

<p style="text-align: center;">[Page 2501]</p> <p>1 CLOSING - SHERBORNE</p> <p>2 presented.</p> <p>3 The first issue which your Lordship will need to decide,</p> <p>4 and one we say will not take you much time to do so, is the</p> <p>5 meaning of the article. The claimant's meaning is that</p> <p>6 Mr. Depp was guilty on overwhelming evidence of serious</p> <p>7 domestic violence —</p> <p>8 MR. JUSTICE NICOL: Let me just look at the pleadings.</p> <p>9 MR. SHERBORNE: Your Lordship will find them in file 1, tab 13.</p> <p>10 Does your Lordship have tab 13?</p> <p>11 MR. JUSTICE NICOL: I do.</p> <p>12 MR. SHERBORNE: If you turn to internal page -- perhaps it is</p> <p>13 easier if I tell your Lordship.</p> <p>14 MR. JUSTICE NICOL: Paragraph 10.</p> <p>15 MR. SHERBORNE: Paragraph 10. Just to make good what I said to</p> <p>16 your Lordship moments ago, there it says that "the claimant</p> <p>17 was guilty on overwhelming evidence of serious domestic</p> <p>18 violence against his then wife", and then these important</p> <p>19 words, "causing significant injury and leading to her fearing</p> <p>20 for her life, for which the claimant was constrained to pay no</p> <p>21 less than £5 million to compensate her, and which resulted in</p> <p>22 him being subjected to a continuing court restraining order,</p> <p>23 and for that reason he is not fit to work in the film</p> <p>24 industry."</p> <p>25 Just to make good what I said to your Lordship before</p>	<p style="text-align: center;">[Page 2503]</p> <p>1 CLOSING - SHERBORNE</p> <p>2 of them, some nothing to do with him -- who have come along to</p> <p>3 give their evidence and themselves be accused of lying for</p> <p>4 Mr. Depp. It was in one sweep by Ms. Wass, as she gave</p> <p>5 yesterday in her closing submissions, regardless of the fact</p> <p>6 that a number of them do not even work for Mr. Depp or do not</p> <p>7 have to rely on him for their livelihood, as they made plain</p> <p>8 in their evidence.</p> <p>9 Yes, we say, why else would Mr. Depp, this very private</p> <p>10 man as he explained, expose all the most intimate details of</p> <p>11 his personal life, even the very little privacy that he has</p> <p>12 managed to maintain despite his successful career as an actor?</p> <p>13 The point will not be lost on your Lordship any more than it</p> <p>14 is lost on those outside of this courtroom.</p> <p>15 As for the defendants, they could have just ignored</p> <p>16 Ms. Heard's claims, but they chose not to. They could have</p> <p>17 just reported them alongside Mr. Depp's position, but they</p> <p>18 deliberately decided not to do so. They chose instead, as I</p> <p>19 say, to convict Mr. Depp and that is what they seek to do in</p> <p>20 this court, to prove that this reputation-destroying</p> <p>21 career-ending allegation is true. That is what your Lordship</p> <p>22 is concerned about, true or not.</p> <p>23 So, as I say, that is the short answer as to why we are</p> <p>24 here, but there is also a longer answer, and it goes back</p> <p>25 beyond the article being published in 2018. It goes to May</p>
<p style="text-align: center;">[Page 2502]</p> <p>1 CLOSING - SHERBORNE</p> <p>2 about allegations which required some evidence to meet them,</p> <p>3 your Lordship will find them if you turn over the page to</p> <p>4 page 10. You will find a series of allegations relating to</p> <p>5 the way in which, as I say, the article was not properly</p> <p>6 researched and was presented in a wholly one-sided manner.</p> <p>7 There is no evidence at all from the defendants' journalists</p> <p>8 to meet that.</p> <p>9 As if that is not enough, your Lordship will see, and</p> <p>10 I ask you to read, paragraph 13.5 of the Particulars dealing</p> <p>11 with Ms. Kendall and the way in which she was misquoted</p> <p>12 because I will have things to say about that in due course.</p> <p>13 For the moment, that is the meaning which we ask your Lordship</p> <p>14 to find.</p> <p>15 Mr. Depp, as we say, was tried, convicted, and</p> <p>16 sentenced. That is what the article suggests. So the short</p> <p>17 answer is that we are all here because the newspaper, and</p> <p>18 Mr. Wootton, chose to publish this extremely serious</p> <p>19 allegation, an allegation which Mr. Depp says, and has always</p> <p>20 said, is completely untrue. Not only that, they have</p> <p>21 persisted in saying that it is true, and I will have more to</p> <p>22 say about that in due course. That is why Mr. Depp is</p> <p>23 bringing this claim for libel, subjecting himself to this</p> <p>24 painful public process, because he knows it is untrue, as do</p> <p>25 all the people from various walks of his life -- friends, some</p>	<p style="text-align: center;">[Page 2504]</p> <p>1 CLOSING - SHERBORNE</p> <p>2 27th, 2016, to a scene we have watched on the screen before</p> <p>3 you, to Ms. Heard outside a courtroom in Los Angeles,</p> <p>4 surrounded by paparazzi photographers and the media, and</p> <p>5 sporting rather visible bruises. That is when her story</p> <p>6 started, as far-fetched as we say it has proved to be, when</p> <p>7 she first decided to tell the world that Mr. Depp was a</p> <p>8 wife-beater. It is hard to think of a more public way to do</p> <p>9 this, however much she protested to the contrary. She has set</p> <p>10 herself up ever since as an advocate of the #MeToo movement,</p> <p>11 and in the process, we say, she has picked up her theme and</p> <p>12 run with it. New allegations of domestic violence have</p> <p>13 tumbled out over the years, new twists to those allegations</p> <p>14 and even more in the last few days before trial and in this</p> <p>15 courtroom as she gave her evidence, particularly in</p> <p>16 re-examination. It is hard to keep up with them. Even the</p> <p>17 defendants have not pursued many of the most recent ones,</p> <p>18 quite what your Lordship is meant to do about that I cannot</p> <p>19 say. You can imagine though how Mr. Depp feels about it,</p> <p>20 given that some of them were not even put to him.</p> <p>21 So, the longer answer as to why we are here is because</p> <p>22 Ms. Heard has chosen to tell the whole world about her</p> <p>23 allegations of domestic violence. This is nothing to do with</p> <p>24 Mr. Depp's supposed PR machine or his supposed influence in</p> <p>25 Hollywood. This is because Ms. Heard has wanted to tell her</p>

[3] (Pages 2501 to 2504)

[Page 2505]

1 CLOSING - SHERBORNE
 2 story. On any view, we say, Ms. Heard is a complex
 3 individual, with a complex history, medical, emotional, as she
 4 described to the professionals who looked after her. Why has
 5 she chosen to publicise her claims is really not something
 6 that this court needs to answer, because this claim is not
 7 brought against Ms. Heard; it is brought against The Sun
 8 newspaper and Mr. Wootton.

9 Turning to what your Lordship needs to decide, as you
 10 have said on more than one occasion, and with respect rightly,
 11 this court needs to decide whether the allegation that
 12 Mr. Depp is guilty of serious physical assaults on Ms. Heard,
 13 causing her significant injuries, is true or not.

14 MR. JUSTICE NICOL: Just a minute. (Pause) Yes.

15 MR. SHERBORNE: There is a little more to it than that, let me
 16 explain. First of all, the burden of proof is obviously on
 17 the defendants. They need to convince your Lordship that the
 18 allegation is true. Now, given that this is to all intents
 19 and purposes an allegation of criminality, serious
 20 criminality, the court has always required a higher degree of
 21 proof.

22 MR. JUSTICE NICOL: Just a minute. (Pause)

23 MR. SHERBORNE: I understand your Lordship wants to take a note
 24 and I am not trying to dissuade your Lordship, but just for
 25 your Lordship's reassurance, this is dealt with in our closing

[Page 2507]

1 CLOSING - SHERBORNE
 2 with, but if your Lordship wants me to address it later,
 3 I will do. As I say, the authorities are very clear on this.
 4 The reason why cogent and compelling evidence is used is
 5 because it is effectively a way of ensuring that the
 6 presumption of innocence is not trampled over, even in civil
 7 cases where, of course, as you are here, dealing with a
 8 serious criminal allegation. As I say, it is of particular
 9 importance in a case such as this, where there are two
 10 diametrically opposed accounts, one side is obviously lying
 11 and one side is telling the truth.

12 Critically, for all bar one of the alleged incidents,
 13 the acts of physical violence which the defendants are
 14 required to prove rely entirely on the account given by
 15 Ms. Amber Heard. Other than the alleged incident in March
 16 2015, at the top of the stairs, in penthouse 3 of the Eastern
 17 Columbia Building, which her sister Whitney is meant to have
 18 witnessed. I will have more to say about Ms. Whitney Heard's
 19 evidence and its reliability in due course. Suffice to it say
 20 for the moment that she has proven herself, as we say, willing
 21 to lie to this court on oath in order to protect her big
 22 sister, not once, but on a number of occasions. She plainly
 23 tailored her evidence to meet the changes which Ms. Heard had
 24 been forced to make to her story, with one eye, at all times,
 25 on her big sister throughout her testimony, both

[Page 2506]

1 CLOSING - SHERBORNE
 2 skeleton as you will see.
 3 The way in which the court has required a higher degree
 4 of proof has been expressed in different ways in different
 5 cases. It comes down to this: this court requires compelling
 6 and cogent evidence before it will find that an allegation
 7 that someone is guilty of a serious criminal offence is true;
 8 evidence which is clear, consistent and forceful. Why is this
 9 so important? Well, as the authorities recognise, it is
 10 effectively the operation of the cornerstone principle of the
 11 presumption of innocence. The Sun may have forgotten that;
 12 Mr. Wootton, the author of the article, may have forgotten
 13 that it appears; but your Lordship will not. It is of
 14 particular importance in a case such as this.

15 MR. JUSTICE NICOL: The presumption of innocence is important
 16 because someone ought not to be convicted of a criminal
 17 offence unless they are proved to be guilty to the requisite
 18 standard.

19 MR. SHERBORNE: My Lord, yes.

20 MR. JUSTICE NICOL: I am not deciding, I am not charged with
 21 convicting anybody.

22 MR. SHERBORNE: My Lord, if you look, for example, I think it is
 23 Eady J in the Lillie & Reed case, it is in our closing
 24 skeleton, there are a number of authorities. I will not take
 25 time, if you do not mind, just because there is a lot to deal

[Page 2508]

1 CLOSING - SHERBORNE
 2 metaphorically and as we observed quite literally. Put
 3 bluntly, this one individual said to be a witness for Mr. Depp
 4 supposedly attacking Ms. Heard is a witness that this court
 5 simply cannot trust.

6 As to the evidence given by Ms. Heard's small and
 7 supportive group of friends, the ones that is who have stuck
 8 by her, or her story, it is almost entirely based on what
 9 Ms. Heard has herself told them and is little more than
 10 hearsay. Certainly, up until the staged events of 21st May
 11 2016.

12 MR. JUSTICE NICOL: Just a minute. (Pause).

13 MR. SHERBORNE: We say that they have been drawn into supporting
 14 her account, even at the cost of lying to this court, whether
 15 because they want to please her or because of the exercise of
 16 control which she seems to have; as other witnesses have
 17 testified to, with whom she came into contact. After all, as
 18 she said in a text message sent by her to her friends from
 19 Mr. Depp's phone in August 2014, to which I will take this
 20 court in due course, "This is Amber", she says, "and I get
 21 what I want." A message which we say represents a powerful
 22 reminder of what so much of this case is about.

23 For these reasons, your Lordship will need to scrutinise
 24 the evidence of Ms. Heard with considerable care and assess
 25 her credibility since so much depends on it. The defendants

[4] (Pages 2505 to 2508)



1	yellow bellied?	14:17:39
2	A No, I didn't consider Jerry Bruckheimer	14:17:41
3	to be yellow --	14:17:46
4	Q Did you consider Sean Bailey to be yellow	14:17:46
5	bellied?	14:17:50
6	A Yeah.	14:17:50
7	Q Why?	14:17:50
8	A Because he wasn't man enough to --	14:17:52
9	listen, I was involved in five films in that series	14:17:59
10	of Pirates of the Caribbean, and I was very lucky	14:18:06
11	to be a part of that, and I was very happy -- I'm	14:18:10
12	happy still that I was a part of that because I	14:18:14
13	have a character that has made a lot of people	14:18:16
14	smile and happy, and that gives me great pleasure,	14:18:20
15	but when -- when these people, who have made	14:18:26
16	upwards of four, five, six, seven billion, eight	14:18:35
17	billion dollars on a ration of films that you've	14:18:42
18	done for them and your character is on the ride in	14:18:49
19	Disneyland in three different spots and in Shanghai	14:18:58
20	and in Orlando and all over the place, I've found	14:19:02
21	it fascinating that not one call.	14:19:06
22	Nobody was man enough to give me the boot	14:19:09

1 based on allegations, and -- but it was still okay 14:19:14
2 to leave the supposed wife-beater on the rides, and 14:19:24
3 it's still okay for them to sell merchandise of the 14:19:31
4 supposed wife-beater, and they can still sell 14:19:35
5 action figures of the supposed wife-beater. They 14:19:40
6 haven't taken me off their rides. So I would say 14:19:44
7 that something's rotten in the state of Denmark. 14:19:50
8 Q Do you know for sure that you are not 14:19:55
9 going to be part of Pirates 6? 14:19:58
10 A Without question. 14:20:00
11 Q And is that based only on the article 14:20:02
12 that came out sometime after the op ed? 14:20:05
13 MR. CHEW: Objection to form of the 14:20:08
14 question. I think it misstates the testimony, but 14:20:13
15 you may answer. 14:20:16
16 A I don't -- I don't recall the dates of 14:20:17
17 what went first, how this all went down. I'm 14:20:23
18 sorry, your question again? 14:20:30
19 Q Do you know for certain -- 14:20:32
20 A Right. 14:20:33
21 Q -- that you are not on Pirates 6? 14:20:34
22 A Oh, that I said yes, no. 14:20:36

1 Q And then I said is that -- 14:20:38

2 A Correct.

3 Q -- based on the article in the newspaper 14:20:40

4 sometime shortly after the op ed from Amber Heard. 14:20:43

5 A Yes, I believe it's from that, and I 14:20:49

6 believe it's from the global barrage of -- of 14:20:52

7 fraudulent claims against me that -- that have 14:20:59

8 flown throughout the world on this thing called the 14:21:04

9 internet and in various magazines and all that. As 14:21:11

10 I've stated earlier, things that she said, did, 14:21:18

11 yeah, I believe of course, there was no way they 14:21:28

12 were going to let me in Pirates -- they were going 14:21:35

13 to bring me into Pirates 6 if someone's out there 14:21:38

14 screaming about you being this horrible human being 14:21:42

15 and then the press backs it up and sells it to you, 14:21:44

16 sells it, you know? 14:21:49

17 Q So you assume that because of everything 14:21:51

18 that's been continuing on in these allegations, 14:21:54

19 that you're not going to be in Pirates 6? 14:21:58

20 MR. CHEW: Objection to the form of the 14:22:00

21 question. It misstates the testimony. 14:22:02

22 A I can tell you the God's honest truth 14:22:05

1 right now, based on everything, if they came to me 14:22:08
2 with \$300 million and a million alpacas, nothing 14:22:10
3 under this earth, on this earth would get me to go 14:22:21
4 back and work with Disney on a Pirates of the 14:22:26
5 Caribbean film. 14:22:29

6 Q Okay, thank you. If -- in your 14:22:30
7 complaint, you said at paragraph 5, quote, "Mr. 14:22:40
8 Depp's reputation and career were devastated when 14:22:45
9 Ms. Heard first accused him of domestic violence on 14:22:50
10 May 27, 2016," end of quote. In what way was your 14:22:53
11 career devastated at that point? 14:23:01

12 MR. CHEW: Excuse me. Which complaint 14:23:03
13 are you referring to? 14:23:04

14 MS. CHARLSON BREDEHOFT: His complaint. 14:23:05

15 MR. CHEW: Could you show it to him? 14:23:06

16 MS. CHARLSON BREDEHOFT: No, I don't need 14:23:08
17 to show it to him. I just quoted it. 14:23:09

18 MR. CHEW: You don't need to show him a 14:23:11
19 document you're asking him about? 14:23:13

20 BY MS. CHARLSON BREDEHOFT: 14:23:15

21 Q That's correct, I absolutely don't have 14:23:15
22 to. I'm asking him what his -- was your career in 14:23:16

1 geez, what's the word count and all that? I don't
2 need it. It's now -- this -- is it public, this
3 right here, his -- his decision?

4 Q You don't get to ask me a question, but I
5 did ask you, you're aware that it's public.

6 A Ah, that's a good --

7 Q So --

8 A Well --

9 Q If it had been in your favor, you
10 would've agreed with him and thought he was right
11 and have been thrilled with his decision, wouldn't
12 you?

13 MR. CHEW: Objection to the form of the
14 question, calls for speculation, but you may
15 answer.

16 BY MS. CHARLSON BREDEHOFT:

17 Q You would have believed you were
18 vindicated, would you not?

19 MR. CHEW: Objection to the form of the
20 question. It's a hypothetical question to a fact
21 witness.

22 A I'm going to say the same thing that I

1 suggest that Elon Musk is financing or behind Amber 17:02:04
2 Heard claiming that she has been domestically 17:02:10
3 abused and violent -- and the victim of domestic 17:02:14
4 violence by you? 17:02:19

5 MR. CHEW: And just to be clear, Johnny, 17:02:20
6 you cannot answer that if the information came from 17:02:21
7 your counsel. 17:02:25

8 A It's not going to be answered. It can't 17:02:26
9 be answered. 17:02:28

10 Q So the answer would be no, you have 17:02:29
11 nothing other than communications with counsel; is 17:02:31
12 that correct? 17:02:34

13 A Yes. 17:02:34

14 Q So let's go back. Do you have any 17:02:35
15 evidence of even a dollar that Amber Heard has made 17:02:43
16 based on the fact that she has come forward and 17:02:47
17 said she's the victim of domestic abuse and 17:02:50
18 violence by you? 17:02:53

19 MR. CHEW: Objection, asked and answered, 17:02:54
20 calls for speculation, but you may answer one last 17:02:56
21 time. 17:02:59

22 A You want to know if I have proof of that. 17:02:59

1	No, I can't say that I do. I haven't really	17:03:02
2	checked in with her.	17:03:04
3	Q Do you have any evidence at all that	17:03:05
4	Amber Heard has received any kind of movie role or	17:03:08
5	opportunity as a result of saying -- coming forward	17:03:13
6	and saying that she was the victim of domestic	17:03:17
7	violence and abuse by you?	17:03:19
8	A I don't know the answer to that.	17:03:21
9	Q All right. What do you think your	17:03:27
10	reputation is today?	17:03:33
11	MR. CHEW: Objection. That's vague and	17:03:34
12	ambiguous.	17:03:35
13	THE WITNESS: That's --	17:03:36
14	MR. CHEW: Objection to the form of the	17:03:37
15	question, vague and ambiguous.	17:03:38
16	BY MS. CHARLSON BREDEHOFT:	17:03:40
17	Q You have contended that you are damaged	17:03:40
18	in your complaint, your reputation is damaged.	17:03:42
19	What is your reputation --	17:03:46
20	MR. CHEW: Objection to the form of the	17:03:48
21	question.	17:03:49
22	BY MS. CHARLSON BREDEHOFT:	17:03:50

1 did yesterday to you, and I hope -- I hope this
2 makes sense. Whether Justice Nicol saw things in
3 favor of my case against The Sun or not, whether
4 this case, wherever this may land us, let's say, if
5 -- if I won every case, if I won every little
6 trinket or whatever, I still will lose -- I've
7 still lost, and that started April 22nd and then
8 the last time I saw her in May or whatever it was
9 or --

10 Q 2016.

11 A Somewhere. I've still lost, you
12 understand, because I will carry this with me,
13 baggage, the baggage of it, the accusations.
14 Whether I win or whether I'm deemed some kind of
15 horrible creature that should be locked in a jail
16 cell or in a tomb or whether I'm king of the
17 universe, I've lost. I've already lost by the
18 damage done. So my continuing my search for the
19 truth, my continuing to demand the truth is not for
20 me to win, but it's for the people out there, the
21 women, the victims of this type of thing who are
22 not believed, who are being lied to by your client

1 pretending to be some new messiah of the women's
2 movement. She is a fraud. Anything else? So if I
3 can help other people by continuing, I certainly
4 will now.

5 MR. CHEW: This is 11? Thank you.

6 (Deposition Exhibit Number 11 was marked
7 for identification.)

8 THE WITNESS: Thank you.

9 BY MS. CHARLSON BREDEHOFT:

10 Q I want to show you what has been marked
11 as Deposition Exhibit Number 11, and this is an
12 article in February 2019 talking about a lawsuit
13 that was brought in May of 2018 by two of your body
14 guards, Eugene Arreola and Miguel Sanchez.

15 A Yes, ma'am.

16 Q Do you see that?

17 A Yes, ma'am.

18 Q And if you could move down to the bottom
19 of the first page, this is an article about it from
20 Blumenthal et cetera. BNBD is easier than saying
21 all those names.

22 MR. CHEW: And De Blouw.

1	rely on my counsel to alert me to those -- those	12:41:06
2	things.	12:41:12
3	Q And do you understand in this lawsuit,	12:41:12
4	you have the burden of proof to prove that it's	12:41:15
5	false?	12:41:20
6	A All right.	12:41:21
7	Q Do you understand that?	12:41:21
8	MR. CHEW: Objection to the form of the	12:41:23
9	question to the extent -- well, clearly it calls	12:41:24
10	for a legal conclusion.	12:41:27
11	A The burden of proof is on me to prove	12:41:28
12	that it's false. Well --	12:41:34
13	Q I'm just asking if you understand that.	12:41:38
14	A I walk into this case with what I walked	12:41:41
15	into the other case with, and that's the truth, and	12:41:45
16	the outcome is the outcome is the outcome. I can't	12:41:47
17	-- I have nothing to do with that. I can only	12:41:51
18	speak my truth and hope that justice will in fact	12:41:57
19	prove that Ms. Heard was not ever touched, abused	12:42:07
20	by me in any way, shape or form. That's -- that is	12:42:16
21	the truth.	12:42:24
22	Q If you view the decision in the U.K. as	12:42:25

1 an opinion of one man and we go to trial by the 12:42:29
2 jury and the jury decides in favor of Amber Heard, 12:42:34
3 is your decision -- is your position going to be 12:42:39
4 that's the opinion of seven people? 12:42:44

5 MR. CHEW: Objection to the form of the 12:42:46
6 question. It's a hypothetical question to a fact 12:42:47
7 witness and it's argumentative. 12:42:50

8 A No, I'm not going to say that's the 12:42:54
9 opinion of seven people. Listen, it can be the 12:42:56
10 opinion of one man, it can be the opinion of 200 12:43:01
11 people, it can be the opinion of a thousand people, 12:43:04
12 and they could believe that I did do these things, 12:43:07
13 which I did not take part in any of what Ms. Heard 12:43:12
14 accuses me of. It is outright fiction, therefore, 12:43:16
15 I -- I can only hope that people will hear the 12:43:24
16 truth and understand it to be the truth, but I 12:43:28
17 don't think that the -- the young soldiers who were 12:43:33
18 storming the beaches at Normandy -- I don't think 12:43:39
19 they were saying hey, let's have pizza tonight. I 12:43:43
20 think that they knew what they'd gone into. 12:43:48

21 So what I'm saying is if -- if this does 12:43:52
22 come out, the decision in this particular case 12:43:56

1 comes out in Mrs. -- Ms. Heard's favor, then that 12:44:03
2 is what will happen, but that's not going to make 12:44:07
3 me go oh, my God, I must have done it. Do you 12:44:11
4 understand? 12:44:15

5 Q All right, so you're not going to get 12:44:16
6 what you're seeking anyway. You're not going to 12:44:17
7 get -- 12:44:20

8 MR. CHEW: Object. 12:44:21

9 A I told you already, I can go through this 12:44:21
10 case, and if it's -- if it goes in my favor and the 12:44:24
11 truth is -- it comes out, I think that what that 12:44:30
12 will do will help the people out there, the women 12:44:33
13 out there to -- to not have to listen to someone 12:44:40
14 who's built a foundation, some foundation that they 12:44:55
15 can stand on, a platform, and then use that 12:44:59
16 platform to further their image as this great 12:45:02
17 savior and public speaker and an ambassador to this 12:45:07
18 or that or this or that. Clearly those are her 12:45:11
19 goals, and I -- I am not going to be the 12:45:17
20 springboard that gets her there based on her lies. 12:45:22

21 Q You've asked in your complaint to be 12:45:26
22 awarded all expenses and costs, including 12:45:29

VIRGINIA:

IN THE CIRCUIT COURT OF FAIRFAX COUNTY

JOHN C. DEPP, II,

Plaintiff and Counter-defendant,

v.

AMBER LAURA HEARD,

Defendant and Counter-plaintiff.

Civil Action No.: CL-2019-0002911

**DEFENDANT'S EXHIBITS
SUPPLEMENTAL PLEA IN BAR**

01-19-2911

7/22/2021

PSA/jna

Jury
Supp. PIB

John C. Depp II (Benjamin Chew)

vs.

Amber Kama Heard (Elaine Bredehoff)

C/R:V

Argument

Joshua Tubbs

Planet Depos

1.A.

Exhibits

- Adm 1. Core trial bundle index
- 2. 1st set of document ref.
- 3. 2nd set of document ref.
- 4. 1st set of interrogatories
- 5. 2nd set of interrogatories
- 6. 1st ref. for admission
- 7. 1st designation / ID of expert witnesses
- 8. 2nd witness statement
- 9. transcripts
- 10. transcripts
- 11. transcript

Not Adm 12.

- photo - arm
- photos - mirror / writing (2)
- photos - mouse / clothes (2)
- photos - Amber Heard (-)
- photos - Amber Heard (2)
- Planet Depos transcripts 9.18.2020



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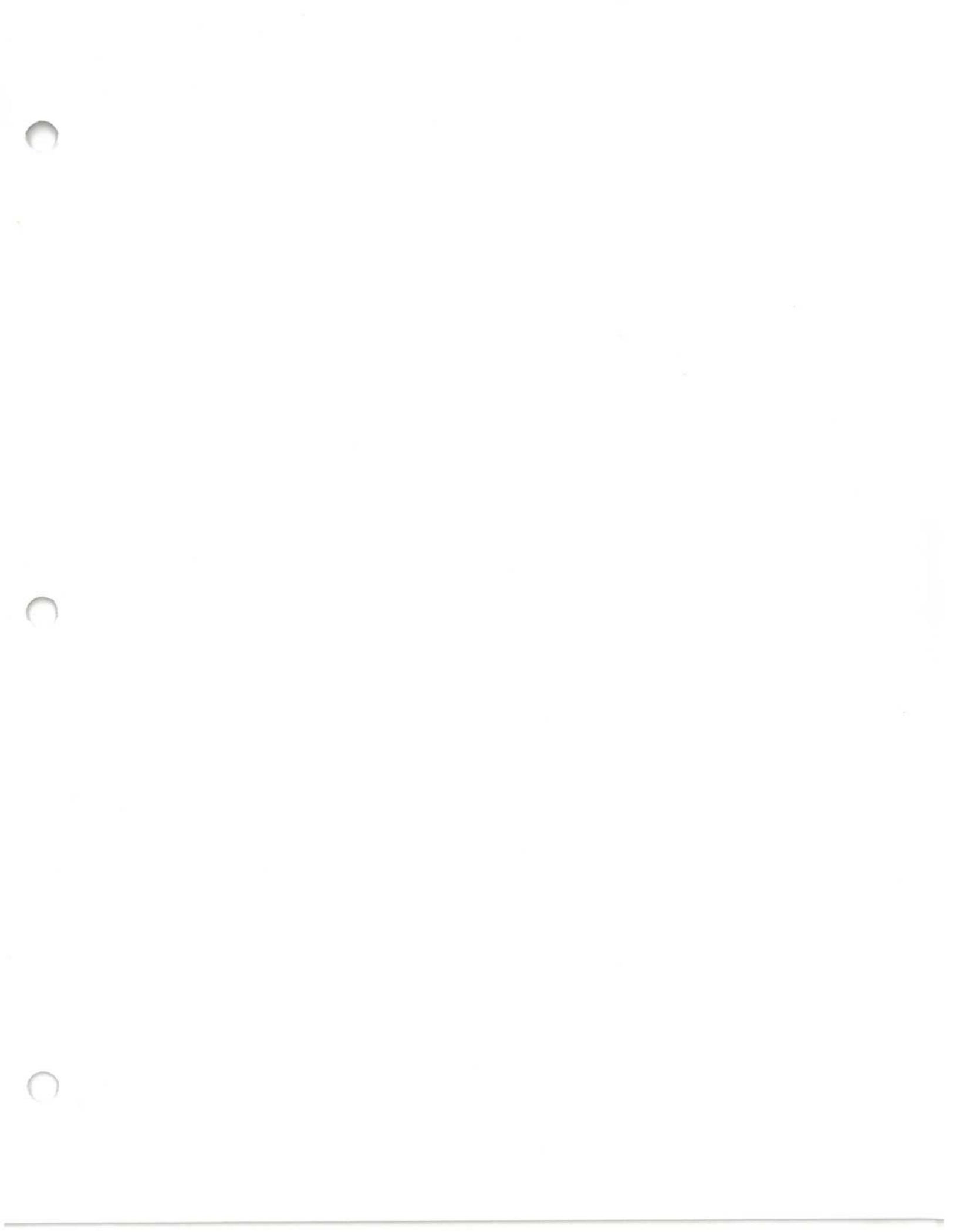
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Plt. Def. CW. 12
Date 7-22-2021
Judge
Case # CL-19-2911
NOT ADM

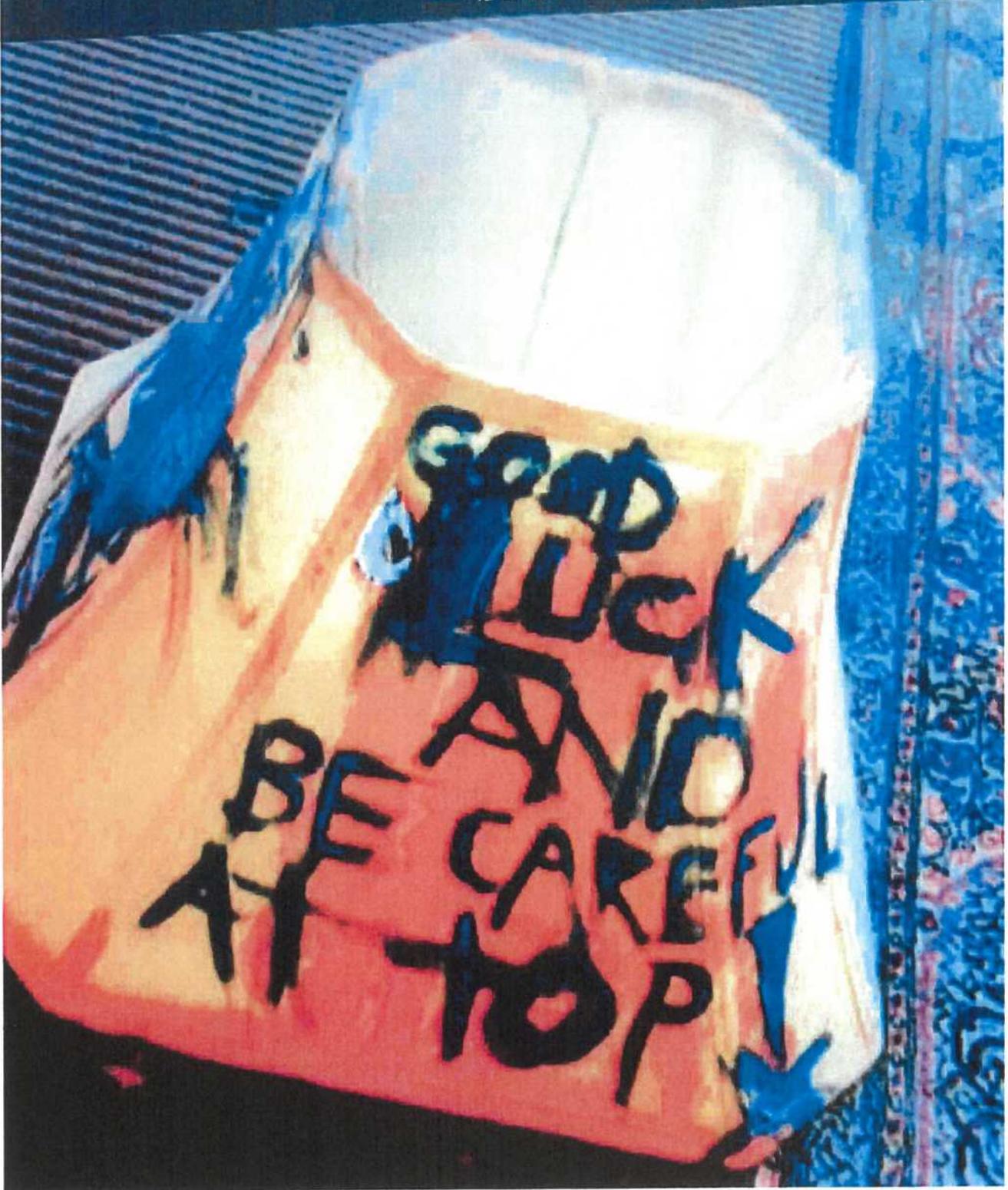




Plt. Def. CW. 13
Date 7.22.2021
Judge _____
Case # (L-19-291)
NVT Adm

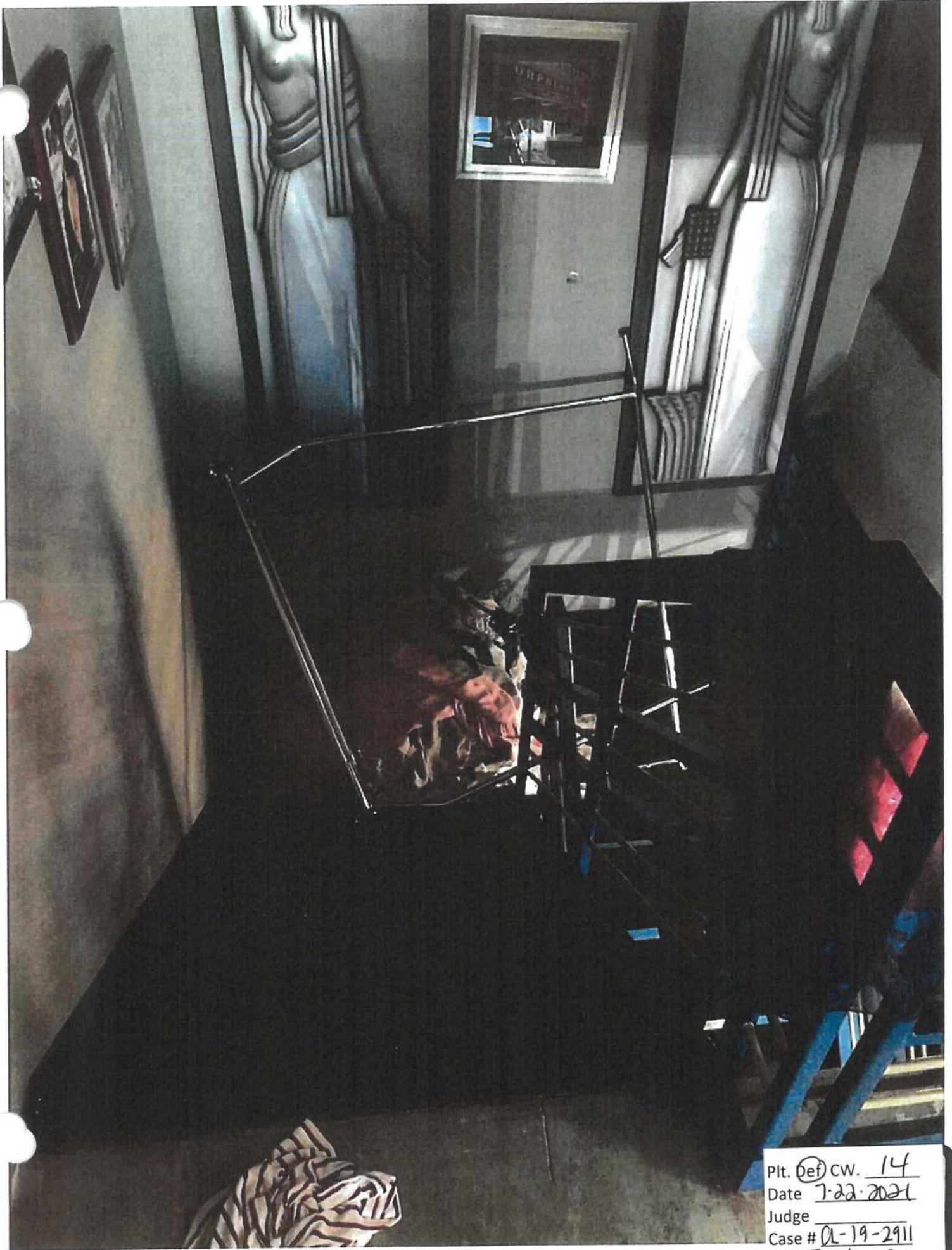
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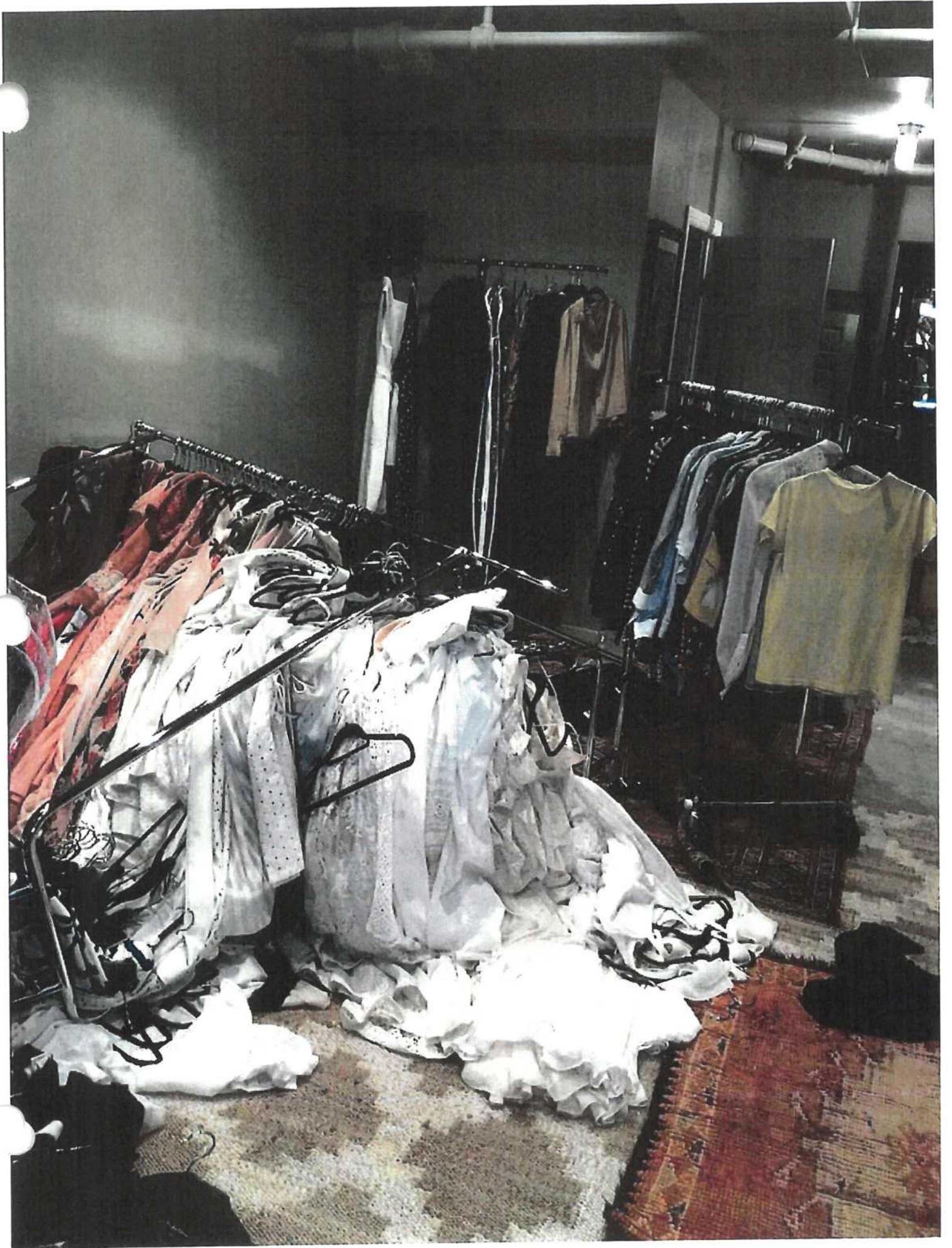


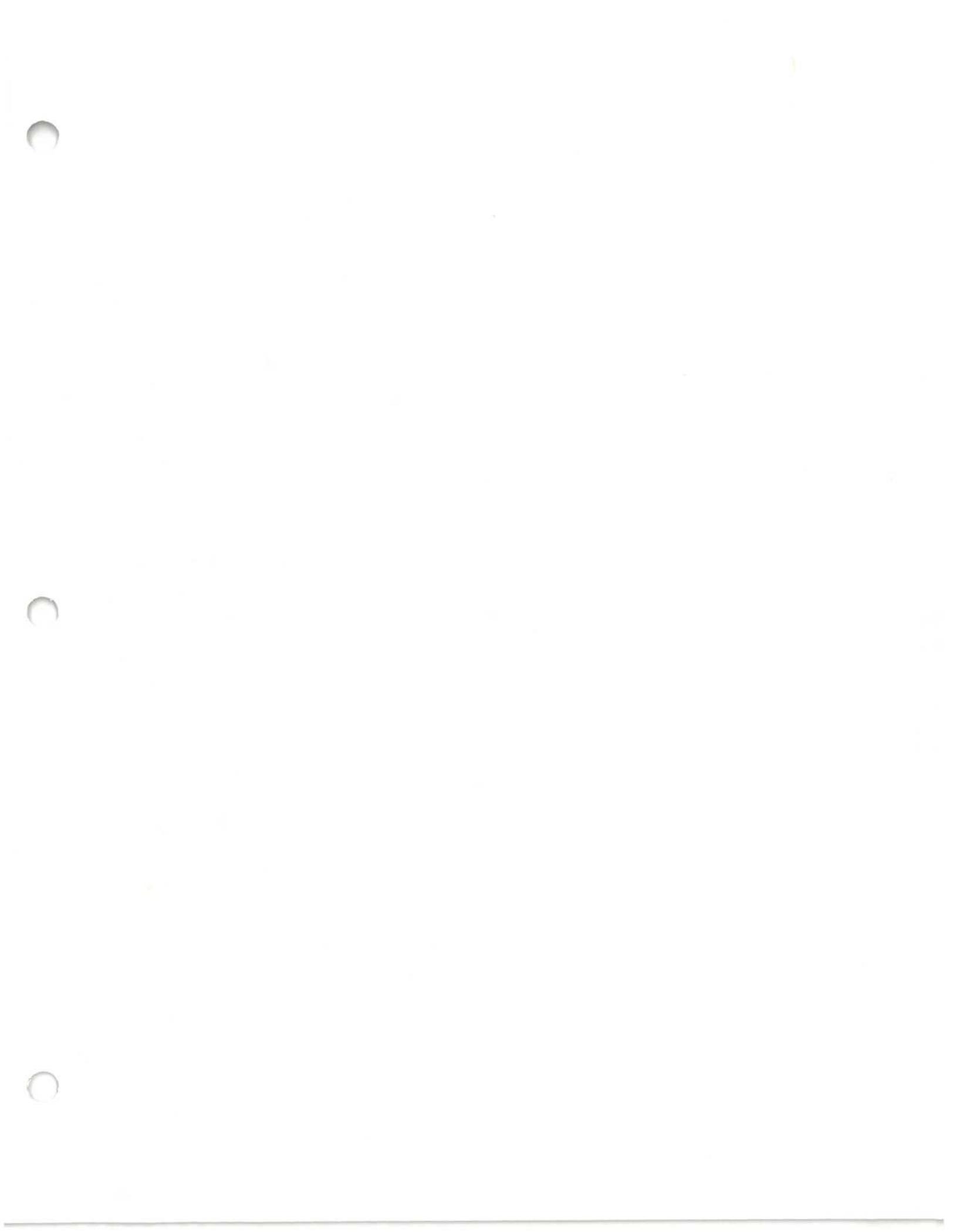
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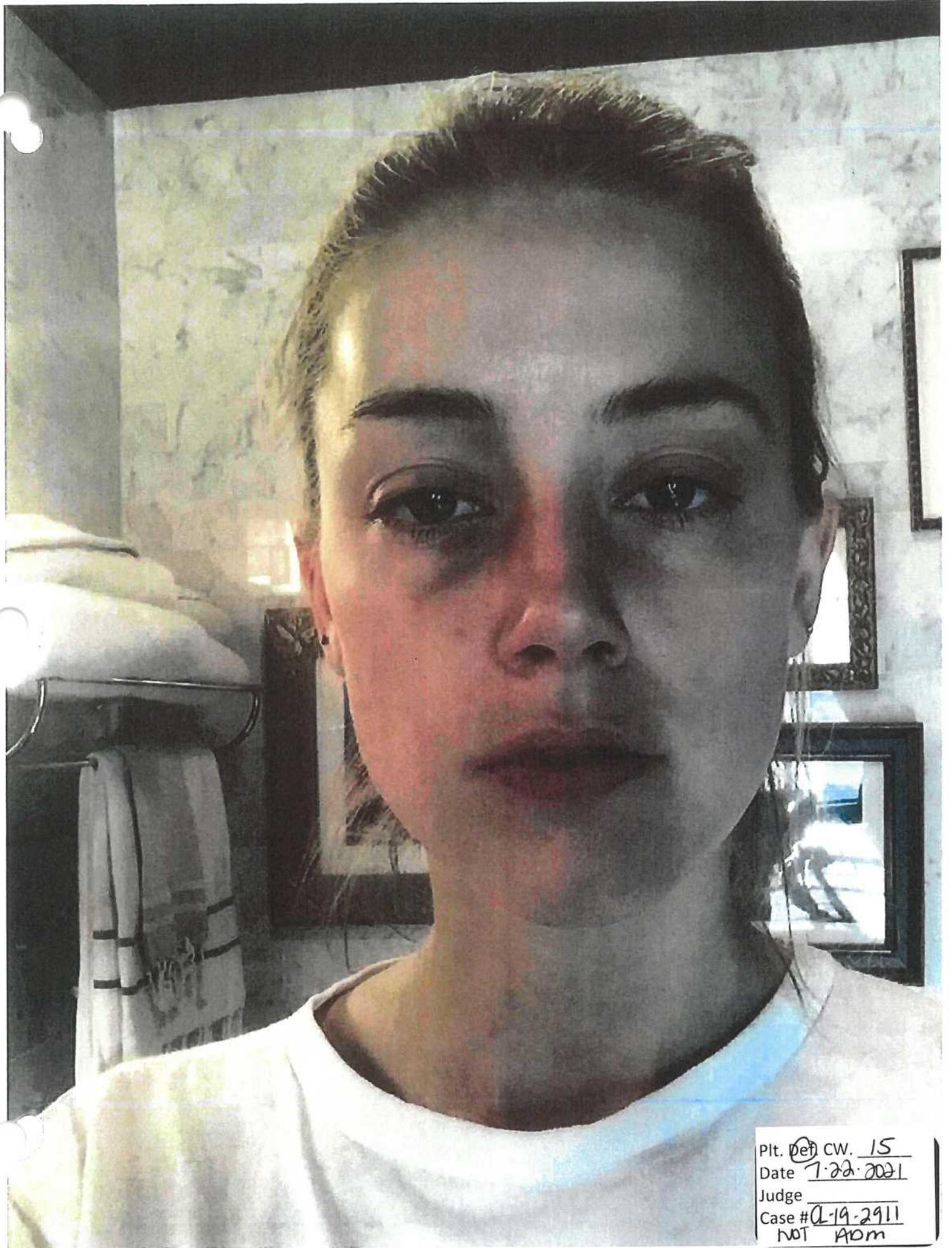




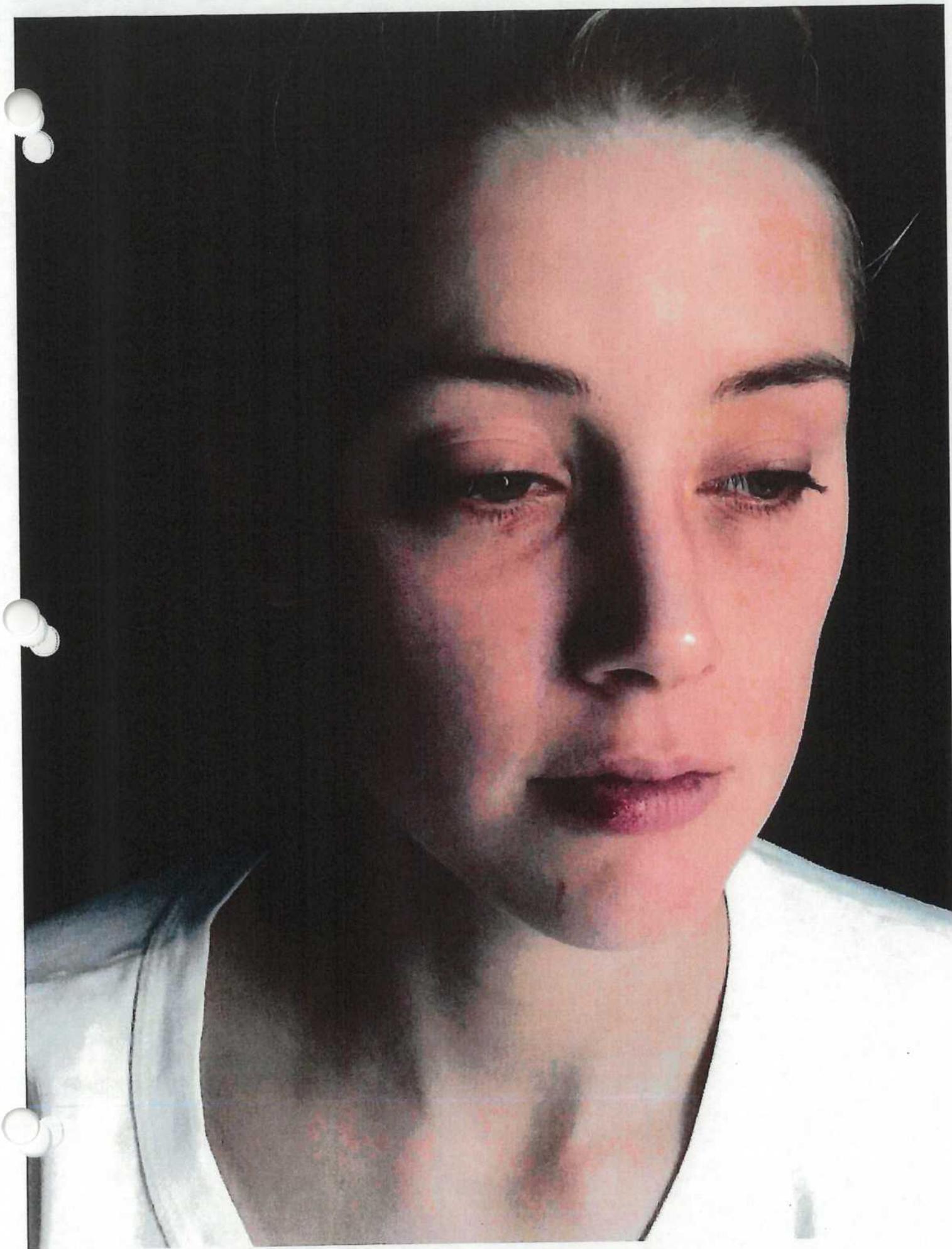
Plt. Def CW. 14
Date 7-22-2021
Judge
Case # 02-19-2911
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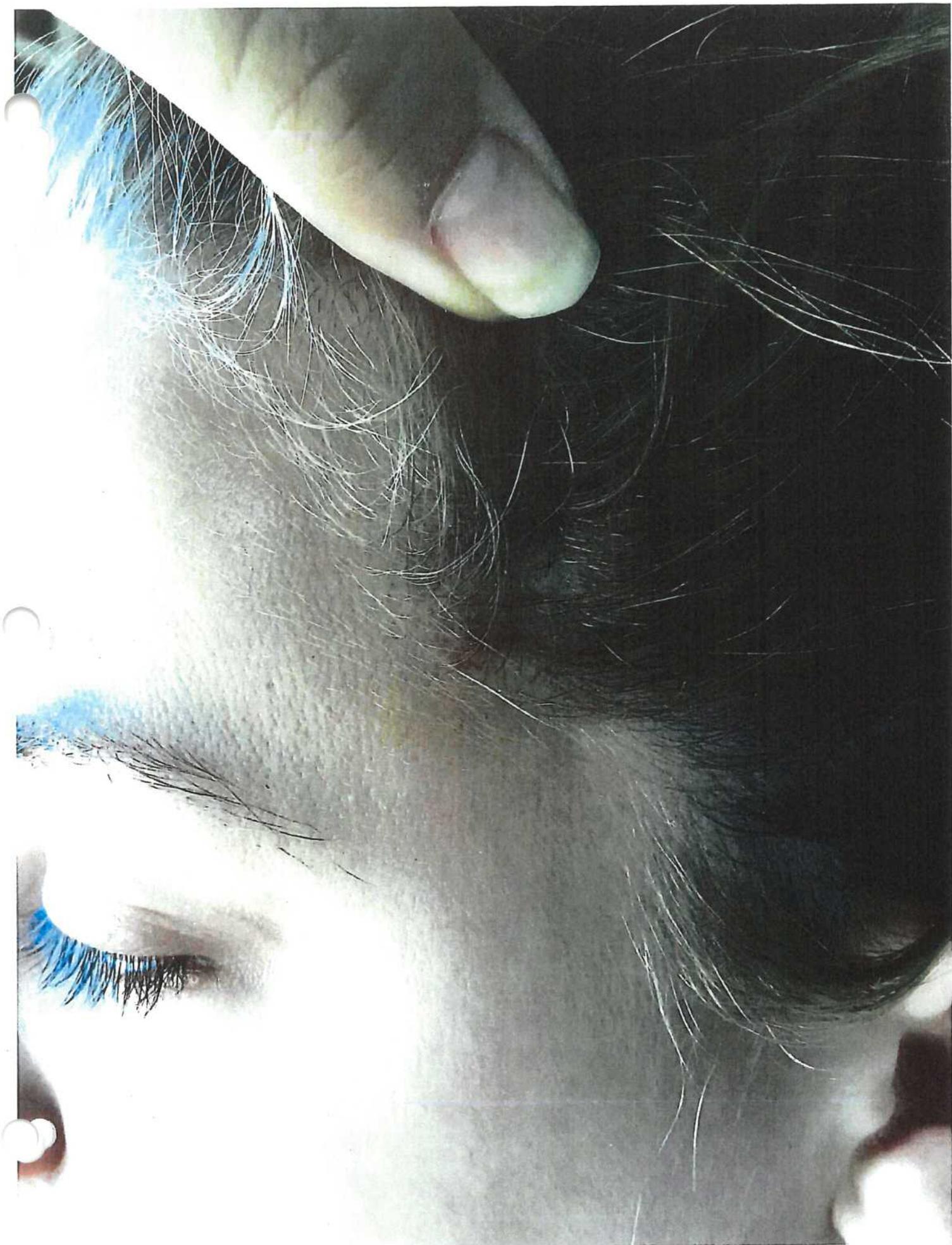


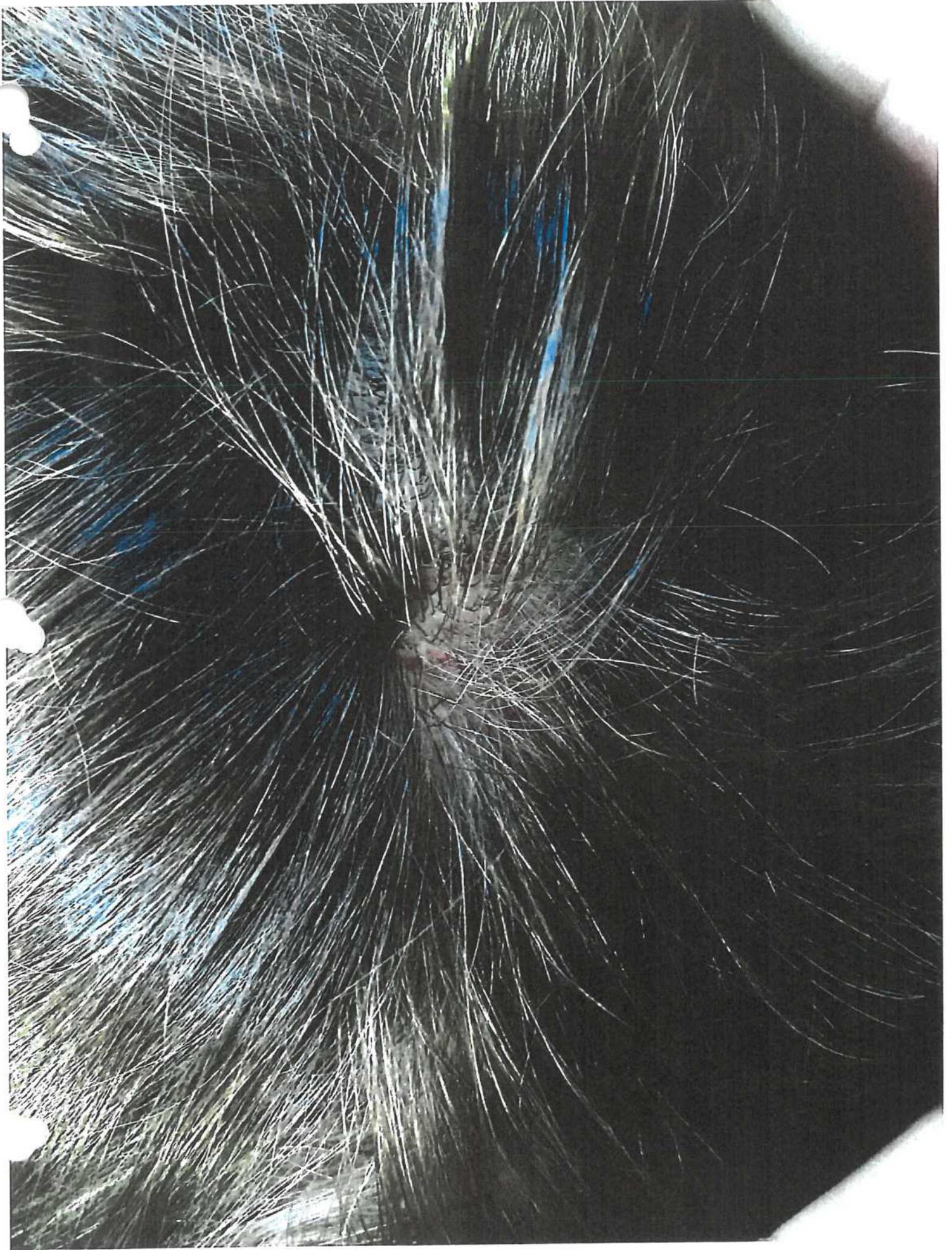




Plt. Def CW. 15
Date 7-22-2021
Judge _____
Case # Q-19-2911
NOT ADM





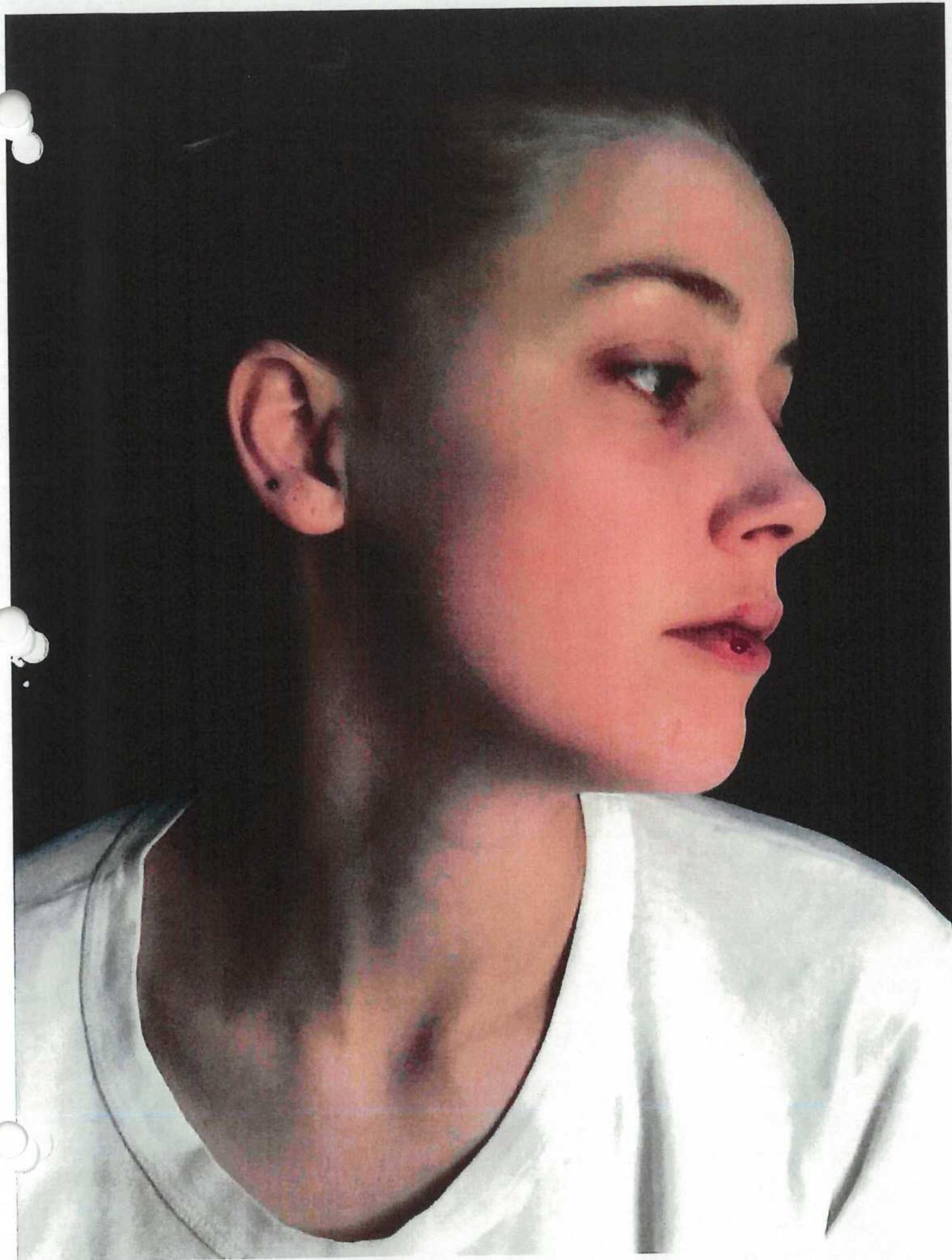


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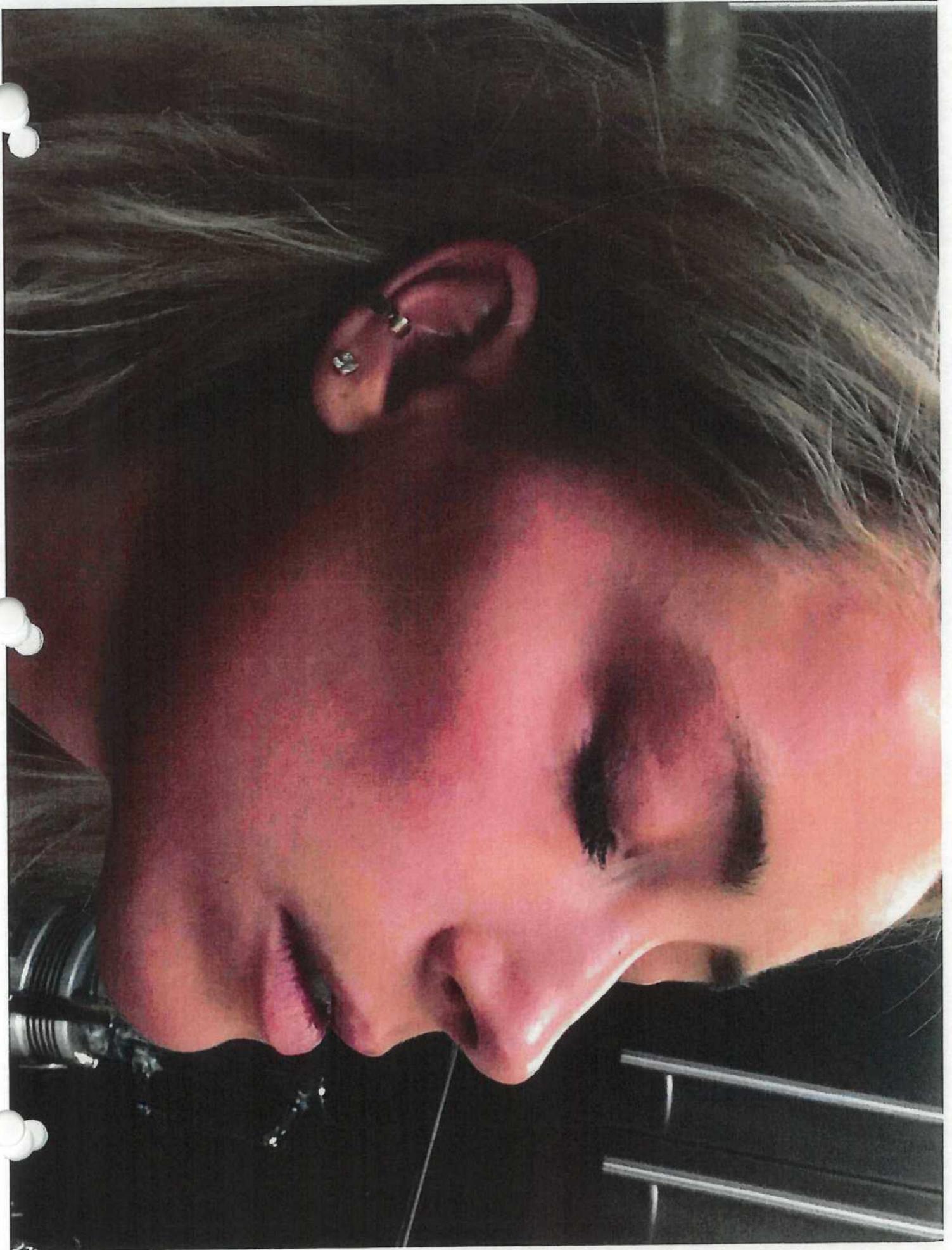


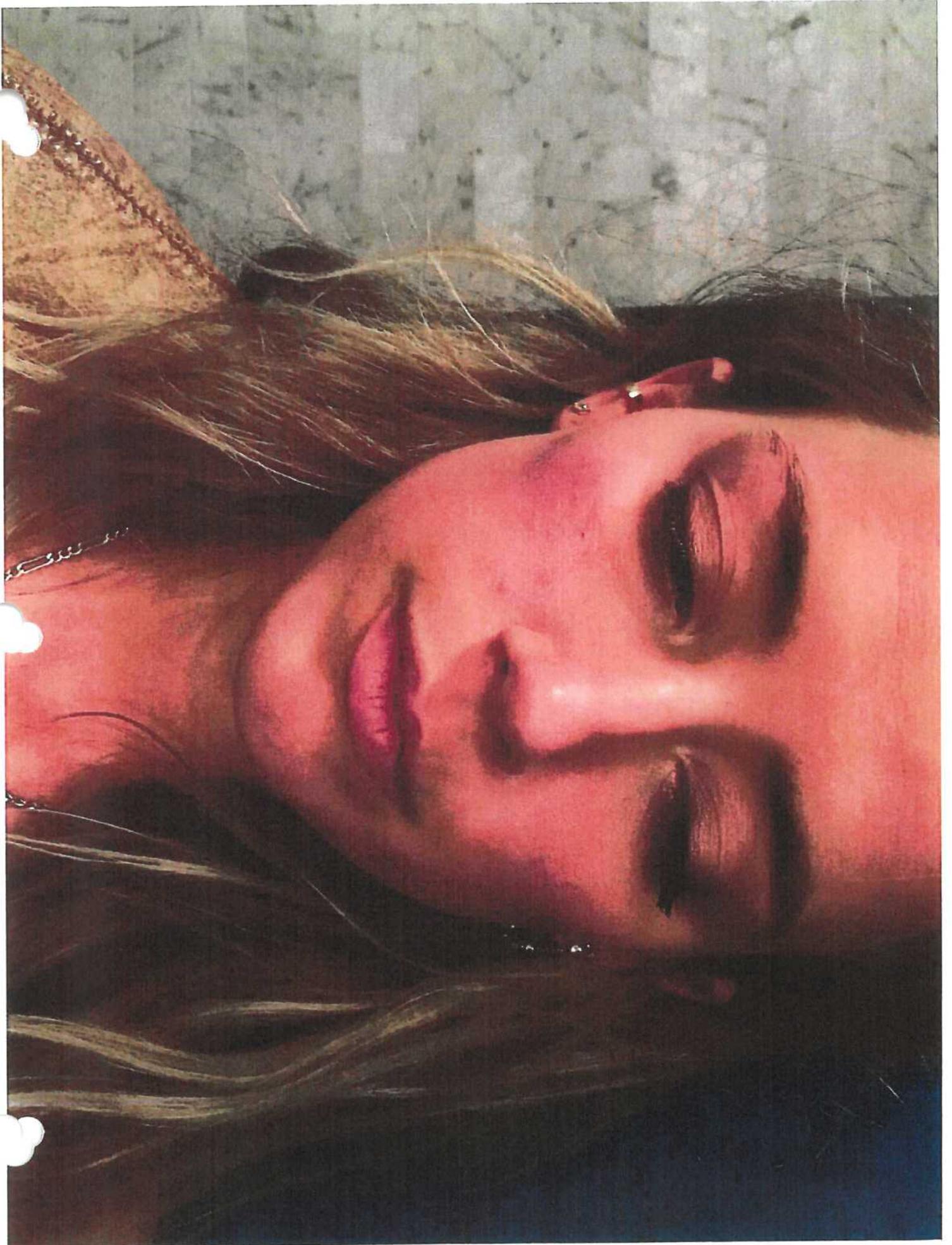


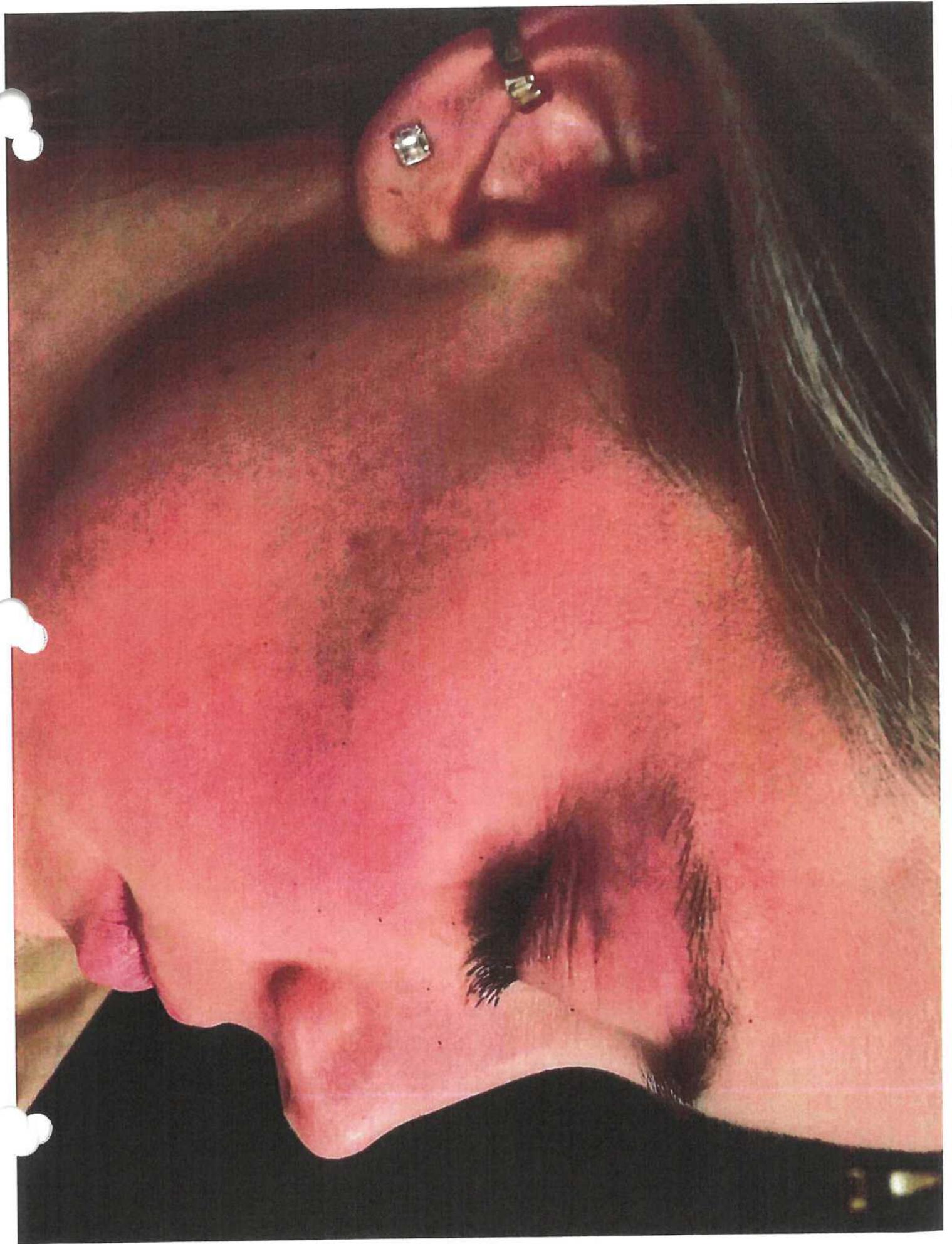




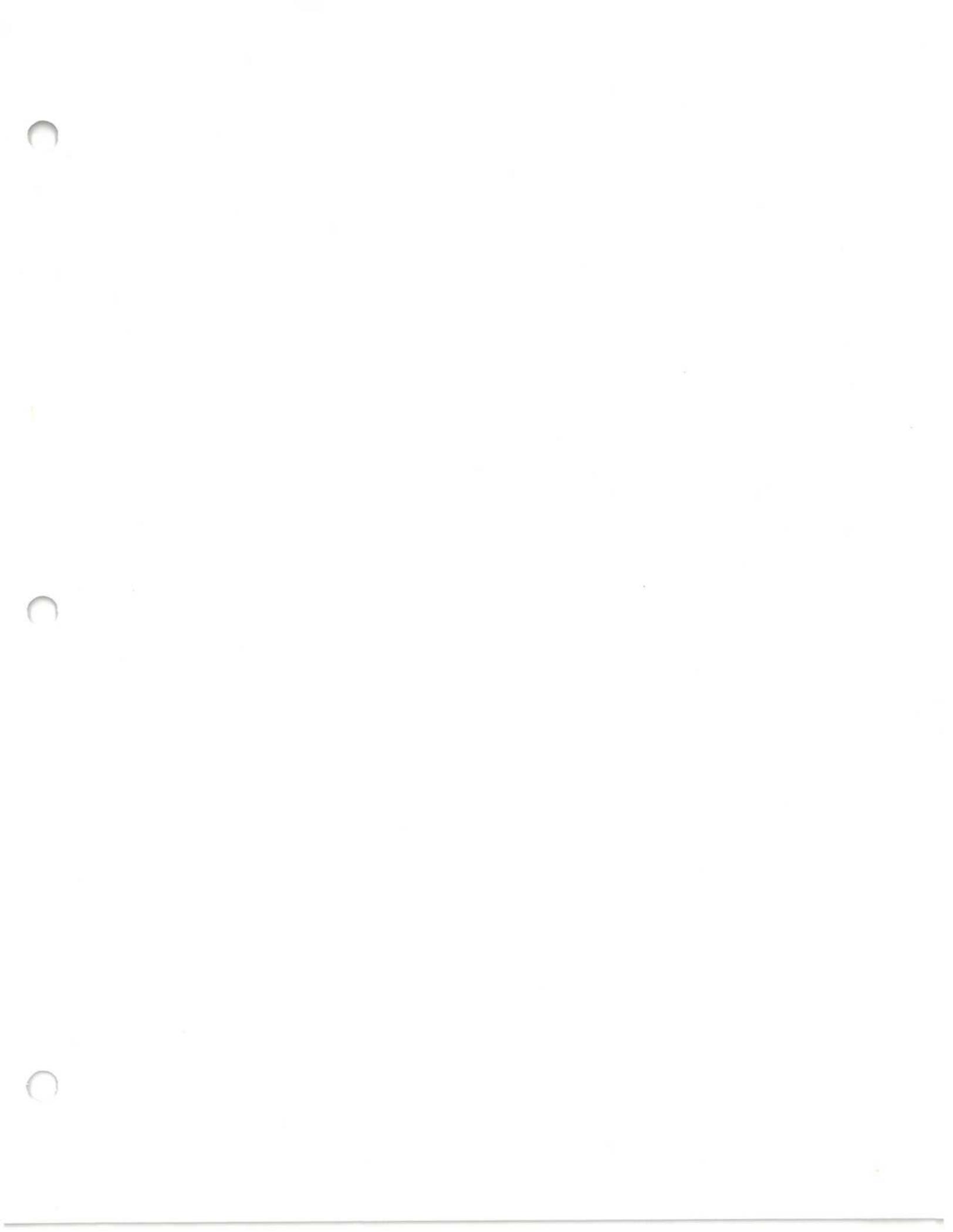
Plt. Def CW. 16
Date 7.22.2021
Judge _____
Case # A-19-2911
NOT ADM











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V I R G I N I A:

IN THE CIRCUIT COURT OF FAIRFAX COUNTY

-----x

JOHNNY C. DEPP, II, :

Plaintiff, :

v. : Case No. CL-2019-0002911

AMBER LAURA HEARD, :

Defendant. :

-----x

HEARING

BEFORE THE HONORABLE BRUCE D. WHITE

Conducted Virtually

Friday, September 18, 2020

10:15 a.m. ET

Job No.: 319581

Pages: 1 - 38

Reported By: Victoria Lynn Wilson, RMR, CRR

Plt. Def. CW. 17
Date 7.27.2021
Judge _____
Case # CL-19-2911
NOT Adm

1 be required to provide all this information is
2 denied. Mr. Waldman is still currently counsel
3 for a party in the case.

4 As to the documents that I guess I've got
5 sort of categorized here as fourth RFP 14; sixth
6 RFPs 1 through 6 and 8; and seventh RFPs 1, 3, 5,
7 and 7, those are, basically, the information
8 related to the divorce case. Request is denied as
9 to those documents. It is denied under the
10 doctrine of it's enough is enough. You all have
11 been through the divorce already. We're not going
12 to retry that divorce in this case, and that's
13 what I deem this to be aimed at.

14 The fourth RFP 1 and 2, that is to be
15 produced by September 30th.

16 As to the tax documents, it's granted in
17 part and denied in part. The documents which show
18 the gross income are to be produced. The
19 supporting documents are not to be produced. You
20 all have got a lot of information on income, and
21 this is just one more area where I envision a
22 rehashing of previous other issues.

1 CERTIFICATE OF SHORTHAND REPORTER-E-NOTARY PUBLIC
2 I, Victoria Lynn Wilson, the officer
3 before whom the foregoing proceedings were taken,
4 do hereby certify that the foregoing transcript is
5 a true and correct record of the proceedings; that
6 said proceedings were taken by me stenographically
7 and thereafter reduced to typewriting under my
8 direction; and that I am neither counsel for,
9 related to, nor employed by any of the parties to
10 this case and have no interest, financial or
11 otherwise, in its outcome.

12 IN WITNESS WHEREOF, I have hereunto set my
13 hand and affixed my notarial seal this 18th day of
14 September 2020.

15 My commission expires May 31, 2023.

16

17

18



19

VICTORIA LYNN WILSON

20

E-NOTARY PUBLIC IN AND FOR

21

THE COMMONWEALTH OF VIRGINIA

22