

**For the Appellant
J Rich
Sixth
JR2 and JR3
02.03.21**

Appeal Ref: A2/2020/2034

**IN THE COURT OF APPEAL (CIVIL DIVISION)
ON APPEAL FROM THE HIGH COURT OF JUSTICE
QUEEN'S BENCH DIVISION
MEDIA AND COMMUNICATIONS LIST**

BETWEEN:

JOHN CHRISTOPHER DEPP II

Appellant

-and-

NEWS GROUP NEWSPAPERS LTD (1)

Respondents

DAN WOOTTON (2)

SIXTH WITNESS STATEMENT OF JOELLE RICH

I, JOELLE RICH, of Schillings International LLP, 12 Arthur Street, London EC4R 4AB, will say as follows:

1. I am a solicitor of the Senior Courts of England and Wales and a partner in the firm of Schillings International LLP, solicitors for the Appellant, of the above address.
2. I am the partner with conduct of the Appellant's appeal and am duly authorised by him to make this statement.
3. Save where stated otherwise, the matters in this statement are within my own knowledge and are true. Where matters stated are not within my own knowledge, I give the source, and those matters are true to the best of my information and belief.

4. I make this statement in support of the Appellant’s application for permission to adduce fresh evidence in support of his appeal and give that fresh evidence.
5. I ask for permission that this statement and the Third Statement of Mr Edward White be admitted. Each responds briefly to matters raised in the statement by Mr Smele submitted by the Respondents in response to the application.
6. There is now produced and shown to me a paginated bundle of documents marked **JR2** and **JR3** to which I refer to below.

Information from the ACLU

7. At [36 – 38] of my Fifth Witness Statement, I set out the position in relation to the subpoenas to the ACLU as things stood at that time according to information from Brown Rudnick, the Appellant’s US attorneys. After problems with service, at [46] I stated that the ACLU subpoena was served on 22.12.20.
8. At [19] of Mr Smele’s Fourth Witness Statement he states that his understanding is that, contrary to my evidence, the Appellant’s US attorneys have “*still not served this subpoena on the ACLU*” and that he had “*recently been informed by in-house counsel for the ACLU that this subpoena was never properly served on it*”.
9. However, I am informed by the Appellant’s US attorneys, that subpoenas on different legal entities of the ACLU in addition to one of its lawyers and Executive Directors, Mr Benjamin Wizner, have been served per the table below. These subpoenas seek documents relating to the broader relationship between the ACLU and Ms Heard and the one served on Mr Wizner did not relate to his knowledge of the donations.

Subpoena	Issue Date	Return Date	Status
ACLU, Inc.	15.12.20	25.01.21	Served on Abdi Soltani 22.12.20; no response. (Subpoena referred to in para 7 above)
ACLU Foundation	04.02.21	01.03.21	Served on Abdi Soltani 11.02.21
Benjamin Wizner	04.02.21	01.03.21	Served 15.02.21

10. Mr Soltani is the stated “Agent for Service of Process” listed for the two entities served (see page 1 to 2 of JR 2). I am informed by Mr Ben Chew and Ms Camille Vasquez of Brown Rudnick that if the ACLU considered that the subpoena issued on 15.12.20 and served on 22.12.20 was improperly served, the standard practice is to respond to confirm the position or to object to the subpoena on that basis. They further informed me that there is a professional responsibility on corporate entities who have in-house counsel, as the ACLU does, to at the very least acknowledge a subpoena.
11. It appears from Mr Smele’s statement that the ACLU has been more willing to engage with the Respondents on its position.
12. In respect of the subpoena served on Mr Wizner I understand that he has responded yesterday, 01.03.21. The matters raised are not related to his knowledge of the donations and the answers given to date do not provide any further information regarding the donations. I understand that the ACLU has not otherwise responded to the Appellant’s US lawyers to acknowledge and/or object to the remaining subpoenas.

The Appellant’s suspicion of Ms Heard’s dishonesty

13. Mr Smele at [9] relies on text messages sent by the Appellant to his then-agent on 17.08.16 and to his nurse on 18.08.16 which suggested that he believed that Ms Heard was capable of making PR statements asserting that the proceeds from the divorce would be donated to charity, without any intention of making those donations. These text messages were sent during and after the day of the divorce settlement, and following Ms Heard’s PR statement released the following day, which I referred to at [11] of my Fifth Witness Statement. The text messages pre-date the start of the payments of the proceeds of the divorce from the Appellant to Ms Heard. The Appellant could have had no knowledge of whether the donations would in fact be made at that stage.
14. The context of the text messages in August 2016 was a very acrimonious separation. The Appellant had no good things to say about Ms Heard at this time. She had obtained an ex parte temporary restraining order a few months earlier on 27.05.16 and generated substantial media attention when doing so. On the same day, her parents had texted the

Appellant asserting that the TRO had only been obtained under advice from her lawyers in order to retain control over their penthouse where she lived, despite the Appellant stating no intention that she should leave. Those text messages were set out at [102-109] of the Appellant's Second Witness Statement dated 12.12.19 which is enclosed at 3 to 40 of JR2.

15. The text messages relied on by the Respondents in August 2016 (and after) provided no basis for seeking third party disclosure of any documents relating to the donations in these proceedings.
16. Ms Heard continued to make public statements that the proceeds from the divorce had been donated in full to the two charities after she had received the full \$7 million. On 18.10.18, for example, Ms Heard provided a televised interview to the Dutch broadcaster RTL. A clip from this interview was disclosed in these proceedings on 10.06.20 and is enclosed as Exhibit JR3. The relevant exchange is as follows:

RTL Interviewer: And actually there were all kinds of accusations flying your way when you said all this, and then there was a divorce settlement, you got seven million dollars, people were saying this is all about the money, but then you did something that twisted that whole argument. What did you do with that money?

Ms Heard: Seven million dollars in total was donated to – I split it between the ACLU and Children's Hospital of Los Angeles –

RTL: The ACLU is a human rights organisation –

Ms Heard: Sorry, ACLU is a prominent organisation – non-profit organisation - in the United States, it's called the American Civil Liberties Union and they work on behalf of marginalised communities on the ground and on legislative reform –

RTL: Right, well more power to you because that's something that I've never heard of –


Ms Heard: *I wanted nothing.*]

17. At [13], Mr Smele refers to the “*First Requests for Admission*” document dated 25.11.19. The Appellant’s US lawyers used this document as an opportunity to request an admission to any point of contention or suspicion. They chose to take a “kitchen sink” approach to that exercise. The question relating to the donations was one of 157 questions and based on no more than suspicion. As is apparent from Ms Heard’s response at pages 41 to 69 of JR2, she relied on a Virginia State Rule that prohibits a party from serving more than 30 requests for admission without leave of the court to refuse to respond to questions 31 – 157. Ms Heard’s response and refusal to answer 126 questions provided the Appellant with no evidence that the true position might be different from her publicly-stated one.
18. At [14], Mr Smele also seeks to rely on a line of questioning by the Appellant’s US lawyers to Ms Sexton during her deposition on 18.12.19. Mr Smele includes the question that was put to Ms Sexton but does not include her reply, which was that she would never ask Ms Heard about her finances (page 38 of JS 5, internal page 153). It took the matter no further.
19. The additional disclosure given in these proceedings on 10.06.20 was varied and included a number of articles and other material pertaining to Ms Heard’s keenness to cultivate a positive public image following her separation from the Appellant which was potentially relevant background especially to incident 14. The Appellant had no evidence that Ms Heard’s donation statements were false until after the end of the trial.
20. The subpoenas for the charities were issued in May 2020. I accept that had they been complied with before Ms Heard was cross-examined, Brown Rudnick would have shared them with us and inevitably Leading Counsel would have deployed the documents in cross-examination of Ms Heard.
21. Had Ms Heard not taken the extensive steps to delay, quash, oppose and then appeal the subpoenas in the US through various applications, it is possible that some of the underlying documents might have been obtained prior to her cross-examination in these

proceedings. In fact, Ms Heard's stance in the US Proceedings delayed production of the documents for eight months, and Brown Rudnick are still waiting for further information from the ACLU. I do not accept, as Mr Smele asserts, that even if the subpoenas had been issued earlier, the Appellant would "in all probability" have obtained the evidence by trial, still less that to seek an adjournment of the trial was a viable option as suggested at [18] and [30].

STATEMENT OF TRUTH

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

Joelle Rich

Partner at Schillings International LLP

Date: 2 March 2021

Appeal No. A2/2020/2034

Claim No. QB-2018-006323

IN THE HIGH COURT OF JUSTICE

QUEEN'S BENCH DIVISION

MEDIA AND COMMUNICATIONS LIST

BETWEEN:

JOHN CHRISTOPHER DEPP II

Claimant / Appellant

- and -

(1) NEWS GROUP NEWSPAPERS LTD

(2) DAN WOOTTON

Defendants / Respondents

**SIXTH WITNESS STATEMENT OF
JOELLE RICH**

Ref: JA/JR/VA/D0185/001

Schillings International LLP

12 Arthur Street
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EC4R 9AB

Tel: 020 7034 9000

Appeal Ref: A2/2020/2034

Claim No. QB-2018-006323

**IN THE COURT OF APPEAL (CIVIL DIVISION)
ON APPEAL FROM THE HIGH COURT OF JUSTICE
QUEEN'S BENCH DIVISION
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BETWEEN:

JOHN CHRISTOPHER DEPP II

Appellant / Claimant

-and-

(1) NEWS GROUP NEWSPAPERS LTD

(2) DAN WOOTTON

Respondents / Defendants

EXHIBIT JR2

Dr. Shirley N. Weber
California Secretary of State

Business Search - Results







The California Business Search is updated daily and reflects work processed through Sunday, February 28, 2021. Please refer to document **Processing Times** for the received dates of filings currently being processed. The data provided is not a complete or certified record of an entity.

- Select an entity name below to view additional information. Results are listed alphabetically in ascending order by entity name, or you can select a column title to change the sort order.
- To refine the search results, enter a word or a string of words in the "Narrow search results" box. The "Narrow search results" will search on all fields of the initial search results.
- For information on checking or reserving a name, refer to **Name Availability**.
- For information on requesting a more extensive search, refer to **Information Requests**.
- For help with searching an entity name, refer to **Search Tips**.
- For descriptions of the various fields and status types, refer to **Frequently Asked Questions**.

Results of search for Corporation Name keyword "american civil liberties union" returned 8 entity records (out of 8 records found).

Show entities per page

Narrow search results:

 Entity Number	 Registration Date	 Status	 Entity Name	 Jurisdiction	 Agent for Service of Process
C4584366	04/14/2020	ACTIVE	<u>AMERICAN CHINESE CIVIL LIBERTIES UNION FOUNDATION</u>	CALIFORNIA	BENNY KIRK
C0364096	11/25/1958	ACTIVE	<u>AMERICAN CIVIL LIBERTIES UNION FOUNDATION OF NORTHERN CALIFORNIA, INC.</u>	CALIFORNIA	ABDI SOLTANI
C2366319	11/08/2001	ACTIVE	<u>AMERICAN CIVIL LIBERTIES UNION FOUNDATION, INC.</u>	NEW YORK	ABDI SOLTANI
C0670473	12/04/1972	ACTIVE	<u>AMERICAN CIVIL LIBERTIES UNION OF NORTHERN CALIFORNIA</u>	CALIFORNIA	ABDI SOLTANI
C1630084	12/23/1988	ACTIVE	<u>AMERICAN CIVIL LIBERTIES UNION OF SAN DIEGO & IMPERIAL COUNTIES, INC.</u>	CALIFORNIA	NORMA CHAVEZ-PETERSON
C0205426	05/08/1946	ACTIVE	<u>AMERICAN CIVIL LIBERTIES UNION OF SOUTHERN CALIFORNIA</u>	CALIFORNIA	ESMERALDA MARTINEZ
C2549252	07/31/2003	ACTIVE	<u>AMERICAN CIVIL LIBERTIES UNION, INC.</u>	DISTRICT OF COLUMBIA	ABDI SOLTANI

https://businesssearch.sos.ca.gov/CBS/SearchResults?filing=&SearchType=CORP&SearchCriteria=american+civil+liberties+union&SearchSubT... 1/2

Entity Number	Registration Date	Status	Entity Name	Jurisdiction	Agent for Service of Process
C0252404	03/15/1951	DISSOLVED	<u>AMERICAN CIVIL LIBERTIES UNION, SOUTHERN CALIFORNIA BRANCH, LEGAL DEFENSE AND EDUCATIONAL FUND, INC.</u>	CALIFORNIA	

Showing 1 to 8 of 8 entities

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On behalf of: Claimant
Witness: John Christopher Depp II
No: Second
Exhibit: JD2
Date: 12 December 2019

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

Claim No. HQ18M01923

B E T W E E N:

JOHN CHRISTOPHER DEPP II

Claimant

-and-

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

Defendants

**SECOND WITNESS STATEMENT OF
JOHN CHRISTOPHER DEPP II**

I, **JOHN CHRISTOPHER DEPP II**, of Infinitum Nihil, 1472 N Sweetzer Avenue, LA 90069, USA, **WILL SAY** as follows:

1. I am the Claimant in these proceedings.
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. There is now produced to me and marked “**Exhibit JD2**” a paginated bundle of true copy documents referred to in this witness statement. References to page numbers are references to Exhibit JD2, unless otherwise stated.
4. I make this witness statement in support of my claim in these proceedings.

A. INTRODUCTION

5. These proceedings relate to an article published by the Defendants, which appeared online on 27 April 2018 and in hard copy on 28 April 2018 (together, the “**Article**”). As set out in the Particulars of Claim dated 13 June 2018, at paragraph 10, the Article included words which I contend meant and were understood to mean that I was guilty, on overwhelming evidence, of serious domestic violence against my former wife, Ms Amber Heard, causing significant injury and leading to her fearing for her life. The Article further suggested that I was constrained to pay no less than £5 million to compensate Ms Heard for my alleged behavior, that my actions resulted in me being subjected to a continuing court restraining order, and that, for that reason, I am not fit to work in the film industry. The Article said that JK Rowling should not continue to cast me in the *Fantastic Beast* series, referring to me as the “wifebeater” in the online version.
6. In these proceedings the Defendants rely on various allegations made by Ms Heard, the vast majority of which have only been made subsequent to the Defendants publishing/authoring the Article. I have consistently denied Ms Heard’s allegations of domestic violence since she first made them in May 2016, when she applied to the California Court for a temporary restraining order (the “**TRO Application**”). I note that at the time that she made the TRO Application, the only specific, particularised allegations of abuse referred to by Ms Heard were alleged to have occurred on 21 April 2016 and 21 May 2016. These were the accusations on which the Defendants had initially relied for the Article.
7. The Article relates to my casting in *Fantastic Beasts: The Crimes of Grindelwald*, in which I was cast in around November 2016.

8. As a related franchise to the Harry Potter films and as authored by Ms Rowling, *Fantastic Beasts* is one of the biggest global film franchises to be involved in and I played Grindelwald, the character named in the title.
9. It was an extremely important project for me to be involved in, as since Ms Heard first made her false allegations, those allegations have been a constant issue in my casting in other films.

B. BACKGROUND

10. For the avoidance of any doubt, I have never abused Ms Heard, or, indeed, any other woman, in my life. I am from a Southern family and rules were instilled in me from birth by my mother: you would be a Southern gentleman or it would be beaten into you. Even as a child, chivalry was extremely important and, whether or not this is considered old-fashioned, it is still something that I consider very important. Integrity, dignity, honesty, and respect for women: these were characteristics of a gentleman and characteristics that I was always expected to have. As part of this, I feel it is a strong and central part of my moral code that I would never strike a woman, under any circumstances, at any time. I find it simply inconceivable and it would never happen.
11. This was strengthened by the circumstances of my upbringing: I saw the abuse of women at first hand. I heard in horror about my mother having been beaten by her first husband. I have lived through my sister being beaten by two of her husbands. I myself was regularly beaten for the most minor and trivial things. Exposure to abuse was something that was very much a part of my childhood and I feel it has had an enormous effect on my life. I have always vowed that the upbringing of my own children would be precisely the opposite of the upbringing that I experienced. There would be no abuse and no violence. I had been through that so my children would not.
12. I have had a number of very important romantic relationships before I spent 14 years with my long term former partner, Vanessa Paradis. All relationships have their ups and downs, but there was never any violence or physical abuse in any of those relationships. I have two

wonderful children from my relationship with Ms Paradis and I am enormously proud of them and the upbringing that we gave them. What we had could never have happened in an abusive relationship and no one could ever say that I had been abusive. My children really grounded my life and gave me an enormous sense of purpose and love and confirmed, once again, how no relationship or upbringing should be like my parents' relationship and my upbringing.

C. MY RELATIONSHIP WITH MS HEARD

13. I first met Ms Heard when she auditioned for a film that I was acting in and producing, The Rum Diary, which was based on my dear friend Hunter S. Thompson's book of the same name. It was obvious to me that Hunter's dream of a character had come alive in Ms Heard and Ms Heard subsequently acted in that film. There was no relationship between us at this point and she was married to her former partner.
14. Once we had finished the filming, I do not believe I saw Ms Heard for a couple of years until we started doing the press for the release of the film. She was then extremely friendly to me and keen to tell me about the break up with her former partner that she had recently gone through. If I had known then what I knew now, I would have seen the red flag warning signs, but I did not. She was beautiful, seemingly incredibly interested in me and my work, and I fell for it. She bombed me with what appeared to be love. It was not until much later that I understood that she had an agenda, namely to get married to me in order to progress her own career and/or to benefit financially, and she knew how to bring it about. For example, at the time, she repeatedly told me how much she admired my films; however, later in our relationship she admitted that she had never seen any of my films. She knew what she wanted and I was an easy target.
15. It was a few months after the start of our relationship that I started to recognize the lies. As early as a couple of months, the slivers of fraudulence, the excuses for things and unexplained absences started. I justified these things to myself at the time and passed them off but the signs were there. She had well and truly researched me and my interests and she

would try to pose as some expert or intellectual on these things to try to ingratiate herself with me. She presented herself as a carbon copy of me, with precisely the same interests, thoughts, favorite writers, taste in music and art as me. Rather than see this as calculated, sociopathic and emotionally dishonest, I convinced myself that it was endearing and sweet.

16. Fundamentally, the signs that Ms Heard began to demonstrate then became the full and developed aspects of her character that I came to know during the incredibly unhappy time when we were together. She is a calculating, diagnosed borderline personality; she is sociopathic; she is a narcissist; and she is completely emotionally dishonest. I am now convinced that she came into my life to take from me anything worth taking, and then destroy what remained of it. Indeed, later in our relationship when we sought the help of a marriage counsellor, the marriage counsellor confirmed to me that Ms Heard had a borderline, toxic narcissistic personality disorder and is a sociopath. It was further explained to me that Ms Heard's projection of emotions is extremely exaggerated, she will always overreact and she simply cannot be wrong in any circumstances. She invariably accuses other people of the bad things she herself has done. The same has been said to me by my private doctor, David Kipper.

17. From early on in our relationship and throughout the course of it, Ms Heard was abusive to me physically and verbally. The abuse was such a common occurrence that it is difficult for me to specify when and where such abuse took place as it was essentially ongoing. When being abused by Ms Heard, my normal reaction was to try not to engage with her and then to remove myself from the situation. Because of that, she would then often call me a "coward" and tell me that I am "not a man." However, I learned very early on in our relationship that Ms Heard was extremely argumentative and would often look to have a fight for no particular reason. I also learnt that it was pointless to try to engage with Ms Heard when she was in such a mood: this would simply aggravate her even more. Therefore, it was better to try to wait for her mood to subside and then subsequently seek to try to placate her and to smooth things over.

18. While I may have had disagreements with people in my life, nothing has upset me as much as Ms Heard's words and behavior towards me. She really knew how to hurt me and really sought to do that at any opportunity that she could get. In particular:

- a. Given my own childhood, I have always been particularly sensitive about my children and their feelings. Ms Heard knew this and regularly sought to manipulate me emotionally in this regard. She told me on multiple occasions what a "horrible father" I was. For example, I remember her telling me this during the filming of *Mortdecai* in London in January 2015, when my children were just in the room next door. I found it devastating and heart-breaking to hear this and she knew exactly the effect her words would have.
- b. She continuously belittled me and called me names, including in front of and to other people. On various occasions she would snap at me and call me a "*fat old man*." She even told my former head of security (who is sadly no longer with us), Mr Jerry Judge, that I was a "fat old man" and she did not know why she married me. When I confronted her about this, she denied she had ever said it. This was often her recourse when confronted with her lies: she would simply try to play innocent and accuse other of lying about what she had said or done. To Amber, other people were always the liars.
- c. As I explain at paragraphs below, although I was in recovery from drug addiction during significant parts of my marriage to Amber, instead of supporting my sobriety, she often encouraged me to drink alcohol and to take drugs, even though she knew that my relationship with alcohol and drugs was a difficult one for me.
- d. She lied to me so often, about both banal and important things. She lied about people I know not remembering me in order to hurt me. She lied about what she said about me and she lied to my family about my actions.

19. The sad irony of her abuse hoaxes is that they mirror what she actually subjected me to during the course of our relationship. I took the years of verbal and physical abuse and only

told those closest to me about it. The reward for my silence is that she has now fabricated that she was the one that was abused.

D. MY DRUG TAKING AND DRINKING

20. I understand from my solicitors that the Defendants have made a number of allegations in relation to my drug taking and drinking. It has been well reported and I have been open about my challenges with alcoholism and addiction throughout my life. In fact, I started drinking and taking drugs when I was still a child. I am not in any way embarrassed to say this. However, the way in which the Defendants have sought to portray this problem is not a fair or accurate reflection of the reality of addiction. This is particularly so when Ms Heard was a regular, heavy drug user throughout our relationship and often drank far more alcohol than I did.
21. My addiction over the years has been to Roxicodone pills, which are often referred to as "Roxies" and which is one of the brand names for oxycodone which is an opioid prescription painkiller. You can develop an addiction to Roxies incredibly quickly, i.e. in a matter of days, and once addicted, they are incredibly hard to kick. This is the drug to which I have been addicted and Ms Heard's attempt to portray me as a general drug addict is so far from accurate and she knows that. When you try to come off Roxies, it is an extremely painful process and has to be done with medical assistance. I can only describe the feeling of withdrawal as like having millions of boiling marbles under your skin. The pain is excruciating. I was on them for a number of years prior to meeting Ms Heard but I was not on them in the period after the Rum Diary and when I started my relationship with Ms Heard.
22. I have taken other drugs in my life and I did take other drugs during the course of our relationship but I never suffered with addiction with those drugs. Nor did any drug or alcohol ever make me undertake violence against anyone.

23. When I first got together with Ms Heard, at the premiere for The Rum Diary in late 2011, I was drinking. However, that night I had a conversation with a friend, whom I told I wanted to stop drinking and who then hooked me up at rehab for 3 days after the premiere.
24. I remember that before the release of The Lone Ranger in July 2013, I had had another five day stint in rehab and had not been drinking prior to the release of that film. Ms Heard, on the other hand, continued to drink and take amphetamines, MDMA, magic mushrooms and other drugs in front of me. It was not uncommon for her to have two bottles of wine in a space of just over an hour. She never supported me in my attempts to be strong and to avoid alcohol and drugs.
25. After this, for the most part of our relationship, and with very occasional lapses, I would use marijuana and drink wine; whereas Ms Heard took ecstasy, cocaine, MDMA, a lot of magic mushrooms, and would use a type of amphetamine similar to speed almost daily. At times, we took drugs together: MDMA, mushrooms, cocaine. However, these were not common occurrences, whereas Ms Heard's drug taking was extensive and constant. I consider her to have an addiction to both cocaine and amphetamines.
26. I have tried not to drink alcohol for periods of our relationship, but, despite that, Ms Heard often encouraged me to do so. By way of example, many times she placed a whiskey shot in front of me before bed asking me to drink it. She also often wanted me to procure drugs for her.
27. Despite her own drinking and drug taking habits and the fact that she did infinitely more than I did during our relationship, Ms Heard often bombarded me with requests to stop drinking and endless "complaints" suggesting that I "drank too much."
28. In fact, Ms Heard would often seek to accuse me of drug taking or drinking when I was in a low mood or when she was unhappy with me. She often complained to others that I was a drunk, despite the fact that at those times I may not have even been drinking. I had explained

this to Ms Heard during the relationship, but she did not stop. I now understand that often this was yet another way of her belittling me.

E. SPECIFIC INCIDENTS THAT THE DEFENDANTS RELY ON

First Alleged Abuse in Late 2012/Early 2013

29. I understand from my solicitors that the Defendants allege that Ms Heard and I were in Los Angeles when I first hit her. They state that until that point in our relationship I had been sober, but that, allegedly, it was apparent to Ms Heard that I had started drinking and using drugs again. They state that during a conversation about a tattoo, Ms Heard laughed at something I had said as she thought I had made a joke. They allege that I responded by repeatedly slapping Ms Heard across the face and that the third hit knocked Ms Heard to the floor.
30. I do not recall having any conversation about a tattoo around this time and I did not slap Ms Heard then or at any point in time; neither did I hit her or commit any violent act against her. This is simply a false anecdote which has been made up by Ms Heard.
31. It is further alleged that after hitting her, I cried, apologised and tried to explain my behavior, saying that I snap sometimes into something I called "the monster" and promised that I would not do it again.
32. This allegation is also untrue and no part of this alleged event took place. As I explained above, I have never hit Ms Heard or any other woman in my life. I do not recall apologizing and calling myself a "monster" on that particular occasion, but I know that Ms Heard sometimes referred to me as a "monster" and, as we continued into our relationship, she started making me believe that I was one. This was, however, never a reference to any violence.

March 8th, 2013

33. I understand from my solicitors that the Defendants also allege that on March 8th, 2013 Ms Heard and I were in her home in Los Angeles. They state that I was getting drunk and high on drugs and was angry that Ms Heard had hung up a painting given to her by someone she had formerly dated. Allegedly my team and Ms Heard asked her sister to come over to try to intervene with me, which she did. After Ms Heard's sister left, they state that I hit Ms Heard so hard that blood from her lip ended on the wall. They state that I subsequently sent Ms Heard a text message referring to that evening as a 'disco bloodbath' and a 'hideous moment' and that the morning after this incident I tried to set fire to the painting.

34. I cannot remember if I was with Ms Heard at her home on March 8th, 2013. I know that at some point around this time I did ask Ms Heard to remove a painting that she had received from her former wife from the bedroom, as a courtesy to me. I do not recall the exact date I asked Ms Heard to do this. I do not remember Ms Heard's sister being asked to come over either by Ms Heard or by any member of my team when this happened. I certainly did not hit Ms Heard at all, then or ever, and her accusation that I hit her so hard that blood from her lip ended up on the wall is precisely the kind of picturesque but absurd lie she often tells. Insofar as I exchanged texts with Ms Heard on March 12th, 2013 (and I do not remember whether I did or not), my intention in apologising would have been, as always, to placate Ms Heard. The words "*disco blood bath*" and a "*hideous moment*" would not have referred to any physical abuse. I also did not try to set fire to the painting in question at any point in time.

May 24th and 25th, 2014

35. The Defendants also allege that on or about May 24th, 2014 Ms Heard and I were travelling on a private aeroplane from Boston to Los Angeles. They state that, after drinking heavily, I threw objects at Ms Heard causing her to retreat to a different seat. Then, I, allegedly, provocatively pushed a chair at her as she walked by, yelled at her, and taunted her. They state that when Ms Heard stood up, I kicked her in the back, causing her to fall over, threw my boot at her while she was on the ground and continued to scream obscenities until I went into the bathroom of the aeroplane and passed out. This story is nothing but one more pathological lie made up by Ms Heard.

36. I remember the flight from Boston to Los Angeles in detail. I had drunk alcohol prior to and on the flight, but my behavior was not as alleged at all. As I explained by text message a few days later on May 27th, 2014 to my sister, Christi Dembrowski, after Ms Heard had tried to suggest to Ms Dembrowski that I should see a doctor (page 7 of Exhibit JD2):

“No reason for her to speak to anyone, let alone a doctor...I’m done. Her actions have added more drama than necessary and when was I unhealthy, exactly??? When I was not sober for a day??? Hmm... I guess that’s what people call falling off the wagon...It’s happened to a lot of my friends...Their wives don’t stop calling them.”

37. Ms Heard and I were seated at the central table in the cabin. I was drawing art sketches in my notebook, as I like to do when travelling, when Ms Heard began to harangue me. I cannot remember exactly what she was saying but it was the usual abusive stuff. Ms Heard progressed into a continuous verbal barrage with which I did not engage and instead continued sketching. Throughout the course of our relationship, Ms Heard would often look to argue with me, berate me or abuse me verbally and physically. By the time at which the flight took place, I had worked out that the best way to deal with this was simply to not engage and to try to retreat from the situation, as I have stated above.

38. Further, given where I was sitting and the layout of the plane, it was physically impossible for me to have kicked Ms Heard in the back causing her to fall over. In fact what happened is that when Ms Heard stood up at some stage during the flight, I stretched my leg out to tap her playfully on the bottom with my foot to non-verbally communicate something along the lines of *“hey, c’mon let’s get past this”* in an attempt to make light of the argument and to try to defuse the situation, but I do not believe I was able to reach her. Ms Heard saw my attempt, however, and immediately took great offence at this act and continued to verbally berate me and gesticulate at me. Eventually, Mr Stephen Deuters, my personal assistant, and Mr Jerry Judge, my security guard, intervened to calm down Ms Heard. I believe that Mr Judge took her to a separate part of the plane and talked to her for the rest of the flight, and I had a brief conversation with Mr Deuters. I then took a pillow with me to the bathroom, locked the door

and slept on the floor to avoid confrontation. The flight then continued to Los Angeles without any further incident.

39. When we landed in Los Angeles, Ms Heard was clearly still angry and, as was often the case, she was looking for an argument. In the same way that I did not engage with her on the flight, I did not engage with her then.
40. The Defendants also allege that I was later apologetic and appalled at my behavior during the flight and cried when my assistant told me that I had "kicked" Ms Heard. This is incorrect. Mr Deuters had never said that I kicked Ms Heard. I thought it best to simply try to get rid of the argument on Ms Heard's own terms rather than keep pointlessly engaging. I understand that the Defendants also refer to a text message to Ms Heard which stated that: "*Once again, I find myself in a place of shame and regret. Of course, I am sorry... I will never do it again ... My illness somehow crept up and grabbed me... I feel so bad for letting you down.*" If and insofar this text message was sent at this time (and I do not remember whether it was), it would only have been sent to placate Ms Heard as to my drinking, and is categorically not any admission of any violence as she has falsely claimed.

August 17th, 2014

41. The Defendants also allege that on August 17th, 2014 Ms Heard and I were in the Bahamas on a trip to try to help me reduce my dependency on alcohol and/or drugs. They state that during this trip I had "*several manic episodes requiring medical attention*", as a result of which Dr Kipper was flown in to help assist. They state that I "*became angry and kicked and pushed Ms Heard to the ground, slapped her with an open hand, and grabbed her by the hair*" and that, allegedly, during this attack, I kicked a door so hard that it splintered.
42. It is right that on August 17th, 2014 Ms Heard and I were in the Bahamas. We were there on a trip to try to help reduce my dependence on prescription painkillers (Roxies, in particular); not alcohol and/or drugs, as is alleged. Insofar as there is any insinuation that I was dependent on any other drugs, I reject that insinuation completely.

43. Ms Heard was only present because she had insisted on accompanying me on the trip and took the place of Mr Nathan Holmes, my second personal assistant at the time. I required 24 hour medical care throughout the trip and was frequently sedated because of the physically painful process of withdrawal. I was being treated by a Registered Nurse, Ms Debbie Lloyd, but Ms Heard often intervened and withheld medicine from me which caused me substantial issues including spasms and other withdrawal symptoms. This was one of the cruellest things that she has ever done and I would not wish the pain that I had gone through upon anyone.
44. I did not have several manic episodes requiring medical attention whilst in the Bahamas, This is something that Ms Heard like to tell people, as it made me sound like a crazy person. I was struggling with the painful process of withdrawal, which was only exacerbated by the actions of Ms Heard. As stated above, Dr Kipper was flown in to assist Nurse Lloyd with my severe withdrawal symptoms.
45. At no point did I kick, push, slap or grab Ms Heard by the hair. I was not violent toward Ms Heard at this or any time, nor did I kick a door so hard that it splintered. Indeed, the picture of the broken door that Ms Heard submitted as "evidence" of this violent outburst in the related US Proceedings does not even exist in the Bahamas; it is a door from one of my then-penthouses in Los Angeles. I do recall an argument with Ms Heard on the evening of 17 August on this trip which was instigated by Ms Heard. As I often did, I tried not to engage with Ms Heard whilst she shouted at me and tried to separate myself from Ms Heard. Later in the evening, Dr Kipper and Nurse Lloyd came to the house in which Ms Heard and I were staying and I believe Ms Heard claimed I had pushed her. This did not happen but in any event, she certainly did not claim at the time that I had slapped and grabbed her by the hair.
46. I had found Ms Heard had made my recovery process in the Bahamas significantly more difficult, so upon our return to Los Angeles from the Bahamas, I asked Ms Heard to give me some space and paid for a suite for her and her friends at the Beverley Hills Hotel for five days so that I could recover undisturbed.

December 17th, 2014

47. I understand from my solicitors that the Defendants also allege that I had been violent towards Ms Heard on December 17th, 2014 and that afterwards I sent her text messages supposedly apologizing for my behaviour and calling myself a "*fucking savage*" and a "*lunatic*".

48. The Defendants' pleading does not even contain specific details of the violence alleged to have occurred on December 17th, 2014 and as such I cannot provide any detail as to what happened on this date. In any event, I deny that I have ever been violent towards Ms Heard in any way, at any time and that, insofar as any text message was sent (and I do not remember whether they were), the words in such a text message would not refer to any violence.

25 January 2015

49. The Defendants also allege that on or around January 25th, 2015 I "shoved Ms Heard, slapped her, and grabbed her by her hair" when we were in a hotel room in Tokyo. They state that, allegedly, when she tried to stand up, I "*muscled her back to the floor, stood over her and yelled.*"

50. Ms Heard and I were in Tokyo in or around January 25th, 2015 but at no point did I shove, slap or grab Ms Heard by the hair. As I explained above, I have never hit her in my life. My memory of the trip is that it passed without incident and Ms Heard was in unusually good spirits throughout. In fact, my children were on the trip with us and, as I have discussed above, it was always essential to me to ensure that my children do not witness even raised voices. I would have made sure of that.

March 2015

51. I understand from my solicitors that the Defendants allege that when Ms Heard and I were in Australia in March 2015, I had subjected her to "*a three-day ordeal of physical assault which left her with injuries including a broken lip, swollen nose, and cuts all over her body*".

52. Ms Heard and I were in Australia in March 2015 while I was working on the Pirates of the Caribbean film series. There was a significant argument between me and Ms Heard on 8 March 2015 during which I sustained a severe injury, as described below. The Defendants' allegation that this happened on 3/4 March 2015 is inaccurate. I did not subject Ms Heard to any physical abuse throughout this period. I was not violent towards Ms Heard in any way during this time, or at any time, and Ms Heard did not suffer any of the injuries. This was a highly difficult time for me with Ms Heard and there were a series of arguments, instigated by Ms Heard, but I did not commit any act of violence against Ms Heard. The only person who was harmed in Australia, grievously so, was me in March 2015, when, as I describe below, Ms Heard threw a vodka bottle at me that cut my finger off when the bottle exploded on the bar on which my hand was resting.

53. I understand from my solicitors that it is also alleged in the Amended Defence dated 21 June 2019 (the "**Defence**") that:

"The Claimant stayed up all night taking around eight MDMA (ecstasy) pills and drinking alcohol.

The following morning, the Claimant became physically abusive towards Ms Heard after she found a bag of MDMA pills and confronted him about his drugging. The Claimant argued that MDMA was not on his "not allowed" list, which Ms Heard disputed. In response, the Claimant swallowed more pills and chased them down with liquor."

54. I did not take MDMA or any other drugs in early March 2015 (the time to which the allegation refers to), which is the day that I describe below. Nor did Ms Heard find a bag of MDMA pills at that time. I also do not remember having any conversation about MDMA with Ms Heard at this time.

55. The Defence also states that:

"Ms Heard, concerned about the interaction of the various drugs the Claimant was taking, asked him what else he had taken that day. The Claimant screamed at her and grabbed her

by the wrist as she tried to leave the room, then violently dropped it and said words to the effect of "leave anyway". She left the room and barricaded herself into another room. The Claimant broke through the door and attacked Ms Heard. During the course of the day, the Claimant hit Ms Heard multiple times, shoved and pushed her to the ground, choked her, and spat in her face. The Claimant then handed her a liquor bottle that he was drinking from and asked her, "What are you going to do?" When Ms Heard threw the bottle on the floor, the Claimant responded by throwing cans and unopened glass bottles at her.

...the Claimant shoved Ms Heard into a ping pong table, threw bottles through the window panels of a glass door, then grabbed Ms Heard and tore off her nightgown. The Claimant grabbed Ms Heard by her hair and choked her against the refrigerator in the kitchen. The Claimant then threw Ms Heard away from him, and as she tried to run away the Claimant continued to throw objects and alcohol at her. The Claimant then grabbed Ms Heard by the neck and collarbone, slammed her against the countertop, and strangled her. Ms Heard's arms and feet were slashed by the broken glass on the kitchen countertop and floor. She was scared for her life and told the Claimant, "You are hurting and cutting me". The Claimant ignored her, continued to hit her with the back of one closed hand, and slammed a hard plastic telephone against a wall with his other hand until it smashed. While he was smashing the telephone, the Claimant severely injured his finger, cutting off the tip. Once Ms Heard had managed to escape from the Claimant, she barricaded herself in a bedroom."

56. The events described above did not happen as alleged. Immediately before March 8th, 2015, Ms Heard had a conversation with my then-lawyers, Bloom Hergott, who explained to her my intention to enter into a post-nuptial marital agreement to protect my assets. She was enraged that there would be a post-nuptial agreement and that she was not included in my will.

57. When I woke up in the morning of March 8th, 2015, which I recall was my day off, I found Ms Heard watching TV in the house where we were staying. She was still very angry with me, saying things to the effect that I don't care about her, that we don't even have joint credit cards and that I don't even want to look after her. What she was saying was utterly irrational,

but, as I always tried to do, I tried to calm her down, but I soon realised that it was impossible, so I did not want to engage with Ms Heard as I had learned from prior experience that there was no point in doing so: she would simply get more and more irate. Accordingly, I spent the day trying to avoid Ms Heard in the house and retreating from her when we came into contact. I believe the house in Australia had at least seven bathrooms and at various points I hid in all of them in order to avoid Ms Heard. However, she would go after me and endlessly hurt me with her insults. I remember asking her to stop fighting multiple times that day – one of those times for at least 45 minutes when I was sitting on the floor simply begging her to leave me alone. But she just wouldn't stop. The insults continued and she tried to hurt me as badly as she could, each time more and more.

58. At some point, I went to the downstairs bar in the house we had hired in order to avoid Ms Heard. However, Ms Heard followed me and continued screaming at me abusively. I cannot remember exactly what she was saying. Under the stress of the situation, I poured myself a glass of vodka and drank it. It was with this glass that I broke my sobriety, but I needed it to numb the pain that I was in as a result of Ms Heard's insults and behaviour.
59. When Ms Heard came down, she accused me of drinking again. I think I said words to the effect of "*yeah, apparently I am drinking again.*" This angered her hugely, so she walked around the bar area, took a bottle of vodka and threw it at me, narrowly missing my head and smashing into the mirror and bottles behind me at the bar. The first bottle she threw at me was a standard size 0.75cl bottle.
60. I tried not to react, so I got up and slowly walked around the bar myself, grabbed another, bigger bottle of vodka and poured myself another glass. This enraged Ms Heard further and she came over and grabbed the bottle from me. I then swung round behind the bar stool and Ms Heard threw that bottle at me as hard as she could from a fairly short distance. The bottle smashed against my hand, which was resting on the marble top of the bar, severing the top of my finger and fracturing multiple bones. A photograph of which is at 1 of Exhibit JD2. Despite the severity of this injury, Ms Heard continued shouting at me and then proceeded to put a cigarette out on my right cheek. A photograph of which is at 2 of Exhibit JD2. The

allegation that my finger was injured in the way that it was by smashing a plastic telephone against the wall is ludicrous. The injury, which amputated part of my finger, was very severe and required a significant amount of medical attention. The treating medical doctor said "*this is an injury of velocity.*" It could not have been caused in the manner alleged by Ms Heard. Initially, I did not feel the pain in my finger but felt some warmth. I then noticed that the top of my finger was missing and I was essentially looking at my bones. When Ms Heard saw this, she realised the severity of what she had done and she then freaked out and began shouting.

61. At this point, I was in a state of distress and severe shock. I do not have a specific recollection about what happened next. At some point after she threw the bottle that cut off my finger tip, Ms. Heard also put a lit cigarette out on my cheek. The severity of these injuries brought about the personal realisation of the severity of the abuse that Ms Heard had inflicted upon me for so long. I couldn't believe that we had come to this. I wondered what more she could do to me.
62. I admit that at this time I wrote on a mirror and walls in blood and paint but my precise recollection of that particular time is not good given the state of shock I was in. There was an incident once when Amber lied to me about Billy Bob Thornton, so I wrote his name. Other than that, I do not recall exactly why I wrote what I wrote. I was in a terrible state. At this point in the day, Ms Heard had gone upstairs to the bedroom of the house and I was downstairs. At some point, I realised that I would need medical assistance and so she then head of my security, Jerry Judge came to the house along with some others. I cannot remember exactly who was present as I was delirious from the pain.
63. I believe we then went to a hotel where other members of my team were staying and in which I had a room. On arrival at the hotel, we went up to a hotel room where my team, including Mr Deuters, looked at the injury to my finger, which had been covered until this point, and we decided that we needed to immediately go to the hospital. I was in considerable pain and distress at this point but I believe that Mr Judge and Mr Connolly then drove me to the hospital where we stayed for a couple of hours whilst my finger was being treated. I do not

remember much of this period but I believe I was taken to the hospital around 6.30 p.m. on March 8th, 2015.

64. Having been treated at the hospital for at least a couple of hours, I then returned to the hotel where I went to sleep. Over the course of the next few days I told my various employees what had actually happened to cause the injury to my finger, as described above. However, I did not want it to attract press attention or distract from the filming of *Pirates of the Caribbean*. Accordingly, I instructed my various employees to say, if asked, that I had had an accident where I had caught my finger in a door.
65. After I left the house with my finger injury, I did not see Ms Heard again until I returned to America later in the month. Either the next day or very shortly after, the house manager Mr Ben King, accompanied Ms Heard on a flight back to Los Angeles. Mr King attested that Ms Heard confessed to him on the flight home: *"Have you ever been so angry with someone that you just lost it?"*

March 2015

66. I understand from my solicitors that the Defendants also allege that in March 2015, when Ms Heard, her sister and I were in Los Angeles, I allegedly *"began to destroy personal property in the house, including Ms Heard's belongings in her closet"*. The Defence goes on to state that I also hit Ms Heard hard and repeatedly and that, when I then lunged to hit Ms Heard again, Ms Heard's sister placed herself between them to try to interrupt the fight. I then allegedly turned my attention to Ms Heard's sister, who was standing at the top of a flight of stairs, reached out with one hand and shoved Ms Heard's sister, causing Ms Heard to believe that I was about to push her sister down the stairs.
67. I fully deny this allegation. I returned from Australia to Los Angeles in mid to late March 2015. Around the 22 March 2015, I was at Penthouse 5, Eastern Colombia Building (**"Penthouse 5"**) with Ms Heard and her sister. Ms Heard was in an extremely argumentative mood and kept trying to provoke me to have an argument with her. I cannot remember the

specifics of this particular argument but Ms Heard always managed to find something to try to argue about. We did begin arguing but I was not violent towards Ms Heard or her sister in any way at this, or any time. It is an absurd lie that Ms Heard employed, that she feared I was about to push her "baby sister" down the stairs. That is not what occurred, nor did it appear that it was going to occur, as Ms Heard could see with her own eyes at the time. Ms Heard was in fact trying to prevent me from leaving the property and berating me in another rage. As I have said, I cannot remember precisely what this particular rage was about.

68. As a result, I summoned Nurse Lloyd and one of my security guards, Travis McGivern, to intervene. When they arrived, Ms Heard and I were having a verbal argument which lasted 60 to 90 minutes. At some point during this argument, I turned to leave and Ms Heard threw a can of Red Bull at me, striking me in the back. Shortly after, Ms Heard threw her purse at me which was blocked from hitting me by Mr McGivern. During this argument, Mr McGivern was trying to protect me by standing between me and Ms Heard, but Ms Heard still managed to lunge and punch me in the face with a closed fist. This caused visible swelling and injury. Shortly after I had been hit, I left the premises along with Nurse Lloyd and Mr McGivern.

August 2015

69. It is also alleged in the Defence that when Ms Heard and I were travelling on the Eastern Oriental train in Southeast Asia, I picked a fight with Ms Heard, hit her, and pushed her against a wall by grasping her throat and holding her there, allegedly causing her to fear for her life.

70. In August 2015, Ms Heard and I were travelling on the Eastern Oriental train in Southern Asia. However, I was not violent towards Ms Heard in any way at this, or any other time.

71. Once we had returned from Southeast Asia, I do remember a particular argument that took place with Ms Heard in September 2015 around the time of the Toronto and Venice Film festivals, which both take place in early to mid-September. Ms Heard and I had attended the premiere of *Black Mass*, a film in which I was the lead role, and I had sent Ms Heard into the

cinema while I continued to sign autographs on the red carpet. I always try to make an effort to sign autographs for people who appreciate my work and who have taken the time to come out and show their support. The next day, or shortly thereafter, a film in which Ms Heard had a very minor role, *The Danish Girl*, was due to premiere. I received a call from my agent asking me not to escort Ms Heard on the red carpet because, given how much attention I had received at the previous premiere, this would be likely to steal the lead actor's, Eddie Redmayne's, thunder. I did not want to do that and agreed not to go on the red carpet and told Ms Heard of my intention. At this point, she flew into a rage and said I was a "horrible person" who did not support her "art."

72. I ended up going to the premiere and Ms Heard was as charming as could be but I could see that she was holding a grudge and it was only a matter of time before it surfaced. This was something that happened repeatedly in our relationship: she would bear a grudge, often for weeks, but it would take time for her anger to surface. On this occasion, it was on the way back to our hotel room when she snapped and called me a "fat old man" and hurled other abuse at me.

73. This whole period and the period for the rest of the year was one in which Ms Heard was incredibly violently and verbally abusive to me. I remember one incident around 22 October 2015, when I texted Ms Heard's mother, Paige Heard as follows:

"My sincere apologies, darling Paige...But, today/tonight she threw a fit, which I could feel coming...apologized to her 1,000 times because I ruined her night by hiding in the only place she can't get to me, my bathroom, and texted with Jack for a bit and then showered...Because she was hateful, hurt and treated me like scum of the earth..."

...

As I walked out of the door, she burst out and began her hugely insulting TIRADE by throwing a full bottle of iced tea at the back of my head...I have now left...I actually had to ask Security to come in and intercede, just like I did the last time she punched me in the jaw a couple of times (which has happened on numerous occasions)..."

74. This is just one example of the many abusive incidents to which I was subjected. As I said to Ms Heard's mother Paige Heard, I had been punched by Ms Heard on numerous occasions, some of which Ms Heard even confessed to under oath in her prior deposition.

26 November 2015

75. At paragraph 8.a.14 of the Defence, it is alleged that on 26 November 2015:

"...Ms Heard and the Claimant were in Los Angeles. The Claimant ripped her shirt and threw her around the room. He threw a wine glass and a heavy glass decanter at her, which missed her. The Claimant also pushed Ms Heard, causing her to fall over the back of a lounge chair and hit her head against a brick wall which resulted in a lump on the back of her head and a split lip."

76. On 26 November 2015, Ms Heard and I were indeed in Los Angeles together celebrating Thanksgiving. However, I have never abused Ms Heard in the way alleged or at all.

15 December 2015

77. I understand from my solicitors that at paragraphs 8.a.15 - 8.a.20 of the Defence it is alleged that on 15 December 2015:

"... Ms Heard and the Claimant were in their penthouse in Los Angeles. The Claimant threw another decanter at her, knocked items around the room and punched the wall. He slapped her hard, grabbed her by her hair, and dragged her through the apartment. In the process, the Claimant pulled large chunks of hair and scalp out of Ms Heard's head.

a.16. Ms Heard tried to escape the violence by going upstairs. The Claimant followed Ms Heard, hit her in the back of her head, again grabbed her by her hair, then dragged her by her hair up the last few steps. At the top of the stairs, the Claimant shoved her twice, which made her fear that she would fall. Ms Heard told the Claimant that he had broken her wrist in an attempt to get him to stop.

a.17. The Claimant repeatedly hit Ms Heard, knocking her to the floor. Each time Ms Heard was knocked down, she stood back up. The Claimant responded by veiling, "Oh, you think you're a fucking tough guy?" He then head-butted her in her face, bashing her nose, which immediately began bleeding and caused her searing pain. When Ms Heard said to the Claimant, "You head-butted me", he responded, "I just gave you a little knock with my head". The Claimant then said what a "fuck up" he was and left the room. Later, Ms Heard told the Claimant that she wanted to leave him, and that she would call the police if he ever touched her again. When she then began to walk away towards the guest apartment, the Claimant pushed her. He then grabbed her and pulled her from one room to the next, gripping her by her hair.

a.18. By the time the Claimant had dragged Ms Heard into the upstairs office, she had told him she was leaving him as she could not put up with his behaviour any longer. The Claimant reacted by grabbing Ms Heard by her throat, pushing her down to the ground, and punching her in the back of her head. The Claimant grabbed Ms Heard by her hair, slapped her in the face, and screamed at her, "I fucking will kill you - I'll fucking kill you, you hear me?" or similar words.

a.19. The fight continued onto a bed. The Claimant got on top of Ms Heard and placed his knee on her back and the other foot on the bedframe while repeatedly punching her in her head. The Claimant screamed, "I fucking hate you" over and over again. The bedframe splintered under the weight of the pressure of the Claimant's boot. The Claimant hit Ms Heard with his closed fists, pushed her face into the mattress, and pulled out chunks of her hair. Ms Heard screamed and feared for her life. She suffered severe headaches and other pain for at least a week after this incident.

a.20. During this incident, the Claimant also wrote a message on the kitchen countertop in gold pen that said, "Why be a fraud? All is such bullshit".

78. I was at the penthouse in which I lived with Ms Heard on 15 December 2015 but I was not violent toward Ms Heard in any way. In fact, on this date, Ms Heard violently attacked me

(as she had done many times before) leaving me with a number of scratches and swelling around my face. Ms Heard has fabricated these allegations, including falsely claiming that the blond hair on the floor was her hair that had been pulled out by me.

79. I remember this period as one in which Ms Heard was continually trying to argue with me and at times would physically assault me. Clearly, if Ms Heard had actually been assaulted in the way described above she would have had very severe and visible injuries. There is no evidence whatsoever of this having been the case. And indeed, just the next day, she taped an episode of James Corden's talk show, where the visible absence of any injury is apparent. Ms Heard's stylist, Samantha McMillen, worked with Ms Heard many hours the afternoon of December 16, 2015 preparing for the Corden show. I understand from my US lawyers that Ms McMillen gave a declaration that a makeup-free Ms Heard had no marks on her whatsoever. Yet after the show was over, Ms Heard said to Ms McMillen "*Can you believe I just did that show with two black eyes.*"

21 April 2016

80. It is alleged at paragraphs 8.b and 8.c of the Defence that on April 21st, 2016:

"... Ms Heard had a birthday celebration with friends at the couples' property at 849 South Broadway, Los Angeles ("the South Broadway apartment"). The Claimant arrived, drunk and high on drugs. After the guests had left the Claimant and Ms Heard had a conversation about his absence from the celebration. This deteriorated into an argument. The Claimant threw a magnum sized bottle of champagne at Ms Heard which missed and hit a wall and threw a glass of wine over Ms Heard, which smashed."

81. On April 21st, 2016, Ms Heard did hold a birthday celebration at our penthouse at 849 South Broadway, Los Angeles (the "**South Broadway Apartment**"). I know that I was about 1 hour and 40 minutes late to the party because I was at the meeting with a recently hired business manager and his accountants. Earlier that day I told Ms Heard that I had an important meeting and during the meeting itself I texted her to say that the meeting was

likely to finish far later than the birthday dinner was scheduled to start. Despite this Ms Heard was cold towards me when I arrived.

82. Following the events of the meeting, I was in a state of shock, having learned about the state of my business affairs at that point in time. It is alleged at paragraph 8.b that I arrived "*drunk and high on drugs*". I was not intoxicated in any way on this date, as the business manager with whom I had been meeting with for hours before leaving for the party has testified. I was just tired and subdued. After the party was over, I went to bed and began reading in the penthouse.

83. At paragraph 8.c of the Amended Defence it is alleged that:

"The Claimant then grabbed Ms Heard by the shoulders, pushed her onto a bed, and blocked the bedroom door when she tried to leave. The Claimant then grabbed Ms Heard by the hair and violently shoved her to the floor. The Claimant screamed at and threatened Ms Heard, taunting her to stand up and saying "You really think you're that tough, huh? Tough guy" and similar words. When she stood up, the Claimant shoved her down again. Ms Heard eventually escaped from the bedroom and walked through the office, at which point the Claimant pushed Ms Heard and grabbed her by the back of her hair. Ms Heard then returned to the bedroom and the Claimant pushed her again. When Ms Heard lifted her arms to defend herself, the Claimant pushed them down and bumped his chest into hers, causing her to fall back onto the bed. Ms Heard tried to walk past the Claimant to leave the bedroom, but he pushed her to the floor. After this he stormed out of the apartment, tossing aside and smashing items as he left."

84. In fact, Ms Heard, who had been drinking heavily, became aggressive and violent towards me and punched me twice in the face as I lay in bed reading, causing an injury to my face. After the first punch to my face, I did not defend myself. After the second punch to my face, I defended myself by grabbing Ms Heard's arms to stop her punching me again and told her to stop. I then told her I was leaving and that she should not follow me. I called Mr Sean Bett, a member of my security team who was stationed at the penthouse apartment next door,

and who had been previously a 14 year veteran of the LA Sherriff's Department, and asked him to drive me home to West Hollywood. I explained to him that Ms Heard was "*at it again*" or words to that effect. I did not smash or toss aside any items as I was leaving. Mr Bett took me to my house and insisted on taking a photograph of the injury caused to my face by Ms Heard during the incident and then took me to my house.

85. I understand that the following morning Ms Heard (or possibly one of her friends) defecated in our shared bed. On 12 May 2016, Ms Heard confessed to our estate manager, Kevin Murphy, that leaving the feces in the bed had been "*just a harmless prank*" thereby effectively acknowledging that she had been responsible, whereas she had previously sought to blame our dogs that were both too tiny to jump onto the bed nor able to leave feces like that which was deposited on the bed. I resolved to divorce Ms Heard on that day.

86. Soon after, I explained the incident to Ms Heard's father, David Heard, by text on 11 May 2016:

"...we've not spoken to one another since I left at 4:30am on the morning of the 22nd, her birthday, the argument, once again, brought her straight to that uncontrollable rage and she started throwing fuckin' haymakers around again, I cannot allow ANYONE to believe that it's okay to insult me, disrespect me and then feel as though she can apply violence to a situation that is already spinning out of control..."

21 May 2016

87. I understand from my solicitors that at paragraphs 8.d of the Defence it is alleged that:

"The next time Ms Heard saw the Claimant was on 21 May 2016. He arrived at the South Broadway apartment at around 7.15 pm. He was drunk and high. Ms Heard was present together with Elizabeth Marz, Raquel Rose Pennington and Ms Pennington's fiance Joshua Drew. Ms Pennington and Mr Drew lived in a neighboring apartment, and Ms Pennington kept a key to the South Broadway apartment."

88. Since the incident on April 22, 2016, Ms Heard had repeatedly tried to contact me either directly or through her sister, Ms Whitney Heard, who continuously asked me to get back in touch with Ms Heard. The next time Ms Heard and I saw each other was on 21 May 2016. Prior to arriving to pick up my things on May 21st, 2016, I told Ms Heard on the phone that the relationship had not worked out and that I was going to file for divorce. I promised that I would file in a low-key way that would not make her look bad. Then several hours passed before my arrival at my Penthouse 3. I do not remember the exact time we arrived at the South Broadway Apartment, but it was a little after 8 pm. The South Broadway Apartment has multiple penthouses, some of which are adjoining. Penthouse 3 is where Ms Heard alleged the abuse occurred that day, and where Ms Heard and her friends testified that I swung a magnum sized wine bottle leaving a carnage of smashed fruit, cutlery, glassware, candelabras and spilled wine in Penthouse 3. A diagram showing the location of each penthouse is at pages 3 of Exhibit JD2.

89. I did not know who Ms Elizabeth Marz was, concluding that she was another friend of Amber's living rent-free in my penthouses, but I remember observing some woman who was with Mr Drew in Penthouse 5. To the best of my knowledge Ms Heard was alone at the Penthouse 3 when I arrived; although it now appears that Ms Pennington was hiding in Penthouse 3's coat closet just inside the door, because my two guards were, unbeknownst to both Ms Pennington and Ms Heard, guarding the door that was the only way in or out of Penthouse 3. So she had to already have been inside Penthouse 3, waiting in ambush for me with Ms Heard. A number of Ms Heard's friends including Ms Pennington, Mr Drew and Ms Marz lived and worked out of the South Broadway Apartment rent-free for approximately 4 years.

90. I understand from my solicitors that paragraph 8.d of the Defence alleges that I arrived "*drunk and high*" on drugs and became very angry during a conversation with Ms Heard. In fact, I arrived sober accompanied by members of my security team, Mr Bett and Mr Judge. I had concerns around what Ms Heard might do on this occasion based on all the physical and verbal abuse I had already received from her. I wanted to collect some of my belongings.

The security guards waited immediately outside the door of Penthouse 3. I was in the apartment for approximately 10 minutes in total.

91. At paragraphs 8.e - 8.i of the Defence, it is alleged that while I was in the apartment:

"e. During a conversation with Ms Heard the Claimant became very angry. Ms Heard tried to calm him down by telephoning one of his trusted employees and asking him to intervene, but this was unsuccessful.

f. The Claimant became increasingly enraged. Ms Heard became concerned for her safety and texted Ms Pennington who was by now in her apartment next door, asking Ms Pennington to come back over.

g. The Claimant insisted that Ms Heard call their friend iO Tillet Wright, which Ms Heard attempted to do. The Claimant ripped the phone from Ms Heard's hand and began screaming profanities and insults. The Claimant then tossed the phone away and stormed upstairs. Ms Heard picked it up and Ms Wright yelled over the phone to Ms Heard to get out of the house. After a short period upstairs, the Claimant came back down the stairs then grabbed the phone again and this time threw it at Ms Heard, striking her cheek and eye. Ms Heard sustained an injury to her right eye. Ms Pennington subsequently took a photograph of the injury as well as of items which the Claimant smashed.

h. Ms Heard covered her face and was crying with pain. The Claimant charged at her. He forcibly pulled back her hair and Ms Heard attempted to get up from the sofa. Ms Heard called out "Call 911", hoping this would be heard by Ms Wright who was still on the phone. The Claimant shouted "I hit your eye? I hit your eye, huh? Let me see your eye. Let me see. Let me see your eye. What if I pulled your hair back? Let's see how hard I hit you", pulled Ms Heard's hair, struck Ms Heard and violently grabbed her face. The Claimant started to slap, shake and yank Ms Heard around the room while she continued to scream."

92. Once I arrived into the apartment, I telephoned Mr Murphy from downstairs to confirm to Ms Heard what he earlier told me about her confession that the defecation incident on 22 April

2016 was "*just a harmless prank*." Mr Murphy repeated that Ms Heard admitted to him that she was responsible. Ms Heard screamed and swore at Mr Murphy, repeatedly called him "*a fucking liar*." I asked Ms Heard not to speak to Mr Murphy in that manner and told her again that I wanted a divorce. Mr Murphy hung up the phone as Ms Heard would not stop screaming.

93. I went upstairs to collect my belongings. Ms Heard was downstairs; she telephoned Mr iO Tillet Wright and began speaking loudly on the phone about me and the defecation incident in a mocking and goading manner. I did not rip the phone out of Ms Heard's hand, as is alleged at paragraph 8.g of the Defence. I went downstairs, took the phone in order to speak to Mr Wright and told him "*You got what you want, you can have her. I don't care, it is over*," or words to that effect. I then tossed the phone next to Ms Heard and onto the sofa on which she was sitting. I then crossed the room away from Ms Heard towards the kitchen which was approximately 20 feet away from the sofa. I did not "*storm*" upstairs or come back down to take the phone for the second time.

94. I have also been told by my solicitors that it is alleged that:

"i. Ms Pennington entered the flat, at which point Ms Heard escaped from the Claimant's grasp and moved to the other side of the room. The Claimant charged at Ms Heard again. Ms Pennington ran between them, extending her arms to separate them and begged the Claimant to stop. The Claimant then grabbed Ms Pennington's arms and continued to yell obscenities."

j. Ms Heard then retreated to the couch. Ms Pennington came over and covered Ms Heard in a protective posture. The Claimant picked up the magnum size bottle and began drinking out of it and swinging it around, smashing everything he could.

k. The Claimant then moved closer and closer to Ms Heard, acting in a threatening manner. By this time members of the Claimant's security team, including Judge Jerry, had entered the flat. Ms Heard yelled at Mr Jerry to help her and said that if the Claimant hit her again she would call the police.

l. As the Claimant walked down the hallway he smashed other items and kicked a hole in a door. He went into an adjoining apartment, which Ms Heard used as an office, painting studio and closet, where Ms Heard heard him smashing further items and screaming."

95. Ms Pennington certainly did not "enter the flat", as my guards who were guarding the only door to the Penthouse 3 would have seen and stopped her. It appears that she was hiding in the coat closet just inside the door, because suddenly Ms Pennington appeared and bolted past my right shoulder to run to Ms Heard's side. I did not touch Ms Pennington during the entire time she was there and I did not verbally or physically abuse Ms Pennington in any way at this, or any time. Ms Pennington was shouting: "*don't do it, stop it, leave her alone,*" or words to that effect. As I was crossing the room toward the kitchen, Ms Heard also began shouting "*Stop it Johnny. Stop hitting me Johnny!*" Hearing the shouting, the security guards stationed outside immediately opened the door and rushed into Penthouse 3 via the kitchen where I was standing. Immediately upon opening the door the security guards observed me standing in the kitchen, far away from Ms Heard, while she was shouting into the phone "*stop hitting me Johnny*" or words to that effect.

96. Ms Heard was visibly shocked when the guards entered and both Ms Heard and Ms Pennington began to feign crying. Ms Heard changed from present tense to the past tense and said: "*he hit me with a phone*", "*that's the last time you hit me Johnny*" and "*you better not hit me again*", or words to that effect. I did not move but said to Ms Heard: "*what are you talking about? You're crazy. I didn't hit you.*" Ms Heard screamed "*call 911*", presumably because Mr Wright was still on the phone. Mr Wright later testified under oath that he "*called 911 to save her life.*" But this too is a lie. When I was shown the police call log, neither the call to 911 nor the police dispatch occurred for much more than an hour after I left at 8:29. Mr Judge, my security guard, told me: "*Let's just get out of here, boss*" and immediately took me out of the door. The time between the guards entering and leaving with me was less than 1 minute.

97. I did not break any items in Penthouse 3, or 5, or anywhere else. I did not kick a hole in the door. I was not swinging a bottle of any size around the room. I did not create the

picturesque carnage in Penthouse 3 that Ms Heard and her friends described, including broken fruit, candelabras, cutlery, glass and spilled wine everywhere. Two domestic-abuse trained police officers, who attended the property shortly after the alleged incident, inspected the property and saw no spilled wine, broken glass or any sign of disturbance whatsoever. Ms. Heard and her friends have testified in the related US proceedings that they did not clean up the "destruction" before the first set of two police officers arrived. And then two more officers responded, and they had the same findings of no damage to property or Ms Heard. I am aware that Ms Pennington took photographs, curiously with no attendant meta-data showing their provenance, of some purportedly smashed items; however, those items were not smashed by me on May 21st or ever.

98. I understand that those two police officers, who visited the apartment the night of the alleged incident, interviewed Ms Heard twice in good light and noted no injuries, bruising, marking or swelling on Ms Heard's face or body. When one of the officers asked Ms Heard what happened, she responded "*nothing*". When Ms Heard was asked if she was hurt, she shook her head. Ms Heard did not tell the officers that she had been assaulted; she said she was not injured and refused medical treatment. According to the police officers' testimony, Ms Heard said she did not want to make a police report and that there was nothing wrong. I am aware that Ms Pennington took some photographs of Ms Heard's face allegedly showing injuries that I had caused on May 21st, 2016. Ms Heard had no visible injuries on this date, as attested to by the officers who had attended the South Broadway Apartment that evening. Thus, as far as the photographs taken by Ms Pennington are concerned, these "injuries" could not have been caused by me on May 21st, or ever, because I did not do anything to cause any such injuries.

99. After leaving Penthouse 3, Mr Judge, Mr Bett and I went to Penthouse 5 where we discovered Mr Drew, a woman (whom I now understand to be Ms Marz) and a dog. It appeared that they had been using my apartment to operate some sort of craft beading business. I told them to leave and they did. We then left the apartment just before 8.30 p.m.

The TRO Application

100. On 27 May 2016, Ms Heard filed the TRO Application, which provided the Defendants with the “evidence” on which they originally relied for the Article and in which she alleged I had physically abused her on 21 April 2016 and 21 May 2016.
101. I was absolutely shocked when the TRO Application was filed. I could not believe that, when I had suffered so much abuse from Ms Heard, I was now being accused of abuse that had not happened, particularly given the true accounts of what had happened on these dates as set out above.
102. I texted both Amber’s mother and her father at this time expressing my disbelief and setting out what had actually happened.
103. On 27 May 2015, I sent the following text to Ms Paige Heard (page 4 of Exhibit JD2):

“...i will never understand how we got here, my love for your daughter has been constant and impenetrable!!! but, we are divorcing because i was 2 hours late for her birthday dinner, because i was in a meeting with new business manager and the bank, as my former business manager fucked me over royally... also, she knew i was going to be late!!! i texted her from the meeting... she treated me like a red-headed stepchild in front of all her friends and it only got worse when we came home, she got violent and i left, as i always do when she decides to get violent with me. her charges against me are simply not true, i DID NOT throw her phone at her!!! i was facing away from her to walk away and lobbed it over my shoulder... i had no idea that she wouldn't just catch it, or if would land on he couch... and then, of course, rocky comes to the rescue, as if i am some goddam psycho beast, the timing is ugly, my mom passed away... amber, the love of my life, can no longer exist in me... to perjure herself against me is too far!!! i don't deserve this, paige... but, if this is what's happening??? this is what i must deal with, apparently she's back with tasyafantasia. i don't know what has ever been true, or what has been a lie. though, i miss her and, of course, stupidly, still love her with everything in my bones... i guess i just couldn't make her smile anymore... and that is all i've ever wanted!!! gonna call you in a bit, if you're okay with that... i love you, my dear paige... i miss you very much. xxx... jd”

104. On the same date I texted Mr David Heard as follows (pages 4-5 of Exhibit JD2):

“how you feeling??? nah... fuck that... what drugs are they giving you?? i cannot believe what’s going on!!! Amber is calling this domestic violence!!! she submits a picture that says i threw the phone at her!!! she is putting herself in deep trouble if she continues to perjure herself... i have done nothing to deserve this!!! this is so fucking sick... i have never been charged, nor arrested for domestic violence!!! SHE HAS!!! twice, this all makes me sick to my stomach... i worshipped her and have been betrayed by the very love of my life... fuck it... she killed it. i guess i was so bad that it was fine for her to leave me and go to Coachella for 4 fucking days with all of her girlfriends and to not give her birthday to us!!! the festival and her friends were clearly more important than working things out with me... with these lies she is spewing to save her ass in the press, the truth will always catch up... and the truth will be a bitch... AND I HAVE NOT SAID A WORD!!! i have 2 witnesses who were in the room when she said that i flung the phone at her. ABSOLUTE FUCKING LIE!!! she wants a divorce, she get’s it. but the world will receive the truth and if she is caught perjuring herself (which she will), Australia could reopen their case against her to investigate whether, or not... she has filed a restraining order against me, man... cruel and unforgivable... i’ve done nothing but love her... anyway, the you have it, brother... i hope she’s happy now.”

105. Ms. Heard’s father replied shortly after stating (page 5 of Exhibit JD2): *“The lawyer told her she had to or she would have no place to live in 30 days”* To which I replied: *“that is absolute bullshit!!! HER LAWYER ASKED FOR TWO WEEKS at the downtown place... AND I SAID, “NO”!!! SHE COULD STAY THERE AS LONG AS SHE LIKED!!! WHY WOULD I FORCE HER OUT IN 2 WEEKS??? I AIN’T NO SCUMBAG!!! dude, my fucking wedding ring is still on me!!! i has not taken it off, because i love her... it is coming off now. what a fucking knife to the back, i’m so disappointed and so hurt... it’s just too much... x... later, brother...feel better!!! Jd”*

106. Around the same time, I received the following text from Ms Paige Heard which confirmed what David Heard had told me (page 5 of Exhibit JD2):

"It's the lawyers on both sides doing this not Amber. I heard the whole story very teary - if I could just talk to Johnny. She didn't want this. Friggin lawyers on BOTH sides!! This was not her idea not her wishes. She was told she would be evicted and out in 30 days if she did not do this"

107. Ms. Heard's mother then confirmed this again texting me (page 6 of Exhibit JD2):

"Yes it was! I am sure. Her dumb lawyer possibly as the only way she would have a place to live in 30 days. She DID NOT want to do this I swear to you. The lawyers are frigging things up"

108. I simply could not understand why Ms Heard was now seeking to show me as some kind of violent wife-beater when I had never abused her. I expressed this to her mother Ms Paige Heard as follows (page 6 of Exhibit JD2):

"if she didn't want to file a restraining order against me and send a message to the world that i am some kind of violent wife beater ...then why would she go to the courthouse with a photo of her that looks like she's been abused??? this is my life too, what are my children and my children's friends supposed to think??? I do not deserve this, and they do not deserve this... especially not from her."

109. She replied to me stating (page 6 of Exhibit JD2):

"Her lawyer told her she had to and she had to today. That's why she wanted to talk to you. We didn't talk so please never bring this up. But I'll swear to you this was not her idea nor did she do it willingly or happily. She was told it was her ONLY option to not being kicked

On behalf of: Claimant
Witness: John Christopher Depp II
No: Second
Date: 12 December 2019

out. I'm not making excuses but that is what she believed. She did not want to do it. She felt she was betraying her only love but the lawyers said so.

...

Please don't pass this on if you ever talk to Amber again. I love you, son"

110. In any event, the TRO Application was dismissed with prejudice on 16 August 2016. The way in which the Defendants subsequently reported Ms Heard's accusations in the Article differed from the many other articles that reported Ms Heard's accusations in that they adopted them as true and used those lies to suggest that I was guilty, on overwhelming evidence, of abusing Ms Heard. This is despite the fact that prior to the publication of the Article, The Sun had previously reported the fact that the TRO Application had been dismissed and that there was evidence from two police officers who attended the scene on 21 May 2016 which directly contradicted Ms Heard's account of events, as they had not seen any injury to Ms Heard or any damage in the apartment.

Reputation

111. I reiterate what I have said throughout this witness statement: at no point have I ever been physically abusive to Ms Heard. I strongly object to the Defendants rehashing allegations of abuse against me, the veracity of which have never been tested, in order to attempt to sell more newspapers. In their efforts to defame me, Defendants even lied about the substance of their interview about me with real #MeToo victim Katherine Kendall. Ms Kendall has testified and provided her text messages with the Defendants showing their misuse of her and the #MeToo movement for the purpose of defaming me. I have suffered significant reputational damage as a result of these allegations and continue to feel the effects of that damage, both in terms of my career (and by ability to be cast in films) and personally. The Defendants have simply sought to rely on and adopt these untested allegations and use them against me in order to defame me.

On behalf of: Claimant
Witness: John Christopher Depp II
No: Second
Date: 12 December 2019

112. I believe the Article has significantly damaged my reputation both worldwide and in the UK. Certainly it has caused me immense distress that those who have seen my films and know my work should believe me capable of the vicious conduct alleged.

On behalf of: Claimant
Witness: John Christopher Depp II
No: Second
Date: 12 December 2019

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

Signed:

John Christopher Depp II

Date: 12 December 2019

On behalf of: Claimant
Witness: John Christopher Depp II
No: Second
Date: 12 December 2019

Claim No. HQ18M01923

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

BETWEEN:

JOHN CHRISTOPHER DEPP II

Claimant

- and -

(1) NEWS GROUP NEWSPAPERS LTD

(2) DAN WOOTTON

Defendants

**SECOND WITNESS STATEMENT OF
JOHN CHRISTOPHER DEPP II**

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VIRGINIA :

IN THE CIRCUIT COURT OF FAIRFAX COUNTY

JOHN C. DEPP, II

Plaintiff,

v.

AMBER LAURA HEARD

Defendant.

Civil Action No.: CL-2019-0002911

**DEFENDANT AMBER LAURA HEARD'S RESPONSES AND OBJECTIONS TO
PLAINTIFF'S FIRST REQUESTS FOR ADMISSION**

Pursuant to Rule 4:1 and 4:11 of the Rules of the Supreme Court of Virginia ("Rules"), Defendant Amber Laura Heard, by and through her attorneys, submits these responses and objections (the "Responses") to Plaintiff John C. Depp's First Requests for Admission dated November 25, 2019 (the "Requests").

GENERAL OBJECTIONS

The following general objections and responses (the "General Objections") are incorporated into each specific objection and response (the "Specific Objections") as if fully set forth therein:

1. Defendant objects to Requests as violative of Rule 4:11(e)(1), which prohibits parties from serving more than 30 requests for admission, including all parts and subparts, that do not relate to the genuineness of documents, without leave of Court. Plaintiff's First Requests for Admission consist of 157 requests for admission, more than 5 times the number permitted, in flagrant violation of the Rules. (In contrast, Defendant served only 15 Requests for Admission on Plaintiff.)

2. Defendant objects to the Requests to the extent they purport to call for information that: (a) is subject to the attorney-client privilege; (b) constitutes attorney work product; (c) includes information protected from disclosure based on common interest or a similar privilege; or (d) is otherwise protected from disclosure under applicable privilege, law, or rule. Defendant will not provide such information in response to the Requests, and any inadvertent provision thereof shall not be deemed a waiver of any privilege with respect to such information.

3. Defendant objects to the Requests to the extent that they are vague and ambiguous and to the extent that they seek irrelevant information for which identification, collection, and review would be disproportionate to the needs of the case.

4. Defendant's responses to the Requests are made to the best of Defendant's present knowledge, information, and belief. These Responses are at all times subject to such additional or different information that discovery or further investigation may disclose and, while based on the present state of Defendant's knowledge and investigation, are subject to such additional knowledge of facts as may result from further discovery or investigation.

5. Defendant reserves all objections and rights with respect to the competency, relevance, materiality, privilege, or admissibility of Defendant's responses herein as evidence in any subsequent proceeding in, or hearing in connection with, this or any other action, for any purpose whatsoever.

SPECIFIC OBJECTIONS AND RESPONSES

1. Admit that you are paying the legal fees and expenses for Joshua Drew in connection with this Action.

ANSWER: Ms. Heard admits that, given the aggressive questioning by Mr. Depp's counsel, she paid for Joshua Drew to have his own lawyer present in order to make objections on Mr. Drew's behalf in connection with his deposition in this Action.

2. Admit that you are paying the legal fees and expenses for Elizabeth Marz in connection with this Action.

ANSWER: Ms. Heard admits that given the aggressive questioning by Mr. Depp's counsel, she paid for Elizabeth Marz to have her own lawyer present in order to make objections on Ms. Marz's behalf in connection with her deposition in this Action.

3. Admit that you are paying the legal fees and expenses for Ellen Barkin in connection with this Action.

ANSWER: Ms. Heard denies that she is paying legal fees and expenses for Ellen Barkin in connection with this Action.

4. Admit that you are paying the legal fees and expenses for iO Tillett Wright in connection with this Action.

ANSWER: Ms. Heard admits that given the aggressive questioning by Mr. Depp's counsel at depositions, she agreed to pay for iO Tillett Wright to have his own lawyer present in order to make objections on Mr. Wright's behalf in connection with his deposition in this Action.

5. Admit that you are paying the legal fees and expenses for Raquel Pennington in connection with this Action.

ANSWER: Ms. Heard admits that given the aggressive questioning by Mr. Depp's counsel at depositions, she agreed to pay for Raquel Pennington to have her own lawyer present in order to make objections on Ms. Pennington's behalf in connection with her deposition in this Action.

6. Admit that you are paying the legal fees and expenses for Tasya Van Ree in connection with this Action.

ANSWER: Ms. Heard admits that given the aggressive questioning by Mr. Depp's counsel, she paid for Tasya Van Ree to have her own lawyer present in order to make objections on Ms. Van Ree's behalf in connection with her deposition in this Action.

7. Admit that Susman Godfrey LLP represents you in this Action and also represented Ellen Barkin at her deposition in this Action of Friday, November 22, 2019.

ANSWER: Ms. Heard admits that she is represented by Davida Brook at Susman Godfrey LLP's Los Angeles office, and that Ms. Barkin is represented by her longtime attorney, Jacob Buchdahl, at Susman Godfrey LLP's New York office.

8. Admit that you called Mr. Depp a "pussy" while you were married to him.

ANSWER: Ms. Heard admits that, during arguments they had over the course of their relationship, she called Mr. Depp names and that "pussy" could have been one of the words that she used.

9. Admit that during the course of your marriage to Mr. Depp you used marijuana.

ANSWER: Ms. Heard admits that she may have used marijuana once or twice during the course of her marriage to Mr. Depp, but that is in sharp contrast to Mr. Depp, who used marijuana constantly.

10. Admit that during the course of your marriage to Mr. Depp you used illegal drugs.

ANSWER: Ms. Heard admits that she may have used illegal drugs once or twice during the course of her marriage to Mr. Depp, but that is in sharp contrast to Mr. Depp, who used illegal drugs constantly.

11. Admit that during the course of your marriage to Mr. Depp you abused alcohol.

ANSWER: Ms. Heard denies that during the course of her marriage to Mr. Depp she abused alcohol.

12. Admit that you sought treatment for prescription drug abuse during your relationship with Mr. Depp.

ANSWER: Ms. Heard denies that she sought treatment for prescription drug abuse during her relationship with Mr. Depp.

13. Admit that you sought treatment for illegal drug abuse during your relationship with Mr. Depp.

ANSWER: Ms. Heard denies that she sought treatment for illegal drug abuse during her relationship with Mr. Depp.

14. Admit that you sought treatment for alcohol abuse during your relationship with Mr. Depp.

ANSWER: Ms. Heard denies that she sought treatment for alcohol abuse during her relationship with Mr. Depp.

15. Admit that you have physically struck at least one other Romantic Partner of yours.

ANSWER: Ms. Heard denies that she has physically struck at least one other Romantic Partner of hers.

16. Admit that you have been arrested.

ANSWER: Ms. Heard admits that she was arrested 2009 in connection with an incident at the Seattle airport, but notes that the State declined to press charges.

17. Admit that you were arrested in 2009 for committing domestic violence against your then wife Tasya Van Ree.

ANSWER: Ms. Heard admits that she was arrested in 2009 in connection with an incident at the Seattle airport, but denies she was arrested for committing domestic violence and notes that the State declined to press charges.

18. Admit that you were incarcerated in 2009 for committing domestic violence against your then wife Tasya Van Ree.

ANSWER: Ms. Heard admits that she was arrested in 2009 in connection with an incident at the Seattle airport, but denies that she was arrested for committing domestic violence and notes that the State declined to press charges.

19. Admit that you publicly claimed you were actually arrested and incarcerated in 2009 for being “mouthy” with the arresting police officer.

ANSWER: Ms. Heard admits that she was arrested in connection with an incident at the Seattle airport in 2009, and that she stated on Twitter that she and Ms. Van Ree had a peaceful relationship, but that Ms. Heard “did have sh*t timing when I got mouthy with a cop.” Ms. Heard notes that the State declined to press charges.

20. Admit that during your marriage to Mr. Depp you punched Mr. Depp on at least one occasion.

ANSWER: Ms. Heard admits that, while Mr. Depp was threatening to assault her sister, she punched Mr. Depp on one occasion in order to protect her sister.

21. Admit that during your marriage to Mr. Depp you punched Mr. Depp on more than one occasion.

ANSWER: Ms. Heard denies that she punched Mr. Depp on more than one occasion.

22. Admit that during your marriage to Mr. Depp you kicked Mr. Depp on at least one occasion.

ANSWER: Ms. Heard admits that, as time went on during the course of their relationship, when Mr. Depp would violently assault her, Ms. Heard had to use her body and limbs to protect herself from acts of violence and abuse by Mr. Depp.

23. Admit that during your marriage to Mr. Depp you kicked Mr. Depp on more than one occasion.

ANSWER: Ms. Heard denies that she kicked Mr. Depp on more than one occasion.

24. Admit that during your marriage to Mr. Depp you hit Mr. Depp on at least one

occasion.

ANSWER: Ms. Heard admits that, as time went on during the course of their relationship, when Mr. Depp would violently assault her, Ms. Heard had to use her body and limbs to protect herself.

25. Admit that during your marriage to Mr. Depp you hit Mr. Depp on more than one occasion.

ANSWER: Ms. Heard admits that, as time went on during the course of their relationship, when Mr. Depp would violently assault her, Ms. Heard had to use her body and limbs to protect herself.

26. Admit that during your marriage to Mr. Depp, you once threw a can of paint thinner into the head of Mr. Depp on his island in the Bahamas.

ANSWER: Ms. Heard admits that on one occasion, when she was cornered by Mr. Depp and trying to escape an ongoing violent assault, she had to throw a can of paint thinner in Mr. Depp's direction.

27. Admit that during your marriage to Mr. Depp, you threw objects at Mr. Depp's body and head, including heavy bottles, soda cans, burning candles, television remotes, and paint thinner cans.

ANSWER: Ms. Heard admits that, as time went on during the course of their relationship, when Mr. Depp would violently assault her, she had to throw objects in Mr. Depp's direction in an effort to protect herself, but denies that those objects included burning candles.

28. Admit that during your marriage to Mr. Depp, you once kicked a door into Mr. Depp's head.

ANSWER: Ms. Heard denies that she once kicked a door into Mr. Depp's head, but admits that once when Mr. Depp was passed out on the bathroom floor, Ms. Heard forced the bathroom door open in order to prevent Mr. Depp from choking on his own vomit—something that Ms. Heard had to do on more than one occasion during the course of their marriage.

29. Admit that during your marriage to Mr. Depp, you threw a bottle at Mr. Depp that hit and severed part of his finger.

ANSWER: Ms. Heard denies that she threw a bottle at Mr. Depp that hit and severed part of his finger.

30. Admit that you confessed to a third party soon after throwing the bottle that severed part of Mr. Depp's finger that you "were so angry you just lost it" when you threw

the bottle at Mr. Depp.

ANSWER: Ms. Heard denies that she confessed to a third party soon after throwing the bottle that severed part of Mr. Depp's finger that she "were so angry you just lost it" when she threw the bottle at Mr. Depp.

31. Admit that Mr. Depp did not sever part of his own finger.

ANSWER: Defendant objects to this Request on the grounds that it violates Rule 4:11(e)(1), which prohibits Plaintiff from serving more than 30 requests for admission without leave of court.

32. Admit that you punched Mr. Depp's head and face repeatedly after he was late to your birthday party on April 21, 2016.

ANSWER: Defendant objects to this Request on the grounds that it violates Rule 4:11(e)(1), which prohibits Plaintiff from serving more than 30 requests for admission without leave of court.

33. Admit you punched Mr. Depp in the face on December 15, 2015.

ANSWER: Defendant objects to this Request on the grounds that it violates Rule 4:11(e)(1), which prohibits Plaintiff from serving more than 30 requests for admission without leave of court.

34. Admit that during your marriage to Mr. Depp, your friends Elizabeth Marz, Raquel Pennington, and Joshua Drew, and your sister Whitney Heard lived in apartments owned by Plaintiff and Plaintiff did not charge them rent.

ANSWER: Defendant objects to this Request on the grounds that it violates Rule 4:11(e)(1), which prohibits Plaintiff from serving more than 30 requests for admission without leave of court.

35. Admit that during your marriage to Mr. Depp, your friend iO Tillett Wright lived in a house owned by Plaintiff and Plaintiff did not charge him/her rent.

ANSWER: Defendant objects to this Request on the grounds that it violates Rule 4:11(e)(1), which prohibits Plaintiff from serving more than 30 requests for admission without leave of court.

36. Admit that you consulted with your divorce lawyer Samantha Spector before police arrived at Penthouse 1 of the Eastern Columbia Building on May 21, 2016.

ANSWER: Defendant objects to this Request on the grounds that it violates Rule 4:11(e)(1), which prohibits Plaintiff from serving more than 30 requests for admission without

leave of court.

37. Admit that you consulted with your publicist Jodi Gottlieb before police arrived at the Penthouse at the Eastern Columbia Building on May 21, 2016.

ANSWER: Defendant objects to this Request on the grounds that it violates Rule 4:11(e)(1), which prohibits Plaintiff from serving more than 30 requests for admission without leave of court.

38. Admit that you did not donate the entirety of your divorce settlement with Mr. Depp to charity.

ANSWER: Defendant objects to this Request on the grounds that it violates Rule 4:11(e)(1), which prohibits Plaintiff from serving more than 30 requests for admission without leave of court.

39. Admit that Raquel Pennington was hiding in Penthouse 3 of the Eastern Columbia Building when Mr. Depp arrived on May 21, 2016.

ANSWER: Defendant objects to this Request on the grounds that it violates Rule 4:11(e)(1), which prohibits Plaintiff from serving more than 30 requests for admission without leave of court.

40. Admit iO Tillett Wright slapped Raquel Pennington during your wedding weekend in the Bahamas.

ANSWER: Defendant objects to this Request on the grounds that it violates Rule 4:11(e)(1), which prohibits Plaintiff from serving more than 30 requests for admission without leave of court.

41. Admit that you asked Brandon Patterson and Trinity Esparza to communicate with a staff member of *People* magazine.

ANSWER: Defendant objects to this Request on the grounds that it violates Rule 4:11(e)(1), which prohibits Plaintiff from serving more than 30 requests for admission without leave of court.

42. Admit that you were in the presence of Isaac Baruch on one or more occasions between May 22 and May 25, 2016.

ANSWER: Defendant objects to this Request on the grounds that it violates Rule 4:11(e)(1), which prohibits Plaintiff from serving more than 30 requests for admission without leave of court.

43. Admit that you were in the presence of Laura Divenere on one or more occasions between May 22 and May 25, 2016.

ANSWER: Defendant objects to this Request on the grounds that it violates Rule 4:11(e)(1), which prohibits Plaintiff from serving more than 30 requests for admission without leave of court.

44. Admit you confessed to Kevin Murphy defecating on the bed in Penthouse 3 of the Eastern Columbia Building was a "harmless prank."

ANSWER: Defendant objects to this Request on the grounds that it violates Rule 4:11(e)(1), which prohibits Plaintiff from serving more than 30 requests for admission without leave of court.

45. Admit that you met with Cornelius Harrell in the Eastern Columbia Building on May 22, 2016.

ANSWER: Defendant objects to this Request on the grounds that it violates Rule 4:11(e)(1), which prohibits Plaintiff from serving more than 30 requests for admission without leave of court.

46. Admit that you attended Amanda de Cadenet's birthday party on May 22, 2016.

ANSWER: Defendant objects to this Request on the grounds that it violates Rule 4:11(e)(1), which prohibits Plaintiff from serving more than 30 requests for admission without leave of court.

47. Admit that you have been diagnosed with borderline personality disorder.

ANSWER: Defendant objects to this Request on the grounds that it violates Rule 4:11(e)(1), which prohibits Plaintiff from serving more than 30 requests for admission without leave of court.

48. Admit that you never saw a medical doctor or nurse regarding injuries you claimed to have suffered on May 21, 2016.

ANSWER: Defendant objects to this Request on the grounds that it violates Rule 4:11(e)(1), which prohibits Plaintiff from serving more than 30 requests for admission without leave of court.

49. Admit that you never saw a medical doctor or nurse regarding injuries you claimed to have suffered on December 15, 2015.

ANSWER: Defendant objects to this Request on the grounds that it violates Rule 4:11(e)(1), which prohibits Plaintiff from serving more than 30 requests for admission without leave of court.

50. Admit that Mr. Depp did not harmfully touch you the night before you taped the James Corden show on December 16, 2015.

ANSWER: Defendant objects to this Request on the grounds that it violates Rule 4:11(e)(1), which prohibits Plaintiff from serving more than 30 requests for admission without leave of court.

51. Admit you worked with Samantha McMillen on December 16, 2015 prior to the James Corden Show taping.

ANSWER: Defendant objects to this Request on the grounds that it violates Rule 4:11(e)(1), which prohibits Plaintiff from serving more than 30 requests for admission without leave of court.

52. Admit that you represented to the US Government in a letter that Samantha McMillen was merely your "friend" and not your assistant.

ANSWER: Defendant objects to this Request on the grounds that it violates Rule 4:11(e)(1), which prohibits Plaintiff from serving more than 30 requests for admission without leave of court.

53. Admit you violently attacked Mr. Depp in the Bahamas in 2014.

ANSWER: Defendant objects to this Request on the grounds that it violates Rule 4:11(e)(1), which prohibits Plaintiff from serving more than 30 requests for admission without leave of court.

54. Admit that in your wedding vows, you promised to be faithful to Johnny Depp.

ANSWER: Defendant objects to this Request on the grounds that it violates Rule 4:11(e)(1), which prohibits Plaintiff from serving more than 30 requests for admission without leave of court.

55. Admit that you had a sexual relationship with at least one other person while married to Mr. Depp.

ANSWER: Defendant objects to this Request on the grounds that it violates Rule 4:11(e)(1), which prohibits Plaintiff from serving more than 30 requests for admission without leave of court.

56. Admit that you had a sexual relationship with more than one other person while married to Mr. Depp.

ANSWER: Defendant objects to this Request on the grounds that it violates Rule 4:11(e)(1), which prohibits Plaintiff from serving more than 30 requests for admission without leave of court.

57. Admit that you had other Romantic Partners while married to Mr. Depp.

ANSWER: Defendant objects to this Request on the grounds that it violates Rule 4:11(e)(1), which prohibits Plaintiff from serving more than 30 requests for admission without leave of court.

58. Admit that you had sexual relations with Cara Delevingne while still married to Mr. Depp.

ANSWER: Defendant objects to this Request on the grounds that it violates Rule 4:11(e)(1), which prohibits Plaintiff from serving more than 30 requests for admission without leave of court.

59. Admit that Elon Musk came up to Mr. Depp's penthouse at the Eastern Columbia Building in March 2015.

ANSWER: Defendant objects to this Request on the grounds that it violates Rule 4:11(e)(1), which prohibits Plaintiff from serving more than 30 requests for admission without leave of court.

60. Admit that you had sexual relations with Elon Musk while still married to Mr. Depp.

ANSWER: Defendant objects to this Request on the grounds that it violates Rule 4:11(e)(1), which prohibits Plaintiff from serving more than 30 requests for admission without leave of court.

61. Admit that you never disclosed to Johnny Depp prior to your divorce from him that you had sexual relations with Elon Musk while still married to Johnny Depp.

ANSWER: Defendant objects to this Request on the grounds that it violates Rule 4:11(e)(1), which prohibits Plaintiff from serving more than 30 requests for admission without leave of court.

62. Admit that you never disclosed to Mr. Depp prior to your divorce from him that you had sex with Cara Delevingne while still married to Mr. Depp.

ANSWER: Defendant objects to this Request on the grounds that it violates Rule 4:11(e)(1), which prohibits Plaintiff from serving more than 30 requests for admission without leave of court.

63. Admit that James Franco came to Mr. Depp's penthouse at the Eastern Columbia Building on or after May 21, 2016.

ANSWER: Defendant objects to this Request on the grounds that it violates Rule 4:11(e)(1), which prohibits Plaintiff from serving more than 30 requests for admission without leave of court.

64. Admit that James Franco came to Mr. Depp's penthouse at the Eastern

Columbia Building before May 21, 2016.

ANSWER: Defendant objects to this Request on the grounds that it violates Rule 4:11(e)(1), which prohibits Plaintiff from serving more than 30 requests for admission without leave of court.

65. Admit that you had sexual relations with James Franco while still married to Mr. Depp.

ANSWER: Defendant objects to this Request on the grounds that it violates Rule 4:11(e)(1), which prohibits Plaintiff from serving more than 30 requests for admission without leave of court.

66. Admit that you never disclosed to Mr. Depp prior to your divorce from him that you had sex with James Franco while still married to Mr. Depp.

ANSWER: Defendant objects to this Request on the grounds that it violates Rule 4:11(e)(1), which prohibits Plaintiff from serving more than 30 requests for admission without leave of court.

67. Admit that you traveled to or through either Dulles International Airport or Ronald Reagan Washington National Airport prior to April 10, 2019.

ANSWER: Defendant objects to this Request on the grounds that it violates Rule 4:11(e)(1), which prohibits Plaintiff from serving more than 30 requests for admission without leave of court.

68. Admit that Mr. Depp has never physically harmed you.

ANSWER: Defendant objects to this Request on the grounds that it violates Rule 4:11(e)(1), which prohibits Plaintiff from serving more than 30 requests for admission without leave of court.

69. Admit that Mr. Depp has never intended to physically harm you.

ANSWER: Defendant objects to this Request on the grounds that it violates Rule 4:11(e)(1), which prohibits Plaintiff from serving more than 30 requests for admission without leave of court.

70. Admit that no third person has witnessed Mr. Depp in the act of physically harming you.

ANSWER: Defendant objects to this Request on the grounds that it violates Rule 4:11(e)(1), which prohibits Plaintiff from serving more than 30 requests for admission without leave of court.

71. Admit that you are unaware of any third person witnessing Mr. Depp in the

act of physically harming you.

ANSWER: Defendant objects to this Request on the grounds that it violates Rule 4:11(e)(1), which prohibits Plaintiff from serving more than 30 requests for admission without leave of court.

72. Admit that no photographs show Mr. Depp in the act of physically harming you.

ANSWER: Defendant objects to this Request on the grounds that it violates Rule 4:11(e)(1), which prohibits Plaintiff from serving more than 30 requests for admission without leave of court.

73. Admit that you are unaware of any photographs that show Mr. Depp in the act of physically harming you.

ANSWER: Defendant objects to this Request on the grounds that it violates Rule 4:11(e)(1), which prohibits Plaintiff from serving more than 30 requests for admission without leave of court.

74. Admit that no video recordings show Mr. Depp in the act of physically harming you.

ANSWER: Defendant objects to this Request on the grounds that it violates Rule 4:11(e)(1), which prohibits Plaintiff from serving more than 30 requests for admission without leave of court.

75. Admit that you are unaware of any video recordings showing Mr. Depp in the act of physically harming you.

ANSWER: Defendant objects to this Request on the grounds that it violates Rule 4:11(e)(1), which prohibits Plaintiff from serving more than 30 requests for admission without leave of court.

76. Admit that no audio recordings exist of any incident of Mr. Depp in the act of physically harming you.

ANSWER: Defendant objects to this Request on the grounds that it violates Rule 4:11(e)(1), which prohibits Plaintiff from serving more than 30 requests for admission without leave of court.

77. Admit that you are unaware of any audio recordings of Mr. Depp in the act of physically harming you.

ANSWER: Defendant objects to this Request on the grounds that it violates Rule 4:11(e)(1), which prohibits Plaintiff from serving more than 30 requests for admission without leave of court.

78. Admit that Mr. Depp has never told you that he physically harmed you.

ANSWER: Defendant objects to this Request on the grounds that it violates Rule 4:11(e)(1), which prohibits Plaintiff from serving more than 30 requests for admission without leave of court.

79. Admit that Mr. Depp has never told any third person that he physically harmed you.

ANSWER: Defendant objects to this Request on the grounds that it violates Rule 4:11(e)(1), which prohibits Plaintiff from serving more than 30 requests for admission without leave of court.

80. Admit that you are unaware of any instance where Mr. Depp told any third person that he physically harmed you.

ANSWER: Defendant objects to this Request on the grounds that it violates Rule 4:11(e)(1), which prohibits Plaintiff from serving more than 30 requests for admission without leave of court.

81. Admit that Mr. Depp has never admitted in writing that he has physically harmed you.

ANSWER: Defendant objects to this Request on the grounds that it violates Rule 4:11(e)(1), which prohibits Plaintiff from serving more than 30 requests for admission without leave of court.

82. Admit that you are unaware of any instance where Mr. Depp admitted in writing that he physically harmed you.

ANSWER: Defendant objects to this Request on the grounds that it violates Rule 4:11(e)(1), which prohibits Plaintiff from serving more than 30 requests for admission without leave of court.

83. Admit that Mr. Depp has never sexually assaulted you.

ANSWER: Defendant objects to this Request on the grounds that it violates Rule 4:11(e)(1), which prohibits Plaintiff from serving more than 30 requests for admission without leave of court.

84. Admit that you have never asserted that Mr. Depp has sexually assaulted you.

ANSWER: Defendant objects to this Request on the grounds that it violates Rule 4:11(e)(1), which prohibits Plaintiff from serving more than 30 requests for admission without leave of court.

85. Admit that no third person has witnessed Mr. Depp in the act of sexually assaulting you.

ANSWER: Defendant objects to this Request on the grounds that it violates Rule 4:11(e)(1), which prohibits Plaintiff from serving more than 30 requests for admission without leave of court.

86. Admit that you are unaware of any third person witnessing Mr. Depp in the act of sexually assaulting you.

ANSWER: Defendant objects to this Request on the grounds that it violates Rule 4:11(e)(1), which prohibits Plaintiff from serving more than 30 requests for admission without leave of court

87. Admit that no photographs show Mr. Depp in the act of sexually assaulting you.

ANSWER: Defendant objects to this Request on the grounds that it violates Rule 4:11(e)(1), which prohibits Plaintiff from serving more than 30 requests for admission without leave of court.

88. Admit that you are unaware of any photographs that show Mr. Depp in the act of sexually assaulting you.

ANSWER: Defendant objects to this Request on the grounds that it violates Rule 4:11(e)(1), which prohibits Plaintiff from serving more than 30 requests for admission without leave of court.

89. Admit that no video recordings show Mr. Depp in the act of sexually assaulting you.

ANSWER: Defendant objects to this Request on the grounds that it violates Rule 4:11(e)(1), which prohibits Plaintiff from serving more than 30 requests for admission without leave of court.

90. Admit that you are unaware of any video recordings showing Mr. Depp in the act of sexually assaulting you.

ANSWER: Defendant objects to this Request on the grounds that it violates Rule 4:11(e)(1), which prohibits Plaintiff from serving more than 30 requests for admission without leave of court.

91. Admit that no audio recordings exist of any incident of Mr. Depp in the act of sexually assaulting you.

ANSWER: Defendant objects to this Request on the grounds that it violates Rule 4:11(e)(1), which prohibits Plaintiff from serving more than 30 requests for admission without leave of court.

92. Admit that you are unaware of any audio recordings of Mr. Depp in the act of sexually assaulting you.

ANSWER: Defendant objects to this Request on the grounds that it violates Rule 4:11(e)(1), which prohibits Plaintiff from serving more than 30 requests for admission without leave of court.

93. Admit that Mr. Depp has never told you that he sexually assaulted you.

ANSWER: Defendant objects to this Request on the grounds that it violates Rule 4:11(e)(1), which prohibits Plaintiff from serving more than 30 requests for admission without leave of court.

94. Admit that Mr. Depp has never told any third person that he sexually assaulted you.

ANSWER: Defendant objects to this Request on the grounds that it violates Rule 4:11(e)(1), which prohibits Plaintiff from serving more than 30 requests for admission without leave of court.

95. Admit that you are unaware of any instance where Mr. Depp told any third person that he sexually assaulted you.

ANSWER: Defendant objects to this Request on the grounds that it violates Rule 4:11(e)(1), which prohibits Plaintiff from serving more than 30 requests for admission without leave of court.

96. Admit that Mr. Depp has never admitted in writing that he has sexually assaulted you.

ANSWER: Defendant objects to this Request on the grounds that it violates Rule 4:11(e)(1), which prohibits Plaintiff from serving more than 30 requests for admission without leave of court.

97. Admit that you are unaware of any instance where Mr. Depp admitted in writing that he sexually assaulted you.

ANSWER: Defendant objects to this Request on the grounds that it violates Rule 4:11(e)(1), which prohibits Plaintiff from serving more than 30 requests for admission without leave of court.

98. Admit that Mr. Depp has never physically harmed a third person who was a Romantic Partner of his.

ANSWER: Defendant objects to this Request on the grounds that it violates Rule 4:11(e)(1), which prohibits Plaintiff from serving more than 30 requests for admission without leave of court.

99. Admit that you are unaware of a third person Romantic Partner of Mr. Depp's who he has physically harmed.

ANSWER: Defendant objects to this Request on the grounds that it violates Rule 4:11(e)(1), which prohibits Plaintiff from serving more than 30 requests for admission without leave of court.

100. Admit that no third person who was a Romantic Partner of Mr. Depp has claimed that Mr. Depp physically harmed her.

ANSWER: Defendant objects to this Request on the grounds that it violates Rule 4:11(e)(1), which prohibits Plaintiff from serving more than 30 requests for admission without leave of court.

101. Admit that you are unaware of any third person who was a Romantic Partner of Mr. Depp claiming that Mr. Depp physically assaulted her.

ANSWER: Defendant objects to this Request on the grounds that it violates Rule 4:11(e)(1), which prohibits Plaintiff from serving more than 30 requests for admission without leave of court.

102. Admit that no third person has witnessed Mr. Depp physically harming a third person who was a Romantic Partner of his.

ANSWER: Defendant objects to this Request on the grounds that it violates Rule 4:11(e)(1), which prohibits Plaintiff from serving more than 30 requests for admission without leave of court.

103. Admit that you are unaware of any third person witnessing Mr. Depp in the act of physically harming a third person who was a Romantic Partner of his.

ANSWER: Defendant objects to this Request on the grounds that it violates Rule 4:11(e)(1), which prohibits Plaintiff from serving more than 30 requests for admission without leave of court.

104. Admit that no photographs show Mr. Depp in the act of physically harming a third person who was a Romantic Partner of his.

ANSWER: Defendant objects to this Request on the grounds that it violates Rule 4:11(e)(1), which prohibits Plaintiff from serving more than 30 requests for admission without leave of court.

105. Admit that you are unaware of any photographs that show Mr. Depp in the act of physically harming a third person who was a Romantic Partner of his.

ANSWER: Defendant objects to this Request on the grounds that it violates Rule 4:11(e)(1), which prohibits Plaintiff from serving more than 30 requests for admission without leave of court.

106. Admit that no video recordings show Mr. Depp physically harming a third person who was a Romantic Partner of his.

ANSWER: Defendant objects to this Request on the grounds that it violates Rule 4:11(e)(1), which prohibits Plaintiff from serving more than 30 requests for admission without leave of court.

107. Admit that you are unaware of any video recordings showing Mr. Depp physically harming a third person who was a Romantic Partner of his.

ANSWER: Defendant objects to this Request on the grounds that it violates Rule 4:11(e)(1), which prohibits Plaintiff from serving more than 30 requests for admission without leave of court.

108. Admit that no audio recordings exist of any incident of Mr. Depp physically harming a third person who was a Romantic Partner of his.

ANSWER: Defendant objects to this Request on the grounds that it violates Rule 4:11(e)(1), which prohibits Plaintiff from serving more than 30 requests for admission without leave of court.

109. Admit that you are unaware of any audio recordings of Mr. Depp physically harming a third person who was a Romantic Partner of his.

ANSWER: Defendant objects to this Request on the grounds that it violates Rule 4:11(e)(1), which prohibits Plaintiff from serving more than 30 requests for admission without leave of court.

110. Admit that Mr. Depp has never told you that he physically harmed a third person who was a Romantic Partner of his.

ANSWER: Defendant objects to this Request on the grounds that it violates Rule 4:11(e)(1), which prohibits Plaintiff from serving more than 30 requests for admission without leave of court.

111. Admit that Mr. Depp has never told any third person that he physically harmed a third person who was a Romantic Partner of his.

ANSWER: Defendant objects to this Request on the grounds that it violates Rule 4:11(e)(1), which prohibits Plaintiff from serving more than 30 requests for admission without leave of court.

112. Admit that you are unaware of any instance where Mr. Depp told any third person that he physically harmed a third person who was a Romantic Partner of his.

ANSWER: Defendant objects to this Request on the grounds that it violates Rule 4:11(e)(1), which prohibits Plaintiff from serving more than 30 requests for admission without leave of court.

113. Admit that Mr. Depp has never admitted in writing that he has physically harmed a third person who was a Romantic Partner of his.

ANSWER: Defendant objects to this Request on the grounds that it violates Rule 4:11(e)(1), which prohibits Plaintiff from serving more than 30 requests for admission without leave of court.

114. Admit that you are unaware of any instance where Mr. Depp admitted in writing that he physically harmed a third person who was a Romantic Partner of his.

ANSWER: Defendant objects to this Request on the grounds that it violates Rule 4:11(e)(1), which prohibits Plaintiff from serving more than 30 requests for admission without leave of court.

115. Admit that no third person who was a Romantic Partner of Mr. Depp has claimed that Mr. Depp physically harmed her.

ANSWER: Defendant objects to this Request on the grounds that it violates Rule 4:11(e)(1), which prohibits Plaintiff from serving more than 30 requests for admission without leave of court.

116. Admit that you are unaware of any third person who was a Romantic Partner of Mr. Depp claiming that Mr. Depp physically harmed her.

ANSWER: Defendant objects to this Request on the grounds that it violates Rule 4:11(e)(1), which prohibits Plaintiff from serving more than 30 requests for admission without leave of court.

117. Admit that Mr. Depp has never sexually assaulted a third person who was a Romantic Partner of his.

ANSWER: Defendant objects to this Request on the grounds that it violates Rule 4:11(e)(1), which prohibits Plaintiff from serving more than 30 requests for admission without leave of court.

118. Admit that no third person has witnessed Mr. Depp sexually assaulting a third person who was a Romantic Partner of his.

ANSWER: Defendant objects to this Request on the grounds that it violates Rule 4:11(e)(1), which prohibits Plaintiff from serving more than 30 requests for admission without leave of court.

119. Admit that you are unaware of any third person witnessing Mr. Depp sexually assaulting a third person who was a Romantic Partner of his.

ANSWER: Defendant objects to this Request on the grounds that it violates Rule 4:11(e)(1), which prohibits Plaintiff from serving more than 30 requests for admission without leave of court.

120. Admit that no photographs show Mr. Depp sexually assaulting a third person who was a Romantic Partner of his.

ANSWER: Defendant objects to this Request on the grounds that it violates Rule 4:11(e)(1), which prohibits Plaintiff from serving more than 30 requests for admission without leave of court.

121. Admit that you are unaware of any photographs that show Mr. Depp sexually assaulting a third person who was a Romantic Partner of his.

ANSWER: Defendant objects to this Request on the grounds that it violates Rule 4:11(e)(1), which prohibits Plaintiff from serving more than 30 requests for admission without leave of court.

122. Admit that no video recordings show Mr. Depp sexually assaulting a third person who was a Romantic Partner of his.

ANSWER: Defendant objects to this Request on the grounds that it violates Rule 4:11(e)(1), which prohibits Plaintiff from serving more than 30 requests for admission without leave of court.

123. Admit that you are unaware of any video recordings showing Mr. Depp sexually assaulting a third person who was a Romantic Partner of his.

ANSWER: Defendant objects to this Request on the grounds that it violates Rule 4:11(e)(1), which prohibits Plaintiff from serving more than 30 requests for admission without leave of court.

124. Admit that no audio recordings exist of any incident of Mr. Depp sexually assaulting a third person who was a Romantic Partner of his.

ANSWER: Defendant objects to this Request on the grounds that it violates Rule 4:11(e)(1), which prohibits Plaintiff from serving more than 30 requests for admission without leave of court.

125. Admit that you are unaware of any audio recordings of Mr. Depp sexually assaulting a third person who was a Romantic Partner of his.

ANSWER: Defendant objects to this Request on the grounds that it violates Rule

4:11(e)(1), which prohibits Plaintiff from serving more than 30 requests for admission without leave of court.

126. Admit that Mr. Depp has never told you that he sexually assaulted a third person who was a Romantic Partner of his.

ANSWER: Defendant objects to this Request on the grounds that it violates Rule 4:11(e)(1), which prohibits Plaintiff from serving more than 30 requests for admission without leave of court.

127. Admit that Mr. Depp has never told any third person that he sexually assaulted a third person who was a Romantic Partner of his.

ANSWER: Defendant objects to this Request on the grounds that it violates Rule 4:11(e)(1), which prohibits Plaintiff from serving more than 30 requests for admission without leave of court.

128. Admit that you are unaware of any instance where Mr. Depp told any third person that he sexually assaulted a third person who was a Romantic Partner of his.

ANSWER: Defendant objects to this Request on the grounds that it violates Rule 4:11(e)(1), which prohibits Plaintiff from serving more than 30 requests for admission without leave of court.

129. Admit that Mr. Depp has never admitted in writing that he has sexually assaulted a third person who was a Romantic Partner of his.

ANSWER: Defendant objects to this Request on the grounds that it violates Rule 4:11(e)(1), which prohibits Plaintiff from serving more than 30 requests for admission without leave of court.

130. Admit that you are unaware of any instance where Mr. Depp admitted in writing that he sexually assaulted a third person who was a Romantic Partner of his.

ANSWER: Defendant objects to this Request on the grounds that it violates Rule 4:11(e)(1), which prohibits Plaintiff from serving more than 30 requests for admission without leave of court.

131. Admit that no third person who was a Romantic Partner of Mr. Depp has claimed that Mr. Depp sexually assaulted her.

ANSWER: Defendant objects to this Request on the grounds that it violates Rule 4:11(e)(1), which prohibits Plaintiff from serving more than 30 requests for admission without leave of court.

132. Admit that you are unaware of any third person who was a Romantic Partner of Mr. Depp claiming that Mr. Depp sexually assaulted her.

ANSWER: Defendant objects to this Request on the grounds that it violates Rule 4:11(e)(1), which prohibits Plaintiff from serving more than 30 requests for admission without leave of court.

133. Admit that you have never sought medical treatment for any injuries that you claim were caused by Mr. Depp.

ANSWER: Defendant objects to this Request on the grounds that it violates Rule 4:11(e)(1), which prohibits Plaintiff from serving more than 30 requests for admission without leave of court.

134. Admit that you have never received medical treatment for any injuries that you claim were caused by Mr. Depp.

ANSWER: Defendant objects to this Request on the grounds that it violates Rule 4:11(e)(1), which prohibits Plaintiff from serving more than 30 requests for admission without leave of court.

135. Admit that you have never sought medical treatment relating to any sexual assault you claim was committed by Mr. Depp.

ANSWER: Defendant objects to this Request on the grounds that it violates Rule 4:11(e)(1), which prohibits Plaintiff from serving more than 30 requests for admission without leave of court.

136. Admit that you have never received medical treatment relating to any sexual assault you claim was committed by Mr. Depp.

ANSWER: Defendant objects to this Request on the grounds that it violates Rule 4:11(e)(1), which prohibits Plaintiff from serving more than 30 requests for admission without leave of court.

137. Admit that you have never sought psychological treatment for any physical injuries you claim were caused by Mr. Depp.

ANSWER: Defendant objects to this Request on the grounds that it violates Rule 4:11(e)(1), which prohibits Plaintiff from serving more than 30 requests for admission without leave of court.

138. Admit that you have never received psychological treatment for any physical injuries you claim were caused by Mr. Depp.

ANSWER: Defendant objects to this Request on the grounds that it violates Rule 4:11(e)(1), which prohibits Plaintiff from serving more than 30 requests for admission without leave of court.

139. Admit that after you and Mr. Depp divorced, you withdrew your allegations that Mr. Depp abused you.

ANSWER: Defendant objects to this Request on the grounds that it violates Rule 4:11(e)(1), which prohibits Plaintiff from serving more than 30 requests for admission without leave of court.

140. Admit that after you and Mr. Depp divorced, you issued a statement that your and Mr. Depp's relationship was intensely passionate and at times volatile, but always bound by love.

ANSWER: Defendant objects to this Request on the grounds that it violates Rule 4:11(e)(1), which prohibits Plaintiff from serving more than 30 requests for admission without leave of court.

141. Admit that after you and Mr. Depp divorced, you issued a statement that in your and Mr. Depp's relationship there was never any intent of physical or emotional harm.

ANSWER: Defendant objects to this Request on the grounds that it violates Rule 4:11(e)(1), which prohibits Plaintiff from serving more than 30 requests for admission without leave of court.

142. Admit that you drafted the Op-ed.

ANSWER: Defendant objects to this Request on the grounds that it violates Rule 4:11(e)(1), which prohibits Plaintiff from serving more than 30 requests for admission without leave of court.

143. Admit that you approved the final version of the Op-ed prior to publication.

ANSWER: Defendant objects to this Request on the grounds that it violates Rule 4:11(e)(1), which prohibits Plaintiff from serving more than 30 requests for admission without leave of court.

144. Admit that you approved the title of the Op-ed prior to publication.

ANSWER: Defendant objects to this Request on the grounds that it violates Rule 4:11(e)(1), which prohibits Plaintiff from serving more than 30 requests for admission without leave of court.

145. Admit that in the Op-Ed, you claimed you became a public figure representing domestic abuse.

ANSWER: Defendant objects to this Request on the grounds that it violates Rule

4:11(e)(1), which prohibits Plaintiff from serving more than 30 requests for admission without leave of court.

146. Admit that the domestic abuse you referred to in the Op-Ed was your claim that Mr. Depp abused you.

ANSWER: Defendant objects to this Request on the grounds that it violates Rule 4:11(e)(1), which prohibits Plaintiff from serving more than 30 requests for admission without leave of court.

147. Admit that readers of the Op-Ed understood that your Op-Ed was referring to Mr. Depp.

ANSWER: Defendant objects to this Request on the grounds that it violates Rule 4:11(e)(1), which prohibits Plaintiff from serving more than 30 requests for admission without leave of court.

148. Admit that readers of the Op-Ed understood that your Op-Ed was referring to your claim that Mr. Depp abused you.

ANSWER: Defendant objects to this Request on the grounds that it violates Rule 4:11(e)(1), which prohibits Plaintiff from serving more than 30 requests for admission without leave of court.

149. Admit that other media sources reported that the Op-Ed was understood to be referring to your claim that Mr. Depp abused you.

ANSWER: Defendant objects to this Request on the grounds that it violates Rule 4:11(e)(1), which prohibits Plaintiff from serving more than 30 requests for admission without leave of court.

150. Admit that you have publicly claimed that Mr. Depp committed domestic abuse against you.

ANSWER: Defendant objects to this Request on the grounds that it violates Rule 4:11(e)(1), which prohibits Plaintiff from serving more than 30 requests for admission without leave of court.

151. Admit that after the Op-Ed was published, Disney announced that Mr. Depp no longer would play the role of Captain Jack Sparrow in future *Pirates of the Caribbean* films.

ANSWER: Defendant objects to this Request on the grounds that it violates Rule 4:11(e)(1), which prohibits Plaintiff from serving more than 30 requests for admission without leave of court.

152. Admit that the Op-Ed was a substantial cause of Disney firing Mr. Depp from future

Pirates of the Caribbean films.

ANSWER: Defendant objects to this Request on the grounds that it violates Rule 4:11(e)(1), which prohibits Plaintiff from serving more than 30 requests for admission without leave of court.

153. Admit that Mr. Depp's income from films has declined since the publication of the Op- Ed.

ANSWER: Defendant objects to this Request on the grounds that it violates Rule 4:11(e)(1), which prohibits Plaintiff from serving more than 30 requests for admission without leave of court.

154. Admit that the public service announcement you made with Girlgaze in November 2016 about "this" was about abuse you claim to have suffered.

ANSWER: Defendant objects to this Request on the grounds that it violates Rule 4:11(e)(1), which prohibits Plaintiff from serving more than 30 requests for admission without leave of court.

155. Admit that when you said "when it happens behind closed doors, with someone you love" in the Girlgaze PSA, you were referring to Mr. Depp.

ANSWER: Defendant objects to this Request on the grounds that it violates Rule 4:11(e)(1), which prohibits Plaintiff from serving more than 30 requests for admission without leave of court.

156. Admit that other individuals besides you are funding your legal expenses in this lawsuit.

ANSWER: Defendant objects to this Request on the grounds that it violates Rule 4:11(e)(1), which prohibits Plaintiff from serving more than 30 requests for admission without leave of court.

157. Admit that other organizations are funding your legal expenses in this lawsuit.

ANSWER: Defendant objects to this Request on the grounds that it violates Rule 4:11(e)(1), which prohibits Plaintiff from serving more than 30 requests for admission without leave of court.

December 30, 2019

Respectfully submitted,
Amber L. Heard


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CERTIFICATE OF SERVICE

I certify that on this 30th day of December 2019, a copy of the foregoing was served by email and first class mail, postage prepaid upon:

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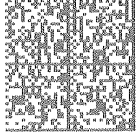
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[PLACEHOLDER] Exhibit JR3

Clip from Amber Heard's interview by Dutch
broadcaster RTL