UNITED STATES DISTRICT COURT

SOUTHERN DISTRICT OF FLORIDA

MIAMI DIVISION

CASE NO.: 08-22261-CIV-HUCK

MICHAEL I. GOLDBERG, in his capacity as court-appointed) Receiver for Worldwide Entertainment Group & Inc., a) Delaware corporation, et al.,) Plaintiffs, Ancillary Case No.: 06-20975-CIV-HUCK vs. PARIS HILTON ENTERTAINMENT, INC., a California corporation, and PARIS HILTON, an individual, Defendants.

DEPOSITION OF PARIS HILTON

March 4, 2009

David S. Coleman, CSR #, 4613 277808

Court Reporters

1 very remote place. 02:16 Do you recall the name of the camp? 02:16 2 Q I think it was called Camp Shawnee, but I don't Α 3 02:16 know if they made that name up for the show. 4 02:16 And did you have access to a telephone while you 02:16 5 were at that camp? 6 02:16 Α When you're on "The Simple Life" -- like I did 7 02:16 it for five seasons -- we're not allowed to have cell 8 02:16 They take them away and -- because on the show, 02:16 the premise of the show is they took away our cell phones 02:16 10 and our credit cards, and there there was like absolutely 02:16 11 no service, so even if we did have them, nothing would go 02:16 12 It was like a dead cell area. through. 02:16 13 Well, ever on "The Simple Life," were you ever 02:16 14 02:16 15 filmed with a cell phone? Sometimes maybe like at the house like we would 02:16 16 Α 02:16 17 as a joke like go steal the phone from someone. producers would tell us like, oh, go sneak that person's 02:17:18 phone, but it was basically -- the show is a reality 02:17 19 show, but it's kind of set up, and they set up scenes. 02:17 20 So I don't remember really, but if we were, it was 02:17 21 02:17 22 probably just us pretending to do it. When you were doing "The Simple Life" 5, did you 02:17 23 have any access to a landline telephone? 02:17 24

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No.

We weren't supposed to use the phones.

02:17	1	know there was like one phone in the whole place, but
02:17	2	that was for the production people
02:17	3	Q Did you ever
02:17	4	A and we weren't allowed in the production
02:17	5	office.
02;17	6	Q Did you ever ask the production people whether
02:17	7	you could use the phone to do phone interviews?
02:17	8	A They wouldn't allow that.
02:17	9	Q But did you ever ask?
02:17	10	A No one asked me to do it, so
02;17	11	Q Now, when you were doing "The Simple Life" No.
02:17	12	5, did you have any way of communicating with Jason
02:17	13	Moore?
02:17	14	A The only time I would really communicate with
02:17	15	him is at the end of the day if I went home, or he
02:17	16	sometimes would come to set to check on me.
02:18	17	Q And did you have any way of communicating with
02:18	18	Alanna while you were on the set of "Simple Life"?
02:18	19	A No. The phone didn't work.
02:18	20	Q Did your e-mail work from "The Simple Life"?
02:18	21	A Nothing. Nothing worked. It would just have
02:18	22	like an "X" next to it.
02:18	23	Q Do you know that there was a hotel at the camp
02:18	24	for "The Simple Life" 5?
02:18	25	A What do you mean?

	02:36	1	A I go to my Miami a lot. I'm not sure. I can
	02:36	2	check up on it, but maybe.
	02:36	3	Q And then there is some references to from the
	02:36	4	bottom of page 64 to 65, of Monte Carlo. Do you remember
,	02:36	5	being in Monte Carlo in May of 2007?
	02:36	6	A I go there all the time. I'm not sure of the
	02:36	7	dates. Again, I'd have to look and see.
1	02:36	8	Q And where would you look?
	02:36	9	A Just pictures online.
	02:37	10	Q Are there any sites online that you think are
1	02:37	11	reliable in determining where you were on particular
	02:37	12	dates?
	02:37	13	A I don't know. I'll just look around, just press
)	02:37	14	my name and Google it and see.
	02:37	15	(Plaintiff Exhibit 18 was marked for
,	02:37	16	identification by the reporter and is
1	02:37	17	attached hereto.)
	02:37	18	BY MR. WEST:
)	02:37	19	Q Let me show you what's been marked as Exhibit
•	02:37	20	No. 18, which is an HIL 2048 through 2066, which are
	02:37	21	redacted versions of your Cingular bills, and I'll ask
)	02:37	22	you if you recognize those pages of that document.
	02;38	23	A I've never seen a phone bill of mine in my life.
	02:38	24	Q Who maintains your phone bills?
)	02:38	25	A I don't know.
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1 Who --02:38 Q 2 02:38 3 Q 02:38 4 Α 02:38 5 02:38 6 02:38 7 02:38

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A I really don't know.

Q Who receives them?

A Does it say? I don't know. I'm assuming like whoever pays my bills. I don't know. I've never looked at my phone bill in my entire life.

Q Do you know who receives the bills?

A I'm assuming Mike Hamner. I don't know who else would.

Q Is Mike Hamner involved at all in setting your schedules?

A No. Just paying bills and stuff.

Q Does Mike Hamner keep track of revenue that you receive from making personal appearances?

A I think so.

Q Have you ever asked Mike Hamner as to how much you received in 2006 regarding your fees for personal appearances?

A I never ask about that stuff.

Q Now, going back to Exhibit No. 18, on the first page it has Wednesday, March 7, and that's toward the bottom of the page, "WED" next to it on the left-hand side of the page, are those telephone calls, as far as you can tell, that you were involved in?

MR. WEINSTEN: Objection. Calls for

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to use my phone, I don't really care.

At that time did you have more than one cell Q phone?

Д I don't think so.

Do you know whether you had other phones with 0 companies other than Cingular during 2007?

I've always used Cingular. Well, it used Α to be AT&T, but I guess it's Cingular now.

Q Do you know what the reference on the phone bills is to a city that's referred to as SNMN S California?

Α Where?

Towards the bottom it says --Q

On the first page? Α

Yeah, on the first page. Q

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02:41 12

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	02:42 1	MR. WEINSTEN: Calls for speculation.
	02:42 2	THE WITNESS: I have no idea what that means.
)	02:42 3	BY MR. WEST:
	02:42 4	Q Okay.
)	02:42 5	A Is that like a city or a country, or is that
-	02:42 6	just what it means? I don't know.
	02:42 7	Q Then if you go to page 2053 on the bill, there
>	02:43 8	is a Thursday, March 15th. It's up in the middle of the
	02:43 9	page. Do you see that?
	02:43 10	. A Yeah.
>	02:43 11	Q There's phone calls being made throughout the
	02:43 12	day. Do you know who made those phone calls?
	02:43 13	MR. WEINSTEN: Objection. Where are you looking
)	02:43 14	at?
	02:43 15	MR. WEST: The middle of the page
`	02:43 16	THE WITNESS: Where is that?
J	02:43 17	MR. WEST: 2053. On the 15th.
	02:43 18	MR. WEINSTEN: Okay. You're looking at the
)	02:43 19	okay.
	02:43 20	MR. WEST: It starts at 12:01 AM and goes all
	02:43 21	the way down to 11:51 PM.
)	02:43 22	MR. WEINSTEN: Okay. Well, calls for
	02:43 23	speculation, and the document speaks for itself.
	02:43 24	BY MR. WEST:
)	02:43 25	Q And the question was, do you know who made those
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}	Case 1:08-0	cv-22	2261-FAM Document 68-5 Entered on FLSD Docket 03/20/2009 Page 10 of 22
	. 02:43	1	phone calls?
	02:43	2	A No, I don't.
)	02:43	3	Q Do you know if you made those phone calls?
	02:43	4	A I have no idea.
)	02:43	5	Q Do you recognize any of those cities that are
,	02:44	6	referenced on those phone calls on the 15th of March?
	02:44	7	A It says New York and L.A., so of course I know
>	02:44	8	people who live in both of those places, but I don't know
	02:44	9	who it is.
	02:44	10	Q What about Hawaii? Wailuk it says "Wailuk,"
)	02:44	11	W A I L U K, Hawaii.
	02:44	12	A Wailuk?
	02:44	13	Q That's what it looks like. It's an abbreviation
)	02:44	1.4	for somewhere in Hawaii.
	02:44	15	A Where is that?
`	02:44	16	Q Towards the very middle of the page at 4:16
,	02:44	17	4:15 PM.
•	02:44	1.8	A What date?
)	02:44	19	Q The 15th.
	02:44	20	A Doesn't that say what does that say? All I
	02:44	21	see is "New York"
)	02:44	22	Q It's on the line number 24 of the bill. It says
	02:44	23	"24" on the left side. Then 3:15
	02:44	24	A Are those all blacked out or something?
)	02:44	25	Q Yeah.
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	02:44	1	A Oh. I don't even know what Wailuk Wailuk
	02:45	2	Wailuk? I don't know.
1	02:45	3	Q Well, did you ever have occasion in March of
	02:45	4	2007 to call people in Hawaii?
1	02:45	5	A I don't think so. I don't really have any
	02:45	6	friends in Hawaii. Actually, I don't have any friends in
	02:45	7	Hawaii.
)	02:45	8	Q And on the next day, the Friday, the 16th, there
	02:45	9	is calls that start from 12:02 AM that go all the way
	02:45	10	down to on the next page to 11:53 PM, and my question
)	02:45	11	is do you know who made any of those phone calls?
	02:45	12	A Where?
	02:45	13	Q Starting at the bottom of that page for the
)	02:45	14	16th
	02:45	15	A Uh-huh.
	02:45	16	Q which is on line 45, next to it, it says
)	02:45	17	"FRI" for Friday.
	02:45	18	A Okay.
)	02:45	19	Q And it's 12:02 AM, and then the rest of the day
•	02:46	20	carries over onto the next page all the way down to line
	02:46	21	92, and my question is do you know who made any of those
)	. 02:46	22	phone calls on your cell phone?
	02:46	23	MR. WEINSTEN: Calls for speculation.
	02:46	24	THE WITNESS: I have no idea. This was like two
)	02:46	25	years ago. I don't really
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BY MR. WEST: 1. 02:46 2 0 Do you know if you made any of those phone 02:46 3 calls? 02:46 I don't know. I might have. I'm not sure. 4 02:46 5 02:46 It's hard to just like look at a phone bill and go like, 6 oh, yeah, I called that guy. 02;46 7 And the next one is on page 2056. On the 19th 02:46 of March, it's a Monday, it's line 179 at 1:52 AM, and 8 02:46 that day goes all the way to the top of the next page to 02:46 02:47 10 line 222 of the bill, and the same question: Do you know 02:47 11 who made those phone calls? What date are you on now? 02:47 12 MR. WEINSTEN: 02:47 13 MR. WEST: The 19th. 02:47 14 MR. WEINSTEN: The 19th. 02:47 15 MR. WEST: It's line 179 of the bill. THE WITNESS: Again, it's hard for me just to 02:47 16 like look at a phone bill and know if I did it just by 02:47 17 02:47 18 seeing a city and a time. I don't know. With my phone I never know, because I lose it all the time; my friends 02:47 19 are borrowing it. I probably get a new cell phone like 02:47 20 02:47 21 every two weeks. 02:47 22

BY MR. WEST:

02:47 23

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02:47 25

Well, if the phone numbers were on the bill, 0 would you be able to tell who the person being called was?

Q Do you remember appearing on "Letterman" the day before election day last year, and he was asking you whether you were going to go vote?

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>	Case 1:08-0	:v-22	261-FAM Document 68-5 Entered on FLSD Docket 03/20/2009 Page 16 of 22
	02:54	1	A Oh, yeah, yeah, yeah, yeah.
	02:54	2	Q And on that show you promoted your show "Paris
)	02;55	3	Hilton's BFF." Right?
	02:55	4	A Yeah, because it was airing at the time.
	02:55	5	Q Okay. And what's that show?
ን የ	02:55	6	A It's another reality show where basically it's
	02:55	7	contestants are like fighting to become my new best
)	02:55	8	friend.
	02:55	9	Q Okay. And on that show you promoted REPO! THE
	02;55	10	GENETIC OPERA. Right?
)	02:55	11	A I don't know what I talked about. Maybe.
	02:55	12	Q But you recall that at some point on a
	02:55	13	"Letterman" show, you've talked about REPO! THE GENETIC
)	02:55	14	OPERA?
	02:55	15	A Yeah.
	02:55	16	Q Okay. Do you recall if on in the November of
}	02:55	17	2008 "Letterman" you promoted your perfume I think Fairy?
	02:55	18	A Fairy Dust, yeah.
,	02:55	19	Q Fairy Dust? And
j	02:55	20	A They asked to do that, because Dave did it
	02:55	21	before with another one of my fragrances, and he does
)	02:55	22	like a joke where he drinks it or does something I
·	02:55	23	don't know. He always does funny things. He likes doing
	02:56	24	things with my perfumes and lines like that. He didn't
)	02:56	25	really drink it. It's just some water.
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02:56	1	Q Do you remember appearing on "The Letterman
02:56	2	Show" in September of 2008 and talking about your new
02:56	3	"BFF Show"?
02:56	4	A I don't remember exactly when it was, but I do
02:56	5	remember talking about it.
02:56	6	. Q Do you know if you've promoted the "BFF Show" on
02:56	7	more than one "Letterman Show"?
02:56	8	A I know I talked about it, and then again when I
02:56	9	came back, he asked me like what's going on with the
02:56	10	friends. So basically, yeah, he was just asking me if
02:56	11	I'm still friends with the person, things like that.
02:56	12	Q And do you remember appearing on "Letterman" in
02:57	13	February of well, if you look at your interrogatory
02:57	14	answer, which is on Exhibit No. 2 from today.
02:57 02:57		answer, which is on Exhibit No. 2 from today. A Uh-huh.
	15	
02:57	15 16	A Uh-huh. Q You have, "The David Letterman Show; first aired
02:57 02:57	15 16 17	A Uh-huh. Q You have, "The David Letterman Show; first aired on or around February 1, 2008; The Hottie and the
02:57 02:57 02:57	15 16 17 18	A Uh-huh. Q You have, "The David Letterman Show; first aired on or around February 1, 2008; The Hottie and the
02:57 02:57 02:57 02:57	15 16 17 18 19	A Uh-huh. Q You have, "The David Letterman Show; first aired on or around February 1, 2008; The Hottie and the Nottie."
02:57 02:57 02:57 02:57	15 16 17 18 19 20	A Uh-huh. Q You have, "The David Letterman Show; first aired on or around February 1, 2008; The Hottie and the Nottie." A Uh-huh.
02:57 02:57 02:57 02:57 02:57	15 16 17 18 19 20 21	A Uh-huh. Q You have, "The David Letterman Show; first aired on or around February 1, 2008; The Hottie and the Nottie." A Uh-huh. Q Do you remember promoting that movie on that
02:57 02:57 02:57 02:57 02:57 02:57	15 16 17 18 19 20 21 22	A Uh-huh. Q You have, "The David Letterman Show; first aired on or around February 1, 2008; The Hottie and the Nottie." A Uh-huh. Q Do you remember promoting that movie on that episode of "Letterman"?
02:57 02:57 02:57 02:57 02:57 02:57 02:57	15 16 17 18 19 20 21 22 23	A Uh-huh. Q You have, "The David Letterman Show; first aired on or around February 1, 2008; The Hottie and the Nottie." A Uh-huh. Q Do you remember promoting that movie on that episode of "Letterman"? A Yes. Q Okay. And do you recall that Mr. Letterman
02:57 02:57 02:57 02:57 02:57 02:57 02:57 02:57 02:57	15 16 17 18 19 20 21 22 23	A Uh-huh. Q You have, "The David Letterman Show; first aired on or around February 1, 2008; The Hottie and the Nottie." A Uh-huh. Q Do you remember promoting that movie on that episode of "Letterman"? A Yes. Q Okay. And do you recall that Mr. Letterman introduced you and mentioned that you were the star of

)	Case 1:08-c	:v-22	2261-FAM Document 68-5 Entered on FLSD Docket 03/20/2009 Page 18 of 22
	02:57	1.	to come on the show?
	02:57	2	A Like when I was walking on?
)	02:57	3	Q When you were walking in.
	02:57	4	A I'm always backstage when I'm walking on, so
)	02;57	5	Q Oh, so you don't hear?
	02:57	6	A and I'm so nervous, and I can't even hear
	02:57	7	anything, and the music's like playing, so you can't I
)	02:57	8	don't know how he introduced me.
	02:57	9	Q Okay. And do you do you recall telling
	02:57.	10	Mr. Letterman that you were there to promote THE HOTTIE
)	02:57	11	AND THE NOTTIE when you were being interviewed by him?
	02:57	12	A I don't know exactly what I said, because as
	02:57	13	soon as I do any one of those interviews, I get really
)	02:58	14	nervous, and like after I don't really remember what I
	02:58	15	said because I get really I don't know, I just get
`	02;58	16	really shy on those talk shows. So I don't know what I
1	02:58	17	said, but I know I talked about it.
	02:58	18	Q On that same show do you recall also promoting a
')	02;58	19	shoe line?
	02:58	20	A Probably. I think I was like wearing them or
	02:58	21	something.
)	02:58	22	Q Do you recall on that same show promoting a
	02:58	23	clothing line?
	. 02;58	24	A I think he asked me or he said something about
)	02:58	25	my clothing.

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	02:58 1	Q Okay. And do you recall on that episode
	02:58 2	promoting jewelry?
)	02:58 3	A I don't remember exactly what I promoted, but
	02:58 4	maybe. Probably. I don't I would have to watch it
>	02:58 5	again.
	02:58 6	Q Okay. Well, do you have you ever recall
	02:58 7	promoting your hair extensions on "Letterman"?
) .	02:59 8	A Yeah. He asked for them to be sent to him
	02:59 9	because he thought it'd be funny. He loves kind of
	02:59 10	productey [sic] things.
)	02:59 11	Q Do you recall ever talking on "Letterman" about
	02:59 12	your cell phone video game?
	02:59 13	A Maybe. I think so. I'd have to watch these all
)	02:59 14	again, but
.,	02:59 15	Q Do you recall any discussions on "The Letterman
,	02:59 16	Show" regarding promoting your record label?
?	02:59 17	A I know I talked about my music.
	02:59 18	Q Okay. Do you recall any discussions on "The
) .	02:59 19	Letterman Show" regarding promoting Rich Prosecco?
·	02:59 20	A Yes.
	02:59 21	Q Okay. And then just going through your
)	02:59 22	interrogatory answer, with "The Letterman Show" you have
	02:59 23	a 2004 HOUSE OF WAX. Do you recall anything about that?
	02:59 24	A Four years ago, but Yeah, I had I think
)	03:00 25	so. I'm just trying to remember. Yeah, on "David
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Case 1:08-cv-22261-FAM Document 68-5 Entered on FLSD Docket 03/20/2009 Page 19 of 22

Court Reporters

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03:27	1.	recall ever speaking to anyone about promoting PLEDGE
03:27	2	THIS! through the MTV/VH1 Radio?
03:28	3	A No.
03:28	4	Q Okay. Have you ever had
03:28	5	A MTV/VH1 Radio, they have a radio?
03:28	6	Q Have you ever had a bad experiences with MTV or
03:28	7	VH1?
03:28	. 8	A No.
03:28	9	Q Is MTV a media outlet that you would trust?
03:28	10	A Do I trust them?
03:28	11	Q Yes.
03:28	12	A Now I do because I have a show on their network.
03:28	13	Q I am going to try to save you some of the
03:29	14	research that you were going to try to do online, see if
03:29	15	we can do it here.
03:29	16	A Okay.
03:29	17	Q All right.
03:29	e 18	MR. WEINSTEN: These documents have been
03:29	9 19	produced in the case, or are you springing them on us for
03:29	9 2,0	the first time today?
03:2	9 21	MR. WEST: We pulled them off the Internet a
03:2	9 22	couple days ago.
03:2	9 23	MR. WEINSTEN: Okay. Why weren't they produced?
	24	THE WITNESS: I'm going to use the ladies' room
	25	again.

I don't know what date it was, but I'm carrying Α 1 03:47 shopping bags that say "aahs!" so most likely I was 2 03:47 there, yeah. 3 03:47 (Plaintiff Exhibit 28 was marked for 03:48 identification by the reporter and is 5 03:48 attached hereto.) 6 03:48 BY MR. WEST: 7 03:48 Showing you what's been marked as Exhibit No. 8 0 03:48 9 28, which is another printout from the Internet, do you 03:48 know if this accurately reflects that you were skydiving 1.0 03:48 over Boulder City on February 19th of 2007? 11 03:48 03:48 12 What's Boulder City? Were you in Nevada in --03:48 13 0 Α My birthday's February 17th, and I always do a 03:48 14 03:48 15 birthday in Vegas, and I did go skydiving in Vegas, so... 03:48 16 Was that 2007? Q Α Yes. 17 03:49 03:49 18 (Plaintiff Exhibit 29 was marked for identification by the reporter and is 03:49 19 attached hereto.) 03:49 20 21 BY MR. WEST: 03:49 Let me show you what's been marked as Exhibit 03:49 22 No. 29, which is a printout which I think is from a 03:49 23 different website called Paris Hilton Watch, and I'll ask 03:49 24 if you recognize any of the pictures in Exhibit 29. 03:49 25