

Claim No.: QB-2018-006323

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

B E T W E E N

JOHN CHRISTOPHER DEPP II

Claimant

and

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

Defendants

FIRST WITNESS STATEMENT OF HILDA VARGAS

I, **HILDA VARGAS**, of 4436 Durfee Avenue, El Monte, California, CA 91732, USA, will say as follows:

1. I work for the Claimant, Mr John Christopher Depp II, as a housekeeper and have done so for more than 30 years. In the period from 1988 until May 2016, I typically worked in the mornings in Mr Depp's home in West Hollywood on Sweetzer Avenue and then in the afternoons in Mr Depp's home downtown on Broadway with the address The Eastern Colombia Building, 849 South Broadway Street, Los Angeles, California 90014, United States ("**the "Eastern"**").
2. I confirm that save where otherwise appears the facts stated in this witness statement are within my own knowledge and that those facts are true to the best of my knowledge and belief. Where facts are not within my own knowledge, I confirm that they are true to the best of my information and belief and the source of that information is set out.

3. There is now produced and shown to me a paginated bundle of documents marked "HV1". All references to documents in this statement are to Exhibit HV1 unless otherwise stated.
4. I make this witness statement in support of the Claimant's claim in these proceedings.
5. I do not know the full details of the Claimant's claims against the Defendants in these proceedings. I make this witness statement in response to paragraph 151 of the witness statement of Amber Heard dated 15 December 2019, which I have seen. In that paragraph Ms Heard states that on or around the night of 21 April 2016 one of her dogs defecated in Ms Heard and Mr Depp's bed in the one of Mr Depp's flats in the Eastern. Ms Heard also states that their dogs had accidents in the house a lot, including having defecated in their bed before, and that this was a well-known pattern of the dogs' behaviour.

22 April 2016

6. On 22 April 2016, I arrived at Mr Depp's home at the Eastern at approximately 3 pm. There are several different loft-style units in this home. I began to clean unit 3, which is where Mr Depp usually slept with Ms Heard. The first floor of the unit includes a kitchen, living room, laundry room, bathroom, and patio. The master bedroom, office, and another bathroom are on the second floor. I began to clean downstairs with another cleaning woman. The downstairs level was somewhat messy but not unusually so.
7. The upstairs level, however, was extremely messy. I had just finished washing dishes and vacuuming and I was about to help the other cleaning woman change the sheets when I heard her call out. I joined her in the master bedroom. She was pointing to the bed and told me that she couldn't believe what she had found. I pulled back the top sheet on the bed and saw a large pile of faeces. I was horrified and disgusted. It was

clear to me that this was human faeces. I knew that the faeces could not have come from either of Mr Depp's and Ms Heard's two small dogs. I have cleaned up after those dogs many times and their faeces are much smaller. Further, I have never known those dogs to defecate in the bed.

8. I did not know what to think of what I had discovered. I was completely shocked. With my cell phone, I took pictures of the faeces in the bed (see exhibit HV1, pp.1-3). Then the other woman and I washed and changed the sheets.
9. While I continued to clean, Mr Depp's estate manager, Mr Kevin Murphy, called me to see if I was almost finished. Although I was embarrassed by the faeces I had found in the bed, I was so angry that I told Mr Murphy about it. He, at first, could not believe it. But I repeated that I had found the faeces in the bed that I had taken pictures.
10. Shortly after this incident, I stopped going to Mr Depp's home at the Eastern. I was uncomfortable around Ms Heard. I now work primarily at Mr Depp's West Hollywood home.
11. On Tuesday, 24 May 2016, I was working at Mr Depp's West Hollywood home when Ms Heard came over with her friend Ms Raquel Pennington. I was surprised because I had not seen Ms Heard at the West Hollywood home in several weeks. Ms Heard said hello to the other women who were also cleaning, but not to me.
12. Ms Heard then called me over to talk to her in the living room. Her face was pale and she did not appear to be wearing any makeup. I saw no bruises or marks on her face of any kind. Ms Heard told me that the pictures I had taken of the faeces had destroyed her marriage. I was very nervous and so I apologised, even though I did not believe that their marital problems were my fault or that I had done anything wrong. I also told Ms Heard that the faeces were there, that there was nothing I could do. Ms Heard argued with me saying that there were no faeces in the bed.

I, again, said that the faeces were there, that they were large and smelled awful. Ms Heard continued to disagree with me, but I wanted to end the conversation as quickly as possible. I have often heard Ms Heard yell at Mr Depp and at other people. She has a bad temper in my opinion, and I did not want her to yell at me. On the contrary, in the over 30 years I have worked for Mr Depp, I have never seen Mr Depp be physical with or yell at anyone.

STATEMENT OF TRUTH

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

Signed.....

HILDA VARGAS

Dated: 21 February 2020

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**FIRST WITNESS STATEMENT OF
HILDA VARGAS**

Ref: JA/JR/VA/D0185/001

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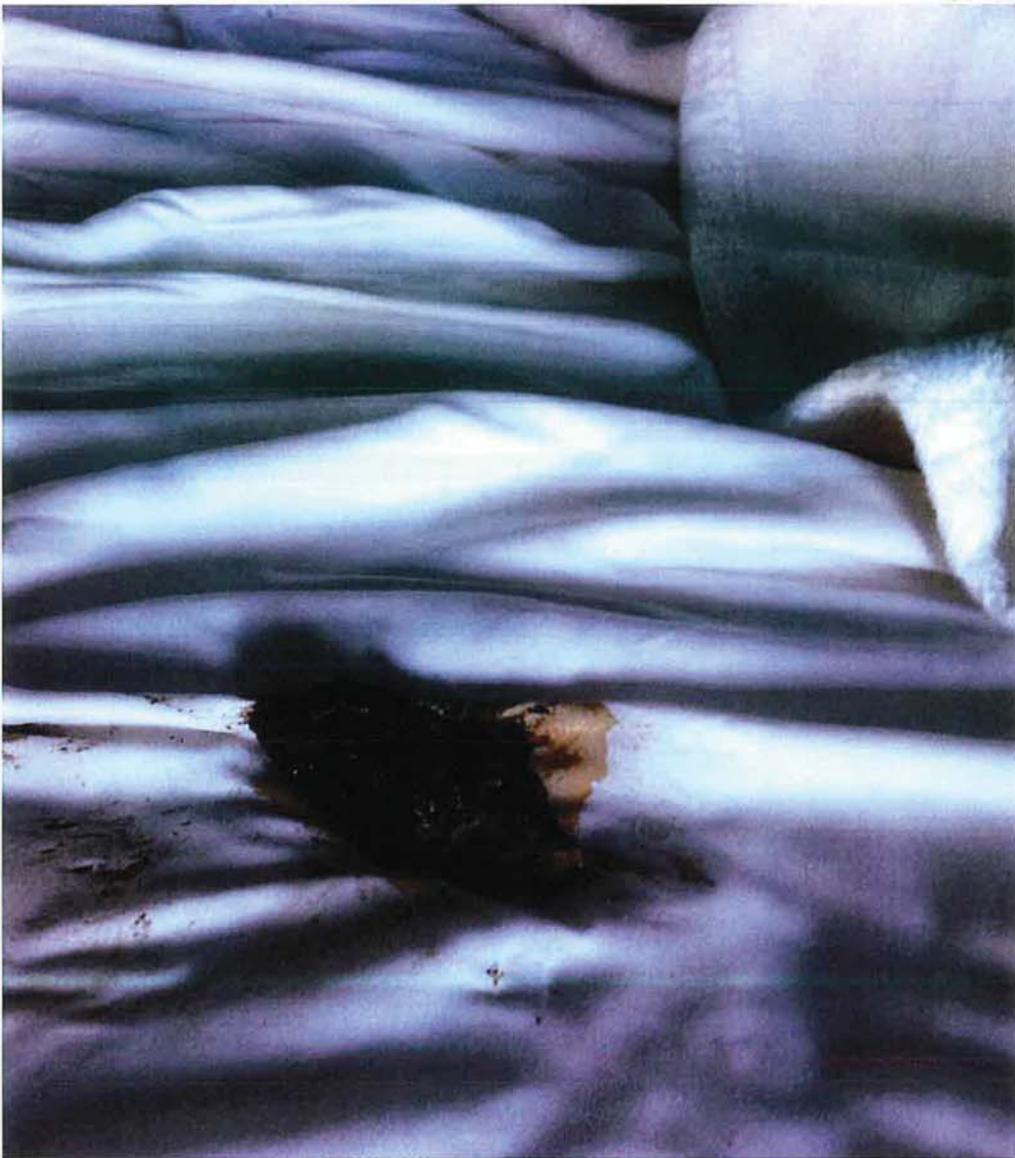
EXHIBIT HV1 TO THE FIRST WITNESS STATEMENT OF
HILDA VARGAS DATED FEBRUARY 2020

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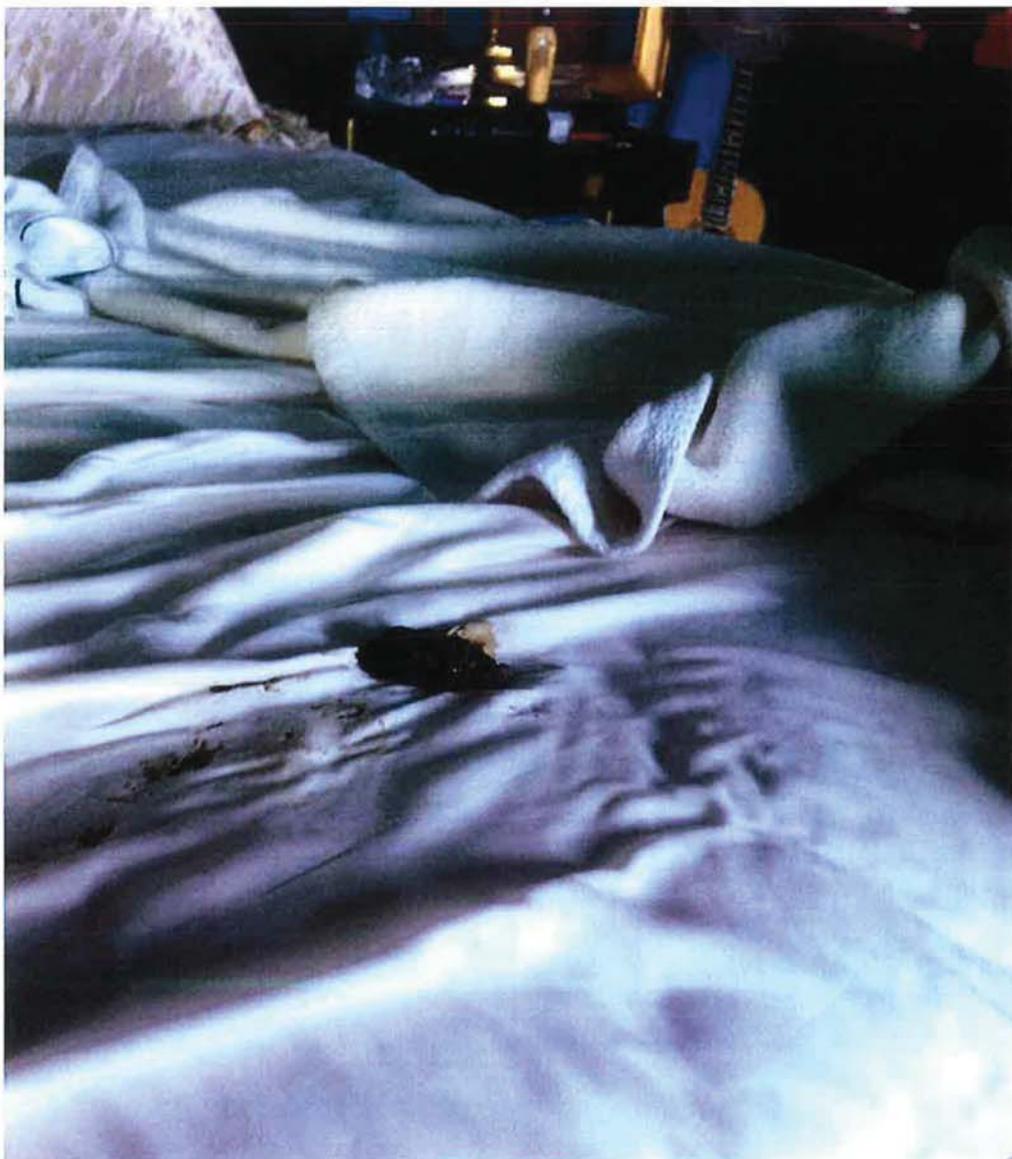


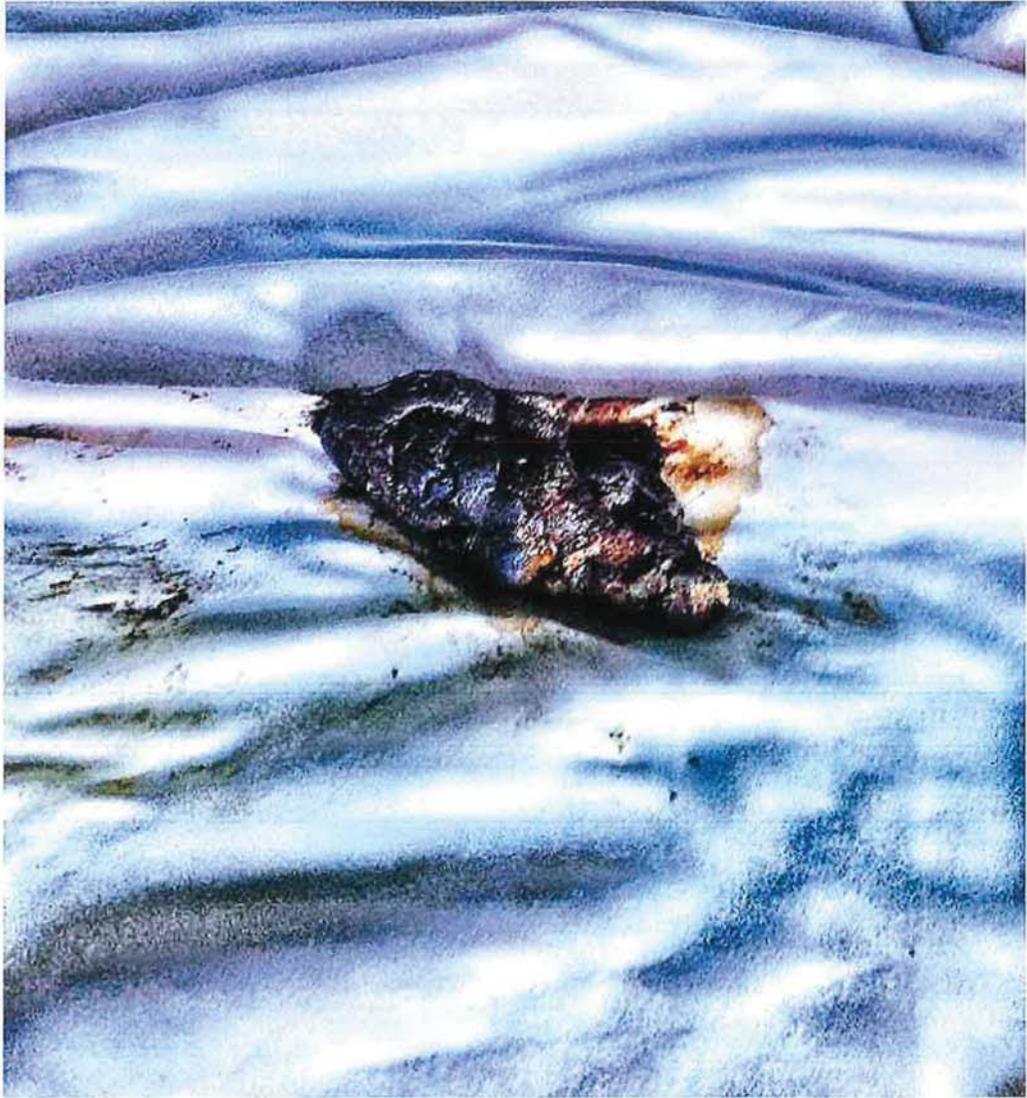
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