UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA

TOM CRUISE,

Plaintiff,

vs.

Case No. CV 12-09124 (DDP) (JCX)

BAUER PUBLISHING COMPANY, L.P., BAUER MAGAZINE L.P., BAUER MEDIA GROUP, INC., BAUER, INC., HEINRICH BAUER NORTH AMERICA, INC., and DOES 1-10, inclusive,

Defendants.

*** CONFIDENTIAL - ATTORNEYS' EYES ONLY ***

VIDEOTAPED DEPOSITION OF TOM CRUISE

September 9, 2013

9:04 a.m.

REPORTED BY:

Jean F. Holliday

CSR No. 4535, RPR, CRR

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APPEARANCES:
                                                                                             INDEX TO CONFIDENTIAL EXHIBITS
                                                                                                   TOM CRUISE
          For the Plaintiff
                                                                                3
                                                                                           Tom Cruise vs. Bauer Publishing Company
            GREENBERG GLUSKER FIELDS CLAMAN MACHTINGER
                                                                                4
                                                                                               Monday, September 9, 2013
            BERTRAM FIELDS
1900 Avenue of the Stars, Suite 2100
Los Angeles, California 90067
                                                                                5
                                                                                          Jean F. Holliday, CSR No. 4535, RPR, CRR
                                                                                6
                                                                                      MARKED
                                                                                                           DESCRIPTION
                                                                                                                                     PAGE
            310.201.7454
                                                                                                     July 23, 2012 letter to Gregory 62
                                                                               8
            310 553/0687 Fax
                                                                                     Exhibit 100
   6
                                                                                                Welch and Dan Wakeford, from
            bfields@greenbergglusker
                                                                                9
                                                                                                Aaron J. Moss; document titled
                                                                                                "Society of Professional
   8
                                                                              10
            GREENBERG GLUSKER FIELDS CLAMAN MACHTINGER
                                                                                                Journalists Code of Ethics", and
                                                                                                a July 26, 2012 letter to Aaron
            AARON L MOSS
            1906 Avenue of the Stars, Suite 2100
                                                                              11
                                                                                                Moss from Gregory A. Welch
            1900 Avenue of the Stars, Sunt
Los Angeles, California 90067
310.5533630
310.2012314 Fax
 10
                                                                                                (Bates Nos. TC000353 - 356)
                                                                              12
 11
            amoss@greenbergglusker.com
                                                                                      Exhibit 101
                                                                                                    E-mail string dated August 8,
 12
                                                                              13
                                                                                                2011
          For the Defendants
                                                                                                (Bates Nos. TC003350 and 3351)
 13
                                                                              14
            DAVISWRIGHT TREMAINE LLP
            ELIZABETH A. McNAMARA
1633 Broadway, 27th Floor
New York, New York 10th 19-6708
                                                                                      Exhibit 102 December 14th, 2012 letter to
                                                                              15
                                                                                                Ms. McNamara from Mr. Fields,
 15
                                                                                                two pages
            212.489.82.70
212.489.8340 Fax
                                                                              16
 16
                                                                                      Exhibit 103 Printous from The Wrap website, 74
            Fzmenamara@dwt.com
                                                                                     14 pages
Exhibit 104 E-mail string dated November 6, 80
 17
                                                                              17
                                                                              18
 18
                                                                                                2012 and August 2, 2013, four
            DAVISWRIGHT TREMAINE LLP
                                                                                     pages
Exhibit 105 C
            DEBORAH ADLER
1633 Broadway, 27th Floor
New York, New Yark 10019-6708
                                                                              19
 19
                                                                              20
                                                                                                     Copy of a New York Post article 85
 20
                                                                                                titled "Tom Rips 'Nazi'
            212.489.8230
212.489.834([Fax
deborahadler@dwt.co
                                                                              21
                                                                                                Diagnosis," dated June 12, 2008,
 21
                                                                                                one page
                                                                              22
 22
          Also Present
                                                                                                Two-page printout from
www.scientology.org titled
                                                                                      Exhibit 106
                                                                                                                                     100
 23
                                                                              23
            GREGORY A WELCH, GENERAL COUNSEL BAUER
PUBLISHING GROUP
STAN BEVERLY, VIDEOGRAPHER
                                                                                                "Scientology. What Does 
'Suppressive Person' Mean"?
 24
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                                                                                      MARKED
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                        WITNESS: TOM CRUISE
                                                                               3
                                                                                      Exhibit 107
                                                                                                     Copy of a cover of Vanity Fair
                                                                                                                                      117
  3
                                                                                                magazine from 2006
                                                                  PAGE
  4
        EXAMINATION
                                                                                     Exhibit 108
                                                                                                08 Chart showing schedules
(Bates Nos. TC002814 - 2833)
                                                                                                                                     131
  5
        By Ms. McNamara:
                                                                                      Exhibit 109 Document titled "Avjet
                                                                                                Corporation Passenger Itinerary
  6
                                                                                                1 January 2011 to 5 July 2012"
(Bates Nos. TC002834 - 2836)
  7
  8
                       INFORMATION REQUESTED
                                                                               8
                                                                                      Exhibit 110 Redacted phone bills
                                                                                                                                   179
  9
                           Page Line
                                                                               9
                                                                                                (Bates Nos. TC002795 - 2800,
10
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                                    15
                                                                                                2791 - 2794, 2801, 2811 - 2813,
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                                                                                                2790, 2808 - 2810, 2805 - 2807,
11
                                                                                                2802 - 2804)
12
                         DOCUMENTS REQUESTED
                                                                              11
                                                                                     Exhibit 111 E-mail string dated July 17,
13
                          Page Line
                                                                                                2012
                                                                              12
114
                                                                                                (Bates No. TC003147)
                             (NONE)
                                                                              13
15
                                                                                     Exhibit 112 Series of e-mails
16
                      WITNESS REFUSED TO ANSWER
                                                                              14
                                                                                                (Bates Nos. TC000835, 836, 936,
                                                                                                937 and 918)
17
                           Page Line
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                                                                                     Exhibit 113 E-mail string dated September
18
                           108
                                     25
                                                                                                15, 2012
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119
                                                                                                (Bates No. TC003140)
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2 (Pages 2 to 5)

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1 LOS ANGELES, CALIFORNIA; 2 MONDAY, SEPTEMBER 9, 2013, 9:04 A.M. 3 TOM CRUISE, 5 having been first duly sworn, was 6 examined and restified as follows: 7 EXAMINATION 9 EXAMINATION 10 THE VIDEOGRAPHER: Good morning. We're on the 11 record. This is the video recorded deposition of Tom 12 Cruise in the matter of Tom Cruise versus Bauer 13 Publishing Company, et al., taken on behalf of the 14 defendant. This deposition is taking place at 1900 15 Avenue of the Stars, Los Angeles, California, on 16 Seprember 9th, 2013, at approximately 9:04 a.m. 17 My name is Stan Beverly. I'm the videographer 18 with U.S. Legal Support located at 11845 West Olympic 19 Boulevard, Los Angeles, California. 10 Video and audio recording will be taking place 20 unless all counsel have agreed to go off the record. 21 Would all present please identify themselves 22 beginning with the witness.	Bob ng like
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22 Would all present please identify themselves 22 A. Sorry about that. You know, Bert can tell 23 beginning with the witness. 23 I don't really	/ou.
23 beginning with the witness. 23 I don't really	ou.
24 THE WITNESS: Tom Cruise. 24 Q. You don't remember any any action that	you
25 MR. FIELDS: And I am Bert Fields, one of the 25 testified in?	
Page 6	ge 8
1 lawyers for Mr. Cruise. 1 A. No. There is a few that I testified in. The	
2 MR. MOSS: Aaron Moss, also for Mr. Cruise. 3 MS. McNAMARA: Elizabeth McNamara for the 3 was a lawsuit that we had I think with Phillips you	
4 defendants, along with my colleague Deborah Adler. 4 ago, and there was a recent case.	ais
5 MR. WELCH: And Greg Welch also for the 5 Q. Involving Mr. Sapir?	
6 defendants. 6 A. Yes, Yes, I think so.	
7 THE VIDEOGRAPHER: The certified court reporter 7 Q. And that testimony occurred last year; is t	nat
8 is Jean Holliday. 8 correct?	rat
9 Would you please swear in the witness. 9 A. We just did it recently, yes.	
10 Q. I want you to if for any reason you don'	
TOM CRUISE, 11 understand one of my questions, I want you to te	
having been first duly sworn, was 12 that you don't understand it.	
13 examined and testified as follows: 13 A. Certainly.	
14 Q. If you don't do so, then we'll assume for the	e
15 EXAMINATION 15 record that you did understand the question.	
16 A. Certainly.	
17 BY MS. McNAMARA: 17 Q. Okay? Did you do anything to prepare fo	this
18 Q. Good morning, Mr. Cruise. 18 deposition?	
19 A. Good morning. 19 A. Met with Bert and Aaron yesterday.	
20 Q. Thank you for coming. It's a standard 20 Q. Okay. For how long?	
21 question, so ·· 21 A. Probably talked about it for about an hour	
22 A. Uh-huh, sure. 22 Q. Okay. Did you look at any documents?	
23 Q dun't take offense, but I need to ask you to 23 A. Just reviewed the covers again of the	
24 begin whether you're taking any medication or anything 24 magazines.	
25 that would impede your ability to speak - 25 Q. Did you review the articles?	
Page 7	ge 9

3 (Pages 6 to 9)

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l		·	
1	the same day as the filing of the joint Rule 26(f)	1	daughter with "Abandoned By Daddy," to me that's what
2	report in this litigation where your lawyer at the last	2	sticks out the most.
3	minute had injected the notion that one of the issues in	3	BY MS. McNAMARA:
4	the litigation would be Bauer's history of bigotry and	4	Q. Okay. And that wouldn't have happened
5	hatred toward minority groups. And we can have this	5	A. Had they not published it.
6	marked as Bauer's Exhibit 103.	6	Q. And if you had not sued. It wouldn't be part
7	(Exhibit 103 marked)	7	of this litigation if your lawyers had not
8	THE WITNESS: Thank you.	8	A. Had they not published it.
9	BY MS. McNAMARA:	9	Q. Let me finish, Mr. Cruise. I understand
10	Q. And before you read that, Mr. Cruise, have you	10	A. You cut me off
11	ever seen this news article before?	11	O. I understand -
12	A. No, I haven't.	12	A. When I was talking earlier you cut me off.
13	Q. Were you aware in any way that your lawyers had	13	Q. Then I apologize. I didn't mean to cut you
14	anything to do with this news article?	14	off.
15	A. No.	15	A. Okay.
16	Do you want me to read the whole thing?	16	Q. So let me
17	Q. You don't have to. I don't want to impede you	17	A. Let me finish, please.
18	if let me ask you one question. Refreshing does	18	Q. Sure. Sure.
19	looking at this article refresh your recollection as to	19	A. "He chose Scientology over Suri for good"
20	the name of the publication that was eluding you	20	"Has he chosen Scientology over Suri for good?
21	earlier, is it "Der Landser"?	21	Abandoned by Daddy." I mean come on, that is absolutely
22	A. I don't know.	22	disgusting. That is absolutely disgusting. And I have
23	Q. Now, are you aware as to whether your counsel	23	to tell you with everything - listen, I am a public
24	had anything to do with the publication of this article?	24	person, I absolutely understand. For nie there is 1
25	A. No.	25	tolerate a tremendous amount and I'm very privileged to
23	Page 74	1	Page 76
	The state of the s		Company to the Company of the Compan
1	Q. You believe that you're not aware or you	1	be able to have the life that I have, and I believe
2	believe they did not?	2	that. But there is a line that that I draw for
3	A. I'm not aware.	3	myself and and that's it. And I asked for an
4	Q. But you can't say that they did not; is that	4	apology. I asked for a retraction. They denied it,
5	right?	5	wouldn't do it, and then published that, you know
6	A. I don't know.	Į.	
		6	this is the second one. I guess, but they published it a
7		7	this is the second one, I guess, but they published it a second time.
7	Q. Would you be troubled if you learned that your	7	second time.
7 8	Q. Would you be troubled if you learned that your counsel provided much of the information that's	7 8	second time. It's very simple. This is something that could
7 8 9	Q. Would you be troubled if you learned that your counsel provided much of the information that's contained in this article?	7 8 9	It's very simple. This is something that could have gotten handled easily. And I understand, listen,
7 8 9	Q. Would you be troubled if you learned that your counsel provided much of the information that's contained in this article? A. 1 would have to	7 8	second time. It's very simple. This is something that could have gotten handled easily. And I understand, listen, with the Internet, with you know, I've been doing
7 8	Q. Would you be troubled if you learned that your counsel provided much of the information that's contained in this article? A. 1 would have to Q. As a means to defend this litigation or to	7 8 9 10	second time. It's very simple. This is something that could have gotten handled easily. And I understand, listen, with the Internet, with you know, I've been doing this for 30 years. I've lived through the whole change
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20 (Pages 74 to 77)

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		,	
1	A. Yes, I do.	1	this as attorneys' eyes only. This document that will
2	Q. And you've contributed a fair amount of money	2	be marked as Exhibit 105 104 I had it right the
3	to them, haven't you?	3	first time, Exhibit 104, that this is a not a
4	A. Yes, I have helped raise money for them.	4	confidential document.
5	Q. And you were awarded the Humanitarian Award in	5	(Exhibit 104 marked)
6	May 2011 from the center?	6	BY MS, McNAMARA:
7	A. Yes.	7	Q. I don't know whether you can read German. I
8	Q. Did you have anything to do with the center's	8	can't read German, so you can skip to the English part
9	investigation of Bauer?	9	of this e-mail.
10	A. No, I didn't.	10	A. Okay,
1		1	
11	Q. Did you ask them to	11	Q. Is this the first time you've seen this e-mail, Mr. Cruise?
- 1	A. No	į.	
13	Q investigate?	13	A. Yes.
14	A I didu't.	14	Q. Did you authorize Mr. Galsor to reach out to
15	Q. Do you know whether your lawyers had anything	15	the media and to supply them with a lot of largely false
16	to do with the investigation	16	information concerning Bauer?
17	A. I don't know.	17	A. No.
18	Q by the center of Bauer?	18	Q. And to seek publicity concerning them?
19	A. No, I don't know.	19	MR. FIELDS: Object to the form of the
20	Q. So it was just a coincidence?	20	question. I'm sorry.
21	A. I don't know.	21	You may answer.
22	Q. Do you know whether — let me step back.	22	THE WITNESS: No, I didn't. So Bauer isn't the
23	Have you personally tried to generate press	23	biggest pornographer in Germany?
24	concerning Bauer being pro-Nazi?	24	BY MS, McNAMARA:
25	A. No. Page 78	25	Q. No.
2 3	Q. Have you spoken to any press organization concerning your belief that the Bauer Pub you know, the Bauer Corporation	2	A. There is a bigger one? Q. Welf, like for example, it says: It's likely
4 5	A. No, I haven't. O is pro-Nazi?	3 4 5	that concentration camp labor was used to publish these weekly magazines, but we have not uncovered any evidenc to support that. If we publish that, you could sue us
5	Q is pro-Nazi?	4	weekly magazines, but we have not uncovered any evidence to support that. If we publish that, you could sue us
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5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22	Q is pro-Nazi? A. No, I haven't. Q. That it's anti-Semitic? A. I have not. Q. Do you know have you authorized your your counsel to generate such publicity? A. No. Q. Are you aware let me ask you this: Who is Matt Galsor? A. Matt Galsor, he's my lawyer. Q. And he's a lawyer at this firm; is that right? A. Yes. Q. Are you aware that he e-mailed an AP reporter suggesting that they publish a story about Bauer's pro-Nazi sentiment? A. No. Q. Did you authorize such an effort? A. No.	4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22	weekly magazines, but we have not uncovered any evidence to support that. If we publish that, you could sue us for actual malice. It's an admission of falsehood. Do you see that, Mr. Cruise? A. I beg your pardon, this is what? Q. If we if In Touch published, or if the magazine published that Bauer used concentration camp labor to publish its weekly magazines and at the same time admitting that they have not uncovered any evidence to support that contention, you understand that that would state a claim for defamation, do you? MR. FIELDS: Objection to the form of the question. It asks for improper opinion. You may answer. THE WITNESS: I'm not a lawyer. BY MS. McNAMARA: Q. You can answer. A. I'm not a lawyer. Q. Okay.

21 (Pages 78 to 81)

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1	year Bauer has distributed ultra-radical racist and	1	BY MS. McNAMARA:
2	anti-Semitic magazines from neo-Nazi publisher?	2	Q. Okay.
3	Q. No. But I'm not here to testify.	3	A. That's what I wanted. I wanted an apology.
4	A. That Bauer's that Bauer's that Bauer's	4	They didn't do it, and then they did it again. Is that
5	company didn't do that.	5	ethical? Is that ethical?
6	Q. I'm not here to testify, Mr. Cruise.	6	MR. FIELDS: You don't get to ask questions.
7	A. Well, I'm just	7	THE WITNESS: Okay. Sorry.
8	Q. My question	8	MS. McNAMARA: Thank you, Mr. Fields.
وا	A curious because you said that	9	Q. Now seeing this e-mail from your lawyer,
10	Q. My question to you is did you authorize this	10	Mr. Galsor, series of e-mails actually, do you now
11	press efforts by your counsel?	11	believe that maybe lie liad something to do with the Sim
12	A. No. No, I didn't. No, I didn't.	12	Wiesenthal Center investigation?
13	Q. And you were not aware of it; is that right?	13	A. I don't know.
14	A. No, I wasn't.	14	Q. Or The Wrap article?
15	Q. And if you compare, and I you can I'm not	15	A. I don't know.
16	asking you necessarily to do, but if you compare many of	1	MS. McNAMARA: We call for the production of
17	the contentions in this e-mail with The Wrap article,	17	all documents evidencing contact with the press
1	many of the exact same facts are included. Does that	18	
18	·		regarding Bauer and Naziism and anti-Semitism.
19	help to inform whether your counsel were also	19	Q. That's not for you, Mr. Cruise.
20	responsible for the content of The Wrap article?	20	A. I was like okay, what does that mean?
21	MR. FIELDS: Objection to the form.	21	Q. That's that's for your counsel that we're
22	You may answer.	22	calling for the production of all those documents.
23	THE WITNESS: I mean I don't know if they were	23	And reacting to negative press by insinuating
24	or not. I didn't authorize it.	24	an association with Naziism, this isn't the first time
25	///	25	that you've done this; is that right?
	Page 82		Page 8
1	BY MS. McNAMARA:	1	A. What do you mean?
2	Q. Do you believe such tactics like this after you	2	Q. That either you or representatives on your
	file a defamation lawsuit and then you seek to gin up		
3	the a detaination lawsuit and their you seek to girl up	3	behalf when you've when someone has been neg
3	press around the world about the company that has	3	behalf when you've when someone has been neg attacked you negatively in the press in some manner, the
		1	
4	press around the world about the company that has	4	attacked you negatively in the press in some manner, the
4 5	press around the world about the company that has nothing to do with the content or the issues in the	4 5	attacked you negatively in the press in some manner, the reaction is to accuse them of being pro-Nazi or
5	press around the world about the company that has nothing to do with the content or the issues in the litigation, do you believe that's ethical?	5	attacked you negatively in the press in some manner, the reaction is to accuse themof being pro-Nazi or anti-Semitie or anti-religion?
4 5 6 7	press around the world about the company that has nothing to do with the content or the issues in the litigation, do you believe that's ethical? MR. FIELDS: Object to the form of the	4 5 6 7	attacked you negatively in the press in some manner, the reaction is to accuse themof being pro-Nazi or anti-Semitic or anti-religion? A. 1 don't know.
4 5 6 7 8	press around the world about the company that has nothing to do with the content or the issues in the litigation, do you believe that's ethical? MR. FIELDS: Object to the form of the question. Asks for improper opinion.	4 5 6 7 8	attacked you negatively in the press in some manner, the reaction is to accuse themof being pro-Nazi or anti-Semitic or anti-religion? A. I don't know. Q. Have you ever
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4 5 6 7 8 9 10 11 12 13	press around the world about the company that has nothing to do with the content or the issues in the litigation, do you believe that's ethical? MR. FIELDS: Object to the form of the question. Asks for improper opinion. You may answer. BY MS. McNAMARA: Q. You may answer. A. Listen, I think it's you have to look at something is it true or is it not true, and I listen,	4 5 6 7 8 9 10 11 12	attacked you negatively in the press in some manner, the reaction is to accuse themof being pro-Nazi or anti-Semitic or anti-religion? A. 1 don't know. Q. Have you ever A. Depends on the Q heard that before? A. Depends on the situation. Q. Do you recall a statement by Dr. Drew Pinsky concerning you?
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4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23	press around the world about the company that has nothing to do with the content or the issues in the litigation, do you believe that's ethical? MR. FIELDS: Object to the form of the question. Asks for improper opinion. You may answer. BY MS. McNAMARA: Q. You may answer. A. Listen, I think it's you have to look at something is it true or is it not true, and I listen, I didn't authorize it. Q. Setting aside the truth of this content, do you believe that that's a proper litigation tactic? MR. FIELDS: Same objection. But you may answer. THE WITNESS: A proper litigation tactic or not. The one thing that all I wanted basically was for them not to print that I abandoned my daughter and that I chose my religion over my daughter, that's what I	15 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23	attacked you negatively in the press in some manner, the reaction is to accuse themof being pro-Nazi or anti-Semitie or anti-religion? A. 1 don't know. Q. Have you ever A. Depends on the Q heard that before? A. Depends on the situation. Q. Do you recall a statement by Dr. Drew Pinsky concerning you? A. No. Q. Let me show you we'll mark this as defendants' Exhibit 105 or it's not defendants'. It's Exhibit 105. (Exhibit 105 marked) MS. McNAMARA: Off the record. I can't get used to that We always separated exhibits. THE VIDEOGRAPHER: The time is approximate! 10:51 a.m. MS. McNAMARA: No, we're not off the record.
4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22	press around the world about the company that has nothing to do with the content or the issues in the litigation, do you believe that's ethical? MR. FIELDS: Object to the form of the question. Asks for improper opinion. You may answer. BY MS. MeNAMARA: Q. You may answer. A. Listen, I think it's you have to look at something is it true or is it not true, and I listen, I didn't authorize it. Q. Setting aside the truth of this content, do you believe that that's a proper litigation tactic? MR. FIELDS: Same objection. But you may answer. THE WITNESS: A proper litigation tactic. I don't know if it is a proper litigation tactic or not. The one thing that all I wanted basically was for them not to print that I abandoned my daughter and that	4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22	attacked you negatively in the press in some manner, the reaction is to accuse themof being pro-Nazi or anti-Semitie or anti-religion? A. 1 don't know. Q. Have you ever A. Depends on the Q heard that before? A. Depends on the situation. Q. Do you recall a statement by Dr. Drew Pinsky concerning you? A. No. Q. Let me show you we'll mark this as defendants' Exhibit 105 or it's not defendants'. It's Exhibit 105 marked) MS. McNAMARA; Off the record. I can't get used to that We always separated exhibits. THE VIDEOGRAPHER: The time is approximate! 10:51 am.

22 (Pages 82 to 85)

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2 claim letter saying: You should retract this, you need to to-you know, we're threatening to sue. 4 A. Uh-hub. 5 Q. It is short of lawsuit. Okay? 6 A. Yes. 6 A. Yes. 7 Q. So with that understanding as — as to asserting a claim:— 9 A. Yes. 10 Q. — do you recall that your lawyers have 11 asserted claims cencerning coverage about Suri prior 12 to-12 to-13 A. Yes. 11 A. Yes. 12 Q. — do you recall that your lawyers have 12 A. Yes. 13 A. Yes. 14 Q. — the— 14 Q. — the— 15 A. Yes. 15 A. Yes. 16 Q. — articles — 16 A. Yes. 17 A. Yes. Thank you. 18 Q. — articles — 16 A. Yes. 19 A. Yes, Ido. Yes. 19 A. Yes, Ido. Yes. 20 Q. And one of them was about secret auditing of 21 Suri. Do you recall that? 21 A. I don't know. I'd have to look at it. 22 A. I don't recall all those. 23 Q. Or that Suri was kept in a windowless room at one of your homes? 24 A. I don't know the for 12 hours on July 26, or approximately thereof. Do you recall than? 25 A. I don't recall all those. 26 Q. Or that Suri was kept in a windowless room at one of your homes? 27 A. I don't kink as in letter's sent do you approve the claim letter? 28 A. No, not all of them. 29 Q. Doy or read the applicable articles that are being challeuged? 30 A. No, not all of them. 31 A. No, not all of them. 32 Q. And again, I think you cestified to this, and I approximately when you came to New York and picked up Suri was been fell of this, and I approximately when you came to New York and picked up Suri was you got prieded on at, that by Armanda Landberg? A. By Armanda or if it's a legal thing I'l call and you took her to Disacy World? 3 A. Where she filed divorce. 3 Q. And spain, I think you testified to this, and I ayou and your wife separated; is that right, Kait 3 you and your wife separated; is that right, Kait 4 Think you came to you above the were living on A. Yes, Ido. Q. Ow, Now, Sur and you took her to Disacy World? 4 A. Yes, Ido. Q. Ow, You saw here for 12 hours on July 26, or approximately when you came to New York and picked up Suri and you took her to Disacy World					
2 claim letter saying. You should retract this, you need 3 to — you know, we're threatening to sue. 4 A. Uh-huh. 5 Q. It's short of lawsuit. Okay? 5 A. Yes. 7 Q. So with that undestanding as — as to asserting a claim — 9 A. Yes. 10 Q. — do you recall that your lawyers have 11 asserted claims concerning coverage about Suri prior 12 to — 13 A. Yes. 14 Q. — the— 15 A. Yes. 15 Q. — articles — 16 Q. — articles — 17 A. Yes. 18 Q. — the— 19 A. Yes. 19 Q. — the— 10 Q. — the— 10 Q. — the— 11 A. Yes. 11 A. I don't know the total number of days. 12 Q. Does that sound right? 13 A. Yes. 14 Q. — the— 15 A. Yes. 15 Q. — articles — 16 Q. — articles — 17 A. Yes. Thank you. 17 A. Yes, Ido. Yes. 18 Q. — articles — 19 A. Yes, Ido. Yes. 20 Q. And one of them was about secret auditing of 20 Q. Xay. You saw her for 12 hours on July 26, or approximately thereof. Do you recall that? 21 A. I don't know the total number of days. 22 A. I don't recall all of them, no. 23 Q. Ortan you were creating a, wedge between Knite 2 and Surt? 24 A. I don't recall all of them, no. 25 A. I don't recall all of them, no. 26 Q. Ortan you were creating a, wedge between Knite 2 one of your homes? 27 A. I don't recall all of them, no. 28 Q. Ortan you were creating a, wedge between Knite 2 one of your homes? 29 Q. And one of them was about secret auditing of 2 one of your about secret auditing of 2 one of your homes? 3 A. I remember stuff when Suri was born, I do. If don't know if it was specifically that, but I do recall some of your shares? 4 A. R. It was kept in a windowless room at one of your shares? 4 A. A. I get briefed on it, that shy Amanda Landberg? 4 A. A. I get briefed on it, that shy Amanda Landberg? 4 A. A. I get briefed on it, that shy Amanda Landberg? 4 A. A. Pan A. A. A. I get briefed on it, that shy Amanda Landberg? 4 A. Yes. 4 A. Yes. A. O. Yes. And that was at the end of June 2012? 5 A. A. Yes. And that was at the end of June 2012? 5 A. Yes. And that was at the end of June 2012? 5 A. Yes. And that was at the end of June 2012? 5 A. Yes. And	1	When I say "asserting a claim" I mean sending a	1	right?	
3 to - you know, where threatening to sue. 4 A. Uh-huh. 5 Q. If sistort of lawsuit. Okay? 5 Q. So with that understanding as as to 8 asserting a claim 9 A. Yes. 10 Q do you recall that your lawyers have 11 asserted claims concerning coverage about Suri prior 12 to 13 A. Yes. 14 Q the 15 A. Yes. 15 A. Yes. 16 Q articles 16 Q articles 17 A. Yes. 17 A. Yes. 18 Q articles 19 A. Yes. 19 A. Yes. 10 Q articles 10 Q articles 11 A. Yes. 11 A. Ison throw the total number of days. 12 Q articles 13 A. Yes. 15 Q and the three days of July 17th to the 16 Q articles 17 A. Yes. 18 Q artisles 18 Q artisles 19 A. Yes. 10 Q artisles 10 Q artisles 11 A. Yes. 11 A. Yes. 12 Yes. 13 A. I don't know. I'd have to book at at. 14 Q. They were the three days of July 17th to the 15 A. Yes. 16 Q artisles 17 A. Yes., I do. Yes. 18 Q. Cartisles 19 A. Yes., I do. Yes. 19 A. Yes., I do. Yes. 20 Q. And one of them was about secret auditing of 20 Q. They were the three days of July 17th to the 21 Suri. Do you recall that? 22 A. I don't recall all those. 23 Q. Or that you were creating a wedge between Katie and Suri? 24 A. I don't recall all those. 25 A. I don't recall all those. 26 Q. Forthal Suri was kept in a windowless room at one of your homes? 3 A. I remember stuff when Suri was born, I do. I don't know if it was specifically that, but I do recall some of those kinds of statements. 26 Q. Before a claim letter is sent do you approve the claim letter? 3 A. No, not all of them. 3 Q. Doyou have any reason to dispute that ebeing challenged? 4 A. Q. Doyou have any reason to dispute that ebeing challenged? 5 A. Ryandand or if it as legal thin gift lead to this, and I applicable articles that are being challenged? 5 A. Ryandand or if it as legal thin gift lead to this, and I applicable for the content of June 2012? 4 A. Where she filed divorce. 4 A. Where she filed divorce. 5 Q. And since the divorce or ratter since prior to that time, from	2		2	A. Yes.	
4 this Higation that includes your schedule and travet— Q. Mes short of lawsuit. Okay? A. Yes. Q. So with that understanding as — as to asserting a claim — A. Yes. 10 Q. —do you recall that your lawyers have 11 asserted claims concerning coverage about Suri prior to — 12 to — 13 A. Yes. 14 Q. —the — 15 A. Yes. 16 Q. —articles — 17 A. Yes. 18 Q. —articles — 19 A. Yes, Ido, Yes. 10 Q. —articles — 11 A. Yes, Ido, Yes, Id	3		3	Q. I think your counsel have produced documents in	
6 A. Yes. 7 Q. So with that understanding as — as to 8 asserting a claim — 9 A. Yes. 10 Qdo your recall that your lawyers have 11 asserted claims concerning coverage about Suri prior 12 to — 13 A. Yes. 14 Qthe — 15 A. Yes. 15 A. Yes. 16 Qarticles — 17 A. Yes. Thank you. 18 Qart issue in this fligation? 19 A. Yes, Idon. Yes. 19 Q. And one of them was about secret auditing of 21 Suri. Do you recall flat? 22 A. I don't recall all those. 24 A one of your homes? 3 A. I don't recall all those. 25 Q. And one of them was kept in a windowless room at one of your homes? 4 A. Non. one all of them. 5 Q. Before a claim letter is sent do you approve the claim letter? 5 A. No, not all of them. 9 Q. Does that sound right? 10 A. I don't know the total number of days. 11 A. I don't know the total number of days. 12 Q. They were the three days of July 17th to the 19th, when you came into New York, and then you went out to the Hamptons. Do you recall than? 13 A. Yes, Ido. 24 Q. Kay, You saw her for 12 hours on July 26, or approximately thereof. Do you recall than? You were flying from London to L.A. and you stopped in New York for — 19 A. I don't recall all those. 20 Q. And one of them was about secret auditing of 18 and Suri? 21 Q. Orthat you were creating a wedge between Katie and Suri? 22 A. I don't recall all of them, no. 23 Q. Orthat you were creating a wedge between Katie and Suri? 24 A. Ves. 25 Q. And one of them was kept in a windowless room at one of your homes? 26 A. I don't recall all those. 27 A. I don't recall all those. 28 A. I don't recall all those. 29 A. A. I don't recall than tree in the province of your power the claim letter? 30 A. A. I remember stuff when Suri was born, I do. I don't know the total number of days. 31 A. I don't know the total number of days. 32 A. O'ves, Idon. 34 Yes, Idon. 35 A. Yes, Idon. 36 Q. O'ves, Idon. 36 Q. O'ves, Idon. 37 Q. O'ves that sound right? 38 A. No, not all of them. 39 Q. Do you recall than? 30 Q. O'that you were creating a wedge between Katie and Suri? 30 Q. O've	4	_	4	this litigation that includes your schedule and	
6 A. Yes. 7 Q. So with that understanding as — as to 8 asserting a claim — 9 A. Yes. 10 Qdo your recall that your lawyers have 11 asserted claims concerning coverage about Suri prior 12 to — 13 A. Yes. 14 Qthe — 15 A. Yes. 15 A. Yes. 16 Qarticles — 17 A. Yes. Thank you. 18 Qart issue in this fligation? 19 A. Yes, Idon. Yes. 19 Q. And one of them was about secret auditing of 21 Suri. Do you recall flat? 22 A. I don't recall all those. 24 A one of your homes? 3 A. I don't recall all those. 25 Q. And one of them was kept in a windowless room at one of your homes? 4 A. Non. one all of them. 5 Q. Before a claim letter is sent do you approve the claim letter? 5 A. No, not all of them. 9 Q. Does that sound right? 10 A. I don't know the total number of days. 11 A. I don't know the total number of days. 12 Q. They were the three days of July 17th to the 19th, when you came into New York, and then you went out to the Hamptons. Do you recall than? 13 A. Yes, Ido. 24 Q. Kay, You saw her for 12 hours on July 26, or approximately thereof. Do you recall than? You were flying from London to L.A. and you stopped in New York for — 19 A. I don't recall all those. 20 Q. And one of them was about secret auditing of 18 and Suri? 21 Q. Orthat you were creating a wedge between Katie and Suri? 22 A. I don't recall all of them, no. 23 Q. Orthat you were creating a wedge between Katie and Suri? 24 A. Ves. 25 Q. And one of them was kept in a windowless room at one of your homes? 26 A. I don't recall all those. 27 A. I don't recall all those. 28 A. I don't recall all those. 29 A. A. I don't recall than tree in the province of your power the claim letter? 30 A. A. I remember stuff when Suri was born, I do. I don't know the total number of days. 31 A. I don't know the total number of days. 32 A. O'ves, Idon. 34 Yes, Idon. 35 A. Yes, Idon. 36 Q. O'ves, Idon. 36 Q. O'ves, Idon. 37 Q. O'ves that sound right? 38 A. No, not all of them. 39 Q. Do you recall than? 30 Q. O'that you were creating a wedge between Katie and Suri? 30 Q. O've	5	Q. It's short of lawsuit. Okav?	5		
8 asserting a claim 10 Qdo you recall that your lawyers have 11 asserted claims concerning coverage about Suri prior 12 to 13 A. Yes. 14 Qthe 15 A. Yes. 15 A. Yes. 16 Qarticles 17 A. Yes. Thank you. 18 Qarticles 19 A. Yes, 1 do. 19 Qarticles 10 Qarticles 11 A. Yes, 1 do. 19 Qarticles 10 Qarticles 11 A. Yes, 1 do. 10 Qarticles 11 A. Yes, 1 do. 11 A. Yes, 1 do. 12 Q. They were the firete days of July 17th to the 19 A. Yes, 1 do. 19 Qarticles 10 Q. And one of them was about secret auditing of 19 Suri. Do you recall that? 10 Q. Okay. You saw her for 12 hours on July 26, or 19 approximately thereof. Do you recall that? 10 Q. Okay. You saw her for 12 hours on July 26, or 19 approximately thereof. Do you recall that? You were 19 flying from London to L.A. and you stopped in New York 10 Q. A. Yes. 21 Q. Ard and recall all of them, no. 22 A. Yes. 23 Q. And then tree all all of them, no. 24 A. Yes. 25 Q. And then tree all all of them, no. 26 Q. Even were creating a wedge between Katie 27 and Sur? 28 A. I don't recall all of them, no. 29 Q. Do, You that you were creating a wedge between Katie 29 and Sur? 20 Q. And then tree all all of them, no. 21 Q. Or that you were creating a wedge between Katie 29 A. I remember stuff when Suri was born, I do. I 20 don't know if it was specifically that, but I do recall 21 some of your homes? 22 A. Opo you read the applicable articles that are 23 being challenged? 24 A. No, not all of them. 25 Q. On you read the applicable articles that are 26 being challenged? 27 A. Suri and you took her to Disuey World? 28 A. Okay. 29 Q. Do you have any reason to dispute that 29 Q. And again, I think you treath cunher you 20 Q. And again, I think you treath chins, and I approximately, when you came to New York and picked up 29 A. Yes, Ido. 20 Q. And again, I think you treath chins, and I approximately when you came to New York and picked up 20 Do you have any reason to dispute that 21 dependent of the price of the price of the pr	6		6	A. Yes.	
8 asserting a claim 10 Qdo you recall that your lawyers have 11 asserted claims concerning coverage about Suri prior 12 to 13 A. Yes. 14 Qthe 15 A. Yes. 15 A. Yes. 16 Qarticles 17 A. Yes. Thank you. 18 Qarticles 19 A. Yes, 1 do. 19 Qarticles 10 Qarticles 11 A. Yes, 1 do. 19 Qarticles 10 Qarticles 11 A. Yes, 1 do. 10 Qarticles 11 A. Yes, 1 do. 11 A. Yes, 1 do. 12 Q. They were the firete days of July 17th to the 19 A. Yes, 1 do. 19 Qarticles 10 Q. And one of them was about secret auditing of 19 Suri. Do you recall that? 10 Q. Okay. You saw her for 12 hours on July 26, or 19 approximately thereof. Do you recall that? 10 Q. Okay. You saw her for 12 hours on July 26, or 19 approximately thereof. Do you recall that? You were 19 flying from London to L.A. and you stopped in New York 10 Q. A. Yes. 21 Q. Ard and recall all of them, no. 22 A. Yes. 23 Q. And then tree all all of them, no. 24 A. Yes. 25 Q. And then tree all all of them, no. 26 Q. Even were creating a wedge between Katie 27 and Sur? 28 A. I don't recall all of them, no. 29 Q. Do, You that you were creating a wedge between Katie 29 and Sur? 20 Q. And then tree all all of them, no. 21 Q. Or that you were creating a wedge between Katie 29 A. I remember stuff when Suri was born, I do. I 20 don't know if it was specifically that, but I do recall 21 some of your homes? 22 A. Opo you read the applicable articles that are 23 being challenged? 24 A. No, not all of them. 25 Q. On you read the applicable articles that are 26 being challenged? 27 A. Suri and you took her to Disuey World? 28 A. Okay. 29 Q. Do you have any reason to dispute that 29 Q. And again, I think you treath cunher you 20 Q. And again, I think you treath chins, and I approximately, when you came to New York and picked up 29 A. Yes, Ido. 20 Q. And again, I think you treath chins, and I approximately when you came to New York and picked up 20 Do you have any reason to dispute that 21 dependent of the price of the price of the pr	7		7	O and the like. And according to those	-
9 until Thanksgiving of 2012, you saw your daughter for 10 days. 10 Q. —do you recall that your lawyers have 11 asserted claims concerning coverage about Suri prior to to to the Tampons. Do you feel there days of July 17th to the 12 to — 13 A. Yes. 14 Q. —the — 15 A. Yes. 15 19th, when you came into New York, and then you went out to to the Tampons. Do you recall that? 17 A. Yes. Thank you. 18 Q. —at issue in this litigation? 19 A. Yes, I do. Yes. 20 Q. And one of them was about secret auditing of Suri. Do you recall that? 21 A. I don't recall all of them, no. 22 Q. Or that you were creating a wedge between Katie and Suri? 23 A. I don't recall all those. 24 A. I don't recall all those. 25 A. I don't recall all those. 26 Q. Or that Suri was kept in a windowless room at one of your homes? 27 A. I don't was specifically that, but I do recall some of Home with the suri was born, I do. I don't know if it was specifically that, but I do recall some of Home and I and the policible articles that are being challenged? 28 A. No, not all of them. 29 Q. Do you read the applicable articles that are being challenged? 30 A. Tenember stuff when Suri was born, I do. I don't know it it was specifically that, but I do recall some of Home you go you prove the claim letter? 30 A. Tenember stuff when Suri was born, I do. I don't know it it was specifically that, but I do recall some of Home you have any reason to dispute that calculation? 31 A. Jeon't know. I'd was don't know it it was pecifically that, but I do recall some of Home you have any reason to dispute that calculation? 31 A. Jeon't know. I'd was don't know. I'd was done to look at it. 32 A. Yes. 33 A. I don't know. I'd have to look at it. 44 Q. Do you recall that? 45 A. Yes, I do. 46 A. Yes, I do. 50 A. A Yes, I do. 51 A.	8		8		
10 asserted claims concerning coverage about Suri prior 1 11 asserted claims concerning coverage about Suri prior 1 12 to 13 A. Yes. 1 14 Qthe 14 Q. They were the three days of July 17th to the 1 15 A. Yes. 15 Q articles 16 Q articles 17 A. Yes. Thank you. 17 A. Yes. I do. Q. They were the three days of July 17th to the 19th, when you came into New York, and then you went out 16 to the Hamptons. Do you recall that? You were 19th of 20 Q. And one of them was about secret auditing of 21 Suri. Do you recall that? You were 19th of 21 Suri. Do you recall that? You were 19th of 22 Q. And one of them was about secret auditing of 21 Suri. Do you recall that? You were 19th of 22 Q. And that you were creating a wedge between Katic 24 and Suri? 23 Q. Or that you were creating a wedge between Katic 24 and Suri? 24 Q. Or that you were creating a wedge between Katic 24 one of your homes? 25 Q. And then there alm letter is sent do you approve 19 Q. Or that Suri was kept in a windowless room at 2 one of your homes? 26 Q. Before a claim letter is sent do you approve 27 the claim letter is sent do you approve 28 Q. Do you recall that? 29 Q. Do you	1	-	9	1	
asserted claims concerning coverage about Suri prior to t	10	O do you recall that your lawyers have	10		77,000
12 to 13 A. Yes. 14 Q the 15 A. Yes. 15 A. Yes. 16 Q articles 17 A. Yes. Thank you. 18 Q at issue in this litigation? 19 A. Yes, I do. Yes. 20 Q. And one of them was about secret auditing of 21 Suri. Do you recall than? 21 A. I don't recall all of them, no. 22 A. I don't recall all of them, no. 23 Q. Or that you were creating a wedge between Katic 24 and Suri? 25 A. I don't recall all those. 26 Page 94 1 Q. Or that Suri was kept in a windowless room at 22 one of your homes? 3 A. I remember stuff when Suri was bont, I do. I don't know if it was specifically that, but I do recall some of those kinds of statements. 4 Q. Do you read the applicable articles that are being challeuged? 5 A. No, not all of them. 9 Q. Do you read the applicable articles that are being challeuged? 1 A. I get briefed on them or I read them, yes. Q. And again, I think you testified to this, and I apologized if I'm asking you to repeat it, but when you say you get briefed on it, that's by Amanda Lundberg? A. By Almanda or if it's a legal thing I'll call berry ou and your wrife separated, is that right, Katie I lolmes? Q. A. Where she filed divorce. Q. Yes. And that was at the end of June 2012? A. Yes. Q. And sugain, think you coursel. Q. Or kay. Now, there came a time, Mr. Cruise, that you and your wrife separated; is that right, Katie I lolmes? Q. A. Where she filed divorce or ratter since prior to that time, from June 18th of 2012 until Thanksgiving of 2012, you only saw Suri a few times; isnt that Q. O. And signification in the more; in the other sisters don't you have three sisters? A. A. Tree sisters. Q. O. Du by they dil tive in Los Angeles?	ì		1	-	
13 A. I don't know. I'd have to look at it. 14 Q the 15 A. Yes. 16 Q articles 17 A. Yes. Thank you. 18 Q art issue in this fitigation? 19 A. Yes, I'do. Yes. 20 Q. And one of them was about secret auditing of 21 Suri. Do you recall that? 21 Suri. Do you recall that? 22 A. I don't recall all of them, no. 23 Q. Or that you were creating a wedge between Katic and Suri? 25 A. I don't recall all those. 26 Page 94 1 Q. Or that Suri was kept in a windowless room at 2 one of your homes? 27 A. I don't know if it was specifically that, but I do recall 3 some of those kinds of statements. 28 Q. Before a claim letter's sent do you approve the claim letter's sent do you approve the claim letter's sent do you approve the claim letter's and gain, I think you testified to this, and 1 apologize if I'm asking yuit to repeat it, but when you say you get briefed on it, that's by Amanda Lundberg? 29 A. By Amanda or if it's a legal thing I'll call being challenged? 30 A. Where she filed divorce. 31 Q. Oxad. Now, there came a time, Mt. Cruise, that you and your wife separated; is that right, Katie 14 Homes? 32 Q. And sain created; is that right, Katie 15 Holms? 33 A. I don't know. I'd have the time New York, and then you were the three days of Do, Vay. Now, there came a time, Mt. Cruise, that you and you rwife separated; is that right, Katie 16 Holms? 34 A. Yes. 35 Q. And was she close with your other children, Connor and 1 slabella? 36 A. Okay. 37 A. I don't know. I'd have to look at the time New York, and then you were the total thin. New York and pour wife separated; is that right, Katie 16 Holms? 36 A. Okay. 37 A. I don't know. Plat with then you were the six and then you were flower that the hamptons. Do you recall that? 38 A. I don't know. I'd have you say were the six and then you were flower that the hamptons. Do you recall that? 39 Q. Do you recall that? 30 Q. And then three were the six days. 31 A. I don't know. I'd have you were flower that the tothe Hamptons. Do you recall that? 32 A. Yes. 33 A. I don't	12		12		1
14 Q. ···the ·· 15 A. Yes. 16 Q articles ·· 17 A. Yes. Thank you. 18 Q at issue in this litigation? 19 A. Yes, I do. Yes. 20 Q. And one of them was about secret auditing of 21 Suri. Do you recall that? 21 A. I don't recall all of them, no. 22 A. I don't recall all of them, no. 23 Q. Or that you were creating a wedge between Katie 24 and Sur? 25 A. I don't recall all those. Page 94 1 Q. Or that Suri was kept in a windowless room at 2 one of your homes? 3 A. I remember stuff when Suri was born, I do. I don't know if it was specifically that, but I do recall some of those kinds of statements. 4 Q. Defore a claim letter is sent do you approve the claim letter? 5 A. No, not all of them. 9 Q. Do you read the applicable articles that are being challenged? 1 A. No, not all of them or I read them, yes. 1 A. I get briefed on them or I read them, yes. 1 A. I get briefed on it, that's by Amanda Landberg? 1 A. By Almanda or if it's a legal thing I'll call Bert, discuss it with my counset. 1 Q. Okay. Now, there came a time, Mr. Cruise, that you and your wife separated; is that right, Katie Holms? 2 A. Where she filed divorce. 2 Q. Yes. And that was at the end of June 2012? 2 A. Yes. 2 Q. Okay. But the other sisters don't you have three sisters? 2 A. Hore is siters? 3 A. Where she filed divorce or rather since prior to that time, from June 18th of 2012 until Thanksgiving of of 2012, you only saw Suri a few times; isn't that 2 G. Do under the days of July 17th to the 19th the path into Now a cance into New York, and then you went on the New York and you stopped in New York for read than? 3 A. Uh-huh. 4 Q. Do you came to New York and picked up Suri and you took her to Disney World? 3 A. Uh-huh. 4 Q. Do you came to New York and picked up Suri and you took her to Disney World? 3 A. Okay. 4 Q. Do you under that you deform the New York and picked up Suri and you took her to Disney World? 4 A. None. 5 Q. Do you reall than? 6 Q. Okay Do you have any reason to dispute that calculation? 6 Q. One or more of your sisters liv	13		13		
15 A. Yes. 16 Q. — articles — 16 Q. — articles — 17 A. Yes. Thank you. 18 Q. — at issue in this litigation? 19 A. Yes, I do. Yes. 20 Q. And one of them was about secret auditing of 21 Surf. Do you recall that? 22 A. I don't recall all of them, no. 23 Q. Or that you were creating a wedge between Katie 24 and Surf? 25 A. I don't recall all those. 26 Q. Or that Suri was kept in a windowless room at 2 one of your homes? 27 A. I remember stuff when Suri was born, I do. I don't know if it was specifically that, but I do recall 5 some of those kinds of statements. 29 Q. Do you read the applicable articles that are being challenged? 20 Q. Or dad again, I think you testified to this, and I applogize if I'm asking yun to repeat it, but when you say you get briefed on it, that is by Amanda Landberg? 31 A. I get briefed on them or I read them, yes. 32 Q. And again, I think you testified to this, and I soplogize if I'm asking yun to repeat it, but when you and you get briefed on it, that is by Amanda Landberg? 32 A. Where she filed divorce. 33 A. Where she filed divorce. 34 A. Where she filed divorce. 35 C. A. Yes. 36 Q. Do you and you stopped in New York and picked up Suri and you took her to Disney World? 36 A. Un-huh. 47 A. Yes, I do. 48 Q. Oyou recall that? 49 Q. Do you recall that? 40 A. Oyou recall all those. 41 papproximately, when you came jo New York and picked up Suri and you took her to Disney World? 41 papproximately, when you came jo New York and picked up Suri and you took her to Disney World? 41 papproximately, when you dame jo New York and picked up Suri and you took her to Disney World? 42 A. Yes, I do. 43 A. Un-huh. 44 Q. Do you recall that? 45 A. Yes, I do. 46 Q. Do you recall that? 46 Q. Do you recall that? 47 A. Yes, I do. 48 Q. Do you recall that? 48 A. No, not all of them. 49 Q. Do you read the applicable articles that are being challenged? 49 Q. Do you have any reason to dispute that calculation? 40 C. Point to your divorce with Ms. Holmes was Ms. Holmes close with your sisters? 40 A. Yes. 41 Sabella	1			1	
16 Q articles 17 A. Yes. Thank you. 18 Q at issue in this litigation? 19 A. Yes. I do. Yes. 20 Q. And one of them was about secret auditing of 21 Suri. Do you recall that? 22 A. I don't recall all of them, no. 23 Q. Or that you were creating a wedge between Katic 24 and Suri? 25 A. I don't recall all those. 26 Page 94 1 Q. Or that Suri was kept in a windowless room at 2 one of your homes? 2 A. I remember stuff when Suri was born, I do. J 3 don't know if it was specifically that, but I do recall some of those kinds of statements. 4 Q. De before a claim letter is sent do you approve 5 the claim letter? 8 A. No, not all of them. 9 Q. Do you read the applicable articles that are 10 being challenged? 11 A. Non. 12 Q. And again, I think you testified to this, and I apologize if I'm asking you to repeat it, but when you say you get briefed on ith my counsel. 19 Q. And again, I think you testified to this, and I ayou and your wife separated; is that right, Katie 19 Holmes? 20 A. Where she filed divorce. 21 Q. Yes. And that was at the end of June 2012? 22 A. Yes. 23 Q. And was she close with your sisters? 24 A. Yes. 25 Q. And was she close with your sisters? 26 A. Yes. 27 A. Yes. 28 Q. And was she close with your sisters? 28 A. No, not all of them. 39 Q. Do you have any reason to dispute that calculation? 30 A. None. 31 A. Friere is it correct you have three sisters? 31 A. Fairly, yes. 32 A. A. None point Cass did when we were living on Alpine. 32 A. Yes. 33 A. Fairly, yes. 34 A. Fairly, yes. 35 A. A. None point Cass did when we were living on Alpine. 36 A. Okay. 37 A. A. None Point Cass did when we were living on Alpine. 38 A. Fairly, yes. 49 Q. Okay. But the other sisters don't you have three sisters? 40 A. A. Three sisters. 40 C. Okay. But the other sisters don't you have three sisters? 41 A. Three sisters. 42 A. Yes. 43 C. Okay. 44 A. Yes. 45 C. D. Whey all live in Los Angeles?	1				
17 A. Yes, Thank you. 18 Q. — at issue in this fitigation? 19 A. Yes, I do. Yes. 20 Q. And one of them was about secret auditing of 2	1		1	le la	
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9 Q. Do you have any reason to dispute that 10 being challenged? 11 A. I get briefed on them or I read them, yes. 12 Q. And again, I think you testified to this, and I 13 apologize if I'm asking you to repeat it, but when you 14 say you get briefed on it, that's by Amanda Lundberg? 15 A. By Annanda or if it's a legal thing I'll call 16 Bert, discuss it with my counsel. 17 Q. Okay. Now, there came a time, Mt. Cruise, that 18 you and your wife separated; is that right, Katie 19 Holmes? 20 A. Where she filed divorce. 21 Q. Yes. And that was at the end of June 2012? 22 A. Yes. 23 Q. And since the divorce or rather since prior 24 to that time, from June 18th of 2012 until Thanksgiving 25 of 2012, you only saw Suri a few times; isn't that 26 C. Do you have any reason to dispute that 26 calculation? 27 A. None. 28 Q. Prior to your divorce with Ms. Holmes was 29 Ms. Holmes close with your other children, Connor and 29 Land was she close with your sisters? 20 A. Fairly, yes. 21 Q. One or more of your sisters lived in the home; 22 A. Yes. 23 Q. Okay. But the other sisters don't you have 24 to that time, from June 18th of 2012 until Thanksgiving 25 of 2012, you only saw Suri a few times; isn't that 26 Do uthey all live in Los Angeles?	7	the claim letter?			
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25 of 2012, you only saw Suri a few times; isn't that 25 Q. Du they all live in Los Angeles?	1			- I	
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		Page 95	1	Page 97	

25 (Pages 94 to 97)

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		T	
1	A. No, they don't. One lives in Florida. Two	1	MS. McNAMARA: Let's mark as Exhibit Number
2	live in Los Angeles.	2	106 thank you an excerpt from www.scientology.org
3	Q. Okay. And was Katie close to your mother as	3	which is the Scientology website.
4	well?	4	(Exhibit 106 marked)
5	A. Yeah, close enough, yes.	5	BY MS. McNAMARA:
6	Q. Tassume you had friends in the Church?	6	Q. Are you familiar with that, Mr. Cruise?
7	A. Uh-huh, many friends.	7	 A. I know there is a Scientology website. I don't
8	Q. And during the marriage was Katic a	8	know the address.
9	practitioner of Scientology?	9	Q. Okay. Two-page document with the title
10	 Yes, and before the marriage. 	10	"Scientology. What Does 'Suppressive Person' Mean"?
11	Q. And did she leave the Church when she divorced	11	Prior to the break, Mr. Cruise, I was asking
12	you?	12	you about what a suppressive person means within the
13	A. Yes.	13	Church, and I appreciate that you didn't want to engage
14	Q. Had she left the Church prior to that time?	14	in generalities
15	 Not to my knowledge. 	15	A. Uh-huh.
16	Q. Would you consider would the Church consider	16	Q and that it can mean many things. So you're
17	Ms. Holmes to be a suppressive person upon leaving the	17	welcome to look at this, but I wanted to direct your
18	Church?	18	attention to the bottoni of the page.
19	A. There is that is a distortion and a	19	A. Which part of the bottom of the page, please?
20	simplification of of the matter.	20	Q. Where it says about declaring someone a
21	Q. Okay. Explain to me what does a suppressive	21	suppressive person it says, "This can be done through
22	person mean within the Church.	22	criminal acts already recognized by society as unlawful
23	A. Someone who is basically has an antisocial	23	or through the commitment of acts deemed Suppressive i
24	personality, someone who is dishonest, evaluates and	24	the Scientology Justice Codes, which includes the
25	invalidates to the extreme. It goes on from there.	25	Suppressive Act of publicly renouncing the faith."
	Page 98		Page 100
1	There is many different aspects to it. I don't want to	1	A. Uh-huh.
2	just give an oversimplification of religious doctrine.	2	Q. Do you see that?
3	Q. And I don't want you to either. But one aspect	3	A. Yes.
4	of someone being a suppressive person or I think you	4	Q. Did you understand that publicly renouncing
5	11	5	
	sometimes refer to it as SP; is that right?	6	one's faith is deemed to be a suppressive act within the Church, at least
6	A. Uh-huh, yes.	7	
7	Q. One aspect of someone being SP is when they		A. Yes.
8	leave the Church, isn't it?	8	Q according to this website?
9	A. Yeah, but it's also an oversimplification of	9	A. Yes.
10	something, and just to state it in a simple term,	10	Q. And it goes on to say on the next page that
11	there's it's just a broader subject.	11	"When someone has been expelled from the religion, the
12	Q. Okay. I'm being told by the videographer that	12	person loses both his or her fellowship with the Church
13	we're about done with the tape so	13	as well as with other Scientologists."
	-		
14	A. Sure.	14	A. Uh-liuh.
15	A. Sure. Q we need to go off the record and we can take	15	Q. Do you see that?
15 16	A. Sure. Q we need to go off the record and we can take a break if you want.	15 16	Q. Do you see that? A. Sure.
15 16 17	A. Sure. Q we need to go off the record and we can take a break if you want. THE VIDEOGRAPHER: This marks the end of Media	15 16 17	Q. Do you see that?A. Sure.Q. Do you understand that to be true · · ·
15 16	A. Sure. Q we need to go off the record and we can take a break if you want. THE VIDEOGRAPHER: This marks the end of Media Number I in the video deposition of Toni Cruise. The	15 16 17 18	Q. Do you see that?A. Sure.Q. Do you understand that to be trueA. Yes.
15 16 17	A. Sure. Q we need to go off the record and we can take a break if you want. THE VIDEOGRAPHER: This marks the end of Media	15 16 17	Q. Do you see that?A. Sure.Q. Do you understand that to be true · · ·
15 16 17 18	A. Sure. Q we need to go off the record and we can take a break if you want. THE VIDEOGRAPHER: This marks the end of Media Number I in the video deposition of Toni Cruise. The	15 16 17 18	 Q. Do you see that? A. Sure. Q. Do you understand that to be true A. Yes. Q within the Church of Scientology? A. Ull-huh.
15 16 17 18 19	A. Sure. Q we need to go off the record and we can take a break if you want. THE VIDEOGRAPHER: This marks the end of Media Number 1 in the video deposition of Tom Cruise. The time is approximately 11:09 a.m. and we're going off the	15 16 17 18 19	 Q. Do you see that? A. Sure. Q. Do you understand that to be true A. Yes. Q within the Church of Scientology?
15 16 17 18 19 20	A. Sure. Q we need to go off the record and we can take a break if you want. THE VIDEOGRAPHER: This marks the end of Media Number I in the video deposition of Tom Cruise. The time is approximately 11:09 a.m. and we're going off the record. (Recess)	15 16 17 18 19 20	 Q. Do you see that? A. Sure. Q. Do you understand that to be true A. Yes. Q within the Church of Scientology? A. Uli-huh.
15 16 17 18 19 20 21	A. Sure. Q we need to go off the record and we can take a break if you want. THE VIDEOGRAPHER: This marks the end of Media Number I in the video deposition of Tom Cruise. The time is approximately 11:09 a.m. and we're going off the record. (Recess)	15 16 17 18 19 20 21	 Q. Do you see that? A. Sure. Q. Do you understand that to be true A. Yes. Q within the Church of Scientology? A. Ult-huh. Q. Since Ms. Holmes has left the Church of Scientology have and I guess I'm going to focus
15 16 17 18 19 20 21 22	A. Sure. Q we need to go off the record and we can take a break if you want. THE VIDEOGRAPHER: This marks the end of Media Number I in the video deposition of Tom Cruise. The time is approximately 11:09 a.m. and we're going off the record. (Recess) THE VIDEOGRAPHER: This marks the beginning of	15 16 17 18 19 20 21 22	 Q. Do you see that? A. Sure. Q. Do you understand that to be true A. Yes. Q within the Church of Scientology? A. Ult-huh. Q. Since Ms. Holmes has left the Church of Scientology have and I guess I'm going to focus
15 16 17 18 19 20 21 22 23	A. Sure. Q we need to go off the record and we can take a break if you want. THE VIDEOGRAPHER: This marks the end of Media Number 1 in the video deposition of Tom Cruise. The time is approximately 11:09 a.m. and we're going off the record. (Recess) THE VIDEOGRAPHER: This marks the beginning of Media Number 2 in the video deposition of Tom Cruise.	15 16 17 18 19 20 21 22 23	Q. Do you see that? A. Sure. Q. Do you understand that to be true A. Yes. Q within the Church of Scientology? A. Ult-huh. Q. Since Ms. Holmes has left the Church of Scientology have and I guess I'm going to focus between the period of June and November of 2012, have

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1	that other publications were reporting that Katie left	1	first of all, I don't know everything that they said in
2	you in part to protect Suri from Scientology, are you	2	that, and there are many different other aspects to the
3	not?	3	divorce.
4	A. I heard of that. I don't know where it was all	4	Q. Is Suri currently practicing Scientology?
5	coming from, but I heard that horrific thing.	5	A. No.
6	Q. And do you know whether you or your counsel	6	Q. From the time Ms. Holmes filed for divorce in
7	sought any retractions from such published statements?	7	late June, to your knowledge has Suri practiced
8	A. It is a blur. I'm sure they did at some point.	8	Scientology?
9	I don't know specifically which ones.	9	A. Here's again, when you say "practiced
10	Q. Did you assert any legal claims against	10	Scientology," it shows a lack of understanding and
11	publications arising out of the publication of the	11	respect towards my religion. Let me just
12	contention that Ms. Holmes left you in part to protect	12	Q. 1
13	Suri from Scientology?	13	A. I understand that. I just
14	A. No, only the one that said that I abandoned my	14	Q. I do not mean any disrespect, Mr. Cruise.
15	daughter.	15	A. I I understand that.
16	Q. So you didn't sue over those contentions?	16	Q. And maybe I'm using maybe you can tell me,
17	A. Only the one only this one.	17	when someone is
18	Q. And do you believe it to be false that	18	A. That's why I am
19	Ms. Holmes left you in part to protect Suri from	19	Q participating
20	Scientology?	20	A. Let me finish, please.
21	A. Listen, I find that question offensive. I find	21	Q. Okay. Absolutely.
22	it those statements offensive. And like with any	22	A. Let me finish, I let you finish.
23	relationship, there are many different levels to it.	23	Q. Absolutely,
24	You know, I I find it very offensive. There is no	24	A. Let me finish.
25	need to protect my daughter from my religion.	25	Q. Absolutely. You learn very well.
	Page 110		Page 112
	A CONTRACT OF THE CONTRACT OF		
1	Q. Okay. My question to you, and I apologize if	1	A. Getting the hang of this.
2	you find it offensive. And again, I repeat, I'm sorry	2	It shows a lack of respect and understanding
3	we're here. I don't want to be here. My client doesn't	3	for my religion. That is understandable in that it is a
4	want to be here. They don't think that this warrants a	4	minority religion. People don't know and understand,
5	litigation, But	5	and of course the way things are reported or taken out
6	A. I believe it does.	6	of context, like many things, can create this kind of
7	Q. I know you do, that's why we're here.	7	sense of what something is as opposed to people going
8	A. Yes. Yes.	8	and finding out and knowing about it themselves.
9	 Q. But unfortunately, we are here and you have to 	9	To a child Scientology is it's not
10	answer the questions. And the question is whether you	10	something look, it's hard to sit here and say, you
11	believe the published contentions that Katie Holmes left	11	know, there is not in the Catholic Church there is,
12	you in part to protect Suri from Scientology, whether	12	you know, you have the First Communion. You have, you
13	those are false?	13	know, Bat Mitzvahs, Bar Mitzvahs in Judaism. Certainly
14	A. Do I believe that?	14	there are religious rites, but very much so it's about
15	Q. Do I believe do you believe that that is a	15	the application of something or doing it's not
16	false statement?	16	you it's an applied religious philosophy, meaning
17	A. I believe it is a false statement.	17	it's something that you study, you learn, and you apply
18	Q. And Ms. Holmes has never indicated in any way	18	to the degree that and each individual has a level of
19	that that was one of the reasons that she left you?	19	application that they want to apply. Just because
20	A. That is that she beft me because of?	20	someone, you know so when you're talking about a
21	Q. To protect Suri from Scientology.	21	seven-year-old, you know, it's not the same thing as
22	A. Did slie say that? That was one of the	22	as Catholicism or Judaism. It's just it's different.
23	assertions, yes.	23	It's a different kind of thing. O. Okay.
24	Q. So those publications were not false? A. I mean I those publications I don't know	25	A. So is but, you know, to say that even Suri
25	A. Timeaii 1 those publications I don't know Page 111	23	Page 113
	raye III		tage 113

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