On behalf of: Claimant Witness: Edward White

No: First

IN THE HIGH COURT OF JUSTICE
QUEEN'S BENCH DIVISION
MEDIA AND COMMUNICATIONS LIST
BETWEEN

Claim No. QB-2018-006323

JOHN CHRISTOPHER DEPP II

Claimant

-and-

(1) NEWS GROUP NEWSPAPERS LTD (2) DAN WOOTTON

D	et	en	d	a	n	ts
					-	

FIRST WITNESS STATEMENT OF EDWARD WHITE

I, **EDWARD WHITE**, of 21700 Oxnard Street, Suite 400, Woodland Hills, California 91367 **WILL SAY** as follows:

- 1. I am the senior partner of Edward White & Co., LLP, Certified Public Accountants, with registered address at, United States, which I founded in 1976. My firm represents a number of high net-worth individuals, including the Claimant, John Christopher Depp II, who we have represented since 14 March 2016.
- 2. Unless stated otherwise, the facts and matters referred to in this witness statement are within my own knowledge and true or are true to the best of my knowledge, information and belief based on sources stated within this witness statement.
- 3. I make this witness statement in support of the Claimant's claim in these proceedings.

On behalf of: Claimant Witness: Edward White No: First

4. I do not know the full details of the Claimant's claims against the Defendants in these proceedings. However, I understand that the Defendants allege that Mr Depp arrived at a birthday celebration for his former wife, Ms Amber Heard, on 21 April 2016 when he was drunk and high on drugs.

- 5. I participated in a meeting with Mr Depp on the evening of 21 April 2016. This meeting took place in Mr Depp's office at his production company, Infinitum Nihil, located in Los Angeles, California. Also present were Mr Richard Smith, my partners Mr Troy Schmidt and Mr Lawrence Leavitt, Mr Fahar Faizaan, and Ms Christi Dembroski. The meeting began at approximately 7.30 pm and lasted between 1.5 and 2 hours.
- 6. I was able to observe Mr Depp extensively up close during the meeting and I did not perceive him to be physically impaired by alcohol or any other substance in any way. To the contrary, we discussed a number of significant financial and business matters at the meeting and Mr Depp gave them his full and undivided attention. He participated actively and intelligently in the meeting from beginning to end. I do not believe that he would have been able to participate in the manner that he did had he been impaired in any way. I believe that once the meeting had finished, Mr Depp left to return home directly, given that it was already late in the day.

On behalf of: Claimant Witness: Edward White No: First

I believe that the facts stated in this witness statement are true.

Signed: EdwardWhile

Edward White

Date: 10 December 2019

On behalf of: Claimant Witness: Edward White No: First

Claim No. QB-2018-006323

IN THE HIGH COURT OF JUSTICE
QUEEN'S BENCH DIVISION
MEDIA COMMUNICATIONS LIST
BETWEEN:

JOHN CHRISTOPHER DEPP II

Claimant

- and -

(1) NEWS GROUP NEWSPAPERS LTD (2) DAN WOOTTON

Defendant

FIRST WITNESS STATEMENT OF EDWARD WHITE

Brown Rudnick LLP 8 Clifford Street London W1S 2LQ T: +44 20 7851 6000 Solicitors for the Claimant

Ref: NPM/OB/034692.0002 nmicklethwaite@brownrudnick.com obischof@brownrudnick.com telton@brownrudnick.com

3329995 v1