

1 Q. Leading up to this February intervention,  
2 did you have any conversations with Kevin Federline?

3 A. Yes.

4 Q. How many?

5 A. I didn't speak to him directly. I spoke to  
6 him in the context of a conference call with other  
7 people on the line, which probably happened -- he  
8 was probably on about two or three of those calls.

9 Q. Who else was on those calls?

10 A. It varied at times, but almost -- with some  
11 exceptions, it was always myself, Dr. Betty Wyman,  
12 Adam Leber, Gary Stiffelman, Laura Wasser, Vivian  
13 Lewitt. And then at times Lynne Spears, Jamie  
14 Spears, occasionally Brian Spears and occasionally  
15 Kevin Federline. I believe that's everyone. I may  
16 have left out -- I don't think I left anybody out  
17 but I could have.

18 Q. The conference calls in which Kevin  
19 participated, did Ms. Wasser participate in any of  
20 those calls?

21 A. Yes.

22 Q. In regard to those calls, did anyone else  
23 participate?

24 A. Not that I recall.

25 Q. How many of those conference calls occurred

1 where it's between you, Laura and Kevin?

2 A. Only maybe two, I'd say.

3 Q. Both before the intervention?

4 A. They were both before the intervention.

5 Maybe even one. Might even been one.

6 Q. How long was that conversation?

7 A. How long did it go on?

8 Q. Yes.

9 A. 20, 30 minutes.

10 Q. Tell me as best as you can recall what was  
11 discussed in that conversation?

12 A. This was a conversation where everybody in  
13 her life, without making a clinical assessment of  
14 her situation, was concerned about what was going on  
15 with her, and we all joined together, regardless of  
16 our specific positions or specific agendas, our  
17 specific intent, our specific roles, our specific  
18 obligations to try to figure out what to do.

19 And Kevin was brought on that call because  
20 he was going to be involved in the planning -- I'm  
21 sorry, the execution, I should say, of that  
22 intervention. He was a necessary party. There were  
23 no legal issues discussed. There were no -- nothing  
24 to that -- nothing in that order. Only discussion  
25 about the execution of an intervention.

1 Q. Why was Kevin a necessary party?

2 A. Because --

3 MR. NOVICOFF: Objection. Calls for  
4 speculation.

5 BY MR. SIMON:

6 Q. You previously mentioned that Kevin was a  
7 necessary party. Why in your opinion was he a  
8 necessary party?

9 A. Because we needed him to be able to --  
10 Kevin had already, through his attorney, come  
11 forward and said, "I'm putting my foot down. Unless  
12 she goes into rehab, I'm going to" -- I think at  
13 that point, if memory serves me correctly, it wasn't  
14 a specific date or time. Maybe there was that --  
15 that was connected to the threat of "If she doesn't  
16 get help, I'm taking those kids away."

17 So that had already been put out there.  
18 Kevin's role in that conversation was to talk to him  
19 about the role he would play in the intervention.  
20 It was necessary to use Kevin in order to get in the  
21 door with Britney. Britney at that point, I  
22 believe, was shutting herself off from her  
23 professionals, for the most part, in an attempt to  
24 sort of avoid I think what she believed -- I'm  
25 guessing what she believed to be sort of something

1 that was inevitable.

2 So to answer your question directly, it was  
3 in order to help us execute the intervention, we  
4 needed him. He could get access to her where we  
5 couldn't.

6 Q. Was that help to be in the form of Kevin  
7 threatening legal proceedings to take legal custody  
8 away from Britney in the event she did not get help?

9 A. In other words --- you have to ask that  
10 question more specifically. Did we ask Kevin to do  
11 that?

12 Q. Was that discussed with Kevin?

13 A. Was it discussed with Kevin on that call?  
14 No, but it was -- I don't recall if it was an  
15 assumption or a fact stated that that was happening.  
16 But there was no specific discussion as to -- I know  
17 that it was a fact stated, that that was happening.  
18 Let me put it that way, if that answers your  
19 question.

20 Q. Was Kevin encouraged to relay to Britney  
21 that he would take legal action to take custody away  
22 from Britney if she did not seek help?

23 A. I don't recall that he -- he was not  
24 encouraged to do anything. It was a very specific  
25 conversation about a very specific issue. I don't

1 recall him being -- I don't recall anybody trying to  
2 encourage him to do anything other than to  
3 participate in -- to play a role in the  
4 intervention, considering the fact that he was  
5 already -- it had already been stated by his  
6 attorneys that he was going to seek custody if she  
7 did not go into -- get help.

8           So in other words, everybody was on the  
9 same page with respect to the same goal, and it was  
10 all focused on the intervention. There was nothing  
11 else discussed in any detail.

12           Q. Well, you mentioned that Kevin was  
13 necessary for the intervention, that he had a role  
14 to play in the intervention?

15           A. Right.

16           Q. Was that role, as discussed with Kevin in  
17 these conversations, to place pressure on Britney to  
18 get help or lose custody of her children?

19           A. Read that back.

20           MR. NOVICOFF: Are you asking what your  
21 client told Mr. Rudolph?

22 BY MR. SIMON:

23           Q. No. I'm asking what was discussed with  
24 Kevin in those conversations about the role that he  
25 would play.

1           A.    I think we talked about what the plan was  
2 at the time.  I'm trying to remember what the  
3 initial plan was.

4           The initial plan, I believe -- I could be  
5 wrong about this because it evolved and it evolved  
6 very quickly because of her, because of certain  
7 roadblocks she threw up.

8           I believe the initial plan was I was going  
9 to go in, talk to her, confront her, encourage her  
10 to see things the way everybody else saw them and  
11 have her speak to an interventionist who I had  
12 brought on board by that point.

13           And I believe that the idea was that Kevin  
14 was going to be there to take the children and  
15 assure her that if all had gone well and she did do  
16 what he -- and really it was his demands that were  
17 the gasoline for the engine here.  It was his  
18 demands, by his -- the looming threat of him filing  
19 for full custody of the children that was going to  
20 be the carrot that got held in front of Britney to  
21 encourage her to do something which I had been told  
22 by every -- the professionals involved that nobody  
23 does voluntarily or very few people do voluntarily.

24           MR. NOVICOFF:  I'm slightly concerned about  
25 the clarity of your testimony.  You're talking about

1 an initial plan, but I think it's not clear who it  
2 is that developed or was involved in developing this  
3 plan. In other words --

4 MR. KAPLAN: Well, Counsel --

5 THE WITNESS: If you want to ask me more  
6 specific questions, I'm happy to answer them.

7 MR. KAPLAN: Also, if there is an  
8 objection, of course you can state that. You will  
9 have an opportunity to ask questions, I believe, at  
10 the conclusion of the direct here. I think it's  
11 better than just putting that kind of testimony on  
12 the record -- it's not even testimony. Just  
13 guidance.

14 MR. NOVICOFF: Fair enough. I don't  
15 mind --

16 MR. KAPLAN: You can take a lunch break and  
17 discuss that at length anyhow.

18 MR. NOVICOFF: I guess I don't mind  
19 conducting a long redirect of my client at your all  
20 expense in your case, but he is still involved in  
21 pending proceedings involving some of the parties.

22 MR. KAPLAN: I understand that sensitivity.

23 MR. NOVICOFF: And I'm just -- again, more  
24 for the sake of clarity than anything else, I want  
25 it to be clear what he's testifying to.

1           So I would just say when you are describing  
2 things that were said, try to attach them to  
3 particular people who said them.

4           MR. KAPLAN: Totally fine.

5 BY MR. SIMON:

6           Q. In regard to this initial plan, with whom  
7 did you have these discussions?

8           A. With regard to the initial plan?

9           Q. That Kevin -- there would be the looming  
10 threat that Kevin would seek full custody in the  
11 event that Britney did not seek help?

12          A. Are you talking about before the  
13 conversation with Kevin?

14          Q. At any time before the intervention, with  
15 whom did you have --

16          A. There were a series of conference calls  
17 with the people on the phone that I told you.

18          Q. Which included Laura Wasser. Did you have  
19 these discussions with Ms. Wasser?

20          A. Yes.

21          Q. What was discussed in regard to Kevin's  
22 role in those conversations?

23          A. Well, Laura explained to all of us that --  
24 I don't remember if this was -- again, timing -- I'm  
25 not 100 percent on timing. At some point Laura -- I



1 can't tell if you it was in the beginning or the  
2 middle, but at some point Laura explained to us --  
3 yeah, explained to us that Kevin had communicated to  
4 his attorneys that he was not going to sit around  
5 and allow this to happen any longer; he was  
6 demanding that she get help or else he was going to  
7 take some extreme action.

8 Q. Was there further discussion that that  
9 threat by Kevin should be used to place pressure on  
10 Britney to seek help?

11 MR. NOVICOFF: Further discussion with  
12 Ms. Wasser?

13 BY MR. SIMON:

14 Q. Correct.

15 A. At some point, yes.

16 Q. Now, you mentioned that you arranged for  
17 the interventionist, I think is the term you used?

18 A. Right.

19 Q. Who was that?

20 A. Earl Hightower.

21 Q. Why Earl Hightower?

22 A. He was recommended to us by Betty Wyman.

23 Q. So before you got involved with  
24 Mr. Hightower, you had some discussions with Betty  
25 Wyman?

1 A. Correct.

2 Q. Did someone introduce you to Betty Wyman?

3 A. I had met Betty Wyman a number of years  
4 ago.

5 Q. Why Betty Wyman in terms of her involvement  
6 in this process?

7 A. Because she -- Betty Wyman, as far as I'm  
8 concerned, is the best at what she does, the most  
9 discreet professional I've ever dealt with.

10 Q. What does she do?

11 A. She is a -- I don't know how to describe  
12 exactly what she does. She is an expert -- she's a  
13 doctor, and she is an expert on drug and  
14 alcohol-related illnesses and, in particular, deals  
15 a lot with celebrity clientele.

16 Q. To your knowledge she had helped Britney's  
17 father Jamie Spears with alcoholism; correct?

18 A. That's correct.

19 Q. Did someone make the suggestion to have  
20 Betty Wyman get involved in this process?

21 A. Yes.

22 Q. Who was that?

23 A. I don't recall if it was me or the Spears  
24 family, but it was one of us.

25 Q. And how many discussions did you have with

1 Miss Wyman before the February 14th intervention?

2 A. Many.

3 Q. Were these all within a one-week period of  
4 time?

5 A. No.

6 Q. Longer period?

7 A. Bit of a longer period of time. I'd say  
8 within, roughly, three weeks preceding, three to  
9 four weeks preceding that, maybe.

10 Q. Tell me as best as you can recall what was  
11 discussed between you and Dr. Wyman.

12 MR. NOVICOFF: Let me just interrupt for a  
13 moment. Seems to me this question is inquiring into  
14 a communication with a medical professional made by  
15 Mr. Rudolph in his capacity as Spears agent/manager.  
16 I don't want to get involved in your case. I don't  
17 know whether there is an objection on that basis.

18 I think Mr. Rudolph and I are fortunate  
19 because Miss Spears is represented here; so I'm going  
20 to defer to Ms. Wasser about whether or not she is  
21 okay with answering this question or if Ms. Wasser  
22 wants judicial -- wants a ruling on the question.

23 MS. WASSER: I think we should probably  
24 have a discussion about what limited waiver, if any,  
25 there's been of the privilege with Dr. Wyman.

1           MR. KAPLAN: I'm not sure -- when you say  
2 that she's a medical professional, that might  
3 assumes facts that haven't been established. I'm  
4 not sure --

5           MR. NOVICOFF: She said she's a doctor.

6           MR. KAPLAN: So am I.

7           MR. NOVICOFF: I have no idea. I'm  
8 certainly not -- the only way I'm going to instruct  
9 him not to answer is if Ms. Wasser tells me that he  
10 shouldn't answer. It's entirely up to Ms. Wasser  
11 here.

12          MR. KAPLAN: Are we on or off the record?

13          MR. NOVICOFF: We're on.

14          MR. SIMON: I've spoken to Robert Wyman,  
15 who's her brother and an attorney. She's not a  
16 medical doctor. Her Ph.D is in criminology and  
17 sociology, and hence the doctor label attached to  
18 her. Not a psychologist, not a family therapist.

19          MR. NOVICOFF: News to me but you certainly  
20 don't have to persuade me of anything. I will not  
21 interfere with this examination unless Ms. Wasser  
22 instructs us not to answer and asserts a privilege  
23 on Ms. Spears' behalf.

24          MS. WASSER: I believe I have asserted a  
25 privilege already on Ms. Spears' behalf. I'm just

1 wondering -- I don't want to interrupt you. I'll  
2 let you go as far as you can go. Where are you  
3 going with this part of it?

4 MR. SIMON: I'm going --

5 MS. WASSER: Are you asking about  
6 Mr. Rudolph about conversations that he had with  
7 Betty Wyman during the course of -- preceding the  
8 intervention?

9 MR. SIMON: Yes.

10 MS. WASSER: Then we will assert the  
11 privilege there.

12 MR. SIMON: What privilege?

13 MS. WASSER: The privilege -- even if she  
14 is not a medical doctor, there still is  
15 psychological-patient privilege.

16 MR. SIMON: She's not a psychologist.

17 MS. WASSER: Has Robert Wyman raised any  
18 privileges on her behalf?

19 MR. SIMON: No.

20 MS. WASSER: He hasn't?

21 MR. SIMON: No. The only thing he's raised  
22 is this issue of the confidentiality agreement, but  
23 that applies to Betty Wyman. That doesn't apply to  
24 this witness.

25 MS. WASSER: I'm going to raise it. I