THEN I STARTED ADDING THE HARMONIES. I BELIEVE
 6 THE HARMONIES WERE MY IDEA.
 7 Q. WHY DID YOU DECIDE TO ADD HARMONY
 8 TO THE BACKUP VOICES EACH TIME YOU USED THE WORD
 9 "GOOD GIRL"?
 10 A. BECAUSE I WANTED IT TO HAVE LIKE
 11 A -- ALMOST A DAVID BOWIE-ESQUE ROCK AND ROLL KIND
 12 OF A HARMONY. THAT'S WHY IT GOES "GOOD GIRL."
 13 IT'S A LITTLE -- IT'S MORE HUMOROUS THAN IT IS
 14 POWERFUL.
 15 Q. DOES IT HAVE -- DOES THAT HAVE --
 16 DOES -- DOES THE USE OF HARMONY TO THE BACK -- TO
 17 THE BACKUP VOICES EACH TIME YOU USED THE WORD
 18 "GOOD GIRL" HAVE ANYTHING TO DO WITH AN INTENT TO
 19 REPLICATE "GOT TO GIVE IT UP"?
 20 A. AS FAR -- TO MY KNOWLEDGE, THERE
 21 ARE NO HARMONIES IN "GOT TO GIVE IT UP."
 22 Q. OKAY.
 23 A. OH, WAIT. WAIT. NO. THE -- THE
 24 VAMP GOES "GOT TO GIVE IT UP." THERE'S A TWO-PART
 25 HARMONY. MINE IS A FOUR-PART HARMONY.

91

1 Q. OKAY.
 2 A. AND THE ANSWER IS NO, THERE WAS
 3 ABSOLUTELY NO DESIRE.
 4 Q. OKAY. WHAT IS THE -- WHAT IS THE
 5 HOOK, IN YOUR VIEW, OF BLURRED LINES?
 6 A. "SHE'S A GOOD GIRL. I KNOW YOU
 7 WANT IT. I KNOW YOU WANT IT."
 8 Q. OKAY.
 9 A. THAT -- THAT WOULD BE THE HOOK.
 10 Q. WHAT DID YOU ADD TO THE VOCALS OR
 11 INSTRUMENTALS?
 12 A. I ADDED NOTHING TO THE
 13 INSTRUMENTALS.
 14 VOCALLY, ALL THE VOCALS ARE MINE
 15 EXCEPT FOR PHARRELL DOING SOME "HEY" AND
 16 "EVERYBODY GET UP." HE SAYS "EVERYBODY GET UP"
 17 AND HE -- AND HE DOES SOME "HEYS" AND LIKE TALKING
 18 IN LITTLE SPOTS. BUT ALL THE OTHER VOCALS ARE
 19 MINE.
 20 Q. OKAY. WAS IT YOUR IDEA TO SING A
 21 FALSETTO?
 22 A. NO. IT WAS MY IDEA TO DO FALSETTO
 23 IN THE SECOND VERSE WITH A DIFFERENT MELODY FROM
 24 THE FIRST VERSE.
 25 THE FIRST VERSE WAS ALREADY

92

1 FALSETTO; HOWEVER, PHARRELL SINGS A LITTLE HIGHER
 2 THAN ME. SO IF -- HE MIGHT HAVE SANG THE VERSE TO
 3 ME IN HIS REGULAR VOICE AND THEN I SAID, "I HAVE
 4 TO DO THAT IN FALSETTO."
 5 "IF YOU CAN'T HEAR WHAT I'M TRYING
 6 TO SAY." THAT WOULD HAVE -- MIGHT -- THAT -- THAT
 7 MIGHT HAVE BEEN SOMETHING HE CAN SING IN HIS
 8 REGULAR VOICE AND I MIGHT HAVE HAD TO CHANGE IT TO
 9 FALSETTO SO IT FIT MY VOICE.
 10 Q. OKAY.
 11 A. THE ONLY PART OF THE SONG I
 12 REMEMBER COMING UP WITH IS THE SECOND VERSE
 13 MELODY. OTHERWISE, HE GENIUSED THE WHOLE THING.
 14 Q. YOU JUST SAID A SECOND AGO THAT
 15 THERE IS NO HARMONY ON THE VOCAL LINES IN "GOT TO
 16 GIVE IT UP."
 17 A. I CORRECTED MYSELF --
 18 Q. OKAY.
 19 A. -- RIGHT AFTER THAT, YEAH. OKAY.
 20 Q. I THINK YOU MENTIONED ONE THING.
 21 A. I MENTIONED THE ENDING, YES --
 22 Q. RIGHT.
 23 A. -- THE VAMP, YES.
 24 Q. BUT I WANT TO ASK YOU: ISN'T IT
 25 TRUE THAT THERE'S HARMONY WITH THE HOOK OF THE

93

Kelli Norden and Associates
 Court Reporters
 310.520.7733 phone 310.520.7933 fax
 11835 W. Olympic Boulevard Suite 630E
 Los Angeles, California 90064
 kna@kellinorden.com www.kellinorden.com

CONFIDENTIAL DEPOSITION OF ROBIN THICKE

1 FALSETTO IS A DIFFERENT TYPE OF A VOCAL -- OF
 2 VOCAL INSTRUMENTATION.
 3 Q. THE PERFORMANCE ELEMENT OF FALSETTO
 4 IS AN ARRANGE-- IS AN ARRANGEMENT CHOICE, NOT
 5 A --
 6 A. NO.
 7 Q. -- MUSICAL NOTATION.
 8 IT'S NOT?
 9 A. NO, IT'S -- IT'S A -- IT'S AN
 10 INSTRUMENTAL CHOICE OF THE VOCAL ABILITY.
 11 Q. OKAY.
 12 A. IF THAT MAKES SENSE. THE SAME WAY
 13 A BARITONE, ALTO, SOPRANO, FALSETTO IS A -- IS A
 14 TYPE -- IS A WAY -- WAY OF SINGING.
 15 Q. OKAY.
 16 A. THAT IS COMPLETELY NATURAL TO ANY
 17 VOCALIST. AT LEAST IT WAS TILL I STARTED SMOKING
 18 SO MUCH.
 19 TYPE IT. TYPE IT IN. GET IT IN
 20 THERE.
 21 Q. DO YOU KNOW HOW MUCH MONEY YOU HAVE
 22 MADE ON "BLURRED LINES"?
 23 A. I HAVE NO IDEA.
 24 Q. WHO WOULD KNOW THAT INFORMATION?
 25 A. MAYBE CHRIS, MY MANAGEMENT, MIGHT

98

1 BY MR. BUSCH:
 2 Q. OH, BEFORE I ASK YOU QUESTIONS
 3 ABOUT THIS EXHIBIT 35 --
 4 A. UH-HUH.
 5 Q. -- I HAVE A COUPLE OF QUESTIONS FOR
 6 YOU.
 7 A. OKAY.
 8 Q. DID -- HAVE YOU AND PHARRELL --
 9 OKAY. HAVE YOU AND PHARRELL WILLIAMS SPOKEN ABOUT
 10 THIS CASE?
 11 A. NO.
 12 Q. HAVE YOU AND PHARRELL SPOKEN ABOUT
 13 HIS TESTIMONY IN THIS CASE?
 14 A. NO.
 15 Q. HAVE YOU BEEN ADVISED BY ANYONE
 16 OTHER THAN YOUR ATTORNEY -- BECAUSE THAT'S
 17 PRIVILEGED INFORMATION THAT I'M NOT ENTITLED TO
 18 KNOW.
 19 A. OKAY.
 20 Q. BUT HAVE YOU BEEN ADVISED BY YOUR
 21 ATTORNEY ABOUT WHAT PHARRELL WILLIAMS TESTIFIED IN
 22 THIS CASE WHEN I CONDUCTED A DEPOSITION OF HIM THE
 23 OTHER DAY?
 24 A. NO.
 25 Q. OKAY. DID YOU SPEAK TO ANYONE IN

100

1 KNOW, OR MY LAWYER, JAMIE ROBERTS. BUT NO, I
 2 DON'T REALLY PAY MUCH ATTENTION TO MY FINANCES.
 3 Q. OKAY. SO YOU DON'T KNOW THE
 4 MECHANICAL ROYALTIES --
 5 A. NO.
 6 Q. -- THAT YOU'VE MADE, YOU DON'T KNOW
 7 THE RECORD ROYALTIES, ARTIST ROYALTIES, NONE OF
 8 THAT?
 9 A. NO, NO IDEA.
 10 Q. OKAY. YOU DON'T KNOW --
 11 A. I DON'T EVEN KNOW IF I'VE BEEN PAID
 12 FOR IT YET.
 13 Q. OKAY. AND AS FAR AS YOU DO REALIZE
 14 THAT IF YOU WERE TO NOT WIN THIS CASE --
 15 A. UH-HUH.
 16 Q. -- THAT YOUR ABILITY TO RECEIVE
 17 INCOME FROM "BLURRED LINES" MIGHT BE AFFECTED?
 18 A. OF COURSE.
 19 Q. OKAY. I'M GOING TO MARK AS THE
 20 NEXT EXHIBIT AN INTERVIEW THAT YOU DID WITH
 21 "BILLBOARD MAGAZINE."
 22 A. OKAY.
 23 MR. BUSCH: MARK THAT AS --
 24 WHAT NUMBER ARE WE UP TO?
 25 DEPOSITION OFFICER: 35.

99

1 THE WORLD, OUTSIDE OF YOUR ATTORNEYS OR THE
 2 PRESENCE OF YOUR ATTORNEYS, ABOUT WHAT YOU WOULD
 3 SAY WITH RESPECT TO THE PUBLIC INTERVIEWS YOU GAVE
 4 WHERE YOU DID SAY THAT -- WHERE YOU DID REFERENCE
 5 MARVIN GAYE'S SONG "GOT TO GIVE IT UP"?
 6 A. NO.
 7 Q. OKAY.
 8 A. I'VE BEEN BUSY.
 9 (WHEREUPON, DEFENDANTS' EXHIBIT NUMBER
 10 35 WAS MARKED FOR IDENTIFICATION BY
 11 THE DEPOSITION OFFICER AND IS ATTACHED
 12 HERETO.)
 13 DEPOSITION OFFICER: THERE YOU GO.
 14 THE DEPONENT: THANK YOU, LOVE.
 15 OH, WHEN I WAS -- OH, I MISS BEING
 16 SKINNY LIKE THAT. LOOKED GOOD BACK THEN.
 17 BY MR. BUSCH:
 18 Q. OKAY. I'M SHOWING YOU NOW AN
 19 INTERVIEW THAT YOU GAVE WITH "BILLBOARD MAGAZINE."
 20 A. OKAY.
 21 Q. AND I'M TURNING -- GOING TO TURN
 22 YOUR ATTENTION TO THE SECOND PAGE OF THIS --
 23 A. YEP.
 24 Q. -- WHERE YOU SAY -- LIKE THE FIRST,
 25 SECOND -- FOURTH LINE --

101

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 www.kellinorden.com

CONFIDENTIAL DEPOSITION OF ROBIN THICKE

1 A. UH-HUH.
 2 Q. -- DOWN -- FOURTH PARAGRAPH DOWN, I
 3 SHOULD --
 4 A. GOT IT.
 5 Q. -- SAY, WHERE IT SAYS, QUOTE:
 6 "PHARRELL AND I WERE IN
 7 THE STUDIO, MAKING A COUPLE OF
 8 RECORDS, AND THEN ON THE THIRD
 9 DAY, I TOLD HIM I WANTED TO DO
 10 SOMETHING KIND OF LIKE MARVIN
 11 GAYE'S 'GOT TO GIVE IT UP,' THAT
 12 KIND OF FEEL, BECAUSE IT'S ONE
 13 OF MY FAVORITE SONGS OF ALL
 14 TIME. SO HE STARTED MESSING
 15 WITH SOME DRUMS AND THEN HE
 16 STARTED GOING "HEY, HEY, HEY,"
 17 AND ABOUT AN HOUR AND A HALF
 18 LATER, WE HAD THE WHOLE RECORD
 19 FINISHED."
 20 THAT'S NOT TRUE, IS IT?
 21 A. NO.
 22 Q. IT IS CORRECT THAT THAT'S NOT TRUE?
 23 A. IT IS CORRECT THAT THAT'S NOT TRUE.
 24 SURE WISH IT WAS MY IDEA.
 25 Q. WERE ANY REFERENCE RECORDINGS

102

1 REMEMBER SAYING, BUT I DO GENERALLY REMEMBER
 2 TRYING TO SELL -- SELL THE PUBLIC ON THE FACT THAT
 3 "BLURRED LINES" WAS MY IDEA IN SOME WAY.
 4 Q. AND THAT IT WAS INSPIRED BY MARVIN
 5 GAYE'S "GOT TO GIVE IT UP"?
 6 A. AND THAT IT WAS -- YES, BECAUSE
 7 AFTER -- BECAUSE -- BECAUSE AFTER PEOPLE CONNECTED
 8 THE TWO, I WAS LIKE, "YEAH, YOU KNOW, WE WERE -- I
 9 WANTED TO MAKE SOMETHING LIKE THAT." BUT ...
 10 Q. OKAY. BUT THAT WAS NOT TRUE?
 11 A. I CAN'T TAKE CREDIT FOR THAT, NO.
 12 Q. SO JUST SO WE'RE CLEAR, THE PARTS
 13 OF THE INTERVIEW THAT I READ, YOU'RE NOT DENYING
 14 THAT YOU SAID?
 15 A. I DID -- I DID SAY THOSE THINGS;
 16 HOWEVER, I WOULD LIKE TO RECLARIFY THAT I WAS -- I
 17 HAD A DRUG AND ALCOHOL PROBLEM FOR THE YEAR AND I
 18 DIDN'T DO A SOBER INTERVIEW. SO I DON'T RECALL
 19 MANY THINGS THAT I SAID.
 20 Q. OKAY.
 21 A. IN FACT, I WAS QUITE SURPRISED WHEN
 22 I READ THEM BACK SOMETIMES.
 23 MR. BUSCH: ALL RIGHT. LET'S MARK
 24 AS THE NEXT EXHIBIT A TRANSCRIPTION OF A VIDEO.
 25 ///

104

1 PLAYED IN THE STUDIO SESSION AT THE TIME THAT
 2 "BLURRED LINES" WAS BEING CREATED?
 3 A. NO.
 4 Q. OKAY.
 5 A. I -- MOST MUSICIANS, THEY NEVER
 6 WORK LIKE THAT. I WOULD NEVER -- YOU NEVER WANT
 7 OTHER MUSIC WHEN YOU'RE IN THE STUDIO, EVEN IF YOU
 8 WERE -- TAKE YOU OUT.
 9 Q. OKAY. LET'S -- YOU CAN PUT THAT
 10 DOCUMENT AWAY.
 11 A. OKAY.
 12 Q. AND I'M GOING TO MOVE ON TO ANOTHER
 13 INTERVIEW THAT YOU GAVE.
 14 A. OKAY.
 15 Q. NOW, I DON'T BELIEVE THAT I ASKED
 16 YOU THIS QUESTION, BUT YOU ARE NOT DISPUTING THAT
 17 YOU SAID THOSE WORDS THAT ARE IN THAT INTERVIEW
 18 OR --
 19 A. OF COURSE.
 20 Q. -- OR IN THE PRIOR INTERVIEWS THAT
 21 I'VE SHOWED YOU?
 22 A. WITH -- WITH ALL DUE RESPECT, I WAS
 23 HIGH AND DRUNK EVERY TIME I DID AN INTERVIEW LAST
 24 YEAR.
 25 SO THERE ARE SOME QUOTES I DON'T

103

1 BY MR. BUSCH:
 2 Q. WE HAVE VIDEOS THAT --
 3 A. OKAY.
 4 Q. -- YOU'VE GIVEN, AND I'M GOING TO
 5 MARK AS AN EXHIBIT THE VIDEOS AT SOME -- AT THE
 6 END OF THIS DEPOSITION.
 7 A. OKAY.
 8 Q. BUT THIS IS A TRANSCRIPTION OF ONE
 9 OF YOUR VIDEO INTERVIEWS, I BELIEVE -- YES -- FROM
 10 FUSE T.V.
 11 A. OKAY.
 12 (WHEREUPON, DEFENDANTS' EXHIBIT NUMBER
 13 36 WAS MARKED FOR IDENTIFICATION BY
 14 THE DEPOSITION OFFICER AND IS ATTACHED
 15 HERETO.)
 16 BY MR. BUSCH:
 17 Q. WERE YOU DRUNK AND ON VICODIN WHEN
 18 YOU DID THE "OPRAH SHOW"?
 19 A. YES.
 20 DEPOSITION OFFICER: THIS IS
 21 EXHIBIT 36.
 22 BY MR. BUSCH:
 23 Q. AND I DON'T MEAN ANY OFFENSE BY
 24 THIS --
 25 A. NO. PLEASE.

105

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 www.kellinorden.com

CONFIDENTIAL DEPOSITION OF ROBIN THICKE

1 Q. -- BUT BASED ON THAT TESTIMONY, I
 2 HAVE TO ASK YOU.
 3 A. YES.
 4 Q. ARE YOU DRUNK OR ON ANY DRUGS
 5 TODAY?
 6 A. NO. I'VE -- I'VE BEEN SOBER FOR
 7 THE LAST TWO MONTHS.
 8 Q. ALL RIGHT.
 9 A. WHEN YOUR WIFE LEAVES YOU, IT GIVES
 10 YOU GOOD REASON TO SOBER UP.
 11 Q. OKAY. ALL RIGHT. TAKE A LOOK AT
 12 WHAT I'VE MARKED AS THE NEXT EXHIBIT.
 13 WHAT NUMBER IS THIS, KELLI?
 14 DEPOSITION OFFICER: 36.
 15 BY MR. BUSCH:
 16 Q. 36. THIS IS A TRANSCRIPTION OF AN
 17 INTERVIEW YOU GAVE WITH FUSE T.V. WHERE YOU SAID,
 18 QUOTE:
 19 "I SAID TO PHARRELL, YOU
 20 KNOW, I'D LIKE TO DO SOMETHING
 21 LIKE MARVIN GAYE'S 'GOT TO GIVE
 22 IT UP,' SOMETHING WITH THAT
 23 FEEL, AND SO WE JUST STARTED
 24 MESSING WITH DRUMS. THEN HE
 25 SAID, 'HEY, HEY, HEY' AND I WAS

106

1 THE DEPONENT: -- RECOLLECTION.
 2 MR. KING: OBJECT TO FORM.
 3 BY MR. BUSCH:
 4 Q. OKAY. WE HAVE A VIDEO OF IT.
 5 A. OKAY. YEAH. THAT'S HOW -- YOU CAN
 6 SHOW IT, BUT I -- I DON'T REMEMBER GOING TO FUSE
 7 T.V.
 8 Q. OKAY.
 9 A. I DON'T EVEN REMEMBER.
 10 Q. WOULD -- WOULD SEEING THE INTERVIEW
 11 HELP YOU?
 12 A. IF THAT HELPS -- IF IT GIVES YOU --
 13 (SPEAKING SIMULTANEOUSLY.)
 14 MR. BUSCH: CAN WE SEE THE TRACK
 15 LISTING, PLEASE.
 16 THE DEPONENT: I DON'T EVEN
 17 REMEMBER VISITING FUSE.
 18 MR. KING: MAYBE THEY CAME TO YOU.
 19 THE DEPONENT: YEAH, MAYBE THEY
 20 CAME TO WHERE WE WERE.
 21 MR. BUSCH: THE CLIP FUSE IS NUMBER
 22 FIVE.
 23 MR. KING: FINALLY, I'M GETTING
 24 SOME USE OUT OF THIS T.V. I PAID FOR.
 25 MR. BUSCH: I HAVE THIS GUY SITTING

108

1 LIKE, 'I LOVE THAT.' I HOPPED
 2 IN THE BOOTH, I PUT THAT DOWN,
 3 AND THE REST OF THE SONG JUST
 4 CAME FLYING OUT, LIKE ONE LINE
 5 AFTER ANOTHER."
 6 A. YOU NOTICE HOW IN EVERY INTERVIEW,
 7 ALMOST IN ORDER, I START TAKING MORE AND MORE
 8 CREDIT? THAT NOW I STARTED, "WE STARTED MESSING
 9 WITH THE DRUMS," WHEN I HAD NOTHING TO DO WITH THE
 10 DRUMS.
 11 SO YOU CAN SEE THAT I STARTED -- I
 12 CONTINUED TO TRY TO TAKE MORE AND MORE CREDIT FOR
 13 THE CREATION OF THIS RECORD.
 14 Q. OKAY. AND NOTHING --
 15 A. WHICH I CAN'T TAKE.
 16 Q. AND YOU DON'T DENY SAYING THIS?
 17 A. THIS, I HAVE NO RECOLLECTION OF
 18 THIS INTERVIEW AT ALL.
 19 Q. OKAY. BUT ARE YOU DENYING THAT YOU
 20 SAID THESE WORDS?
 21 A. I AM NOT --
 22 (SPEAKING SIMULTANEOUSLY.)
 23 MR. KING: OBJECTION --
 24 THE DEPONENT: -- DENYING --
 25 MR. KING: -- OBJECT --

107

1 HERE, SO I MIGHT AS WELL PLAY IT.
 2 THE DEPONENT: WE GOT SOME -- YOU
 3 GOING TO HAVE SOME -- THROW SOME WORLD CUP
 4 PARTIES?
 5 (WHEREUPON, VIDEO CLIP WAS PLAYED.)
 6 BY MR. BUSCH:
 7 Q. OKAY.
 8 A. YEAH.
 9 Q. SO THAT -- THAT'S YOU; RIGHT?
 10 A. YEAH.
 11 Q. AND YOU DON'T DENY SAYING THOSE
 12 WORDS?
 13 A. WELL, I CAN'T DENY IT.
 14 Q. RIGHT.
 15 A. I MEAN, IT'S --
 16 Q. OKAY.
 17 A. IT'S VISUAL REFERENCE.
 18 MR. BUSCH: ALL RIGHT. AND WE'RE
 19 GOING TO MARK -- WE HAVE ALL THE VIDEO CLIPS ON A
 20 D.V.D., HOWARD, AND AT THE END OF THIS DEPOSITION
 21 I'M GOING TO MARK -- REMIND ME TO MARK THOSE
 22 SEPARATELY AS AN EXHIBIT, PLEASE.
 23 MR. KING: KELLI, REMIND HIM TO
 24 MARK THOSE AS AN EXHIBIT.
 25 MR. BUSCH: JUDITH, REMIND ME TO

109



CONFIDENTIAL DEPOSITION OF ROBIN THICKE

1 MARK THEM AS AN EXHIBIT.
 2 THE DEPONENT: CHRIS, REMIND HIM TO
 3 REMIND ME --
 4 (LAUGHTER.)
 5 BY MR. BUSCH:
 6 Q. ALL RIGHT.
 7 A. YEAH.
 8 Q. ALL RIGHT. LET'S MARK AS THE NEXT
 9 EXHIBIT AN INTERVIEW YOU GAVE WITH V.H.-1.
 10 A. OKAY.
 11 Q. AND --
 12 A. I'M GOING TO SWITCH --
 13 Q. -- AGAIN --
 14 A. EXCUSE ME. I AM GOING TO SWITCH MY
 15 MIC TO MY T-SHIRT. ALL RIGHT? OKAY.
 16 Q. OKAY. THIS IS -- WE HAVE A VIDEO
 17 OF THIS.
 18 A. OKAY.
 19 MR. BUSCH: DO YOU HAVE THE V.H.-1
 20 CLIP? JUST A CLIP, V.H.-1.
 21 TECHNICIAN: THIS ONE?
 22 MR. BUSCH: NO. IT'S NUMBER SEVEN.
 23 HOLD ON AN SEC. DON'T PLAY IT YET.
 24 STOP IT.
 25 ///

110

1 YOUR VIDEO WITH V.H.-1, AND THIS IS WHAT YOU WILL
 2 SEE IN THE VIDEO YOU SAID.
 3 A. OKAY.
 4 Q (READING):
 5 "WELL, PHARRELL AND I WENT
 6 INTHE STUDIO AND, YOU KNOW, I
 7 HAD MENTIONED TO HIM THAT ONE OF
 8 MY FAVORTE SONGS OF ALL TIME IS
 9 MARVIN GAYE'S 'GOT TO GIVE IT
 10 UP.' AND SO WE TRIED TO GET A
 11 LITTLE GROOVE LIKE THAT GOING.
 12 AND THEN WE STARTED DANCING
 13 AROUND THE STUDIO LIKE OLD MEN,
 14 HOLLERING AT YOUNG GIRLS FROM
 15 PORCH (SIC), YOU KNOW, LIKE
 16 HEY, HEY, HEY,' YOU KNOW. WE
 17 REALLY WROTE THE WHOLE SONG IN
 18 ABOUT A HALF AN HOUR, BECAUSE
 19 ONCE WE HAD A LITTLE TRACK, WE
 20 WENT INTO THE BOOTH TOGETHER,
 21 AND, LIKE, I WOULD SING A LINE
 22 AND HE'D GO, 'HEY, HEY, HEY' OR
 23 UH-HUH' OR HE WOULD LIKE, 'HEY,
 24 GIRL. COME HERE.' YOU KNOW, WE
 25 JUST HAD SUCH A GREAT TIME THAT

112

1 BY MR. BUSCH:
 2 Q. OKAY. WE'RE GOING TO -- I'M GOING
 3 TO PLAY THE VIDEO CLIP OF THAT, AND I ALSO HAVE A
 4 TRANSCRIPTION THAT I'LL MARK AS AN EXHIBIT.
 5 SO MARK THE TRANSCRIPTION AS THE
 6 NEXT EXHIBIT.
 7 DEPOSITION OFFICER: THAT'S 37.
 8 MR. BUSCH: 37.
 9 (WHEREUPON, DEFENDANTS' EXHIBIT NUMBER
 10 37 WAS MARKED FOR IDENTIFICATION BY
 11 THE DEPOSITION OFFICER AND IS ATTACHED
 12 HERETO.)
 13 MR. BUSCH: AND BEFORE YOU PLAY IT,
 14 I WANT TO READ THE RECORD, EXACTLY WHAT IT SAYS,
 15 BECAUSE SHE'S NOT GOING TO TAKE DOWN THE VIDEO.
 16 THE DEPONENT: GOT IT.
 17 DEPOSITION OFFICER: AND CAN YOU
 18 SLOWDOWN A BIT?
 19 MR. BUSCH: YES. I'LL TRY.
 20 BY MR. BUSCH:
 21 Q. OKAY. ARE YOU READY NOW? DO YOU
 22 HAVE THE DOCUMENT?
 23 A. I DON'T HAVE THE DOCUMENT.
 24 Q. ALL RIGHT. SO, MR. THICKE, LOOKING
 25 AT EXHIBIT NUMBER 37, WE HAVE A TRANSCRIPTION OF

111

1 WHEN WE DID THE VIDEO, I WANTED
 2 TO MAKE SURE WE KEPT THAT ENERGY
 3 AND THAT SENSE OF HUMOR. SO I
 4 HAD PHARRELL DO SOME OLD MEN
 5 DANCES. AND WHEN T.I. SHOWED
 6 UP, I WAS LIKE, 'HEY, MAN, CAN
 7 YOU DO SOME OLD-MAN-LIKE-YOUR-
 8 GRANDPA-AT-A-WEDDING KIND OF
 9 DANCES,' AND T.I. WENT RIGHT FOR
 10 IT. HE WAS FEARLESS. HE WENT
 11 RIGHT FOR IT. HE GAVE US SOME
 12 RED FOX MAGIC."
 13 A. YES.
 14 MR. BUSCH: OKAY. SO LET'S PLAY
 15 THE VIDEO.
 16 YES, NUMBER SEVEN.
 17 A. NOTICE HOW I KEEP TAKING MORE AND
 18 MORE CREDIT EVERY --
 19 (WHEREUPON, VIDEO CLIP WAS PLAYED.)
 20 MR. BUSCH: MAKE IT LOUDER, PLEASE.
 21 (CONCLUSION OF VIDEO CLIP.)
 22 MR. KING: THAT'S NOT THE WHOLE
 23 CLIP.
 24 MR. BUSCH: THAT'S NOT -- THAT'S
 25 NOT THE WHOLE CLIP.

113



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 www.kellinorden.com

CONFIDENTIAL DEPOSITION OF ROBIN THICKE

1 THE DEPONENT: IT DOESN'T MATTER.
 2 THE REST OF THE CLIP IS ALL ABOUT THE VIDEO, NOT
 3 ABOUT THE SONG.
 4 BY MR. BUSCH:
 5 Q. OKAY.
 6 A. WE DON'T -- WE DON'T NEED TO SHOW
 7 THE REST.
 8 Q. ALL RIGHT. SO, MR. THICKE --
 9 A. YES.
 10 Q. -- WHAT YOU SAID IN THAT V.H.-1
 11 INTERVIEW THAT WE JUST HEARD AND IN THE FUSE T.V.
 12 VIDEO THAT WE HEARD A MOMENT AGO, WHAT YOU SAID
 13 ABOUT THE CREATION OF THE SONG AND THE SPEAKING OF
 14 PHARRELL ABOUT "GOT TO GIVE IT UP" AND TRYING TO
 15 GET A LITTLE GROOVE LIKE "GOT TO GIVE IT UP"
 16 GOING, NONE OF THAT IS TRUE?
 17 A. NONE OF THAT'S TRUE.
 18 Q. OKAY.
 19 OKAY. LET'S MARK AS EXHIBIT -- THE
 20 NEXT EXHIBIT AN INTERVIEW THAT YOU DID WITH "VEVO"
 21 IN 2013.
 22 A. OKAY.
 23 MR. BUSCH: EXHIBIT 38?
 24 DEPOSITION OFFICER: CORRECT.
 25 ///

114

1 Q. AND EVERYTHING THAT YOU SAID IN
 2 THAT INTERVIEW THAT WE JUST HEARD IS NOT TRUE;
 3 CORRECT?
 4 A. NO, THAT IS CORRECT, THAT THAT IS
 5 NOT TRUE.
 6 Q. OKAY.
 7 THE VIDEOGRAPHER: MR. BUSCH, CAN I
 8 HAVE YOU RAISE YOUR MICROPHONE THERE, SIR,
 9 IT'S --
 10 MR. BUSCH: OKAY.
 11 THE VIDEOGRAPHER: THANK YOU.
 12 BY MR. BUSCH:
 13 Q. OKAY. AND APOLOGIZE FOR HAVING TO
 14 ASK THIS AGAIN, BUT --
 15 A. NO, OF COURSE.
 16 Q. -- WERE YOU DRUNK AND ON VICODIN AT
 17 THE TIME?
 18 A. YES, SIR.
 19 Q. OKAY.
 20 A. SORRY. THAT'S WHY I'M STARTING TO
 21 FEEL A LITTLE SAD, 'CUZ --
 22 Q. OKAY.
 23 A. -- I'M -- I HAD A TOUGH YEAR.
 24 Q. ALL RIGHT. LET'S GO --
 25 MR. KING: IF YOU NEED A BREAK,

116

1 BY MR. BUSCH:
 2 Q. AND, MR. THICKE, I DO HAVE TO ASK
 3 YOU: WHEN YOU -- WHEN YOU DID THE INTERVIEW THAT
 4 WE JUST PLAYED FROM V.H.-1, WERE YOU DRUNK AND ON
 5 VICODIN?
 6 A. I WAS -- I DIDN'T DO A SINGLE
 7 INTERVIEW LAST YEAR WITHOUT BEING HIGH ON BOTH.
 8 Q. OKAY. SO THE ANSWER TO MY QUESTION
 9 IS "YES"?
 10 A. YES.
 11 Q. OKAY.
 12 (WHEREUPON, DEFENDANTS' EXHIBIT NUMBER
 13 38 WAS MARKED FOR IDENTIFICATION BY
 14 THE DEPOSITION OFFICER AND IS ATTACHED
 15 HERETO.)
 16 DEPOSITION OFFICER: HERE YOU GO.
 17 THE DEPONENT: THANK YOU.
 18 MR. BUSCH: LET'S JUST PLAY THE
 19 CLIP, THE VIDEO FROM THE CLIP ON -- THIS IS
 20 "VEVO," TRACK NINE.
 21 (WHEREUPON, VIDEO CLIP WAS PLAYED.)
 22 BY MR. BUSCH:
 23 Q. ALL RIGHT. SO, MR. THICKE, THAT
 24 WAS YOU AND YOU DID THAT INTERVIEW?
 25 A. YEAH.

115

1 JUST LET HIM KNOW.
 2 THE DEPONENT: NO.
 3 BY MR. BUSCH:
 4 Q. SO --
 5 A. YEAH, I NEED A BREAK.
 6 THE VIDEOGRAPHER: DON'T FORGET
 7 YOUR MICROPHONES. AND WE'LL GO OFF THE VIDEOTAPE
 8 RECORD AT 2:23 P.M. THAT'S 2:23.
 9 AND THAT IS OFF.
 10 (WHEREUPON, A RECESS WAS HELD
 11 FROM 2:23 P.M. TO 2:31 P.M.)
 12 THE VIDEOGRAPHER: WE'RE BACK ON
 13 THE VIDEOTAPE RECORD, BEGINNING DISK NUMBER THREE
 14 OF VOLUME NUMBER 1 AT 2:31 P.M.
 15 BY MR. BUSCH:
 16 Q. HAD I STARTED THIS LAST ONE? I
 17 DON'T THINK I DID.
 18 I DO HAVE TO ASK YOU A FEW
 19 QUESTIONS.
 20 A. YES.
 21 MR. KING: YOU DID "VEVO" --
 22 MR. BUSCH: WE DID THE "VEVO."
 23 MR. KING: YOU DID THE "VEVO" ONE.
 24 MR. BUSCH: IT'S DONE. WE DID
 25 "VEVO." OKAY.

117

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

CONFIDENTIAL DEPOSITION OF ROBIN THICKE

1 MR. KING: YES.
 2 BY MR. BUSCH:
 3 Q. ALL RIGHT. MR. THICKE, I DO NEED
 4 TO ASK YOU A FEW QUESTIONS --
 5 A. OKAY.
 6 Q. -- BECAUSE TO ME, IN THESE VIDEOS
 7 THAT I'M WATCHING --
 8 A. RIGHT.
 9 Q. -- YOU DON'T APPEAR EITHER DRUNK OR
 10 ON VICODIN.
 11 A. YES.
 12 Q. SO I DO HAVE TO ASK YOU SOME
 13 FOLLOW-UP QUESTIONS --
 14 A. THAT'S FINE.
 15 Q. -- ON THAT.
 16 DO YOU REMEMBER THE TIME OF DAY
 17 THAT YOU DID THE VIDEOS THAT WE'VE BEEN WATCHING?
 18 A. EVERY DAY I WOKE UP, I WOULD TAKE A
 19 VICODIN TO START THE DAY AND THEN I WOULD FILL UP
 20 A WATER BOTTLE WITH VODKA AND DRINK IT BEFORE AND
 21 DURING MY INTERVIEWS.
 22 Q. ALL RIGHT. SO HOW MANY VICODIN DO
 23 YOU BELIEVE YOU HAD TAKEN ON THE DAY OF THE
 24 INTERVIEWS PRIOR TO THE INTERVIEW?
 25 A. I WOULD SAY NORMALLY ONE OR TWO.

118

1 Q. OKAY.
 2 A. BUT ONE OR TWO DURING DURING THE --
 3 DURING THE MORNING AND AFTERNOON AND THEN A COUPLE
 4 MORE AT NIGHT.
 5 Q. OKAY. SO DO YOU KNOW THE TIME OF
 6 DAY THAT YOU DID THESE INTERVIEWS?
 7 A. I DON'T. THEY NORMALLY RAN TEN, 12
 8 HOURS A DAY, THAT WE'D START AT 8:00 IN THE
 9 MORNING AND FINISH AT 8:00 AT NIGHT. SO I DON'T
 10 KNOW. AT ANY TIME OF DAY, THOSE WERE TAKING
 11 PLACE.
 12 Q. OKAY.
 13 A. THE "OPRAH" ONE I REMEMBER BECAUSE
 14 IT STANDS OUT. IT WAS IN THE AFTERNOON.
 15 Q. OKAY. AND DO YOU REMEMBER HOW MANY
 16 VICODIN YOU WERE ON FOR THE "OPRAH" INTERVIEW, FOR
 17 EXAMPLE?
 18 A. DEFINITELY. IT WAS ACTUALLY A
 19 NORCO, WHICH IS LIKE TWO VICODIN IN ONE PILL.
 20 Q. OKAY.
 21 A. SO TWICE -- TWICE THE -- TWO TIMES
 22 THE POWER.
 23 Q. AND YOU SAID YOU ALSO FILLED UP A
 24 WATER BOTTLE -- WATER BOTTLE LIKE THE ONE IN FRONT
 25 OF YOU RIGHT NOW?

119

1 A. YEAH, JUST ABOUT THAT SAME SIZE,
 2 AND I WOULD HAVE THE WATER BOTTLE AND SIP IT.
 3 Q. AN EIGHT-OUNCE, 12-OUNCE WATER
 4 BOTTLE?
 5 A. ABOUT THAT.
 6 Q. OKAY. HAVE YOU EVER BEEN -- DURING
 7 THIS TIME PERIOD, WERE YOU EVER PULLED OVER,
 8 ARRESTED FOR D.U.I. OR ANYTHING LIKE THAT?
 9 A. NO, SIR.
 10 Q. ALL RIGHT.
 11 A. YEAH, I WAS PULLED OVER FOR SMOKING
 12 A JOINT IN THE BACK SEAT OF AN S.U.V. ON THE WAY
 13 TO THE AIRPORT IN NEW YORK CITY.
 14 Q. OKAY. BUT THAT'S -- THAT'S --
 15 A. BUT IT WASN'T MY D.U.I., SO NO.
 16 Q. OKAY.
 17 A. THE ANSWER WOULD BE NO.
 18 Q. OKAY.
 19 A. SORRY.
 20 Q. ALL RIGHT. GO TO --
 21 A. THIS IS WATER, BY THE WAY.
 22 Q. OKAY. THE NEXT INTERVIEW -- I HAVE
 23 A TRANSCRIPTION -- OH, THAT'S RIGHT.
 24 YOU HAVE -- DO YOU HAVE A
 25 PUBLICIST?

120

1 A. I DO. I HAVE A NEW PUBLICIST. I
 2 HAD A DIFFERENT PUBLICIST FOR -- FOR LAST YEAR.
 3 Q. WHO?
 4 A. BY THE NAME OF CARLEEN DONOVAN.
 5 Q. IS SHE WITH A FIRM?
 6 A. WHAT -- WHAT'S THE NAME OF
 7 CARLEEN'S FIRM?
 8 MR. KING: YOU CAN'T ASK HIM. SO
 9 IF YOU KNOW, YOU KNOW. IF YOU DON'T KNOW --
 10 THE DEPONENT: OH, I APOLOGIZE.
 11 EXCUSE ME. I DO NOT KNOW THE NAME OF THE
 12 PUBLICITY FIRM.
 13 BY MR. BUSCH:
 14 Q. CARLEEN DONOVAN IS HER NAME?
 15 A. CARLEEN DONOVAN.
 16 Q. C-A-R-L-E-E-N?
 17 A. YES.
 18 Q. D-O-N-O-V-A-N?
 19 A. YES, SIR.
 20 Q. OKAY. AND WHY IS SHE NO LONGER
 21 YOUR PUBLICIST?
 22 A. THERE'S A FRIEND OF MINE IN THE
 23 BUSINESS WHO USES SOMEBODY ELSE THAT I HAD WANTED
 24 TO WORK WITH FOR AWHILE.
 25 MY MANAGEMENT -- WHEN I -- WHEN

121

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

CONFIDENTIAL DEPOSITION OF ROBIN THICKE

1 I -- I HAD NEW MANAGEMENT ABOUT -- I'M SORRY.
 2 I GOT NEW MANAGEMENT ABOUT A YEAR
 3 AND A HALF AGO, RIGHT BEFORE THIS HAPPENED, AND
 4 THIS WAS SOMEBODY THAT HE WORKED WITH, MY NEW
 5 MANAGER, AND HE THOUGHT SHE WOULD BE A GOOD FIT
 6 FOR ME.
 7 SHE DID A NICE JOB, BUT I THOUGHT
 8 THAT THIS NEW PERSON, SHAWN SACHS, WOULD BE A
 9 BETTER FIT FOR ME.
 10 Q. SO CARLEEN DID NOT DO ANYTHING
 11 WRONG?
 12 A. NO, NOT AT ALL.
 13 Q. OKAY. WAS CARLEEN AWARE THAT WHEN
 14 YOU WERE DOING INTERVIEWS, YOU WERE --
 15 A. NO.
 16 Q. -- TAKING VICODIN?
 17 A. NO, I --
 18 MR. KING: OBJECTION. OBJECT TO
 19 THE --
 20 THE DEPONENT: I WASN'T --
 21 MR. KING: -- FORM.
 22 THE DEPONENT: -- SHARING THAT
 23 INFORMATION WITH ANYBODY.
 24 BY MR. BUSCH:
 25 Q. SO -- SO IF I WERE TO ASK HER

122

1 A. NO, OF COURSE NOT. EVERYBODY JUST
 2 THOUGHT I WAS ENTERTAINING.
 3 MR. BUSCH: OKAY. LET'S MARK AS
 4 THE NEXT EXHIBIT A TRANSCRIPTION OF AN INTERVIEW
 5 THAT WE ARE GOING TO PLAY THE VIDEO FOR THAT HE --
 6 THAT MR. THICKE DID WITH "HOT 9" -- HOLD ON ONE
 7 SECOND.
 8 MR. KING: -7.
 9 MR. BUSCH: YEAH, BUT IT'S NOT THE
 10 RIGHT ...
 11 THE DEPONENT: EXCUSE ME.
 12 MR. BUSCH: OH, YES, IT IS. YEAH,
 13 "HOT 97."
 14 DEPOSITION OFFICER: THIS IS
 15 EXHIBIT 39.
 16 (WHEREUPON, DEFENDANTS' EXHIBIT NUMBER
 17 39 WAS MARKED FOR IDENTIFICATION BY
 18 THE DEPOSITION OFFICER AND IS ATTACHED
 19 HERETO.)
 20 DEPOSITION OFFICER: HERE YOU GO.
 21 THE DEPONENT: THANK YOU.
 22 BY MR. BUSCH:
 23 Q. SO --
 24 A. SINCE I AM UNDER OATH, I WOULD LIKE
 25 TO CLARIFY ONE STATEMENT THAT I MADE EARLIER WHEN

124

1 WHETHER YOU WENT AND DID INTERVIEWS ON VICODIN OR
 2 ON ALCOHOL --
 3 A. YEAH.
 4 Q. -- TO THE BEST OF YOUR KNOWLEDGE --
 5 A. I CAN'T SPEAK FOR HER, BUT I -- NOT
 6 UNLESS SHE KNEW AND DIDN'T MENTION IT TO ME. IF
 7 SHE NOTICED IT BUT DIDN'T SAY ANYTHING TO ME,
 8 MAYBE. BUT NO, NOT TO MY KNOWLEDGE.
 9 AND SHE -- I MEAN, SHE MIGHT HAVE
 10 KNOWN I WAS DRINKING, YES, BECAUSE I NORMALLY
 11 WOULD BE SAYING, "HEY, GRAB ME A VODKA" OR "GET
 12 ME" -- I WAS DRINKING OPENLY IN FRONT OF EVERYONE.
 13 BUT NO, NOBODY ELSE BESIDES MY
 14 PERSONAL ASSISTANT WOULD HAVE KNOWN I WAS TAKING
 15 VICODIN.
 16 Q. AND SO IF I WERE TO CALL HER IN AND
 17 ASK HER WHETHER SHE ALLOWED YOU TO GO ON, DO
 18 INTERVIEWS, AWARE THAT YOU WERE ON DRUGS OR DRUNK
 19 AT THE TIME, BECAUSE THERE'S A DIFFERENCE IN
 20 HAVING A DRINK AND --
 21 A. RIGHT.
 22 Q. -- BEING DRUNK --
 23 A. RIGHT.
 24 Q. -- YOU WOULD HAVE NO -- YOU DID NOT
 25 SHARE THAT INFORMATION WITH HER?

125

1 YOU ASKED ME ABOUT -- IF I WAS HIGH RIGHT NOW,
 2 WHICH I AM NOT, AND I SAID I'VE BEEN SOBER FOR TWO
 3 MONTHS.
 4 I'VE ACTUALLY ONLY BEEN SOBER OFF
 5 THE PILLS, OFF OF VICODIN. I STILL DRINK. BUT I
 6 WANTED TO MAKE SURE THAT, SINCE I'M UNDER OATH, I
 7 DON'T WANT IT TO COME BACK AND SAY, "YOU -- WE
 8 HEARD -- SOMEBODY SAW YOU DRINKING AND YOU SAID
 9 YOU WERE SOBER FOR TWO MONTHS."
 10 SO MY SOBRIETY HAS ONLY BEEN OFF OF
 11 VICODIN.
 12 Q. OKAY.
 13 A. JUST TO MAKE THAT CLEAR ON THE
 14 RECORD.
 15 MR. BUSCH: OKAY. LET'S PLAY -- IF
 16 YOU COULD PLEASE PLAY TRACK 11. CLIP 11. THANK
 17 YOU.
 18 (WHEREUPON, VIDEO CLIP WAS PLAYED.)
 19 BY MR. BUSCH:
 20 Q. OKAY. SO, MR. THICKE, THAT IS YOUR
 21 VOICE IN THAT INTERVIEW?
 22 A. YES.
 23 Q. YOU DID GIVE THAT INTERVIEW? YOU
 24 DID SAY THOSE WORDS?
 25 A. YES, SIR.

125

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 www.kellinorden.com

CONFIDENTIAL DEPOSITION OF ROBIN THICKE

1 Q. SO I WANT TO DIRECT YOUR ATTENTION
2 TO THE INITIAL QUESTION.
3 A. OKAY.
4 Q. THE QUESTION WAS ASKED OF YOU:
5 "IS THE SONG -- IT
6 FEELS -- BECAUSE SPEAKING OF OLD
7 MAN DANCES AND BARBEQ UE DANCES,
8 IT FEELS SORT OF LIKE 'GOT TO
9 GIVE IT UP,' PART TWO, AND YOU
10 SAID, 'DEFINITELY, YEAH.'
11 DO YOU AGREE THAT "BLURRED LINES"
12 CAN BE ACCURATELY CLASSIFIED AS "GOT TO GIVE IT
13 UP," PART TWO?
14 A. NO.
15 Q. THEN WHY DID YOU SAY "DEFINITELY,
16 YEAH"?
17 A. WELL, THEY TEACH YOU IN THE
18 ENTERTAINMENT AND IN -- AND -- TO -- IN IMPROV TO
19 ALWAYS SAY "YES" AND -- AND MOVE FORWARD AND
20 INSTEAD OF SAYING "NO" TO THINGS.
21 SO IF THEY SAY, "HEY, IT'S
22 EXCITING," IF THEY'RE -- IF THEY'RE GIVING YOU
23 POSITIVITY, YOU ALWAYS GO, "YEAH, OF COURSE, MAN.
24 THAT'S WHAT WE WERE GOING FOR."
25 YOU DON'T STOP -- IT'S -- THAT

126

1 ENTERTAINMENT. IT'S BAD INTERVIEW TO FIGHT AND
2 ARGUE AND DISAGREE.
3 SO IF SOMEBODY LENDS ME A POSITIVE
4 OPENING, I FOLLOW THE POSITIVITY WITH, "YEAH, MAN.
5 THAT'S EXACTLY WHAT WE WERE GOING FOR. ALL THE
6 WAY."
7 Q. ALL RIGHT. SO WHEN -- WHEN YOU
8 AGREED AND SAID "DEFINITELY, YEAH," THAT "BLURRED
9 LINES" WAS --
10 A. YEAH.
11 Q. -- LIKE "GOT TO GIVE IT UP," PART
12 TWO, THAT WAS NOT -- THAT WAS NOT HOW YOU FELT?
13 A. YES. AND I WAS -- AND I WASN'T --
14 AND I WASN'T BEING LITERAL. I WAS -- AFTER SO
15 MANY PEOPLE, AND LIKE THE INTERVIEWERS WERE
16 SAYING, "HEY, MAN, IT REMINDS ME OF THAT SONG. IT
17 REMINDS ME OF THAT ERA," I WAS GOING, "YEAH, MAN.
18 THAT'S WHAT IT IS. IT'S THAT ERA."
19 IT'S -- AND MARVIN GAYE, BEING ONE
20 OF THE GREATEST TO EVER LIVE, SURE, I WANT MY NEW
21 SONG TO BE COMPARED TO MARVIN GAYE. SURE.
22 Q. OKAY. SO THIS WASN'T A REFERENCE
23 TO THE ERA, NOT TO ARGUE WITH YOU.
24 A. NO.
25 Q. IT'S NOT A REFERENCE --

127

1 A. SORRY.
2 Q. THIS IS ACTUALLY SOMEONE --
3 A. SPECIFICALLY --
4 Q. -- SPECIFICALLY --
5 A. -- A RECORD --
6 Q. -- "GOT TO GIVE IT UP" --
7 A. YES.
8 Q. -- PART TWO. AND YOU SAID,
9 "DEFINITELY, YEAH," AND YOU DIDN'T MEAN IT WHEN
10 YOU SAID THAT.
11 A. I DIDN'T -- I DID NOT MEAN THAT,
12 NO.
13 Q. OKAY. AND WHEN YOU WENT ON TO SAY
14 IN THE INTERVIEW THAT YOU TOLD PHARRELL THAT YOU'D
15 LIKE TO:
16 "DO SOMETHING LIKE 'GOT TO
17 GIVE IT UP' AND HE STARTED WITH
18 THE PERCUSSION, YOU KNOW, TRYING
19 TO GET THAT RYTHYM."
20 A. RIGHT.
21 Q. THERE WAS NO INSTANCE WHERE THAT
22 WAS TRUE? THAT WAS NOT TRUE?
23 A. I WASN'T EVEN THERE WHEN HE STARTED
24 IT.
25 Q. OKAY.

128

1 A. SO THAT WAS JUST ME TRYING TO
2 CONTINUE TO TAKE CREDIT LIKE IT WAS ME AND HIM WHO
3 MADE IT TOGETHER.
4 MR. BUSCH: OKAY. GOING TO MOVE TO
5 STRIKE AS NONRESPONSIVE --
6 THE DEPONENT: OKAY.
7 MR. BUSCH: -- AND ASK THE QUESTION
8 AGAIN.
9 THE DEPONENT: I'M SORRY.
10 BY MR. BUSCH:
11 Q. AND MY QUESTION IS: WHEN YOU SAID
12 THAT AFTER REFERENCING "GOT TO GIVE IT UP," THAT
13 PHARRELL:
14 "STARTED TRYING TO GET
15 THAT RYTHYM" --
16 A. YEAH.
17 Q. -- THAT QUOTE, THAT --
18 A. UNTRUE. THAT IS COMPLETELY UNTRUE.
19 Q. OKAY. WAS IT YOUR IDEA TO DECIDE
20 TO ADD A COWBELL TO --
21 A. NO.
22 Q. -- "BLURRED LINES"?
23 OKAY. WAS IT YOUR IDEA TO OMIT THE
24 GUITAR FROM "BLURRED LINES," OR NOT TO HAVE A
25 GUITAR?

129

Kelli Norden and Associates
Court Reporters
510.820.7733 phone 510.820.7933 fax
11833 W. Olympic Boulevard Suite 680E
Los Angeles, California 90064
kna@kellinorden.com www.kellinorden.com

CONFIDENTIAL DEPOSITION OF ROBIN THICKE

1 A. NO.
 2 Q. DID YOU DISCUSS WITH PHARRELL
 3 EITHER OF THOSE TWO THINGS, HAVING A COWBELL, NOT
 4 HAVING A GUITAR?
 5 A. NO.
 6 Q. OKAY. DO YOU EVER INTERNALLY --
 7 HAVE YOU EVER INTERNALLY, WHEN CREATING MUSIC,
 8 EVER THOUGHT OF MARVIN GAYE?
 9 A. NOT WHILE I'M CREATING, NO.
 10 Q. OKAY.
 11 A. WHEN I LISTEN TO HIS MUSIC, I AM
 12 INSPIRED BY HIS GREATNESS.
 13 Q. OKAY.
 14 A. BUT NOBODY ENTERS -- NO OTHER
 15 MUSICIANS OR MUSICALITY ENTERS MY MIND. I HAVE
 16 TOO MUCH OF MY OWN MUSIC IN MY HEAD.
 17 Q. NOW, AFTER THIS LAWSUIT WAS
 18 FILED -- BY YOU, ACTUALLY.
 19 A. UH-HUH.
 20 Q. AFTER YOU FILED THIS LAWSUIT
 21 AGAINST MARVIN GAYE'S CHILDREN --
 22 A. OKAY.
 23 Q. -- YOU GAVE AN INTERVIEW, ALSO
 24 ABOUT "BLURRED LINES" AND MARVIN GAYE.
 25 AND CAN YOU PLEASE PLAY THE CLIP.

130

1 A. OKAY.
 2 Q. AND AFTER THE LAWSUIT WAS FILED,
 3 THE QUESTION WAS ASKED OF YOU:
 4 "SO WHEN YOU -- WHEN YOU
 5 WROTE IT," REFERENCING "BLURRED
 6 LINES," DO YOU THINK OF MARVIN
 7 GAYE, LIKE WHEN YOU WRITE YOUR
 8 MUSIC?"
 9 THE ANSWER WAS "NO."
 10 "QUESTION: ARE YOU A FAN
 11 OF MARVIN GAYE?"
 12 "ANSWER: THE BIGGEST."
 13 A. OKAY.
 14 Q. OKAY? LET'S PLAY THAT. THAT IS
 15 CLIP NUMBER 13.
 16 (WHEREUPON, AUDIO CLIP PLAYED.)
 17 BY MR. BUSCH:
 18 Q. OKAY. ALL RIGHT. SO WHEN YOU
 19 ANSWERED THAT QUESTION AFTER THE LAWSUIT WAS FILED
 20 AND YOU WERE ASKED WHETHER YOU WERE THINKING OF
 21 MARVIN GAYE, YOU ANSWERED "NO."
 22 A. RIGHT.
 23 Q. SO I GUESS MY QUESTION IS: DID YOU
 24 CHANGE YOUR TUNE AT THAT POINT BECAUSE OF THIS
 25 LAWSUIT?

132

1 LET ME MARK THE TRANSCRIPTION AS --
 2 AS A DOC- -- AS AN EXHIBIT.
 3 OH, BEFORE I MARK THE NEXT EXHIBIT,
 4 WAS IT YOUR IDEA TO PUT "HEY, HEY, HEY," THAT
 5 VOCAL LINE, "HEY, HEY, HEY," INTO GROUPS OF THREE?
 6 A. NO, THAT WAS ALL PHARRELL.
 7 Q. OKAY. AND HOW MANY TIMES DO YOU
 8 SING THE GROUPS OF LYRICS "HEY, HEY, HEY" IN THE
 9 SONG?
 10 A. I WOULDN'T BE -- I WOULDN'T KNOW.
 11 Q. OKAY. ALL RIGHT. SO WE'LL MARK
 12 THE T.M.Z. TRANSCRIPT -- TRANSCRIPT FROM
 13 MR. THICKE'S INTERVIEW WITH T.M.Z. AS THE NEXT
 14 EXHIBIT.
 15 WHAT ARE WE UP TO?
 16 DEPOSITION OFFICER: 40. EXHIBIT
 17 40.
 18 (WHEREUPON, DEFENDANTS' EXHIBIT NUMBER
 19 40 WAS MARKED FOR IDENTIFICATION BY
 20 THE DEPOSITION OFFICER AND IS ATTACHED
 21 HERETO.)
 22 BY MR. BUSCH:
 23 Q. 40. AND THEN IF -- I'LL JUST READ
 24 IT FOR THE RECORD. SO IN THE -- THIS WAS AFTER
 25 THE LAWSUIT WAS FILED.

131

1 MR. KING: OBJECTION. OBJECT TO
 2 THE FORM OF THE QUESTION, ARGUMENTATIVE.
 3 BY MR. BUSCH:
 4 Q. GO AHEAD.
 5 A. NO, ACTUALLY, BECAUSE WHAT -- WHAT
 6 SOMEBODY -- SOMEBODY ELSE HAD MENTIONED TO ME
 7 SOMETHING ABOUT THE T.M.Z. THING AND SAID THAT I
 8 SAID SOMETHING LIKE, "WAS MARVIN GAYE IN THE ROOM
 9 WITH YOU WHEN YOU WROTE THIS SONG?"
 10 AND I SAID, "ABSOLUTELY NOT. WE
 11 WERE WRITING ABOUT A WOMAN. HOW CAN WE BE
 12 THINKING OF MARVIN GAYE WHEN WE WERE WRITING A
 13 SONG ABOUT BEAUTIFUL WOMEN?"
 14 Q. THAT -- THAT MIGHT -- MAYBE THAT
 15 WAS A DIFFERENT INTERVIEW --
 16 (SPEAKING SIMULTANEOUSLY.)
 17 THE DEPONENT: OKAY --
 18 BY MR. BUSCH:
 19 Q. -- BUT IN THIS ONE --
 20 A. -- PERTAINING TO HERE, BECAUSE I
 21 DON'T UNDERSTAND THE RELEVANCE OF THAT INTERVIEW.
 22 OR --
 23 Q. OKAY.
 24 A. -- OR THAT QUOTE.
 25 Q. OKAY. THIS IS THE RELEVANCE --

133

Kelli Norden and Associates
 Court Reporters
 310.820.7733 phone 310.820.7933 fax
 11835 W. Olympic Boulevard Suite 660E
 Los Angeles, California 90064
 kna@kellinorden.com www.kellinorden.com

CONFIDENTIAL DEPOSITION OF ROBIN THICKE

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?"
 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 PRESENT IN THE STUDIO, WHEN "BLURRED LINES" WAS
 2 BEING CREATED, BUT YOU WERE DRUNK, ON VICODIN, YOU
 3 WEREN'T ABLE TO PARTICIPATE; IS THAT CORRECT?
 4 MR. KING: OBJECTION; MISSTATES --
 5 THE DEPONENT: YEAH --
 6 MR. KING: -- HIS PRIOR TESTIMONY.
 7 THE DEPONENT: -- THAT'S --
 8 (WHEREUPON, MR. ROBERTS RE-ENTERED THE
 9 DEPOSITION PROCEEDINGS.)
 10 BY MR. BUSCH:
 11 Q. GO AHEAD.
 12 A. YEAH. AND YOU'RE SAYING "UNABLE TO
 13 PARTICIPATE." I OBVIOUSLY SANG THE WHOLE SONG.
 14 Q. MY QUE-- MY -- WHAT -- WHAT YOU
 15 SAID WASN'T --
 16 A. YES.
 17 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 HE
 22 SAID.
 23 MR. BUSCH: WELL, I JUST HEARD
 24 SOMETHING THAT I WASN'T -- THAT SEEMED A BIT
 25 INCONSISTENT A SECOND AGO.

144

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
 6 OTHERS ON YOUR TEAM SUGGEST ANY CHANGES TO
 7 "BLURRED LINES" BEFORE ITS RELEASE IN ANY WAY,
 8 SHAPE OR FORM?
 9 A. NO, SIR.
 10 Q. OKAY. DO YOU BELIEVE "BLURRED
 11 LINES" SOUNDS LIKE BLUEGRASS?
 12 A. I'M NOT FAMILIAR WITH BLUEGRASS
 13 MUSIC VERY -- VERY WELL.
 14 Q. ALL RIGHT. DO YOU KNOW WHAT A
 15 PENTATONIC HARMONY IS?
 16 A. NO, I -- NO, I -- I WOULD TAKE A
 17 GUESS, BUT NO, I DO NOT -- I DO NOT KNOW.
 18 Q. OKAY. THERE ARE SOME NAMES OF SOME
 19 PEOPLE THAT HAVE BEEN REFERENCED IN THIS CASE. I
 20 JUST WANT TO KIND OF UNDERSTAND IF YOU KNOW
 21 WHAT -- WHAT, IF ANY, ROLE THEY HAD IN THE
 22 CREATION OF "BLURRED LINES."
 23 A. OKAY.
 24 Q. BEFORE I DO THAT, HOWEVER, BEFORE
 25 LUNCH, I HEARD YOU TO SAY THAT YOU WERE THERE,

143

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.
 6 Q. -- WERE YOU PRESENT IN THE STUDIO?
 7 A. I WALKED IN WHILE HE WAS ALMOST
 8 FINISHED WITH THE MUSIC. SO IT WOULD -- HE WAS,
 9 I'D SAY -- I'D SAY 75 PERCENT OF IT WAS ALREADY
 10 DONE WHEN I WALKED IN AND HE WAS FINISHING IT AND
 11 GOING "HEY, HEY, HEY" OR SOMETHING LIKE THAT.
 12 LIKE I SAID, I WAS DRUNK. I JUST
 13 KNOW I WALKED IN AND HE ALREADY HAD IT STARTED.
 14 AND THEN IT -- AND THEN IT HAPPENED VERY QUICKLY.
 15 HE WAS WRITING THE LINES LIKE RAPID FIRE.
 16 AND I WAS -- HE WOULD GIVE ME FOUR
 17 LINES. I'D GO IN THE BOOTH, SING IT, WALK OUT OF
 18 THE BOOTH AND HE'D HAVE THE NEXT FOUR LINES, AND
 19 I'D WALK BACK IN, AND THEN HE'D HAVE THE CHORUS
 20 AND I'D WALK BACK IN.
 21 HE -- HE WAS JUST RAPID FIRE.
 22 Q. AND YOU SAID EARLIER HE WAS DOING
 23 THIS ALL ON HIS OWN?
 24 A. YES. THE ONLY PARTS I CAME UP WITH
 25 WAS THE MELODY OF THE SECOND VERSE, "DOO, DOO,

145

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

CONFIDENTIAL DEPOSITION OF ROBIN THICKE

1 Q. OKAY. ALL RIGHT. LET'S CHANGE
 2 SUBJECTS HERE FOR A MOMENT.
 3 A. OKAY.
 4 Q. AND LET'S GO TO THE SONG "LOVE
 5 AFTER WAR" --
 6 A. UH-HUH.
 7 Q. -- AND "AFTER THE DANCE."
 8 HAVE YOU LISTENED TO "LOVE AFTER
 9 WAR" AND "AFTER THE DANCE"?
 10 A. RECENTLY, FOR ANY REASON? NO.
 11 Q. ARE YOU FAMILIAR WITH MARVIN GAYE'S
 12 SONG "AFTER THE DANCE"?
 13 A. YES.
 14 Q. OKAY. HOW ARE YOU FAMILIAR WITH
 15 IT?
 16 A. IT'S A CLASSIC.
 17 Q. HAVE YOU, SINCE THE MATTER WAS
 18 BROUGHT TO YOUR ATTENTION THAT THIS LAWSUIT
 19 INVOLVES THAT SONG --
 20 A. UH-HUH.
 21 Q. -- HAVE YOU LISTENED TO THE TWO
 22 SONGS TO SEE IF YOU BELIEVE THEY CONTAIN ANY
 23 SUBSTANTIALLY SIMILAR MATERIAL?
 24 A. NO, I KNOW THEM BOTH BY HEART. I
 25 COULD PLAY AND SING THEM FOR YOU ON THE PIANO

154

1 Q. AND SO IS HE THE SAME AS YOUR
 2 PERSONAL ASSISTANT IN 2013?
 3 A. YES, SIR.
 4 Q. WHEN YOUR INTERVIEWS WERE DONE?
 5 A. YES.
 6 Q. OKAY.
 7 A. AND HE CAN VERIFY MY PROBLEM VERY
 8 CLEARLY.
 9 Q. WHAT IS HIS ADDRESS?
 10 A. I DON'T HAVE IT UPON ME.
 11 Q. ALL RIGHT.
 12 A. BUT I COULD GIVE YOU HIS PHONE
 13 NUMBER.
 14 Q. WHAT'S HIS PHONE NUMBER?
 15 A. 616 --
 16 Q. UH-HUH.
 17 A. -- 460 --
 18 Q. UH-HUH.
 19 A. -- 0874.
 20 Q. OKAY.
 21 MR. KING: WHY DON'T YOU GIVE THEM
 22 MY PHONE NUMBER?
 23 MR. BUSCH: I GOT YOUR -- I KNOW
 24 HOW TO GET IN TOUCH WITH YOU.
 25 MR. KING: GOOD DEAL. AND ON --

156

1 AND -- AND THERE'S NO SIMILARITIES AT ALL.
 2 Q. OKAY.
 3 A. YOU GUYS DON'T HAVE A CHANCE ON
 4 THAT ONE. THAT'S JUST -- THOSE TWO ARE JUST NOT
 5 EVEN CLOSE.
 6 Q. OH, YOU SAID THAT YOUR PERSONAL
 7 ASSISTANT --
 8 A. YES.
 9 Q. -- GOING BACK TO THE DRUG AND
 10 ALCOHOL --
 11 A. YEAH.
 12 Q. -- AND I APOLOGIZE FOR THAT FOR A
 13 SECOND --
 14 A. NO.
 15 Q. -- BUT I DO NEED TO GO BACK TO
 16 THAT.
 17 A. NO, THAT'S FINE.
 18 Q. YOU SAID THAT YOUR --
 19 A. IT'S ALL IN THE NEW ALBUM.
 20 EVERYONE'S GOING TO KNOW, ANYWAY. YOU GUYS ARE
 21 JUST THE FIRST.
 22 Q. YOU SAID THAT YOUR PERSONAL
 23 ASSISTANT WAS AWARE OF YOUR DRUGS AND YOUR
 24 DRINKING. WHAT IS YOUR PERSONAL ASSISTANT'S NAME?
 25 A. ADAM DAGLOW.

155

1 MR. BUSCH: LET'S --
 2 MR. KING: -- MY PRIVATE LINE.
 3 MR. BUSCH: LET'S GO OFF THE RECORD
 4 FOR FIVE MINUTES, PLEASE.
 5 MR. KING: OKAY.
 6 THE VIDEOGRAPHER: WE'LL GO OFF THE
 7 RECORD AT 3:01 P.M. 3:01.
 8 AND THAT'S OFF.
 9 (WHEREUPON, A RECESS WAS HELD
 10 FROM 3:01 P.M. TO 3:14 P.M.)
 11 (WHEREUPON, THE PROCEEDINGS CONTINUED
 12 WITHOUT THE PRESENCE OF MR. ROBERTS.)
 13 THE VIDEOGRAPHER: AND WE'RE BACK
 14 ON THE VIDEOTAPE RECORD AT 3:14 P.M.
 15 BY MR. BUSCH:
 16 Q. DO YOU KEEP, MR. THICKE, YOUR PRO
 17 TOOLS FILES OR SKETCHES AND REVISIONS?
 18 A. MOST OF THEM. SOMETIMES I RECORD
 19 WITH A DIFFERENT ENGINEER IF I GO TO USE A
 20 DIFFERENT STUDIO, BUT THE MAJORITY OF MY MUSIC IS
 21 RECORDED AT HOME ON MY HOME COMPUTER.
 22 Q. OKAY. WAS IT YOUR IDEA TO FILE
 23 THIS LAWSUIT?
 24 A. NO.
 25 Q. WHOSE IDEA WAS IT?

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 www.kellinorden.com

CONFIDENTIAL DEPOSITION OF ROBIN THICKE

1 **A. MY MANAGER'S AND THE -- AND**
2 **LAWYER'S.**
3 **Q. HAVE YOU EVER SEEN THE -- ANY**
4 **LETTERS WRITTEN TO YOU OR UNIVERSAL RECORDS ABOUT**
5 **THE GAYE FAMILY BELIEVING THAT BLURRED LINES**
6 **COPIED "GOT TO GIVE IT UP"?**
7 **A. I DON'T RECALL SEEING ANY LETTERS**
8 **COME MY WAY PERSONALLY; HOWEVER, ONCE THE LAWSUIT**
9 **STARTED HAPPENING, I MIGHT HAVE SEEN SOMETHING,**
10 **BUT I CANNOT RECALL --**
11 **Q. OKAY.**
12 **A. -- ANY SPECIFIC LETTER THAT HAD TO**
13 **DO WITH THE GAYE FAMILY.**
14 **Q. OKAY. "BLURRED LINES" HAS BEEN**
15 **EXTREMELY COMMERCIAL SUCCESSFUL; CORRECT?**
16 **(THE DEPONENT NODDED.)**
17 **BY MR. BUSCH:**
18 **Q. "YES"?**
19 **A. YEAH.**
20 **Q. IT'S BEEN CERTIFIED SIX TIMES**
21 **PLATINUM BY THE R.I.A.A.?**
22 **A. YES, SIR.**
23 **Q. AND IT'S A NUMBER ONE HIT IN AT**
24 **LEAST 114 COUNTRIES; IS THAT RIGHT?**
25 **A. WOO.**

158

1 **Q. WHO ON YOUR TEAM WOULD I NEED TO**
2 **QUESTION TO UNDERSTAND ALL THE INFORMATION?**
3 **A. THAT WOULD BE -- I HAVE A FEELING**
4 **THAT WOULD GO THROUGH MY BUSINESS MANAGER BECAUSE**
5 **THEY -- THEY KNOW WHERE -- WHERE THE MONEY COMES**
6 **THROUGH. I NORMALLY SEE THE BOTTOM LINE OF THIS**
7 **MONEY CAME IN AND THIS MONEY CAME IN, BUT I DON'T**
8 **KNOW THE SPECIFIC REASON -- REASON THAT CHECK**
9 **CAME.**
10 **DO YOU KNOW WHAT I MEAN?**
11 **Q. I DO.**
12 **A. DOES THAT MAKE SENSE?**
13 **Q. WHO IS YOUR BUSINESS MANAGER?**
14 **A. GREG ROBINSON.**
15 **Q. AND WHAT FIRM IS HE WITH?**
16 **A. I BELIEVE IT'S PERSONAL -- CAN I --**
17 **AM I ALLOWED TO LOOK AT MY PHONE FOR THAT**
18 **INFORMATION?**
19 **MR. KING: YES, IF YOU'D LIKE HIM**
20 **TO LOOK AT YOUR PHONE FOR EVERYTHING. OR YOU**
21 **COULD LEAVE IT IN YOUR POCKET.**
22 **THE DEPONENT: GREG ROBINSON.**
23 **SORRY.**
24 **MR. KING: DIDN'T WE ALREADY GIVE**
25 **THIS IN DISCOVERY? DON'T YOU HAVE THIS?**

160

1 **Q. MAYBE THE GAYES WILL BE SAYING THAT**
2 **ONE DAY.**
3 **MR. KING: IS THAT A QUESTION?**
4 **MR. BUSCH: NO, IT WASN'T.**
5 **BY MR. BUSCH:**
6 **Q. NOW, I ASKED YOU EARLIER YOUR**
7 **KNOWLEDGE PERSONALLY ABOUT ROYALTIES, MECHANICAL**
8 **ROYALTIES AND ANY OTHER RECORD LABEL ROYALTIES,**
9 **ET CETERA.**
10 **A. YES.**
11 **Q. YOU HAVE NO KNOWLEDGE OF THAT?**
12 **A. NO. THE WAY THAT --**
13 **MR. KING: YOU -- YOU -- YOU DON'T**
14 **HAVE TO EXPAND.**
15 **THE DEPONENT: OKAY. SORRY.**
16 **MR. KING: IT'S A "YES" OR "NO" --**
17 **(SPEAKING SIMULTANEOUSLY.)**
18 **THE DEPONENT: WELL, I --**
19 **MR. KING: -- QUESTION.**
20 **THE DEPONENT: I --**
21 **BY MR. BUSCH:**
22 **Q. I DO NEED TO KNOW --**
23 **A. I DO -- I DO NOT HAVE SPECIFIC**
24 **KNOWLEDGE IF I HAVE EVEN RECEIVED A SINGLE DOLLAR**
25 **FROM "BLURRED LINES."**

159

1 **MR. BUSCH: NO.**
2 **THE DEPONENT: ROBINSON & COMPANY.**
3 **BY MR. BUSCH:**
4 **Q. WHAT IS THEIR ADDRESS?**
5 **A. 16 DEANS LANE, D-E-A-N-S, LANE,**
6 **MONMOUTH JUNCTION, MONMOUTH JUNCTION, NEW JERSEY**
7 **08852.**
8 **Q. PHONE NUMBER?**
9 **A. I DON'T HAVE THAT. SORRY. I**
10 **JUST -- I JUST E-MAIL WITH THEM.**
11 **Q. IS "BLURRED LINES" YOUR BIGGEST**
12 **HIT?**
13 **A. YES.**
14 **Q. BY FAR?**
15 **A. YES.**
16 **Q. WHAT IS NUMBER TWO?**
17 **A. THAT WOULD BE "LOST WITHOUT YOU."**
18 **Q. AND HOW MANY RECORDS HAS "LOST**
19 **WITHOUT YOU" SOLD?**
20 **A. I BELIEVE IT SOLD A MILLION COPIES,**
21 **AND THE ALBUM'S AROUND 2 MILLION.**
22 **Q. AND WHAT HAS "BLURRED LINES" SOLD?**
23 **A. "BLURRED LINES" WORLDWIDE IS AT**
24 **12 -- AROUND 12 MILLION, AND THE ALBUM IS MAYBE**
25 **GOLD.**

161

Kelli Norden and Associates
Court Reporters
310.820.7733 phone 310.820.7933 fax
11835 W. Olympic Boulevard Suite 600E
Los Angeles, California 90064
kna@kellinorden.com www.kellinorden.com