

Application notice

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Name of court Court of Appeal Civil Division		Appeal Ref. A2/2020/2034 /A	
		Claim no. QB-2018-006323	
Fee account no. (if applicable)	Help with Fees – Ref. no. (if applicable)		
PBA0089560	H W F - [] [] - [] []		
Warrant no. (if applicable)			
Claimant's name (including ref.) John Christopher Depp II Ref: JA/JR/VA/D0185/001			
Defendant's name (including ref.) (1) News Group newspapers Ltd (2) Dan Wootton			
Date	14 January 2021		

1. What is your name or, if you are a legal representative, the name of your firm?

Schillings International LLP

2. Are you a Claimant Defendant Legal Representative
 Other (please specify) _____

If you are a legal representative whom do you represent?

Claimant/Appellant

3. What order are you asking the court to make and why?

Pursuant to CPR 52.21(2)(b) the Appellant applies for permission to rely upon the Fifth Witness Statement of Joelle Rich dated 14 January 2021, and the Witness Statement of Jennifer Howell dated 13 January 2021 attached to this application notice, in support of his appeal against the decision of Mr Justice Nicol of 2.11.20 dismissing his libel action.

Documentary evidence which has been obtained since trial, and which the Appellant could not with reasonable diligence have obtained for use at the trial, demonstrates that the Respondents' principal witness (Amber Heard) lied on oath on matters which the trial judge placed substantial reliance when deciding to prefer her evidence to the Appellant's.

A witness has come forward since the trial, having learned of evidence given during the trial by Ms Heard and her sister, Whitney Henriquez, with evidence which wholly undermines the evidence they gave, goes to the central issue at trial, namely which of the competing accounts of domestic abuse should be accepted, and which the Appellant could not with reasonable diligence have obtained for use at the trial. The fresh evidence demonstrates, respectively, that the judgment was obtained on a false basis and that there are strong reasons to conclude that the verdict is wholly unsound.

4. Have you attached a draft of the order you are applying for? Yes No

5. How do you want to have this application dealt with? at a hearing without a hearing
 at a telephone hearing

6. How long do you think the hearing will last?

1 Hours 30 Minutes

7. Is this time estimate agreed by all parties?

Yes No

8. Give details of any fixed trial date or period

The Appellant's application for permission to appeal is before the Court, decision pending.

9. What level of Judge does your hearing need?

Lord/Lady Justices of Appeal

10. Who should be served with this application?

Defendants/Respondents (Claimant/Appellant will serve)

9a. Please give the service address, (other than details of the claimant or defendant) of any party named in question 9.

10. What information will you be relying on, in support of your application?

- Tick appropriate box.
- the attached witness statements
 - the statement of case
 - the evidence set out in the box below

Statement of Truth
 [I believe] [The applicant believes] that the facts stated in this section (and any continuation sheets) are true. [I understand] [The applicant understands] that proceedings for contempt of court may be brought against anyone who makes, or causes to be made, a false statement in a document verified by a statement of truth without an honest belief in its truth.

Signed _____ Dated _____
 Applicant('s legal representative)('s litigation friend)

Full name _____

Name of applicant's legal representative's firm _____

Position or office held _____
 (if signing on behalf of firm or company)

11. Signature and address details


 Signed _____ Dated 14.01.21
 Applicant's legal representative

Position or office held Partner
(if signing on behalf of firm or company)

Applicant's address to which documents about this application should be sent

Schillings International LLP							
12 Arthur Street							
Candlewick							
London							
Postcode							
E	C	4	R	9	A	B	

If applicable	
Phone no.	020 7034 9000
Fax no.	N/A
DX no.	
Ref no.	JA/JR/VA/D0185/001

E-mail address	Jenny.Afia@schillingspartners.com ; Joelle.Rich@schillingspartners.com ; Victoria.Anderson@schillingspartners.com ; Alex.Maunders@schillingspartners.com
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