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Notes:

- **dates** are written in a **day / month / year** format, eg. 10. 3. 2019 or 10. 03. 2019 = 10th March 2019 = 10/3/2019 for the Americans
- **hours** are written in a **24h system** format, eg. 3:15 = 3:15am, 12h = 12pm, 12:30 = 12:30pm, 13:42 = 1:42pm, 14h = 2pm, 20:03 = 8:03pm, 24h = 12am, 00:20 = 12:20am etc.
- **public documents from the UK trial in pdf formats** are available on [Nick Wallis](https://nickwallis.com/depp-trial) (nickwallis.com/depp-trial)

- a lot of legal documents from the UK trial, excerpts pertaining to particular incidents and other documents are available on [IFOD Love and support for artist and humanitarian Johnny Depp](http://ifod.net/thetruth/) (ifod.net/thetruth/)
 - public documents from the VA trial in pdf formats are available on fairfaxcounty.gov/circuit/high-profile-cases where you need to type into the search box for the latest updates
 - public documents from the NY trial in pdf formats are available on deppdive
 - dockets with lists of public documents for CA trials are available on California Courts and California Court Records but to view the documents, a payed registration is required
 - documents for the CA part of the VA trial, beside links to docs from other JD related trials, appear on twitter account of [TheRealLauraB](https://twitter.com/LauraBockov) (@LauraBockov) and on deppdive
 - lots of public documents from different trials are available on deppdive (deppdive.net), plus a [table with photos](#)
 - incredibly useful timeline is painstakingly being put together as [The Johnny Depp Chronology](#) by Anna
-
- I've red-marked stuff I found interesting in terms of timing or location mostly, and pink/violet-marked my thoughts, questions, theories...
 - for the sake of clearance, AH's sister Whitney is always Ms. Henriquez
-
- ACLU = American Civil Liberties Union
 - AH = Amber Heard
 - AUS = Australia
 - b/w = black/white
 - CA = California
 - CAN = Canada
 - CHLA = Children's Hospital of Los Angeles
 - CO = Columbia
 - CV = curriculum vitae
 - DPM = Deal Point Memorandum or the divorce settlement agreement (15./16. 8. 2016)
 - F894.232A = A indicates photo with metadata for a photo named F894.232
 - GMT = Greenwich Mean Time
 - HIPAA = Health Insurance Portability and Accountability Act (1996)
 - IDC = informal discovery conference
 - IME = independent medical examination
 - JD = Johnny Depp
 - LAPD = Los Angeles Police Department
 - NGN = News Group Newspapers
 - NY = New York
 - NYPD = New York Police Department
 - PH = penthouse (PH3 = penthouse 3)
 - PT or PST = Pacific Standard Time
 - RFA = request for admission

- RFP = request for production of documents
 - ROG = interrogatory
 - TMG = The Mandel Company, aka The Management Group
 - TRO = temporary restraining order
 - TX = Texas
 - UK = United Kingdom
 - US = United States of America
 - VA = Virginia
 - WA = Washington State
 - WB = Warner Brothers, Warner Bros.
 - WBEI = Warner Bros. Entertainment Inc.
 - YT = YouTube
-
- this compilation was made because I was getting quite frustrated by always having to google and/or search for the relevant material when it was referenced
 - am not taking responsibility for broken links or material being deleted, sorry

Divorce Action

21. 5. 2016 – 13. 1. 2017

case no. BD 641052

- **01. or 03. or 07. 02. 2015 – wedding**
- **21. 05. 2016 – separation**
- **21. 05. 2016 – NYPD incident recall, ?20:16 – 20:23** (NYPD), this is from NGN's closing submissions from 27. 7. 2020, p. 127 of pdf ([NGN-cl](#))
 - Mr. Wright calls NYPD, 7min [[or does he?](#)]
 - [[the timing is weird because according to Mr. Wright's phone record, which he posted himself on twitter then deleted, and NGN's closing submissions, Mr. Wright called AH at 20:11 \(0:23\) and 20:11:54 – 20:15:22 \(3:28\), then he called Ms. Pennington at 20:15 \(~1:00\), texted her at 20:16 \(four lines of text, if the call was about one minute, we are here firmly in 20:17 already\) and called her again at 20:24, then he called a number from San Francisco \(Lauren?\), then he received a call from a blocked number at 20:28, then he called a number from NY at 20:31. and then he called 911 on 22. 5. 2016 at 00:16 \(7:00\). these are all CA times. there is a 3h difference between NY and CA. the 911 call in the phone record is at 3:16 am. how on earth did NGN's defense put that call at 20:16 of 21. 5. 2016 and no one commented on it? this is a six hour time difference! all other calculations are made for the 3h time difference. according to his own phone record, Mr. Wright did not call 911 at 20:16 CA time. who called?](#)]
- **21. 05. 2016 – LAPD incident recall LPD160521004756, 20:30–21:22** ([LAPD1](#)) is also on p. 10 of pdf in AH's reply in support of motion to dismiss / transfer from 31. 5. 2019 ([AH-ReplSuppMotDismiss](#)) ✓
 - [call logged at 20:30](#), duplicate call from a woman from NYPD came through at [20:37](#), LAPD dispatched at 20:46, [LAPD arrived at PHs at 20:57](#), [incident closed at 21:22](#) [[the call took place at 20:27:27 – 20:29:40](#)]
 - 21:22 record: "Met w/ vict. Chckd loc. Verified husband left loc. Vict advised verbal dispute and refused to give any frthr info. Issue bus card."
 - according to Mr Wright's Mr Wright's [tweet](#) from 25. 2. 2020 and his UK testimony (par. 67, [iO 19-12-12 w](#)), the caller was Laura or Lauren [[Shapiro, Mr. Wright's friend whom he claims he called to ask her to call LAPD. Ms. Shapiro works for James Corden. her calling is contested by her own IG, plus a tweet and a tweet by her friends, with photos taken at the Cinespia 2016 party movie night at Hollywood Forever Cemetery where the screening of The Silence of the Lambs started at 20:30. even if she was in the bathroom facilities at the site, it would not have been dead silent. it is also interesting that the caller says that the one who was being assaulted called her to call the police, and that could not be Mr. Wright.](#)]

- [for an excellent break-down of the 911 call and the circumstances surrounding it see [Incredibly Average](#) in *Amber Heard & Friends: Constant Contradictions!* (1. 5. 2020)]
- [it's a bit odd that the time spent in PH3 for JD and his security team seemed very short (10–15 min, at most 40 min) and they maintain so in their witness statements and court hearings, but in reality, when compared to the cctv footage and 911 call, it seems that it was indeed around 1h30. they went up the elevator at 18:56 (19:02:37) and down the elevator at 20:22 – 20:23 (20:28 – 20:29:06), according to the cctv. this is weird. the 911 call took place at 20:27:27 – 20:29:40, *after they already left the Eastern*. we can assume that LAPD time stamps are correct, because they can't afford to not have such things accurate, right? commentary in NGN's closing submissions, p. 13 of pdf, states that the discrepancy between the elevator camera (camera 2) and garage and lobby cameras is about 6 min. this is clearly evident from cctv footage of, for example, AH and company going down the elevator to talk to the concierge on 22. 5. 2016; they are going down the elevator at 13:06 *then* AH is talking to the concierge at 13:00. so JD and his security arrived at about 18:56 and left at about 20:22. this supports JD's UK attorneys' theory that the cctv timing is not real timing. *but*, this discrepancy should apply to both cctv elevator footages, as it is the same camera, so the *whole* timing of them being in PHs is still 1h30. unfortunately the timings on the cctv stills from the lobby and parking garage footage is illegible. this also leaves JD with practically no time for smashing things around penthouses or hallways.]
- **21. 05. 2016 – LAPD audio disks**, 20:33, are exhibits 503, 504, and 505 in JD's exhibit list from 8. 8. 2016
 - according to NGN's closing submissions from 27. 7. 2020, p. 18 of pdf ([NGN-cl](#)), the audio call between NYPD and LAPD is on audio disk 2 - track 2, it took place at 20:33
- **21. 05. 2016 – LAPD business card 1**, 21:16 ([LAPD1.1bc](#), [back site](#)) issued to AH
- **21. 05. 2016 – LAPD business card 2**, (LAPD1.2bc) issued to Mr. Drew
- **21./22. 05. 2016 – LAPD incident recall LPD160521005437**, 22:09–3:01 ([LAPD2](#)) is also exhibit 4 in Joshua Drew's UK witness statement from 12. 2. 2020, p. E334 ([JoDr 20-02-12 w](#)) and on p. 9 of pdf in AH's reply in support of motion to dismiss / transfer from 31. 5. 2019 ([AH-ReplSuppMotDismiss](#)) ✓
 - teletype from NYPD arrived at 22:09 (female caller), unit dispatched at 22:17, **LAPD arrived at PHs at 22:24**, sth happened at 23:00, **incident closed at 3:01** [why was it closed so late?, LAPD bodycams don't have time stamps?]
 - [the footage of [bodycam 1](#) and [bodycam 2](#), plus stills ([1](#), [2](#), [3](#)) taken from them, were published in *Johnny Depp says new police testimony and never-before-seen bodycam footage showing a tidy apartment proves Amber Heard is lying about blowout fight where she claimed the actor trashed their penthouse and threw a phone at her face* by Ben Ashford for [Daily Mail](#) from 16. 4. 2021, 16:12 GMT; only the footage is in the video by [Come Geek Some](#) from 17. 4. 2021 (11:17, 1:02–4:00 and 6:19–8:42).]

- **22. 05. 2016 – Joshua Drew's statement** (JoDr 16-05-21 st) was sent to AH in an email on 22. 5. 2016 at 21:43 and is on p. E404 of exhibit 16 which is part of exhibit JD1 of his UK witness statement from 12. 2. 2020, p. E171 – E295 ([JoDr 20-02-12 s](#)), it is also referred to and a few sentences are quoted on p. 239 – 244 (p. E232 – E233) in Joshua Drew's confidential video deposition from 19. 11. 2019 which is also part of exhibit JD1 of his UK witness statement from 12. 2. 2020, p. E171 – E295 ([JoDr 20-02-12 w](#)) ✓
 - At 8:06 PM, Amber sent a **text to Raquel** asking her to come over to PH3... I was in PH5 with Liz... **Approximately 15 minutes later**, we heard Johnny shouting, and saw (through the peephole) both of his security team rush over in the direction of PH3. ... **At 8:46PM**, I started getting **calls from his head of security**, Jerry, as Johnny had left his phone there...
- **22. 05. 2016 – Amber Heard's statement** (AmHe 16-05-21 st)
- **22. 05. 2016 – Elizabeth Marz' statement** (ElMa 16-05-21 st)
- **22. 05. 2016 – Raquel Pennington's statement** (RaPe 16-05-21 st) was sent to AH in an email on 22. 5. 2016 at 21:43 and is on p. E405 – E406 of exhibit 16 which is part of exhibit JD1 of his UK witness statement from 12. 2. 2020, p. E171 – E295 ([JoDr 20-02-12 w](#)) ✓
 - At **approximately 7:15**, Amber informed me that her husband **Johnny would be coming over shortly**... **At 8:06PM** I received a **text from Amber**... **At 8:09PM** I **texted back** to confirm she needed me immediately. **At 8:11PM** I **knocked** on the door. ... I went back, grabbed my keys, knocked again... ... I heard him yelling and breaking thins for the next **15-30 minutes** in the hallway and other apartments.
- **23. 05. 2016 – AH's petition for dissolution of marriage** ([AH-PetitDissolution](#) & [here](#)) ✓
 - married 3. 2. 2015, separated 22. 5. 2016
- **24. 05. 2016 – AH's extortion letter/email** ([AH-ExtortLetter](#) & [email1](#) + [email2](#)) is also part of HeardTRO3.pdf from buzzfeed/deppdive, p. 20 – 22 of pdf ([HeardTRO3](#)) ✓
 - ...which is... why we did not arrange for Johnny to have been personally served at last night's movie premiere.
- **25. 05. 2016 – JD's response and request for dissolution of marriage** (JD-RequDissol & [jpg1](#), [jpg2](#), [jpg3](#), [jpg4](#), [jpg5](#)) ✓
 - date of marriage is 3. 2. 2015
- **26. 05. 2016 – Amber Heard's declaration for TRO = affidavit** ([AmHe 16-05-26 dc1](#)) is also part of exhibit 34 in AH's motion for leave for briefing schedule and evidentiary hearing on motion to dismiss from 11. 4. 2019, p. 171 – 174 of pdf ([brief-sched](#)) and also part of HeardTRO3.pdf from buzzfeed/deppdive, p. 26 – 30 of pdf ([HeardTRO3](#)) ✓
 - ...we were married on February 3, 2015.
 - incidents: Apr 21 2016 (par. 7), May 21 2016 (par. 9 – 20), several prior incidents ... one severe incident in Dec 2015 (par. 21) [[setting the ground](#)]
 - 22-23. requests: exclusive possession of PH3, Range Rover, Pistol, \$50,000 a month
 - photos of injuries and property damage (not in either pdf)
- **26. 05. 2016 – AH's ex parte notice for court hearing for TRO**
- **26. 05. 2016 – Laura Wasser's declaration** ([LaWa 16-05-26 dc1](#) and [dc2](#)) is part of HeardTRO3.pdf from buzzfeed/deppdive, p. 14 – 15 of pdf ([HeardTRO3](#)) ✓

- 4. On Thursday, May 26, 2016, I received ex parte notice ... for a hearing ... indicated that Amber would seek a temporary restraining order...
- 5. It is my understanding that Johnny is currently out of the country working in Spain for the next several weeks and will not return before June 7, 2016, at the earliest.
- **26. 05. 2016 – AH's request for temporary restraining order** ([jpg1](#), [jpg2](#), [jpg3](#), [jpg4](#), [jpg5](#), from [deppdive](#)) is part of HeardTRO3.pdf from buzzfeed/deppdive, p. 21 – 25 of pdf ([HeardTRO3](#)) ✓
 - 10. I ask for the right to record communications made to me by the person in ② [JD] that violate the judge's order. it's checked. [wait a minute, is this why she set up the July meeting and secretly recorded it?]
 - 11. She only asks for Pistol here, cause he is her pet.
 - 14. wants the whole residence at the Eastern
 - 21. wants court to order JD to go to a 52-week batterer intervention program
 - 22. wants court to order JD to go to a 52-week anger management course
 - 26g. the box for "has the person in ② [JD] abused you other times?" is not checked [only May 21 incident here! this already contradicts her declaration from the same day where she mentions three incidents.]
- **27. 05. 2016 – Raquel Pennington's declaration = affidavit** (RaPe 27-05-27 dc) is exhibit 5 which is part of exhibit JD1 of Joshua Drew's UK witness statement from 12. 2. 2020, p. E335 – E345 ([JoDr 20-02-12 w](#)), part of exhibit 34 in AH's motion for leave for briefing schedule and evidentiary hearing on motion to dismiss from 11. 4. 2019, p. 176 – 178 of pdf, with only three black/white photos ([brief-sched](#)), and also part of HeardTRO3.pdf from buzzfeed/deppdive, p. 31 – 32 of pdf, no photos ([HeardTRO3](#)) ✓
 - 3. Ms. Pennington was friends with AH since 2003.
 - 4. On May 21, 2016, ... I received a text message from Amber at approximately 8:06 p.m., asking me to come over...
 - reddish [photo](#) of AH without visible clothes with a lamp in the background with alleged red markings below and around the R eye (p. E341, exh. A)
 - reddish [photo](#) of AH in front of wire-looking hangers with alleged red markings around the R eye, but there is no 'bruise' as on the previous photo (p. E342, exh. A)
 - too-exposed [photo](#) of AH in blue clothes with alleged red markings around the R eye, which again is different then the first and second photo (p. E343, exh. A)
- **27. 05. 2016 – Samantha Spector's declaration** ([SaSp 16-05-27 dc1](#) and [dc2](#)) is part of HeardTRO3.pdf from buzzfeed/deppdive, p. 16 – 18 of pdf ([HeardTRO3](#)), part of exhibit 34 in AH's motion for leave for briefing schedule and evidentiary hearing on motion to dismiss from 10. 4. 2019, p. 184 – 185 ([brief-sched](#)), also part of exhibit B of AH's memorandum in opposition to JD's motion to use prior depositions from 6. 12. 2019, p. 85 – 92 of pdf ([AH-MemoOppPriorDepos](#)) ✓
 - there is no mention of the phone call on May 21
 - 3. AH is now requesting exclusive use and possession of the 849 S. Broadway residence [the request has moved from PHs 1, 3 and 5 to the whole residence! I just had a thought. what if one of the hings AH has over Ms. Pennington, Mr. Drew, Ms. Henriquez, and Mr. Wright are the rent and other apartment expenses for the

whole time they were freeloading off JD? and what if this extortion was one of the reasons she wanted to keep the residence?]

- [email](#) from Ms. Spector to Laura Wasser, JD's lawyer, informing them about the intent to file TRO, from 26. 5. 2016 (p. 88 of pdf, exh. A)
- [email1](#) + [email2](#) from Ms. Spector to Jacob Bloom, JD's lawyer, the 'extortion letter', from 24. 5. 2016 (p. 91 – 92 of pdf, exh. B) [*she mentions photographs depicting property damage as well as physical injuries to AH*]
- **27. 05. 2016 – AH's income and expense declaration** ([AH-IncomeExpense](#) & [jpg1](#), [jpg2](#), [jpg3](#), [jpg4](#), [jpg5](#), [jpg6](#), [jpg7](#), [jpg8](#), [jpg9](#), from [deppdive](#)) ✓
 - started working on 10. 2. 2009 [*referring to The Rum Diary? cause surely that was not her first ever job.*]
 - *there are two different expenses files, but the expenses differ by a lot*
- **27. 05. 2016 – notice of court hearing for TRO on Jun 17** ([jpg1](#), [jpg2](#), [jpg3](#), from [deppdive](#)) is also part of HeardTRO3.pdf from buzzfeed/deppdive, p. 1 – 3 of pdf ([HeardTRO3](#)), and part of exhibit 35 in AH's motion for leave for briefing schedule and evidentiary hearing on motion to dismiss from 10. 4. 2019, p. 192 – 195 ([brief-sched](#)) ✓
- **27. 05. 2016 – temporary restraining order (AH-TRO)**([jpg1](#), [jpg2](#), [jpg3](#), [jpg4](#), [jpg5](#), [jpg6](#), from [deppdive](#)) *TRO granted* is part of HeardTRO3.pdf from buzzfeed/deppdive, p. 4 – 9 of pdf ([HeardTRO3](#)), and part of exhibit 35 in AH's motion for leave for briefing schedule and evidentiary hearing on motion to dismiss from 10. 4. 2019, p. 196 – 201 ([brief-sched](#)) ✓
 - [*did JD actually ever had black hair as listed on TRO?*]
- **27. 05. 2016 – JD's opposition to AH's ex parte notice application** ([JD-OppExParte](#), from [deppdive](#)) is also part of HeardTRO3.pdf from buzzfeed/deppdive, p. 10 – 13 of pdf ([HeardTRO3](#)) ✓
 - I. *Amber is attempting to secure a premature financial resolution by alleging abuse.* Her current application for a temporary restraining order along with her financial requests appears to be in response to the negative media attention she received earlier this week after filing for divorce.
 - II. *The majority of the relief she requests is purely financial in nature.*
- **???. 06. 2016 – JD offers AH \$50,000 spousal support for mutual restraining order**
 - [*is this where JD offered AH \$50,000 a month for eight months for a mutual restraining order? all I could find was articles*, for example *Amber Heard 'rejects \$50,000 spousal support offer over MUTUAL restraining order' as estranged husband Johnny Depp escapes to private island in The Bahamas* by Caitlin O'Toole for [Daily Mail](#) from 11. 6. 2016, 3:29 GMT, and *Amber Heard has reportedly rejected an offer of spousal support from Johnny Depp* by Ellen Scott for [Cosmopolitan](#) from 12. 6. 2016]
- **13. 06. 2016 – Amber Heard's declaration** ([AmHe 16-06-13 dc](#) & [jpg1](#), [jpg2](#), [jpg3](#), [jpg4](#), [jpg5](#), from [deppdive](#)) ✓
 - 3. In light of the coordinated false and negative media campaigning falsely depicting my attempts to attain a CLETS Domestic Violence Restraining Order as being financially motivated, *I am hereby withdrawing the request from my pending CLETS*

Domestic Violence Restraining Order for *pendente lite* spousal support, while reserving all my rights in the existing general Family Law action.

- 4. It is my layperson understanding, that it is standard operating procedure to request *pendente lite* spousal support in a divorce action where there is a great disparity between the relative incomes of the parties.
- 5. Based on published estimates, Johnny made at least \$30,000,000 in 2015. Accordingly, the attached DissoMaster calculation prepared by my counsel, shows that even if I were to be imputed with an income of \$20,000 per month, the Court could have ordered *pendente lite* spousal support in the amount of \$943,744 per month.
- [DissoMaster calculation](#) (exh. A) [I don't get much from this form, except that AH was probably very jealous of JD's income?]
- **13. 06. 2016 – iO Tillet Wright's declaration** ([iO 16-06-13 dc](#) & [jpg1](#), [jpg2](#), [jpg3](#), from [deppdive](#)) is exhibit 38 in AH's motion for leave for briefing schedule and evidentiary hearing on motion to dismiss from 10. 4. 2019, p. 216 – 218 of pdf ([brief-sched](#)) ✓
 - article *Why I Called 911* by iO Tillet wright for [Entertainment News](#) from 8. 6. 2016, 16:00 (p. 220 – 225 of pdf, exh. 38)
- **16. 06. 2016 – Raquel Pennington's deposition** (RaPe 16-06-16 dp1) but only p. 57 – 58 are exhibit 1-F in JD's opposition to motion to dismiss from 20. 5. 2020, p. 83 – 89 of pdf ([JD-OppDismiss](#)); a tiny part of it can be [viewed](#) (1:51) on twitter and on [deppdive](#) (1:51), and also at 18:58–22:11 of [Incredibly Average's](#) 1. 5. 2020 *Amber Heard & Friends: Constant Contradictions!* ✓
 - [Apr 21 2016] Ms. Pennington spent 35 min in the PH with JD (p. 58)
 - subpoena for personal appearance (p. 13, exh. 1)
 - Raquel Pennington's declaration from 27. 5. 2016 (p. 151, exh. 2)
- **16. 06. 2016 – hearing of JD's request for continuance which is granted for Aug15** ([jpg](#)) ✓
- **16. 06. 2016 – modification of TRO** ([jpg](#)) ✓
 - TRO shall remain in full force and effect... Exception to the Stay-Away Order – **upon terms agreed to in writing by the parties and Counsel, the parties and their Counsel may attend meetings together to engage in settlement discussions.**
- **16. 06. 2016 – notice of new hearing and order on reissuance** ([jpg1](#), [jpg2](#), [jpg3](#)) ✓
 - hearing scheduled for 17. 6. is reset to 15. 8.
- **16. 06. 2016 – TRO extended till Aug 9** as per stipulation and order re[garding] dismissal of AH's request for TRO from 16. 8. 2016 which is exhibit D in her memorandum in opposition to JD's motion to use prior depositions from 6. 12. 2019, p. 104 – 105 of pdf ([AH-MemoOppPriorDepos](#)) ✓
- **?? 06. 2016 – Isaac Baruch's declaration** (IsBa 16-06-?? dc) is on p. 112 – 115 and an extracts are 12.c of JD's 1st UK witness statement from 22. 1. 2019 ([JD 19-01-22 w1](#) but it doesn't have exhibits) and exhibit 1-L in JD's opposition to motion to dismiss from 20. 5. 2020, p. 185 – 190 of pdf ([JD-OppDismiss](#)) ✓
 - very similar to his UK witness statement
 - 2. On May 21, 2016, ... [I and a friend] **returned** to [the ECB] **between 9:00 PM and 9:30 PM**... [We] stopped in front of penthouse 1 because on the floor and wall

directly in front of and leading into Penthouse 1 was a very large spill and splatter of wine. [note that this must be *after* the second set of officers with bodycams already left as they passed right by PH1 on their way from the elevator to PH3 and there was nothing in the hallway, see footage of [bodycam 1](#) and [bodycam 2](#), both also in the video by [Come Geek Some](#) from 17. 4. 2021 (1:02–4:00 and 6:19–8:42)]

- 3. On May 22, 2016,... I encountered two locksmiths, an unknown man dressed in black clothing, Amber Heard, and her boyfriend Josh Drew [AH's boyfriend, huh? it's a typo because Raquel Pennington is missing]
- June 3, 2016, Friday evening, ... I responded by saying "I think its best that we don't talk anymore because I'm confused, angry and frustrated by what I've been seeing"
- **?? 06. 2016 – Sean Bett's declaration** (SeBe 16-06-?? dc) is on p. [107](#) – [108](#) and an extract is 12.a of JD's 1st UK witness statement from 22. 1. 2019 ([JD 19-01-22 w1](#) but it doesn't have exhibits) ✓
 - [21. 5. 2016 Divorce] Within approximately 15-20 minutes we heard Amber screaming at the top of her lungs and immediately entered the penthouse.
- **?? 06. 2016 – Jerry Judge's draft declaration** (JeJu 16-06-?? dc; [jpg](#)) is on p. 109 – 111 and an extract is 12.b of JD's 1st UK witness statement from 22. 1. 2019 ([JD 19-01-22 w1](#) but it doesn't have exhibits) ✓
 - [21. 5. 2016 Divorce] ...we arrived at the loft between the hours, approximately, of 7:00 and 7:30 PM... About 30 minutes or less later, Sean and I re-entered the loft... [article 'Ear-Witnesses' Say She's a Liar, Johnny Wasn't Near Her for [TMZ](#) from 31. 5. 2016, 1:00 PT]
- **12. 07. 2016 – LAPD Custodian of Records declaration** is exhibit 506 in JD's exhibits list from 8. 8. 2016
- **14. 07. 2016 – Raquel Pennington's deposition** (RaPe 16-07-14 dp) but only p. 201, 340 – 341 are exhibit 1-F in JD's opposition to motion to dismiss from 20. 5. 2020, p. 90 – 96 of pdf ([JD-OppDismiss](#)) ✓
 - [May 21 2016] Jerry Judge and Sean Bett were at the scene (p. 340)
 - photo from Coachella trip (p. 227, exh. 3) (not in pdf) [is this perhaps this [photo?](#)]
 - printout of texts from between 20. 4. and 26. 4. 2016 (p. 232, exh. 4) (not in pdf)
 - photos A – G (p. 371, exh. 5) (not in pdf)
- **15. 07. 2016 – Elizabeth Marz' deposition** ([EIMa 16-07-15 dp](#)) is incomplete, only p. 353, also as exhibit 1-H in JD's opposition to motion to dismiss from 20. 5. 2020, p. 101 – 106 of pdf ([JD-OppDismiss](#)) ✓
 - But there was extensive damage to which we have plenty of evidence. (p. 353)
 - By the time the second set of officers arrived, we had cleaned up the kitchen and cleaned up a bit and cleaned up, yeah. (p. 353)
 - By the time the first officers arrived, had you cleaned up any damage to Penthouse 5? – I don't think so. (p. 353)
 - subpoena for personal appearance and production of documents and things issued to Elizabeth Marz (exh. 1) (not in pdf)
 - document titled 'Non Party Elizabeth Marz' objection to Respondent's deposition subpoena for personal appearance and production of documents (exh. 2) (not in pdf)

- screenshot of texts from 9. 6. 2016 (exh. 3) (not in pdf)
- **18. 07. 2016 – officer Tyler Hadden's deposition** ([TyHa 16-07-18 dp](#)) is a very bad copy, but good copies are exhibit B in JD's memorandum in support of motion to use prior depositions from 22. 11. 2019, p. 49 – 96 of pdf ([JD-MemoPriorDepos](#)), exhibit 1-J in JD's opposition to motion to dismiss from 20. 5. 2020, p. 157 – 177 of pdf ([JD-OppDismiss](#)), and exhibit 3 in Joshua Drew's UK witness statement from 12. 2. 2020, p. E314 – E333 ([JoDr 20-02-12 w](#)) ✓
 - he is a P-1 probationer, working with a training officer who is P-3 (p. 11)
 - he is currently on his third month in the field (p. 12) [so, in May, it was his first month in the field, then]
 - when they arrived at the PH floor, they didn't hear any screaming or crying or objects being thrown, so they walked around, out at the back patio and back into the hallway, and only then met a male neighbour (p. 17)
 - Whether she wanted to make a report or not, that was her decision... (p. 21)
 - 5–10 min went by between Mr. Drew speaking to them and AH coming out of PH1 (p. 21)
 - It was that penthouse [when they did the protective sweep] and then one that connects to their penthouse. (p. 35)
 - the neighbouring penthouse ... was described by Mr. Drew as their working space ... they created jewelry. (p. 36 – 37)
 - [I'm a tad confused here. if they went from AH's PH3 to PH5 directly, they must have passed through PH4 which is one big space, right? and that wasn't mentioned as a separate PH? was it considered part of PH3 by AH? as in 'hers?'] [this conundrum of PHs was addressed by Linda and Les in *Did Amber Mislead the LAPD?* or "*Penthouse 4 Theory*" posted by [SEC](#) (23. 9. 2021, 41:06). the conclusion they reached was that the party didn't take them into PH3 but into PH4 across the hallway from PH1 and then to the adjacent PH5. from the [bodycam 1](#) and [bodycam 2](#) footage and [2Dplan](#) and [3Dplan](#) we can see that PH4 and PH3 are both in a corner of the hallway next to each other, so technically "across the hall" it could mean either.]
 - they went ... just [to] the two penthouses. (p. 38)
- **18. 07. 2016 – officer Melissa Saenz' deposition** ([MeSa 16-07-18 dp](#)) is also exhibit A in JD's memorandum in support of motion to use prior depositions from 22. 11. 2019, p. 9 – 47 of pdf ([JD-MemoPriorDepos](#)), exhibit 1-I in JD's opposition to motion to dismiss from 20. 5. 2020, p. 108 – 155 of pdf ([JD-OppDismiss](#)), and exhibit 2 in Joshua Drew's UK witness statement from 12. 2. 2020, p. E297 – E313 ([JoDr 20-02-12 w](#)) ✓
 - Mr. Saenz [and her partner] responded at 20:49. (p. 11)
 - Mr. Drew's apartment is across the hall from Ms. Heard's apartment. (p. 16)
 - We went just across the hall [from PH1] to where her [AH's] apartment was. ... She never stated that the incident occurred. (p. 22)
 - ... there was a sofa in the entryway [of AH's PH]. ... the PH ... is one large space [a living room with a kitchen area] (p. 24 – 25)
 - After we completed the sweep of the first penthouse that we were standing in, the male advised me that the next door penthouse also belonged to Ms. Heard, and he

walked us over, unlocked the door, and my partner and I did a sweep of that penthouse as well. ... **It was many racks with a lot of white clothing...** And I remember continuing upstairs and we checked the whole loft and everything seemed ordinary. (p. 29 – 30) [**so, AH already looked at the PHs as hers?**]

- I advised her that we checked both of the lofts or the penthouses... (p. 32)
- I issued her one [business card] and I issued her neighbors one, as well. (p. 33)
- I had a supervisor advise me that a second patrol unit got dispatched there, as well, and their findings were the same as ours. [that was about two weeks later] (p. 38)
- [this conundrum with penthouses was debated by Linda and Les in *Did Amber Mislead the LAPD?* or "*Penthouse 4 Theory*" and posted by [SEC](#) (23. 9. 2021, 41:06)]
- **28. 07. 2016 – Cornelius Harrell's deposition** (CoHa 16-07-28 dp) is on p. 207 – 251 and an extraxt is 12.e of JD's 1st UK witness statement ([JD 19-01-22 w1](#) but it doesn't have exhibits)
- **?? 07. 2016 – Trinity Esparza's deposition** (TrEs 16-07-?? dp; [jpg](#)) is on p. 116 – 206 of JD's 1st UK witness statement ([JD 19-01-22 w1](#) but it doesn't have exhibits)
- **08. 08. 2016 – Gaylynn Summerlin's deposition** (GySu 16-08-08 dp) is mentioned in AH 5th UK witness statement, par. 82
- **08. 08. 2016 – JD's witness list** ([html](#); [jpg1/jpg1](#), [jpg2/jpg2](#), [jpg3/jpg3](#), [jpg4/jpg4](#)) ✓
 - witnesses: AH, officer Hadden, officer Saenz, Trinity Esparza, Alex Romero, Gaylynn Sumerlin, Michael Weiner, Cornelius Harrell, Raquel Pennington, Kevin Murphy, Hilda Vargas, Sean Bett, Jerry Judge, Travis McGivern, Zeev Haskal (related to AH's 2009 arrest), Bruce Witkin, Starling Jenkins, Nathan Holmes, Isaac Baruch, Edward White, Jodi D. Gotlieb, Joshua Drew, Vanessa Paradis
- **08. 08. 2016 – JD's proposed list of exhibits** ([html](#); [jpg1/jpg1](#), [jpg2/jpg2](#), [jpg3/jpg3](#), [jpg4/jpg4](#), [jpg5/jpg5](#)) ✓
 - 503, 504, 505. audio disks 1 and 2 from LAPD [**these must be 911 calls and the audio call between NYPD and LAPD**]
 - 507. Port of Seattle Police Department Sep. 14, 2009 – Arrest and Prosecution Records of Petitioner in State of Washington v. Amber Van Ree
 - 508. April 18, 2016 Order – Petitioner – Australia Criminal Case
 - 509. April 22, 2016 Photographs [of faeces in bed]
 - 511. Photographs – Respondent – December 15, 2015 [presumably [photo 1](#), [photo 2](#), and [photo 3](#) of JD's scratched and bruised face]
 - 529. April 22, 2016 Instagram Video [**of AH driving to Coachella?**]
- **08. 08. 2016 – AH's witness list** ([jpg1](#), [jpg2](#), [jpg3](#), from [deppdive](#)) ✓
 - witnesses: Johnny Depp, Amber Heard, iO Tillet Wright, Raquel Pennington, Joshua Drew, Elizabeth Marz, Nancy Kaser-Boyd (clinical and forensic psychology relating to characteristics and traits of victims of domestic violence)
- **09. 08. 2016 – TRO extended to Aug 17** as per stipulation and order re[garding] dismissal of AH's request for TRO from 16. 8. 2016 which is exhibit D in her memorandum in opposition to JD's motion to use prior depositions from 6. 12. 2019, p. 104 – 105 of pdf ([AH-MemoOppPriorDepos](#)) ✓
- **13. 08. 2016 – Amber Heard's deposition** ([AmHe 16-08-13 dp](#)), p. 353 is exhibit 1-E and p. 5 – 7, 348, 353, 369 – 377, 382 – 395 are on p. 42 – 73 of pdf in JD's opposition to

motion to dismiss from 20. 5. 2020, ([JD-OppDismiss](#)), and parts of the transcript are exhibits 10 (p. 73 – 78 of pdf), 17 (p. 103 – 107), 18 (p. 108 – 111), 19 (p. 113 – 121), 20 (p. 125 – 130), 24 (p. 132 – 137), 25 (p. 140 – 142) and 30 (p. 150 – 152) in AH's memorandum in support of her motion to dismiss from 11. 4. 2019 ([brief-sched](#)); [listen & view](#) (15:22) it on Arbuckling's YT (19. 3. 2020), and also on [deppdive](#): [video 1](#) (1:40), [video 2](#) (1:52), [video 3](#) (3:49), [video 4](#) (1:20), [video 5](#) (12:21), [video 6](#) (0:33), [video 7](#) (2:40) ✓

- So at the very beginning, I would only tell my mom [that she had been physically abused] ... That's why I had pictures. (p. 306) [oh? so pictures did start from the very beginning then?]
- Penthouse 5 was destroyed. ... There was clear damage done downstairs in Penthouse 5. (p. 348)
- But there was extensive damage [to PH5] to which we have plenty of evidence. (p. 353)
- Um, by the time the second set of officers arrived, we had cleaned up the kitchen and cleaned up a bit and cleaned up, yeah. (p. 353) [in PH5]
- reference to a clip of an **audio recording, exhibit P**: "I then stood up. I don't even know if I said – I mean I might have said like 'What the fuck', you know, whatever, because I had just been hit in the head with the fucking corner of the door." -- "I'm so sorry I did that. I'm sorry." -- "And then I stood up. And then you fucking clocked me." -- "I remember hitting you as a response to the door thing. And I'm really sorry about hitting you with the door. It was – or hitting your head." (p. 369 – 373) [[excerpt](#) (2:39)]
- reference to a clip of an **audio recording, exhibit Q**: "Anyway, I opened the bathroom door when you were knowcking on it. After a few times, I opened, and, you know, you just kept come – you just kept going, kept going. I tried to close the door three times, you know. Please, please, just don't let – you know, and then –" - - "Babe--" -- "Wait. And then I then I – I – I – accidentally, I swear, when I was trying to close the door, I guess it scraped your toes. I – you know, I didn't mean to do that. And I bent down and you either pushed or you kicked – I think you kicked the door open." ... -- "I did not man to do that. ... I did not kick the door or push the door so that it would hit you. I did not. I swear. ... it was not my intention. I think I remember when the door scraped my toes." ... -- "So let's say that was an accident. I then stood up. I don't even know what I said. I mean I might have said like 'What the fuck', you know, whatever, because I had just been hit in the head with the fucking corner of the door." -- "I'm so sorry I did that. I'm sorry." -- "And then I stood up. And then you fucking clocked me." -- "I remember hitting you as a response to the door thing. And I'm really sorry about hitting you with the door. It was – or hitting your head." -- "You didn't not mean to hit me in the head with the door, but you meant to punch me in the jaw." -- "I meant to hit you and I – I did not do this thing with the door. I do remember I did mean to hit you." (p. 372 – 377) [part of the same [excerpt](#) (2:39)]
- ...have you ever thrown... an object prior to today at Mr. Depp that hit him? -- I don't know what has hit him. (p. 383) [so, apparently sth has hit him.]

- photo labeled "The Day After" (exh. A)
- screenshot with "Amber" with texts from 18. 4. 2016, 8:32 and 24. 5. 2016, 17:19 (exh. B)
- screenshot with "AH" with text from 24. 5. 2016, 12:09 (exh. C)
- screenshot with "Slim" with texts from 24. 5. 2016, 00:34 and 3:07 (exh. D)
- screenshot with "Slim" with texts from 24. 5. 2016, 11:10, 24. 5. 2016, 18:01, and 25. 5. 2016, 4:33 (exh. E)
- summons and [petition](#) for dissolution case no. BD641052 from 23. 5. 2016 (exh. F)
- screenshot with "Slim" with texts from 25. 5. 2016, 4:33 and 9:35 (exh. G)
- JD's notice of deposition of AH & RFP (exh. H)
- photo of faeces on bed (exh. I) [possibly this [photo](#)]
- [close-up](#) of faeces on bed (exh. J)
- attachment to form DV-100 titled "[Declaration](#) of Amber Laura Heard" (exh. K)
- two screenshots with "Slim" with text from 21. 4. 2016, 9:40 (exh. L)
- screenshot with "Steve" with text from 12. 3. 2013, 14:37 (exh. M)
- photo of AH and friends at Coachella (exh. N) [probably this [photo](#)]
- screenshot with "savannahmcmillan" with photo and texts from 26. 4. 2016 (exh. O)
- CD with [audio](#) files labeled "Clocking JD" (exh. P)
- CD with [audio](#) files labeled "Amber Admits Punch" (exh. Q)
- [article *Amber Heard 'Cried', 'Yelled' and 'Screamed' on Her Deposition Day, Johnny Depp's Lawyer Claims* by Tim Kenneally for [The Wrap](#) from 9. 8. 2016, 18:51. **prior to the Aug 2016 deposition, she brought up excuses that she was in London, at a wedding, had a costume fitting, and that her lawyer was unavailable. on the deposition day, she showed two hours late, refused to go on record to testify, cried on the phone, yelled, screamed and paced in a separate room. apparently, this is not the only deposition AH has tried to avoid. the producer of *London Fields* has had to compel her and threaten sanctions because she has been avoiding sitting for her deposition for eight months: *Amber Heard Evading Deposition, Says 'London Fields' Producer* by Eriq Gardner for [Hollywood Reporter](#) from 27. 10. 2017, 14:43 PDT.]**
- **15./16. 08. 2016 – AH's exhibit list** ([jpg1](#), [jpg2](#), [jpg3](#), [jpg4](#), [jpg5](#), from [deppdive](#)) ✓
 - 1. – 6. photos of alleged injuries and texts from May 21 to May 27
 - 7. photos of house in Australia from 2015
 - 8. AH's medical intake form from 2015
 - 9. audio tapes and transcripts from 2015 and 2016
 - 10. photo of AH holding pills in hand from 19. 8. 2014
 - 11. photo of JD from 7. 8. 2014
 - 13. video/audio recording of JD speaking to AH at their residence from 2016 [**the Eastern? is this sth we haven't seen yet?**]
 - 16. – 18. cctv footage from the Eastern from 21. 5. 2016
 - 24. articles AH put into press after 21. 5. 2016

- 28. AH's medical records relating to prior incident of domestic violence [which incident? what medical records? I don't remember any being brought up in the UK case.]
- 15. – 16. 08. 2016 – the settlement agreement or the divorce settlement or Deal Point Memorandum (DPM) ([DPM](#))
 - paragraphs between the DPM and the stipulated judgement appear to match in most part, except for those with equalization payments: DPM 8.1 = SJ 8.1, DPM 8.3 = SJ 8.3, DPM 8.4 = SJ 8.4, DPM 17a = ?SJ 4.2, DPM 19 = SJ 4.4 – equalization payments, DPM 20.1 = SJ 20.1, DPM 20.3 = SJ 20.3, DPM 20.4 = SJ 20.4, DPM 21.6 = SJ 21.6, DPM 21.15 = SJ 21.15, DPM 21.16 = SJ 21.16
 - DPM 40 – list of witnesses and exhibits relevant to the divorce
- 16. 08. 2016 – stipulation and order re[garding] dismissal of AH's request for TRO ([jpg1](#), [jpg2](#) & [TRO-dismissal](#)) dismissal of TRO is exhibit D in her memorandum in opposition to JD's motion to use prior depositions from 6. 12. 2019, p. 104 – 105 of pdf ([AH-MemoOppPriorDepos](#)) [TRO is dismissed with prejudice, which means it can't be brought back to court] ✓
- 02. 09. 2016 – AH dismissed charges against Doug Stanhope
- 15. 09. 2016 – JD's preliminary/final declaration of disclosure
- 21. 10. 2016 – AH's preliminary/final declaration of disclosure (
- 13. 01. 2017 – stipulated judgement of the dissolution of marriage (StipulJudge) dissolution of marriage is exhibit 39 in AH's motion for leave for briefing schedule and evidentiary hearing on motion to dismiss from 11. 4. 2019, p. 228 – 282 of pdf ([brief-sched](#)) and exhibit A in AH's memorandum in opposition to JD's motion to use prior depositions from 6. 12. 2019, p. 10 – 64 of pdf ([AH-MemoOppPriorDepos](#)) ✓
 - 3.2.25 what is the option contract associated with *The Evidence Never Lies* which JD gets?
 - [4.1.1](#) \$200,000 on or before August 31, 2016. Petitioner and Respondent acknowledge and agree that said payment was made by Respondent as follows: \$100,000 to the American Civil Liberties Union and \$100,000 to Children's Hospital of Los Angeles. Petitioner and Respondent further acknowledge and agree that Respondent shall be entitled to claim this charitable contribution on his federal and state income tax returns.
 - 4.1.2 \$100,000 within three (3) days of entry of this Judgement
 - [4.1.3](#) \$1,000,000 on or before February 1, 2017; \$1,000,000 on or before May 1, 2017; \$1,000,000 on or before August 1, 2017; \$500,000 on or before November 1, 2017; \$2,300,000 on or before February 1, 2018 [so the last payment was 1. 2. 2018]
 - 8.1 TRO is dismissed with prejudice
 - 8.2. AH dismissed, without prejudice, suit against Doug Stanhope
 - 8.4 AH represents that she has not filed a police report claiming there was any criminal wrongdoing by JD, AH shall not be limited in any way with fully complying with any valid legal process or cooperating with any law enforcement investigation
 - 20.1 neither AJ nor JD shall discuss, publish or post or cause to be discussed, published or posted, directly or indirectly, any information pertaining to the

parties' premarital relationship, marriage or this dissolution action on the internet (incl., but not limited to, social media publications, websites, blogs, news periodicals, etc.) or in the media in any manner. AH and JD shall also instruct their respective agents, friends, family members, and representatives not to communicate and/or act in any way contrary to this provision.

- 20.3 both also acknowledge, agree, warrant, represent and covenant that, except as may be required by law, they shall refrain from making or causing to be made, and agrees not to make or cause to be made, any derogatory, disparaging, critical or accusatory statements, either directly or indirectly, express or implied, oral or written, concerning the other party, whether said statement are believed to be true or not
- three photos of JD publicly recognizing his relationship for what it was: [photo1](#) with 'help' tattoo, [photo2](#) with 'dumb' tattoo, [photo3](#) with 'dumb' tattoo

UK trial – Johnny Depp vs NGN and Dan Wootton Libel Trial

6. 2018 – 25. 3. 2021

claim no. QB-2018-006323

appeal ref. A2/2020/2034

- many depositions and witness statements are part of another legal document, as can be seen from page numbering
- **27. 04. 2018 – online copy of The Sun article** [The Sun article](#) *GONE POTTY How can JK Rowling be 'genuinely happy' casting wife beater Johnny Depp in the new Fantastic Beasts film?* by Dan Wootton for [The Sun](#) is also on p. 1 – 5 of exhibit LC1 in Louis Charalambous' 1st witness statement from 29. 11. 2018
- **28. 04. 2018 – hardcopy of The Sun article**
- **02. 05. 2018 – JD's letter of claim**
 - Katherine Kendall's text accusing NGN of misquoting and misrepresenting her words
- **15. 05. 2018 – NGN's reply letter** denying the claim
- **01. 06. 2018 – JD's claim** (JD-ClaimUK) is on p. 9 – 20 of exhibit LC1 in Louis Charalambous' 1st witness statement from 29. 11. 2018
- **13. 06. 2018 – JD's particulars of claim** (JD-ComplaintUK) **JD's claim = complaint** are attachment 2 in AH's memorandum in support of plea in bar from 13. 4. 2021, p. 44 – 55 of pdf ([AH-MemoPleaBar](#)) and also attachment in many subpoenas
- **11. 07. 2018 – NGN's (original) defense** (NGN-Defense) is on p. 21 – 26 of pdf of exhibit LC1 in Louis Charalambous' 1st witness statement from 29. 11. 2018
- **20. 07. 2018 – JD's reply** (JD-ReplyUK)
- **11./12. 10. 2018 – AH serves notice of an arbitration demand**
- **29. 11. 2018 – NGN's application** (NGN-Application)
 - NGN applied for a stay of the present action on the grounds that they wished to rely on the evidence of Ms Heard but she was inhibited from assisting them because of confidentiality restrictions in the divorce agreement. [hmm. is this around the time when she started to produce multiple photographs that were to corroborate her story? Mr. Latulippe's metadata analyses did find out that a number of photographs from December 2015 and May 2016 were created on or after 20. 7. 2018 and on or after 6. 10. 2018. (p. 8 and 11, [NGN-OppForensEvid](#))]

- **29. 11. 2018 – Louis Charalambous' 1st witness statement** (LoCh 18-11-29 w)
 - exhibits are LC1
 - article *GONE POTTY How can JK Rowling be 'genuinely happy' casting wife beater Johnny Depp in the new Fantastic Beasts film?* by Dan Wootton for [The Sun](#) from 27. 4. 2018 (p. 1 – 5)
 - Johnny Depp's particulars of claim from 1. 6. 2018 (p. 9 – 20)
 - NGN's defense from 11. 7. 2018 (p. 21 – 26)
 - JD's Reply from 20. 7. 2018
 - article *Amber Heard's Domestic Violence Claim Against Johnny Depp Being Investigated by LAPD* by Maane Khatchatourian for [Variety](#) which states that LAPD officers found no evidence of an assault and that AH didn't want to file a criminal report, from 31. 5. 2016, 8:20 PT (p. 62) [article is my guess!, it may be this article: *Amber Heard – Cops Say No Evidence of Injuries* for [TMZ](#) from 27. 5. 2016, 12:26 PT]
 - article *Amber Heard and Johnny Depp Settle Divorce Case, Restraining Order Request Withdrawn* by Antoinette Bueno for [Etonline](#) from 16. 8. 2016, 9:15 PDT (p. 63 – 69)
 - article *Amber Heard's Legal Team Disputes Johnny Depp's 'Shameful' Statements in New 'GQ' Interview* by Liz Calvario for [ETonline](#) from 3. 10. 2018, 20:51 PDT (p.) [article is my guess!]
 - article *Amber Heard didn't report abuse by Johnny Depp in order to protect him attorneys say* by Libby Hill for [Daily Mail](#) from 31. 5. 2016, 12:37 PT (p. 70 – 87) incl. info from LAPD, shortly after TRO; or this article: *Amber Heard Didn't Report Johnny Depp's Alleged Domestic abuse to LAPD to Protect His Career and Her Privacy, She Says*, by Jodi Guglielmi for [People](#) from 31. 5. 2016, 9:40
 - article *Why I Called 911* by iO Tillet wright for [Entertainment News](#) from 8. 6. 2016, 16:00 (p. 88 – 89)
 - stipulated judgement of the dissolution of marriage from 13. 1. 2017 (p. 90 – 145)
 - letter from AH's lawyers to JD's lawyers from 30. 8. 2018 but which JD's lawyers didn't receive till 5. 9. 2018, in which AH wants a full release from the confidentiality agreement of the DPM (p. 158)
 - letter from AH's lawyers to NGN's lawyers regarding AH's release from 1. 11. 2018 (p. 159)
 - email from AH's lawyers to JD's lawyers regarding JD not responding to the letter from 30. 8., from 26. 9. 2018 (p. 162)
 - letter from Ms. Robinson to presumably JD's lawyers – it doesn't state so – regarding AH's release from 26. 11. 2018 (p. 164 – 165)
 - letter from NGN's lawyers to JD's lawyers regarding letter from 30. 8. 2018 that AH must be released from the terms of DPM from 19. 10. 2018 (p. 166)
 - letter from JD's lawyers to NGN's lawyers responding to demand that AH be released from the terms of the DPM from 26. 10. 2018 (p. 169)
 - letter from NGN's lawyers to JD's lawyers repeating the letter from 19. 10., from 5. 11. 2018 (p. 172)

- **22. 01. 2019 – Johnny Depp's 1st witness statement** ([JoDe 19-01-22 w1](#)); [listen](#) to it on Stevie J Raw's YT channel (15. 2. 2021) ✓
 - 8. ...the defence of Truth [by NGN] ... was pleaded on the basis of information in US court documents.
 - 10. In the subsequent [divorce] proceedings ... hardcopy photographs were put in evidence [by AH], but neither the original images nor the associated metadata were produced.
 - 16. [NGN] knew [that AH dismissed her request for TRO and that neither was a prevailing party] prior to publication [of the divorce agreement], because it reported it in an article on 17. August 2016... [this is article by The Sun from 17. 8. 2016 which I can't find]
 - 38. **Without any waiver of privilege, I have been advised that Ms Heard's actions have for years breached the confidentiality provisions of the Agreement.**
 - 44. Ms Heard's allegations were never tested in the California Court. ... much of that coverage was published prior to the Agreement and/or contained information which contradicted Ms Heard's position.
 - 50. refers to article *"I Was Petrified of the Monster": Johnny Depp, Amber Heard Legal Documents Shed New Light on Dual Abuse Accounts* by Ashley Cullins for [Hollywood Reporter](#) from 3. 1. 2019, 6:59.
 - exhibits are JCD1 (they are not in pdf)
 - declarations of officers Melissa Saenz and Tyler Hadden (p. 1 – 106)
 - declaration of Sean Bett (p. 107 – 108)
 - [declaration](#) of Jerry Judge (p. 109 – 111)
 - declaration of Isaac Baruch (p. 112 – 115)
 - deposition of Trinity Esparza (p. 116 – 206)
 - deposition of Cornelius Harrell (p. 207 – 251)
 - presumably stills from or a CD of cctv footage from the Eastern from 24. 5. 2016 [like [still1](#) or [still2](#)]
 - texts between Katherine Kendall and NGN (p. 252 – 257)
 - article that neither JD nor AH are a prevailing party in the divorce agreement, which NGN published before the agreement was made public, for The Sun from 17. 8. 2016 which I can't find (p. 258 – 263)
 - AH's public service [announcement](#) with #girlgaze referring to her allegations from 25. 11. 2016 (p. 264 – 265)
 - article *Amber Heard: I spoke up against sexual violence – and faced our culture's wrath. That has to change.* for the [Washington Post](#) from 18. 12. 2018 (p. 266 – 268)
 - *"I Was Petrified of the Monster": Johnny Depp, Amber Heard Legal Documents Shed New Light on Dual Abuse Accounts* by Ashley Cullins for [Hollywood Reporter](#) from 3. 1. 2019, 6:59 (p. 269 – 276)
 - the divorce agreement from 15./16. 8. 2016
- **27. 02. 2019 – NGN is refused the stay of the present action**

- **20. 06. 2019 – order for standard disclosure by exchange of lists**
- **21. 06. 2019 – NGN's amended defense**
 - a substantial number of incidents was added [do we know how many and which? this could give as an estimate for AH's manipulation of evidence/photos.]
- **26. 07. 2019 – JD's amended reply**
- **13. 09. 2019 – extended order for standard disclosure by exchange of lists**
 - JD's disclosure statement signed by Brown Rudnick, not by JD [which it should have been]
 - spreadsheet with about 400 text messages, plus 70.000 further messages, included as an "obvious mistake"
- **06. 11. 2019 – JD's supplemental disclosure**
- **25. 11. 2019 – JD's 1st requests for admission ?US**
 - 157 questions, one of which was about the donations based on no more than suspicion
- **04. 12. 2019 – Kristina Sexton's witness statement ([KrSe 10-12-04 w](#)); [listen](#) to it on Stevie J Raw's YT channel (17. 3. 2021) ✓**
 - 5. As Amber's acting coach, I would ... record her audition tapes... [so there are video tapes with her allegedly bruised face and body, then?]
 - 12....I overheard some serious fights while a waited for her to start her coaching session. ... This happened so many times, but I specifically remember it in relation to her audition tapes for the films *Bonnie and Clyde* (released in 2013) and *Christine* (released in 2016).
 - 23. – 28. JD's alcohol and drug issues [but they are hearsay from AH]
 - 29. JD in Hicksville: smoking marijuana, taking white powder (mdma or cocaine) and handing it around [to AH as well?, she cleverly never mentions AH and her use or not use of substances], eating magic mushrooms
 - 39. It was in this period, in early 2016, that we talked a lot about her leaving. [is it too preposterous to think AH was already planning on snatching marriage benefits?]
 - 58. JD's story of how he met AH and the shape of her ass on his couch when he first met her.
- **10. 12. 2019 – Louis Charalambous' 2nd witness statement (LoCh 19-12-10 w2)**
- **10. 12. 2019 – Edward White's 1st witness statement ([EdWh 19-12-01 w1](#)); [listen](#) to it on Stevie J Raw's YT channel (23. 6. 2021) ✓**
 - 1. .. [JD], who we have represented since 14 March 2016.
 - 5. I participated in a meeting with Mr Depp on the evening of 21 April 2016. ... The meeting began at 7.30 pm and lasted between 1.5 and 2 hours.
- **11. 12. 2019 – NGN obtained permission to adduce Ms. Inglessis' witness summary**

- **12. 12. 2019 – Isaac Baruch's 1st witness statement** ([IsBa 19-12-12 w1](#)); [listen](#) to it on Stevie J Raw's youtube channel (25. 6. 2021) ✓
 - 1. I am an artist and was invited by [JD] to live and work/paint in Penthouse 2... I lived in this unit for approximately 3 years and 7 months from March 2013 until November of 2016. I have known Mr Depp for almost 40 years.
 - 5. On May 21st, 2016, ... I arrived at the [Eastern] at **around 9:30 pm**, met a friend and we proceeded up to my apartment which is Penthouse 2... there was broken glass on the floor of the hallway from a broken sconce that hung on the wall ... there was a large puddle of split wine along with splashed wine running down the wall directly in front of the door [of PH1] [**hard at work with the hoax? were there ever any photos of broken glass in the hallway? possible wine stains on the LAPD bodycam footage which was filmed around 22:20! didn't include puddles and running wine, and they pass PH1 on their way to PH3**]
 - 7. On May 22nd, 2016, as I left my apartment a bit after noon time, ... [they were changing locks on PHs 1, 3 and 5, and AH had a private security guy][**Elon's?**]
 - 16. On Friday, June 3rd 2016, at around 11 pm late evening, I answered the knock on my door and it was Ms Heard. ... [that was when they spoke last]
 - 18. Within the first year in 2013 of living in the [ECB], Mr Depp one day knocked on my door to visit. ...
 - 19. He said, *"She likes to argue and she likes to hit."* ... *"No. She just wants to argue about stuff all the time and then she'll start hitting me. ... start punching me and wants to fight..."*
 - 20. I distinctly remember this occasion because it was the first time we ever had this type of talk with each other.
 - 21. Between March 2013 and May 2016, I've witnessed Mr Depp leave the Eastern residence **at least 4 times** to take refuge in his home in Hollywood...
- **12. 12. 2019 – Sean Bett's 1st witness statement** ([SeBe 19-12-12 w1](#)); [listen](#) to it on Stevie J Raw's YT channel (7. 6. 2021) ✓
 - 1. For the past 9 years, I have been working exclusively with [JD] and his family.
 - 6. A very common occurrence throughout the relationship would be that Mr Depp would have me, and other members of his security team, take him away from Ms Heard, due to her behaviour. ... This happened on so many occasions that it is not possible for me to remember them all in detail. ... I would describe it as a recurring cycle...
 - 7. Ms Heard often behaved in this way when she had been drinking.
 - 8. On April 21st, 2016,... **Later on in the evening**, I was called by Mr Depp and then I drove him home to another one of his properties.
 - 11. ...May 21st, 2016. ... [we] **arrived** at [the Eastern] **between 19:30 and 19:45**.
 - 12. **After approximately 10 minutes**, Mr Judge and I heard Ms Heard's shouts. ...we immediately entered the penthouse.
 - [photo](#) of JD's swollen bruise from 23. 3. 2015 (p. D76, exh. SB1) [**in his hearing on 15. 7. 2020, p. 1252, Mr. Bett stated that he did not take this exact photo but he did take a very similar photo on 22. 4. 2016, and this is a photo of a different incident from 23. 3. 2015, the Staircase incident**]

- **12. 12. 2019 – Johnny Depp's 2nd witness statement** ([JoDe 19-12-12 w2](#)); [listen](#) to it on Stevie J Raw's YT channel (11. 2. 2021) ✓
 - 7. The article relates to **my casting in *Fantastic Beasts: The Crimes of Grindelwald*, in which I was cast in around November 2016.**
 - 13. I first met Ms Heard when she auditioned for ... The Rum Diary...
 - 15. It was a few months after the start of our relationship that I started to recognize the lies. ... the slivers of fraudulence, the excuses for things and unexplained absences started.
 - 17. **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.**
 - 18c. ...although I was in recovery from drug addiction during significant part of my marriage to Amber, **instead of supporting my sobriety, she often encouraged me to drink alcohol and to take drugs...**
 - 20. **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 is an opioid prescription painkiller. ... 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 those drugs.
 - 23. ...at the premiere for The Rum Diary in late 2011, I was drinking. ... [a friend] then hooked me up at rehab for 3 days after the premiere.
 - 24. ...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 ... 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.
 - 25. **...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 mushroom, and would use a type of amphetamine similar to speed almost daily. At times, we took drugs together...**
 - 52. Ms Heard and I were in Australia in March 2015... There was a significant argument ... **on 8 March 2015 during which I sustained a severe injury...** [AH's] allegation that this happened on 3/4 March 2015 is inaccurate.
 - 56. 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.
 - 63. **...I believe I was taken to the hospital around 6:30 p.m. on March 8th, 2015.**
 - 67. I returned from Australia to Los Angeles in mid to late March 2015. Around the 22 March 2015, I was at Penthouse 5 with Ms Heard and her sister.

- 81. On April 21st, 2016,.. I know that I was about 1 hour and 40 minutes late ... because I was at the meeting with a recently hired business manager and his accountants.
- 85. On 12 May 2106, Ms Heard confessed to our estate manager, Kevin Murphy, that leaving the feces in the bed had been "*just a harmless prank*"... I resolved to divorce Ms Heard on that day. [22 April?]
- exhibits are JD2
- 86. I explained the incident to 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... and she started throwing fuckin' haymakers around again...*"
- 88. Prior to arriving to pick up my things on May 21st, 2016, I told Ms Heard on the phone that ... I was going to file for divorce. ... I do not remember the exact time we arrived at the [Eastern] but it was *a little after 8 pm*.
- 96. 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 [p.m.]. ... The time between the guards entering and leaving with me was less than 1 minute*. [if taken from camera 2 but which is 6 mins late]
- 99. [after being to PH5] *We then left the apartment just before 8.30 p.m.* [20:22]
- 104. [text to David Heard from 27. May 2015] *..."i have never been charged, nor arrested for domestic violence!!! SHE HAS!!! twice ... 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..."* [referring to her arrest for drunk driving when she was a minor in 2003 and her arrest for domestic violence in Seattle? or is there another domestic violence arrest we don't know about? her record goes like this: 9. 12. 2003 arrested for driving while [under the influence] and had her licence suspended (mug shot, docket screenshot)]
- [photo](#) of severed finger (p. D60) [I haven't seen a reference to the [x-ray](#) of JD's finger]
- [photo](#) of sedated JD in the hospital with a cigarette burn on the R cheek and wrapped finger (p. D61)
- [plan](#) of Eastern Columbia Building's condos (p. D62) [many [photos and a video](#) of the building and its penthouses are on deppdive; [3Dplan](#) from @ThatBrianFella]
- texts on 27. and 28. 5. 2016 from JD to Paige Heard, AH's mother ([17:43](#)), from JD to David Heard, AH's father ([19:45](#)), David Heard to JD (19:53), JD to David Heard (19:59), Paige to JD ([19:59](#), [20:03](#)), JD to Paige ([20:40](#)), Paige to JD (20:47, 20:54), JD to Chrisi Dembrowski, JD's sister (4:37) (p. D63-D66) – see [jpg1](#), [jpg2](#), [jpg3](#), [jpg4](#), [jpg5](#), [jpg6](#), [jpg7](#), [jpg8](#) on this [tumblr](#)
- **12. 12. 2019 – Stephen Deuters' 1st witness statement** ([StDe 19-12-12 w1](#)); [listen](#) to it on Stevie J Raw's YT channel (10. 3. 2021) ✓
 - 1. I have worked continuously for Mr Depp since June 2004. ... From 2004-2017, I probably accompanied Mr Depp on the majority of work trips.
 - 8. [24. 5. 2014 Boston flight] Mr Judge and I were able to see Mr Depp and Ms Heard throughout the flight as our seats were facing them.

- 17. [3. 2015 Australia] I believe we were at the hospital for a couple of hours before returning to the hotel.
- 18. The following day Mr Depp told me, Mr Judge and Mr Connolly that he has sustained his injury when Ms Heard had thrown a bottle at him which smashed on his hand. He also told us, and we were able to see, that Ms Heard had put a cigarette out on Mr Depp's cheek. However, ... we were instructed to say that Mr Depp had caught his finger in a door.
- 20. The first time Ms Heard ever made any allegation of physical abuse against Mr Depp was when she filed for a [TRO] in 2016...
- sketch of the airplane furniture and people arrangement linked to the Boston – LA incident (p. D112, exh. SD1)
- **12. 12. 2019 – Trinity Corrine Esparza's 1st witness statement** ([TrEs 19-12-12 w1](#)); [listen](#) to it on Stevie J Raw's YT channel (15. 3. 2021) ✓
 - 8. ...my regular working hours at that time were 8 p.m. to 4 p.m. between Monday and Friday.
 - 9. ...at approximately midnight of May 21, I received a call from one of my employees, Ms. Gaylynn Sumerlin, to inform me that the police responded to a call from the Penthouse at the [Eastern] Lofts. Ms. Sumerlin was on duty at the front desk at this time.
 - 16. On Friday, May 27, ... Amber Heard walked towards me with a sad look on her face. Now, for the first time that week, she had a red mark underneath her right eye. [this is probably the red mark we see in many bathroom photos in a white T-shirt. can we use this as a post quem date for the photos?]
 - 19. While reviewing the security footage, I came across a video that made me even more skeptical of Ms. Heard's allegations. A security video date- and time-stamped the evening of Tuesday, May 24, 2016 showed Amber Heard's sister, Whitney Heard, Rocky Pennington and Ms. Heard (wearing a trench coat), entering from the mezzanine garage entrance. ... As they waited for the elevator, Ms. Heard's sister Whitney threw a fake punch into the visibly unmarked face of Ms. Heard. Then they all threw their heads back in laughter. ... I also told them Mr. Depp left the [Eastern] Lofts May 21 at 8:29 pm (there is video footage of his departure with his two security guards), and has not returned since.
 - 20. ... video of ... Cornelius Harrell ... with Ms. Heard on Sunday, May 22, 2016 at 1 pm.
 - 23. Shortly after Ms. Heard obtained a restraining order against Mr. Depp, a huge plant was delivered ... a gift card ... "I had a wonderful weekend with you" ... signed "E" ... had fallen out of the huge plant.
 - 24. On June 9, 2016, Ms. Heard ... wanted help with certain media reports.
 - On that late June or early July morning, Elon Musk came down from the only elevator that goes to the penthouses and asked me to fob him to the garage. I was around 9:00 am in the morning and he looked like he had just woken up with messy hair. ... Mr. Romero said that he [Mr. Musk] had been visiting Ms. Heard late at night when Mr. Depp was away for more than a year at that point.

- 25. On the same day ... I could see a number of marks on Ms. Heard's body. She had **three small round bruises on the left hand side of her neck** and **two Band-Aids on her arm**. ... also had a **faint mark on her left cheek, below her eye**. That mark was approximately half an inch in length. [[photo](#) of her arm with Band-Aids appeared in *Amber Heard joins Tasya Van Ree for lunch... the ex girlfriend whose friendship so 'enraged' Johnny Depp* for [Daily Mail](#) from 13. 7. 2016, 2:57 GMT]
- **12. 12. 2019 – Whitney Henriquez's 1st witness statement** ([WhHe 19-12-12 w1](#)); [listen](#) to it on Stevie J Raw's YT channel (1. 3. 2021) ✓
 - 3. I first met Johnny Depp briefly during Amber's press tour for *The Rum Diary* in 2011, but I did not know that Amber and Johnny had started a relationship. ... When they officially started dating, I met him sometime after that in 2012... At the time, he said he was sober and was drinking a lot of tea and non-alcoholic Becks beer.
 - 4. I ... later lived with them in [the Eastern] for a period of time in 2014 to 2015.
 - 7. ...I heard them have a fight at ... about the dress ... to the Art of Elysium gala in 2014 ... that was less revealing. It was in this period that his stylist – Samantha McMillen – also became Amber's stylist. [[photo 1](#) and [photo 2](#) of AH's dress from [Getty Images](#); **AH's stylist before that was Johnny Wujek who also attended their engagement dinner in March 2014, as reported in *Stylist's faux pas at Depp's engagement do* for [SBS News](#) from 17. 4. 2014. the month is interesting, because the Art of Elysium galas are in January and Mr. Wujek was most likely still AH's stylist in March, or he probably wouldn't have been invited to the dinner.**]
 - 8. I was with them in Brazil in September 2015 when they had a huge fight because she and I were leaving early so she could do a screen test for *Aquaman*. [**was that around time of the slap mentioned in one of the audio tapes?**]
 - 11. ... on a camping trip in Hicksville in June 2013 and I had seen Johnny smoking marijuana and I understood that he was doing cocaine too because of the fact that his assistant, Nathan Holmes, had brought cocaine ... and I saw lines racked up in his trailer. [**but it was AH's trailer, too, wasn't it?**]
 - 15. ...after a fight they had in November 2014. ... Johnny was at his place at [Sweetzer] on the porch. He was supposed to be going to present and award at the Hollywood Film Awards that night, but he was refusing to go and he was drinking. ... His sister Christi kept coming out to tell him he had to leave, but he shooed her away. [**I wonder how bad AH belittled him and what else has she done that it went so bad JD didn't want to go to the presentation**]
 - 17. ... the got **engaged in September 2013**...
 - 20. Johnny would talk to me about their fights. It was striking how he had a completely different version of events to Amber. [**I don't think anyone is surprised anymore by this point**] ...he would claim ... that Amber had called him "*a fucking pussy*" or "*a little girl*"... but Amber would say "*that absolutely did not happen*".
 - 21. **The only way to calm it down was to separate them physically, but then he would start screaming "if she really cared she would be here" – and then he would start destroying things.** [**really now. really. and who is constantly complaining**]

about the other one splitting in the audio tapes? and not fighting? and not caring? JD? I don't think so. this is projection at its most obvious.]

- 22. He blamed her for it, saying things like, *"I just love her so much but this is what she does to me"...*
- 24. It was around this time [2015] that Johnny accused me of leaking and selling stories to the media about him and Amber to my friend, **Sara Kitnick**, who is **a journalist and was then writing for People magazine**. [is she AH's link at People? Ms. Henriquez in court corrected that Ms. kitnick was her link at E! News] ... there was a long period in 2015 when I was estranged from Amber and Johnny because of this. ... Johnny's people even tried to get me to sign a non-disclosure agreement about their relationship. ... I didn't sign the NDA and moved out...
- 27. [1. 2016] I went over to see Amber... I saw that she was emaciated and she told me that she had recently been suffering with shingles, anxiety attacks and heart problems. [ok, medical records, please]
- 33. Painting incident, 8 March 2013 [note there is only one day] I lived with Amber at the time. ... I was told on the call that he was supposed to be filming a documentary with Keith Richards at his house...
- 36. He was rambling about a friend of Amber's called Marie de Villepin... and that he knew all about her and her father. ... they had been photographed together in Paris. [see *Marie de Villepin > Johnny Depp?* by [Lainey](#) from 16. 1. 2013 18:13; or *Scooting all over town: Amber Heard and rumoured French Girlfriend Marie de Villepin enjoy a cinema date night in Paris... before riding off into the night on a scooter* by Louise Saunders for [Daily Mail](#) from 18. 1. 2013, 11:15 GMT. AH was also seen canoodling and neck-kissing with Ms. de Villepin in Milano on 15. 5. 2016, see *Amber and Marie 2016?* by [jambernews](#) from 22. 7. 20??; [original post](#) and [photo](#) from the same date at Giacomo Bistro, plus a [tweet](#) with [photo 1](#), [photo 2](#) and [photo 3](#) by Rubiks Glass.]
- 40. I sat with him in the kitchen for about four hours... His driver was outside waiting with his assistant Nathan. ... At some point, his sister Christ called on the phone to talk about how to get him out of the house and to the set. [except that he was sleeping upstairs, as AH's own texts testify]
- 41. ...hours and hours later, I convinced Johnny to leave.
- 42. We drove over together to [the studio]. ...he suddenly held Pistol out the window. [couldn't they at least agree on which dog? according to AH's 1st UK witness statement it was Boo.]
- 44. Amber went outside to talk to Christi. [at the studio]
- 46. I was sometime after this, but before we travelled to London in September 2013... [aha! this was when AH tried to 'grease a vet' to alter the dogs' health documents; see Kate James' 1st UK witness statement, par. 18 and [email](#) from 21. 9. 2013, 11:40 on p. D197 ([KaJa 20-06-05 w1](#))]
- 47. [5. 2014 Boston flight] I heard about it a couple of days later from **Amber and Savannah McMillan (Amber's friend)**, who had been on the plane with her, and discussed it with iO Tillet Wright, who was with Amber when she got back to LA. [why doesn't anyone else mention Savannah McMillan being on the plane?

perhaps she explains this in her 2nd UK witness statement which has not been made public.]

- 58. [3. 2015 Staircase] At this time, we were all living together in [the ECB]. I lived in PH4... My apartment was connected by a door to PH3 and was easily accessible to Johnny and Amber.
- 59. I went into PH5. ... Johnny ... was drinking whisky even though his sobriety nurse, Debbie Lloyd, was there with him. I walked down the stairs towards him.
- 61. Johnny was still on the ground floor with both of his security guards. He threw a Red Bull can at us [on the mezzanine level] and it hit ... Debbie.
- 62. He came up the stairs from the kitchen to the mezzanine level. I was on the top of the stairs in the mezzanine level and I stood with my back to the stairs, facing Amber but between them. [I remember from the Thanksgiving video that the stairs started just inside the door into PH5, not in the kitchen.] Johnny reached out to shove me out of the way to lunge at Amber – reaching out to try hit Amber – and instead struck me, hitting me in the arm. ... I was standing right there next to them when Johnny grabbed her by the hair with one hand and I saw him punch her really hard in the head with his other hand multiple times. [which one did he accomplish with a cast around his fingers, grabbing the hair or hitting hard multiple times and not be in pain?][you can see JD's wrapped hand in [photo 1](#) and [photo 2](#) of him leaving Brisbane airport on 11. 3. 2015 – also note the cigarette burn on the right cheek, or in *Injured Johnny Depp displays bandaged hand as he heads back to the US for surgery after mystery accident on set of Pirates Of The Caribbean* by Colette Fahy and Alicia Vrajlal for [Daily Mail](#) from 11. 3. 2015, 8:35 GMT; in this [photo](#) of a dinosaur cast following surgery in the doctor's office in LA from 18. 3. 2015, in [photo 1](#), [photo 2](#) and [photo 3](#) of him arriving at Brisbane airport before 20. 4. 2015; then the cast becomes smaller in this [photo](#) posted on 24. 5. 2015, this [photo](#) from 4. 6. 2015, this [photo](#) from 9. 7. 2015, this [photo](#) from 23. 7. 2015 in Bangkok, this [photo](#); then the cast seems to have come off on the [photo](#) for the Jack Sparrow performance at the Disney Expo on 15. 8. 2015, or [photo 1](#), [photo 2](#), [photo 3](#) and [photo 4](#) of the still wrapped tip of the finger at the Black Mass Premiere in Venice on 4. 9. 2015, or in the [photo](#) at the *Jimmy Kimmel Live!* from 10. 9. 2014, the wrappings seem to have come off in [photo 1](#) and [photo 2](#) from the Toronto Film Festival on 12. and 14. 9. 2015.]
- 68. [15. 12. 2015 Headbutt] ... There was blonde hair and blood stuck in the splinter on the bed frame. [well, sorry, it's not on any photo of the bedframe][I think AH's or Ms. Pennington's photo of the splintered bed frame is very interesting because it was clearly taken at the same time as Mr. Murphy's photo. perhaps it can be used as a reference for other photos taken by AH or Ms. Pennington at that time.]
- 70. I reached out to Amber ... and we reconciled a few weeks later, sometime in early January 2016 (sometime before the Art of Elysium charity event I was working on). [Art of Elysium Gala was on 9 January, and for the record, I think these are probably the loveliest photos of JD and AH together, see them on [Getty Images](#)]

- 73. [30. 4. 2016 Birthday] Johnny ... talked about the first time he had met Amber in his office and the shape her ass made on his couch...
- 74. I left soon afterwards because I was pregnant at the time...
- 75. I was in Amber's car with Amber, Rocky and Rami (another friend of Amber's)...
- 77. [21. 5. 2016 Divorce] Rocky called me on the night of 21 May 2016 and told me there was a really bad incident and that the police had been called. ... but Rocky and Amber told me not to come over...
- <https://www.youtube.com/watch?v=uivoJBviREI> is a link to a video of swaying JD presenting Hollywood Film Awards on 14. 11. 2014, posted by Extra Media (p. E118, exh. WH1)
- screenshots of texts with photos of alleged damage in PH5 taken by Ms. Henriquez and sent to Kevin Murphy on 23. 3. 2015 (6:57 text, 8:35 seven photos) (p. E119-E123, exh. WH1) [I like Mr. Murphy stoic reply: "Be down later. I'll call you." like he knew just what it's about (again).]
- [photo](#) looking down the stairs to upturned racks (p. E119)
- [photo](#) of a room with some standing and some upturned racks (p. E120)
- part of a [photo](#) of a hallways with clothes racks (p. E120)
- [photo](#) of upturned clothes racks (p. E121)
- part of a [photo](#) with upturned clothes racks (p. E121)
- [photo](#) of standing and upturned clothes racks (p. E122)
- [photo](#) looking down to a wooden table and kitchen appliances (p. E123)
- **12. 12. 2019 – Katherine Kendall's 1st witness statement** ([KaKe 19-12-12 w1](#)); [listen](#) to it on Stevie J Raw's YT channel (26. 5. 2021) ✓
 - "I told you [Zoe from The Sun] I have heard Amber had hit him [JD], which is why as you know I don't condone "any" violence. You have tried to use the #me too movement to your purposes by using me in this way." [does The Sun still have the recorded 'interview' Zoe took of Ms. Kendall?]
- **12. 12. 2019 – Ben King's 1st witness statement** ([BeKi 19-12-12 w1](#)); [listen](#) to it on Stevie J Raw's YT channel (8. 6. 2021) ✓
 - 1. I worked [for JD and AH] as their house manager in London for one month, in October 2014, and subsequently Australia for seven months, from February 2015 to August 2015, during Mr Depp's filming of Pirates of the Caribbean.
 - 6. During my employment ... I frequently witnessed Ms Heard goading and attempting to provoke Mr Depp. I never witnessed Mr Depp be violent or unkind towards Ms Heard, or indeed towards anyone else.
 - 12. During my employment with Mr Depp and Ms Heard in Australia, Ms Heard instructed me to take her and Mr Depp's dogs to a local groomer to be cared for over a weekend whilst they travelled. Over this weekend, the grooming staff posted a number of photographs of the dogs online. The publication of the dogs' presence in Australia alerted the authorities to the fact that Ms Heard had illegally smuggled the dogs into the country. In the immediate aftermath, Ms Heard complained about me to Mr Depp, who separately took me aside and told me that had done nothing wrong and not to worry about this. [[photo of the dogs at the groomer Happy Dogz](#) is in article *Depp's wife Amber Heard avoids Australia dog-*

smuggling conviction for [BBC News](#) from 18. 4. 2016, another [photo](#) is in article *'They are not above the law': Johnny Depp and Amber Heard prepare to flee Australia to avoid having their dogs put down* by Zoe Nauman and Erin Van der Meer & Lillian Radulova & Amy Croffey for [Daily Mail](#) from 14. 5. 2015, 14:07 GMT]

- **12. 12. 2019 – Samantha McMillen's 1st witness statement** ([SaMcM 19-12-12 w1](#)); [listen](#) to it on Stevie J Raw's YT channel (7. 4. 2021) ✓
 - 5. On December 16th, 2015, I spent much of the afternoon and early evening with Ms Heard...
 - 7. As I was leaving Ms Heard's company on December 16th, 2015, I overheard Ms Heard say to her friend Raquel Pennington... *"make sure to get those pictures onto my computer,"*...
- **12. 12. 2019 – Kevin Murphy's 1st witness statement** ([KeMu 19-12-12 w1](#)); [listen](#) to it on Stevie J Raw's YT channel (30. 4. 2021) ✓
 - 1. I was previously employed by [JD] for nearly eight years as an estate manager. ... I ceased working for Mr Depp in 2016.
 - 6. Throughout the course of my employment, I think I must have spent more time with Mr Depp and Ms Heard than any other member of their staff.
 - 10. [AH] becomes increasingly volatile when she drinks and when she drinks in combination with the amphetamine, Provigil, a drug which I understood she took regularly when I was employed by Mr Depp.
 - 11. ...at 1480 North Sweetzer Avenue in Los Angeles, just two minutes before I had arrived. Mr Depp told me that **Ms Heard had become enraged and threw a heavy television remote control at Mr Depp's face.** ... I could clearly see a round, swelled lump and laceration to Mr Depp's forehead... *[do we know at least approx. date for this incident? here is a [photo](#) of the cracked remote.]*
 - 14. I attended Mr Depp's penthouse ... on December 16th, 2015.
 - 15. **About an hour or so following this discussion**, Ms Heard ... showed me a tuft of hair she claimed Mr Depp had pulled out of her head the previous evening [in the upstairs bedroom of PH4]. I immediately took a photograph ... with my mobile phone. ... I also took a photo of the bed at the time...
 - 17. I left the Penthouse at around 6:30 pm [18:30]... ...I believe [Sean Bett] told me the next day that ... Ms Heard ... punched [JD] repeatedly in the face...
 - 19. I had sent pictures to Mr Bett and spoke with Mr Depp personally about the pictures around 24 hours later. ... I believe he **suggested getting the feces DNA tested...** *[oh? I wondered about that. did they?]*
 - 20. On May 12th, 2016, ... Ms Heard ... told me that leaving the feces in Mr Depp's bed had been *"just a harmless prank"*.
 - 21. **On May 21th, 2016, at 7.46 p.m.,** I received a telephone call from both Mr Depp and Ms Heard who were on speaker-phone together.
 - 22. At **approximately 8 or 8.15 p.m. on the same date**, I received a text from Mr Bett indicating that Mr Depp alone was going to call me shortly from Mr Bett's telephone. ... Mr Depp .. was sober, lucid and calm and seemed tired or sad. He did not appear to be angry.

- combined [photos](#) of a clump of hair taken by Mr. Murphy and of a different clump of hair with a pointing finger provided by AH (p. D91, exh. KM1)
- screenshot of a photo of a splintered wooden [bedframe](#) taken at an angle by Mr. Murphy on 16. 12. 2015 at 16:03 and sent to someone at 7:59/19:59; there is a photo gallery below the shot where a photo of the same clump of blond hair as above is visible (p. D92, exh. KM1) [[this photo gallery proves which two photos \(of the hair and of the bed, and he only took those two\) were taken by Mr. Murphy. the duvet on his photo looks dark blue, perhaps even black.](#)]
- a wider-shot [photo](#) of a splintered wooden bedframe taken from the front, with a folded pocket knife resting in the folds of the bedding where I don't see a body imprint, provided by AH (p. D93, exh. KM1) [[is this the photo where the bed was supposed to be unmade, as Mr. Murphy explains in his court hearing \(15. 7., p. 1192\)? cause I do see a very light gray duvet, with the folded knife; but the photo looks a bit too-exposed, so the original colour of the duvet was probably darker. the creases in the duvet and the splinters look the same, though, even the small ones. from his photo gallery above, it is clear that Mr. Murphy made two photos of the bed, one of the splinter from an angle and of the whole bed from the front, so this photo was made by someone else. but to me, they seem to be taken at roughly the same time, including the duvet, or at least when the bed was in the same state of disarray.](#)]
- **12. 12. 2019 – Alejandro Romero's witness statement** ([AlRo 19-12-12 w](#)); [listen](#) to it on Stevie J Raw's YT channel (12. 6. 2021) ✓
 - 6. I saw Ms Heard at the Eastern for the first time in around July 2015 but I understand that she was not resident at the Eastern until around March 2016. ... I do not know Ms Heard outside of my duties for the Eastern. [[ok, how did he then observe Mr. Musk visiting Ms. Heard in March 2015 as per par. 7? did they get the years wrong?](#)]
 - 7. [From March 2015 onwards, Ms Heard was visited regularly late at night, at around 11:00 pm to midnight, by Mr. Elon Musk.](#) ... I believe he visited Ms Heard a few times a week and he would always visit then Mr Depp was not at home.
 - 10. On Wednesday, May 25, 2016 I was working at the front desk of the Eastern during my regular working hours [4.00 p.m. to 1.00 a.m. Monday to Friday]. At approximatel 10.30 p.m. Ms Heard walked into the lobby accompanied by Ms Raquel Pennington.
 - 13. Between approximately 10.30 p.m. and 11.30 p.m., I searched Penthouse 1 and Penthouse 5, accompanied by Ms Heard and Ms Pennington. [[I don't get this AH's paranoia. did she try to accuse JD of sneaking around? she didn't know that he left USA on the early morning of the 22th?](#)]
- **12. 12. 2019 – iO Tillet Wright's witness statement** ([iO 19-12-12 w](#)); [listen](#) to it on Stevie J Raw's YT channel (4. 4. 2021) ✓
 - 3. I first met Amber in 2011...
 - 4. I met Johnny Depp through Amber in 2013. ... I lived in their family compound on --- from about August 2013 through about May 2014...

- 7. From October through December 2013, I spent a lot of time with Johnny while Amber was away working. ... Marilyn Manson was coming over a lot and I would see them doing load of cocaine. [hmm, very convenient that Mr. Manson can't now testify because he has his own allegations to battle through][also, according to Mr. Wright's tweets, he was in London in [Sep 2013](#) visiting AH, then in [Oct – Dec 2013](#) he was travelling in the USA/CA without AH or JD. JD filmed Mortdecai in London [Oct – Dec 2013](#), and was spotted back in LA around [Dec 23](#). how could iO habe been in two places at the same time, clAiming he spent a lot of time with JD?]
- 16. [24. 5. 2014 Boston flight] On the plane were Stephen Deuters, Jerry Judge, Savannah McMillan, and perhaps one or two others, along with Amber and Johnny.
- 22. In this period, Amber ... talked to my Dad and his wife Nicole, who were giving her advice and guidance about how to deal with being a wife of an addict...
- 24. [JD] basically begged her to come back ... and he was going to get sober and ... he had been sober on the set in Boston. [this was during filming of Black Mass] ... Amber that convinced her to take him back;... [does anyone else mention that they weren't together for some time in 2014?]
- 34. [15. 12. 2015 Headbutt] I was in Cincinnati filming a TV show.
- 38. When I arrived in LA, I went straight to the [Eastern] from the airport.
- 41. I saw a clump of hair on the floor. It looked to be blonde, long hair that looked like Amber's length and colour of hair. [well, clearly not on any of the photos. when was that, btw, before or after Mr. Murphy has been to PHs?]
- 55. [21. 4. 2016 Birthday] I was not at Amber's birthday party on 21 April 2016, but I was told about it the next day, when I met with Amber, Rocky, Whitney, and Melanie in Palm Springs... [where did they meet?]
- 57. [21. 5. 2016 Divorce] I was in New York at this time ... staying at my brother's house. I was walking home late that night when Amber and I got on the phone.
- 67. I hung up with Amber and made several calls and texts... I called 911. I contacted Rocky ... and told her to go over there right away. I called my friend Lauren Shapiro, who was in LA at the time and so could make a local emergency call, and asked her to call 911 and have police sent over to the [Eastern]... I was concerned the patch in from NYPD to LAPD would take too long. Lauren let me know she had called the police and they would be on their way.
- 68. [AH] said "*I know I know, I called my lawyer and she advised me not to*" [this is contrary to Mr. Drew's VA deposition from 19. 11. 2019, p. 69, where AH's lawyer said it was up to AH "as to what she wanted to do with the police"]
- article *Why I Called 911* from 8. 6. 2016, 16:00, published in [Entertainment News](#) (p. E140 – E146)
- [Mr. Wright [photographing](#) himself in JD's penthouse]
- 15. 12. 2019 – **Amber Heard's 1st witness statement** ([AmHe 19-12-15 w1](#)); [listen](#) to it on Stevie J Raw's YT channel (9. 2. 2021) ✓
 - 3. From 2011 to 2016, I was in a relationship with Johnny Depp. We were married in 2015 and the divorce was finalised in 2017.
 - 12. The next time I saw Johnny was **in 2011 on *The Rum Diary* press tour**. ... By this time, I had broken up with Tasya. Johnny told me that his relationship with Vanessa

Paradis [it's Paradis] was also over, but it wasn't public yet. Our romantic relationship then began.

- 13. After the press tour and sometime in **late 2011**, Johnny invited me to spend a weekend at the Trump SoHo in New York.
- 16. After that weekend I didn't hear much from Johnny for a while. Then I got a message from him while I was on vacation in Spain and Morocco in **early 2012**. He [invited me to] his private island in the Bahamas. [one of many [photos](#) of the island that float around the net]
- [*The Rum Diary* was released on 13 October, 2011 in LA, and on 28 October, 2011 in the USA. its press tour lasted till into November. for example, *Johnny Depp, Amber Heard Attend 'The Rum Diary' Premiere* by Rebecca Ford for The [Hollywood Reporter](#) from 14. 10. 2011, 17:26 PDT, or *Trying to lure an audience? As The Rum Diary threatens to become Johnny Depp's least successful movie, Amber Heard rocks a form-fitting dress for the UK premiere* by Holly Thomas for [Daily Mail](#) from 4. 11. 2011, 11:40 GMT, or *Johnny Depp's Bold Accessories On His 'Rum Diary' Press Tour* by Jessica Misener for [Huffpost](#) from 8. 11. 2011, 16:13 EST. **so far no rumour yet of them dating, although there is a [photo](#) where AH is reportedly wearing JD's T-shirt, and in the cross-examination in the UK JD said that they started seeing each other in late 2011. AH and Ms. van Ree started dating before or in 2008, when Ms. van Ree dissolved her previous partnership ([here](#)) and Ms. Heard petitioned to change her last name to van Ree on 3. 3. 2008, filed 7. 3. 2008 ([jpg1/jpg1](#), [jpg2/jpg2](#), [jpg3/jpg3](#)) and was granted the change on 24. 4. 2008 ([jpg/jpg/jpg](#)). they entered a domestic partnership in California in March 2008 ([here](#)). California started issuing same-sex marriage licenses on 16. 6. 2008 then halted then from 5. 11. 2008 till 27. 6. 2013 ([here](#)). AH and Ms. van Ree had a private ceremony in New York in 2011 when same-sex marriage was legalized there but they did not make it legally official. this is from *Amber Heard was 'married to former lover Tasya Van Ree' in secret wedding and even changed her last name* by Chelsea White for [Daily Mail](#) from 26. 5. 2016, 23:54 GMT and *Johnny Depp's wife Amber Heard was married to her ex-girlfriend* by Halina Watts for [The Mirror](#) from 29. 5. 2016, 21:54. **same-sex marriage was legalized in New York on 24 June, 2011** (see [here](#), [here](#) and [here](#)), and the Marriage Equality Law went into effect a month later, on 24 July, 2011 (see [here](#)). **when were they then 'married', in 2008 or in 2011?** interestingly, AH is also reported dating producer Arthur Wybrands from April to October 2009 ([here](#)). rumours of JD's and Ms. Paradis' split started in January 2012. for example, *Johnny Depp and Vanessa Paradis' Relationship In Trouble, Heading For A Split* by Alexis Tereszczuk for [Radar](#) from 6. 1. 2012, 16:00, JD attends the [Golden Globes](#) without Ms. Paradis on 15. 1. 2012, and *More Reports That Johnny Depp & Vanessa Paradis Split: We Told You First!* by Amber Goodhand for [Radar](#) from 18. 1. 2012, 12:00. **JD and Ms. Paradis officially announced their split in 19. 6. 2012**, for example *Johnny Depp & Vanessa Paradis Officially Split* by Sara Hammel for [People](#) from 19. 6. 2012, 13:30, *Johnny Depp & Vanessa Paradis: Anatomy of a Split* by Peter Gicas for [Eonline](#) from 19. 6. 2012, 21:25, *Johnny Depp: An Outlaw Looks at 50* by Brian Hiatt for [Rolling Stone](#) from 4. 7. 2013, and *'It wasn't easy on her, it***

wasn't easy on me': Johnny Depp breaks silence over split from Vanessa Paradis after 14 years by Amelia Proud for [Daily Mail](#) from 18. 6. 2013, 20:08 GMT. the earliest rumours of JD and AH together start in May/June. a [photo](#) of JD with a fan with possible David Heard in the background is from 14. 6. 2012, and *Johnny Depp, Amber Heard are '100% dating'* for [Digital Spy](#) from 28. 6. 2012 which also says: "Heard split with her photographer girlfriend Tasya van Ree earlier this month", but officially ended the partnership only in 2013". see also *Amber Heard Changed Last Name For Ex-Girlfriend* by [Radar](#) on 2. 6. 2016, 10:03 ET. this made me wonder about the 'ass on the couch' story JD has allegedly told on AH's birthday party in 2016. in 2009, JD and Ms. Paradis were still very much together. JD and AH became engaged before early 11. 2012, as per *Johnny Depp Head Over Heels For Amber Heard, Said He Loves Her* by [Radar](#) on 20. 11. 2012, 9:00 ET.]

- 17. [2012, Bahamas] He wasn't drinking, and I remember he had gotten really into tea.
- 18. For a year or so after that, I didn't see him drink...
- 19. Johnny had told me he had split from his ex-wife Vanessa Paradis at that time, but that wasn't public yet, and his kids didn't know [Ms. Paradis was not JD's wife, she was his romantic partner. at least get her last name right.]
- 20. I remember visiting him in New Mexico when he was filming the *Lone Ranger*. [The *Lone Ranger* was filmed between 13. 2. and ?. 7. 2012 in Albuquerque.]
- 44. – 51. [early 2013, Tattoo]
- 52. – 64. [March 2013, Painting]
- 52. ... I was living in my old house in LA.
- 54. He started arguing with me about the painting – I think it was in the evening – and it carried on over into the next day.
- 57. He was supposed to have been on set to film a Keith Richards documentary, but he wouldn't leave my house.
- 58. Sometime in the afternoon Johnny said something about my sister Whitney, so she came over to try to help...
- 60. While Whitney was talking to him, everyone was still at the studio waiting for him for the documentary.
- 61. He took Boo and held her out of the window of the moving car... [couldn't they at least agree on which dog? according to Ms. Henriquez' UK witness statement it was Pistol. and how interesting that AH herself posted a [video](#) of herself holding Pistol out the car's window, and someone caught her treating badly Bianca Butti's dog.]
- [analysis of incident 2 by Andy was posted by SEC in a series titled *Did Amber Make Evidence Fit The Narrative?*: [part 1](#) (16:08, 14. 2. 2022), [part 2](#) (19:45, 15. 2. 2022), [part 3](#) (14:18, 16. 2. 2022), and [part 4](#) (13:07, 17. 2. 2022), [part 5](#) (17:09, 18. 2. 2022), [part 6](#) (13:53, 21. 2. 2022), [part 7](#) (15:52, 22. 2. 2022). they were also streamed live by SEC, Stevie J Raw and Doctor Soup in [part 1](#) (*Exposing the Lies of Incident 2*, 7. 9. 2021, 1:30:03), [part 2](#) (*The Set Up*, 11. 9. 2021, 51:18) and [part 3](#) (*Robbed Blind*, 11. 9. 2021, 58:07) of *Exposing Ambers Lies* series.]
- 65. – 83. [24th May 2014, Boston Plane]

- 84. – 92. [August 2014]
- 93. [17th December 2014]
- 94. – 96. [January 2015, Tokyo]
- 94. Johnny had a premiere in Tokyo for a film he had done called Mortdecai.
- 97. – 98. [February 2015, Wedding]
- 98. I tried to smile through it and entertain our guests. But I had never felt more lonely in my life. [sure. and after two years of this horrible abuse you married him and even pushed for the wedding? give me a break.]
- 99. – 130. [March 2015, Australia]
- 103. Day one. ... He was very thin... [if you look at his rounded face at the time, it was probably the farthest from thin and lean that I can remember.]
- 116. Day two. Johnny's account of his severed finger is also untrue.
- 123. I had only seen that his finger had been cut off that morning when he held it up in my face.
- 130. Johnny didn't stay in the hospital in Australia long. He came back to the LA house after just one night.
- [a break-down of the incident was made by [Incredibly Average](#) in *Johnny Depp & Amber Heard Abuse Claims: Amber "just lost it" so Johnny Lost a Finger! New Evidence!!* (7. 4. 2020, 37:56) and the recording was also posted by [Incredibly Average](#) in *Johnny Depp & Amber Heard Abuse Claims: Australia's Bloody Aftermath!* (19. 4. 2020, 36:53, at 3:49 – 32:54)]
- 131. – 134. [March 2015, Staircase]
- 131. Soon after Johnny's return to LA, we got into a big argument one night...
- 132. I went to the penthouse next door, where my sister Whitney was staying... and she came into the apartment where Johnny and his team were. ... Johnny grabbed me by the hair with one hand and hit me repeatedly in the head with the other. [so, which one of these hands was in a cast from the operation?]
- 135. [August 2015, Train]
- 136. [November 2015, Thanksgiving] [[photo1](#) and [photo2](#) taken at that time]
- 137. – 147. [December 2015, Headbutt]
- 137. This happened on the night of 15 December 2015.
- 143. We [AH and Ms. Pennington] took photos of the splintered bed and the injuries..., plus a clump of hair on the carpet...
- 144. I [texted](#) my publicist Jodi Gottlieb just before midnight that night...
- [analysis of the photos titled *Manipulation of Photo Metadata – Incident-12* by Andy has been streamed live by SEC, Stevie J Raw, Come Geek Some, and Doctor Soup then uploaded by SEC in several installments: [part 1](#) (*Amber Heard Photos, Manipulation and Cover ups?*, 23. 11. 2021), [part 2](#) (*Does Amber Heard Have Flawed Metadata?*, 24. 11. 2021), [part 3](#) (*The Examination of Amber Heard Photo Metadata*, 28. 11. 2021), [part 4](#) (*Amber Heard – Metadata Doesn't Lie*, 1. 12. 2021), [part 5](#) (*When Did Amber Heard Take Photos of Injuries?*, 3. 12. 2021), [part 6](#) (*Investigation Into Amber Heard 'Hair Picture'*, 7. 12. 2021), [part 7](#) (*Amber Heard, Her "Evidence" Is Falling Apart*, 8. 12. 2021), [part 8](#) (*Did Amber Heard Use A Prop for Her Pictures*, 17. 12. 2021). further analysis by Andy titled *Johnny Depp v Amber*

Heard Corden Show Photo Analysis [part 1](#) (19:39) and [part 2](#) (13:06) was posted by Stevie J Raw (31. 1. & 1. 2. 2022)]

- 148. – 154. [April 2016, Birthday]
- 155. [21th May 2016, Divorce]
- 155. – 176. [JD] arrived at the apartment at **around 7.15 pm.**
- 162. [while JD was allegedly smashing PH5] Rocky took some pictures of the damage that Johnny had caused... Rocky also took pictures of the injuries caused to my face...
- 163. At some point **I called my new attorney Samantha Spector** to get her advice. [**I thought Ms. Pennington called her, as per Mr. Drew's UK [witness statement](#), par. 26.**]
- 168. Later that night ... two different police officers arrived. ... **by then we had cleaned up.**
- [analysis of four May 21st and 22nd photos, comparing background, eyebrows, clothing, hairstyle, jewelry, and bruising was made by Andy from London and posted by SEC as *Amber Heard Injury Photos Debunked* in [part 1](#) (14:29; 3. 2. 2022), [part 2](#) (14:45; 4. 2. 2022), [part 3](#) (12:29; 5. 2. 2022), [part 4](#) (12:32; 6. 2. 2022), [part 5](#) (16:03; 8. 2. 2022). it was also streamed as [part 1](#) (1:54:25) *New Bombshell Amber Heard Evidence analyses!* by Doctor Soup (2021) and [part 2](#) (4:03:21, with relevant parts with the document at 58:58 – 1:19:53 & 1:56:27 – 2:56:45) *The Andy Files! RIP Betty White. New Years Eve Live!* by Come Greek Some (31. 12. 2021). [timeline](#) (37:48) of texts for 21st May by SEC (24. 10. 2020).]
- (exh. AH1) (not in the pdf)
- **16. 12. 2019 – NGN's notice to rely on Ms. Marz' statement**
- **23. 12. 2019 – JD's supplemental disclosure**
- **30. 12. 2019 – AH's responses and objections to JD's first requests for admission** are on p. C533 – C558 of Joelle Rich's 6th UK witness statement from 2. 3. 2021 ([JoRi 21-03-02 w6](#)) ✓
 - AH paid for their own lawyers for Joshua Drew, Elizabeth Marz, iO Tillet Wright, Raquel Pennington, and Tasya Van Ree, plus paid for legal fees and expenses for Ellen Barkin (admissions 2 – 6, p. C534 – C535)
 - AH admits that she called JP "pussy" (admission 8, p. C535)
 - AH admits she may have used marijuana and illegal drugs once or twice during marriage, but JD used all constantly (admissions 9 – 10, p. C536)
 - **AH denies abusing alcohol during marriage, seeking treatment for illegal drug abuse, seeking treatment for alcohol abuse** (admissions 11 – 13, p. C536)
 - AH denies physically striking at least one other romantic partner (admission 15, p. C536)
 - AH 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 (admissions 16 – 18, p. C537)
 - AH admits that, while JD was threatening to assault her sister, she punched JD on one occasion in order to protect her sister, but denies punching JD on more than one occasion (admissions 20 – 21, p. C537)

- AH denies she kicked JD on more than one occasion (admission 23, p. C537)
- AH admits that on one occasion, when she was cornered by JD and trying to escape an ongoing violent assault, she had to throw a can of paint thinner in JD's direction (admission 26, p. C538)
- AH admits that ... when JD would violently assault her, she had to throw objects in JD's direction..., but denies that those objects included burning candles [apart from heavy bottles, soda cans, television remotes, and paint thinner cans] (admission 27, p. C538)
- AH **denies that she threw a bottle at JD that hit and severed part of his finger**, and also denied that she confessed to a third party soon after throwing the bottle ... that she "were so angry you just lost it" (admissions 29 – 30, p. C538 – C539)
- all subsequent requests/admissions were not answered; donations are no. 38, no. 47 says **AH was diagnosed with borderline personality disorder**, nos. 54 – 66 are infidelities (Elon Musk in 3. 2015, James Franco before 21. 5. 2016), nos. 133 – 139 says that AH never sought any medical treatment for any injuries , physical or psychological assault claimed to be caused by JD, no. 155 says that **she and other individuals and organizations are paying her legal expenses**
- **2019 – Melanie Inglessis' declaration** ?29. 5.? ([MeIn 19-??-?? dc](#)); [listen](#) to it on Stevie J Raw's YT channel (21. 4. 2021) ✓
 - 8. [15 December 2015] Ms. Inglessis noticed "a split lip and a bruise near her eye ... there was a chunk of hair missing from her head"
 - 10. Adir Abergel – Amber's hair stylist – was working on Amber's hair while I did Amber's makeup. Adir and I both discussed how we had noticed that Amber was missing a chunk of hair. [**why don't we have his testimony also?**]
 - [photo](#) of writing in gold marker on a kitchen countertop (exh. 1) not in pdf
 - [messages from 2019 between Ms. Inglessis and ?: [text1](#), [text2](#), [text3](#), [text4](#). before and after [photos](#) of AH's face after Ms. Inglessis photoshopped it (**for James Corden show?**) plus [tweet1](#) and [tweet2](#) of Ms. Inglessis arguing about these or similar photos.]
- **09. 01. 2020 – JD's signs N265 disclosure statement**
- **13. 01. 2020 – JD's supplemental disclosure**
- **24. 01. 2020 – JD's supplemental disclosure**
- **29. 01. 2020 – JD's supplemental disclosure**
 - screenshot of the 'disco bloodbath' [text](#)
- **30. 01. 2020 – JD's supplemental disclosure**
- **03. 02. 2020 – JD's supplemental disclosure**
- **11. 02. 2020 – notice of JD changing his solicitors to Schillings LLP**
- **12. 02. 2020 – Joshua Drew's witness statement** ([JoDr 20-02-12 w](#)); [listen](#) to it on Stevie J Raw's YT channel (5. 4. 2021) ✓
 - 5. I first met Amber in June 2014. I met Johnny sometime soon after that.
 - 14. [Dec 15 2015] I went with [Mr Pennington to PH3]...

- 15. Rocky ... sent me home... About 10-15 minutes later I received a message from Rocky...
- 18. I was with Rocky when she took the pictures of Amber's injuries.
- 22. [May 21 2016] Rocky received a text message ... at 8.06pm and she bolted...
- 25. About five minutes later [after he was told what happened], [JD's] security officer, Jerry Judge, called my mobile and told me his boss had left his cell phone...
- 26. Rocky called Amber's lawyer Samantha Spector to ask her what we should do. We were told to make a contemporaneous note of what had happened. We went back into their apartment and took pictures of the damage. Amber also called her publicist, Jodi Gottlieb.
- 27. Later, I greeted the police officers who arrived about 15 minutes later and showed them around the apartments. [doesn't say which] ... large wine stain in the hallway ... wine bottle dent in the door of PH1 ... tour of PH5
- 29. After this we cleaned up some of the broken glass in PH3 that was on the kitchen floor... Other things, like piles of books strewn about, we left as it was.
- 30. I greeted the second set of officers who arrived... I took them for a walk through the apartment and they spoke with Amber in private. [which is total bs as their bodycams proved. he didn't walk them around anywhere and they didn't take AH anywhere private, they didn't even go very close to her.]
- Joshua Drew's confidential deposition as part of the VA trial, with exhibits – for exhibits see that deposition, from 19. 11. 2019 (p. E171 – E295)
- 12. 02. 2020 – JD changed solicitors from Brown Rudnick to Schillings
- 13. 02. 2020 – NGN's draft re-amended defence
 - another incident was added and details of others were changed [do we know which incident?]
- 14. 02. 2020 – NGN's supplemental disclosure
- 19. 02. 2020 – Louis Charalambous 3rd witness statement (LoCh 20-02-19 w3) is attachment 1 of the 2nd notification of adjudicated facts, p. 6 – 32 of pdf ([AdjuFacts2](#)) ✓
 - email from Mr. Waldman to Mr. Charalambous regarding AH's 'evidence' from 5. 2. 2020 (p. 9, par. 11) – Waldman says there are more tapes to come
 - text from JD to AH from 9. 9. 2013, 11:03 (p. 8, par. 29)
 - text from Paul Bettany to JD from 4. 6. 2013, 14:45 (p. 8, par. 29)
 - [texts](#) from JD to Paul Bettany and back, the 'Let's burn Amber!', from 11. 6. 2013, 17:04, 18:23 (p. 8, par. 29)
 - text from JD to Paul Bettany incl. drinking, powders, pills, from 30. 5. 2014, 17:45 (p. 9, par. 29)
 - text from JD to Christi Dembrowski from 18. 1. 2016, 16:51 (p. 9, par. 29)
 - table of texts that were not in N265 original form spreadsheet: to Whitney Heard on 21. 5. 2016 at 19:30, [text](#) to AH about 'disco bloodbath' from 12. 3. 2013, texts between Mr. Deuters to AH from the flight, to AH from the flight, Mr. Deuters to AH on 25. 5. 2014, to AH from the flight (p. 15 – 17, par. 34) [the texts between Mr. Deuters and AH after the Boston plane incident were published in *Amber Heard's Texts From 2014 Detail Alleged Assault by Johnny Depp: 'He's Done This Many Times'* by Jackie Willis for [etonline](#) from 1. 6. 2016, 13:15 PDT: [text1](#), [text2](#), [text3](#),

[text4](#) and also in *Amber Heard's Texts from 2014 Allegedly Show History of Assaults by Johnny Depp* by Michael Miller for [People](#) from 1. 6. 2017, 19:00]

- three notes from AH to dr. Kipper about JD's condition while detoxing in the Bahamas from 20. 8. 2014 (p. 16, par. 55) [*notes come from AH*]
- note from AH to dr. Kipper from 24. 6. 2014 (p. 16, par. 55)
- exhibits are LC3 (not in pdf)
- article '*I can't promise I won't get physical again, I get so mad I lose it.*' Listen as Amber Heard admits to 'hitting' ex-husband Johnny Depp and pelting him with pots, pans and vases in explosive audio confession by Ben Ashford for [Daily Mail](#) where one of the tapes has been leaked, from 31. 1. 2020, 19:25 GMT (p. 2 – 22)
- article '*See how many people believe you.*' Listen as Amber Heard scoffs at Johnny Depp for claiming he's a domestic violence victim, suggesting court would take her side because she's a slender woman in explosive audio by Ben Ashford for [Daily Mail](#) with another recording from 5. 2. 2020, 19:35 GMT (p. 23 – 52)
- form N265 or disclosure statement signed by JD from 9. 1. 2020 (p. 53 – 58)
- original JD's N265 form (p. 59 – 63) – **contained c. 70.000 texts (many not relevant or privileged and therefore deleted, but c. 800 inadvertently disclosed; this is where Mr. Bettany's [text](#) exchange comes from)**
- emails between JD and Michael Mann from 8. – 9. 6. 2016 and emails between JD and Rob Marshall from 21. 6. 2016 (p. 64 – 68)
- AH's exhibit list with texts etc. from 9. 8. 2016 (p. 69 – 73)
- texts from AH's list from the Bahamas in 2014, from 9. 8. 2016 (p. 74 – 87)
- protective order from US (p. 81 – 94)
- email from Mr. Drew to AH from 22. 5. 2016 (p. 102 – 105)
- article from The Blast containing a link to Laura Divenere's declaration from 15. 7. 2019 (p. 105 – 106) [couldn't find the article from The Blast but found one from [Daily Mail](#) from 17. 7. 2020, 17:20 GMT]
- extracts from Lisa Beane's medical notes, dr. Kipper's office manager, from 15. 12. 2015 (p. 106 – 107)
- [text](#) from Mr. Waldman to Laura Divenere regarding her deposition (p. 108)
- Laura Divenere's VA [declaration](#) (p. 109 – 111)
- letters between SM&B and Brown Rudnick, JD's lawyers, some specified below (p. 114 – 204)
- letter from SM&B to Brown Rudnick regarding JD's medical records from 4. 10. 2019 (p. 117 – 122)
- Brown Rudnick's response about inadvertently disclosed texts from 10. 10. 2019 (p. 132 – 135)
- Brown Rudnick investigating the texts from 17. 10. 2019 (p. 139 – 140)
- Brown Rudnick's explanation for the texts from 6. 11. 2019 (p. 148 – 149)
- SM&B requiring confirmation about the texts from 25. 11. 2019 (p. 152 – 153)
- docs regarding the release of US's deposition transcripts (p. 154 – 156 + 164 – 166)
- Brown Rudnick: JD's position about texts is the same as in is 2nd witness statement, from 23. 12. 2019 (p. 164 – 166)
- letter from Brown Rudnick to SM&B from 13. 1. 2020 (p. 170 – 171)

- **19. 02. 2020 – NGN's application notice**
- **19. 02. 2020 – Amber Heard's 2nd witness statement** ([AmHe 20-02-19 w2](#)); [listen](#) to it on Stevie J Raw's YT channel (13. 2. 2021) ✓
 - this is all confidential
- **19. 02. 2020 – NGN's notice to rely on Ms. Marz' statement**
- **20. 02. 2020 – JD's supplemental disclosure**
- **21. 02. 2020 – Jenny Campbell Afia's 1th witness statement** (JeAf 20-02-21 w1) ✓
 - Mr. Waldman received two audio recordings on 27th January 2020 [these are the recordings disputed in Mr. Charalambous 3rd witness statement from 19. 2. 2020 and the approved judgement on the disclosure of certain categories of documents from 6. 3. 2020; the '*I can't promise I won't get physical again, I get so mad I lose it.*' ([part 1](#) (1:05:07) and [part 2](#) (59:35)), unofficial transcript [part 1](#) and [part 2](#)), and the '*See how many people believe you.*' ([full phone call](#) (31:06), [transcript](#)) recordings.] and did not possess them prior to that.
 - Mr Waldman received only those two recordings, not others.
 - **The first recording, if not both, was made by Ms Heard.** [in fact, the first was consensual recording, possibly on AH's phone, the second was recorded by JD]
 - JD does not hold and has never held any of these recordings.
 - letter from Schillings' to SBM from 20. 2. 2020 (exh.)
- **21. 02. 2020 – Hilda Vargas' 1st witness statement** ([HiVa 20-02-21 w1](#)); [listen](#) to it on Stevie J Raw's YT channel (22. 4. 2021) ✓
 - 1. I work for [JD] as a housekeeper and have done so **for more than 30 years**. In the period from 1988 until May 2016, I typically worked in the mornings in Mr Depp's home in West Hollywood on Sweetzer Avenue and then in the afternoons in Mr Depp's home downtown on Broadway [the ECB].
 - 6. On 22 April 2016, I arrived at Mr Depp's home at the Eastern **at approximately 3 pm**. ... I began to clean unit 3... I began to clean downstairs with another cleaning woman.
 - 7. I pulled back the top sheet on the [master] bed and aw a large pile of faeces. ... It was clear to me that this was human faeces. ... I have cleaned up after those dogs many times and their faeces are much smaller. Further, I have never known those dogs to defecate in the bed. [**that's interesting, especially as AH and iO both claim it was the dogs.**]
 - 8. With my cell phone, I took pictures...
 - 10. Shortly after this incident, I stopped going to Mr Depp's home at the Eastern. I was uncomfortable around Ms Heard. I now work primarily at Mr Depp's West Hollywood home. [**that would explain why AH didn't know the name of the new cleaning lady in May.**]
 - 11. On Tuesday, 24 May 2016, I was working at Mr Depp's West Hollywood home when Ms Heard came over with her friend MS Raquel Pennington. I was surprised because I had not seen Ms Heard at the West Hollywood home in several weeks.
 - 12. ...I wanted to end the conversation as quickly as possible. I have often heard MS Heard yell at Mr Depp and at other people. ... On the contrary, in over 30

years I have worked for Mr Depp, I have never seen Mr Depp be physical with or yell at anyone.

- screenshot of [photo](#) of faeces on blue bedding, taken 22. 4. 2016 at 18:54 (p. D160, exh. HV1)
- screenshot of [photo](#) of faeces on blue bedding, with a guitar in the background, taken 22. 4. 2016 at 18:54 and sent at 8:48/20:48 (p. D161, exh. HV1)
- [photo](#) of faeces on blue bedding (p. D162, exh. HV1)
- **25. 02. 2020 – Malcolm Connolly's witness statement** ([MaCo 20-02-25 w](#)); [listen](#) to it on Stevie J Raw's YT channel (23. 3. 2021) ✓
 - 1. I have worked for ... Johnny and his family for the past 16 years.
 - 5. I was working for Johnny in Australia in March 2015 at the time of this incident, and I can say that Amber's account of when we had to take him to hospital to treat his finger injury on 8 March 2015 bears no resemblance to my recollection.
 - 6. At the time I was staying in an apartment block called Peppers in Broad Beach. Most of the crew and security were all stationed there.
 - 7. I remember at some point **in the middle of the afternoon on 8 March 2015** getting an urgent call from Jerry Judge... He told me to get out to the property urgently, with Andrew, the driver. "Malcolm, get in the car, extract the Boss from the situation."
 - 8. The property was just off the highway, with a long drive. Outside patrolling the grounds, for security reasons, there is always an RST [Resident Security Team] with two four-wheel vehicles and four guys.
 - 9. I **got to the door at around 1.30/2pm...**
 - 11. ...when we were outside Johnny said to me words to the effect of "Look at my finger. She's cut my fucking finger off. She's smashed my hand with a vodka bottle." O saw his finger and it was a mess. He also told us that she had put a cigarette out on his cheek. I could see the mark on his face. **[the cigarette burn was visible for at least a month and a half. it appears on the [photo](#) of JD in the emergency room in the Gold Coast Hospital in Australia, on 8. 3. 2015. is it still there in the [photo](#) when they return to Australia on 20. 4. 2015, and in [photo1](#) and [photo2](#) when JD and AH were caught shopping in Brisbane on 24. 4. 2015.]**
 - 12. Amber appeared at the door and then came close to the car, screaming ... "Are you just going to leave it like this, you fucking coward?" ... She was absolutely hysterical. ... I was worried that she might start throwing objects at Johnny (or at myself), as I had seen her throw objects before. ... I had seen her lob a **fork** in Johnny's general direction once; another time I recall she threw a **lighter** at him; another time a **can of coke**.
 - 14. I would estimate that I was there for around 25 minutes in total.
 - 15. We then took Johnny to my apartment at around 2pm... Fortunately one of my guys, Trevor, was there...
 - 17. Debbie, Dr. Kipper's nurse... I called, got her to my apartment (it took her about three minutes from when I called her) and she started the triage on Johnny's finger.

- 18. When dr. Kipper arrived, probably **about 30 minutes after Johnny and I had got there**, he said ... we needed to take Johnny to hospital. Jerry and I then took Johnny to hospital with Dr. Kipper and nurse Debbie. It must have been **around 4.30/5 o'clock**.
- 19. We went with the onion cover story. The specialist didn't believe us for one second.
- 20. Johnny didn't go back to the house over the next few days.
- [an [interview](#) (14:39) with Mr. Connolly about his work as a security and more specifically for Mr. Depp, was made by Alicia Keen and posted on YT on 23. 8. 2020]
- **25. 02. 2020 – Johnny Depp's 3rd witness statement ([JoDe 20-02-25 w3](#)); [listen](#) to it on Stevie J Raw's YT channel (15. 2. 2021) ✓**
 - 4. In her witness statement dated 15 December 2019, Amber makes a number of new allegations which I wish to respond to.
 - 6. In the tapes of my conversations with Amber that have now been disclosed,... The hours of recording reveal the true nature and dynamic of our relationship, including Amber's confessions of serial violence against me,...
 - 9. [3. 2013 Painting] This was especially true given that Amber had, up to that point, complained to me that her ex had been violent to her and had stolen most of her possessions, while Amber continued to pay her ex's rent. [**that's interesting, exactly the same as AH did to JD later on.**]
 - 11. I do remember at one point being late to film the documentary ... because she and I were arguing ... about a trip to Spain that Amber had taken to meet an ex-partner. She had denied that she used to be in a relationship with him... [**do we know who?**]
 - 21. ...on **another private flight in late 2014 or early 2015**, Amber and I were the only passengers on a flight I chartered. Amber became verbally aggressive... Then she became physically violent and repeatedly punched me in the face. ...she followed me into the plane's bedroom and punched me again in the face and the head. [**any more info on this? pictures? is this the flight to Japan on 24./25. 1. 2015?**]
 - 22. ...to reduce my very advanced dependency on – prescription painkillers, which I had begun taking years earlier after a film stunt injury.
 - 23. [3. 2015 Australia] Amber severed my finger with the second of two thrown vodka bottles at me **in the early afternoon of Sunday March 8**.
 - 24. Friday March 6, as I recall, was a filming day. I came back to the house after work and my recollection is that our chef Russell prepared dinner for Amber and me.
 - 25. I do not recall anything out of the ordinary occurring on Saturday March 7, 2015. ... I had been sober for quite a long time at that point. ... I broke my sobriety the following day (Sunday, March 8) by drinking vodka after a sustained period of verbal abuse and endless aggression from Amber...
 - 27. The reality is that I was whisked away by Malcolm from the house, after Ben King retrieved my severed finger from the bar area, on the **afternoon of Sunday March 8**. ... we then drove to the hospital and there are records of our arrival that

afternoon. ... The hospital [discharge letter](#) ... records my **entry to the Emergency Department at 16.20 on March 8.**

- 28. It is important to remember that my 24 hour a day security guards were right outside the property during this incident the whole weekend, and Amber knew that. [umm, that is not exactly as Mr. Connolly recollects. he says Mr. Jerry was away when he called him and Mr. Connolly drove to the house. there were, however, four RST security guys outside the house.]
- 36. – 37. Ms. Wright [at the time] manipulating JD's daughter for a project. [[photo](#) of JD supporting Mr. Wright's project *We Are You* on Ellen DeGeneres show and another [photo](#), [photo](#) of Mr. Wright with Lily-Rose, and Mr. Wright's [tweet](#)/[tweet](#) from 22. 8. 2015. Lily's defense of her labeling was published in *Lily-Rose Depp Speaks Out About Sexuality: I Don't Think You Have to 'Label Yourself'* by Lindsay Kimble for [People](#) from 3. 2. 2016, 15:50. I didn't find Lily's photo or her story on [Self Evident Truth](#)'s website.]
- [photo](#) of AH with one of the dogs in Australia (p. D185.1) [from the landscape]
- [photo](#) of AH with one of the dogs going through a door (p. D185.2)
- [photo](#) of both dogs in a dog carrier (p. D185.3)
- [photo](#) of AH with one of the dogs (p. D185.4) [interestingly, she has red blush on her right cheek, and it looks just like an alleged bruise]
- [photo](#) of one of the dogs inside a home (p. D185.5)
- **25. 02. 2020 – Travis McGivern's witness statement** ([TrMcG 20-02-25 w](#)); [listen](#) to it on Stevie J Raw's YT channel (16. 6. 2021) ✓
 - 1. I have worked as a security guard for [JD] for almost 7 years from March, 2013 onwards.
 - On **March 23 2015**, I was working a security shift at [the ECB], where Mr Depp was also staying at the time. At some time **between 4 and to 6 am**, Mr Depp contacted me and asked me to come to Penthouse 5... He also asked me to bring a nurse who works for Mr Depp called Debbie Lloyd. ... When [we] entered the residence, Ms Heard and Mr Depp were having a verbal argument. Ms Heard's sister was also present. ... This **argument lasted approximately 60 to 90 minutes.**
 - 6. When I arrived at Penthouse 5... At some point **approximately 30 to 45 minutes after my arrival**, Ms Heard threw a full can of Red Bull that hit Mr Depp in his back.
 - 7. Ms Heard was standing on the landing above Mr Depp and I witnesses her spit on Mr Depp from above.
 - 8. Ms Heard also tried to throw a purse at Mr Depp, but I deflected it mid-air. **Approximately 10 minutes before we left**, I witnessed Ms Heard punch Mr Depp in the eye with a closed fist.
 - 9. Ms Heard and Ms Henriquez then left Penthouse 5. ... We then went to the vehicle with Mr Depp.
- **25. 02. 2020 – JD's draft re-amended reply** as cited in the UK judgement from 2. 11. 2020, par. 45 – 74 ([UK-J](#))
 - 8d. [JD] texted Whitney Heard on 21 May 2016 at 7.30pm in response to a text he received from her at 7.15 suggesting **his arrival may have been later than 7.15pm.**

- **26. 02. 2020 – pre-trial review hearing's** p. 1 – 3 + 108 – 111 are in JD's opposition to AH's supplemental plea in bar from 28. 6. 2021, p. 38 – 39 of pdf ([JD-OppPleaBar](#)) ✓
 - [Ms. Heard] is not under any duties of disclosure... (p. 108)
 - Ms. Heard has given us some documents, she has given us some documents. But she does not claim to have given us all of them. (p. 109)
- **26. 02. 2020 – Amber Heard's 3rd witness statement** ([AmHe 20-02-26 w3](#)) is also on p. 30 – 37 of pdf in JD's opposition to AH's supplemental plea in bar from 28. 6. 2021 ([JD-OppPleaBar](#)); [listen](#) to it on Stevie J Raw's YT channel (17. 2. 2021) ✓
 - 4. I remained financially independent from him the whole time we were together and the entire amount of my divorce settlement was donated to charity. [please note that she wrote in past tense and that the witness statement is dated 26th February 2020. also, I would like to know who payed for the flight the dogs took from Australia, who payed her sentence in Australia, who payed the bills in LA (this I now know was JD), who payed for her car and its maintenance (JD), who payed for her wine (apparently JD, per the Rolling Stones interview), and plenty other things.]
 - 4. It is not true that I told him I admired his films early in our relationship. I was always very clear with him that I hadn't seen his movies... [in an interview for The Rum Diary posted by [SheKnows](#) on 28. 10. 2011 she says she is a fan of JD [can one be a fan without knowing his films?]]
 - 6. I am not a habitual drug user. ... I am not a personality that likes to be out of control. I did not take cocaine at all when I was with Johnny. [the video/podcast between Steven Crowley and Jason Philip where Mr. Crowley talks about how AH took some of her co-actors to her drug dealer and how they couldn't leave the premises has been taken down from youtube. two other podcasts from Mr. Crowley and Mr. Philip with other interesting information on AH are [conversation](#) from 3. 12. 2020 and [conversation](#) from 10. 12. 2020]
 - 8. I do like to drink wine, but I don't like to get drunk. ... I was not drunk on any of the occasions that I talk about in my last statement.
 - 11. I would sometimes take photographs of damage Johnny caused or take recordings on my phone to be able to show him... [and the worst she could come up with was the 'kitchen cupboards video?]
 - video recording of JD smashing kitchen cupboards, 2016, recorded in secret by AH (exh. AH3) (not in the pdf) [that would have to be before 30. 4. 2016, then] [a [low quality edited version](#) (1:37) was leaked by AH? to [TMZ](#) and published in *Johnny Depp goes off on Amber ... smashes wine glass, bottle* from 12. 8. 2016, 19:28 PT. another [edited low quality version](#) (1:30) was published in 'Cut me wherever you want, or I will': Court is played terrifying recording of Johnny Depp begging Amber Heard to slice him with his wife by Jack Wright for [Daily Mail](#) from 10. 7. 2020, 16:40 GMT. the [full version](#) (2:10) was shown by JD's legal team in UK closing submissions on 28. 07. 2020, p. 2546–2550 and posted on YT by [Incredibly Average](#) (14. 8. 2020, 2:08, transcribed), [Arbuckling](#) (14. 8. 2020, 3:09, with a bit of background information), and [Amber Turd](#) (14. 8. 2020, 2:04).]

- [video clip](#) (3:09) of The Late Late Show with James Corden from 16. 12. 2015 (exh. AH3) [other photos and stills from the Corden show: [group photo](#) w/ James Corden, Luke Bracey and Wanda Sykes, [still 1](#), [still 2](#), [still 3](#), [still 4](#), [still 5](#), [still 6](#)]
- **26. 02. 2020 – pre-trial conference**
- **06. 03. 2020 – Vanessa Paradis' witness statement** ([VaPa 20-03-06 w](#)); [listen](#) to it on Stevie J Raw's YT channel (5. 5. 2021) ✓
 - 5. I have known Johnny for more than 25 years. We've been parents for 14 years and we raised our two children together. Through all these years I've known Johnny to be a kind, attentive, generous, and non-violent person and father.
 - [Ms. Paradis' statement is very similar to the [letter](#) she wrote on 27. 5. 2016]
- **06. 03. 2020 – approved judgement on the disclosure of certain categories of documents** ([DisclosureDecis](#)) ✓
 - 6. The principal substantive defence ... was pleaded in the **original defence of July 2018**, although the number of incidents of violence on which the Defendants relied was then much fewer. ... **The Amended Defence was filed ... on 21st June 2019. This added substantially to the number of incidents... The draft Re-Amended Defence of 13th February 2020 adds a further alleged incident and amends the detail of some of the others.** [do we know the number and which incidents were in the original defence and which were added later? that could give us an estimate for the manipulation of AH's evidence/photos.]
 - 19. Mr Charalambous says that the reference to an audio tape recording was to a tape which had been provided to the US publisher of *Mail Online* and which had formed the basis for an article on its website on 31st January 2020... [article '*I can't promise I won't get physical again, I get so mad I lose it.*' Listen as Amber Heard admits to 'hitting' ex-husband Johnny Depp and pelting him with pots, pans and vases in explosive audio confession by Ben Ashford for [Daily Mail](#) where one of the tapes has been leaked from 31. 1. 2020, 19:25 GMT]. According to the article, the recording was of a 'two hour therapy session recorded consensually on Heard's phone.'
 - 20. The same day that Mr Charalambous was emailed by Mr Waldman (5th February 2020) a second article appeared in *Mail Online*... ['See how many people believe you.' Listen as Amber Heard scoffs at Johnny Depp for claiming he's a domestic violence victim, suggesting court would take her side because she's a slender woman in explosive audio by Ben Ashford for [Daily Mail](#) from 5. 2. 2020, 19:35 GMT].
 - 23. [NGN] submits that there are more tapes to come.
- **06. 03. 2020 – disclose order** is on p. 151 – 154 of pdf in AH's VA memorandum to compel JD's production of original devices and operating system drives and cloud backups as requested in her 14th, 15th and 16th RFPs ([AH-MemoJDsDevices-Attachs](#)) ✓
 - 1. ...the Claimant do by 4pm on 10th March 2020 provide a witness statement verified with a statement of truth from him personally listing all of the recordings

[including the voice of Amber Heard] within his control that fall within the scope of CPR 31.6.

- [the same is ordered for the documents from the VA and Divorce proceedings, and medical records or their redaction]
- **06. 03. 2020 – NGN's re-amended defense** as cited in the UK judgement from 2. 11. 2020, par. 45 – 74 ([UK-J](#))
 - The Claimant and Ms Heard began living together **in or about 2012** and married on 3 February 2015. They separated in or around 22 May 2016.
- **10. 03. 2020 – JD's application for extension of time to make disclosure**
- **10. 03. 2020 – the unless order granting JD extension till 13. 3. 2020**
- **10. 03. 2020 – Jenny Campbell Afia's 2nd witness statement** (JeAf 20-03-10 w2)'s p. 1, 4, 5, 11 are on p. 155 – 158 of pdf in AH's VA memorandum to compel JD's production of original devices and operating system drives and cloud backups as requested in her 14th, 15th and 16th RFPs ([AH-MemoJDsDevices-Attachs](#)) ✓
 - 16. We are currently in the process of listening to all of the audio and video files which have been extracted from the Claimant's devices that were supplied to our firm by the Claimant's previous solicitors. ... **The resulting files included numerous voicemails left on the Claimant's mobile phones and many videos. There were in excess of 50 such files. Of the 50 files so far reviewed, none of the documents fall to be disclosed. In addition to those files, our team extracted more than fifteen and a half hours of audio recordings that include the voice of Ms Heard**, which a senior lawyer has started to review in order to apply the tests for disclosure pursuant to CPR 31.6.
 - 17. We are also endeavouring to contact the company who 'mirrored' the relevant devices of the Claimant in order to ascertain that we have a complete file. [**so, there already exists a mirror of JD's devices**]
- **12. 03. 2020 – Johnny Depp's 4th witness statement** (JoDe 20-03-12 w4) is p. 159 – 161 of pdf in AH's VA memorandum to compel JD's production of original devices and operating system drives and cloud backups as requested in her 14th, 15th and 16th RFPs ([AH-MemoJDsDevices-Attachs](#)) ✓
 - 4. ... I instructed Schillings to carry out on my behalf the necessary search of all audio and video files that were previously extracted by my legal representatives, Brown Rudnick, from the devices and storage accounts under my control. For the avoidance of doubt, I confirm that **I provided to Brown Rudnick full access to all of those devices and storage accounts.**
 - 7. a. **An audio recording with the filename 20150326 040115.m4a, recorded on 26. March 2015 at 11:01:16pm (UTC+0).**
 - 7. b. **An audio recording with the filename 20160103 183858.m4a, recorded on 4 January 2016 at 2:38:58pm (UTC+0).**
- **13. 03. 2020 – JD's supplemental disclosure**
- **14. 03. 2020 – JD's supplemental disclosure**
- **16. 03. 2020 – Wynona Rider's witness statement** ([WyRi 20-03-16 w](#)); [listen](#) to it on Stevie J Raw's YT channel (5. 5. 2021) ✓

- 6. I knew Johnny very well years ago. We were together as a couple for four years... I count our relationship as one of the more significant relationships of my life.
- 7. The idea that he is an incredibly violent person is the farthest thing from the Johnny I knew and loved. ... He has never been violent or abusive towards anyone I have seen.
- **18. 03. 2020 – judgement regarding NGN's application for disclosure of certain medical records**
- **19. 03. 2020 – Amber Heard's 4th witness statement** ([AmHe 20-03-19 w4](#)); [listen](#) to it on Stevie J Raw's YT channel (19. 2. 2021) ✓
- **20. 03. 2020 – unreserved judgement regarding trial date change to July 2020**

- **08. 04. 2020 – hearing & unreserved judgement granting [NGN's?] application that parts of the trial should be in private**

- **11. 05. 2020 – Starling Jenkins' witness statement** ([StJe 20-05-11 w](#)); [listen](#) to it on Stevie J Raw's YT channel (10. 6. 2021) ✓
 - 1. I have worked for [JD] personally since 1993...
 - 5. ...from the draft declaration I provided for use in the US proceedings...
 - 7. In the many years I have worked for Johnny, I have never seen him use physical force on Amber on any way...
 - 9. I was working a security shift at the [Eastern] on the night of 21 April 2016... When I left the residence, Johnny had not yet arrived.
 - 10. I returned to the residence the following day, 22 April to escort Amber and her friends to the desert for the Coachella music festival.
 - 12. When I entered the residence, Amber explained to me that she had thrown Johnny's cell phone – and the wallet containing it – off the balcony the night before...
 - 14. These friends [going to Coachella] were Raquel Pennington, Amber's sister Whitney, Amber's assistant Savannah, and Amber's make-up artist. I believe Amber's friend iO Tillet drove separately.
- **11. 05. 2020 – Tara Roberts' witness statement** ([TaRo 20-05-11 w](#)); [listen](#) to it on Stevie J Raw's YT channel (4. 4. 2021) ✓
 - 1. I have worked [for JD] as his Estate Manager on his Bahamian island property since December 2008.
 - 7. I never saw Johnny, who is an unusually kind man, be violent or aggressive with Amber or anyone else. I observed in December 2015 to my colleagues that Amber was a "thrower", someone who threw projectiles. I also witnessed Amber lunge violently at Johnny, pull his hair, and commit other aggressive physical acts against him as well as the visible aftermath of the incidents outlined in this statement.
 - 9. Johnny, Amber and Debbie Lloyd ... arrived on the island on 8 August 2014 and Johnny left later that year. There was nothing out of the ordinary that happened during this visit.
 - 10. During the evening of 29 December 2015 Johnny drove to the office alone... Shortly after, amber showed up to the office.

- 11. – 14. describe AH's verbal and physical abuse, incl. throwing a quart sized can of lacquer thinner at JD's face which left "a red, swelling gash on the bridge of his nose". The next morning, bushes around the house were filled with art supplies that had been thrown.
- 19. During this visit in Christmas 2015 Amber had a photographer on the island to conduct a photo shoot. We did not know this was happening nor did Johnny's children. ... the photographer, Greg Williams, arrived on 27 December 2015 with his partner, took photographs the day after Amber's rampage [30. 12. 2015], during departure, of an uninjured Amber, and of Johnny, who had a visible gash on the bridge of his nose. [the whole series of photographs can be viewed on Mr. Williams' [Instagram](#) and [Facebook](#) pages, lots are on [deppdive](#), three are on [byebyeblackbird](#) tumblr. photographs were taken for Temperley London. [photo 1](#), [photo 2](#), [photo 3](#), [photo 4](#), [photo 5](#), [photo 6](#), [photo 7](#), [photo 8](#), [photo 9](#), [photo 10](#), [photo 11](#), [photo 12](#), [photo 13](#), [photo 14](#), [photo 15](#), [photo 16](#), [photo 17](#), [photo 18](#), [photo 19](#), [photo 20](#), [photo 21](#). interestingly, Mr. Williams was also took photos of JD and AH in 13. 10. 2015 ([photo](#)) and 13. 1. 2016 ([photo](#)). this series of photos may have been first published in *Amber Heard Scheidung: Beweise diese Photos Johnny Depp...* for [Bild](#) from 13. 5. 2021, translation of which was streamed by [Come Geek Some](#) (18. 5. 2021)]
- 20. Also present ... were Johnny's son, daughter and his daughter's friend. Johnny's children did witness the aftermath of the events of 29 December...
- 21. When Amber ... left the Island on 31 December 2015, she took everything she owned with her. [[setting the plan in motion, huh.](#)]
- **12. 05. 2020 – JD's notice for Ms. Beane's and Ms. Summerlyn's statements**
- **13. 05. 2020 – pre-trial review regarding a strike-out application of a very long statement prepared by Kate James**
 - JD wished to rely on the evidence of David Killacky and a further statement by Kate James
- **18. 05. 2020 – judgement regarding the strike-out application**
 - David Killacky's evidence was dismissed in entirety
 - Kate James' statement was allowed in part
 - 27xiv. Ms. Heard sending abusive texts to Ms. James and being cross when Ms. James sent her an SMS message, this is irrelevant or disproportionate and my not be adduced by the claimant.
- **2020 – Johnny Depp's 5th witness statement (JoDe 20-?? ?? w5)**
- **05. 06. 2020 – Kate James' 1st witness statement ([KaJa 20-06-05 w1](#)); [listen](#) to it on Stevie J Raw's YT channel (27. 4. 2021) ✓**
 - 1. I worked for Amber Heard from around March 2012 until February 2015.
 - 6. Amber was already dating Johnny when I started working for her. At first, Amber didn't tell me who Johnny was, and would speak in disparaging terms about him. She would say that she was "*dating this old man*" and suchlike.
 - 7. During my time working for her, Amber would drink vast quantities of red wine each night. Meanwhile, she would ask me to buy Johnny non-alcoholic beer, as

that's all that she would allow him to drink. [eg., *Johnny Depp Reveals He Has Been Sober For 1.5 Years, But Claims He Was Never An alcoholic And Just 'Self Medicated'* by [Radar](#) from 19. 6. 2013, 14:23 ET]

- 9. I never saw any physical violence by either Amber or Johnny. I saw Amber ... almost every day for three years apart from when she was out of town. ... I never once say any bruising, swelling, or any evidence of what could have resulted from violence.
- 12. [about the [letter](#) to Homeland Security] ... Amber was therefore willfully lying to the US immigration department. I took a photograph of the letter and one of the pay checks from Amber to Savannah.
- 13. – 18. dogs smuggling incident
- 16. I remember the huge uproar at the time. **I was told that Johnny had to send the dogs back to Los Angeles on a private jet, which would cost a fortune from Australia.** [and I'm sure AH didn't pay that cost] Ultimately, I woke up one morning many months later to find an email from my mother with an attachment of a newspaper article from my home town of Brisbane. I was devastated when I found out that **Amber had blamed me in court.** I broke down in tears at the thought that **she blatantly lied in court** in my home town and blamed me. Obviously I knew that was a complete lie and yet **she had no problem in apparently perjuring herself in order to avoid responsibility.** [anyone managed to find that newspaper article from Brisbane online?]
- 18. I recall a previous occasion in September 2013 when I was asked [by AH] to speak with Kevin Murphy about amending the dogs' medical records so that they could **travel** together on **25 September 2013**. Amber asked if I knew a vet she could "grease".
- 19. Amber fired me on 16 February 2015, pretty much right after she got back from their wedding in the Bahamas. She blindsided me.
- [cheque](#) from Amber Vanree for Savannah McMillian from 9. 5. 2014 for \$1625 (p. D195)
- [letter](#) from AH to Department of Homeland Security regarding Savannah McMillan being her friend on a tourist visa and not an employee, from 20. 9. 2014 (p. D196)
- [email](#) from AH asking Kate to help her procure from Kevin Murphy a slightly altered health document about the dogs' shots recorded as two days before, from 21. 9. 2013, 11:40 (p. D197) [they were going to London]
- **10. 06. 2020 – Joelle Rich's 3rd witness statement** (JoRi 20-06-10 w3)
 - clip from televised interview to the Dutch broadcaster RTL where AH announced that she has donated the full divorce settlement, from 18. 10. 2018 (exh. 3) [the [full clip](#) (4:38) was posted by RTL Talkshow on 19. 10. 2018]
- **12. 06. 2020 – AH provided 'the extraction report'** refering to JD's iCloud from which it transpires that JD had the tape recording with 'I hit you I didn't punch you' contested in 29. 6. 2016 hearing and that it was in his possession at least on 18. 2. 2020 when it was disclosed to AH in VA
- **15./16. 06. 2020 – order regarding costs of NGN's application for disclosure**

- **16. 06. 2020 – Raquel Rose Pennington witness statement** ([RaPe 20-06-16 w](#)); [listen](#) to it on Stevie J Raw's YT channel (11. 3. 2021) ✓
 - 1. I have been a friend of Amber Heard since 2003...
 - 11. [8. 3. 2015 Australia] [AH] still has scars on her arms from this incident.
 - 20. [15. 12. 2015 Headutt] I ... called ... a private nurse... I then took photographs with my phone of her injuries. ... face ... of the apartment.
 - 21. I photographed a big clump of hair on the floor which was blonde in colour...
 - 23. Samantha was styling her [AH], Melanie was doing her makeup, and Adir was doing her hair.
 - 24. [21. 4. 2016 Birthday] We had a small gathering planned, including a dinner at 8pm pn the patio of PH5 for about 12 guests. **Guests started to arrive from about 8pm... After about an hour, we decided to start dinner without [JD].**
 - 25. Johnny arrived sometime after we had finished dinner. A number of guests were still there... Eventually guests began to leave, and I returned to my apartment.
 - 30. At no time did I see any faeces in the bed... iO was not even in LA at that time...
 - 32. [21. 5. 2016 Divorce] Amber sent me a text at 8.06pm asking me to come over... right away.
 - 33. [JD] then backed up into the kitchen, saying "*the DNA test will prove it, we will find out who did this*". [**did they do the DNA testing?**]
 - 43. In the hallway there were puddles of spilled wine on the floor and splashed on the walls, and a dent in the [door] of my apartment.
 - 45. We took pictures of Amber's face ... and ... of the property damage...
 - 46. At some point we returned to PH3 to wait for the police. [**given that the police arrived at 20h30, they accomplished all of this in about 15min. and they locked themselves into PH1, not PH3, which is where Mr. Drew came out of when the police arrived.**] ... Nothing had been cleared up in the apartment.
 - Raquel Pennington's statement from 22. 5. 2016 (p. 19 – 20, exh. RRP2) not in pdf
- **22. 06. 2020 – Kevin Murphy's 2nd witness statement** ([KeMu 20-06-22 w2](#)); [listen](#) to it on Stevie J Raw's YT channel (2. 5. 2021) ✓
 - **8. Ms Heard had brought the dogs into the Bahamas without paperwork and vaccinations in another instance in July 2014 and in knowledge of the risks doing so.**
 - 9. At no time did I discuss this matter with Mr Depp because he never wanted the dogs to travel on any occasion as he felt they would have better care in Los Angeles with staff.
 - 10. Upon getting to work the morning following Mr Depp and Ms Heard's departure for Australia I was shocked to learn that Ms Heard had taken the dogs despite our discussions and my warnings...
 - 12. On **October 13 2015** I signed a declaration for the Australian proceedings... This declaration was prepared by Ms Heard's US lawyer in this matter.
 - 17. ...on June 23, 2016, I retained the services of the law firm ... in order to seek advice on retracting my declaration in the Australian proceedings.

- 18. This effort was completely independent of Mr Depp and I personally incurred all of the legal costs.
- 20. In August 2016 I resigned from my position with Mr Depp. ... [and] it was no longer financially feasible for me to continue pursuing this matter.
- ending statement for services with All-Pet Travel for the dogs for Australia from 9. 4. 2015 (p. D237.10)
- letter from Debbie Rogers of All-Pet Travel regarding the dogs from 16. 6. 2020 (p. D237.11)
- screenshots of texts between Mr. Murphy and AH regarding dogs' travel (travel at end of Apr with 10 day quarantine, delivery to house around 7th May), cargo flying, costs, from 29. – 31. 3. 2015 (p. D237.12-17)
- photo of Boo in the Bahamas, taken there without paperwork and vaccinations by AH, from 7. 6. 2014 (p. D237.18)
- screenshot of texts between Mr. Murphy and Stephen Deuters about AH knowing about dogs from 20. – 21. 4. 2015 (p. D237-19)
- screenshot of texts between Mr. Murphy and Christi Dembrowski regarding dogs from 20. 4. 2015, 17:24 (p. D237.20)
- statement from Mr. Murphy regarding household dog policy from 13. 10. 2015 (p. D237.21-22)
- letter confirming that law firm Grant B. Gelberg represented Mr. Murphy in 2016 in connection with JD and AH's criminal case in Australia, representation ended in Aug 2016, from 22. 6. 2020 (p. D237.23)
- screenshots of article *Amber Heard mocks Pistol and Boo dog smuggling scandal in Instagram pics* for [news.com.au](https://www.news.com.au) from 12. 4. 2018, 6:24, where these [photos](#) are posted; screenshots from 8:40 (p. D237.24-26)
- screenshots of Kate James' email about AH's departure on 6. 4. with various replies, from 20. 4. 2014, 20:59 (p. D237.27-28)
- screenshot of Savannah McMillan's text to Toni about shipping, from 21. 4. 2015 (p. D237.30)
- screenshot of Savannah McMillan's text to Toni about shipping boxes from a hotel in London, from 10. 4. 2015 (p. D237.31)
- screenshot of AH's text to Mr. Murphy thanking him for shipping medication, from 28. 3. 2015 (p. D237.32)
- screenshot of Mr. Murphy's text to Savannah McMillan regarding a small box for AH, to which Ms. McMillan replies they are in Denmark till 2nd and to send it to London production office for The Danish Girl, from 28. 3. 2015 (p. D237.33)
- screenshot of Savannah McMillan's text to Trudy, from 21. 2. 2015 (p. D237.34)
- screenshot of Savannah McMillan's text to Kate James, Mr. Murphy, AH about suitcases arriving to London, from 5. 2. 2015 (p. D237.35)
- screenshot of Savannah McMillan's text to Mr. Murphy thanking him for the wonderful food and other things for thanksgiving, from 3. 12. 2014 (p. D237.36)
- screenshot of Savannah McMillan's text to Mr. Murphy and Ms. Dembrowski where she introduces herself as AH's assistant, from 17. 3. 2016 (p. D237.37)
- **23. 06. 2020 – Jenny Campbell Afia's 6th witness statement (JeAf 20-06-23 w6)**

- 25. 06. 2020 – NGN's application for a declaration that the claim was struck out because JD's alleged failure to comply with unless order
- 25. 06. 2020 – hearing
- 25. 06. 2020 – approved judgement is on p. 5 – 14 of pdf in AH's notice of judicial notification of UK court rulings impacting this matter from 9. 7. 2020 ([pdf](#))
 - regarding "Australian drug texts"
- 26. 06. 2020 – Amber Heard's 5th witness statement ([AmHe 20-06-26 w5](#)); [listen](#) to it on Stevie J Raw's YT channel (19. 2. 2021)
 - 5. [Daily Mail Recording 1, published on 1 February 2020 – there is no article about this on that date in Daily Mail archive] This recording is from 26 September 2015 (TB/ File 4 Tab 154) and it was recorded consensually... Johnny and I regularly recorded our conversations during our relationships. [I don't believe that for JD's side. such a private person wouldn't want that, unless it was for a certain purpose. or AH bullied him into it.] ...recording conversations started as part of our relationship therapy... [that is much more believable. but it has happened a lot earlier than AH claims.]
 - 9. [Daily Mail Recording 2, published 6 February 2020] This recording is of a telephone call which took place after I had issued divorce proceedings (TB/ File 4 Tab 155). I think the date of the call was around late May 2016. I did not know he was recording and I did not give him permission. [see how it feels?][*'See how many people believe you.'* Listen as Amber Heard scoffs at Johnny Depp for claiming he's a domestic violence victim, suggesting court would take her side because she's a slender woman in explosive audio by Ben Ashford for [Daily Mail](#) from 5. 2. 2020, 19:35 GMT]
 - 26. [Aug 2014, Bahamas detox] I refer to further details on this incident in the Confidential Schedule to this statement. [this is the first time AH brought up sexual violence allegations. interestingly, it happened after Malcolm Connolly's [witness statement](#), Travis McGivern's [witness statement](#) and Tara Robert's [witness statement](#) where they each said they witnessed AH attacking JD.]
 - 47. I had scheduled [volunteer work at CHLA] for 4 days a week at times...
 - 48. The London Fields shoot started in around September 2013.
 - 49. Savannah travelled for a few days to the US with me in November 2013 and then returned to the UK. Savannah then came to the US in late March 2014 and stayed with me whilst I was working on a film in New York.
 - 54. On one occasion when I arrived in the US with Savannah, Savannah was detained by Homeland Security for approximately 7 hours. ... she asked me to write a [letter](#) confirming she did not work for me in the U.S. Savannah drafted the letter. [hmm]
 - 55. In 2015 we had two dogs, Pistol and Boo. I bought Pistol in around 2007-8. Johnny bought Boo in around 2012, originally for his mother.
 - 56. On 21 April 2015 Johnny chartered a private plane to Australia...
 - 57. Johnny wanted Pistol and Boo to come to Australia, and knew they were on the plane with us.

- 59. In about May 2015 the Australian authorities were made aware that we had imported the dogs after a posting on social media. I was charged in relation to their importation.
- 60. Johnny arranged for his personal lawyers in the US, Marty Singer, to deal with the case against me. Marty Singer then engaged Australian lawyers who dealt with the case. It was those lawyers who arranged witness statements... **Johnny paid all the legal bills.**
- 63. This matter has already been litigated to conclusion in Australia ... me giving security by recognizance in the one thousand dollars...
- 70. I was given a nurse as well, Erin Boeurum...
- 74. ...my own nurse Erin... **[was she Johnny's nurse or AH's nurse? who was paying her?]**
- 79. reference to article with Tasya's statement from 8. 6. 2016 [*Amber Heard's Ex-Girlfriend Tasya van Ree Speaks Out Following Domestic Abuse Allegations* by Lily Harrison for [Eonline](#) from 8. 6. 2016, 21:57]
- 87. reference to article from The Blast from 15. 7. 2019... I asked her [Laura Divenere] if I could record the conversation and she said yes. The recording and a transcript are both in the Trial bundle (TB/ File 9 Tab 142). [*Amber Heard's 'Friend' Goes on the Record: 'I Never Saw Amber Injured in Any Way' at the Hands of Johnny Depp* by Mike Walters for [The Blast](#) from 15. 7. 2019, 17:06]
- 71. I referred to Johnny's attack on me on the train in that diary entry. ... must have taken place on 26/27 July 2015, not August 2015 as I say in my statement. **[caught][but on a [photo](#) with the train staff, JD is the one with bruises on his face and around his eye, [zoom-in](#)]**
- **[sometimes I wonder if anything she wrote in her witness statements is true.]**
- texts between dr. Cowan and dr. Kipper regarding a plane flight from 1. 2015 (not in pdf) **[perhaps related to the private plane punches in late 2014/early 2015]**
- photos of alleged scabbing on AH's lip (not in pdf)
- text from AH to Kate James regarding Tasya's painting from 10. 3. 2012 (not in pdf)
- text from AH to Kate James regarding the Boston flight from 24. 5. 2014 (not in pdf)
- text from Kate James to AH from 8. 12. 2014 (not in pdf)
- email from AH to Kate James regarding AH's schedule from 5. 11. 2014 (not in pdf)
- AH's affidavit, prosecution and defense submissions, judge's order from 18. 4. 2016, transcript of judge's sentencing remarks, all related to dogs' smuggling (not in pdf)
- texts between JD's lawyers and AH regarding perjury in Australia from 11. 10. 2015 (not in pdf)
- text from JD to nurse Boerum complaining that they are not calming AH and taking her pressure away from him from after the divorce (not in pdf)
- [text](#) from nurse Boerum to AH from 16. 12. 2015 (not in pdf)
- text from AH to Lisa Beane from 30. 5. 2016 (not in pdf)
- text from nurse Boerum to AH from 13. 9. 2015 (not in pdf)
- [text](#) from AH to dr. Cowan from 12. 2015 (not in pdf)
- email from Tasya van Ree to AH from 28. 12. 2018 (not in pdf)

- **26. 06. 2020 – draft judgement**
- **27. 06. 2020 – Jenny Campbell Afia's 7th witness statement** (JeAf 20-06-27 w7)
- **28. 06. 2020 – Louis Charalambous 7th witness statement** (LoCh 20-06-28 w7)
- **28. 06. 2020 – Jenny Campbell Afia's 8th witness statement** (JeAf 20-06-28 w8) is on p. 12 – 17 of pdf in AH's motion to compel & memorandum production of documents and responses to AH's 1st, 2nd, 4th and 5th RFPs from 18. 11. 2020 ([AH-Memo1+2+4+5RFPs](#))
✓
 - 6. [recording Argument 2] ...[JD's] US lawyers disclosed the tape in their libel proceedings on 20 February 2020 (Depp Production 009), on the basis that it had just been discovered.
 - 7. ...the page of the Extraction Report which shows the file name of the recording as "Argument 2" / "20150926163469.m4a" and a reference to "Source: iPhoneRecordings", referred to and exhibited at page 42 of Mr Charalambous' Exhibit LC7, was reviewed as a standalone document on the US e-Discovery platform.
 - 8. The tag at the bottom of the platform reads "DEPP00008169", which is a single page document.
 - 9. On further review... it was not correct to say that it was not in the Claimant's possession.
 - 11. I understand that at the time of the Claimant's extraction of his devices, the data was disclosed in the US libel proceedings in quite a crude "data dump". ... It was not until early this year that it was discovered and disclosed in both... proceedings.
 - 17. There has been no attempt by the Claimant to prevent the Defendants obtaining documents by Ms Heard, even if the provision of those documents is apparently in breach of US procedural law.
 - JD's N265 disclosure statement from 9. 1. 2020 (p. 1 – 6) (not in pdf)
 - letter from Schillings to NGN's solicitors from 28. 6. 2020 (p. 7 – 8) (not in pdf)
- **29. 06. 2020 – part proceedings** are attachment 2 in AH's 2nd notification of adjudicated facts from 7. 7. 2021, p. 34 – 71 of pdf ([AdjuFact2](#)) ✓
 - interesting note on p. 14 (47 of pdf) where Ms. Shereborne says that NGN has "started with only defending two allegations they have now expanded those to justify 14 allegations."
 - discussion about Mr. Murphy's 2nd [witness statement](#) regarding Australian dog smuggling (p. 49 – 56 of pdf)
 - talk about a tape transcript with several highly damaging allegations where AH admits to physically abusing JD (p. 56 of pdf) – a reference to a tape "I was hitting you" [[part 1](#) (1:05:07) and [part 2](#) (59:35), transcript [part 1](#) and [part 2](#)]
 - [did anyone else get a giggle when Mr. Chew was transcribed as Mr. Choo?]
 - judgement from 29. 6. 2020 (p. 73 – of pdf)
 - reference to the original and complete recording made on 22. 7. 2016 when AH and JD met in or near San Francisco, but the transcript was not agreed on and it was surmised that the recording was made by AH (p. 81 – 82 of pdf) [the recording

was made by AH without JD's knowledge or permission. she probably tried to set JD up with breaching the TRO, possibly with a sexual assault.]

- [several parts of this recording have been made public. the ['cut me'](#) (3:37) clip where JD begs AH to cut him was published by [Daily Mail](#) in *'Cut me wherever you want, or I will': Court is played terrifying recording of Johnny Depp begging Amber Heard to slice him with a knife* by Jack Wright on 10. 7. 2020, 16:40 GMT. ['drugs'](#) (0:10, at 8:06 – 8:16), ['hug me'](#) (2:16, at 0:36 – 2:52), ['die'](#) (00:04, at 1:03 – 1:07), ['love me'](#) (0:04, at 13:10 – 13:14), ['everything'](#) (00:53, at 13:37 – 14:30), ['drinking'](#) (0:18, at 11:32 – 11:50), ['admit'](#) (0:07, at 7:58 – 8:05), ['cut me'](#) (3:37), ['headbutt'](#) (0:29), ['stripper'](#) (1:45, at 0:41 – 2:06) clips have been incorporated in the Discovery+ documentary titled *Johnny's Story* and that part, accompanied by Mr. Sherborne's commentary, was posted as *Amber Heard & Johnny Depp Secret Meeting in San Francisco* by [River](#) (25. 12. 2021). a short [transcription](#) from the 'hug me' conversation was twitted by @samjrakoh on 19. 12. 2021, and that part was analysed by Andy in *Amber Heard 'I Was Afraid of Johnny Depp!'* and posted by [SEC](#) (23. 12. 2021, 7:45). several clips were commented on by Les and Stevie in *Documentary deception Johnny v Amber part 1* on [Stevie J Raw](#) (recording at 3:18 – 7:07, 24. 1. 2022). a psychological analysis of the context of the meeting, texts between JD, AH and Christian Carino, and what was at the time known of the recording was done by [Colonel Kurtz](#) in *Amber Heard & Johnny Depp Secret San Francisco Meeting: Psychological Analysis* (4. 2. 2021, 34:25)]
- reference to **original and complete recording between JD and AH in or near Toronto in or around 9. 2015** (p. 81 of pdf)
- reference to a partial **recording between JD and AH made on 15. 6. 2016 which incl. a reference to Toronto recording** (p. 81 of pdf)
- reference to a partial **recording between JD and AH from 2016 which incl. a reference to Toronto recording** (p. 82 of pdf)
- reference to **Elon Musk meeting AH at the Eastern Columbia Building from 1. 3. 2015 till 22. 5. 2016** (p. 83 of pdf)
- judge Nichols refused JD's application for disclosure order against AH
- **29. 06. 2020 – draft judgement**
 - NGN's application for a declaration that the JD's claim was struck was not granted
- **29. 06. 2020 – JD's application notice for relief against sanctions**
- **02. 07. 2020 – judgement granting JD relief against sanctions & refusing application that AH should make third-party disclosure** is attachment 3 in AH's 2nd notification of adjudicated facts from 7. 7. 2021, p. 73 – 84 of pdf ([AdjuFact2](#)) and on p. 15 – 31 of pdf in AH's notice of judicial notification of UK court rulings impacting this matter from 9. 7. 2020 ([pdf](#)) ✓
 - 35. Category 1(a) The raw file that is the **original and complete recording made by the Third Party Respondent on 22 July 2016 when she and the Claimant met in or near San Francisco or**, if that is not available, the most proximate copy thereof.
 - 36. On 16th June 2020 the Defendants' solicitors sent a letter to Schillings disclosing an audio file of a conversation between the Claimant and Ms Heard

which was said to have taken place in San Francisco in 22nd July 2016. The letter also included a transcript of that recording which, Ms Afia says, is not agreed.

- 37. The Defendants have not answered a request from Schillings as to the provenance of the recording, but Ms Afia invites me to infer that it must have been made by Ms Heard. ... It seems that the recording has not been disclosed in the Virginia proceedings.
- 45. Category 1(c) **The raw file that is the original and complete recording made by the Third Party Respondent, or if that is not available, the most proximate copy thereof of the conversations between the Third Party Respondent and the Claimant which took place in or near Toronto in or around September 2015** and which are referred to on pages 4 and 5 of the transcript identified in paragraph 1(b)(i).
- 46. Ms Afia explains that the Defendants have disclosed 2 other recordings: one was of a conversation on 15th June 2015, the other was on an unknown date in 2016. She says that these recordings are of only part of the conversation in question. Further, in one or both there is reference to another conversation between Ms Heard and the Claimant which occurred in Toronto. At various stages, Ms Heard offered to send the Claimant the 'Toronto tapes' but she has never done so.
- 63. JD is granted relief against sanctions
- 64. JD is refused third-party disclosure order against AH
- **03. 07. 2020 – court ruled that JD breached the unless order from 10th March**
- **03. 07. 2020 – JD seeking direction that AH should be excluded from court room until she gave evidence**
- **04. 07. 2020 – judge Nichols' written decision refusing JD's direction above**
- **04. 07. 2020 – Amber Heard's 6th witness statement ([AmHe 20-07-04 w6](#)); [listen](#) to it on Stevie J Raw's YT channel (22. 2. 2021) ✓**
 - 3. – 7. are various documents and photos: Core Trial Bundle – they are described but no exhibits are provided
 - Tab 148, F894.003 photo of drugs in **bathroom at Disneyland for JD's film premiere [is this the photo from 8. 4. 2015?]**
 - Tab 148, F894.005 – F894.009 photos of JD passed out in hotel room in Tokyo [**the ones where he is laying on the floor beside the bed?**]
 - Tab 148(a), F894.014 – F894.018 JD with his weed
 - Tab 148(a), F894.022 photo of her alleged injury to face after Met Gala in NY where JD also caused damage to a hotel room
 - Tab 148(a), F894.024, F894.026 photos of JD passed out after opiates at Eastern
 - Tab 148(a), F894.028 – F894.046 photos by JD of AH from Bahamas in 2014
 - Tab 148(b), F894.053 [photo](#) by **AH's lawyer** of scars on her arm after 3. 2015
 - Tab 148(b), F894.055 – F894.067 photos of JD with injured finger in his doctor's office in LA before surgery [**why was she taking photos there anyway?**]
 - Tab 148(b), F894.122 [photo](#) of clump of hair on 15. 12. 2015
 - Tab 148(b), F894.126 – F894.130 photos by AH of alleged injuries from **1. 2016**

- Tab 148(e), F894.234 [photo](#) of AH, Amanda de Cadenet and Amber Valletta at Ms. Cadenet's birthday party on 22. 5. 2016
- Tab 148(e), F894.235 [photo](#) – F894.237 [photo](#) from the court house from 27. 5. 2016
- Tab 197 original and transcribed journal entries made by both in JD's journal
- Tab 62, H686-697 screenshots of texts between AH and Christian Carino... [who] arranged the mediation attempt [[seriously!?](#)] between Johnny and me [in San Francisco on 21-22 July 2016](#). [these [text1](#), [text2](#), [text3](#), [text4](#), [text5](#), [text6](#) from after Mr. Musk broke up with AH. [text1](#) from 13. 9. 2017.]
- Tab 65, I4-I5 emails from 14. – 17. 11. 2013
- Tab 80, I30-31 unsent letter from AH to JD from after 20. 2. 2016 [[interesting date, just over a year after the marriage](#)]
- Tab 87, J1.1 – J1.3 photos of damaged hotel room in NY on 5. 5. 2014
- Tab 91, J6 photo of alleged injury from 1. 2016
- Tab 92, J6 photo marked as from 21. 5. 2016 but is in fact by Ms. Pennington from 16. 12. 2016
- Tab 95, J27 photo of alleged injuries from [6. 1. 2016](#)
- Tab 95, J39 photo of JD's message on a coaster from 22. 7. 2016
- Tab 95, J40 – J42 [photo](#) and [photo](#) of alleged leg bruises after the ['kitchen cupboards' video from 2. 2016](#)
- 9. ...I have now realized I cannot be sure that the painting incident took place on 8 March 2013. There were numerous incidents of violence in March 2013 and many fights over that month about the painting. [[right, after those texts revealed that nothing happened on 8. 3.?](#)] Similarly, the incident at Hicksville ... may have been at the very end of May or early June. [[this is a weird one. weren't they camping for JD's birthday? ok, it's possible it was not on the exact date of his birthday. I wonder what prompted this statement. another bunch of texts that contradicted the story?](#)]
- **06. 07. 2020 – order denying JD's request that AH not be permitted to attend the trial until she is called to give evidence** is on p. 49 – 51 of pdf in JD's opposition to AH's supplemental plea in bar from 28. 6. 2021 ([JD-OppPleaBar](#))
- **06. 07. 2020 – Amber Heard's 7th witness statement** ([AmHe 20-07-06 w7](#)); [listen](#) to it on Stevie J Raw's YT channel (25. 2. 2021) ✓
 - 3. – 4. are various documents and photos which are described but no exhibits are provided
 - Tab 148(f), F894.261 [photo](#) of cocaine in bathroom of 80 Sweetzer on 8. 3. 2013 [[I thought they were at their house on Orange?](#)]
 - Tab 148(f), F894.[262](#) – [263](#) photos of cocaine at her house in Orange on 22. 3. 2013 [[ah! the story changing dated photos!](#)]
 - [[those photographs with cocaine lines, here listed in the correct time sequence, are](#) [photo 1](#) (8. 3. 2013, ?bathroom at the Sweetzer, F894.261, AH's 7th witness statement), [photo 2](#) (22. 3. 2013, ?kitchen of AH's LA house on Orange, not shown in court but probably one of the unknown photos from AH's 7th witness statement), [photo 3](#) (22. 3. 2013, 13:37, ?kitchen of AH's LA house on Orange,

F894.263A), [photo 4](#) (22. 3. 2013, ?kitchen of AH's LA house on Orange, with JD's box F894.262 and F894.262A), and photo 5 (8. 4. 2013, 23:38, text from Ms. Henriquez allegedly sent to JD from her workplace, but in reality sent to AH ('Sis') who was in Paris filming *3 Days to Kill* (see [here](#))). **they were analysed by Andy from London in [part 1](#)** (*Exposing the Lies of Incident 2*, 7. 9. 2021, 1:30:03), [part 2](#) (*The Set Up*, 11. 9. 2021, 51:18) and [part 3](#) (*Robbed Blind*, 11. 9. 2021, 58:07) of *Exposing Ambers Lies* series streamed live by SEC, Stevie J Raw and Doctor Soup] [[photo](#) of AH with Ian McLagan at the Sweetzer studios from 23. 3. 2013, [photo](#) of JD, AH, Keith Richards and Ms. Henriquez from 24. 3. 2013, [order/order](#) of the Smeg fridge from 9. 10. 2014][[photo](#) of JD apparently passed out from drugs on the floor of a hotel room, [photo](#) of JD sleeping with a melting ice cream in hand]

- Tab 148(g), photo of JD with Dough Stanhope on 8. 12. 2013
- Tab 148(h), F894.263 – F894.268 photos by Jack Depp of JD and AH in Bahamas on 26. 12. 2015
- Tab 148(h), F894.269 – F894.271 photos of JD and AH from 23. 12. 2015
- Tab 148(j), **audio recorded by AH on the NY – Boston flight on 24. 5. 2014** [the recording (0:17) is at 0:30 – 0:47 of *Audio of Johnny Depp 'groaning' on private plane released by The Telegraph* from 9. 7. 2020]
- Tab 201(a), Mr. Murphy's statement in Australia proceedings
- 5. ...I have been able to identify the dates of two incidents ... in March 2013. ... I now realize that the incident that I had initially described as having taken place on 8 March 2013 took place on 22 March 2013. [**yeah, because emails and [photos](#) from 23. 3. and Ian McLagan's travel documents proved she lied.**] ... The incident I describe involving the painting took place on 22 March 2013...
- **2020 – Erin Boerum's notes and texts ([ErBo 2020 notes](#))** from UK trial transcripts ✓
 - note from 7. 3. 2015 (file 9, tab 132, p. K205) – AH self-administered **Seroquel at 4:30** due to insomnia, then **slept from 5:00 till 9:30**
 - note from 8. 3. 2015 (file 6, tab 132, p. K205) – AH returning to LA next day, Xanax new dose at 20:15 PST [**14:30 local time**] [**they were staying in Queensland, Australia and 20:15 PST is 14:15 next day in Queensland**]
 - [note](#) from 9. 3. 2015 (file 9, tab 132, p. K205) – AH arrived in LA at 15:00, had dinner with friends and Ms. Boerum at 22:00
 - text from ? () [the first text is covered up the by a text from 21. 5. 2016]
 - texts from 16. 12. 2015, **00:00** – 22:26 (file 2.1, tab 71.3, p. E606.67-68; file 7, tab 19a, p. H127.1) – AH is having hair and makeup from 14:00 to 16:00, last text from 16:08 but Ms. Boerum wasn't at AH's
 - note from 16. 12. 2015 (file 4. tab 139, p. F880)
 - texts from 17. 12. 2015, 00:05 – 20:07 (file 7, tab 19a, p. H127.1-2) – iO is with AH
 - note from 17. 12. 2015, 23:00 (fie 4, tab 139, p. F880-880.1)
 - note from 18. 12. 2015 (file 4, tab 139, p. F880.1)
 - note from 19. 12. 2015 (file 4, tab 139, p. F880.1)
 - note from 21. 12. 2015 (file 4, tab 139, p. F880.1)
 - texts from 31. 12. 2015, 9:03 – 15:46 (file 9, tab 119, p. K134)

- texts from 21. 5. 2016, 22:07, 23:52 (file 7, tab 28a, p. H144.6) – at 23.52 AH writes that cops just left
- texts from 22. 5. 2016, 00:36 – 13:30 (file 7, tab 28a, p. H144.6-7), with 2 photos
- various excerpts from AH's trial transcripts from ?, p. 1545-1547, 1584-1585, 1593-1594, 1912
- also a text from iO Tillet Wright from 16. 12. 2016 at 13:41 – I get in at 11. [Mr. Wright landed around 23:00]
- **2020 – Connel Cowan's notes (CoCo 2020 notes) ✓**
 - texts from 15. 12. 2015, 18:26, 20:00, 22:05 (file 9, tab 114, p. K122; file 7, tab 13a, p. H81.1) [could 18:26 indicate that the incident didn't happen "on the night" as AH claims in her 1st UK witness statement, par. 137, but in the afternoon? according to 20:00 the incident definitely happened before then.]
 - text from 16. 12. 2015, 00:03 (file 7, tab 13a, p. H81.1; file 9, tab 133, p. K278)
 - text from 16. 12. 2015, 9:12 (file 7, tab 13a, p. H81.1)
 - texts from 16. 12. 2015, 14:59 – 16:21 (file 7, tab 13a, p. H81.1) – then dealt with security [what security?]
 - note of psychotherapy session from 16. 12. 2015 (file 9, tab 133, p. K277)
 - texts from 20. 12. 2015, 19:35 – 20:21 (file 7, tab 20a, p. H129.1) – AH claims JD wants to leave [already? or is this just a tactic because one-year-marriage anniversary is coming up? they looked very lovey-dovey at the Art of Elysium Gala in January]
 - text from 22. 12. 2015 (file 9, tab 133, p. K281) – AH claims JD committed to couple counselling [and the tape recordings from September of this year are of what then?]
 - notes from 8./9. 3. 2015 (file 9, tab 133, p. K255)
 - text from 9. 3. 2015 (file 9, tab 133, p. K256)
 - excerpt from AH's trial from ?, p. 1528
- **07. 07. 2020 – skeleton arguments & opening statements**
 - JD's opening statement (JD-opUK)
 - JD's skeleton argument (JD-skUK)
 - NGN's opening statement (NGN-opUK)
 - NGN's skeleton argument (NGN-skUK)
- **02. 07. 2020 – JD's skeleton argument (JD-skUK) ✓**
 - 7. The principal issue at trial will be the defence of Truth. In advancing that defence, the Defendants rely upon 14 alleged incidents when they contend that the Claimant was guilty of domestic violence against Ms Heard.
 - 11. They started their relationship in late 2011... [interesting, rumours only started six months later. and apparently they were still officially together with their previous partners. AH was actually sort-of married to Ms. van Ree. JD's relationship with Ms. Paradis seemed to have deteriorated by then.]
 - 17. In September 2013, Ms Heard agreed to get engaged... ...in 2014, she moved into one of the penthouses at the [Eastern]...
 - 21. In or around early 2015, [JD] asked [AH] to sign a pre-nuptial agreemend... They argued about it. She refused to sign. Their private doctor reported in an email on

27. 1. 15 to Ms Heard's therapist that there had been a difficult flight to Tokyo, including Ms Heard attempting to "leave the plane while they were over the fucking ocean".
- 22. [incident 7] ...they were there [in Tokyo] to attend a film premiere on 27 January 2015 on a trip in which they were accompanied by the Claimant's two children.
 - 37. On 30 March 2016 MS Heard wrote a letter to the Claimant, thanking him for taking care of her, and described herself as "the luckiest woman on Earth"...
 - 41. Ms Heard then went to the Coachella music festival for a few days [22. – 26. 4. 2016]. ... the short video from that trip... [presumably the one with AH driving her car with friends in it.][[still1](#), [still2](#), [still3](#), [still4](#), [still5](#) from that video from 26. 4. 2016, which was filmed by Samantha McMillen (sic!) when they were driving back from Palm Desert and was taken down from Instagram, are on [jambernews](#), posted 6. 7. ????. Amber is driving, Whitney is in the passenger seat, and Raquel Pennington and Samantha McMillen are in the back seat. it is not Samantha that is in the car, it is Savannah McMillan, AH's assistant. she is called Suzanne on this site. another [still](#) without the play icon, and a [screenshot](#) of Ms. McMillan's original post.]
- 02. 07. 2020 – JD's opening statement ([JD-opUK](#)) ✓
 - 6. Ms. Kendall's complaint to NGN: "...I have heard SEVERAL times that she was in fact abusive to him... I said over and over that I didn't KNOW that he had caused her harm. ... I'm telling you that you misquoted me and intentionally took things I said out of context in what I now realize was your purpose in defaming Johnny Depp...."
 - 10. ...other than in relation to one of the alleged 14 incidents, for which her sister (Whitney) claims she was present, none of these friends of hers witnessed any of the physical assaults...
 - 11. Recently, Ms Heard raised one new allegation that she has even asked to be heard in private... which has never been raised before, nor made anywhere in the last four years since this story has been blasted across publication after publication...
 - 13b. ...camp in Hicksville, which is one of the more recent allegations...
 - 17. ... early-recorded conversation between them from September 2015. [a transcript of the recording is 4/F/154]
 - 18. – 19. [paraphrasing from the recording] AH complains over and over that JD doesn't fight, AH throws pots, AH begs JD not to retreat from a fight (argument), AH admits to hitting JD and starting a physical fight, "I fucking was hittin' you"
 - 23. ...recording, disclosed in the course of the US divorce proceedings, Ms Heard admits to having kicked a door into crouching [JD]'s head, and then [she admits] punched him... in the face on purpose [transcript is 9/L/138][this is this the bathroom incident: [excerpt](#) (2:39)]
 - 24. ...in a recently disclosed recording made by Ms Heard of the ... meeting she sought with Mr Depp in July 2016, Mr Depp refers back the incident alleged ... her birthday in April 2016 [typo, it says 2015]

- 25. ...this **recording** was **made without** Mr Depp's **knowledge or consent**, which meant **she was committing a criminal offence in the United States**.
- 33. ...on 26. September 2015, Mr Depp and Ms Heard had a long exchange of text messages.
- 34. [26. 9. 2015] JD: *"...Wouldn't even admit to clocking me in the jaw to Travis..."*
- 35. [26. 9. 2015] JD: *"I have also summarized that from the last 5 or 6 sucker punches to my face and head, that you aren't all that happy..."*
- 37. ...when asked to sign a pre-nuptial agreement, she created a huge argument and point-blank refused... she did the same thing when he asked her to sign a post-nuptial agreement instead.
- 60. [15. 12. 2015 Headbutt] JD: *"The PH3 marriage has gone sideways...We've been amazing for like 4 months!!!"* [**what about punches in September and the iced tea bottle into the head in October?**]
- **03. 07. 2020 – NGN's skeleton argument** ([NGN-skUK](#)) ✓
- **06. 07. 2020 – NGN's opening statement** ([NGN-opUK](#)) ✓
 - 61. Mr Depp [wrote](#) the following day [**16. 8. 2016, to Mr. Carino**]: *"She's begging for global humiliation. She's gonna get it. I'm gonna need your texts about San Francisco brother... She will hit the wall hard. I met a fucking sublime little Russian here..."* [**wasn't JD with Polina Glen in 2019?**]
 - 64. On the 16th August, Mr Depp wrote: *"Settled with the whore ...7 mil... Can you fucking imagine? Charges dropped for 7 million."*
- **07. 07. – 28. 07. 2020 – court in session**
 - transcript from 7. 7. 2020 ([UK7](#)) ✓
 - transcript from 8. 7. 2020 ([UK8](#)) ✓
 - transcript from 9. 7. 2020 ([UK9](#)) ✓
 - transcript from 10. 7. 2020 ([UK10](#)) ✓
 - transcript from 13. 7. 2020 ([UK13](#)) ✓
 - transcript from 14. 7. 2020 ([UK14](#)) ✓
 - transcript from 15. 7. 2020 ([UK15](#)) ✓
 - transcript from 16. 7. 2020 ([UK16](#)) ✓
 - transcript from 17. 7. 2020 ([UK17](#)) ✓
 - transcript from 20. 7. 2020 ([UK20](#)) ✓
 - transcript from 21. 7. 2020 ([UK21](#)) ✓
 - transcript from 22. 7. 2020 ([UK22](#)) ✓
 - transcript from 23. 7. 2020 ([UK23](#)) ✓
 - transcript from 24. 7. 2020 ([UK24](#)) ✓
 - transcript from 27. 7. 2020 ([UK27](#))
 - transcript from 28. 7. 2020 ([UK28](#))
- **07. 07. 2020 – transcript from court hearing** ([UK7](#)) ✓
 - ...to be able to listen to recordings ... of new footage... (p. 7)
 - [**Johnny Depp**]
 - **recording from 25. 9. 2015** ... from AH's 5th witness statement ... **called "Argument 2"** (p. 22 – 23) [[part 1](#) (1:05:13) and [part 2](#) (59:41), unofficial transcript of same [part 1](#) and [part 2](#)]

- ...later, when you refer to the conversation, ... Ms. Heard... would say something very different from what we had talked about before. It was radically different. So, I, at that time, thought that the best thing to do was to record the conversation and so I retrieved my telephone and... said, "I am going to record this conversation"... So, I used it to play it back to her, just to show her what she said, essentially." (p. 24) [so, there we have AH's 'playing back the recordings' suggestion.]
- I had asked Travis up the night prior, when another argument had ensued, and...it got physical, ending with a bit of assault, and Ms. Heard struck me. (p. 29)
- As was my practice in these situations, whenever it would escalate, I would try to go to my own corner,... so that – I thought it important that we separate before things got out of hand. (p. 31)
- ...another recording, which it is one that Ms. Heard provided recently. ... there is no dispute there was a **recording made by Ms. Heard on 22nd July 2016** (p. 31) [**'drugs'** (0:10, at 8:06 – 8:16), **'hug me'** (2:16, at 0:36 – 2:52), **'die'** (00:04, at 1:03 – 1:07), **'love me'** (0:04, at 13:10 – 13:14), **'everything'** (00:53, at 13:37 – 14:30), **'drinking'** (0:18, at 11:32 – 11:50), **'admit'** (0:07, at 7:58 – 8:05), **'cut me'** (3:37), **'headbutt'** (0:29), **'stripper'** (1:45, at 0:41 – 2:06) clips. part of the audio from the documentary *Johnny's Story* with attorney's commentary (1:25, at 0:41 – 2:06) was posted by **Rob's Rules** (5:10, 24. 12. 2021). the whole audio without attorney's commentary (2:57, at 12:12 – 15:09) was commented on by **Autumn on Venus** (18:45, 22. 12. 2021). excellent analysis of *Johnny's Story* documentary by Les and Stevie on Stevie J Raw in **part 1** (23:44, 24. 1. 2022) and **part 2** (34:28, 25. 1. 2022). excellent analyses on *Amber's Story* documentary by Les and Stevie on SEC in **part 3** (33:43, 26. 1. 2022) and **part 4** (35:57, 27. 1. 2022).]
- It was Ms. Heard requested to meet with me. ... This recording took place **on the second day**, it was a hotel in San Francisco, I believe, it was the Omni, I believe. ... I just rented a room... She wanted me to embrace her. ... I did not. ... I did not think it was right [to embrace her], given the circumstances if she had said that to the world that she was in fear for her life and from me ... I did not understand why she would want to touch me. ... It was quite a long discussion. ... I walked her to the bedroom, ... got her in bed ... before I covered her, she looked at me and asked me if I was getting in with her. ... I said no... and walked back into the living room. ... I was trying to make sense of everything. ... **did Ms. Heard seem scared or terrified of you? -- No, not at all.** (p. 33 – 35) [**how many times did they meet in SF if the recording was made on the second day?**][**text1**, **text2**, **text3**, **text4**, **text5**, **text6**, **text7**, **text8**, **text9**, **text10**, **text11**, **text12** between JD to Mr. Carino right after the meeting. some were published in *Johnny Depp Refuses to Allow 'Undeserved Wife Beater Charge' In Explosive New Text Messages* by Mike Walters for **The Blast** from 9. 10. 2020 24:03, and in *Newly Revealed Texts Between Johnny Depp and Amber Heard shed Light On Lawsuit* by Jacob Dressler for **screengeek** from 10. 3. 2020]
- **The end of the relationship was April 22nd [2016].** (p. 36)
- I did every kind of drug there was, by 14. (p. 37)

- reference to interview with Playboy magazine (p. 39) [I'm not entirely sure it's this one but I think it is, and it's a pretty long one: *A candid conversation with America's quirkiest actor about Kate Moss, River Phoenix, his offbeat films and why he likes to stick strange things in his pants* by Kevin cook for [Playboy](#) from 1. 1996]
- At that time, in my youth, ...my experience with narcotics and stimulants or alcohol began at a very young age when it was not a particularly stable or secure or safe home life, and there was quite a lot of unpleasantness in the house. ... I think it was around the age of 11 that it dawned on me that nerve pills were calming her [mother's] nerves, so I brought her her nerve pills and I took one. ...the only way that I found to numb the pain. (p. 40 – 41)
- cocaine, ecstasy, MDMA, LSD when much younger, mushrooms, never ketamine, cannabis, prescription drugs (p. 41 – 42)
- So to suggest that you had taken drugs with Marilyn Manson after 2011, for example, would be quite wrong, would it? -- Yes. (p. 45)
- Your name... has become a product. **So the sound of my own name, even when I speak my own name, sounds foreign to me.** (p. 50)
- No, **I do not have an anger problem.** (p. 50)
- reference to article *Depp stuck* by William C. Trott for [United Press International](#) from 10. 3. 1989: "Depp, 25, was arrested and held in custody for three hours early Wednesday after police answered a noisy party complaint at a hotel in the West End section of Vancouver where '21 Jump Street' is filmed." (p. 51) [another article about this by Shauna Snow and Aleene MacMinn for [Los Angeles Times](#) from 11. 9. 1989, 12h]
- reference to article *Depp to pay for trashing room* for [Tampa Bay Times](#) from 1994, republished 7. 10. 2005: "Actor Johnny Depp, star of the movie Benny and Joon, agreed to pay nearly \$10,000 to a New York hotel after he destroyed his room there, the Manhattan District Attorney's office said Tuesday. Depp, 31, had stayed overnight at the Mark Hotel in New York City's fashionable Upper East Side neighborhood with his girlfriend, supermodel Kate Moss." (p. 52 – 53)
- reference to TV interview "*Johnny Depp. The ultimate outsider*" by Elizabeth Vargas for [ABC News](#) from 20. 6. 2003, also on [deppdive](#): "Voiceover. No one was laughing when Depp trashed a fancy hotel room..." (p. 58 – 63) [at least I think this is the correct interview, because it doesn't contain the exact words read in the court room, the part pertaining to the hotel room is at 3:50 – 3:55]
- references to transcript of Ellen Barkin from 2019 [co-star in Fear and Loathing in Las Vegas, from the VA case]: "He was drunk all the time, a lot of the time." (p. 19) .. a red wine drinker (p. 19) ... [use of] hallucinogenics (p. 20) "Did there come a time, Ms. Barkin, when Mr. Depp acted in a way that was out of control with you? - Yes, Mr. Depp threw a wine bottle across the room, the hotel room, in one instance, in Las Vegas, while we were shooting..." "Now, did you ever observe, Ms. Barkin, Mr. Depp's behaviour change when he drank more or used drugs? -- I did not." I can tell you unequivocally that Ms. Barkin's statements about that she believes happened is not at all what happened. ... That incident never happened. "And who did he yell at that you witnessed -- His assistant, people who would work

on the film, maybe in what he viewed as a lower capacity than he functions at. There is just a world of violence." (p. 18) "He is just a jealous man, controlling." (p. 33) "And when in these instances, when Mr. Depp became jealous or controlling, did he also become angry? -- Yeah, and demanding." (p. 34) (p. 64 – 67, 71 – 72, 77 – 80)

- You never take controlled drugs during the course of making a film? -- I take the normal medications that my doctor has prescribed. ... I have at times smoked marijuana at work. And at times, when you are on your 17th hour of the day, yes, I have taken cocaine. But occasionally, not as a regular. (p. 68)
- My, the people that I work with, such as assistants for security, are not jut hired hands. I do not think of them as my employees or someont who works for me. I think of them as people who work with me, and more, since we have all been together for quite a number of years, they are more like family. So, they have never ever backed off from approaching me with something if they have any concerns on any subject. (p. 75)
- Never do I speak down to anyone. Never would I think of anyone as lesser than me. ... I do not believe in the idea of stars and fame and all that. (p. 80)
- reference to article *Johnny Depp fends off paparazzi* by --- for --- from 1. 2. 1999 (p. 82, [83](#), [84](#), [85](#), 86, 87) [couldn't find this article but found this one, *Cops: Johnny busted for Depp-lorable conduct* by Bill Hoffmann for [New York Post](#) from 1. 2. 1999, 5:00; and this one *UK Depp arrested after scuffle* for [BBC News](#) from 31. 1. 1999, 13:11 GMT]
- reference to article *Depp punched crew member in drunken tirade* for [BBC News](#) from 10. 7. 2018 (p. 89 – 93)
- ...because of the abuse in your childhood, it turned you against the use of violence of any sort; is that right? -- Yes, it very much turned me against violence or – I would prefer to avoid confrontation. (p. 94)
- reference to article *The Trouble With Johnny Depp* by Stephen Rodrick for [Rolling Stone](#) from 21. 6. 2018, 11:51 ET (p. 96)
- "kitchen cupboards smashing video" recorded by AH on her telephone without JD's knowledge or permission in the Sweetzer in 2012/2013 [according to JD] or 2. 2016 [according to AH]: JD says this video was taken quite a while before the end of our relationship ... just after the time that I hade made ... The Lone Ranger ... in 2013. (p. 97 – 106) [a [low quality edited version](#) (1:37) was leaked by AH? to [TMZ](#) and published on 12. 8. 2016, 19:28 PT. another [edited low quality version](#) (1:30) was published by [Daily Mail](#) on 10. 7. 2020, 16:40 GMT. the [full version](#) (2:10) was shown by JD's legal team in UK closing submissions on 28. 07. 2020, p. 2546 – 2550 and posted by [Incredibly Average](#) (14. 8. 2020, 2:08, transcribed), [Arbuckling](#) (14. 8. 2020, 3:09, with a bit of background information), and [Amber Turd](#) (14. 8. 2020, 2:04).]
- Do you behave in a way that is different when you have had a lot to drink? -- No. -- Are you sure about that? -- Very sure. (p. 98 – 99)

- Because if I disagreed with Ms. Heard in any way, and I voiced it, then I was the monster. ... She said I was the monster, whenever I answered back in the same way that she was addressing me. (p. 105)
- She is a very beautiful woman, yes? -- She was a very beautiful woman, yes. (p. 108)
- reference to article *Amber Heard's Ex-Girlfriend Tasya van Ree Speaks Out Following Domestic Abuse Allegations* by Lily Harrison for [Eonline](#) from 8. 6. 2016, 21:57 (p. 112)
- reference to article *Amber Heard arrested for domestic violence against girlfriend* for [TMZ](#) from 7. 6. 2016, 1:00 PT (p. 112 – 113)
- Ms. Heard's attitude towards Ms. van Ree at the time [when JD and AH started seeing one another] was not the most pleasant. She did not have the nicest things to say about Ms. van Ree. (p. 115 – 116)
- I would definitely say towards the end of my relationship with Ms. Paradis ... it was a very painful time to break up with someone that you have been with for 14 years and that you have two children with. So, it was a very painful time, and I was more then likely trying to numb myself as much as possible. ... I would say that I was abusing alcohol, I do not know that I was abusing drugs... (p. 116 – 117)
- Mathias Bouchion is someone who worked at our house in the South of France, for the past 20 years. (p. 117)
- reference to email from JD to Mr. Bouchion from 8. 2. 2012: "I have been trying to numb and self-medicate my [emotional] pain for years. ... After two separate lengthy stays in the hospital to go off alcohol and pills, I know now, after almost two months of sobriety that I was not happy and from the doctor's discoveries that had I continued I was going to die, the liver has had enough." (p. 117 – 121) [ok, so AH's reference to the liver has real background.]
- I have always respected her [Ms. Paradis] and I, of course, love her very much and we are very close. (p. 122)
- ...when I was with Ms. Paradis for those 14 years, I did not touch cocaine. I was not even smoking marijuana then. I had stopped drinking spirits. I was drinking only wine for the entire period. (p. 127)
- This [when JD and AH started seeing each other, and drank wine together] was later 2011 ... because ... you went into rehab around the beginning of 2012? – Yes, I checked into a hospital in New York to stop drinking. (p. 129)
- The premier of The Rum Diary in Los Angeles was the same day as the press conference in Los Angeles. We did the press conference, and at the end of the day, I invited Ms. Heard and the director, Bruce Robinson,... to come to the... hotel room... to have a glass of wine. Ms. Heard showed up, Mr. Robinson did not. We shared a bottle of wine and we spoke. That was when I found out that she and her ex, or her wife, now her ex, were going to be, and I was, or the relationship with Vanessa was unfortunately very – it crumbled. (p. 130)
- I left the hospital and... checked into a hotel. Ms. Heard was coming over that night. When I arrived at the hotel, I immediately opened a bottle of wine. She arrived and I poured us glasses of wine and we drank. ... It was not a rehab. (p. 132)

- I got sober of alcohol and remained sober. ... I was not drinking the entire shoot of Lone Ranger, which was probably a six-month shoot. -- And you had friends supporting you... through this attempt at sobriety? -- Charlie Durnit ... Elton John [email from 22. 3. 2012 about 100 days of sobriety] (p. 132 – 133)
- [AH] was telling me that how much she did not want to be objectified any more and she did not want to be looked at as the pretty girl or she did not want to have to get her breasts out or be nude in a film any more. And I said, well, do not, you do not have to. And so, she wanted my advice, and I gave her my advice. And unfortunately, or fortunately, she continued to do the same type of films, and I thought to myself, I thought that she was above them. ... I would never tell her what to wear, but I would certainly make mention if I thought... what she was wearing was completely against the grain of what she told me her wishes were... (p. 141)
- [well, AH continued to model and do photoshoots in scantily clad clothing and film controversial shoots when she was with JD. eg. for [Elle](#) from 9. 6. 2013 about which this article appeared: 'I Fall In Love Again And Again': Amber Heard Tells Elle About Marriage To Johnny Depp by Barnali Pal Sinha for [International Business Times](#) from 10. 6. 2015, 13:15; *Johnny Depp's Love Amber Heard Gets Intimate With Another Woman in Sexy Video Shoot* by Rebecca MacAtee for [E!News](#) from 3. 7. 2013, 15:14; *Amber Heard strips to lacy underwear in sexy photoshoot and talks engagement to Johnny Depp* by Rebecca Pocklington for [The Mirror](#) from 27. 5. 2014, 22:08; *Amber Heard: Hot in lingerie, Johnny Depp's darling is talking about her again* for [Russian GQ](#) from 13. 11. 2014; [photo](#), [photo](#), [photo](#), [photo](#), [photo](#), [photo](#), [photo](#) by Terry Richardson for article "Wir müssen kämpfen! Sonst können wir Frauen nicht erwarten. Geschichten angemessen erzählt werden" ('We have to fight! Otherwise we women cannot expect stories to be told appropriately') for German magazine Interview from 6. 2015; *You Don't Know the Real Amber Heard – But You're About To* by Gaby Wood for [Marie Claire](#) from 12. 11. 2015 ([printed edition](#) 12. 2015); *'It's the greatest gift': Amber Heard, 29, talks about being stepmom to Johnny Depp's teenage kids while posing for racy shoot* by Ross McDonagh for [Daily Mail](#) from 12. 11. 2015, 16:49]
- [Rochelle] was a girl that I had dated, I was seeing before I started seeing Ms. Heard on a regular basis, yes. – Because this is... at the end of 2012... there might have been of an overlap there, do you not? – Possibly, yes. ... I ended up having to stopped ... seeing her. -- When did you stop seeing her? -- When things got serious and more serious with Ms. Heard; and Ms. Heard was very jealous of Rochelle. (p. 147 – 148)
- **08. 07. 2020 – transcript from court hearing ([UK8](#)) ✓**
 - [[Johnny Depp](#)]
 - [March 2013 in Los Angeles]
 - ... you felt so close to Whitney at that stage that you saved her telephone number on your phone as "Sis"? -- Yes. (p. 172)
 - **Ms. Heard told you that when she was 18, she was regularly taking cocaine.** – I would agree with that, she told me she was 16. ... there were many times in our

relationship early on where not only did she chop the cocaine with a razor blade into lines, she would then take the cocaine on her finger and rub it on her gums. (p. 182 – 183)

- reference to a photograph of a kitchen top with cocaine lines: I do not recognize this kitchen top. ... I would wonder if it were mine. I would wonder why it is photographed. ... I see clearly my credit card. ... I am not even able to say if that is cocaine or not. (p. 187 – 188) [probably one of these photos: [photo 2](#), [photo 3](#), [photo 4](#)]
- I have a horrible addiction to nicotine, yes. ... I have never had an addiction to cocaine. (p. 189 – 190)
- There were times when I suspected that Ms. Heard was being untruthful with me, and there seemed to be, at the time, good reason for me to have a care about what her actions were. (p. 192 – 192)
- reference to F894.001 [photo](#) of AH in the mirror with an alleged bruise on her arm? ... I have never seen this photograph, so she did not use it to remind me then. (p. 194 – 195)
- You always wear those rings, do you not? -- Yes, most of the time. (p. 196)
- The film set was at Sweetzer... (p. 196)
- ...there was another incident the night before the Keith Richards filming; is that what you are saying? -- Yes, ma'am. (p. 198)
- I did not remember the "Property of JD". Yes, that is a box. It was carrying cocaine in it. I would say I probably was then. (p. 202)
- And both Whitney and Ms. Heard remained with you for about four hours, trying to persuade you to leave the house to go to the film set... -- Yes, that is true. (p. 205)
- ...I was definitely partaking of the cocaine and the whisky that morning. ... I know Ms. Heard's sister, Whitney, was partaking of the cocaine as well. (p. 208 – 209)
- **Ms. Heard, in a lot of ways, is a creature of routine, and there were certain things that she needed to do for me that I was not allowed to do for myself ... it would not be anything out of the ordinary for her to chop those lines out**, and again, as I see it now, in my memory, I recall Nathan was called, Whitney was there, and she participated in the cocaine. -- Ms. Heard... would in fact chop the cocaine up for me so that I could do the line, and then she would press her finger into it and ingest it orally. ... it was a normal duty that she felt obliged to do early on. (p. 209, 211)
- reference to text from JD to Mr. Deuters from 5. 2013: "Might need some hydrogen peroxide and some butterfly bandages, cut my hand last night. ... May require stitches." (p. 218) [I accidentally came across this video (9:36) of *Bill Carter and the Blame feat. Johnny Depp @ David Letterman Show* from 21. 2. 2013 posted by [simo93661](#) (23. 2. 2013), where they also perform, and Johnny is playing a slide guitar with an obviously injured left ring finger.]
- Ms. Heard would drink two or three glasses of wine quite regularly in the evening ... even when you were trying to be sober? -- I beg your pardon, but it was two or three bottles. (p. 222)

- reference to texts with Paul Bettany from 4. 6., 11. 6. 2013 (p. 223 – 224) [[jpg1](#), [jpg2](#), [jpg3](#), [jpg4](#) (I'm not sure these are original screenshots, might be just mock-ups)]
- I had spoken to Mr. Bettany quite a lot, as we were working together, and he was a very close friend, so he knew of our arguments and fighting, and he knew details. (p. [225](#))
- unsent email from AH to AH from 11. 6. 2013, 18:06: she is calling JD "the abused, scared, insecure, violent little boy" (p. 226 – 227) [*I didn't get the feeling that JD sees himself as scared of himself or violent as a person. so I had a thought. could AH be writing these unsent emails/letters to her bipolar personality?*]
- *I will suggest... that it appears to me that Ms. Heard was building a dossier very early on that appears to an insurance policy for later.* (p. 231)
- [(9th) June 2013 in Hickswille] I was drinking myself and I was smoking marijuana. ... I was not using cocaine... I did not do any MDMA... because it... does not do much to me. (p. 236)
- ...if she [AH] is on a hallucinatory drug [mushrooms] and I am not on a hallucinatory drug to the degree that she is, then her recollection could be maybe a little skewed. (p. 241)
- I did not feel that I deserved to be screamed at, demeaned, and treated like garbage for having done something that I felt was right and correct. (p. 242)
- I spoke with the manager, brought him to the trailer, showed him the damage, and then he went to his office and returned with the replacement bulb. (p. 244)
- reference to F894.005 [photo](#) of JD sleeping/passed out to the right of a bed and there are two more photos like this, all from **18. 7. 2013**, according to metadata [which has not been challenged] (p. 251 – 254) [*there was a forensic report done prior to Mr. Latulippe's report and on different files? JD says in his 2nd witness statement that before the release of The Lone Ranger in July 2013, he had another five-day stint in rehab in the same hospital in NY and had not been drinking prior to the release of the film. he corrects that it was a detox, rehab typically lasts two to six months.*]
- If you wanted a small amount of alcohol, she was very worried that this was going to lead to other things and it became an issue? -- It was a way to control me. (p. 261)
- reference to text from JD to Ms. Henriquez from 4. 2014: "She's crossed the line again, always too much. She told me she was leaving again and she did. She's made the choice." (p. 282)
- [24th May 2014, Boston – LA flight]
- reference to dr. Kipper's note from 22. 5. 2014 (p. 285 – 286)
- AH's impressions about Mr. Franco during Pineapple Express, which include "creepy", "rapey" and "sexually aggressive" (p. 289 – 290)
- I was in Boston, is where dr. Kipper and nurse Debbie Lloyd came. ...I had agreed to and promised... that I was going to kick the Roxicodone. (p. 295)

- I suspected that Ms. Heard was having an affair with Mr. Franco. ... And it has since been confirmed that she was. ... I have been told that she was [having an affair with Mr. Franco at this time]. (p. 298)
- reference to the **Boston plane recording** with two transcripts, tab 148J1 and 148J2, **from 24. 5. 2014** (p. 308 – 312) [**there are strange noises on the recording, like groaning or moaning, or perhaps someone having a nightmare?, and very indiscernible male, and possibly female, voices. the recording was made by AH on 24th May 2014, 21:00:03 – 21:11:42 local Boston time – it was found on an old phone of hers. it was likely taped in secret.**; the recording (0:17) is at 0:30 – 0:47 of *Audio of Johnny Depp 'groaning' on private plane released* by [The Telegraph](#) from 9. 7. 2020]
- I have never heard that recording before. I would say that it sounds almost like some animal in pain. ... I cannot identify that sound as me. (p. 312) [**to be honest, it does and it does not sound as JD. weird.**]
- ...there was... with Ms. Heard, because she would not let go of her beliefs, I had to condition, you have to condition yourself to use words that she finds pleasing as opposed to something that will set her off, so there is a great deal of placation,... a great deal of it. (p. 316)
- texts between JD and Mr. Bettany from 30. 5. 2014 (p. 329 – 336)
- [after grueling JD about those texts:] I cannot recall whether I was doing cocaine, but from the condition that this text is explaining to Mr. Bettany, it sounds like it would not be out of the question in any way. ... But I would say, based on this text, that, yes, it is very likely that I was doing pills, alcohol, cocaine, marijuana, and certainly as I had not been detoxed from the Roxicodone, I was on Roxicodone as well. (p. 335 – 336)
- **09. 07. 2020 – transcript from court hearing ([UK9](#)) ✓**
 - [**Johnny depp**]
 - [August 2014, Bahamas detox]
 - ...[AH] was in control of the meds,... she would give me when it was time to take the meds,... But she could also withhold the meds at times. ... She was withholding the drugs that I was, the meds that would stop the process of the shakes and everything that goes along with the process, the receptors going crazy in the body. (p. 353)
 - ...there were incidents where, for example, the time allotted for me [to] take my medication by the nurse or by Ms. Heard, it if were 4 p.m. on the dot to take those, and it was 3.15, and I began to get the heeby-jeebies,... I have told Ms. Heard that I needed the meds as it was starting to come, the shakes, the stomach cramps,... and I told her it was time for the meds,... and she looked at the clock and said, "No, 4 o'clock." (p. 361)
 - I was not taking the Roxys that I went to the island to detox from and then finished the detox in Los Angeles. [in September 2014] (p. 367)
 - reference to text from JD to Ms. Lloyd on 22. 9. 2014, 1:25: JD had been in an argument with AH, and she had a nasty freak out. When the nurse arrived, the fight

escalated. (p. 368 – 369) [there is also a reference to JD's injuring his hand by punching a wall but it's not read out]

- I would rather express my anger by hitting an inanimate object than to ever possibly think of taking it out in the person that I love. (p. 369)
- You were at the island on 8th August to 19th or 20th. (p. 370)
- reference to text from 14. 10. 2014 regarding kicking a trailer door on a film set (p. 372 – 373)
- video recording from 14. 11. 2014, file 8, 71A: I was on the medications, which were quite strong (Phenobarbital, Lithium, Xanax). ... This is a drug addict who was coming off of a very, very unpleasant medication. (p. 374 – 375) [this is the [video](#) (2:39) of swaying JD presenting Hollywood Film Awards]
- reference to text from JD to AH regarding Clive Barker from 12. 12. 2014 (p. 377)
- I often describe myself in derogatory ways, and will be the first to be unkind to myself. (p. 379)
- [March 2015, Australia]
- When you are dealing with someone who cannot be wrong, you must devise a way to communicate with them that does not spur some monstrous argument, some hideous attack or verbal abuse. You must placate that person. (p. 381)
- ...according to the rules in California, on divorce, a wife is entitled to 50% of the wealth accumulated by her husband during the course of the marriage? (p. 383)
- ...since she was unwilling to sign a pre-nup,... my attorneys tried for Ms. Heard to sign a post nuptial agreement, which she said she was fine to do. She had said she was fine to sign a pre-nup as well, but it did not happen. (p. 383)
- On 11th February 2015, so a week or so after your marriage,... you flew to Australia to film one of the series of the Pirates...? (p. 384)
- ...I had spoken with Ms. Heard on the plane,... where she asked me over the phone if I thought I would be able to get my hands on MDMA, Ecstasy, as was her choice if drugs, MDMA and mushrooms. I texted Nathan Holmes, my other assistant at the time, and asked him if he could get hold of any Ecstasy and I also asked him if he could get cocaine for me. (p. 386)
- Ms. Lloyd was there to provide my meds, as it had not gone very well with Ms. Heard, so My. Lloyd travelled with me from that point on. (p. 387)
- I lived in the house when Ms. Heard was not there. There were two security guards just outside the front door of the house and then there were two other security guards at the gate, who would roam the property... and they were on 24 hours a day, yes. (p. 402)
- The house was stocked with provisions. ... There would be the chef, or the man who prepared the meals, there was a house manager that we had brought with us from England as well, and on a daily basis, Mr. Deuters, Mr. Holmes, Jerry Judge, Malcolm Connolly, they would have been in and out all the time. (p. 403)
- I believe it was 18 months [that JD hadn't been drinking.] ... It was most assuredly a minimum of nine months to a year, at the minimum. (p. 405)
- What was frustrating is that Ms. Heard was avoiding the pre-nup and the post-nup and rushing the wedding. (p. 412)

- ...March 8th, during the altercation with Ms. Heard, that happened in a matter of hours, not three days. (p. 415)
- [[photo](#) of writing on the mirror] "Call Carly Simon, she said it better, babe", ... That is Ms. Heard. I never saw that. (p. 426)
- I recall the mirror,... a wall,... a lampshade... (p. 428)
- reference to a [photo](#) of graffitied lampshade from 8. 3. 2105, 12:52 (p. 428) [[post quem non timing for the incident](#)]
- [graffiti were] not a long and drawn out process. It was not long before security was notified and help arrived. (p. 430)
- I have recently... found out that, yes, someone did push a record button on a telephone. ... For about **five hours**? Not that I am aware of. (p. 431) [parts of the cleaned recording were posted by [Incredibly Average](#)]
- ...where the speaking [and transcript] starts and it is actually 33 minutes into the tape. (p. 432)
- several minutes of the recording are on p. 434 – 440, 450 – 455
- That is pretty much where it started [the disagreement about the post-nup],... and then I called my attorneys. (p. 449)
- dr. Kipper's note: "At **11.30**, DN receives a text message from a client that he has been arguing with wife and that has cut his finger. According to patient, his assistant in security were on their way to pick him up" (p. 457) [[further post quem non timing](#)]
- reference to a long text from JD to dr. Kipper about AH from 8. 3. 2015, 1:05 local time (p. 459) [this is probably text no. 78 in this [pdf](#)]
- I can explain what the doctor said to me. He looked at me and said, "It is not, this was not done, your finger was not injured by a door. What actually happened?" I said, "It was", and he said, "It is impossible because **this is a wound of velocity**", is how he put it... (p. 468) [this was dr. Sauni(?), possibly the surgeon, on 9. 3. 2015]
- dr. Stephen Grant's note from 8. 3. 2015: "...more proximately suggested of a crushin mechanism." (p. 470)
- Dr. Kipper was well aware of what happened, as was Nurse Lloyd. ... I told dr. Kipper when he arrived at our house. (p. 472)
- [23 March 2015, Los Angeles, Staircase]
- And there were connecting doors that you had put in between PH3, PH4 and PH5 on the upper floors? -- That is correct. (p. 476)
- I did not have an affair with Rochelle [Hathaway]. (p. 480)
- [Ms. Lloyd:] "I was there at 1.30 [pm] to given him a shot. He said she was trying to start. He took his meds and went to bed. But then she found text to Rochelle and all hell broke loose. He and Travis get me back there around four. Good thing he called or they would have hurt each other. We had to physically restrain the both of them." (p. 485) [[so, AH was going through JD's phone?](#)]
- reference to transcript of **audio recording** between JD and AH regarding JD's drug use **from 26. 3. 2015**. JD does not know about it. (p. 486)
- I knew that the relationship would have a better chance of working if I resigned myself to doing the things tht would please Ms. Heard. (p. 490)

- [April 2015, train trip] There was one incident of, in our cabin. (p. 491)
- [15th December 2015, Headbutt]
- I did not know anything about that [hair being pulled out] until I had read her witness statement. (p. 496)
- reference to three photos ([F894.092](#), [F894.?](#), [F894.?](#)) of JD's scratched face taken by Sean Bett on 15. 12. 2015 (p. 497) [[photo 1](#), [photo 2](#), [photo 3](#) of JD's battered, scratched and bruised face from 15. 12. 2015; paparazzi video clip (not found again as of yet) and [photo 1](#), [photo 2](#), [photo 3](#), [photo 4](#), [photo 5](#) of JD and AH leaving Ago West Hollywood restaurant in LA from 15. 12. 2015, ≈19h]
- The bed was made of very, very heavy oak. (p. 500)
- My attorneys prepared the witness statements. I did not write these. I did not put them all together. I gave them the information and whatever went in them was written by my representatives. (p. 507)
- reference to an **audio tape about 15. 12. 2015 but which took place much later, after they were well apart and the divorce was imminent**: "I headbutted you in the forehead. How does that break your nose?" (p. 511 – 513) [this is the San Francisco day 2 recording from 22. 7. 2016. the '[headbutt](#)' clip (0:29) was transcribed by [Incredibly Incredible](#) on 14. 11. 2020.]
- I believe that Ms. Heard needed to build a team around her of her dedicated followers who were all scared to death of her. (p. 514)
- **10. 07. 2020 – transcript from court hearing ([UK10](#)) ✓**
 - [**Johnny Depp**]
 - reference to emails between iO and AH from 11. 2. 2016: "What the holy fuck happened this time?" ... "I thought you guys weren't seeing each other." -- "No, he didn't touch me." (p. 525)
 - [21th April 2016, Birthday]
 - **I believe I arrived around 10.15.** [22:15] ... They were still at the table, yes. (p. 529)
 - I left at 4.30 in the morning. (p. 538)
 - [21st May 2016, Divorce]
 - reference to text from JD to Christian Carino regarding AH from 4. 5. 2016 (p. 542) [Mr. Carino was AH's commercial agent at CAA]
 - JD's mother lapsed into a coma on 18. 5. and JD flew from London to LA on 17. 5. (p. 546)
 - On this particular occasion,... I asked them if they would wait outside the front door of penthouse 3 with the door unlocked, so that the second they heard screaming,... any sign, any screams, to please enter and stop what was happening. (p. 549)
 - I would say I was there for no more then 30 minutes. (p. 551)
 - I left around 8.29, 8.30. [pm] (p. 564)
 - reference to cctv footage of JD arriving and leaving (p. 565 – 566) [[combined footage](#) (0:39 and 0:49) was posted by Celeb Figure on 16. 7. 2020]
 - reference to text from JD to AH from 22. 5. 2015, early morning: "I'll never be able to understand how I fell in love with you. You are not her. I loved you more than anything. I did everything I could, but you never fucking loved me. It was merely

convenient for you. I hope our divorce goes as quickly as possible and that it is as painless as possible. Sorry you were as unhappy with me as you were. Obviously, the purity of whatever was has gone for a long time. I will miss the moments of beauty and truth. Goodbye, Amber." (p. 567)

- By June 4th, you had become very bitter towards Ms. Heard, had you not? -- I was feeling quite bitter, yes. -- [JD's text to Ms. Dembrowski from 4. 6. 2016]: "**I want her replaced on that WB film.**" (p. 569) [in contrast to JD just texting her sister, and according to Dan Wootton in *JK Rowling has a spectacular list of achievements to her name but her courage in defying the cancel-mob is her crowning glory* for [Daily Mail](#) from 4. 1. 2022, 17:36, both AH and Mr. Wootton attempted to have JD removed from *Fantastic Beasts*: "Both Amber and I offered to meet with Rowling separately to explain what we knew about Depp's behaviour, but she rebuffed our attempts to reach out." I do wonder, though, if JK Rowling and JD were that close, wouldn't she have at least mentioned this to him when it happened? and if she had any emails or texts regarding this, wouldn't she handed them over before the UK trial? cause that would have definitely torn a big hole in NGN's defense.]
- [July 2016, San Francisco]
- reference to [text](#) from JD to Mr. Carino from 15. 8. 2016: "I'm gonna need you texts about San Francisco..." (p. 571)
- [Mr. Carino] was present at the first meeting, yes. (p. 571)
- reference to audio recording from 22. 7. 2016 (p. 572) [this '[cut me](#)' (3:37) clip where JD begs AH to cut him was published by [Daily Mail](#) in '*Cut me wherever you want, or I will*': Court is played terrifying recording of Johnny Depp begging Amber Heard to slice him with a knife by Jack Wright on 10. 7. 2020, 16:40 GMT.]
- reference to ABC News profile programme (p. 574 – 575) [TV interview "*Johnny Depp. The ultimate outsider*" by Elizabeth Vargas for [ABC News](#) from 20. 6. 2003]
- reference to another article about the hotel room in 1994 [which I can't find]: "Depp's lawyer said the damage to the hotel room only amounted to about \$2,000, but that Mr. Depp agreeen to pay the larger amount to make up for leaving the hotel before his reservation was up." (p. [581](#) – [582](#))
- reference to [photo](#) of JD and Mr. Brooks from 2018, after the incident at the end of the night (p. 592)
- nurse Boerum's notes on AH from 2014: "Client discusses moving from Austin to Ne York when she was 17, to pursue a career in modelling. Moved to Los Angeles in her early 20s to continue her modelling career and pursue an acting career. Client states **she works on one to three films per year ... AH reports history of substance abuse, including an addiction to cocaine and liquor. Client reports abstaining from cocaine for a couple of years but was unable to report exact dates.** Client does not smoke cigarettes. **She reports consuming one to three bottles of red wine each day.** ... Client admits to a history of anxiety, eating disorder, bipolar disorder, insomnia..." (p. 596 – 597)
- report from nurse Lloyd to dr. Kipper from 2014: "Client AH has reportedly been experiencing increased anxiety and agitation recently and has had several outbursts of anger and rage. ...and expressed she had difficulty dealing with

feelings of insecurity and jealousy when not in the presence of her husband." (p. 597 – 598)

- reference to the kitchen cupboard smashing video, taken by AH without JD's knowledge or permission, in the kitchen of the Sweetzer, around the time of the filming of *The Lone Ranger* in 2013, because of the length of hair and the cowboy hat JD is wearing (p. 602)
- [a [low quality edited version](#) (1:37) was leaked by AH? to [TMZ](#) and published on 12. 8. 2016, 19:28 PT. another [edited low quality version](#) (1:30) was published by [Daily Mail](#) on 10. 7. 2020, 16:40 GMT. the [full version](#) (2:10) was shown by JD's legal team in UK closing submissions on 28. 7. 2020, p. 2546 – 2550 and posted on YT by [Arbuckling](#) (3:08, 14. 8. 2020, with commentary) and [Amber Turd](#) (2:04, 14. 8. 2020).][perhaps the clearest image of JD is at 2:15 of Arbuckling video, he has chin-length lighter brown hair and wears a black cowboy hat with two Native American-style patterned bands. JD sported the same look in May 2012 in Los Angeles when he arrived to *Jimmy Kimmel Live!*, see *Johnny Depp: Sexy Urban Coxboy* for [X17](#) from 9. 5. 2012, 10:55 PDT ([photo](#)), and a few days later in Tokyo during *Dark Shadows* press tour, see *Johnny Depp takes the cowboy look a step too far in Tokyo* by Rachael Wheeler for [The Mirror](#) from 14. 5. 2012, 12:41 ([photo](#)). he was also sporting the hat at *Damien Echols In Discussion With Johnny Depp* in New York in September 2012, see the series of images at [Getty Images](#) ([photo](#)), which actually took place during the filming of *The Lone Ranger*, see *Johnny Depp & Army Hammeer Do NOT Know Jo, Do You?* by Jo Mixon for [Angel Fire](#) from 7. 9. 2012 ([photo](#)), and see *Johnny Depp lends support to former West Memphis Three inmate he helped to escape Death Row after tragedy on Lone Ranger set* by Mike Larkin for [Daily Mail](#) from 22. 9. 2012, 5:46 GMT ([photo](#)). a few more pics from the filming of *The Lone Ranger* from this [forum](#), which were posted on 4. 9. 2012 when the filming concluded, but were taken during the filming: [photo](#) of JD with local actor Jachamoe Buzzell, [still1](#) and [still2](#) from JD's live stage performance with Gore Verbinski at the TLR wrap party in Angel Fire, NM. this is the only time that I could find JD wearing that particular hat. that was actually very early in their relationship and she is already secretly recording him?!]
- Is that the only time that you found out Ms. Heard was filming or recording you without your knowledge? -- No, that is not the only time. (p. 604)
- She complained that she needed more affection and she needed more attention... (p. 607)
- reference to emails between Mr. Holmes, AH and Ms. James with info directions to Hicksville on Thursday from 2013: from AH to her friends: "And please include in the email to bring some food, booze and drug of choice." (p. 620 – 621)
- [AH] said, when they broke up [with Ms. van Ree], she told me that Ms. van Ree had become quite upset, quite angry, and had changed the locks, and kept all of her furniture, all of he things, paintings, art, drawings, diaries, and that yes, she was having trouble with Ms. van Ree, she could not get her things out. (p. 630) [doesn't that sound incredibly familiar?]
- [officer Melissa Saenz]

- The 911 call was made and recorded in the New York Police Department. Do you know that? -- I did not know that. -- Was that information provided to you before your visit on 21st May 2016? -- No, it was not. ... It was a possible domestic incident, and the caller was a third party from out of state, and we were given an address, and the description of the word 'penthouse'. (p. 647 – 648) [ok, so the call from NY did come through at 20:30. what then was the second intervention?]
- [The apartments] were across the hall from one another. (p. 655)
- ...if I had to give a vague guess, I would say 30-60 minutes [we were in the building]. (p. 661)
- ...we have cctv evidence of you and Officer Hadden arriving at 9.04 [> 20:58] on the clock of the cctv in the lift, and leaving at 9.19 [> 21:13]. (p. 661)
- I searched the entire flat and there was no damage and there was no broken glass. There was nothing to report and nothing out of the ordinary. (p. 662)
- [Johnny Depp]
- reference to recording from the Boston flight, from 24. 5. 2014, 30s (p. 673 – 674)
- When we asked, we were told that we had been provided with it and when I [Mr. Sherborne] asked for a raw file, we were not given anything. ... It was a document provided by Ms. Heard to them [NGN's attorneys]. All we have in the metadata, rather strangely, is just was a year, 2014. [part of the recording (0:17) is at 0:30 – 0:47 of *Audio of Johnny Depp 'groaning' on private plane released by The Telegraph* from 9. 7. 2020]
- ...that was from when I was detoxing from the Roxys in 2014 on the island [in the Bahamas]. [this must be the reason NGN's side employed the forensic examiner, Mr. Latulippe, who confirmed the date and time, 24. 5. 2014, 21:00:03 – 21:11:42 local Boston time, from a forensic backup copy of an iPhone 4s belonging to Amber van Ree, p. 12-12 of his report ([NGN-OppForensEvid p. 52 - 70](#)).]
- [8th March 2015, Australia] ...that is where the argument was born, from a phone call to my attorneys, where I reprimanded them and the lawyer who Ms. Heard said had made her cry... (p. 686)
- Yes, it suddenly became that I, that I did not trust her and I did not love her enough and she was not in the will and we did not have credit cards together, etc. (p. 686)
- reference to texts between JD and Mr. Bettany from 18. 3. 2015: "...so just has the tip of my finger lopped off, as it happens,..." -- "Fuck me, how? Or perhaps not for text." Did you have any conversation with Mr. Bettany not on text about your finger? -- Yes, I did. ... I explained the argument and where it landed. (p. 688)
- reference to July 2016 recording (p. 689 – 690)
- The reference to throwing a mineral can? --- That was on the island in the Bahamas, not the time of the wedding, prior to that,... again, there was an argument, and she, there were oil painting material and she grabbed a can of mineral spirits... about 12 inches by four inches, and threw it at me and hit me just above the, right on the bridge of my nose. (p. 690)
- **12. 07. 2020 – Kate James' 2nd witness statement** ([KaJa 20-07-12 w2](#)); [listen](#) to it on Stevie J Raw's YT channel (28. 4. 2021) ✓

- 5. the rape story
- 6. In 2013, Ms Heard became aware of what happened to me... [She] then summoned me to her office where we sat on her couch and she questioned me about it...
- 7. On June 5, 2020, I received documents pertaining to my involvement on behalf of the Claimant in this case. ...much to my utter shock and dismay, I discovered that Ms Heard had in fact stolen my sexual violence conversation with her and twisted it into her own story to benefit herself.
- [this was broken to the public in *Amber Heard 'stole' my rape survival story and 'twisted it into her own story to benefit herself', says her fired personal assistant who says she was raped at knife point* by Vivek Chaudhary and Mark Duell for [Daily Mail](#) from 15. 7. 2020, 17:12 GMT]
- **12. 07. 2020 – Ben King's 2nd witness statement** ([BeKi 20-07-12 w2](#)); [listen](#) to it on Stevie J Raw's YT channel (9. 6. 2021) ✓
 - 1. I did also work for Mr Depp and Ms Heard in Vancouver in the Spring of 2016.
 - 9. I vividly recall that when they arrived at the house [in London in October 2014], they brought with them a relatively large number of cases of wine. I was quite surprised by this given what I had been told about the fact that Mr Depp was teetotal. [teetotalism is the practice or promotion of total personal abstinence from alcoholic beverages.]
 - 10. I can say that during their stay in London, I did not see Mr Depp drink. It was Ms Heard who was drinking the wine. I believe she would regularly drink at one or two bottles a night. ...even I was surprised by Ms Heard's consumption around Mr Depp.
 - 12. In hindsight... I was Ms Heard as the antagonist. Mr Depp seemed keen to walk out of, or away from, arguments. It appeared it was Ms Heard who would want to continue them and pursue him to do so.
 - 13. I want to make clear that I did not see any violence at any time.
 - 18. [March 2015, Australia] I arrived at the house on 8 March 2015, shortly after Mr Depp had been driven away.
 - 19. ...there was a considerable amount of damage, particularly to the bar area on the lower ground floor.
 - 20. The immediate physical damage was tidied up, such as broken glass, paint, blood, liquid spillages and broken china where a cup had struck the TV. I also cleaned graffiti from the mirrors. [huh, so, graffiti were cleaned on the 8th already. AH must have then taken photos soon after she added her writing.] I was there for several hours. ... and on the staircase down to the bar, where a flower vase had been launched from the kitchen area above. [is this the vase mentioned in the 25th September 2015 recording: [part 1](#) (1:05:07) and [part 2](#) (59:35), transcript [part 1](#) and [part 2](#)]
 - 21. I exhibit... a photograph which I took that afternoon on 8 March 2015 of the bar area. ... I did not see any phones that had been broken.
 - 22. A lot of the damage was paint and blood around the house. ... there were no urine stains... I did not smell it...

- 23. Also, none of the doors inside the house were damaged or any locks on doors which had them. ...the bar area where I found the fingertip.
- 24. I did not see any injuries on Ms Heard when I saw her that day. She was certainly very hysterical and emotional, but there was no sign of any physical injury. ... [on the plane back to Los Angeles] I did notice on one arm that she had a couple of marks which were looked like cuts in fairly uniform lines at a sort of diagonal angle downwards.
- [photo](#) of smashed glass and wall from Australia's home from Mar 2015 (p. D249) [note that the phone sits perfectly undamaged on the marble countertop, and that there are blood drops on the floor, but no smears or indications that something or someone was dragged.]
- 13. 07. 2020 – transcript from court hearing ([UK13](#)) ✓
 - [[Johnny Depp](#)][March 2015, Staircase]
 - I flew back from Australia to Los Angeles to have surgery on my finger. At that time, they had put a pin in it, in the broken bone, the fractured bone, but to no avail, and then I ended up getting MRSA from it. (p. 696)
 - reference to [photo](#) of JD's dinosaur cast, F894.069, from 18. 3. 2015 (p. 696 – 697)
 - note from nurse Boerum from 21. 4. 2016: "Client's husband, JD, arrives at 10.15." ... She says you appear coherent, oriented and sociable. ... "Client appeared to be cordial... and escorted guests to the door around midnight", 12.30. (p. 718)
 - reference to [photo](#) of JD asleep holding ice cream, from Boston, from 2014: AH asked JD to hold a tub of ice cream, JD fell asleep after a long day at work, AH took photo and showed JD the next day, accusing him of being "pathetic" (p. 728)
 - Did Ms. Heard ever show you any photos of any injuries to her the next day, that had supposedly happened, to demonstrate what you had done? -- No, sir. (p. 728)
 - [[Stephen Deuters](#)]
 - reference to [photo](#) of a bible with cocaine lines on top, from 22. 6. 2013 (p. 744)
 - reference to [photo](#) of JD asleep/passed out on the floor of a hotel room, from 18. 7. 2013 (p. 745) [I'm not sure which direction is the correct one, but this photo has a lot of background]
 - [JD] would drink, but he would not get drunk, which was always remarkable, we thought remarkable. (p. 751)
 - reference to article *Johnny Depp assistant says texts were doctored* for [TMZ](#) from 2. 6. 2016, 11:18 PT (p. 792 – 793)
 - I never spoke to TMZ. I never had a conversation with anyone about these texts outside of Johnny's then counsel. (p. 793)
 - reference to two [photos](#) of JD asleep with ice cream from 7. 8. 2014 (p. 807 – 808) [JD disputed the date, saying it was earlier that year in Boston, p. 728 of transcript; this [photo](#) even has AH as the one who took it.]
 - Mr. Deuters travelled to Australia on 11. 2. 2015 (p. 816)
 - text from JD to Mr. Holmes regarding Disney: "Honestly, I will not again be doing anything that involves the discussion of furthering my embarrassment of having whored for all these fucking wasted pieces of shit, nothing years on characters so that I ignorantly started to think of as my legacy. Every cuntin' fight, every fucking

time, I held my ugliness and rage deeper down and get in check when there was still room in my head to do such a thing." (p. 817 – 818)

- He did not say that Ms. Heard had injured his finger [in March 2015]? -- No. He said that Ms. Heard had injured his finger. (p. 826)
- April and May [2015]... was a happy time for Mr. Depp and Ms. Heard... (p. 830)
- text from personal friend Bugle to Mr. Deuters from 1. 6. 2016: "Colleen lived in the apartment next to Tasya and Amber in Puerto Rico and says they constantly heard screaming fights which were so loud, vivacious and frequent that it was a real problem being their neighbours." (p. 833)
- You said that you did not see [JD] take drugs for eight, the first eight years? -- At least, yes. -- ...that takes us to about 2012; is that right? -- Yes, it was summer 2012. (p. 837) [how interesting. why did JD go back to drugs? AH's influence?]
- ...as though he started to rely on medication. He... became more and more sad, quite depressed and I feel it was because of the relationship he had entered into at the time [with AH], and the effect it was having on him. (p. 837)
- I think they were two people that were in love with each other that, you know, should not have been together. (p. 856)
- [my general observation of Mr. Deuters is how little he remembers. didn't they prepare him? gave him some context? told him to try to remember more details? at least in regards to specific incidents? I find that odd.]
- [Edward White]
- [AH] received \$7 million of tax-free income. She also received the full satisfaction of her legal fees, which was approximately \$525,000 and she was relieved of all her [tax] liabilities [a very substantial amount, many millions of dollars] to which she was the subject. (p. 869) [so, she actually benefited a lot more than just \$7m]
- It is my recollection that she represented she would in fact make contributions to these two organisations [CHLA and ACLU]. During that time I suggested to her she did not need non-taxable income if she is going to give a corresponding tax deduction, but she insisted on it being proceeds being free of taxation. (p. 871)
- On occasion I asked the question, were the contributions made and I never received a response. (p. 871)
- Did you make the enquiry of the charities themselves? -- No. (p. 871) [interesting that Ms. Wass is asking these questions if AH's charitable donations were not relevant to the case.]
- [Trinity Esparza]
- No, [AH] never wore makeup. ... Only for when she was like going to [unclear]... (p. 882)
- She had a very dewy glow. I am a woman. I wear makeup. I know the difference when someone is wearing makeup or not wearing makeup. (p. 885)
- reference to F894.236 photo of AH without makeup with a faint red mark from 27. 5. 2016 (p. 887 – 888)
- I know that he [Mr. Musk] left the building and she [AH] came downstairs and I saw her and she did have some marks that were visible. I do not know where they came from, but I did see them. (p. 893)

- **14. 07. 2020 – transcript from court hearing ([UK14](#) / [UK14](#)) ✓**
 - [[Malcolm Connolly](#)]
 - ...Hicksville incident in June 2013 ... was raised in March of this year [2020]. (p. 901)
 - ... Asian train journey ... was in July 2015? -- Correct. (p. 908)
 - text from Mr. Connolly to AH from 6. 2016: "...He is still trying to protect you, Amber." (p. 911)
 - [March 2015, Australia]
 - Dr. Kipper was not in the house when I extracted Johnny from the house. (p. 919)
 - reference to the [Australian recording from 8. 3. 2015](#): it was recorded at the house, it is five hours long, participants are AH, JD, dr. Kipper, nurse Debbie Lloyd, Jerry Judge, Ben King (p. 928 – 9) [part of the cleaned recording was published by [Incredibly Average](#) (19. 4. 2020, 36:53, at 3:49 – 32:54)]
 - reference to Mr. Judge's speech about AH from the recording from 8. 3. 2015: "She's got a bruise here, she's got a bruise underneath. ... She hit him. She slapped him yesterday." (p. 937) [[that must refer to 7th March](#)]
 - ...the Singapore trip, or the [trip to south-east Asia was around the 27th of July](#)... (p. 938)
 - reference to entry from AH's diary from 27. 7. 2015 (p. 939 – 940)
 - reference to the [Australin recording, which was "left on by Ms. Heard in Australia for several hours"](#) (p. 945) [relevant part(s) of the cleaned recording was/were posted by [Incredibly Average](#) (19. 4. 2020, 36:53, at 3:49 – 32:54)]
 - reference to texts from JD to Mr. Connolly from ?: "Please get her out of this room now. She struck me about ten times, can't take any more." (p. 953) [[a new incident?](#)]
 - [[Tara Roberts](#)]
 - [Christmas 2015 was that argument when JD got a gush on his forehead](#) (p. 968)
 - [the gash] had broken the skin [of JD's nose, but was not bleeding] (p. 969)
 - the fight... took place on [29th December](#)...? -- Yes. (p. 970)
 - [[discussion about divorce settlement and charities](#)]
 - discussion about AH's divorce settlement and how much she did not get: "it is not even on the periphery of the case, not even part of the case" by Mr. Sherborne (p. 977 -) [[which, in hindsight, was an unfortunate statement](#)]
 - [[Samantha McMillen](#)]
 - [well, respect to her, she did not let Ms. Wass push her around]
 - ...you are in Mr. Depp's house in West Hollywood [on 24th May 2016] and Ms. Heard turns up, she does not know you are going to be there, does she? -- No. (p. 1037)
 - [[Hilda Vargas](#)]
 - You had never known either dog to defecate in the bed...? -- No, never. -- ...they could not jump on to the bed. (p. 1053)
 - We had arrived at around 3 p.m. ... Those faeces were fresh, I mean, like from the night, or from the early morning. (p. 1054)
- **15. 07. 2020 – transcript from court hearing ([UK15](#)) ✓**
 - [[Ben King](#)]

- And the Depp household returned to Australia on 21st April? [2015] -- Right. (p. 1103 – 1104)
- They were quite open, they had their dogs with them, and their dogs were not hidden from public view? -- They arrived at the house with the dogs, yes. (p. 1105)
- The bar area, of course, was probably the most [blood], and then there was a trail of blood spots up the stairs and there was one bedroom at the end of the long corridor upstairs that perhaps had more than other bedrooms. But there were a couple of bedrooms with blood spots in, one bed probably had--- (p. 1120)
- She was in the bathroom for a period [this is before the second take-off in Sydney], which I believe she was making a phone call. (p. 1122)
- [Kevin Murphy]
- Mr. Murphy,... you did make a statement to the Australian court, to be submitted..., dated 13th October 2015, which you signed... (p. 1146 – 1147) [then large portions of this statement are read out on p. 1147 – 1154]
- Johnny never wanted the dogs to travel. It was only Amber that wanted the dogs to travel. (p. 1149)
- I think that is the way that it is written for me by Marty Singer of Amber Heard. (p. 1154)
- In conversation with me Amber had explained that it was her idea to place the blame on Kate, and she was no longer working here. However, as things progressed, and the charges in Australia were so severe, that she also needed additional back-up, and that was me. So, I believe that she targeted Kate first and then I was second. (p. 1154 – 1155) [this might be a rare insight into AH's calculating mind]
- reference to a video clip [probably the [apology video](#) which they recorded for Australian Department of Agriculture, Water and the Environment to help AH get out of being charged] (p. 1158)
- reference to a different video clip (p. 1158)
- reference to a text from JD to AH from 20. 4. 2016: "How many times can I be apologised for the same fucking thing. What is it with you? I've been by your side for every drama, illness and ugly situation. How do you think the goddamn felony charges went away?" (p. 1159 – 1160) [these are Australia charges, the court decision was two days prior]
- Can you confirm that the Australian case was concluded on 18th April 2016? (p. 1160)
- I mean, even in the clip, he seemed very angry at the cabinets and then I think he was angry at Amber for trying to film him. (p. 1161)
- [15th December 2015, Headbutt]
- I, along with another co-worker, turned up -- I picked up the racks and put them back where they were. (p. 1173)
- I believe it was in the morning [that Mr. Murphy was at the Eastern]. (p. 1181)
- I saw one tuft of hair. (p. 1182)
- reference to texts between Mr. Murphy and AH regarding Boo from 10. 2014: "Last night she shit on Johnny while he was sleeping, like all over him, not exaggerating

- and I hate to keep punishing her when she seems not to be able to remember." (p. 1184 – 1185) [I'm a little surprised she did not take photos of that situation]
- reference to texts between Mr. Murphy and JD from 2019: "I'll always have your back, any time, anywhere. Continued relentless exposure of the fraud and the scammer bandits is key" ... "Her photo shows an unmade bed, no black duvet. ... Her depot photos are different from my dated, time-stamped and location-stamped photos. ... I have two photos that directly conflict with her depot photos. ... Amber would be hard-pressed to explain how that bed got fitted with a duvet, particularly when her alleged evidence (hair) was at the foot of the bed and the broken piece of wood of the bed is exactly the same location as my pic. She told me nothing was touched between the time of my photo and hers. Her alleged photographic evidence is in the same location as my pics. However, she/they felt a need to make the bed with the duvet. Don't think so. Amber never made a bed." (p. 1189 – 1192) [he must be talking about the [hair photo](#) and the [bedframe photo](#), the one in the sequence from the photo gallery, from his witness statement.]
 - Well, knowing Johnny like I know, he felt that it was not only a fraud against him, but a fraud against women in general. ... She has no thoughts of other humans... (p. 1194)
 - [Kate James]
 - [the one-liner from the filming of The Adderall Diaries] was more of an insurance policy because she had a history with James Franco that was negative, at least she described it that way. She described him as being sexually aggressive towards her in a previous film they had done together. (p. 1217)
 - reference to text from JD to Ms. James from 13. 8. 2016: "Thank you sweetheart. I'm disgusted that I ever fucking touched that scum. Back on Tuesday and then court." (p. 1219 – 1220)
 - [24th May 2014, Boston plane]
 - reference to texts from AH to Ms. James from 24. 5. 2014 (p. 1224 – 1225)
 - ...she had her own apartment that was still being paid for and maintained by Mr. Depp, which was on Orange Avenue. (p. 1225) [well, I suppose that answers my questions whether AH was paying any of the expenses for the household-keeping; anywhere, apparently. financially independent much?]
 - Yes, she went to The Chateau with four of her friends and they basically had a pool party all day. (p. 1226)
 - Yes, because I was using a phone that was logged into her iCloud account, so I could update her calendar, and then when she terminated my employment, she deleted all of the texts out of the Cloud, any texts that were abusive. (p. 1232) [could some of those texts be retrieved via forensic imaging?]
 - She [AH] was probably the least known person I have ever worked for in Hollywood, to be honest. (p. 1233)
 - so, NGN would like to get JD's earnings and deductions for 2015 and 2016 (p. 1243)
- 16. 07. 2020 – transcript from court hearing ([UK16](#)) ✓
 - [Sean Bett]
 - Mr. Bett started at the LA Sheriff's Dept in 1990, not 1999. (p. 1251)

- photo of JD's injury in Mr. Bett's witness statement cited in par. 8 was not taken by him, but is very similar to a photo he has taken.
- The guard shack [at the Sweetzer] had several... cctv cameras..., where you could monitor the street, the property and so forth. (p. 1259) [and the existance of this footage was debated a few times, I think]
- ...I was there at the majority of them [the arguments], at the end. (p. 1262)
- ...you were sent this photograph by one of Mr. Depp's attorneys... Adam Waldman? [the original photo from his witness statement which was not taken by Mr. Bett] .. That is correct. ... It was taken on my telephone or perhaps on Mr. Depp's telephone. ... I did not find it [on my iCloud]. So... I thought I believe it was then taken with perhaps Mr. Depp's phone, but I could not find the actual photo that I took on the night of April 21th. (p. 1269 – 1270)
- ...the [photograph](#) which we... still have in front of us with the date of 23rd March. (p. 1272) [so, this is a photo of JD's swollen cheek from the Staircase incident on 23. 3. 2015 and therefore the photo in Mr. Bett's 1st witness statement, and it looks very similar to the photo Mr. Bett took of JD on 21. 4. 2016 which can't be located anymore because Mr. Bett has changed several phones since then. okay. the 23. 3. 2015 photo is a screenshot with caption West Hollywood – Sunset strip and date March 23, 2015 11:37 AM. the screenshot was taken on Friday, 3. 7., 13:47. 3rd July was Friday in 2015 and in 2020.][for closest dated photo to March 2015 bruise I found this [photo](#) of JD and AH arriving at Brisbane airport posted on 17. 4. 2015 in The Telegraph. unfortunately, not much can be seen.][the April bruise disappeared by the time of the Photocall on 8. 5. 2016 ([photo](#), [photo](#)) and the European premiere of *Alice Through The Looking Glass* in London on 10. 5. 2016 ([photo](#), [photo](#))]
- I have taken other photos of him with injuries that I have submitted to the attorneys. (p. 1273) [have we seen them? one is this [photo](#) of JD in what look like to be the same clothes as in 23. 3. 2015 photo.]
- [21th May 2016, Divorce]
- [in PH3] ...music was playing low, candles were lit, there was a bottle of wine open, there was some wine in a glass, and I believe there might have been a glass next to that said glass that was full of wine. (p. 1276)
- The times are approximately 7.00 to 7.30... [of their arrival] (p. 1276)
- Your account is that they were only inside together without you and Mr. Judge for ten minutes? -- Give or take, correct. (p. 1278)
- reference to **cctv footage of JD and security arriving at 19:02:37 [> 18:56]** (p. 1280) [but JD's side does not accept that that is necessarily the right time, because the timings on cctv footage can be out up to a certain period of time. oh? I didn't know that. compared to other camers, the elevator camera 2 is in fact late by about 6 mins. the [combined footage](#) (1:29) of the elevator was published in *CCTV shows Johnny Depp in 'extremely agitated' state in lift after he was 'suhered out of couple's LA penthouse following blazing row with Amber Heard* by Mark Duel and Vivek Chaudhary for [Daily Mail](#) from 16. 7. 2020, 14:28 GMT]

- reference to [cctv footage of JD and security leaving at 20:28 – 20:29:06 \[> 20:22\]](#) (p. 1282) [video (1:29) of combined cctv [footage](#) was published in *CCTV shows Johnny Depp in 'extremely agitated' state in lift after he was 'suhered out of couple's LA penthouse following blazing row with Amber Heard* by Mark Duel and Vivek Chaudhary for [Daily Mail](#) from 16. 7. 2020, 14:28 GMT. [footage](#) (0:46) of them just leaving is also on [deppdive](#).]
- reference to newspaper printout *UC Irvine Professor can seek damages from Johnny Depp in concert scuffle* for [LA Times](#) from 2. 11. 2012, 10:47, about a court case from 2012, involving JD and Mr. Bett, where a woman, Ms. Robin Eckert, complained that she had been injured by JD's bodyguards at an Iggy Pop concert, the complaint was filed on 16. 4. 2012 (p. 1294) – this is the case Jane Doe vs Johnny Depp
- reference to F894.092 [photo](#) of JD's injury on the top of his nose by Mr. Bett on 15. 12. 2015 (p. 1306)
- reference to F894.093 [photo](#) of redness around JD's eyes and a vertical scratch, and redness to the right of the scratch, by Mr. Bett from 15. 12. 2015 (p. 1307)
- reference to F894.094 frontal [photo](#) of the scratch on the top of JD's nose and redness on the side of his right cheek by Mr. Bett from 15. 12. 2015 (p. 1307 – 1308)
- Mr. Depp told me that Ms. Heard slapped him in the face a few times. (p. 1308)
- [\[Starling Jenkins\]](#)
- 21st April... Did your shift that night end at about 11 o'clock? -- Yes. (p. 1327)
- ...the following day, [he spent] three and a half hours [looking for JD's phone]. (p. 1328) [\[AH's texts to Mr. Jenkins from 22. 4. 2016, 8:37 when she was trying to locate JD's phone.\]](#)
- reference to a [group photo](#) of friends going to Coachella by Mr. Jenkins from 23. 4. 2016: ?, striped shirt, AH, Ms. Pennington, male friend, stylist, Ms. Henriquez (p. 1337)
- **16. 07. 2020 – NGN's letter of instruction to Timothy James Latulippe**
- **17. 07. 2020 – Jeffrey Smele's 3rd witness statement (JeSm 20-07-17 w3)**
- **17. 07. 2020 – NGN's application for permission to adduce expert evidence**
- **17. 07. 2020 – transcript from court hearing ([UK17](#)) ✓**
 - Last night, shortly before 10 to 10, the defence received a bundle of disclosure electronically, which had to be opened with a password, comprising 103 documents, including **13 videos**. (p. 1347)
 - ...the picture was created on 8th March [2015], at 12.38 p.m., and on the top left-hand corner of the screenshot is the date Friday, 3rd July [2020], 1.44 p.m. (p. 1347 – 1348)
 - [\[Isaac Baruch\]](#)
 - Mr. Depp invited you to live at his Hollywood residence in Sweetzer Avenue, after you left the Eastern...? -- I live in a room in one of the houses that he owns on that street. (p. 1362)

- No, she was worried about herself not being able to get in touch with him. [after an argument when JD left, perhaps these [texts](#) from AH to JD reflect that (from after the wedding)] (p. 1363)
- March 2013 is when I first met her [AH]... (p. 1372)
- reference to texts between Amanda de Cadenet and AH from 22. 5. 2016: "Make sure you have photos of the injuries, please, and text them to me or Rocky so there is a record." (p. 13769)
- ...and everybody enjoying what Johnny was funding, yes. [at the Eastern] (p. 1381)
- I saw him [Mr. Musk] twice around the building and it was after May 21st [2016]. (p. 1383)
- [JD] is a true, honest man, who is an openly good guy. He does the right thing. He knows how to do the right thing and you know, someone you want to, you know, you want to care about because he does the right thing. (p. 1385)
- Johnny is paying for everything. [at the Eastern] (p. 1387)
- [Alejandro Romero]
- [AH] was not resident [of the Eastern] until March 2016? -- Her name was not in the system, we do not consider persons their names are not on the system a resident. (p. 1399)
- [Travis McGivern]
- [22th March 2015, Staircase][new version of events!]
- Nurse Lloyd stayed downstairs with Ms. Heard, who was at the front desk [in the lobby]. I got in the elevator, went up to the penthouse levels by myself, to meet with Mr. Depp. (p. 1411)
- I think... when Ms. Lloyd and Ms. Heard came back upstairs to the penthouse level, I was with Mr. Depp, we were attempting to leave, they engaged in a discussion or argument, we all entered Penthouse 5 together, Nurse Lloyd, Mr. Depp, Ms. Heard and myself, and that is where the argument escalated. (p. 1413)
- reference to text from Ms. Lloyd to Mr. Deuters about the Staircase incident "last night" from 23. 3. 2015 (p. 1418)
- [this is about Mr. Latulippe's letter which predates the forensic report but contains analysis of at least May 2016 photos] ...it relates to metadata... which was disclosed... by the claimant in January of this year. ... the claimant... told us they are challenging the authenticity of the images which they themselves disclosed to us. ... As I have understood it, what was disclosed in January by Brown Rudnick were material that had been produced by Ms. Heard in the American libel proceedings. ... on Friday [10. 7.]... we obtained the documents and the correct metadata from Ms. Heard and wrote to Schillings... ...had gone back to the digital documents disclosed by Brown Rudnick... and realised that embedded within those digital documents was the original metadata of the images and that metadata exactly matched the metadata which had been provided by Ms. Heard... -- We do not dispute the accuracy of the date/time metadata. [but] We do not accept that the May 2016 images have not been edited or otherwise manipulated... Some files have edited in the file name. --- ...the letter from Mr. (unclear)... explains the two types of metadata... in relation to the May 2016 images, or most of them. ... the

- pictures do not appear to have been altered or manipulated in any manner. (p. 1437 – 1447)
- [Laura Divenere]
 - reference to a [text/text/text](#) from Mr. Waldman to Ms. Divenere regarding her deposition from 22. 6. 2019 (p. 1462) [Ms. Divenere's [declaration](#) was signed on 28. 6. 2019]
 - Did you forward that text to Ms. Heard? -- Yes. (p. 1462)
 - reference to the [audio recording of Ms. Divenere and AH](#) after AH received the forwarded text from Ms. Divenere, recorded by AH in secret, [from 2019](#) (p. 1462) [the recording was made after Ms. Divenere signed her deposition on 28. 6. 2019 and probably after she called and texted AH for a meeting on 16. 7. 2019 (p. 1462 and 1473 of the UK court hearing from 17. 7. 2020, [UK17](#)). Mr. Waldman's changing [comment1](#) and [comment2](#) in the press about the declaration and the recording. [transcript](#) was published by Eriq Gardner from The Hollywood Reporter.]
 - ...throughout the time that I was with Amber, most of the summer, she had clearly been upset,... I attributed it to crying and her face red and puffy, but again I did not see any – the way that Mr. Waldman was describing it,... it would be very visible to me that it was an injury, and I do not recall see that. (p. 1466)
 - reference to a [text](#) from Ms. Divenere to AH from 16. 7. 2019, after the call [from her to AH] (p. 1469)
 - Did she [AH] ask you to come and see her? [after the forwarded text and before the recording] -- She did. -- Is that because she had heard about the declaration? -- Yes. (p. 1473) [[the recording was therefore made after 28. 6. 2019, probably after 16. 7, so the second half of July?](#)]
 - [Ms. Divenere was very reluctant with her UK witness statement and/or live testimony. NGN's lawyer Ms. Robinson's [email1](#) and [email2](#) to Ms. Divenere's attorney Mr. Sherman from 2. 3. 2020. Mr. Sherman's [email](#) confirming the declaration is truthful and accurate, and that Ms. Divenere doesn't want to testify, from 10. 3. 2020. Mr. Sherman was present at the testimony.]
 - [Katherine Kendall]
 - The #MeToo movement was generated after allegations of a very serious nature were made against Harvey Weinstein in October 2017; is that correct? -- Yes, that is correct. (p. 1491)
- **18. 07. 2020 – Edward White's 2nd witness statement** (EdWh 20-07-18 w2)
 - **19. 07. 2020 – digital forensic report of Timothy James Latulippe** is attachment 9 in AH's opposition to JD's motion to compel production of original devices and operating system drives and cloud backups of these original devices as requested in JD's 7th RFPs from 22. 10. 2021, p. 52 – 70 of pdf ([NGN-OppForensEvid](#)) ✓
 - I was instructed ... to address issues relating to the veracity of certain graphic image files and one file recording: May 2016 Images, December 2015 Images and Boston Plane Audio Recording, respectively. (p. 3)
 - [I was instructed to assess whether metadata were edited, modified or otherwise manipulated, modified or otherwise manipulated, rather than a question of the](#)

photos themselves showing evidence of edits, enhancements or manipulation. (p. 3)

- As it relates to a photograph from 21th March 2013 titled, "13.03.21 AH.jpg" disclosed Friday, 10th July, this shows a time of 6:31 AM. A copy showing the same photograph dated 21st March 2013 and 11:31 PM can be explained as a time zone discrepancy. [which photo is that? why would there be a time zone discrepancy?]
- [May 2016 photos]
- In May 2016, that operating system would have been the Apple iOS version 9.3.1 [released 16. 9. 2015].
- Five photos were found by Mr. Latulippe to have metadata and third party metadata inconsistencies: F894.165 [photo] (visually duplicative with F894.167 [photo] without inconsistencies), F894.173 [photo] (visually duplicative with F894.175 [photo] without inconsistencies), F894.191 [photo], F894.216 [photo] and F894.218. ... These inconsistencies included missing geolocation metadata, incorrect software metadata that doesn't conform to Apple iOS version 9, and addition of third-party metadata fields. (p. 7)
- He examined a forensic image of an Apple iPad Pro 10.5" belonging to AH and a forensic image of an Apple iPhone X belonging to AH. (p. 7)
- I extracted unedited copies of four of these five images. Note: Photos from the iPhone X were created on the on or after 20th July 2018. As such, any editing of the trial bundle versions would have been on or after 20th July 2018. Photos from the iPad Pro 10,5" were created on or after 6th October 2018. As such, any editing of the trial bundle versions would have been on or after 6th October 2018. [it's interesting these important remarks are only in the small print on the bottom of the page.](p. 8 and notes 7 and 8)
- [December 2015 photos]
- Photos from 12. 2015 were taken on 16. 12. (14 photos, two at 10:41, three at 10:56 – 10:58, two at 11:44, and seven at 14:39 – 14:41), 17. 12. (7 photos, four at 00:46 and three at 10:19 – 10:20) and 18. 12. (1 photo, at 14:40). (p. 9) [none were taken on 15. 12. 2015 as they testified! isn't that interesting.]
- 20 out of 22 photos have metadata and third party metadata inconsistencies! The only two without inconsistencies are F894.112 and F894.114. These inconsistencies included missing geolocation metadata, incorrect software metadata that doesn't conform to Apple iOS version 9, and addition of third-party metadata fields. (p. 10)
- The operating system for December would have been Apple iOS version 9.2. (p. 11)
- I extracted unedited copies of 18 of these twenty images. Note: Photos from the iPad Pro 10,5" were created on or after 6th October 2018. As such, any editing of the trial bundle versions would have been on or after 6th October 2018. (p. 11)
- [Boston Plane Audio Recording]
- The audio file was created on 25th May 2014, 02:11 UTC. It is 11 minutes 29 seconds long. The audio track began recording on 24th May 2014 at 21:00:03 Boston time ... this becomes 25th May 2014 at 02:00:03 UTC. [therefore, the recording was made on 24th May 2014, 21:00:03 – 21:11:42 local Boston time.] (p. 12 – 13)

- I was able to locate a historic copy of the audio recording on a forensic backup copy of an iPhone 4s belonging to Amber van Ree. [this means the phone was registered on that name?]
- list of May 2016 Images (p. 17)
- list of December 2015 Images (p. 17 – 18)
- [analysis of December 2015 titled *Manipulation of Photo Metadata – Incident-12* by Andy from London has been streamed live by SEC, Stevie J Raw, Come Geek Some, and Doctor Soup then uploaded by SEC in several installments: [part 1](#) (*Amber Heard Photos, Manipulation and Cover ups?*, 23. 11. 2021), [part 2](#) (*Does Amber Heard Have Flawed Metadata?*, 24. 11. 2021), [part 3](#) (*The Examination of Amber Heard Photo Metadata*, 28. 11. 2021), [part 4](#) (*Amber Heard – Metadata Doesnt Lie*, 1. 12. 2021), [part 5](#) (*When Did Amber Heard Take Photos of Injuries?*, 3. 12. 2021), [part 6](#) (*Investigation Into Amber Heard "Hair Picture"*, 7. 12. 2021), [part 7](#) (*Amber Heard, Her "Evidence" Is Falling Apart*, 8. 12. 2021), [part 8](#) (*Did Amber Heard Use A Prop for Her Pictures*, 17. 12. 2021). further analysis by Andy titled *Johnny Depp v Amber Heard Corden Show Photo Analysis* [part 1](#) (19:39) and [part 2](#) (13:06) was posted by Stevie J Raw (31. 1. & 1. 2. 2022)]
- [analysis of four May 21st and 22nd photos, comparing background, eyebrows, clothing, hairstyle, jewelry, and bruising was made by Andy and posted by SEC as *Amber Heard Injury Photos Debunked* in [part 1](#) (14:29; 3. 2. 2022), [part 2](#) (14:45; 4. 2. 2022), [part 3](#) (12:29; 5. 2. 2022), [part 4](#) (12:32; 6. 2. 2022), [part 5](#) (16:03; 8. 2. 2022). it was also streamed as [part 1](#) (1:54:25) *New Bombshell Amber Heard Evidence analyses!* by Doctor Soup (2021) and [part 2](#) (4:03:21, with relevant parts with the document at 58:58 – 1:19:53 & 1:56:27 – 2:56:45) *The Andy Files! RIP Betty White. New Years Eve Live!* by Come Greek Some (31. 12. 2021)]
- **20. 07. 2020 – transcript from court hearing (UK20) ✓**
 - [application about the expert forensic analysis]
 - [JD's] expert was asked at very short notice to deal with what the application notice said. (p. 1502) [there is / should be / was never made another forensic report on May 2016 photos?]
 - ...we [NGN's counsel] have offered a copy of the mirror image phone [probably meaning the forensic imaging of AH's phone] [to JD's counsel] (p. 1505) [not used if the forensic imaging has actually been exchanged?]
 - Secondly, Mr. Heaway [sp?, he is JD's forensic expert] has obviously done quite a lot of work already. ... He has the metadata. He had been offered the mirror. (p. 1506)
 - [NGN's counsel] offered to provide the hard devices we were suddenly told are in their possession, but obviously come from Ms. Heard. ... not the original ones but the original ones have somehow disappeared, but the later devices on which these images and the metadata have been found... (p. 1509)
 - [Amber Heard]
 - [and can I just say that Ms. Laws is amazing at dealing with her]
 - reference to F894.261 and F894.261A [photo](#) of a marble top with a credit card and white powder lines, according to AH from 8. 3. 2013 [sic!] (p. 1520 – 1521)

- reference to F894.262 [photo](#) of a glass table, according to AH from 22. 3. 2013 [sic!] (p. 1520 – 1521)
- reference to F894.263 and F894.263A [photo](#) of a glass table and a box property of JD, according to AH from 22. 3. 2013 [sic!] (p. 1520 – 1521)
- When you first started your relationship with [JD],... you had your own property in Orange Drive...? -- I rented a home, yes. (p. 1523)
- ...you were being asked to sign a pre-nuptial agreement, were you not? -- No, I was not. (p. 1527)
- reference to email from dr. Cowan to dr. Kipper from 27. 1. 2015: "Amber and JD have been fighting non-stop since he confirmed his need for a pre-nup on their way to the airport going to Japan to promote his movie. She tried to push up the date of the wedding to avoid all this, but the reality is he'll need a pre-nup. If she fails to sign, they won't get married. Both behave like supert triple D types." (p. 1527 – 1528) [[so this is incident 7, Tokyo](#)]
- ...I feel it should be clarified on the record... that... dr. Kipper was mistaken when he said that I tried to move the wedding date up. (p. 1532) [this is after two or three extra stories with little straight answers, and it continues like this to the end]
- reference to text between JD and Ms. Dembrowski from 31. 1. 2015: "Cool, but it must be explained to her by her attorney and MOST IMPORTANTLY that she should not think that this is an abnormal practice." -- Ms. Dembrowski responded that you both agreed to sign a post-nup... (p. 1533 – 1535)
- You have said that your drinking and the taking of controlled [illegal] drugs was not toxic. Do you agree? -- I do. (p. 1539)
- reference to a note from nurse Boerum who has got info from dr. Kipper (?) from 8. 2014: "Client admits to history of anxiety, eating disorder, ADHD, bipolar disorder, co-dependence issues and occasional insomnia." ... Were those observations correct or incorrect? -- They are incorrect. -- "AH reports history of substance abuse, including an addiction to cocaine and liquor. Client reports abstaining from cocaine for a couple of year but was unable to report exact dates." Was that true? -- No. (p. 1541 – 1542)
- I am going to suggest that you were receiving medication and treatment and a variety of pills before you even met Mr. Depp. [because she is saying that dr. Kipper had her on a long list of ever changing medications] Do you agree or not? --- No, I was on one medication. ... It is called Provigil, it is prescribed for narcolepsy and sleep pattern disruption. (p. 1546 – 1547) [[this must be one of the things JD's team is after, asking for her medical records](#)]
- [continuing with nurse Boerum's note] "Client admits to illicit drug use during the trip [to Coachella] and states she ingested mushrooms and MDMA simultaneously while also consuming alcohol... ...client reported that her husband was not aware of male visitors nor her illicit drug use." ...has Erin Boerum got any of that wrong? -- I do not think she had anything wrong. (p. 1547) [[we actually have her admission that she was having affairs and taking illegal drugs!](#)] ... and a bit later on, she of course says nurse Boerum is not correct. (p. 1550 – 1551)
- I have never vomited in parking lot in my life. (p. 1554) [[seriously?](#)]

- Whitney was pregnant at the time [of Coachella]? -- Yes. (p. 1555)
- [the same note] You are telling nurse Boerum that it was you that was vomiting and you that was high for at least 24 hours straight; is that right? -- I did tell her I felt like vomiting,... and I was not high for 24 hours. I laid in bed for 24 hours... (p. 1556)
- But it would be completely wrong to say that you would in fact drink during the evening one or two bottles of wine? -- I think that is wrong. ... I do have... two, three glasses a night sometimes,... but never bottles. (p. 1559)
- reference to the Overhaulin' show from 28. 10. 2015 (p. 1563) [the [full episode](#) (51:49) is on dailymotion]
- Mr. Killackey's statement was the result of a strike-out application. (p. 1565)
- There is a Samantha McMillen and a Savannah (McMillan). (p. 1568) [eh?]
- reference to the AH's [letter](#) to Homeland Security from 28. 9. 2014 (p. 1569 – 1574)
- This is something you know how to do, is it not, remove things, negative things on official documents? (p. 1574)
- reference to email from AH to Ms. James from 8. 5. 2014: "Savannah just asked me to write her a cheque for her pay, just checking if that's what you want me to do and, if so, how much." reply: "Yes, please, 1300." -- Yes, I did. (p. 1576)
- reference to a [cheque](#) for \$1625 from 9. 5. 2014 (p. 1578)
- reference to AH's affidavit related to dogs' smuggling into Australia (p. 1579)
- **Did you have a problem controlling your temper? -- No.** (p. 1583)
- [more from nurse Boerum's note from 27. 8. 2014] "...has had several outburst of anger and rage... ... she is nervous about being alone while husband is working on movie set in London and expressed she has difficulty dealing with feelings of insecurity and jealousy when not in the presence of her husband." (p. 1584ss)
- reference to dr. Cowan's note from 26./27. 8. 2014: "She has insight into her short temper and insecurities" (p. 1590)
- reference to nurse Boerum's note from 4. 9. 2014 (p. 1592) [which deals with a AH's frustration with restaurant's waiting staff. that reminds me of an [interview](#) (19:38) of Lee, who read out an email of a female friend server who waited on JD, AH and friends in a wine bar in LA, and AH being rude and condescending to the server, posted by Stevie J Raw (6. 8. 2021)]
- reference to nurse Boerum's note from 22. 9. 2014 (p. 1594 – 1595)
- reference to AH's photos posted online that AH didn't like, related to nurse Boerum's note from 21. 9. 201? (p. 1595 – 1596) [these the [nude photos and videos](#)? well, many of them are selfies, ain't that interesting. and they include two versions of the 'love letter'.]
- **I never got violent. --- You never got violent? --- No,**... (p. 1605) [huh. so she lied in 2014 for [Dlisted](#) (*Don't Piss Off Amber Heard Or she'll Go "Trailer Park" On You* by Allison from 23. 5. 2014), [The Huffington Post](#) (*Amber Heard Opens Up About Engagement To Johnny Depp In W Magazine* by Leigh Bickley from 23. 5. 2014, 12:34 EDT), [ET](#) (*Amber Heard: I Can Go 'Trailer Park' Real Fast* by Antoinette Bueno from 23. 5., 13:28 PDT): "Whenever my old friends meet someone I'm involved with romantically, they immediately warn them: 'She may look refined, but when

she's angry, she can go trailer park really fast". and what about this article: *Johnny Depp Slams Amber Heard Laqsuit: Claims He Has New Witnesses Of Violence Against Him* by Samantha Wilson for [Hollywood Life](#) from 12. 4. 2019, 11:57 EDT, which says that "Depp's legal team is now interviewing several women who have come forward with claims that Heard acted violently toward them". why haven't we seen any of those interviews in the UK?]

- reference to audio recording "Argument 2" (p. 1606 – 1615) [it was made public in [part 1](#) (1:05:07) and [part 2](#) (59:35) in *Amber Heard witness statements: Depp blamed 'the monster' for physical, verbal abuse* on [Court TV](#) on 20. 7. 2020, 14:32. unofficial uncensored transcript was made by Kinsey Crosby and reposted in [part 1](#) and [part 2](#) on [deppdive](#).]
- [2009]
- reference to AH's arrest for domestic violence from 2009 which was witnessed by a police officer at an airport (p. 1617) [[this is AH's arrest for assaulting her then domestic partner Ms. van Ree at the Seattle International Airport](#). the [court recording](#) of this was published in *Amber Heard arrested for domestic violence against girlfriend* for [TMZ](#) on 7. 6. 2016, 1:00 PT. unofficial [transcript](#) was tweeted by Brian McPherson.]
- reference to Colleen, AH and Ms. van Ree's neighbour in Puerto Rico (p. 1617) [[this was during the filming of The Rum Dairy in 2009. Colleen Atwood was the stylist for the film.](#)]
- You had a neighbour called Colleen? --- No. Colleen was the wardrobe designer who dressed both Johnny and I and all the main characters in the movie; but I do not think she lived anywhere near me. (p. 1617)
- [Puerto Rico] Did a neighbour ever come to complain to you about the fact that you and Ms. van Ree would have constant loud screaming fights? ... so loud, vivacious and frequent that they proved problematic for your neighbours? -- Absolutely not. (p. 1618)
- reference to a [court hearing transcript related to AH's arrest, from 26. 10. 2009](#): (p. 1619 – 1620) [unofficial [transcript](#) was tweeted by Brian McPherson][[the date is incorrect, the hearing took place on 15. 9. 2009.](#)]
- Date of violence would have been 14th September... (p. 1619)
- ...what you were being told was that it was not necessarily the end of it that day. If they got a statement from Ms. van Ree within the next two years, you in fact had to be available and keep your address with the court just in case... (p. 1621)
- [May 2016, Divorce]
- reference to the article of the arrest from 16. 9. 2016 (p. 1622, 1624) [perhaps this one *Amber Heard was 'arrested for suspected domestic violece against Tasya van Ree': star grabbed girlfriend's arma in airport row in 2009* by Chris Summers for [Daily Mail](#) from 7. 6. 2016, 10:48 GMT; or *Amber Heard Was Arrested for Domestic Violence in 2009 After Allegedly Striking Girlfriend Tasya van Ree* by Jodi Guglielmi for [People](#) from 7. 6. 2016, 12:20; or this one *Amber Heard arrested for attacking ex-girlfriend in 2009* by Yaron Steinbuch for [Page Six](#) from 7. 6. 2016, 14:17]

- reference to the video of AH's PR appearance after filing for the TRO on 27. 5. 2016 (p. 1627) [the combined footage of five different reporters is on [deppdive](#): a close-up of AH going into the car (0:10), AH leaving the court and trying hard not to smirk (0:53), the same from a different angle and with glitches for Daily Mirror (1:31), the same but blurry and with a short interview of a ?lawyer for BBC (1:40), and another with a quite good close-up at the start for Daily News (0:29), and another [video](#) (0:53) was published by X17onlineVideo]
- On the same day [27. 5. 2016], that business card [the [LAPD card](#)] which had been handed to you appeared in the news. --- this is reference to article *Amber Heard claims domestic violence Gets restraining order against Johnny Depp* for [TMZ](#) from 27. 5. 2016, 9:36 PT, where AH claims to have video footage of one of the beatings and had been offered money to keep quiet -- I do not know what you are talking about. (p. 1628 – 1629) [**I assume this is AH's LAPD card**]
- ...and Laura Wasser, his [JD's] divorce attorney, worked closely with the TMZ throughout the proceedings, including leaking things all the time... (p. 1630 – 1631)
- reference to F894.235 [photo](#) of AH at the courthouse (p. 1633)
- reference to file J47 photo with AH without any marks from 28. 5. 2016 (p. 1633 – 1634) [one of these: [photo1](#), [photo2](#), [photo3](#), [photo4](#)]
- Far from being petrified of Mr. Depp,... between 21st May, so after he left Eastern Columbia, until 27th, you were contacting him on the phone. -- Yes, I was attempting to. (p. 1635 – 1636)
- ...on 18th May [2016]... you actually spoke with a matrimonial lawyer called Susan Wisener? -- I spoke to her briefly on the phone as an anonymous Jane Doe... as to whether or not I could legally change my name. (p. 1639 – 1640)
- reference to AH's [divorce/TRO declaration](#) from 26. 5. 2016 (p. 1643)
- reference to AH's [deposition](#) from 13. 8. 2016 (p. 1644)
- **My account has not changed at all throughout any of these.** (p. 1649)
- You were on the phone to your publicist and the lawyer before the police arrived, were you not? -- I do not recall the sequence of calls. (p. 1654)
- reference to [texts](#) between Mr. Wright and Ms. Pennington from 21. 5. 2016, from 20:16 onwards: "Are you at Eastern? JD attacking Amber. She told me to call 911. I am doing it." -- "Call me." -- "Does she have her phone with her?" -- "Yes, she is talking to her lawyer." -- "The cops have her number." -- "Are they indeed coming?" (p. 1655 – 1656)
- reference to Mr. Drew's [witness statement](#) from 12. 2. 2020 (p. 1657)
- reference to the video of AH's [deposition](#) from 13. 8. 2016 (p. 1664) [[video 1](#) (1:40), [video 2](#) (1:52), [video 3](#) (3:49), [video 4](#) (1:20), [video 5](#) (12:21), [video 6](#) (0:33), [video 7](#) (2:40) from [deppdive](#).]
- reference to text from AH to Ms. McMillan from 22. 5. 2016, 5:32: "...please don't text Rocky or anyone, it's ok." (p. 1672)
- reference to F894.155 [photo](#) (p. 1675)
- reference to F894.157 [photo](#) (p. 1675)
- reference to F894.163 [photo/photo](#) and F894.165 [photo](#) (p. 1676)
- reference to F894.171 [photo](#) and F894.173 [photo](#) (p. 1677)

- reference to F894.202 [photo](#) and F894.204 photo (p. 1677)
- reference to F894.208 [photo](#) and F894.210 [photo](#) (p. 1678)
- reference to F894.212 [photo](#) and F894.214 [photo/photo](#) (p. 1679)
- reference to F894.216 [photo](#) and F894.218 [photo/photo](#) and F894.220 [photo/photo](#) (p. 1679)
- reference to F894.228 [photo](#) of AH and Ms. Pennington at the bead fair from 22. 5. 2016, and F894.232 [photo](#) (p. 1680)
- reference to F894.235 [photo](#) and F894.239 [photo](#) from the courthouse from 27. 5. 2016 (p. 1680)
- reference to article *Amber Heard leaves meeting with lawyers after split from husband Johnny* by Matt Hunter for [Daily Mail](#) from 29. 5. 2016, 9:47 GMT (p. 1681)
- reference to article *The actress and her lawyer Samantha Spector appeared at the Superior Court of California of Los Angeles on Friday* from 29. 5. 2016 (p. 1682)
- ...the meeting with your lawyer was on the Saturday, which was 28th may... (p. 1684)
- reference to F894.226 and F894.226A [photo](#) of AH and Ms. Pennington at the bead fair from 22. 5. 2016 (p. 1686 – 1687)
- Were you wearing makeup in these photographs? -- Yes. (p. 1687)
- **21. 07. 2020 – transcript from court hearing ([UK21](#))** ✓
 - [[Amber Heard](#)]
 - reference to F894.224 and F894.224A [photo](#) of AH and Ms. Pennington at the bead fair from the morning of 22. 5. 2016, 13:58 (p. 1694) [much better [photo](#) is F894.228]
 - I went to the bead show first and then to... Amanda's [de Cadenet] birthday party. (p. 1695)
 - reference to AH's declaration from 10. 4. 2019: "[JD] also destroyed all of Rocky's beads which she used in her work that were supposed to be used in her show the next day." ... Was that true? -- Yes. ... She had tons of beads in reserve. They were not the ones she had been working on to sell. (p. 1696 – 1698)
 - reference to texts between AH and nurse Boerum from 22. 5. 2016: Cops just left... and three attached files, but AH does not remember what. (p. 1700)
 - reference to texts between AH and Mr. Drew from 22. 5. 2016 (p. 1701)
 - reference to [texts](#) between AH and Mr. Wright from 21. 5. 2016: "Because it would have gone straight to TMZ which will happen on Monday anyway." (22. 5. in New York) (p. 1701 – 1702)
 - reference to text from JD to AH? from 22. 5. 2016: "That was it, the last encounter ever." (p. 1704)
 - reference to two cctv footage clips of AH and Mr. Harrell, one of the front desk and one of the hallway in front of the package room, from 22. 5. 2016 (p. 1705 – 1708)
 - reference to F894.23? photo of AH in the same outfit as in the cctv with Mr. Harrell, from 22. 5. 2016 (p. 1709)
 - reference to [texts](#) between AH and Mr. Musk from 22. 5. 2016 (p. 1710 – 1711)
 - I was not even in communication with Elon until 2016. (p. 1713)

- reference to cctv [footage](#) with Mr. Franco from evening of 22. 5. 2016 (p. 1714)
- reference to AH's [divorce/TRO declaration](#) from 26. 5. 2016 (p. 1716)
- reference to text from AH to JD, ?, Mr. Judge, begging JD to call her, from 24. 5. 2016 (p. 1720 – 1721) [[I have to see the texts but I'm not sure if JD answers?](#)]
- reference to Ms. Spector's letter (the [extortion letter](#), [email1](#) + [email2](#)) to JD's lawyers from 24. 5. 2016 (p. 1722)
- reference of elevator cctv [footage](#) from evening of 24. 5. 2016 (p. 1733)
- reference of elevator cctv [footage](#) from late evening of 24. 5. 2016 (p. 1733)
- reference to [text1](#), [text2](#), [text3](#), [text4](#) from AH to JD related to the extortion letter from 25. 5. 2016 (p. 1735)
- reference to cctv elevator [footage](#) of AH, Ms. Pennington, Ms. Divenere from afternoon of 25. 5. 2016 (p. 1741)
- reference to cctv [footage](#) of the front desk with Ms. Esparza from 25. 5. 2016 (p. 1741)
- reference to a [phone call between AH and JD from 26. 5. 2016](#), the so-called "off limits conversation" with the secret fight club, I lost a fucking finger, thrown at my nose, etc. (p. 1745) [posted as [full phone call](#) (31:06) by Wholesome Content in *New (Full) Phone Call Johnny + Amber: "Nobody will believe you're a victim!"* from 7. 2. 2020]
- ...this is one that Johnny asked me if I was recording, to which I said no; but I believe he was recording. -- This is in fact a recording that you have produced in your own witness statement... [5th, par. 9] -- Well, I do not know what this is. (p. 1746)
- [21st April 2016, Birthday]
- reference to texts from AH to JD from morning of 20. 4. 2016 (p. 1758)
- reference to texts between AH and JD from 21. 4. 2016: "I have a 7 p.m. with Ed White, the business manager..." ... "I am in the car, baby... I'm 10 away, Slim" -- "Love you" (p. 1759)
- reference to [audio recording from 22. 7. 2016](#): "I did not want you to go to Coachella, I left because you haymarked me, you came around the bed to start fucking punching on me" (p. 1763) [['drugs'](#) (0:10, at 8:06 – 8:16), ['hug me'](#) (2:16, at 0:36 – 2:52), ['die'](#) (00:04, at 1:03 – 1:07), ['love me'](#) (0:04, at 13:10 – 13:14), ['everything'](#) (00:53, at 13:37 – 14:30), ['drinking'](#) (0:18, at 11:32 – 11:50), ['admit'](#) (0:07, at 7:58 – 8:05), ['cut me'](#) (3:37), ['headbutt'](#) (0:29), ['stripper'](#) (1:45, at 0:41 – 2:06) clips]
- reference to an excerpt of [audio recording](#) called exhibit Q, played to AH at her Aug deposition, dealing [with the bathroom incident](#) where AH admits punching JD in the face, and the throwing of pots and pans, from 9. 2015 (p. 1769) [[excerpt](#) (2:39) was published in *Rambling audio reveals Johnny Depp and Amber Heard both pleading innocence after incident where he 'opened a door over her toes' and then she 'kicked it into his head'* by Jack Wright for [Daily Mail](#) from 22. 7. 2020, 1:03 GMT]

- You do not ever in any legal proceedings want to accept or admit that you have ever used violence on Mr. Depp, even in the face of your own confession or eye witness evidence. (p. 1774)
- [Staircase]
- reference to audio recording played at AH's Aug 2016 deposition about Staircase incident; the part played here starts on p. 378 of the transcript (p. 1775) [the ['headbutt'](#) (0:29)]
- reference to F894.069 photo of JD with a bandage from 3. 2015 (p. 1785)
- ...and hit me with tha cast. He also hit Whitney with the cast. (p. 1786)
- [22nd March 2013, Painting, according to the last, 7th, witness statement]
- reference to photo with lines of cocaine, according to AH from 22. 3. 2013 (p. 1791)
- reference to emails between Keith Richards and ?AH from 20. 3. 2013 (p. 1792)
- reference to [group photo](#) of JD, AH, Keith Richards and Ms. Henriquez, which was, according to AH, taken right before the Painting incident, so 21. 3. 2013 (p. 1792)
- ...and there was blood next to the Smeg fridge, there was this old Smeg fridge and I remember the next day making a joke about it. (p. 1799) [[that's the fridge that was bought in 2014, see Mr. Waldman's tweet](#)]
- reference to J48.14 [photo](#) of AH and Ian McLagan from 23. 3. 2013 (p. 1808)
- reference to J48.16 screenshot with J48.14 photo from 7. 4. 2013 (p. 1811 – 1813)
- reference to flight and accommodation details of **Patrick McLagan** for 22. 3. 2013: his **flight landed in Los Angeles at 13.30 of 22. 3., he stayed in Hotel Los Angeles on 22. and 23. 3., and checked-out on 24. 3., then flew out on 24. 3. at 14:50** (p. 1815)
- Ms. Laws is suggesting that **it is these flight, travel and accommodation details documents that prompted AH to change her story about the Painting incident into two or multiple incidents because it refuted her original story.** (p. 1815)
- reference to emails related to Ian McLagan from 21. 3. 2013 (p. 1816 – 1817)
- No, she [Ms. Henriquez] was not there for the 8th. She was there for the 22nd. (p. 1818 – 1819)
- Tasya van Ree painting was taken off the wall during the incident just before you went to Keith Richards documentary? -- That is correct. (p. 1820)
- reference to texts between JD and Whitney Henriquez, with attached [photo](#) of part of Ms. van Ree's painting with "van Ree" replaced with "van Pee", from 11. 2. 2014 (p. 1825 – 1828) [it is a detail of the signature]
- This is a totally different painting. (p. 1828)
- [3. 2015, Australia]
- reference to F894.051 [photo](#) of two scars on AH's arm, taken by AH's lawyers, in 2019/2020 (p. 1840)
- reference to F894.049 [photo](#) and F894.050 [photo](#), of graffited mirrors, taken by AH (p. 1840) [[three are three mirror photos, photo 1 with the spread to dry swim panties and photo 2 with dry and folded swim panties of the first mirror, and photo 3 of the second mirror](#)] [analysis of these photos was performed by Andy in [part 1](#) (21:24) and [part 2](#) (23:49) of *Johnny Depp v Amber Heard Photo Analysis Proves She*

Lied!, streamed by Stevie J Raw and Come Geek Some and reposted by Stevie J Raw (10. and 11. 1. 2022))

- reference to [photo](#) of bedroom with sliding doors in Australia (p. 1843) [also see [collage](#) of the house]
- ...there are **two recordings post this incident, both made by you...?** -- No. -- **One of them is very long [nearly five hours],... and one of them is quite short; it was taken [hours] later on that day?** -- I only knew about one. (p. 1845) [**they both come from AH's phone, but she denies knowing anything about them till the divorce proceedings or even later when they were discovered, not by her, of course, on her phone. sure. I am unclear which recording is first time-wise.**][parts of the cleaned 5h recording were posted by [Incredibly Average](#) in *Johnny Depp & Amber Heard Abuse Claims: Australia's Bloody Aftermath!* (19. 4. 2020, 36:53, at 3:49 – 32:54)]
- the **shorter recording is 27 min, where AH said she called her sister and JD is no longer around, from 8. 3. 2015** (p. 1856 – 1857)
- ...you have indicated that your phone was left downstairs, as the recording was made, and you went upstairs to make the call to your sister, or you would have done, on your iPad. -- I do not recall making that call. (p. 1859) [**are we talking about the long recording here? there are no phone logs to check this out?**]
- reference to [texts](#) between AH and Mr. Murphy regarding Rager Rover from 9. 3. 2015, 4:32 (p. 1866) [**while JD was just out of the emergency and she landed in LA, she was going over the insurance paperwork for the range rover and asked to be added to the insurance. no concern for JD? this also debunks her claims that JD took her car and didn't allow her to drive by herself – JD took her car and payed for it to be overhauled for an [Overhaulin'](#) show.**]
- **21. 07. 2020 – NGN's submissions in response to application for permission to rely on expert evidence**
- **22. 07. 2020 – transcript from court hearing ([UK22](#)) ✓**
 - [**Amber Heard**]
 - reference to F894.076 photo (p. 1878)
 - reference to F894.052 [photo](#) of JD on the hospital trolley with a cigarette mark on his right cheek (p. 1879)
 - [smuggling the dogs]
 - reference to email from Mr. Murphy to AH from 28. 3. 2015 (p. 1887)
 - reference to texts between Mr. Murphy to AH from between 29. 3. and 1. 4. 2015 (p. 1888 – 1889)
 - reference to transcript of the proceedings at the magistrates' court in Southport on 18. 4. 2016 (p. 1895 – 1896)
 - reference to [emails](#) between AH, Martin Singer and Carl Austin between 9. and 11. 10. 2015 (p. 1898 – 1899)
 - reference to Mr. Murphy statement in the Australia proceedings from 20. 10. 2015 (p. 1901 – 1902)
 - [JD and AH went back to Australia on] April 21st, 2015. (p. 1903)
 - reference to [email](#) from AH to Kate James from 21. 9. 2013 (p. 1905)
 - reference to a [group photo](#) from the Malaysia train (p. 1907)

- [15th December 2015, Headbutt]
- reference to nurse Boerum's note from 16. 12. 2015 AH recounting over phone her story to her (p. 1910)
- reference to nurse Boerum's note from 17. 12. 2015 meds delivery and door meeting (p. 1911)
- reference to F894.103 and F894.103A [photo](#) and F894.107A [photo](#) (p. 1913 – 1914)
- ...PH5, which was effectively my apartment, although I did not own it. (p. 1915)
- reference to F894.092 [photo/photo/photo](#) and F894.093 [photo/photo/photo](#) and F894.094 [photo/photo](#) of JD's scratched face (p. 1918) [they might not be under the correct numbers, but the photos are correct]
- reference to F894.122A [photo](#) of clump of hair (p. 1918)
- ...if someone is grabbing and pulling you [h]air out, they will be doing it from the root? -- What? No. -- Why did you then photographs of your scalp, if that is the case? -- ... because my scalp was bleeding and pusey. (p. 1919)
- reference to a clip from the Late Late Show with James Corden (p. 1920) [[clip1](#) (3:09) and [clip2](#) (2:29) were posted by The Late Late Show with James Corden on 17. 12. 2015]
- reference to J1.I3 still from James Corden show (p. 1921) [perhaps one of those: [still 1](#), [still 2](#), [still 3](#), [still 4](#), [still 5](#), [still 6](#)]
- ...we are now dealing with allegations that were detailed and outlined for the first time in the amended defence document... dated 21st June 2019. (p. 1921)
- I told my therapist about it years ago, actually the day after this happened. [incident 1, Tattoo] (p. 1923)
- [17th August 2014, Bahamas]
- reference to dr. Kipper's note from 17. 8. 2014, 15:45 (p. 1925)
- reference to [photo](#) of the damaged door – No, it is not [from the Bahamas]. It was a miskate in the divorce separation. (p. 1927) [there are [photo 1](#), [photo 2](#) and [photo 3](#) of this door. **no one raised any objections that she presented false evidence and swore it was correct and true copy in her UK witness statement!**]
- reference to a very short video of the Bahamas cabin and its closet (p. 1927)
- [January 2015, Tokyo]
- At what point did you attend that premier – before or after the assault? -- Two days after. I remember being concerned about any visible bruising on my back because my back was exposed. (p. 1929) [[photo](#) and [photo](#) of AH's exposed back which looks unblemished, and also give the boot to her claimings that she was forbidden to wear revealing dresses]
- [November 2015, Thanksgiving]
- reference to [video](#) of Thanksgiving 1 "the monster callling" (p. 1931 – 1933)
- reference to photo of Marilyn Manson(?), Jack Depp and AH, [photo](#) of Jack Depp and AH [dated 27. 11. 2015, 12:19 AM > 00:19] and [photo](#), all taken at about the same time (p. 1934 – 1935)
- reference to nurse Boerum's note from 16. 11. 2015 (p. 1942)
- [**Joshua Drew**]

- [21th May 2016, Divorce]
- reference to email from Mr. Drew to AH from 22. 5. 2016, 21:43 (p. 1961)
- I showed them all the damage in penthouse 3, the hallway and penthouse 5. (p. 1963)
- [Melanie Inglessis]
- [15th December 2015, Headbutt]
- ...my husband and I were supposed to go bowling with Amber by my house, I do believe around 8.30 or 9 p.m., and she never showed up so that was that. I went back home and she did send a text around maybe 10, 10.30,... So I came to the penthouse on December 15. (p. 1890 – 1981)
- [Amber Heard]
- reference to [video](#) of Thanksgiving 2 "Jack with the towel" (p. 1993)
- This is in fact after midnight, so it is after the photograph that I have showed you of you lying back next to Jack. This is time-stamped after midnight. (p. 1994)
- reference to [video](#) of Thanksgiving 1 "the monster calling" David Heard chasing Jack and Marilyn Mason is on tape (p. 1995)
- [29th December 2015, Bahamas with Tara Roberts]
- [AH] started seeing Dr. Cowan towards the end of August of 2014, so after the detox incident in the Bahamas? -- That is correct. (2004 – 2005)
- reference to dr. Cowan's note from 8. 2014: "Referred to by Dr. David Kipper, patient seen on 1st September 2014. ... Amber is a working actor who presents ad anxious and depressed. ... Amber comes from a chaotic and unstructured home. ... Amber also has a history of abusing drugs and alcohol. Currently she is clean and sober, although she states drinking wine occasionally." (p. 2005 – 2008)
- reference to dr. Cowan's note from 26. 8. 2014: "Occasionally alcohol" (p. 2009)
- When I first started seeing Johnny, I asked him about the – his body is covered in scars and they are deep cuts and burns, and I asked him about it, and he told me various stories of various moments in his life where he was in pain, and he could not handle it any more, he said, could not handle the pain. His body is full of those scars. I saw him do it myself or threaten me with it a few times. (p. 2011)
- [that's interesting. she stated in an interview for *Never Back Down* in 2008 that she finds scars on a man a "good thing" because "scars tell a story". his arms are usually the only thing we see of his body. they are full of tattoos, so the scars are probably covered up. seven or eight self-inflicted scars are on his forearm, see *The Normalization of Johnny Depp: He's been in the eye of the media storm since River phenix's death outside Depp's Sunset Strip club. Now, all the star of the new 'Gilbert Grape' and coming-soon 'Ed Wood' wants is the chance to be normal for a while* by Hilary de Vries for [Los Angeles Times](#) from 12. 12. 1993, 12:00; or *21 things that may surprise you about Johnny Depp* by Ralph Raffio for [purple cover](#) from 7. 6. 2018]
- reference wanted to send her to that alternative doctor in Tijuana, but apparently she's gone too far. Still checking, bless her. I love you to pieces. If you can't do the declaration, don't sweat it. More than anything, it is to clear my

name as a fucking abusive shithead. Also, I wonder, since I was the Client, ultimately if you and Debbie are able to at least speak of me, who I really am, and what. I was the one who asked of you to calm her down and keep her under control, not because she was kicking drugs. It was to take her pressure away from me, the same reason that I hired her shrink who, by the way, only made her worse. Anyway, there is no one closer to me, or us, than you and Debbie. I could understand that I was the fucking cunt who was abused both psychologically and physically. Remember my finger. I certainly do and so, Kipper, its no like you guys are shrinks." (p. 2015 – 2016)

- reference to article *Amber Heard's Ex-Girlfriend Tasya van Ree Speaks Out Following Domestic Abuse Allegations* by Lily Harrison for [Eonline](#) from 8. 6. 2016, 21:57 (p. 2017)
- reference to email from Ms. van Ree to ?, see under JD (p. 2017)
- Who paid Ms. McMillan's wages? -- The production company. [this is for The Danish Girl, London Fields, Aquaman, Justice League] (p. 2023 – 2024)
- reference to the [letter](#) to the Homeland Security from 28. 9. 2014 (p. 2024)
- **23. 07. 2020 – transcript from court hearing ([UK23](#)) ✓**
 - [[Amber Heard](#)]
 - [March 2013, Painting]
 - reference to F894.263A [photo](#) of cocaine in bathroom at Sweetzer from 8. 3. 2013 and F894.261A [photo](#) of Ms. van Ree's painting at the Orange from 22. 3. 2013, 1:37:30 (p. 2030 – 2031, 2038)
 - reference to J10.1 photo from 21. 3. 2013 (p. 2033)
 - reference to script supervisor's report from 22. 3. 2013: "Crew call, 12 p.m. first shot, 2.44 p.m." (p. 2034)
 - reference to texts between Mr. Holmes and AH from 22. 3. 2013: 12.03 p.m. "On my way to get him", 12.37 "Trying to wake him now", 17:65 "Success! HE's coming down" (p. 2035 – 2040)
 - reference to [texts/texts](#) from AH to Peige Heard from 22. and 23. 3. 2013 (p. 2041 – 2048)
 - My father was violent to my mother, growing up. ... And they really loved each other, but he was very violent to her until the end. They were married until she passed away. ... My dad has struggled with alcohol and drug abuse issues his whole life. ... He is an addict and an alcoholic, and he was very violent, but I love him very much. (p. 2044, 2046)
 - reference to F894.005 [photo](#) of AH's selfie with a bruise on the arm, from 23. 3. 2013: AH writes to her mother this bruise was from two weeks ago. (p. 2048) [[is this the only bruise of all the bruises AH claimed she had that actually managed to survive a day? and it totally looks like the one I get when I career into the corner of my desk. besides, \[photo\]\(#\), \[photo\]\(#\) and \[photo\]\(#\) from *How does she do it? Amber Heard still manages to look stylish while sporting an unusual pair of cropped checked pants* by Fehintola Betiku for \[Daily Mail\]\(#\) from 13. 3. 2013, 11:25 GMT show no bruise on her arm.\]](#)]

- Because MS. Heard's sister indicated in her statement that the painting that was part of the row during 8th March, she was told a few days later had been defaced with a Tasya van Pee. [Ms. Henriquez was told that in 2014] (p. 2049)
- reference to H23.4A [photo](#) of Ms. van Ree's flamingoes painting in AH's garage from 31. 5. 2013 [[who photographed it? AH? are those her legs? the painting was still in the office of PH3 \(?\) when it was on the market in 9. 2016, at 1:44 of this video posted by The Property Countdown \(21. 9. 2016\)](#)] and H23.4B [photo](#) of part of Ms. van Ree's painting with van Pee from a text from Ms. Henriquez to JD from 2014 (p. 2051)
- [March 2015, Australia]
- reference to F894.049 [photo](#) and F894.050 [photo](#) and F894.053 [photo](#) of the graffitied mirrors (p. 2061)
- reference to Mr. Judge's statement: "There are two pictures here standing, very sexy, the same picture, in a bikini with her hands on her breasts, and what he did with one of them, he painted, he drew or painted a fake dick on her pussy." (p. 2062)
- reference to text from Mr. Judge from 26. 4. 2015: "Hi boss, just wanted to say, if you and Amber need anything just let me know I will be there in 20 minutes..." (p. 2075)
- reference to Australia's [Southport] magistrate [Court] proceedings [about the dogs smuggling situation] (p. 2077 – 2079)
- reference to audio recording from 26. 9. 2015: "Since Australia we have been on our honeymoon and we had a great time, other that the fact we had a fight on the train which was physical. But then we had a fight in San Francisco but I thought everything was great." (p. 2080) [[JD's team disputes the exact day, but September 2015 is correct](#)][[part 1](#) (1:05:07) and [part 2](#) (59:35)]
- reference to AH' diary from 27. 7. 2015 (p. 2085)
- [15th December 2015, Headbutt]
- reference to San Francisco [audio](#) recording from 22. 7. 2016: "I headbutted ou in the fucking forehead. ... That doesn't break a nose." (p. 2088)
- there is another confidential part of the incident during Christmas 2015 in the Bahamas (p. 2091 – 2092)
- reference to J5.2 [group photo](#) from Coachella of people around the table: Rami Sarabi (making a face at the side of the photo), AH, Whitney, Ms. Inglessis, Mr. Wright, Ms. McMillan, from 23. 4. 2016 (p. 2093)
- [21st May 2016, Divorce]
- reference to F894.155 and F894.155A [photo](#) from 21. 5. 2016, 20:23, according to AH taken before the police arrived (p. 2094 – 2095)
- reference to F894.255B [photo](#)? from 21. 5. 2016, 21:19 (p. 2095)
- Did you want the police to question you about the events of that night? -- No. I said I did not want to. (p. 2096) [[why call the police then?](#)]
- reference to cctv footage of AH and Mr. Harrell at the front desk and in front of the mail room, [footage](#) of AH going down the elevator at 13:06 [in fact, at

13:00], AH holding packages and going with the elevator to the mezzanine at 13:09, from 22. 5. 2016 (p. 2098)

- reference to F894.226 and F894.226A [photo](#) from 22. 5. 2016, 13:58 (p. 2099)
- reference to texts between AH and Ms. de Cadenet from 22. 5. 2016 (p. 2101)
- [July 2016, San Francisco]
- Was that his idea or you idea...? -- I believe both of us, although I initiated wanting to speak to him specifically about resolving this in an amicable way. (p. 2103) [*seriously? after accusing him of beating her, practically killing her a couple of times and blackmailing him, she wants to resolve this amicably?!!*]
- [*Whitney Henriquez*]
- Sara Kitnick ... was actually writing for a publication called E! News. (p. 2113)
- ...when did you move into the Eastern...? -- ...2014, I believe. -- And you moved out after Mr. Depp and your sister had got married... after February 2015? -- Yes. (p. 2115)
- reference to private photos of the wedding that Ms. Henriquez is said to have sold out (p. 2019 – 2020) [found this article *Johnny Depp and Amber Heard wedding ceremony pics leaked* for [Times of India](#) from 18. 2. 2015, 13:20 IST, and this *Amber Heard booted sister out of free flat 'for selling Johnny Depp wedding pics'* by Jerry Lawton & Louise Randell for [The Mirror](#) from 23. 7. 2020, 15:30]
- Shortly before the trial, a photograph of [AH] at the film set was disclosed,... a photograph of your sister with Keith Richards and you as well at the film set, and an e-mail between Mr. Depp and somebody else indicating that your sister had not met Keith Richards by 20th March. (p. 2131)
- reference to J10.1 [group photo](#) at the film set from ?? 3. 2013 (p. 2131)
- reference to photo of Keith Richards in the same clothes from 21. 3. 2013, 23:22 (p. 2132)
- reference to J10.3 photo of Ms. Henriquez from 21. 3. 2013 (p. 2132)
- reference to J10.4 photo of AH (p. 2132)
- J10.1 group photo was the only photo disclosed before the trial... -- I have seen this photo before that. This photo is actually in my phone. -- When you made your statement, so you had that photograph, all these photographs, the later photographs with metadata in fact were not provided or disclosed by Mr. Depp. Are you aware that in fact – did these come from your phone? --- [JD] sent me this photo years ago via a text message, that is how I had it. ...a few days after that night... -- It is after the photograph was served upon the defence that your sister's account of then this incident took place changed. (p. 2133 – 2136)
- reference to [text](#) from AH to JD about "disco bloodbath" from 12. 3. 2013 (p. 2137)
- reference to F894.262 [photo](#) of cocaine on a glass table with the box (p. 2144)
- reference to [text](#) from Ms. Henriquez to JD with a photo of her tampon applicator and cocaine at work from 8. 4. 2013 (p. 2147) [*she admits there are several such photographs*]
- reference to J48.14 [photo](#) of Ian McLagan and AH from 23. 3. 2013 – Ms. Henriquez was not aware of this photo before AH gave evidence (p. 2150)

- reference to texts between Ms. Henriquez and JD with [photo](#) of part of Ms. van Pee's painting from 11., 24. and 25. 2. 2014, 20:08 (p. 2160)
- [March 2015, Stairs]
- Mr. Depp... had a cast on his hand, a bright green cast... -- with dinosaurs on it, yes. (p. 2170 – 2171) [there is a [photo](#) of the dinosaur cast]
- **Have you witnessed your sister being violent to others? --- No.** We tussled as kids... but **I have not seen her be violent with anybody.** (p. 2172) [**well, there is this unused clip from a [reality show](#) of Ms. Henriquez admitting that AH beat her up, from 2006**]
- I am not afraid of my sister. (p. 2173)
- It was not long after that that you and your sister had a row and you left Eastern...? -- Yes. -- About May? -- Roughly. (p. 2174) [**this is referred to in these [text1](#), [text2](#) and [text3](#) Ms. Henriquez sent to JD on 8. 12. 2015**]
- When Johnny kicked me out I was sleeping on the couch of my boss's office. (p. 2177) [**which is not true, as her boss at the time Jennifer Howell testified**]
- [You have]... add[ed] a rather dramatic detail... referring to blonde hair and blood being stuck in the splinter on the bed frame? -- That is what I recall seeing. (p. 2177) [**there is no hair stuck in the splinter, and no blood to be seen on any [photo](#) of the splintered bedframe**]
- reference to text from AH and Mr. Wright from 26. 4. 2016: AH went into convulsions and had "The worst experience of her life" ... "Media circus of a criminal trial that I have been fighting for a year." [Australia dog case which concluded on 18. 4. 2016] (p. 2182 – 2184)
- [May 2016, Divorce]
- reference to cctv footage of the fake punch (which they don't have) (p. 2186)
- reference to cctv [footage](#) from 25. 5. 2016, 19:20: Ms. Inglessis in short hair and pale stripy shirt on the far right, Ms. Henriquez, Ms. de Cadenet in checkered shirt, Ms. Pennington enters the lift, AH eating (p. 2187)
- reference to texts between Ms. Henriquez and JD (p. 2191)
- **24. 07. 2020 – transcript from court hearing ([UK24](#)) ✓**
 - [**discussion related to Ms. Henriquez**]
 - I am going to hand up something that was received by us yesterday after court from an anonymous source, from a confidential source, obviously as a result of the evidence that Ms. Whitney Heard gave yesterday. ...a transcript of a [video](#) which we were sent. ... is 2006-2007 (p. 2201, 2255)
 - [**Kristina Sexton**]
 - I did not know about the physical allegations until a few days before [the world knew]. I was aware of the emotional volatility. (p. 2213)
 - She did tell me about the physical stuff right after her birthday, before she ended up filing for divorce. (p. 2215) [**this is in contrast to par. 54 of her [witness statement](#) where she states AH told her "a few days after she filed for divorce and the restraining order". why did no one call her on that?**]
 - Would it surprise you that in May 2016, before Ms. Heard separated from Mr. Depp, that she was entertaining a high profile man at the Eastern... while Mr.

Depp was away...? [wha? who is she talking about? it can't be Mr. Musk, he was (also) after they separated.]

- [she then tells an interesting story during the 21th April 2016, that JD was upstairs and that AH, Ms. Henriquez and Ms. Pennington were trying for several hours to get him to come down to dinner, and when he finally appeared, he came down the stairs. (p. 2231 – 2232) [at least that last bit might have been true. JD could have entered PH3 then crossed to PH4 or went via PH4 to PH5 and came down the stairs to the dinner. do we know where the dinner was, PH4 or PH5?]
- ...you have said that Ms. Heard usually wears very little makeup or no makeup at all. Was that true? -- Yes. -- Would that be the case when Ms. Heard was going out of the building just, for example, to go on errands? -- Yes. When I interacted with her in the daytime, she did not really wear makeup in the daytime. (p. 2236)
- [so, the audition for Blonde was a day before AH's birthday > 29th or 20th Apr 2016, and she wore a great deal of foundation which was unusual (p. 2251–2252)
- [Whitney Henriquez]
- reference to F894.263A [photo](#) from 22. 3. 2013, 13:37 (p. 2272)
- reference to text from AH to Ms. Henriquez from 22. 3. 2015, 15:08 (p. 2273)
- reference to J5.1 photo of Coachella from 23. 4. 2016 (p. 2283)
- [Raquel Pennington]
- You had a master key, did you not? -- Correct. (p. 2289)
- reference to F894.120 and F894.120A [photo](#) taken by Ms. Pennington (p. 2313 – 2314)
- reference to F894.122 [photo](#) of clump of hair taken by Ms. Pennington (p. 2315)
- [21st May 2016] ...soon after [JD] left ... iO Tillet Wright called the police and the police arrived fairly shortly afterward...? (p. 2325)
- ...before Ms. Heard went public with the injuries, on 27th May, [you] driving with her publicist on or around the 24th? -- ...I do remember driving her there. (p. 2329)
- [AH's] lawyer was at the house. (p. 2329) [at the Eastern?]
- [iO Tillet Wright]
- reference to texts between Mr. Wright and AH from 7. 6. 2016 (p. 2344 – 2347)
- **27. – 28. 07. 2020 – closing statements**
 - NGN's closing submissions ([NGN-cl](#)) – see below
 - JD's closing statement ([JD-cl](#))
 - JD's annexe to closing statement ([JD-cl-a](#))
- **27. 07. 2020 – NGN's closing submissions ([NGN-cl](#)) ✓**
 - timelines with texts and photos for incidents in Mar 2013, Mar 2015, Dec 2015, and May 2016
 - emails between JD and Jane Rose from 20. 3. 2013, 12:48 – 19:13 (p. 3; p. 83 pdf)
 - timeline for **21. 3. 2013**, 12:30 – around 00:00 (p. 3 – 6; p. 83 – 86 of pdf)
 - 23:31, there are four photos w/ metadata, one of them of AH ([photo](#))
 - the [group photo](#) has no metadata
 - it is claimed that the Painting incident started afterwards

- 31. 5., [photo](#) of Ms. van Ree's painting that was supposedly set on fire, here seen propped against a wall of what looks to be a garage or a storage area, and the wall is apparently quite wet, the painting was contained in texts between JD and Ms. Henriquez from 31. 5. 2013 [[who took the photo? AH? are those her legs?](#)]
- timeline for **22. 3. 2013**, 12:00 – 00:00 (p. 7 – 12; p. 86 – 94 of pdf)
 - 12:37, text from AH to Mr. Holmes: "Trying to wake him now."
 - 13:37, [photo](#) of glass table with cocaine lines and JD's box, w/ metadata
 - post 14:44, text from Mr. Deuters to JD: "We've started shooting so you know"
 - post 14:44, text from JD to Mr. Deuters: "...I'm on my way..."
 - 15:08, text from AH to Ms. Henriquez: "Johnny is over still..."
 - 17:58, text from AH to Mr. Holmes: "Coming in 2"
 - 19:01, text from AH to Ms. Dembrowski: "We're finally on the way."
 - 19:15:04, screenshot of Sweetzer's cctv: JD arrives
 - 20:14, text from AH to Mr. Carino: "I'm stuck here for the moment. I'm trying to wrangle myself free. Stay tuned"
 - 20:32, text from AH to Mr. Carino: "On the way"
 - 22:38, text from AH to Mr. Carino: "And thank you for the wine!"
 - 22:39, text from Mr. Carino to AH: "He can't love anyone else. It's in his eyes. Same with Kara." [[who is Kara? Cara Delevingne? does she love AH too?](#)]
- timeline for **23. 3. 2013**, 00:02 – 17:04 (p. 12 – 15; p. 94 – 98 of pdf)
 - 00:06, text from Mr. Holmes to AH: "It might be good if he stays here tonight... [to] let him sober up.."
 - 00:10: text from Mr. Holmes to AH: "He won't drink at work because he thinks no one knows he's drinking again"
 - 13:22, text from AH to Peige Heard: "From 2 weeks ago today" with a [photo](#) of AH photographing herself with a bruise on her left arm [this is part of a series of [texts](#) AH sent her mother on 22. and 23. 5. 2013]
- other documents pertaining to 21. – 23. 3. 2013 (p. 16; p. 98 of pdf)
 - 23. 5., [photo](#) of Ian McLagan and AH
- timeline for **6. – 9. 3. 2015** (p. 1 – 14; p. 99 – 112 of pdf)
 - 13 .2., JD arrives in AUS
 - 25. 2. – 3. 3., Australia 'drug' [texts](#) between JD and Mr. Holmes
 - 7. 3., 4:30, nurse Lloyd's note: AH takes additional Seroquel
 - 7. 3., 5:00 – 9:30, nurse Lloyd's notes: AH sleeps
 - 7. 3., 17:00, JD's [text](#) to dr. Kipper
 - 8. 3., 2:59 – 4:56: JD texting Peige and David Heard
 - 8. 3., **11:00**, [text/text](#) from JD to dr. Kipper: "Had another one... I just cannot live like this... She is as full of shit as a Christmas Goose!!! ... FAR MORE hurtful than her venomous and degrading, endelss "educational" ranting...??? Is her shocking treatment of the man she was meant to love, above all... She's so desperate for success and fame... That's probably why I was acquired, mate...!!
... [I cut the top of my middle finger off...](#)"

- 8. 3., 11:05, text from JD to Mr. Holmes: "Need more whitey stuff ASAP... And the e business!!! Please... I'm in bad, bad shape..."
- 8. 3., 11:21, text from dr. Kipper to JD: "Call me"
- 8. 3., 11:30, dr. Kipper's notes: According to patient his assistant and security were on there way to pick him up. [unless there are more texts, JD did call dr. Kipper]
- 8. 3., 11:37. text from Mr. Connolly to JD: "Be there in 30 min JD!"
- 8. 3., 12:19. text from Mr. Connolly to JD: "4mins"
- 8. 3., 12:57, photo of a lamp with writing on it, no info on who took it
- 8. 3., Australian audio file, the long one, lasting almost five hours [parts of the [cleaned recording](#) were posted by Incredibly Average]
- 8. 3., 13:00, dr. Kipper's note: Patient was having a hard time leaving the house... Upon arrival to house patinet was sitting in car ready to leave.
- 8. 3., 16:20, JD admitted to Emergeny Department at Gold Coast University Hospital and seen by dr. Sawhney
- 8. 3., 21:30, dr. Kipper's [note](#): JD returns from the emergency
- 8./9. 3., [photo](#) and [photo](#) of writing on mirror, taken by AH
- 9. 3., 15:00, nurse Boerum's [note](#): ...after ct arrived at 1500
- 2019?, [photo](#) of two parallel scratches on AH's left arm [according to AH taken by her attorneys][another [photo](#) of scrathes on AH's left arm from April 2015, and an article *Johnny Depp's lawyers say Amber Heard 'deliberately cut herself before claiming he attacked her' during three-day hotel-room 'hostage situation' – as they show her photo of patio door she could have left by at any time* by Jack Wright & Vivek Chaudhary for [Daily Mail](#) from 21. 7. 2020, 18:15 GMT, with a [photo](#) from the same event]
- timeline for **21. 5. 2016** (p. 1 – 19; p. 113 – 131 of pdf)
 - 18:58, text from JD to AH: "Here"
 - 19:02 > 18:56, cctv stills of JD and both security in entry to [garage](#), lobby and [elevator](#) [there is a discrepancy of approx. 6 mins between cameras 4 and 13 (in the garage and lobby – time stamp on these stills is unfortunately illegible) and camera 2 in the elevator, according to a side note. AH claims that camera 2 is the accurate time. this is wrong and is confirmed by various footage from the following week where cameras from the lobby preceed AH going down the elevator with camera 2. therefore, camera 2 from the elevator is 6min late.]
 - 19:46, JD and AH call Mr. Murphy on JD's phone [how long was the call?]
 - 19:48 – 19:57, AH attempts to call Ms. McMillan 6x [was this while Mr. Murphy was still on the phone?]
 - 20:00, text from Mr. Murphy to Mr. Bett: "You at Sweetzer?" – response from Mr. Bett: "J calling u on my phone" [this indicates that the security was already in PH3 and all of them were possibly already out of PH3 as well, does it not? because JD has already tossed his phone on the sofa and is now using Mr. Bett's phone?]
 - 20:02 – 20:10, AH uninterruptedly texts Mr. Murphy 3x, Ms. McMillan 2x + attempts a call Ms. Pennington 2x and Mr. Wright 2x

- [during this time JD is collecting his things from upstairs? what was he then doing for a whole hour before?]
- 20:06, text from AH to Ms. Pennington: "Can you come over v"
- 20:08, text from AH to Mr. Wright: "Call me"
- 20:10, text from Ms. Pennington to AH: "Now?"
- 20:11, short phone call from Mr. Wright to AH, 0:23
- 20:11:54 – 20:15:22, long phone call from Mr. Wright to AH, 3:28
- [this is where JD went upstairs, comes down again, there is an argument, Ms. Pennington comes out of hiding, AH starts screaming and JD's security enters PH3][but how did then JD get Mr. Bett's phone to call Mr. Murphy 15min earlier? is there a phone record for this?]
- 20:16 – 20:23, Mr. Wright calls NYPD, 7min [disputed!, see above]
- 20:20 - ?: Mr. Murphy replies to AH and she has time for a long text back
- 20:23, [photo](#) in profile of redness on AH's right cheek, w/ metadata [this looks to be a selfie and this definitely means that JD must have already left PH3]
- 20:25, Mr. Wright calls Ms. Shapiro, 2min
- 20:27:27 – 20:29:40, Ms. Shapiro calls LAPD [if it was her]
- 20:29 > 20:22, JD and security leave (cctv stills from the [elevator](#), lobby, entry to the garage, and the car leaving)
- 20:33, audio call between NYPD and LAPD
- 20:36, texts between Mr. Wright and Ms. Pennington: "Does she have her phone with her?" -- "Yes she's talking to her lawyer" [so AH is already on her phone with her lawyer. certainly not on Ms. Pennington's phone.]
- 20:46, Mr. Judge calls Mr. Drew regarding JD's phone
- ≈20:53, Mr. Drew in the entryway heading out to hand over JD's phone
- 20:57, first set of LAPD officers arrive at the Eastern
- ≈21:01 – 21:02, Mr. Drew re-enters and heads up to PHs (cctv stills of entryway, lobby, lift)
- 21:04, [photo](#) of wine spill in the hallway (w/ metadata), [photo](#) of the stairs intermediate landing (w/ metadata)
- ≈21:04, first set of LAPD officers goes up the lift (cctv stills of entering and leaving the elevator)
- 21:16, first set of LAPD officers leave business card
- ≈21:19 – 21:20, first set of LAPD officers leave (cctv stills of Mr. Drew shaking hands in the elevator, leaving the elevator, lobby, entryway, garage)
- 21:20, two [photos](#) of LAPD business card [not the same photo as in the timeline, so I'm guessing this could be the other business card, given to Mr. Drew]
- 21:22, four photos of AH's alleged injuries, w/ metadata
- 21:23, text from JD to AH, Ms. Pennington and Mr. Drew: "That was it. ... You were already ready to strike!!! ... ph5 is Rocky's studio?? You are shameless... I'll never be able to understand how I fell in love with you..."
- 21:25 – 21:31, six photos of alleged injuries and 15 photos of damage to PHs, all w/ metadata
- 22:24, second set of LAPD officers arrive at the Eastern

- ≈22:25, Mr. Baruch and friend go down the elevator (cctv still)
- ≈22:28 – 22:29, second set of LAPD officers go up the lift (cctv stills of garage, entryway, lobby, elevator)
- 22:34 – 22:36, second set of LAPD officers leave (cctv [stills](#) of elevator, elevator, lobby, entryway, garage)
- 23:16, text from AH to Ms. Inglessis: "...Cops were called. They just left. Filling a restraining order. ..." [is this the first time on record that AH mentions the restraining order? apart from discussing it with her lawyer, of course.]
- 23:57, [photo](#) of AH's alleged injury, w/ metadata
- 23:58, text from AH to her parents, with the above photo [does this somehow prove/indicate that at least this photo was taken when its metadata says it was taken?]
- timeline for **22. 5. 2016** (p. 19 – 38; p. 113 – 150 of pdf)
 - 00:49, AH's [text](#) with a photo to Mr. Wright
 - 7:44, Mr. Wright's [email](#) to AH
 - 21:43, Mr. Drew's [email](#) to AH, with Ms. Pennington's [account1](#) & [2](#) as well
- timeline for **27. 5. 2016** (p. 38 – 40; p. 150 – 152 of pdf)
 - 11:21 – 13:22 [text1](#), [text2](#), [text3](#), [text4](#), [text5](#), [text6](#) between JD and David Heard
 - 11:31 – 14:49 [text1](#), [text2](#), [text3](#), [text4](#), [text5](#), [text6](#), [text7](#), [text8](#), [text9](#), [text10](#), [text11](#), [text12](#) between Paige Heard and JD
- timeline for **28. 5. 2016** (p. 40; p. 153 of pdf)
- timeline for **15. – 31. 12. 2015** (p. 1 – 54; p. 153 – 197 of pdf)
 - 15.12., 10:41, [photo](#) of writing on kitchen cupboard & [photo](#) of overturned candelabra(?)
 - 15.12, 10:46, [photo](#) of clump of hair with a finger
 - 15.12, 10:47, [photo](#) of splintered bedframe [with the folded knife and what to me looks like a duvet, so I'm really not sure what difference in the bed Mr. Murphy is talking about?]
 - 15.12, 10:48, [photo](#) of a glass bottle amidst some stuff on the floor
 - 15.12., 16:03, three screenshot photos by Mr. Murphy: photo of [clump of hair](#), photo of splintered [bedframe](#), photo of the end of the bed
 - 23.12., 19:22, three photos of JD and AH on the island
 - 26.12., 13:10, five photos of JD and AH on the island
 - **audio recording from 4. 1. 2016, 23:58?**: AH: "...everyone around me, saw all the bruises and the broken blood vessel under my eye, the bruises on my head, she missing chunks of hair, the split lip, the black eye, the swollen nose... thanks for exposing me as I said to you before don't do it again unless you want me to really also tell them my side of things, because trust me ... Trust me, you know I have a different side than ou and if I show them pictures and stuff, I'm sure they will have even more of a different side..."
 - **audio recording from around 22. 7. 2016** ['[drugs](#)' (0:10, at 8:06 – 8:16), '[hug me](#)' (2:16, at 0:36 – 2:52), '[die](#)' (00:04, at 1:03 – 1:07), '[love me](#)' (0:04, at 13:10 – 13:14), '[everything](#)' (00:53, at 13:37 – 14:30), '[drinking](#)' (0:18, at 11:32 – 11:50),

['admit'](#) (0:07, at 7:58 – 8:05), ['cut me'](#) (3:37), ['headbutt'](#) (0:29), ['stripper'](#) (1:45, at 0:41 – 2:06) clips]

- **27. 07. 2020 – transcript from court hearing ([UK27](#))**
 - this is the hearing about the NGN's closing submission
- **28. 07. 2020 – transcript from court hearing ([UK28](#))**
 - this is the hearing about the JD's closing submission
 - the [full version](#) (2:10) of the kitchen cupboards smashing video was shown (p. 2546 – 2550)
 - "Instagram video" recorded by Ms. McMillan (p. 2579) [presumably the Coachella video?]
- **29. 09. 2020 – NGN's submissions regarding December 2015 in the Bahamas**
- **02. 10. 2020 – JD's reply to the submissions regarding December 2015 in the Bahamas**
- **02. 11. 2020 – judgement ([UK-J](#))** is also attachment A in AH's notification of judicial notice of adjudicated facts and law from 13. 4. 2021, p. 7 – 135 of pdf ([AH-NoticAdjuFacts](#)); you can listen to it on SEC's channel in [part 1](#) (56:52, 15. 3. 2021) and [part 2](#) (1:08:23, 15. 3. 2021), or one Stevie J Raw's channel in [part 1](#) (24. 2. 2022), part 2 () and part 3 ✓
 - 4. From about 7.58am on 28th April 2018 the headline of the webside article was changed [and omitted the 'wife beater']
 - 36. The Claimant sought a direction that Ms Heard should be excluded from the court room until she gave evidence. ... I gave written decision... refusing the request.
 - 84ii. I agree that the published words do not state or suggest that Mr Depp paid Ms Heard £5 million as compensation for his violence. I agree that there is no reference to Ms Hears having sought damages for his violence.
 - 99. Mr Depp described a troubled childhood. His home life... was not stable or safe. He had been beaten as a child and for trivial matters. He said that had turned him against violence of any sort, bu he was prepared for violence if he thought something was unjust or someone had been physically attacked.
 - 100. His mother had been taking 'nerve pills' and on one occasion he had taken one. He found that it calmed his pain. He accepted that he had had a history of using or over-using alcohol and controlled drugs which included cocaine, ecstasy (MDMA), magic mushrooms and cannabis as well as certain prescribed drugs (notalby Oxycodone, Roxicodone). ... In an email to [JD's] sister, Christi Dembrowski, of 18th August 2014, Dr Kipper said... [JD] "actually romanticizes the entire drug culture and has no accountability for his behaviours".
 - 101. Ms Heard also gave an account of a troubled home life. She said that both her parents had been alcoholics. She said that her father (David Heard) had been violent to her mother (Paige). [no mention that they were also drug users. her father was also violent to dogs, her ran a dog fighting ring in 1992, see *Secret Exposed: Amber Heard's Dad Jailed For Running Dog Fighting Ring, Pit Bulls Slayed*

In Bloody Death Matches for [Radar](#) from 16. 8. 2021, with a [photo](#) of his sentence. this was, ironically, discovered by private detective Paul Baresi who AH hired to discover any dirt on JD – he didn't find any.]

- 103. ... None of these were charged rent by Mr Depp for the use of the penthouses.
- 106. ...as part of their divorce settlement,... Ms Heard received \$7 million. She was also relieved of any liability incurred with Mr Depp jointly and a payment of about \$500,000 was made for her legal fees. *[no mention that the liability amounted to \$6,750,000 which means she walked off with almost \$14 million!]*
- 109. – 113. [on the Homeland Security letter for Savannah McMillan which lied about her status] I accept Ms Heard's evidence in this regard.
- 117. ... The two of the then flew by a private plane to Brisbane, Australia on 21st April 2015.
- 118. Ms Heard completed an incoming passenger card which included the question, 'Are you bringing into Australia animals, parts of animals etc?'. Ms Heard answered this question 'no'. That answer was false, since Ms Heard was accompanied by Pistol and Boo. *She knew that it was false since she knew that she was accompanied by the dogs.*
- 121. On 3rd November 2015 there was an indication that *[AH] would plead guilty to the charge of knowingly making a false statement*, on the basis that the other two charges were discontinued.
- 125. Ms Callaghan dealt with the offence by finding that it was sufficient to require Ms Heard to enter into a recognisance supported by a security of \$1000 to be of good behaviour for one month.
- 126. *The offence to which Ms Heard pleaded guilty involved knowingly making a false statement. As Ms Callaghan said, that was not a trivial offence, but its nature is so far removed from the evidence which Ms Heard gave in this trial that its relevance for her credibility is marginal at most. [so, in judge's judgement, knowingly lying to the authorities to save one's ass is fine and doesn't impact on one's credibility of lying in other circumstances and to other authorities at all. ever. anywhere. wtf!!]*
- 135. Marty Singer was one of Mr Depp's American lawyers. *[again laying the blame on someone else]*
- 136. I accept Ms Heard's evidence in this regard.
- 147. I do not accept that Ms Heard sought to pressurise Mr Murphy into making a false statement for the Australian proceedings.
- 148. Accordingly, I do not consider that the allegations regarding either Ms James or Mr Murphy impinge on the credibility of Ms Heard.
- 154. The Claimant observes that the incidents of alleged violence by Mr Depp have grown in number and seriousness. In support of her application for a temporary restraining order, Ms Heard relied on only incidents 12, 13 and 14. *[and in the application for the TRO there is only one incident!]* The number had grown by the time Ms Heard was deposed in the divorce proceedings, and had increased again in Ms Heard's 1st witness statement for the present proceedings.
- 155. I do not consider that this argument undermines Ms Heard's credibility.

- 163. Ms Heard nonetheless [while the TRO was in effect] contacted Mr Depp and proposed that they meet in San Francisco. Mr Depp agreed to the meeting...
- 167. Mr Depp also agreed that Mr Carino had been present at the first meeting in July 2016. [that would be by day 1, then, 21. 7. 2016]
- 168. I do not find that any of this assists me in determining whether Ms Heard is to be believed in her allegations...
- 170. The Claimant argued that this [that only JD was the aggressor] was inconsistent with admissions which Ms Heard had made in various of her conversations with Mr Depp in which she admitted being the, or a, violent party.
- 171. ...recording, referred to as 'Argument 2'... (file 4/154/F922)
- 172. ...(file 5/161n/F1009.23): JD: I don't want a divorce, I never wanted a fuckin' divorce. I didn't want you to fuckin' go to Coachella without fuckin' talking to me because I left you because you were fuckin' ... you fuckin' hay-makered me, man. You came around the bed to fuckin' start punching on me. -- AH: I'm so sad. I love you so much. [is this 15th June 2016 recording?]
- 175. In my view no great weight is to be put on these alleged admissions by Ms Heard to aggressive violent behaviour. [did he realize he just practically blessed AH's atrocious abusive behaviour and told her 'go ahead'?]
- 176. ...file 7/155/F969 & F972 which... appears to be a recording made in late May 2016. [this is probably the call before the TRO]
- 186. ...I do not accept that Ms Heard invented the expression [the monster], still less her use of it is a reason to disbelieve her evidence...
- 188. In the course of his evidence [JD] was questioned about a number of episodes when he was said to have been violent, either to property or to people. ... I can say I did not find any of them to be of any great assistance in my task.
- 191. It may be asked why Ms Heard's record or non-record for violence is of any relevance at all. [seriously?!]
- 199. It was also put to Ms Heard that, while she had been living with Ms van der Ree in Puerto Rico, neighbours had complained of loud screaming arguments. ... This allegation is of no significance at all.
- 200. [clip from a reality show where Ms. Henríquez has bruises caused in a fight with AH] In my view, the film added nothing of value to the issue whether Ms Heard had a violent record.
- 203. I accept that shortness of temper is not the same as recourse to violence.
- 204. The bottom line therefore is that neither Mr Depp, nor Ms Heard has any previous convictions for violence.
- 210. [Incident 1: the tattoo incident] Seen in isolation, the evidence that Mr Depp assaulted Ms Heard on this occasion might not be sufficient. However, taken with the evidence as a whole, I find that it did occur.
- 225x. [Incident 2: the painting incident] Overall, I conclude that Mr Depp did assault Ms Heard as she and the Defendants have alleged.
- 229. [Incident 3: Hicksville][about the unsent AH's email from 5./6. 2013] That would be a very long time for Ms Heard to concoct a plot. While theoretically possible, I do not accept that was the case.

- 238vi. [Incident 3: Hicksville] I address another aspect of this incident in the Confidential Annexe to this judgement in which I do not accept the further allegation made by Ms Heard in relation to this incident.
- 265ix. [Incident 4: the Boston plane] I have reached conclusion regarding this incident without reliance on the tape played by Ms Wass.
- 274ii. [Incident 5: the Bahamas] I say 'imagined' because there is no evidence that Ms Heard was anything other than solicitous and following strictly the regime prescribed by Nurse Lloyd and/or Dr Kipper.
- 274v. MS Heard acknowledged that she had make a mistake about the location of the door... That is a peripheral matter and I do not find it causes me to doubt her account of being assaulted by Mr Depp.
- 278. [Incident 6: Los Angeles December 2014] In conclusion I am nor persuaded that Incident 6 constituted a physical assault of Ms Heard by Mr Depp.
- 286iii. [Incident 7: Tokyo] I do not accept that the presence of his children would have inhibited Mr Depp from doing so [assaulting] again.
- 370xvi. [Incident 8: Australia] I do not accept that Ms Heard was responsible for the injury to Mr Depp's finger.
- 370xxiii. [Incident 8: Australia] I have also accepted the further allegation in the confidential annexr regarding this incident.
- 386ix. [Incident 9: the Stairs] I find the Ms Heard was in her pyjamas... [and] did not have her purse with her. I do not find that she threw a can of Red Bull at Mr Depp.
- 396ii. [Incident 10: South East Asia train] I cannot see any injury to Mr Depp's nose on the photograph to which I have referred.
- 405. [Incident 11: Los Angeles November 2015] Ms Heard's description of his assaults on this occasion are in line with other of her allegations which I have accepted.
- 455xiii. [Incident 12: 15th December 2015] Mr Bett's photographs of the alleged injuries to Mr Depp's face are not very clear. ... I cannot see any swelling or abrasion...
- 455xiv. [Incident 12: 15th December 2015] MS Inglessis was able to conceal Ms Heard's injuries with make-up and lipstick.
- 458. [Christmas 2015 in the Bahamas] What took place in the Bahamas at Christmas 2015 is not part of the pleaded case of either party, and it is not necessary for me to resolve the disputed evidence...
- 461. [Incident 13: the Birthday party] Mr White was also asked about the financial settlement which Ms Heard received on her divorce. He said that she received \$7 million dollars tax free. She was able to keep all her own earning. In addition, Mr Depp paid legal fees of about \$500,000. She was also releived of various liabilities which the couple had jointly incurred and which amounted to about \$6,750,000. They would each be responsible for their tac liabilites arising out of the settlement.
- 476ii. [Incident 13: the Birthday party] In consequence [of the grave news] Mr Depp took marijuana, as he admitted. I find it more likely than not that he also drank alcohol and took cocaine. [on what grounds? on AH's so trusted word?]

- 478. [Faeces in bed] The Claimant said in his evidence that he regarded this incident as the final straw of his relations with Ms Heard and he resolved to divorce her.
- 480. [Faeces in bed] In my view, whether Ms Heard or one of her friends was in fact responsible is not important.
- 485. [Incident 14: 21th May 2016] [Mr. Wright's 911 call to NYPD] is timed at 23.23, which... would have been 20.23 in California. The metadata of one of the photographs of Ms Heard's right cheek (file 6/148(e)/F894.155) shows that it was taken on 21st May 2016 at 20.23. [and it is not at all odd that she had time to take or had a photograph taken of her face while JD was allegedly pulling her hair, shouting and/or swinging a magnum-sized bottle and destroying the apartment]
- 573. [Incident 14: 21th May 2016] ...is the one where the conflict in evidence is particularly sharp. I have listed those who saw Ms Heard in the days following the incident and who said that her face had no sign of injury. On the other hand, there is evidence which I find compelling of witnesses who saw Ms Heard with injuries to her face and who took photographs of these. I prefer the evidence of the latter...
- 575. I have found that the great majority of alleged assaults of Ms Heard by Mr Depp have been proven to the civil standard...
- 576. At several times in the course of this litigation, Mr Sherborne has suggested that there was unfairness to the Claimant because Mr Depp's effective opponent was Ms Heard and yet she was not a party. She had no obligation to make disclosure and she provided information to the Defendants at different times and at her choice. I am not persuaded that these comments carry any weight. ... The Claimant did indeed apply for such [stringent conditions] third-party disclosure against Ms Heard. His application was unsuccessful.
- 577. Ms Heard's evidence that she had given that sum away to charity was not challenged on behalf of Mr Depp... I recognise that there were other elements to the divorce settlement as well, but her donation of the \$ 7 million to charity is hardly the act one would expect of a gold-digger.
- 579. I also accept that Ms Heard's allegations have had a negative effect on her career as an actor and activist. [AH's [career1](#) and [career2](#) while she was with JD (incl. roles she got while she was with JD but the movie came out later). AH's [career trend](#). her biggest [bomb](#) was *London Fields* but that is also her own fault because she was sued by the producers for refusing to complete the film as intended and allegedly conspired with the director to make authorized changes to the script, and for sabotaging the film's premiere at the Toronto International Film Festival in 2015 where she campaigned for its cancellation, allegedly working with the director to eliminate some of the more provocative nude scenes despite agreeing to the scenes in her contract. AH countersued the producers for allegedly hiring a body double for nudity scenes. *'London Fields' Producers Sue Amber Heard for \$10 Million* by Gene Maddaus for [Variety](#) from 21. 11. 2016, 13:45 PT; *'London Fields' Producers Reach Settlement With Amber Heard* by Gene Maddaus for [Variety](#) from 5. 9. 2018, 10:03 PT; *Amber Heard and 'London Fields' Team End*

Controversial Legal Battle, Movie To Open After Three-Year Delay by Zack Sharf for [IndieWire](#) from 5. 9. 2018, 13:00]

- 583. For all of these reasons I accept that the Defendants have shown that the words they published were substantially true in the meanings I have held them to bear. [*substantially true means 51%*]
- **06. 11. 2020 – JD is asked by WB to resign from the role of Grindlewald** ([JD's letter to the public](#))
- **09. 11. 2020 – JD's submission and permission to appeal**
- **09. 11. 2020 – NGN's submission**
- **13. 11. 2020 – JD's reply to NGN's submission (**
- **16. 11. 2020 – JD permission to appeal denied and he is ordered to pay costs** is attachment B in AH's notification of judicial notice of adjudicated facts and law from 13. 4. 2021, p. 137 – 139 of pdf ([AH-NoticAdjuFacts](#)) ✓
 - JD had to pay at least £628.235 of NGN's attorney costs
- **07. 12. 2020 – JD appeals the ruling** ([JD-UKAppeal](#))
- **12. 2020 – application to appeal – press summary**
- **21. 12. 2020 – JD's skeleton arguments for the appeal** ([JD-UKAppealSkel](#))
- **30. 12. 2020 – NGN's response to appeal** ([NGN-AppealResp](#))
- **14. 01. 2021 – Joelle Rich's 5th witness statement** ([JoRi 21-01-14 w5](#)); [listen](#) to it on Stevie J Raw's youtube channel (30. 6. 2021)
 - article *Amber Heard Donates \$7M Divorce Settlement to Two Charities* by Ashley Cullins for [Hollywood Reporter](#) from 18. 8. 2016, 15:54 (p. 22 – 24 of pdf)
 - [letter](#) with a copy of a [cheque](#) for \$100,000 sent by JD's lawyer to CHLA, from 24. 8. 2016 (p. 26 – 27 of pdf)
 - letter with a copy of a [cheque](#) from Vanguard Charitable to CHLA regarding \$500,000 from an anonymus donor, from 1. 6. 2017 (p. 28 – 30 of pdf)
 - thank-you letter from CHLA to anonymus donor, from 27. 6. 2017 (p. 31 of pdf)
 - thank-you letter from CHLA to AH for her recommending to donate to the hospital, from 18. 7. 2017 (p. 32 of pdf)
 - letter with a copy of a [cheque](#) for \$250,000 from Fidelity Charitable to CHLA by an anonymus donor, from 9. 1. 2018 (p. 33 – 34 of pdf)
 - letter from CHLA to JD's accountant asking about any further installments as stated in the letter from 24. 8. 2016, from 14. 6. 2019 (p. 36 of pdf) [in the UK appeal hearing from 18. 3. 2021 it is stated that Mr. White said that this letter never reached him, and therefore there is no answer as it would have been produced as part of the CHLA subpoena as well]
 - [letter](#) from CHLA to AH regarding the pledged gift from 24. 8. 2016, from 26. 6. 2019 (p. 37 of pdf) [*note the scheduled installments*]
 - letter from CHLA regarding AH's petition to quash the subpoena to CHLA, from 17. 11. 2020 (p. 38 of pdf)

- ruling for CHLA's response to JD's subpoena for production for documents (= ? AH's petition to quash the subpoena) from 11. 12. 2020 (p. 39 – 44 of pdf)
- copy of [Honor Roll of Friends](#) of CHLA for fiscal year 2017 (p. 45 – 105 of pdf)
- copy of *Honor Roll of Donors* of CHLA (p. 106 – 167 of pdf)
- copy of [Honor Roll of Friends](#) of CHLA for fiscal year 2018 (p. 168 of pdf)
- copy of a [cheque](#) for \$100,000 sent by JD to CHLA (p. 169 of pdf)
- copy of a cheque for \$100,000 sent by JD to ACLU (p. 169 of pdf)
- email from Pierce O'Donnel, AH's lawyer, to Laura Wasser, JD's lawyer, regarding JD donating \$200,000 directly to the charities and not giving it to AH, from 9. 9. 2016 (p. 170 – 172 of pdf)
- article *Amber Heard calls BS on Johnny's charity donation, Now You Owe Double* by ? for [TMZ](#) from 25. 8. 2016, 11:13 PT (p. 173 – 174 of pdf)
- p. 1524 – 1539 of transcripts of AH's statement in UK court from 20. 7. 2020 and p. 2378 – 2381 from transcripts of AH's statement in UK court from 27. 7. 2020 (p. 175 – 179 of pdf)
- subpoena duces tecum for CHLA from 6. 1. 2020 (p. 180 – 191 of pdf)
- subpoena for production of business records for CHLA from 29. 5. 2020 (p. 192 – 204 of pdf)
- subpoena for ACLU (p. 205 – 229 of pdf)
- letter from JD's lawyers to judge White regarding the hearing of JD's motion to compel, from 22. 12. 2020 (p. 230 of pdf)
- transcript of hearing of JD's proposed order from 18. 12. 2020 (p. 232 – 264 of pdf)
- emails between JD's lawyers to AH's lawyers regarding JD's motion to compel (p. 266 – 270 of pdf)
- order regarding JD's motion to compel AH's documents from ? 21. 12. 2020 (p. 271 – 273 of pdf)
- AH's unsigned and undated 10-year [pledge form](#) for ACLU (p. 274 of pdf) [[well, ACLU celebrated its 100 years in 2020, see their \[centennial gala\]\(#\) page, so how come there is a centennial logo on the pledge?](#)]
- [thank-you note](#) from ACLU to AH (p. 275 of pdf)
- [letter](#) from Anthony Romero of ACLU to AH regarding the first installment, from 9. 9. 2016 (p. 275 – 276 of pdf)
- [emails/emails](#) between Anthony Romero and AH regarding her 'gifts' on 20. 6. 2017 (p. 277 – 278 of pdf)
- AH's petition to quash JD's subpoena to CHLA, 29. 7. 2020 (p. 279 – 288 of pdf)
- AH's motion to quash JD's subpoena to CHLA, 3. 2. 2021 (p. 289 – 309 of pdf)
- AH's objection to JD's proposed order regarding petition to quash the subpoena to CHLA, 23. 11. 2020 (p. 303 – 305 of pdf)
- declaration of Jennifer Howell (p. 310 – 313 of pdf)
- **14. 01. 2021 – JD's application to adduce additional evidence ([JD-UKApplAdduEvid](#))**
- **24. 02. 2021 – NGN's response to application to adduce new evidence ([NGN-RepsAddu](#))**
- **01. 03. 2021 – Edward White's 3rd witness statement ([EdWh 21-03-01 w3](#))**

- p. 869 – 872 of court transcripts between him and Ms. Wass from 13. 7. 2020 (p. C568, exh. EW1)
- **??.** **??.** **2021 – Jeffrey Smele's 4th witness statement** (??Sm 21-??-?? w4)
- **02. 03. 2021 – Joelle Rich's 6th witness statement** ([JoRi 21-03-02 w6](#)) ✓
 - 13. ...texts between AH and her then-agent [Mr. Smele] from 17. 8. 2016 and AH's nurse from 18. 8. 2016 where Mr. Smele believed AH was capable of making PR statements asserting that the proceeds from the divorce would be donated to charity, without any intention of making these donations. ... texts pre-date the start of the payments of the proceeds of the divorce from JD to AH.
 - 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. 2018, 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. 6. 2020 and is enclosed as Exhibit JR3. – follows transcript from that part of the interview
 - 19. JD had no evidence that AH's donation statements were false until after the end of the trial.
 - 21. AH's stance in the US Proceedings delayed production of documents for eight months, and Brown Rudnick are still waiting for further information from ACLU.
 - business search results for ACLU from 1. 3. 2021 (p. C493 – C494)
 - JD's 2nd [witness statement](#) from 12. 12. 2019 (p. C495 – C532)
 - AH's responses and objections to JD's 1st RFPs from 30. 12. 2019 (p. C533 – C558)
 - placeholder for the [clip](#) from AH's interview by Dutch broadcaster RTL (p. C562, exh. JR3)
- **03. 03. 2021 – JD's application to adduce fresh evidence** ([JD-AdduFreshEvid](#))
 - JD wished to adduce evidence that AH didn't donate her divorce settlement to charity, perjured herself about this in her witness statement and that the UK judgement was partially based on her perjurious statement
 - 5. A pledge is not the same as giving money.
 - 7. At the time of trial, the Applicant had his suspicions about Ms Heard's evidence... but he had *no* evidence to support them.
 - 9. The evidence presented, and was obviously intended to present, her in the strongest terms as both virtuous and a victim.
 - There is a striking lack of criticism of Ms Heard throughout the judgement.
 - 13. On the Applicant's case the fresh evidence exposes a calculated and manipulative lie, designed to achieve a potent favourable impression from the outset.
- **16. 03. 2021 – confidential information order** ([pdf](#)) ✓
- **18. 03. 2021 – hearing for permission to appeal and adduce new evidence** ([AppealHearing](#)) ✓
 - The judge found for the respondents on their plea of truth under section 2, that the 14 pleaded incidents of violence all but two were found to be made out. The ones that were not were incidents 6 and 11. (p. 3) [what does 'made out' mean?]

- The divorce was settled by a joint statement in August 2016, which was a basic part of the background narrative at the trial... (p. 8) [this also implies that the same equalization payment stipulations as in the stipulated judgement are already in the DPM]
- audio recording from 9. 2015 – yellow bundle, tab 34, 271; orange bundle, tab 5, 169 – 171; argument 2 – consensually as a therapeutic step to try to resolve the difficulties of the relationship. ... my understanding is it is September [2015], which is between incidents 10 and 11. – the "I was hitting you, I was not punching you" and "I can't promise you that I won't get physical again" (p. 37 – 43) [part 1 (1:05:07) and part 2 (59:35), unofficial transcript part 1 and part 2]
- audio recording from San Francisco from 7. 2016 – orange bundle, tab 176 – when AH insisted they meet in a hotel room and she recorded without JD's knowledge (p. 43 – 50 but the conversation is blacked out) ['drugs' (0:10, at 8:06 – 8:16), 'hug me' (2:16, at 0:36 – 2:52), 'die' (00:04, at 1:03 – 1:07), 'love me' (0:04, at 13:10 – 13:14), 'everything' (00:53, at 13:37 – 14:30), 'drinking' (0:18, at 11:32 – 11:50), 'admit' (0:07, at 7:58 – 8:05), 'cut me' (3:37), 'headbutt' (0:29), 'stripper' (1:45, at 0:41 – 2:06) clips]
- a third audio recording – orange bundle, tab 176 – (p. 43)
- audio recording from Australia from 3. 2015 – the "and she admits to me she threw the first ... And she admitted that she hit him first..." (p. 80) [secretly recorded by AH on 8. 3. 2013, as JD was taken away from the house, so between 11h and 17h. the recording (11:26) was published by Daily Mail in 'I can't find the finger!' Listen as Johnny Depp's doctor shouts as he combs through trash and blood-spattered debris while Amber Heard sobs violently after 'hurling vodka bottles at actor', as medic races to find severed digit in explosive audio by Ben Ashford on 7. 4. 2020 18:24 GMT. this was reposted by lola amis (7. 4. 2020, 11:26). the recording was transcribed and analysed by Incredibly Average (19. 4. 2020, 36:56).]
- 25. 03. 2021 – application to appeal – press summary (pdf)
- 25. 03. 2021 – approved judgement - JD's permission to adduce and appeal is denied (JD-UKAppealDeny) is also attachment C in AH's notification of judicial notice of adjudicated facts and law from 13. 4. 2021, p. 141 – 154 of pdf (AH-NoticAdjuFacts) ✓
 - audio recording from 26. 9. 2015; refers to incident 8 (par. 11) [part 1 (1:05:07) and part 2 (59:35), unofficial transcript part 1 and part 2]
 - audio recording from San Francisco from 7. 2016, covertly recorded by AH; JD refers to an incident when AH "haymakered" him and that is "incident 13, which had occurred three months earlier" ['drugs' (0:10, at 8:06 – 8:16), 'hug me' (2:16, at 0:36 – 2:52), 'die' (00:04, at 1:03 – 1:07), 'love me' (0:04, at 13:10 – 13:14), 'everything' (00:53, at 13:37 – 14:30), 'drinking' (0:18, at 11:32 – 11:50), 'admit' (0:07, at 7:58 – 8:05), 'cut me' (3:37), 'headbutt' (0:29), 'stripper' (1:45, at 0:41 – 2:06) clips] [there are two incidents, 13 was in April, and three months earlier refers to 14 in May; which one then, AH? it refers to April] (par. 12)
- 31. 03. 2021 – final order denying JD's appeal and adduce, amended to 6. 4. 2021

- **06. 04. 2021 – final order denying JD's appeal and adduce** is attachment D in AH's notification of judicial notice of adjudicated facts and law from 13. 4. 2021, p. 156 – 157 of pdf ([AH-NoticAdjuFacts](#))

Other Files

- **JD's letter about resignation from the role of Grindlewald (6. 11. 2020)** – retweeted by [The Right Side of the Roaring Rapids](#) (6. 11. 2021)
- **who supported JD:** Javier Bardem ([article/statement](#)), Orlando Bloom ([interview](#)), Alice Cooper ([article](#), [video](#)), Penelope Cruz ([article/statement](#)), Lily-Rose Depp ([article](#)), Greg Ellis ([podcasts](#), [tweet](#), [tweet](#)), Terry Gilliam ([tweet](#), [interview](#)), Ross Halfin ([tweet](#)), Leni Ito ([tweet](#)), Shane MacGowan ([article](#)), Marilyn Manson ([article](#)), Sophia Myles ([tweet](#)), Vanessa Paradis ([letter](#), [statement](#)), Billie Perry ([tweet](#)), Wynona Ryder ([statement](#)), Mark Rylance ([article](#)), Sia ([tweet](#)), Patti Smith ([tweet](#)), Doug Stanhope ([article](#)), Julien Temple ([interview](#)), Benicio del Toro ([article](#)), David Yates ([quote](#))

Analyses

- **a short explanation of the trial (2. 11. 2020)** was presented by [Alexandros Antoniou](#) of the School of Law, University of Essex
- **a critical analysis of the trial (5. 11. 2020)** by court advocate Benjamin Ramsey – titled *A critical analysis of the Johnny Depp libel trial* was posted on [Legal Cheek](#)
- **an exclusive investigation of the libel trial (from 30. 4. 2021 onwards)** by [Intelligence UK part 1](#) (also posted by [SEC](#) (31. 8. 2021), from here is the [chart](#) linking connections between judge Nichols, Mr. Wootton, The Sun and AH, and these connections were commented on in *Playing "who knows who"* and streamed by [SEC](#) (2:01:26, 11. 11. 2020)) and [part 2](#) (by [SEC](#) (2. 9. 2021)) – only these two parts of the planned 8-part investigation were published; the same site also published this short [article](#) about the trial, and this [article](#) about the appeal (by [SEC](#) (4. 9. 2021))
- **domestic abuse survivors article (25. 6. 2021)** – posted by [Johnny McNeill](#), the unpublished author of 'Galsighting Gilligan' (*Domestic Abuse: A Million Johnny's – Depp & Doe*)
- **a professional assessment of witness credibility has found all AH's witnesses not credible (online 1. 8. 2021)** – article *Assessment of Credibility of Testimony in Alleged Intimate Partner Violence: A Case Report* written by Teresa C. Silva and published in the [Journal of Forensic Psychology Research and Practice](#) ([pdf version](#))
- **analysis of witnesses and incidents, based on public witness statements, social media posts and other evidence (01. – 03. 2022)** – a series of podcasts titled *Road to Fairfax* are being performed by Laura (@LauraBockov) and Jax (@TheNamesQ) and are available on [Movie Myths & Monsters](#), with documents released on [@Mythnmonsters](#)

- **analysis of incident 1 (early 2013, tattoo):** [break-down](#) (18:03) of court documents by SEC (3. 9. 2020).
- **analysis of incident 2 (8. and/or 22. 3. 2013, disco bloodbath texts & painting & Keith Richards documentary):** [break-down](#) (42:35) of court documents by SEC (5. 9. 2020). analysis by Andy was posted by SEC in a series titled *Did Amber Make Evidence Fit The Narrative?*: [part 1](#) (16:08, 14. 2. 2022), [part 2](#) (19:45, 15. 2. 2022), [part 3](#) (14:18, 16. 2. 2022), and [part 4](#) (13:07, 17. 2. 2022), [part 5](#) (17:09, 18. 2. 2022), [part 6](#) (13:53, 21. 2. 2022), [part 7](#) (15:52, 22. 2. 2022). additional analysis of the [bruise photo](#) by Andy is in *Amber Heard Hoax Hidden in Plain Sight? Incident 2 & 12* posted by SEC (at 0:00 – 1:40, 9:47, 21. 3. 2022).
- **analysis of incident 3 (9. 6. 2013, Hicksville):** [break-down](#) (from 5:29, 20:29) of court documents by SEC (31. 8. 2020).
- **analysis of incident 4 (24. 5. 2014, Boston flight):** [break-down](#) (37:54) of court documents by SEC (8. 9. 2020).
- **analysis of incident 5 (8. – 20. 8. 2014, Bahamas detox):** [break-down](#) (25:56) of court documents by SEC (15. 9. 2020).
- **analysis of incident 6 (25. 1. 2015, Tokyo):** [break-down](#) (from 14:05, 23:53) of court documents by SEC (8. 9. 2020).
- **analysis of incident 7 (3. 2. 2015, wedding):** [break-down](#) (till 5:29, 20:29) of court documents by SEC (31. 8. 2020).
- **analysis of incident 8 (8. 3. 2015, severed finger & not-three-day not-a-hostage situation in Australia):** [break-down](#) by Incredibly Average in *Johnny Depp & Amber Heard Abuse Claims: Amber "just lost it" so Johnny Lost a Finger! New Evidence!!* (7. 4. 2020, 37:56) and the cleaned [long recording with comments](#) also by Incredibly Average in *Johnny Depp & Amber Heard Abuse Claims: Australia's Bloody Aftermath!* (19. 4. 2020, 36:53, at 3:49 – 32:54). [break-down](#) (1:08:00) of court documents by SEC (12. 9. 2020). analysis of the graffitied mirror photos by Andy in [part 1](#) (21:24) and [part 2](#) (23:49) of *Johnny Depp v Amber Heard Photo Analysis Proves She Lied!*, streamed by Stevie J Raw and Come Geek Some and reposted by Stevie J Raw (10. and 11. 1. 2022), and also reposted by SEC in [part 1](#) (14:37) and [part 2](#) (22:00) (3. and 4. 3. 2022). another analysis of the mirrors photos by Rubiks Glass: [part 1](#), [part 2](#), [part 3](#), [part 4](#). [timeline](#) (50:13) of texts was posted by SEC (24. 4. 2021). [break-down](#) (1:46:18) of court documents and other evidence by Laura and Jax (12. 3. 2022). further analysis of [timeline](#) by Andy is in *Amber Hoax Hidden in Plain Sight? Incident 8* posted by SEC (9:54, 17. 3. 2022).
- **analysis of incident 9 (22. 3. 2015, staircase):** [break-down](#) (51:09) of court documents by SEC (20. 9. 2020). [break-down](#) (1:37:37) of court documents and other evidence by Laura and Jax (15. 3. 2022).
- **analysis of incident 10 (26./27. 7. 2015, honeymoon & oriental express train):** [break-down](#) (till 14:05, 23:52) of court documents by SEC (9. 9. 2020).
- **analysis of incident 11 (26. 11. 2015, thanksgiving):** [break-down](#) (30:43) of court documents by SEC (16. 11. 2020).

- **analysis of incident 12 (15. 12. 2015, headbutt & James Corden show):** [timeline 1](#) (25:16) and [timeline 2](#) (22:04) of texts and emails were posted by SEC (5. 7. 2021). photos were analysed in *Manipulation of Photo Metadata – Incident-12* by Andy and was streamed live by SEC, Stevie J Raw, Come Geek Some, and Doctor Soup then uploaded by SEC in several installments: [part 1](#) (*Amber Heard Photos, Manipulation and Cover ups?*, 23. 11. 2021), [part 2](#) (*Does Amber Heard Have Flawed Metadata?*, 24. 11. 2021), [part 3](#) (*The Examination of Amber Heard Photo Metadata*, 28. 11. 2021), [part 4](#) (*Amber Heard – Metadata Doesn't Lie*, 1. 12. 2021), [part 5](#) (*When Did Amber Heard Take Photos of Injuries?*, 3. 12. 2021), [part 6](#) (*Investigation Into Amber Heard "Hair Picture"*, 7. 12. 2021), [part 7](#) (*Amber Heard, Her "Evidence" Is Falling Apart*, 8. 12. 2021), [part 8](#) (*Did Amber Heard Use A Prop for Her Pictures*, 17. 12. 2021). further analysis by Andy titled *Johnny Depp v Amber Heard Corden Show Photo Analysis* [part 1](#) (19:39) and [part 2](#) (13:06) was posted by Stevie J Raw (31. 1. & 1. 2. 2022). [break-down](#) (1:50:20) of court documents and other evidence by Laura and Jax (15. 3. 2022). additional analysis of the [fridge photo](#) by Andy is in *Amber Heard Hoax Hidden in Plain Sight Incident 2 & 12* posted by SEC (from 1:40, 9:47, 21. 3. 2022).
- **analysis of incident Xmas in the Bahamas (22. – 31. 12. 2015):** [break-down](#) (53:53) of court documents and other evidence by Laura and Jax (21. 3. 2022).
- **analysis of incident 13 (21. 4. 2016, birthday & Coachella):** [break-down](#) (49:48) of court documents by SEC (13. 10. 2020).
- **analysis of incident 14 (21. 5. 2016, divorce & TRO set-up):** analysis of circumstances and problems of this incident by Incredibly Average in [part 0](#) titled *Johnny Depp & Amber Heard Abuse Claims (and the lies not talked about)* (35:25, 14. 11. 2018), and [part 1](#) (28:24, 11. 3. 2019) and [part 2](#) (28:47, 13. 3. 2019) titled *Johnny Depp & Amber Heard Abuse Claims: Questions you should be asking*. an excellent [break-down of the 911 call](#) and the circumstances surrounding it by Incredibly Average in *Amber Heard & Friends: Constant Contradictions!* (1. 5. 2020). [break-down 1](#) (53:26) and [break-down 2](#) (1:13:46) and [timeline](#) (37:48) of texts from the court documents by SEC (20., 21., 24. 10. 2020). The ["Penthouse 4 Theory"](#) (41:06) or *Did Amber Mislead the LAPD?* was put forward by Linda and Les and posted by SEC (23. 9. 2021). four May 21st and 22nd photos, comparing background, eyebrows, clothing, hairstyle, jewelry, and bruising by Andy was posted by SEC as *Amber Heard Injury Photos Debunked* in [part 1](#) (14:29; 3. 2. 2022), [part 2](#) (14:45; 4. 2. 2022), [part 3](#) (12:29; 5. 2. 2022), [part 4](#) (12:32; 6. 2. 2022), [part 5](#) (16:03; 8. 2. 2022). [break-down](#) (1:54:56) of court documents and other evidence by Laura and Jax (8. 3. 2022). further analysis of [mezzanine photos](#) by Andy in *Amber Heard Hoax Hidden in Plain Sight? Incident 14* posted by SEC (9:20, 16. 3. 2022). Andy's analysis of timeline discrepancies is being posted by SEC and come geek some as a livestream [part 1](#) (1:46:15, 30. 3. 2022), [part 1](#) (45:26, 31. 3. 2022), [part 2](#) (2:18:30, 4. 4. 2022), [part 3](#) (1:18:27, 6. 4. 2022) and [part 4](#) (2:18:28, 8. 4. 2022), and as a series *The Andy Files* [part 1](#) (18:10, 5. 4. 2022) dealing with the hallway wine spill, [part 2](#) (16:58, 6. 4. 2022) dealing with other people present at the time of the incident, [part 3](#) (24:06, 8. 4. 2022) dealing with the penthouses conundrum and where did Mr. Drew take the cops, and [part 4](#) (28:32, 9. 4. 2022) dealing with the photos of the alleged damage. the [TRO](#) (8:13, 11. 4. 2022) and who said to whom to file it, by SEC.

- **analysis of San Francisco tape (22. 7. 2016):** a [psychological analysis](#) of the context of the meeting, texts between JD, AH and Christian Carino, and what was at the time known of the recording was done by Colonel Kurtz in *Amber Heard & Johnny Depp Secret San Francisco Meeting: Psychological Analysis* (4. 2. 2021, 34:25). a short [transcription](#) from the ['hug me'](#) (2:16, at 0:36 – 2:52) conversation was twitted by @samjrakoh on 19. 12. 2021, and that part was [analysed](#) by Andy in *Amber Heard 'I Was Afraid of Johnny Depp!'* and posted by SEC (23. 12. 2021, 7:45). several clips from the documentary were commented on by Les and Stevie in *Documentary deception Johnny v Amber* on Stevie J Raw in [part 1](#) (23:44, 24. 1. 2022), [part 2](#) (34:28, 25. 1. 2022), [part 3](#) (33:43, 26. 1. 2022) and [part 4](#) (35:57, 27. 1. 2022).

CAN trial – Johnny Depp charged with assault and mischief

3. – 7. 9. 1989

case no.

- **03. 1989 – JD was charged for assault of a security guard and mischief in Vancouver**
 - we don't have any legal documents, only this:
 - article *Teen heart-throb Johnny Depp, who plays an undercover policeman...* by --- for [UPI](#) from 9. 3. 1989
 - article *'Jump Street' star charged with assault* for [Desert Sun](#) from 9. 3. 1989, p. E2
 - article *Jump Street's Johnny Depp, His private world* by Steve Pond for [US Magazine](#) from 26. 6. 1989 [an interesting read]
- **12. 04. 1989 – hearing ?**
- **07. 09. 1989 – absolute discharge**
 - article by Shauna Snow & Aleene MacMinn for [Los Angeles Times](#) from 11. 9. 1989, 24:00 PT
 - absolute discharge means JD has no record of conviction

NY trial – Johnny Depp charged with criminal mischief and misdemeanor

13. 9. 1994 – 10. 3. 1995

case no.

- **13. 09. 1994 – JD was charged for criminal mischief and misdemeanor for wrecking a hotel room in Mark Hotel in New York**
 - we don't have any legal documents, only this:
 - article *Depp Trouble* by Shuana Snow for [Los Angeles Times](#) from 14. 9. 1994, 24:00 PT
 - article *Love and Depp* by Shelley Levitt for [People](#) from 3. 10. 1994
 - article *Johnny Depp: Inside His Volatile 1990s Romance with Kate Moss* by Kara Warner for [People](#) from 30. 5. 2016, 19:00
 - [video](#) (0:21) posted by lacri994 (20. 2. 2019)
 - [interview](#) (10:32) from 12. 11. 1999 on *Late Show with David Letterman*, episode 1999/180, where JD also talks about this incident
 - charges were lowered after JD agreed to pay for the damage (\$9,767.12) and will be dropped altogether in six months if no further trouble ensues
- **10. 03. 1995 – charges dropped**

UK incident – Johnny Depp cautioned for threatening behaviour

30. 1. – 1. 2. 1999

case no.

- **30. 01. 1999 – JD fends off paparazzi with a wooden plank at the back door of Mirabelle restaurant in London**
 - we don't have legal documents, only this:
 - article *Depp arrested after scuffle* for [BBC News](#) from 31. 1. 1999, 13:11 GMT
 - article *Cops: Johnny busted for Depp-lorable conduct* by Bill Hoffman for [New York Post](#) from 1. 2. 1999, 5:00
 - [comments](#) by Rachael & Caroline on the article *We arrest you, Mr. Depp, for acting like a brat* for Daily Mail from 1. 2. 1999, *Amazing pictures of Hollywood wildman's night of shame* for The Sun from 1. 2. 1999
 - [interview](#) (10:32) from 12. 11. 1999 on *Late Show with David Letterman*, episode 1999/180
 - [interview](#) (29:09) aired on 15. 11. 1999 by Charlie Rose
 - [interview](#) (18:09) from 25. 6. 2013 on *Late Show with David Letterman*, episode 2013/96
 - JD spent four hours in custody at West End Central police station, was cautioned for threatening behaviour at approximately 5:20 and released
- **01. 02. 1999 – JD cautioned and released**

TX trial – Amber Laura Heard arrested for driving with suspended licence

9. 12. 2003 – 8. 11. 2007

case no. C-1-CR-04-656223

- **09. 12. 2003 – AH was arrested for "driving while licence suspended mand"**
 - there are her [mug shot](#) (posted by jambernews on 30. 6. 2016), [mug shot and info](#) (posted by littleannye on tumblr in 2020 from the original post by angel_060563 on IG from 3. 2. 2020), and screenshots of [docket1](#) and [docket2](#) (posted by [jambernews](#) on 24. 6. 2016)
 - according to this [post](#) by Geef from 24. 6. 2016 and what Geef has seen, AH has been CONV C & I = convicted with a charge and indictment [this means that she was indicted, put on trial, the evidence against her was significant, and she was found guilty. the word 'indictment' means it was not a summary or minor offence.]
 - [apparently she had her licence suspended for about five years which speculation in the comments suggests is a lot longer than if a minor is arrested for driving under influence just once but might be if there are repeated arrests for the same offense, or there is a vehicular manslaughter. apparently there were rumours of a car accident and a girl being killed in it (possibly her best friend, as she claimed in interviews). but since she was still a minor, the record is sealed. texan [transportation code](#) (521.304 cancellation of minor's license, 521.342 automatic suspension of minor's license, 521.344 suspension for intoxication, 521.345 suspension on order of juvenile court or order based on alcoholic beverage violation by minor) and [penal code](#) (19.04 manslaughter) laws.]
 - [this definitely means that AH was charged with suspended licence at least once before as a minor]
- **29. 01. 2004 – case filing date**
- **2004 – stopped and charged while disqualified**
 - info from this [post](#) by Geef from 24. 6. 2016
 - possibly in California
 - she may have had license reinstated between 2004 and 2007, we don't know
- **08. 11. 2007 – the case was dismissed (court disposition date)**
 - screenshot of the [case page](#) (posted by [jambernews](#) on 24. 6. 2016)
 - the case was apparently dismissed because defendant [AH] was convicted in another case-04-01860

WA trial – Amber van Ree arrested for misdemeanor domestic violence

14. 9. 2009 – 3. 1. 2012

case no. CPSO 13529

- **14. 09. 2009 – Amber Vanree is arrested for "assault"**
 - On September 14, 2009, at the Seattle-Tacoma International Airport, Port of Seattle police officer Beverly Leonard witnessed Ms. Heard physically assault her then-domestic partner, Tasya van Ree, grabbing her arm, striking her and breaking her pendant, and arrested her for misdemeanor assault in the fourth degree/domestic violence. [according to this [post](#)]
 - [Ms. Leonard's [tweet](#) from 2020? when she found out she was being accused of homophobic and mysoginistic. she is in fact gay herself.]
- **15. 09. 2009 – court recording of AH's arrest for misdemeanor domestic violence ([audio](#))**
 - audio (1:03) was published in *Amber Heard arrested for domestic violence against girlfriend* for [TMZ](#) on 7. 6. 2016, 1:00 PT. [audio](#) (1:03) was reposted on [deppdive](#). a slightly shorter [audio](#) (0:58) was tweeted by [Brian McPherson](#) on 6. 8. 2018.
 - a [transcript](#) was also prepared and tweeted by Brian McPherson
- **15. 09. 2009 – conditions of release/commitment ([jpg](#))**
 - AH was booked for "arrest"
 - she was "Unconditionally released from the King Country Jail." [[why is there a 'decline' written beside that?](#)]
- **26. 10. 2009 – King County Prosecuting attorney writes to the Seattle police cited in par. 195 of the UK judgement from 2. 11. 2020 ([UK-J](#))**
 - In order to convict Amber van Ree of Assault, the state would have to prove beyond a reasonable doubt that van Ree deliberately assaulted [name redacted]. Although the state does not have to prove that an injury resulted from the assault, the state would have to show that the contact was offensive to the victim. In this case, there is no signed statement from [redaction] indicating that she was offended by Van Ree grabbing her arm not [? nor] that the contact caused her pain. In addition, due to the minimal nature of the assault and the fact that both victim and suspect are residents of California, we are declining to file charges at this time.
- **11. 2011 – letter from AH's attorney to the Seattle Police asking for the arrest record to be deleted** is mentioned in par. 197 of the UK judgement from 2. 11. 2020 ([UK-J](#))
- **11. 2011 – Seattle Police agreed to delete the arrest record** is mentioned in par. 197 of the UK judgement from 2. 11. 2020 ([UK-J](#))
 - the police replied in 7 days

- **03. 01. 2012 – letter** cited in par. 196 of the UK judgement from 2. 11. 2020 ([UK-J](#))
 - another reason for not prosecuting Ms Heard was that there had been a delay in reviewing the file and the 2-year period of limitation had in the meantime expired

CA trial – Jane Doe vs Johnny Depp

2012 – 2013

case no. BC 482823

- **16. 04. 2012 – complaint**
- **16. 04. 2012 – summons**
- **16. 04. 2012 – Jane Doe's complaint**
- **25. 04. 2012 – proof of service summons**
- **25. 04. 2012 – Jane Doe's proof of service**

- **03. 05. 2012 – Jane Doe's proof of service**
- **03. 05. 2012 – proof of service summons**
- **21. 05. 2012 – notice of case management conference**

- **06. 06. 2012 – stipulated protective order** is on p. 51 – 62 of pdf from letter to judge White from 10. 9. 2019 ([pdf](#))
- **11. 06. 2012 – JD's request**

- **2013**

CA incident – Amber Heard's ticket for driving through red light

14. 01. 2015

case no.

- **14. 01. 2015 – AH's accident report** ([jpg1](#), [jpg2](#), [jpg3](#))
 - AH got a ticket for driving through a red light and hit another car, then blamed the other driver

AUS trial – Australian Proceedings

2015 - 2016

- **21. 04. 2015** – dogs land in Australia in a private plane and are not declared
- **21. 04. 2015** – customs and border protection officer statement ([jpg1](#), [jpg2](#), [jpg3](#), [jpg4](#), [jpg5](#))
- **09. 05. 2015** – dogs are at Happy Dogz Grooming Gold Coast ([photo](#))
 - [date was calculated from article *Dog groomer sad for Johnny Depp and 'immaculate' pets* for [The Sydney Morning Herald](#) from 14. 5. 2015, 13:29]
- **13. 05. 2015** – dogs are ordered into quarantine and ordered to be re-exported within 72 hours
- **14. 05. 2015** – dogs situation in light of Biosecurity Bill 2014 ([pdf](#), [pdf](#)) is on p. 4051 & 4053; situation [excerpt](#) & [excerpt](#) page with links to [video](#) (situation at 09:06:09 – 09:06:20 & 09:12:30 – 09:14:10; whole 4:30:00) and transcripts
 - Even today on high colour we are talking about Mr Johnny Depp, who has decided to bring his two dogs in without following the proper protocol. (p. 4051)
 - I think it is very interesting on this day that the minister would choose to run out the doors and divert attention by bashing up on Johnny Depp and his party, who are making such a significant economic contribution to this country, by the way. (p. 4053)
- **15. 05. 2015** – dogs are taken out of Australia
- **06. 06. 2015** – customs and border protection officer statement ([jpg1](#), [jpg2](#), [jpg3](#))
- **10. 06. 2015** – customs and border protection officer statement
- **≈08. 07. 2015** – AH is charged with three offences as per par. 120 of the UK judgement from 2. 11. 2020 ([UK-J](#))
 - First and second offence were related to illegally importing the dogs into the country.
 - Third offence was under s.137.2(1) of the Commonwealth Criminal Code 1995 because she has produced a document, namely an Incoming Passenger Card, to Cara Burgess, an Australian Customs and Border Protection officer, knowing that the said document was false.
- **07. 09. 2015** – hearing
- **09. 09. 2015** – constituency statement at the House of Representatives Committee ([pdf](#)) is on p. 9722 – 9723; situation [excerpt](#) page with links to [video](#) (situation at 10:29:30 – 10:32:22; whole 11:17:20) and transcript
 - it's quite weirdly poetic for a legal statement and only mentions JD

- I rise today to commend the great actor Johnny Depp on his latest performance on the world stage, reviving his role as the swashbuckling pirate Captain Jack Sparrow in the latest incarnation of the blockbuster *Pirates of the Caribbean* series. However, in this sequel, it is on our island that the grave misadventure takes place. Ahoy! There be smuggling of two pooches named Boo and Pistol. Next, the illegal stowaways are discovered after a trip to a Queensland groomer turns into a famous photo shoot. Enter the villain, federal Minister for Agriculture Barnaby Joyce, who proclaims that Johnny's treasures will be 'doomed for destruction' if they are not despatched within the passing of 48 hours. Suspense rises to fever pitch—will our hero save the day? Then, in a cruel twist of fate, Mr Depp is revealed as the bad guy for allowing his international terriers to breach Australia's stringent border security. As he now ridicules Australia's strict biosecurity laws, does he not see that he himself is the fool for not recognising that two seemingly harmless pets could jeopardise an entire nation's health?
 - We rely to some extent on visitors being honest and doing the right thing. In this case, Mr Depp's deception was deliberate and foolhardy. Mr Depp's jetsetting pooches travel the globe, to countries with diseases we are fortunate to be free of. Many of these can be transmitted to humans by dogs. ... Could a Boo bite be fatal to an unwitting groomer? Recent rabid ramblings from Mr Depp would tend to suggest he is unconcerned about the dire disease risk his pooches potentially posed. The USA has many tick-borne diseases Australia is free from. What if Pistol had such a parasite?
 - By allowing his pets to enter Australia without complying with basic quarantine measures such as treatment for common external and internal parasites, Mr Depp's dogs could potentially introduce other debilitating diseases to our citizens, our pets, our livestock and our iconic Australian wildlife. As for Mr Depp now proclaiming to have eaten his dogs on the instructions of our agriculture minister, it would seem he lives in a world as fantastical as the characters he played in *Edward Scissorhands*, *Charlie and the Chocolate Factory* and *Alice in Wonderland*.
- **13. 10. 2015 – AH's unsworn statement**
 - **13. 10. 2015 – Kevin Murphy's declaration / witness statement** (KeMu 15-10-13 dc)
 - Although Mrs Depp [Ms Heard] initially instructed me to make arrangements for the dogs to travel to Australia in April 2015, it was Ms James, an Australian citizen, who assumed the primary responsibility for preparing the necessary travel-related paperwork to permit the dogs to travel with Mrs Depp to Australia. However, prior to the trip to Australia, Mrs Depp terminated Ms James' employment. Nevertheless, I was under the impression that prior to her termination, Ms James had arranged for all necessary travel-related paperwork for the dogs to legally travel to Australia. Ms James never indicated otherwise.
 - Per the household policy, Mr Depp and Mrs Depp would not have travelled with the dogs to Australia if they didn't believe all the necessary travel-related paperwork had been completed and approved.

- **03. 11. 2015** – AH indicated she would plead guilty of knowingly making a false statement on the basis that the first two charges were dismissed – this was acceptable and the guilty plea was treated as timely
- **06. 12. 2015** – hearing
- **14./15. 12. 2015** – AH finds out she alone will be facing charges
 - no official documents, but article *Amber Heard to face charges over 'dog-smuggling' drama involving Johnny Depp* for [The Guardian](#) from 14. 12. 2015, 00:35
- **15. 03. 2016** – dogs situation in relation to Biological Control Amendment Bill 2016 ([pdf](#), [pdf](#)) is on p. 3173; situation [excerpt](#) page with links to [video](#) (17:00:00) and transcripts
 - brief mention of the case, again only JD
- **17. 04. 2016** – AH's sworn affidavit
 - AH believed that the necessary documentation for the dogs' entry into Australia had been provided separately and, accordingly, it was not necessary for her to declare their presence at the customs entry. [a clever excuse]
- **18. 04. 2016** – court hearing
 - ...at the time of Ms Heard's departure for Australia in April 2015, Ms Heard was unaware the documentation for the dogs' importation into Australia had not been completed. She relied on staff to organise this, along with other travel arrangements. Just prior to Ms Heard leaving for Australia, her assistant, one of the staff responsible for that documentation had been dismissed from her employment in acrimonious circumstances [This was a reference to Ms James]. There were difficulties associated with this, and that had repercussions on the preparation of the documentation concerning the importation of the dogs. [it is awfully convenient that Ms. James has been fired just two months prior]
 - Further to this, Ms Heard had a belief that, at the time of arriving - that the form she filled out did not cover her pets. She believed the relevant paperwork had been completed for the dogs and provided to the Australian authorities separately. I MR JUSTICE NICOL Depp v NGN and Wootton Approved Judgment accept that she did not deliberately set out to deceive the Australian authorities. I also accept that it's not a question of a person believing she's above the law.
 - In pleading guilty, she accepts responsibility for the offence. Her actions indicate that she is truly remorseful for incorrectly filling out that form.
 - First of all, I say at the outset that this is not a trivial offence. Ms Heard comes before the court without any criminal history. References provided speak of her generosity and kindness as I've already spoken about. She's employed as an actor, and this requires a great deal of international travel. Sometimes she travels with her dogs, sometimes not. She's always complied with the various rules and regulations concerning such travel
 - There's genuine remorse and a high degree of cooperation. Ms Heard has returned to this country to have the matter dealt with, and her and her husband have

provided a video with regards to not making a false declaration. This video no doubt will be quite useful for the department.

- [article *Charges dropped against Amber Heard for bringing dogs to Australia with Johnny Depp* by Joshua Robertson for [The Guardian](#) from 18. 4. 2015, 5:50 BST]
- **21. 10. 2020 – discussion of AH's perjury in Rural and Regional Affairs and Transport Legislation Committee** ([pdf](#)) is on p. 13 and 78 – 79; situation [excerpt](#) page with link to the transcript; [video](#) (at 2:26 – 3:34) of the committee was posted by TUG (8:54, 30. 4. 2021)
 - On 23 July 2020, *The Australian* reported that the Australian government is considering whether to charge Amber Heard with perjury over the Pistol and Biosecurity breach. I understand the department's consulting with the commonwealth Director of Public Prosecutions. Has the department determined as to whether the government will prosecute Ms Heard? (p. 13) [the article is *Breaking hound news! Amber Heard could face charges over Pistol and Bio fiasco* by Alice Workman for [The Australian](#) from 23. 7. 2020, 6:51]
 - There was a question this morning in relation to Amber Heard. I can confirm that the department is investigating that matter. There was evidence presented in the London court case which suggested false statements were provided in the court case in Australia in 2016, so we are investigating that. (p. 78)
 - So what time line do you expect that investigation decision to be made about—as I understand it, the former estate manager of Johnny Depp, Kevin Murphy, said in a witness statement that he told Heard: "... by email, telephone and in person that she could not take the dogs to Australia because the relevant paperwork and permits were not complete and the required 10-day quarantine arrangements had not been put in place. ... Ms Heard later told the court in Australia that I had told her it was fine to bring the dogs into Australia. That is false and I never told her this." (p. 78 – 79)
 - We understand that to be the evidence provided in the London court case. Giving false testimony is an offence under the Crimes Act, so that is what we are now investigating. Time lines are a little difficult to predict, particularly so where the persons of interest are located overseas, but we are working with the AFP [Australian Federal Police] to obtain the relevant information. We will, as needed, work through the Attorney-General's Department, through mutual assistance requests, which is pretty standard for investigations which involve information being obtained offshore. (p. 79)
 - Have you have been contact with Mr Murphy? -- I don't believe so at this point. But we are liaising with the AFP, who are using their contacts overseas to obtain information on our behalf. -- So no-one's actually got to Mr Murphy since 23 July? - - I think we have made attempts to contact Mr Murphy, but I'm not sure we've made contact as yet. Those processes are underway. (p. 79)

- **25. 01. 2021 – Department of Agriculture, Water and the Environment's answer to @Paris2804's Freedom of Information request** ([jpg1](#), [jpg2](#), [jpg3](#), [jpg4](#), [jpg5](#), [jpg6](#), [jpg7](#), [jpg8](#), [jpg9](#), [jpg10](#))
 - a list of documents for release ([jpg1](#), [jpg2](#))
 - customs and border protection officer statement from 21. 4. 2015 ([jpg1](#), [jpg2](#), [jpg3](#), [jpg4](#), [jpg5](#))
 - customs and border protection officer statement from 6. 6. 2015 ([jpg1](#), [jpg2](#), [jpg3](#))
 - customs and border protection officer statement from 10. 6. 2015 ()
 - redacted document ([jpg](#))
- **26. 10. 2021 – AH's perjury case discussed in Australian senate** ([pdf](#)) starts on p. 58; [video excerpt 1](#) (1:56) and [excerpt 2](#) (1:44) were tweeted by Sienna (30. 10. 2021); the whole [video](#) (5:00:00, AH situation starts at 15:07:13) is on Parliament of Australia site
 - I just want to talk about the Amber Heard thing that was written about probably a year ago by Alice Workman in the Australian.
 - The department is aware of the current media reporting concerning the prosecution of Ms Amber Heard in Australia in 2016 and is currently liaising with the Australian Federal Police and the Commonwealth Director of Public Prosecutions on the matter.
 - This is an ongoing investigation, and I would prefer not to comment on the details as to why it has taken so long.
 - Let me put it this way: we are talking about two celebrities who thought they could circumvent Australia's biosecurity laws and smuggle two puppies into Australia. We are not talking about murder and missing persons and all sorts of stuff; it is a simple case of deliberate flouting of Australia's biosecurity laws by celebrities. Why can't you talk about it?
 - It is a matter of strong public record about the decisive action taken by the then agriculture minister and the high-profile comments that the now Deputy Prime Minister made in relation to the inappropriate importation and the failure to declare the two dogs and their subsequent departure from Australia. The issue of criminal liability is a serious issue. We take it very seriously if people mislead us or provide false statements in relation to their incoming passenger cards. We are obviously aware of the allegations. Mr Timson has indicated that we are working with the law enforcement authorities, but you obviously would not expect that we could say anything that would go to any of the detail of those inquiries. The AFP and others may be prepared to talk in more detail, but we can't say much more than we have.
 - This is a cut-and-dried case. Two celebrities thought they could sneak their dogs in on their private jet and they were caught. We are talking perjury. What is there to hide, and why is it taking so long? That is all I want to know. Do we need to have a Senate inquiry on it?
 - It is only cut-and-dried if we can get a conviction, and we can only get a conviction if we work with our partners at the AFP, the Director of Public Prosecutions and international partners. As much as we might like to pursue this matter, we have to

go in the queue behind all the other matters that those organisations and our international partners are dealing with. But you can take it as ready that, as Mr Timson has outlined, we are pursuing the matter and we don't intend to go away; we will continue to pursue.

- We are absolutely determined to ensure that biosecurity laws are fully enforced. Indeed, the parliament has recently passed significant increases in penalties associated with breaches of the law. They now include matters such as visa cancellation of foreign nationals who flout the laws, and that has been occurring. Mr Tongue is making the point that effectively the individuals associated with this matter all live overseas and the AFP are reliant upon their ability to work with foreign collaborating bodies in relation to the issue. We at the department are obviously reliant on the AFP to take this forward. So we understand your interest and concern. We are all encouraging, and we will continue to encourage, those authorities to press on the matter as quickly as they can.
- Cases like Boo and Pistol and the ongoing publicity serve to remind people, and effectively provide free publicity to us, about how seriously we take these laws.

CA trial – Amber Heard vs Dough Stanhope

3. 6. 2016 – 6. 9. 2016

case no. CV 201600280 or S-0200-CV-201600280

- **29. 05. 2016 – Doug Stanhope defends JD in his article**
 - *Johnny Depp Is Being Blackmailed by Amber Heard – Here's How I Know* by Doug Stanhope for [The Wrap](#) from 29. 5. 2016, 15:41
- **03. 06. 2016 – AH's complaint** ([pdf](#) / [pdf](#)) ✓
 - 13. Throughout the years, Heard has documented the effects of the abuse that she suffered at the hands of Depp, including numerous photographs of bruises and injuries caused by Depp's abuse, among other forms of evidence. [the admission right there! and she was not plotting anything, my ass.]
 - 17. Depp and his representatives have numerous connections in the entertainment industry [which she was happily using to benefit her career while with JD] and the entertainment industry press who will do his bidding and serve his interests, to obtain from him, in turn, favors, access and other benefits. [well, the entertainment industry press has proven her wrong on this for five long years, didn't it]
 - 22. Heard never undertook any action that could even remotely be described as "blackmail". [hmm, what about that [text](#) message from 13. 1. 2015, 21:30: "would be perfect because it gives J and I time to talk- otherwise known as me threatening his life if he misbehaves while I'm gone". or that [extortion](#) email/letter from 24. 5. 2016: "...why we did not arrange for Johnny to have been personally served at last night's movie premiere. ... If the requested notice is not signed and the original executed form is not returned to me by May 27th, we will have no alternative but to arragne for Johnny to be personally served." or that [phone call](#) from 26. 5. 2016: "It would not be about me throwing you under the bus. You know what it would be? It would be released through documented people, coming on the record, and, having the protection to do so, that haven't had yet. It would be eyewitness statements. It would be evidence. Tons of it. And it would be through years. And it would be unbelievable. ... to imagine that either I'm (a) a secret fight club, or (b)... that I havebeen plotting to do this for three years, and, while taking pictures of it, and documenting it, just saving it up for the right time... It is insanely cross-corroborated than it is planned."]
 - 23. Heard has never threatened to lie about Depp in public. ... Heard has never attempted to improperly manipulate Depp... [see above. did she ever say anything that was not a lie?]

- 24. ...and seek a court order to protect her physical safety. [yet she happily flew to San Francisco in 7. 2016 and inserted herself, without mediator or other company, into JD's hotel room and into his bed, and wanted hugs and for him to cuddle her (or more) in the bed. while the TRO was in effect.]
- 03. 06. 2016 – certificate of compulsory arbitration
- 23. 06. 2016 – subpoens duces tecum
- 23. 06. 2016 – subpoena
- 23. 06. 2016 – subpoens duces tecum
- 23. 06. 2016 – subpoena
- 23. 06. 2016 – subpoena duces tecum
- 23. 06. 2016 – subpoena
- 28. 06. 2016 – certificate of service
- 30. 06. 2016 – certificate of compulsory arbitration
- 30. 06. 2016 – answer

- 29. 07. 2016 – notice of change of address

- 02. 09. 2016 – stipulation for dismissal
- 06. 09. 2016 – order

CA trial – Nicola Six Limited vs Amber Heard vs Nicola Six Limited

21. 11. 2016 – 9. 2018

case no. SC126725

- **21. 11. 2016 – Nicola Six's complaint** ([pdf](#)) ✓
 - 1. [AH's] breaches of contract and conspiratorial efforts
 - 2. ...unauthorized and unlawful acts of Heard, Cullen, and others – most notably, their campaign to damage Plaintiff, the Picture, and the Picture's investors
 - 3. Heard's conspiracy, her campaign against the Picture, and her contractual breaches – including (i) the breach of her confidentiality obligations, (ii) her failure to perform certain acting services; (iii) her failure to render required ADR [automated dialogue replacement] services; and (iv) her failure to comply with her Publicity Contract –...
 - 10. Plaintiff... expected Heard... to attend TIFF [Toronto International Film Festival] and support the Picture, as Heard was contractually required to do – and as she had been paid to do.
 - 12. ...not only did Heard violate these contractual obligations but,... as part of her conspiracy with Cullen [the director] and others, she also engaged in affirmative efforts to damage Plaintiff and thwart the Picture's marketing, sale and distribution.
 - [*Amber Heard Sued Over Alleged Conspiracy to Undermine 'London Fields'* by Eriq Gardner for [The Hollywood Reporter](#) from 21. 11. 2016, 10:56; '*London Fields' Producers Sue Amber Heard for \$10 Million* by Gene Maddaus for [Variety](#) from 21. 11. 2016, 13:45 PT; *Amber Heard sued for \$10m in London Fields film lawsuit* by Maya Oppenheim for [Independent](#) from 22. 11. 2016, 18:31]
- **04. 2017 – AH countersues producers**
 - for allegedly hiring a body double for "explicit pornographic sex scene" which allegedly violated a "nudity rider" in her contract
 - *Amber Heard sues London Fields producer over body-double sex scenes* for [The Guardian](#) from 3. 4. 2017
 - *Amber Heard Evading Deposition, Says 'London Fields' Producer* by Eriq Gardner for [The Hollywood Reporter](#) from 27. 10. 2017, 14:43 PDT
- **09. 2018 – settlement**
 - '*London Fields' Producers Reach Settlement With Amber Heard* by Gene Maddaus for [Variety](#) from 5. 9. 2018, 10:03 PT
 - *Amber Heard and 'London Fields' Team End Controversial Legal Battle, Movie To Open After Three-Year Delay* by Zack Sharf for [IndieWire](#) from 5. 9. 2018, 13:00

CA trial – Johnny Depp vs The Mandel Company

2017 – 2018

case no. BC 646882

- **12. 07. 2009** – email from JD to Joel Mandel ([jpg](#))
- **06. 12. 2009** – email from Joel Mandel to JD ([jpg](#))
- **13. 01. 2017** – JD's complaint ([pdf](#))
 - complaint for professional negligence, breach of fiduciary duty, breach of fiduciary duty as trustee, fraud in the inducement, fraudulent concealment, constructive fraud, negligent misrepresentation, unjust enrichment, wrongful foreclosure, declaratory judgement and accounting.
 - 1. Mr. Depp trusted and reasonably relied on TMG to handle his financial and certain legal affairs, and in doing so, lost tens of millions of dollars due to Mandel's gross mismanagement and fraud.
 - 2. ...at the same time TMG was passing themselves over \$28,000,000 in contingency fees without any written agreement, TMG ignored its most basic duties to Mr. Depp by consistently failing to file or pay his taxes on time causing him to incur over \$5,600,000 in penalties and interest on his federal returns alone, failing to properly keep books and records, "loaning" nearly \$10,000,000 to third parties without Mr. Depp's required prior authorization and without proper documentation or requiring repayment, using inflated and obviously incorrect figures as "loan" offsets, falsely ascribing third parties' taxable income to Mr. Depp so that he, rather than they, paid the tax, and failing to reduce Mr. Depp's expenditures or avoid profound financial waste.
- **25. 01. 2017** – failure to file proof of service
- **26. 01. 2017** – disclaimer of interest of TMG
- **31. 01. 2017** – proof of service/summons as to TMG
- **31. 01. 2017** – summons on TMG's cross-complaint
- **31. 01. 2017** – TMG's cross-complaint for declaratory relief, breach of oral contract, open book account, breach of written contract, and promissory fraud ([cross-complaint](#))
 - TMG allege that Depp in fact squandered his own money by virtue of his overly extravagant lifestyle that he could not maintain, despite TMG's continued efforts to warn of and protect him from financial ruin.
- **01. 02. 2017** – CCP 170.6 application
- **14. 02. 2017** – notice of court's order regarding preemptory challenge
- **15. 02. 2017** – point and authorities and Benjamin Chew's declaration

- 15. 02. 2017 – demurrer
- 15. 02. 2017 – proof of service/summons for TMG
- 16. 02. 2017 – order
- 16. 02. 2017 – points and authorities
- 16. 02. 2017 – application for Benjamin Chew, Rory Adams, Joshua Drian, Adam Waldman to appear pro hac vice
- 16. 02. 2017 – ex-parte application
- 16. 02. 2017 – Matthew Kanny's declaration
- 16. 02. 2017 – receipt regarding pro hac vice fees
- 21. 02. 2017 – application pro hac vice
- 21. 02. 2017 – application pro hac vice
- 21. 02. 2017 – JD's verified application for Rory Adams to specially appear as counsel pro hac vice
- 21. 02. 2017 – Rory Adams' declaration
- 21. 02. 2017 – Benjamin Chew's declaration
- 21. 02. 2017 – Joshuy Drian's declaration
- 21. 02. 2017 – Matthew Kanny's declaration
- 21. 02. 2017 – Matthew Kanny's declaration
- 21. 02. 2017 – Matthew Kanny's declaration in support of JD's cross-defendant's application to specially appear as counsel pro hac vice
- 21. 02. 2017 – Matthew Kanny's declaration in support of JD
- 21. 02. 2017 – Adam Waldman's declaration
- 21. 02. 2017 – answer
- 21. 02. 2017 – receipt
- 23. 02. 2017 – Matthew Kanny's declaration
- 23. 02. 2017 – order regarding specially set motion regarding pro hac vice
- 23. 02. 2017 – ex-parte application regarding motions for pro hac vice
- 23. 02. 2017 – points and authorities
- 15. 03. 2017 – notice of case maganement conference
- 15. 03. 2017 – order
- 27. 03. 2017 – notice of motion for leave to file f.a.c. memorandum of p & a, declarations of Katrina dela Cruz and Metthew Kanny
- 04. 04. 2017 – motion
- 04. 04. 2017 – notice of lodging for TMG's motion to seal confidential discovery information contained in proposed redacted 1st amended complaint and declaration of Suann Macisaac conditionally under seal
- 21. 04. 2017 – statement of case management
- 21. 04. 2017 – statement – case management
- 21. 04. 2017 – receipt
- 24. 04. 2017 – notice errata

- 25. 04. 2017 – declaration
- 25. 04. 2017 – opposition
- 25. 04. 2017 – reimbursement of fees
- 25. 04. 2017 – notice of filing under seal
- 01. 05. 2017 – TMG's 1st amended cross-complaint
- 03. 05. 2017 – notice for motion withdrawal
- 04. 05. 2017 – opposition
- 05. 05. 2017 – notice of lodging
- 08. 05. 2017 – order regarding case management
- 15. 05. 2017 – declaration
- 15. 05. 2017 – objection
- 19. 05. 2017 – declaration
- 19. 05. 2017 – reply/response
- 26. 05. 2017 – declaration
- 26. 05. 2017 – declaration
- 26. 05. 2017 – declaration
- 26. 05. 2017 – JD's 1st amended complaint against TMG is on p. 25 – 77 of pdf in JD's opposition to compel responses to 10th RFAs from 25. 6. 2021 ([JD-Opp10RFP](#)) and on p. 15 – 67 of pdf in JD's opposition to motion to compel and for relief on failure to timely produce discovery before deposition of Tracey Jacobs from 17. 6. 2021 ([JD-OppRelief](#))
- 26. 05. 2016 – order regarding motion to seal, motion to seal, and motion for leave to amend
- 26. 05. 2017 – motion to quash
- 26. 05. 2017 – opposition
- 26. 05. 2017 – request for IDC
- 26. 05. 2017 – request for IDC
- 26. 05. 2017 – notice of ruling
- 26. 05. 2017 – points and authorities
- 26. 05. 2017 – statement of facts
- 02. 06. 2017 – declaration
- 02. 06. 2017 – motion to strike
- 02. 06. 2017 – points and authorities
- 08. 06. 2017 – notice for request to file documents unsealed
- 12. 06. 2017 – motion for an order to seal confidential discovery information
- 19. 06. 2017 – order
- 19. 06. 2017 – declaration
- 19. 06. 2017 – opposition to plt epa
- 19. 06. 2017 – ex-parte application
- 19. 06. 2017 – notice of filing
- 19. 06. 2017 – opposition

- 26. 06. 2017 – points and authorities
- 27. 06. 2017 – opposition
- 28. 06. 2017 – notice for motion withdrawal
- 30. 06. 2017 – reply/response
- 30. 06. 2017 – notice of lodging
- 30. 06. 2017 – stipulation and protective order
- 30. 06. 2017 – notice of filing conditionally under seal unredacted answer to 1st amended complaint
- 30. 06. 2017 – TMG's answer to 1st amended complaint
- 10. 07. 2017 – tentative ruling ([jpg](#)) ✓
 - The Court sustains the demurrer to declaratory relief, but the remaining causes of action are not relevant.
 - Without specifics, the Court cannot find they are relevant to any cause of action in the [cross-complaint].
 - JD's motion to strike is granted.
- 10. 07. 2017 – order
- 10. 07. 2017 – stip & order-use CSR
- 12. 07. 2017 – motion
- 12. 07. 2017 – declaration
- 12. 07. 2017 – motion to strike
- 20. 07. 2017 – TMG's 2nd amended cross-complaint
- 20. 07. 2017 – notice of filing
- 21. 07. 2017 – revised stipulated and protective order
- 01. 08. 2017 – motion to seal
- 07. 08. 2017 – declaration
- 07. 08. 2017 – JD's motion to uphold confidentiality designations
- 09. 08. 2017 – revised stipulated and protective order is signed and filed by court
- 30. 08. 2017 – declaration
- 30. 08. 2017 – motion to compel
- 30. 08. 2017 – statement of facts
- 30. 08. 2017 – proof of service
- 05. 09. 2017 – request for judicial notice
- 05. 09. 2017 – motion to strike
- 12. 09. 2017 – statement of facts
- 12. 09. 2017 – motion to compel
- 14. 09. 2017 – opposition document
- 19. 09. 2017 – ex-parte application
- 19. 09. 2017 – order
- 19. 09. 2017 – order – appt appr v rptr as rptr protem

- 19. 09. 2017 – report-status
- 28. 09. 2017 – notice
- 03. 11. 2017 – TMG's 3rd amended cross-complaint
- 06. 11. 2017 – TMG initiates 2nd action alleging a single count complaint for judicial foreclosure
- 22. 11. 2017 – TMG's opposition to JD's motion to uphold confidentiality designations
- 30. 11. 2017 – JD's reply to TMG's opposition to his motion to uphold confidentiality designations
- 07. 12. 2017 – hearing ([html](#))
- 28. 02. 2018 – hearing ([html](#))
- 30. 05. 2018 – Tracey Jacobs' deposition (TrJa 18-05-03 dp) is attachment 5, p. 32 – 252 of pdf, in AH's memorandum for motion in support of motion to compel and for relief based on JD's failure to timely produce discovery before the deposition of Tracey Jacobs from 9. 6. 2021 ([AH-Relief](#)) ✓
 - listed are exhibits 46 – 75 which are mostly email chains from 20. 5. 2008 till 9. 3. 2016
 - Ms. Jacobs first meet JD approx. a couple of years before she left ICM ... through contactin his mother ... approx. 1995, '96 ... I represented him for approx. 30 years. (p. 15; p. 45 of pdf)
 - Ms. Jacobs stopped being JD's agent in October 2016 (p. 18; p. 48 of pdf)
 - Mr. Joel Mandel was hired in 1999 as a business manager, Mr. Jake Bloom not long after, in 2000, as entertainment lawyer (p. 46; p. 76 of pdf)
 - Fee arrangement between UTA, Ms. Jacobs's company, and JD was 10% of everything ... she is not away of a written contract, but that is typical between talent and talent agent (p. 52; p. 82 of pdf)
 - JD never objected to the 10% percent (p. 54; p. 83 of pdf)
 - JD didn't work a lot in 2015 (p. 64; p. 94 of pdf)
 - Ms. Jacobs became aware of JD's financial problems in 2005ish (p. 65; p. 95 pdf)
 - JD was set to do Grand Budapest Hotel by Wes Anderson, ... and he used the excuse of the separation with Vanessa, but he didn't want to do it because there was so little money up front. ... he ended up taking a movie I begged not to called Transcendence. ... Wes' movie made \$200 million. (p. 68; p. 98 of pdf)
 - JD didn't blame them for financial problems, well, he did blame Joel for having to sell the boat (p. 71; p. 101 of pdf)
 - In 2010/11 it became harder for Ms. Jacobs to find good paying jobs for JD. ... She was questioned about JD's lateness, complicated, unavailable, reputation ... but she doesn't recall specific jobs (p. 73 – 74 ; p. 103 – 104 of pdf)
 - Issue of JD's substance abuse became an issue with potential employers ... it became more noticeable in 2010, 2011 ... I said there are questions about the

- drinking, and whatever drugs you might be doing, and you're showing up late, and the craziness with Amber. (p. 76 – 77; p. 106 – 107 of pdf)
- the deal with Dior was for four years (p. 91; p. 121 of pdf)
 - in November 2013 JD was filming in London (p. 93; p. 123 of pdf)
 - Nov. 2013: based on what Mr. Mandel told Ms. Jacobs, JD was spending too much money (p. 101; p. 131 of pdf)
 - As I recall, he was just very angry [this was about a meeting where JD demanded UTA to give him 15-20 million, possibly 28. 1. 2016, according to p. 139; p. 169], and he was also going through the divorce thing. So he was very angry. (p. 124; p. 154 of pdf)
 - JD said to Ms. Jacobs that he didn't AH and that it was a very difficult period for him (p. 124; p. 154 of pdf)
 - Ms. Jacobs had the first conversation with JD about drugs about 1997 then on and off through the years (p. 125; p. 155 of pdf)
 - drugs affected his moods and personality – anger, hostility, unwillingness to communicate (p. 126; p. 156 of pdf)
 - drugs also affected his professional career, his performance, reliability, showing up on time (p. 126; p. 156 of pdf)
 - alcohol abuse was also part of the problem (p. 128; p. 158 of pdf)
 - Ms. Jacobs believed JD when he told her he didn't hit Amber (p. 128 – 129; p. 158 – 159 of pdf)
 - That it was his behaviour, and his inconsistencies, and violent outbursts that led me to believe it was a possibility [that he hit her] (p. 129; p. 159 of pdf)
 - Movies Ms. Jacobs put JD in [she doesn't know the exact number, between 30 and 50] generated \$650 million (p. 132; p. 162 of pdf)
 - last time she spoke with JD was on 27. 10. 2016, at 2 in the morning, when he told her he will move to CAA (p. 133; p. 163 of pdf)
 - JD terminated Joel Mandel as his business manager on 14. 3. 2016 (p. 148; p. 178 of pdf)
 - JD potentially hired dr. Kipper in 11. 2013 (p. 159; p. 189 of pdf)
 - JD's publicist said JD smoked some pot and took a xanax before that drunken award presentation (p. 162; p. 192 of pdf)
 - 26. 2. 2015, email from Disney's president: "There were 300 extras yesterday. Disney is going to give him two day-ish to correct the lateness, and then there will be problems. ..."; 27. 2. 2015, from Disney's vice president: "Eight hours late yesterday. We're a day behind our schedule. ..." (p. 162, 165; p. 193, 195 of pdf)
 - They shut it [Pirates 5] down for over a week because he cut his finger off. (p. 167; p. 197 of pdf) [but she didn't mention that AH's disrupting behaviour on set was also a source of stress for JD and other workers, in fact so much so that she was thrown off the set. any articles or other proof of that?]
 - 14. 4. 2015, Black Mass' pressure: "He didn't show up; very upsetting." (p. 170; p. 200 of pdf)
 - He was being investigated by the Department of Family Services and the LAPD. I don't know that the charges were specifically, but she [Lily-Rose] was 15, and the

boyfriend, I believe, was 23, and they were living next door to him in one of his condos downtown. ... Ms. Jacobs believes he lied to both departments. (p. 172; p. 202 of pdf)

- [well, from the texts from Sep and Oct 2016 I can understand Ms. Jacobs was upset and bitter about how they behaved towards her before firing her]
- JD was exceedingly generous to anyone who asked him for money (p. 219; p. 249 of pdf)

- **07. 2018 – confidential settlement agreement**

- **??, ??, ????** – **Travis McGivern's draft declaration** ([TrMcG ??-??-?? dc](#)) – which may not be from this court proceedings, cause there is no date or location! ✓
 - 3. On March, 2015, I was working a security shift at Johnny's residence at [the Eastern], where Johnny was staying at the time. At approximately 4:00 to 6:00 AM, Johnny texted me and asked me to come to Penthouse 5... He also asked me to bring a nurse... When Debbie and I entered the residence, Amber and Johnny were having a verbal argument... and Amber's sister Whitne was also present. This argument lasted approximately 60 to 90 minutes. Approximately 30 to 45 minutes into argument, I witnessed Amber pick up and throw a can of Red Bull that hit Johnny in his back, and I witnessed her spit on Johnny. ... Approximatel 10 minutes before we left, I witnessed Amber punch Johnny in the eye with a closed fist.
 - 4. [December 2015, Bahamas] I escorted the family to the airport for this trip, and to be very clear, I did not see any marks, injuries, or bruises on Amber.

CA trial – Johnny Depp vs Bloom Hergott Diemer etc.

2017 – 2019

case no. BC 680066

- **31. 01. 2017** – action filed against Bloom Hergott Diemer Rosenthal Laviolette Feldman Schenkman & Godman LLP
- **19. 06. / 30. 06. 2017** – stipulation and protective order is on p. 20 – 31 of pdf in letter to judge White from 10. 9. 2019 ([pdf](#))
- **24. 07. / 08. 08. 2017** – revisited stipulation and protective order is on p. p. 34 – 47 of pdf in letter to judge White from 10. 9. 2019 ([pdf](#))
- **17. 10. 2017** – JD's complaint ([complaintBloom](#)) is also on p. 78 – 103 of pdf in JD's opposition to compel responses to 10th RFAs from 25. 6. 2021 ([JD-Opp10RFP](#))
 - complaint for: 1. breach of fiduciary duty, 2. legal malpractice, 3. unjust enrichment, 4. violation of cal. bus. & prof. code § 6147, 5. violation of cal. bus. & prof. code § 6148, 6. violation of the unfair competition law, cal. bus. & prof. code §§ 17200, 7. declaratory judgment
- **11. 12. 2017** – Bloom's answer to complaint ([answerBloom](#))
- **11. 12. 2017** – Bloom's cross-complaint ([cross-complaintBloom](#))
- **21. 03. 2018** – stipulated protective order is on p. 5 – 17 of pdf in letter to judge White from 10. 09. 2019 ([pdf](#))
- **28. 08. 2018** – order granting motion to seal portions of opposition and motion for judgement on pleadings ([jpg](#))
- **12. 12. 2018** – Johnny Depp's deposition (JoDe 18-12-12 dp); [excerpt](#), view a small part of it on [Daily Mail](#) (3:27) or on [lola amis](#) (3:27) or on [deppdive](#) (3:27)
 - Jake was involved, Marty Singer was involved. I also went to a couple of friends who had connections in the sort of upper echelon of Australian government and I was – ultimately that was the – I was paying the lawyer lawyers here – I was paying lawyers in Australia to deal with the case, and got it whittled down – she was facing two misdemeanours or something. [JD saving AH's ass. and she probably repayed him by another rant and fight, as evidence by this text from JD to AH from 20. 4. 2016: "...I've been by your side, for every drama, illness and ugly situation.!!! How do you think the goddam felony charges went away???" this might have contributed to the reason JD decided to leave her soon after.]
- **?? 01. 2019** – subpoena for Brandon Patterson under which he produced a subset of surveillance footage from the Eastern Columbia Building
- **19. 01. 2019** – Christian Carino's deposition [[may not be from this litigation!](#)]

- **25. 01. 2019 – Trinity Esparza's deposition** (TrEs 19-01-25 dp) is exhibit 1-M in JD's opposition to motion to dismiss from 20. 5. 2020, p. 193 – 242 of pdf ([JD-OppDismiss](#)) ✓
 - in 2016, there were about 20 security cameras in the ECB (p. 10)
 - locations of security cameras: three in elevators, one facing the front desk, entrances, dog run, mezzanine, by the mailroom, exiting and entering the parking garage, lobby by the front door (p. 11)
 - she saw JD one time in person, but AH came by front desk regularly (p. 14 – 15)
 - her employee Gaylynn Sumerland called her on 21. 5. to inform her that the police were called to PH3 (p. 16)
 - JD's lawyers asked for, she believes, **72 hours of footage** (p. 26)
 - footage of AH, he sister and Ms. Pennington coming back from dinner on 24. 5. 2016 and the sister pretended to punch AH in the face (p. 28 – 29)
 - **87 video clips were collected by JD's divorce lawyers** (p. 31)
 - 204 A: 25. 5., 13:42-, AH giving Ms. Esparza her key for a housekeeper (p. 32–34)
 - 204 B: 25. 5., 13:46, AH with her interior designer [Laura Divenere, on the left] and Ms. Pennington [with a drink] in the elevator going up to PHs (p. 35 – 37) [**Ms. Biles says AH is holding a key to give Ms. Esparza, but that can't be true because this footage is after and they are going up**]
 - 204 C: 25. 5., 19:18:49 – 19:12:23, AH, Ms. Henriquez [in black coat in the middle], Ms. Pennington, Ms./Mr. Wright [short hair], another woman, AH is looking through her purse and has sth in her mouth, exiting elevator on the mezzanine level [this is 0:00 – 1:23 of this [footage](#) posted by Rotten Apples on 26. 2. 2021] (p. 37 – 42)
 - [25. 5. 2016 footage: [footage](#) (2:06) made of three parts, the first two seconds are from 24. 5. 2016 on the PH level when they just left the elevator (23:19 > 23:12), then of AH, Ms. Pennington and Ms. Divenere in the elevator going down (13:51:15 – 13:52:02 > 13:45), then AH conversing with Trinity Esparza in the lobby (13:45:04 – 13:45:56), then AH, Ms. Pennington and Ms. Divenere going up the elevator (13:53:19 – 13:53:44 > 13:47). [footage](#) (1:23) of AH behaving weirdly, Ms. Henriquez, Ms. Pennington, Ms. de Cadenet, and Mr. Wright going down (19:18:52 – 19:20:18 > 19:12). all on [deppdive](#).]
 - 204 D: 24. 5., AH at the front desk picking up a package (p. 45 – 47)
 - 204 E: 24. 5., 21:17, AH, Ms. Henriquez [by elevator panel] and Ms. Pennington in the elevator [[footage](#) (at 0:00 – 0:32, 21:17:39 – 21:18:12 > 21:11) from [deppdive](#)] (p. 47 – 49)
 - a computer guy, Mr. Musk, a guy with long shaggy hair all visited AH (p. 50)
 - **computer guy visited and picked up a computer AH left for him in the last week of May** (p. 50)
 - **Mr. Musk visited AH after she filed for divorce, that or last week of May, possibly several times** (p. 50)
 - guy with long shaggy hair visited prior to 21. 5., he was possibly s makeup artist or clothes designer (p. 51)
 - Mr. Musk was there Tuesday or Wednesday of either week [she can't recall] at about 9h, plus he was there many times, incl. when AH appeared with the marks

- on her face on 27. 5. (p. 51) [the question is, was he party to the hoax, or was he just a convenient punch bag? are these bruises part of what AH has on him?]
- ???: 27. 5., Mr. Musk in the elevator on mezzanine floor after marks on AH's face (p. 53)
 - Mr. Romero told her he saw Mr. Musk visiting AH, incl. on the night before Mr. Esparza fobbed him to the car in the morning (p. 54 – 55)
 - Mr. Romero told her that when JD hurt his finger and was away, Mr. Musk started coming over, in 2015 (p. 57)
 - 204 Ea: 24. 5., 23:18, AH, Ms. Henriquez and Ms. Pennington in the elevator going up [can't be 204 E because E was filmed at 21:17; [footage](#) (at 0:33 – 1:35, 23:18:42 – 23:19:45 > 23:12) on [deppdive](#)] (p. 57 – 59)
 - when Mr. Musk left in the morning, he looked tired and his hair was messy (p. 59 – 60)
 - 204 F: 22. 5., 13:06, AH going to the elevator from the lobby [[footage](#) (at 00:00 – 00:35, 13:06:19 – 13:06:55 > 13:00) from [deppdive](#)] (p. 60 – 62)
 - 204 G: AH and Mr. Harrell in the hallway by package room (p. 62 – 63)
 - 204 H: 22. 5., 13:03, AH going to the parking garage in the mezzanine (p. 63–64)
 - 204 Ha: 22. 5., 18:19, AH going up the elevator (p. 65)
 - 204 I: 22. 5., 18:36, AH and Mr. Drew going down the elevator (p. 68 – 69)
 - 204 J: 22. 5., 22:51, AH going down the elevator (p. 69)
 - 204 K: 22. 5., 22:56:08 – 22:57:58, AH and a male in a hat going up the elevator, touching heads (p. 69 – 70) [[footage](#) (1:43) on [deppdive](#), or 1:32–2:05 of this [footage](#) with James Franco posted by Rotten Apples on 26. 2. 2021]
 - ???: 24. 5., 11:18 [pm], AH, Ms. Henriquez and Ms. Pennington entering the elevator and right before Ms. Henriquez fake-punched AH's face and they laughed (p. 71 – 75) [ok, we have [footage](#) (1:35) of them going down (21:17:40 – 21:18:13) and of them going up from a different floor (23:18:42 – 23:19:44) on [deppdive](#). there is no fake punch there.][Mr. Patterson says this happened in the evening but in front of the front desk]
 - cameras can be zoomed in and out (p. 75)
 - JD left USA on Saturday, 21. 5., and didn't return (p. 76) [he left the Eastern on Saturday, but left Los Angeles on Wednesday]
 - possibly a woman lawyer living in the ECB reported to the press that the staff didn't see marks on AH's face before 27. 5. (p. 79)
 - possibly next Friday, 3. 6., AH wanted them to talk to her friend at People magazine and retract the statement that they didn't saw any marks on her face prior to 27. 5. (p. 82 – 84)
 - around Thanksgiving 2016 AH was dropping things, swaying back and forth, looked very out, kind of upset, and was a mess (p. 88)
 - a couple of weeks after 21. 5. AH dropped her keys down the elevator shoot and had two finger-mark bruises on the right side of her neck, a mark on the left side of the cheek, and a band-aid; that was when she was interacting with Mr. Musk (p. 87, 89 – 90)

- Mr. Musk and Ms. Delevingne were with AH the day before Thanksgiving 2016, they were going up and down the elevator a lot during the night, couldn't figure out how to operate the elevator, took the stairs..., then the next morning AH appeared under the influence (p. 93 – 94)
- either 23., 24. or 25. 5. AH and her friends thought someone was in PH [5] and called Mr. Romero to check (p. 101)
- thumb drive (p. 31, exh. 204)
- **30. 01. 2019 – Alejandro Romero's deposition** (AlRo 19-01-30 dp) is exhibit 1-O in JD's opposition to motion to dismiss from 20. 5. 2020, p. 272 – 304 of pdf ([JD-OppDismiss](#)) ✓
 - footage of police getting in and out [of the elevator] (p. 21)
 - 23. or 24. 5. there were some scratches all the way on the bottom of a door [of PH5] and Mr. Romero was called because AH and Ms. Pennington were concerned; he thought Ms. Pennington's dog did the scratching because he didn't see anybody going in (p. 22 – 28)
 - AH was telling him she was afraid JD or his people were trying to go inside PH5, but Mr. Romero said why would he, JD has a key (p. 29) [*and besides, JD wasn't in the US at the time; was that an attempt to have more ammunition for TRO?*]
 - 204 A: 25. 5., AH giving Ms. Esparza the key for housekeeper [[footage](#)] (at 0:48 – 1:39, 13:45:04 – 13:45:56) on [deppdive](#)] (p. 35)
 - 25. 5., 10:30, AH taking a key from Mr. Romero (p. 37) [*must be 22:30, because Mr. Romero worked night shifts*]
 - Mr. Musk first visited AH before May 2016, but Mr. Romero doesn't recall visits earlier than 2016 (p. 40) [*at the time he told Ms. Esparza he saw Mr. Musk in 2015, too, when JD had injured finger and was away*]
 - Mr. Musk visited late at night like 23h, and never left before Mr. Romero's shift ended at 1h, he visited a few times a week when JD wasn't home (p. 40 – 42)
 - Mr. Musk visited when JD was filming Pirates and had an injured finger and a surgery in the USA (p. 44, 56 – 57) [*so it was in March 2015*]
 - 204 C: 25. 5., 18:30, Mr. Romero in the elevator, then later AH, Ms. Henriquez and Ms. Pennington trying to go down, but AH is standing outside the elevator eating sth and throwing sth over her shoulder (p. 48 – 52) [this is 0:00 – 1:23 of this [footage](#) posted by Rotten Apples on 26. 2. 2021. but! this was on 24. 5.!]
 - 204 D: 24. 5., AH, Ms. Henriquez and Ms. Pennington getting in the elevator (p. 53 – 55)
- **31. 01. 2019 – Cornelius Harrell's deposition** ([CoHa 10-01-31 dp](#) only up to p. 33), whole is exhibit 1-N in JD's opposition to motion to dismiss from 20. 5. 2020. p. 243 – 271 of pdf ([JD-OppDismiss](#)) ✓
 - Mr. Harrell started permanently working at the Eastern Columbia Building [the Eastern] in early 2016, possibly March (p. 11)
 - he had interactions with AH, but never with JD (p. 12 – 13)
 - providing the package on 22. 5. 2016, 5 – 8 min interaction somewhere between 12h – 15h (p. 13 – 16) [and he sounds a bit smitten with AH, heh]
 - surveillance cameras everywhere incl. in the package room (p. 16)

- other concierge team members at the time: Michael Wiener(?), King Joe, Trinity Esparza, Alex [Alejandro Romero], a couple part-timers (p. 18)
- **security footage from 22. 5. 2016:** 13:06 AH goes in the elevator from PH down to level one (204-G), 13:07 AH & Mr. Harrell in the hall leading to the package room & AH leaving with the package (204-I = no. 4), AH in the mezzanine going into the parking garage (204-H), 22:56-22:57 AH in the elevator going to the mezzanine then parking garage then returning with a male guest (204-L) (p. 19 – 26) [the [footage](#) with James Franco was published by Daily Mail on 26. 3. 2020, this is also 1:32–2:05 of this [footage](#) published by Rotten Apples on 26. 2. 2021; there is also the elevator [footage](#) (0:46) of AH talking to the concierge in the lobby from 22. 5. 2016, 13:00:54 – 13:02:23 and going down from the PHs area and 22. 5. 2016, 13:06:21 – 13:06:55]
- Mr. Harrell checked in for AH: her sister, Kara Devigne [Cara Delavigne], other people who may work with her or with her sister, many male guests and friends (p. 24, 26)
- AH was around more during that time [May 21-27] to us and talking to us than she has been living in there. (p. 29)
- In the weeks following 21. 5. 2016 Mr. Harrell heard from other staff that Mr. Musk was a guest of AH during a night shift. But many saw him prior to that, too. (p. 41 – 42)
- **?? 01. 2019 – Brandon Patterson's declaration** ([BrPa 10-01-?? dc](#)) is exhibit 1-P in JD's opposition to motion to dismiss from 20. 5. 2020, p. 306 – 313 of pdf ([JD-OppDismiss](#)); [listen](#) to it on Stevie J Raw's youtube channel (28. 6. 2021) ✓
 - 7. **surveillance video from evening of 24. 5. 2016** shows AH, Ms. Henriquez and Ms. Pennington at the front desk **with a pretend punch** to the face from one of AH's companions and all three laughed hard. [in Ms. Esparza's deposition the **footage with the fake punch is said to happen in front of the elevator**]
 - 15. no visible injuries of any kind on AH's face between 21. and 26. 5. 2016
 - 17. Mr. Harrell interacted with AH from 5–8 min around 13h on Sunday May 22.
 - 19. Elon Musk came to JD's penthouse shortly after the May 21 incident.
 - 20. ... surveillance cameras in the Eastern Columbia Building are ... in the elevators, lobby, and mezzanine level mailroom that exits to the parking garage.
 - 23. ... footage captured ... is recorded and maintained ... for a period of time. In 2016, that period of time was **26 days**.
 - 27. **On June 9, 2016**, ... Ms. Heard came to my office to meet with Ms. Esparza and me in person. **Ms. Heard** at that time **presented with a visible cut, bruise and injury to her face, around her cheek and eye**. [perhaps some of the photo bruises could have been taken at this time? any surveillance footage?]
 - 28. In that meeting, Ms. Heard asked me, while Ms. Esparza was present, to talk to her source at *People Magazine* to deny that building staff had made statements disputing Ms. Heard's abuse allegations.
 - 36. The surveillance footage that was sought by Mr. Depp's divorce lawyers contained images of Ms. Heard recorded in multiple days following May 21, 2016...

- 37. I was issued a subpoena to provide **87 video clips...**
- 40. A subset of the 87 surveillance video clips that I produced pursuant to the January 2019 subpoena are now preserved on a thumb drive that has been marked as Exhibit 204 in the *Bloom Hergott* case.
- **07. 03. 2019 – Camille Vasquez's omnibus declaration in support of JD's opposition to Bloom's motion to continue trial and the Depp parties' oppositions to motions to compel** ([CaVa 19-03-07 dc](#)) ✓
 - 4. Discovery in the TMG Action was wide ranging and included discovery into Mr. Depp's medical history and conditions, financial history, and alleged substance abuse, over a period of almost two decades... In total, the various parties (and non-parties) to the TMG Action produced more than 1.5 million documents, in response to hundreds of document requests.
 - 7. In all, Plaintiffs produced, on the precise schedule... 31,887 documents, totaling 97,215 pages.
 - 8. In addition... Edward White... had produced 2,718 documents, totalling 13,339 pages...
 - JD's complaint & TMG's cross-complaint (exh. 1)
 - Bloom's request for judicial notice in support of motion to compel further responses to written discovery (exh. 2)
 - protective order in TMG Action (exh. 3)
- **07. 03. 2019 – opposition to Bloom's motion to compel further responses to 1st ROGs directed to JD** ([jpg](#))
- **13. 05. 2019 – Tracey Jacobs' deposition** (TrJa 19-05-13 dp) is attachment 6, p. 255 – 387 of pdf, in AH's memorandum for motion in support of motion to compel and for relief based on JD's failure to timely produce discovery before the deposition of Tracey Jacobs from 9. 6. 2021 ([AH-Relief](#)) ✓
 - [When she started to work for Mr. Depp] he had appeared in "Platoon"... (p. 12)
 - when I signed him, he was in his second year of "Jump Street". (p. 13)
 - Is it fair to say that you basically pushed both sides to make that [Edward Scissorhands] happen? -- Yes. (p. 15)
 - Johnny is a very unique individual, so his needs for a lawyer far exceed any other client I've had. ... On weekends, vacations, and anything else, because he always needed and wanted something. (p. 20 – 21)
 - Jim Berkus and I took Johnny Depp over for a meeting with then chairman Dick Cook to kind of have a go see and to discuss potential projects between Johnny Depp and Disney. And within minutes, he said to Johnny: What kind of movies would you like to do? And Johnny answered: I'd love to do a movie that my kiddies can see. And Dick Cook responded: I have something I'm trying to make called "Pirates of the Caribbean." And Johnny looked at him, and said: I'm in. (p. 23)
 - That [Pirates] was your initiative, wasn't it? -- No, It was Jim Berkus. -- Weren't you the one who suggested it? -- Yes. But Jim actually set it up. (p. 24)
 - [Disney] wanted to make a two-picture deal with another movie. [Mr. Berkus] and I did not want him to do and – but we ended making up the deal because it was the only way to get "Pirates". They reduced the salary and he almost didn't do it, and I

talked him into doing it because I said: What's the difference if you get 500,000 dollars less than you think you should if you believe that this movie is such a hit, it's not going to matter. (p. 24 – 25)

- When was the first time... you became aware that Mr. Depp had financial problems? -- 2005; does that sound right? (p. 29)
- Because I was being pushed by Johnny day in, day out to just get him money on movies that he had no business doing because he wanted to 20-million-dollar payday, and that was the beginning of the end. Even though it was a long time ago, it certainly set a pattern for his choices. (p. 30)
- ...there were tax implications for how much time he spent in different countries. (p. 33)
- A perk list... included private planes, accommodations, per diem, how many hundreds of people that the studio would pay for him to employ. I'm exaggerating. ... And he usually, as far as I am concerned, got the best of the best in terms of that. (p. 50 – 51)
- [Christi Dembrowski] wanted to control every aspect of everything [after a couple of years of being JD's assistant and becoming more managerial] (p. 56)
- Jak [Bloom] has had one of the most extraordinary legal reputations in the business... at the height of his career. I had tremendous regard for him. (p. 58)
- "Fantastic Beasts" 3, 4, and 5 have been discussed... with both Johnny, his representatives and Warner Bros. (p. 67)
- It was a joke between the two of us. I would buy him extraordinarily expensive gifts, often with Jake, for start dates, birthdays, anniversaries, anything, and occasionally. And not for at least 11 years had he bought me anything. It was very occasionally. (p. 70)
- I was not involved in his music at all... (p. 73)
- During [JD's] divorce action, Blair Burke was his criminal lawyer and Laura [Wasser] was his divorce lawyer. (p. 92)
- [UTA] collect[s] 10 percent of all his receivables. (p. 99)
- No lawyer at a law firm is responsible for the auditing. (p. 101) [auditors are the ones who calculate the percentage of back end deals etc. and they are usually hired independently]
- explanation of what is "Pirate's pool" financial deal with producers and how hugely beneficial it was for JD, and subsequently for other actors (p. 113 – 115)
- JD's 10 million for "Pirates 1" was reduced to 6½ at the last minute (p. 116)
- And the truth is, I loved him like a brother. And it was very disappointing to have him treat me the way he did. (p. 127)
- And I made him into a movie star. (p. 128)
- email string regarding "Tyron Scaramanga loan" from 14. 4. 2015 (exh. 172)
- memorandum of agreement for *Pirates of the Caribbean* was not the deal that was ended up being agreed to and it upset JD, from 7. 8. 2002 (exh. 206)
- memorandum of agreement for *Alice in Wonderland* is what it was agreed upon, from 28. 8. 2008 (exh. 207)
- execution version of Tryon Management Services Ltd. agreement (exh. 212)

- email string with Danny Watts and Ms. Jacobs from 7. 1. 2015 (exh. 241)
 - email string from Lisa Jacobson to Ms. Jacobs and Ms. Dembrowski regarding Louis Vuitton from 30. 1. 2013 (exh. 242)
 - email string from Ms. Jacobs to several peop. incl Mr. Bloom, 22. 1. 2014 (exh. 243)
 - email string from Ms. Jacobs to several people 31. 1. 2013 (exh. 244)
 - email from P. Knapp to Ms. Jacobs from 21. 8. 2008 (exh. 245)
 - email from Michael Sinclair, chief counsel to JD's representatives (Jake Bloom), explaining conditions and commitments that JD still owed UTA even though they were terminated, with a complete list of JD's projects procured for him by UTA (exh. A), from 1. 11. 2016 (exh. 246)
 - email from Ms. Jacobs to Mr. Bloom, Mr. Mandel, Ms. Dembrowski from 20. 5. 2008 (exh. 247)
 - email string between Ms. Jacobs and Ms. Dembrowski from 30. 9. 2015 (exh. 248)
 - email from Ms. Jacobs to Mr. Mandel and Ms. Dembrowski from 2. 9. 2015 (exh. 249)
 - email string between Andrew Thau and Ms. Jacobs from 10. 9. 2015 (exh. 250)
 - email string between Ms. Dembrowski and Ms. Jacobs from 24. 3. 2016 (exh. 251)
 - email string between Ms. Jacobs, Mr. Bloom, Ms. Dembrowski, Mr. Mandel, and Mr. Schenkman, from 10. 4. 2015 (exh. 252)
 - email from Ms. Jacobs to Lionsgate from 8. 7. 2013 (exh. 253)
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- **30. 08. 2018 – notice *Johnny Depp's Former Attys Can't Enforce Oral Fee Deal*** by Daniel Siegal for Law360 ([jpg](#))
 - **09. 2020 – analysis *Assessing the Unethical Phenomenon Behind Hollywood's Handshake Agreements*** by Daniel Rico for University of Miami Business Law Review ([pdf](#))
 - **winter 2020 – analysis *Pirate's booty – Johnny Depp's lawyers walk the plank: a cautionary tale for all entertainment lawyers*** by Michael McNamara, Kirsten Hicks Spira and Brian Adesman for Association of Business Trial Lawyers Report ([jpg](#))

CA trial – Amber Heard vs Johnny Depp arbitration

2018

case no.

- **02. 10. 2018 – GQ interview** *Johnny Depp will not be buried* ([British GQ](#)) by Jonathan Heaf
 - per judge White's 3rd opinion letter from 4. 1. 2021, p. 28 of pdf, hardcopy of GQ article was published in November 2018 ([White-OpLetter3](#))
 - we don't have any legal documents, only this:
 - article *"I Was Petrified of the Monster": Johnny Depp, Amber Heard Legal Documents Shed New Light on Dual Abuse Accounts* by Ashley Cullins for [Hollywood Reporter](#) from 3. 1. 2019, 6:59, which says: "In an arbitration demand, Heard claims Depp violated that agreement and defamed her in several media outlets this fall by giving the impression that she falsely claimed to have been physically abused. The actress argues the statements, including ones made by Waldman on Depp's behalf to *THR*, were made with malice and she's entitled to punitive damages."
- **2018**

CA trial – Gregg 'Rocky' Brooks vs Johnny Depp et al.

2018 – 2022

case no. BC 713123

- **12. 04. 2017 – the incident**
 - Mr. Brooks was working as location manager on set of *City of Lies* and was involved in a series of altercations with persons on set, incl. a security guard and a possibly homeless woman who eventually was aided by Mr. Depp
 - Mr. Brooks claims that JD punched him twice
 - witnesses: Sean Bett, Emma Danoff, Brad Furman, others
 - in an interview posted by [ZE LEAKERSTV](#) on 10. 11. 2021 (29:31, the relevant comment is at 5:10 – 5:23), film's director Brad Furman has confirmed that JD didn't punch Mr. Brooks
- **06. 07. 2018 – Gregg Brook's complaint** ([complaint](#); [jpg1](#), [jpg2](#), [jpg3](#), [jpg4](#), [jpg5](#), [jpg6](#), [jpg7](#), [jpg8](#), [jpg9](#), [jpg10](#), [jpg11](#), [jpg12](#), [jpg13](#), [jpg14](#), from [deppdive](#))
 - Mr. Brooks claims the following causes of action: (1) assault and battery, (2) intentional infliction of emotional distress, (3) negligence, (4) negligent-recklessness, (5) negligent hiring and retention of unfit employee, (6) negligent supervision of employee, (7) hostile work environment, (8) wrongful termination, (9) retaliation, and (10) negligent infliction of emotional distress.
- **06. 07. 2018 – joint status report** ([jpg1](#), [jpg2](#))
- **06. 07. 2018 – notice of case management**
- **06. 07. 2018 – summons**
- **16. 07. 2018 – order to show cause hearing**
- **16. 07. 2018 – osc - failure to file proof of service**
- **16. 07. 2018 – notice of case management conference**
- **02. 08. 2018 – request for dismissal**
- **02. 08. 2018 – partial dismissal without prejudice of Good Film Productions and Miriam Segal**
- **06. 08. 2018 – notice of entry of dismissal & P/S**
- **06. 08. 2018 – six proofs of service**
- **15. 08. 2018 – JD's answer**
- **15. 08. 2018 – Miriam Segal's answer**
- **27. 08. 2018 – Emma Danoff's declaration** ([EmDa 18-08-27 dc](#)) or [here](#) ✓
 - 2. My job title was "Script Supervisor".

- 3. At 7:00 p.m. on April 12, 2017, I photographed Johnny C. Depp, II ... meeting with homeless individuals who were on the street where the *City of Lies* filming was taking place. The photograph shows Mr. Depp speaking with a small group of homeless individuals. He gave them money and gifts.
 - 4. At precisely 11:08 p.m. on the evening of April 12 ... Mr. Depp was sitting a few inches away from me on the bench looking together at the monitor. His breath did not smell of alcohol and he was not inebriated or under any influence that I could observe or had observed during a long day of work.
 - 5. At that moment, the film's location scout Rocky Brooks encountered an african-American homeless woman about 25 feet from where I was sitting with Mr. Depp. Mr. Brooks loudly and aggressively berated the woman with racial and derogatory slurs for being in his presence and in his way... I heard most of Mr. Brooks' unkind words to her.
 - 6. Mr. Depp also heard it. He immediately stood up... and went over to Brooks to stand up for the woman. Mr. Depp said to Mr. Brooks, "you can't talk to her like that. You think she is something less than you? Who do you think you are? How dare you?" ... for approximately 20 seconds, as confirmed by my photographs, and then he came and sat back down at 11:09 p.m., as confirmed by the time stamped photograph. There were no punches or shoves. There was no offer of \$100,000 to punch Mr. Depp. They were close to each other but Mr. Depp never touched Mr. Brooks. I remained 10 feet away from the incident during its short duration.
 - 7. I have 40 time stamped photographs of the entire incident.
-
- **05. 09. 2018 – minute order**

 - **22. 10. 2018 – JD's case management**
 - **23. 10. 2018 – Mr. Brooks' case management**

 - **06. 11. 2018 – case management conference**
 - **06. 11. 2018 – minute order**
 - **19. 11. 2018 – Azizian's declaration regarding failure to appear at case management conference**

 - **05. 12. 2018 – Mr. Brooks' request for dismissal**
 - **05. 12. 2018 – Mr. Brooks dismisses his 4th, 5th, 6th, 7th, 8th and 9th causes of action**
 - **11. 12. 2018 – minute order regarding sanctions as to counsel of Mr. Brooks**

 - **16. 01. 2019 – Mr. Brooks' notice of entry of dismissal and proof of service**

 - **17. 07. 2019 – JD's motion to reclassify as limited civil case**

 - **16. 08. 2019 – Mr. Brooks' opposition to motion to reclassify**
 - **26. 08. 2019 – JD's reply to opposition to motion to reclassify as limited civil case**

- **03. 09. 2019 – hearing on motion to reclassify**
- **03. 09. 2019 – minute order on motion to reclassify**
- **11. 09. 2019 – Johnny Depp's deposition** (p. 22 – 24, 26 – 27, 35, 38 – 39, 41 – 42, 48 – 49, 51, 59 – 62, 66 – 79, 86, 93 – 94, 100 – 101, 106 – 109, 114 – 115, 130 – 133, 136, 144, 149 – 154, 160 – 161, 170 - 171 are here: [JoDe 19-09-11 dp](#)); [view](#) (3:16) a tiny part on MRebeca HF's YT (27. 10. 2019), or on [deppdive](#) (3:16) ✓
 - on the producers of the film *City of Lies* (p. 22)
 - on the conflict between Ms. Segal and some other people of set which disrupted filming quite a lot early on (p. 26 – 26)
 - JD usually has two security guards when filming in Los Angeles (p. 35)
 - on the over budget of the film (p. 38 – 39)
 - on the effects of over budgeting and the solutions (p. 41 – 42)
 - on the alleged incidents from the night of 12./13. 4. 2017 (p. 48)
 - on what JD was shooting before and after *City of Lies* (p. 49)
 - on the incident with Mr. Brooks (p. 59 – 68, 114)
 - story about a young French actress being manipulated into doing nudity (p. 62)
 - on JD's conversation with Brad Furman later that night (p. 76 – 77)
 - on JD's peace talk with Mr. Brooks, with the selfie (p. 78 – 79)
 - I don't read anything from the Internet or papers... (p. 79)
 - Nathan Holmes is no longer JD's assistant (p. 93)
 - Jerry Judge and Sean Bett witnessed the interaction (p. 100)
 - on Killer Mike's cameo (p. 106 – 109)
 - on Emma Danoff (p. 130 – 133)
 - on JD's wardrobe and regular clothes on set (p. 149 – 154)
 - on Emma Danoff's [declaration](#) (p. 161)
 - on Marlon Brando (p. 170 – 171)
- **13. 09. 2019 – Gregg 'Rocky' Brooks' deposition** ([GrBr 19-09-13 dp](#))
- **13. 09. 2019 – Mr. Brooks' motion in limine no. 1**
- **13. 09. 2019 – JD's motion in limine no. 1 to bifurcate punitive damages phase of the trial**
- **13. 09. 2019 – JD's motion in limine no. 2 to exclude evidence and argument regarding alleged drug and alcohol use by JD**
- **13. 09. 2019 – JD's motion in limine no. 3 to exclude evidence and argument regarding other lawsuits**
- **13. 09. 2019 – JD's motion in limine no. 4 to exclude evidence and argument regarding disputes with AH**
- **17. 09. 2019 – Mr. Brooks' association attorney notice of association of counsel**
- **24. 09. 2019 – JD's opposition to Mr. Brooks' motion in liminie no. 1 to exclude par. 12 of the film La Monitor report**
- **25. 09. 2019 – Mr. Brooks' opposition to JD's motion in limine no. 2 to exclude evidence and argument regarding alleged drug and alcohol use by JD**

- 25. 09. 2019 – Mr. Brooks' opposition to JD's motion in limine no. 4 to exclude evidence and argument regarding disputes between JD and nonparty AH
- 30. 09. 2019 – JD's reply to Mr. Brooks' opposition to JD's motion in limine no. 2
- 30. 09. 2019 – JD's reply to Mr. Brooks' opposition to JD's motion in limine no. 4
- 02. 10. 2019 – JD's stipulation – no order of facts
- 02. 10. 2019 – JD's trial brief
- 02. 10. 2019 – JD's joint witness list
- 02. 10. 2019 – JD's joint exhibit list
- 02. 10. 2019 – JD's jury instructions joint and objected
- 02. 10. 2019 – JD's notice of deposition testimony designation and objections for deposition of Johnny Depp
- 02. 10. 2019 – JD's notice of deposition testimony designation and objections for deposition of Rocky Brooks
- 02. 10. 2019 – JD's statement of the case
- 07. 10. 2019 – Mr. Brooks' motion in limine one to exclude par. 12 of the film La Monitor report ([ipg](#))
- 07. 10. 2019 – JD's notice of amended deposition testimony designation and objections for deposition of Johnny Depp
- 07. 10. 2019 – JD's notice of amended deposition testimony designation and objections for deposition of Rocky Brooks
- 07. 10. 2019 – final status conference ([pdf/pdf](#))
- 08. 10. 2019 – JD's notice of ruling regarding motions in limine
- 09. 10. 2019 – order appointing court approved reporter ([pdf](#))
- 15. 10. 2019 – JD's motion to seal portions of JD's motion in limine no. 5
- 15. 10. 2019 – JD's brief regarding special verdict forms
- 15. 10. 2019 – JD's exhibit list
- 15. 10. 2019 – JD's amended witness list
- 15. 10. 2019 – Mr. Brooks' trial brief regarding allowable damages
- 15. 10. 2019 – JD's notice of lodging in support of JD's motion in limine no. 5
- 15. 10. 2019 – JD's notice of motion & motion in limine no. 5 to exclude expert testimony by Terre Bridgham & Camille Vasquez' declaration
- 30. 10. 2019 – Mr. Brooks' opposition to JD's motion in limine no. 5
- 06. 11. 2019 – JD's notice of lodging in support of JD's reply to Mr. Brooks' opposition to JD's motion in limine no. 5 to exclude testimony by Terre Bridgham
- 06. 11. 2019 – JD's motion to seal portions of reply to opposition to motion in limine no. 5
- 06. 11. 2019 – JD's reply to Mr. Brooks' opposition to JD's motion in limine no. 5 to exclude expert testimony by Terre Bridgham
- 08. 11. 2019 – short summary of the incident is under no. 14 of JD's response and objections to AH's 1st ROGs from the VA trial, p. 21, which are exhibit C in AH's

memorandum in support of her motion to strike JD's expert disclosures and for bifurcation, p. 42 – 68 of pdf ([AH-MemoStrikeExpert](#))

- **20. 11. 2019 – Mr. Brooks' notice of non-opposition**
- **21. 11. 2019 – notice of ruling**
- **21. 11. 2019 – minute order on motion to seal portions of JD's motion in limine no. 5 to exclude testimony by Terre Bridgham (**
- **03. 12. 2019 – minute order ([pdf](#))**
- **03. 12. 2019 – certificate of mailing ([pdf](#))**
- **06. 12. 2019 – notice of continued hearing**
- **06. 12. 2019 – notice of non-opposition**
- **2019 – Terre Bridgham's deposition (TeBr 19-??-?? dp)**
- **30. 12. 2019 – notice of ruling on motion for order sealing portions of reply to opposition to motion in limine no. 5 to exclude testimony by Terre Bridgham**
- **30. 12. 2019 – tentative order granting JD's motion for order allowing portions of Mr. Brook's reply to be maintained under seal ([jpg](#))**
- **01. 04. 2020 – Benjamin Chew's declaration to specially appear as counsel pro hac vice**
- **01. 04. 2020 – application to be admitted pro hac vice**
- **01. 04. 2020 – Camille Vasquez' declaration in support of verified application for Benjamin Chew to specially appear as counsel pro hac vice**
- **01. 04. 2020 – order ([jpg/pdf](#))**
- **01. 04. 2020 – certificate of mailing ([pdf](#))**
- **07. 05. 2020 – minute order ([pdf](#))**
- **07. 05. 2020 – certificate of mailing ([pdf](#))**
- **02. 06. 2020 – verified application and declaration of Benjamin Chew to specially appear as counsel pro hac vice on behalf of JD ([jpg](#))**
- **07. 07. 2020 – JD's proof of service**
- **08. 07. 2020 – order on motion to be admitted pro hac vice for Benjamin Chew**
- **09. 07. 2020 – JD's notice of ruling on application to be admitted as counsel pro hac vice & notice of filing of proof of service**
- **10. 02. 2021 – order granting joint stipulation to continue trial date**
- **09. 09. 2021 – joint status report of Mr. Brooks and JD**
- **29. 09. 2021 – order postponing the trial to 25. 7. 2022 ([pdf](#))**
- **29. 09. 2021 – certificate of mailing ([jpg](#))**
- **16. 10. 2021 –**

for [#JusticeForJohnnyDepp](#) by naruto uzumaki

CA trial – NGN vs Melanie Inglessis

2019 – 2020

case no. 2:20-mc-00020-UA-PJWx

- **04. 12. 2019 – Anya Goldstein's declaration** (AnGo 19-12-04 dc)
 - Ms. Inglessis would not voluntarily participate in the UK trial
- **05. 03. 2020 – NGN's urgent ex parte application for an order compelling testimony in foreign proceedings** with 12 exhibits
- **05. 03. 2020 – NGN's request for judicial notice**
- **05. 03. 2020 – NGN's civil cover sheet**
- **05. 03. 2020 – NGN's corporate disclosure statement**
- **05. 03. 2020 – notice of deficiencies**
- **06. 03. 2020 – notice of assignment**
- **10. 03. 2020 – NGN's ex parte application for an order compelling testimony in foreign proceedings**
- **11. 03. 2020 – order compelling Ms. Inglessis to provide testimony in foreign proce.**
- **17. 03. 2020 – NGN's 2nd emergency ex parte application for an order compelling testimony in foreign proceedings** with 5 exhibits
- **19. 03. 2020 – scheduling notice to Ms. Inglessis of the ex parte application**
- **20. 03. 2020 – scheduling notice**
- **20. 03. 2020 – Cesar Centeno's declaration** (CeCe 20-03-20 dc)
- **20. 03. 2020 – Ms. Inglessis' opposition to NGN's ex parte application**
- **20. 03. 2020 – meet & confer**
- **10. 04. 2020 – meet & confer**
- **29. 04. 2020 – meet & confer**
- **04. 05. 2020 – meet & confer**
- **12. 05. 2020 – meet & confer**
- **14. 05. 2020 – meet & confer**
- **16. 05. 2020 – Ms. Inglessis' notice of motion & motion to quash order compelling her to provide testimony in foreign proceeding**
 - Anya Goldstein's declaration (p. 2 – 3 of pdf, exh. 1) ✓
 - memorandum of points and authorities (p. 6 – 19 of pdf, exh. 1) ✓
 - proposed order (exh. 2)
- **29. 05. 2020 – NGN's request for judicial notice** with 5 exhibits

- **29. 05. 2020 – NGN's opposition to Ms. Inglessis' motion to quash order compelling her to provide testimony in foreign proceeding ([pdf](#), [html](#)) ✓**
 - order compelling Ms. Inglessis to give live testimony was issued on 11. 3. 2020
 - she tried to avoid live testimony by pleading health risk
 - 5 exhibits are not in pdf
- **05. 06. 2020 – Ms. Inglessis' reply in support of notice of motion & motion to quash order compelling testimony in foreign proceedings**
- **07. 06. 2020 – NGN's notice of errata**
- **10. 06. 2020 – minutes of motion to quash order compelling testimony**
- **10. 06. 2020 – amended minutes of motion to quash order compelling testimony**
- **10. 06. 2020 – NGN's opposition to Melanie Inglessis' motion to quash ([NGN-vs-Meln](#))**
- **15. 06. 2020 – Ms. Inglessis motion to quash order compelling her to provide testimony in foreign proceedings**
- **30. 06. 2020 – order denying Ms. Inglessis' motion to quash & order compelling her to provide testimony in foreign proceedings**
- **09. 07. 2020 – scheduling notice**
- **17. 07. 2020 – amended order denying Ms. Inglessis' motion to quash & order compelling her to provide testimony in foreign proceedings**
- **03. 11. 2021 – minute order**

CA trial – NGN vs Laura Divenere

2020

case no. 2:20-mc-00027-ODW

- **16. 03. 2020 – NGN's corporate disclosure statement**
- **16. 03. 2020 – NGN's request for judicial notice**
- **16. 03. 2020 – Jeffrey Smele's declaration in support of NGN's application for order compelling testimony of Laura Divenere, Melissa Saenz and Tyler Hadden ([JeSm 20-03-16 dc](#)) ✓**
 - exhibits are not in pdf
 - VA [declaration](#) of Laura Divenere from 28. 6. 2019 (exh. 1)
 - letter from Schillings to SMB with the last known contact details of officers Saenz and Hadden, from 3. 3. 2020 (exh. 3)
 - JD's UK particulars of claim (exh. 4)
 - NGN's re-amended defense (exh. 5)
 - JD's UK re-amended reply (exh. 6)
 - hearsay notice where JD first indicated he would rely on Ms. Divenere's declaration from 20. 2. 2020 (exh. 7)
 - order from UK trial from 6. 3. 2020 (exh. 8)
 - order from UK trial from 10. 3. 2020 (exh. 9)
 - text from Ms. Divenere to AH from 22. 6. 2019 (exh. 10)
 - [audio recording](#) of AH and Ms. Divenere & [transcript](#) (axh. 11 & 12)
 - article *Amber Heard's 'Friend' Goes on the Record: 'I Never Saw Amber Injured in Any Way' at the Hands of Johnny Depp* by Mike Walters for [The Blast](#) from 15. 7. 2019, 17:06 (exh. 13) [also article from [Daily Mail](#) from 17. 7. 2020, 17:20 GMT]
 - CA [deposition](#) of officer Melissa Saenz from 18. 7. 2016 (exh. 15)
 - CA [deposition](#) of officer Tyler Hadden from 18. 7. 2016 (exh. 16)
 - letters from Mr. Smele to officers Saenz and Hadden to arrange testimony from 6. 3. 2020 (exh. 17 & 18)
- **16. 03. 2020 – NGN's ex parte application for an order compelling testimony in foreign proceedings**
 - memorandum (exh. 1)
 - civil cover sheet (exh. 2)
 - declaration (exh. 3)
 - declaratino (exh. 4)
 - exhibits (exh. 5 – 23) incl.
 - [audio recording](#) of AH and Ms. Divenere & [transcript](#) (exh. 11)
- **17. 03. 2020 – notice of assignment to judge Otis Wright**
- **17. 03. 2020 – order changing the judge**

- 18. 03. 2020 – order granting NGN serving applications compelling testimony for Ms. Divenere, Ms. Saenz and Mr. Hadden
- 18. 03. 2020 – order compelling Ms. Divenere, Ms. Saenz and Mr. Hadden testimony in foreign proceedings
- 19. 03. 2020 – NGN's proof of service on Ms. Divenere
- 19. 03. 2020 – NGN's proof of service on Ms. Saenz and Mr. Hadden
- 19. 03. 2020 – minute order
- 20. 03. 2020 – Ms. Divenere's opposition to NGN's application for an order compelling testimony in foreign proceedings
- 20. 03. 2020 – Ms. Divenere's supplement request for judicial notice
- 20. 03. 2020 – Laura Divenere's declaration in support of her opposition to NGN's application for an order compelling testimony in foreign proceedings ([LaDi 20-03-20 dc](#)) ✓
 - 5. I have never consented to the recording of any conversations between myself and Ms. Heard, nor was I asked by Ms. Heard if I would permit her to record a conversation between us. ... if any audio recording ... exists ... it would have been recorded surreptitiously, without my knowledge or consent.
- 20. 03. 2020 – NGN's proof of service on Ms. Divenere's counsel
- 24. 03. 2020 – NGN's reply in support of application for order compelling testimony in foreign proceedings
- 24. 03. 2020 – Ms. Divenere's opposition to NGN's reply to opposition to NGN's application for order compelling testimony in foreign proceeding
- 25. 03. 2020 – minute order
- 27. 03. 2020 – order compelling respondents Laura Divenere, Melissa Saenz and Tyler Hadden to provide testimony in foreign proceedings via live satellite video link
- 31. 03. 2020 – Ms. Divenere's notice of withdrawal of Robert Thomspens as counsel
- 31. 03. 2020 – NGN's proof of service
- 03. 11. 2021 – minute order

CA trial – Amber Heard vs Johnny Depp / The Mandel Company

2020 – 2022

case no. 19STCP04763

- regarding subpoenas, I am not sure where were they issued, in CA or in VA
- **04. 02. 2020 – subpoena for Sean Bett** ([jpg](#))
- **04. 02. 2020 – subpoena for Stephen Deuters** ([jpg1](#), [jpg2](#))
- **30. 06. 2020 – AH's instant motion to compel for Disney**
- **30. 06. 2020 – AH's petition to enforce further responses to deposition subpoena** ([jpg1](#), [jpg2](#))
- **27. 07. 2020 – meet & confer**
- **29. 07. 2020 – AH's petition to quash JD's subpoena for CHLA**
- **29. 07. 2020 – Craig Mariam's declaration in support of petition to quash subpoena for CHLA** (CrMa 20-07-29 dc)
- **07. 08. 2020 – subpoena for LAPD**
- **10. 08. 2020 – VA subpoena for Twitter**
- **12. 08. 2020 – Craig Mariam's declaration in support of petition to quash subpoena for Jennifer Howell** (CrMa 20-08-12 dc)
 - subpoena for Jennifer Howell (exh. B)
- **12. 08. 2020 – AH's petition to stay deposition of Ms. Howell and to quash JD's subpoena duces tecum (CHLA subpoena)**
- **27. 08. 2020 – informal discovery conference** ([jpg1](#), [jpg2](#), [jpg3](#))
 - JD granted the stay all deadlines for subpoenas for Ms. Howell, Art of Elysium, Twitter, The Mandel Company, Corporate designee of Eastern Columbia Building, Brandon Patterson, Cornelius Harrel, Trinity Esparza, Alejandro Romero
 - discussion of JD's quash subpoenas to LAPD, The Mandel Company and Twitter
- **15. 09. 2020 – Johnny Depp's declaration regarding subpoenas** (JoDe 20-09-15 dc)
- **15. 09. 2020 – Amber Heard's declaration** (AmHe 20-09-15 dc)
- **?? . 09. 2020 – joint status report** ([jpg1](#), [jpg2](#))

- AH's strategy was to show that Disney did not have documents showing a link between Ms. Heard's public statements and Mr. Depp's career, so as to minimize her damages
- Disney's legal staff interviewed key document custodians and reported back to AH and her counsel stated these documents would be sufficient; then AH's new counsel said this was not good enough
- **18. 09. 2020 – informal discovery conference**
- **27. 09. 2020 – notice for IDC between AH and Disney ([jpg](#))**
- **30. 09. 2020 – request for informal discovery conference ([jpg](#))**

- **16. 10. 2020 – AH's opposition to stay deposition of Ms. Howell, to quash JD's subpoena duces tecum**
- **16. 10. 2020 – AH's opposition to quash JD's civil subpoena to CHLA**
- **16. 10. 2020 – JD's opposition to AH's petition to stay deposition of Ms. Howell and to quash JD's subpoena duces tecum (CHLA subpoena)**
- **22. 10. 2020 – AH's reply to JD's opposition to AH's petition to stay deposition of Ms. Howell and to quash JD's subpoena duces tecum (CHLA subpoena)**
- **22. 10. 2020 – notice for IDC regarding Twitter subpoena ([jpg](#))**
- **?? . 10. 2020 – part of AH's IDC status report regarding second subpoena for Twitter ([jpg](#))**
- **22. 10. 2020 – AH's reply brief in support of petition to quash JD's subpoena to CHLA**
- **22. 10. 2020 – AH's objections to JD's request for judicial notice**
- **22. 10. 2020 – John Cogger's declaration in support of reply brief in support of petition to quash JD's civil subpoena to non-party CHLA (JoCo 20-10-22 dc)**
 - Craig Mariam's declaration from 29. 7. 2020 (exh. B)
- **22. 10. 2020 – AH's brief in support of petition to stay deposition of Ms. Howell, to quash JD's subpoena duces tecum**
- **22. 10. 2020 – John Cogger's declaration in support of reply brief in support of petition to stay deposition of Ms. Howell and to quash JD's subpoena duces tecum to Ms. Howell (JoCo 20-11-22 dc)**
- **23. 10. 2020 – informal discovery conference regarding Twitter**
- **26. 10. 2020 – AH's petition for pitchess motion for LAPD ([jpg](#))**
- **29. 10. 2020 – informal discovery conference regarding Twitter**
- **29. 10. 2020 – hearing for three AH's motions to quash subpoenas for CHLA and Ms. Howell is exhibit 8 ([exh. 8](#)) in affirmation of Jessica Meyers in support of JD's petition to compel response to out-of-state subpoenas from 10. 5. 2021 ([JeMe 21-05-10 aff](#)) ✓**
 - JD is only looking for documents sufficient to verify if donations were made during the relevant time period, not the actual CHLA financial or accounting records (p. 12)
- **29. 10. 2020 – minute order denying AH's quash ([jpg1](#), [jpg2](#)) ✓**
 - AH admits she personally objected to producing responsive information or any information regarding her charitable donations to CHLA

- AH can assert no legally cognizable right to privacy in the information sought after publicly stating that she was donating her settlement proceeds to charity
 - AH's petition to quash subpoena to Ms. Howell is denied in entirety
 - AH's petition to quash subpoena to CHLA is denied, but it now excludes requests no. 3 and 4
 - AH is sanctioned for both petitions
-
- **10. 11. 2020 – Twitter's opposition to subpoena** ([jpg1](#), [jpg2](#))
 - **?? 11. 2020 – AH's writ of appeal regarding subpoena to CHLA**
 - **17. 11. 2020 – letter to CHLA regarding ruling on its subpoena and it being granted in most part** is on p. 39 – 44 of pdf of Joelle Rich's 5th UK witness statement from 14. 1. 2021 ([JoRi 21-01-14 w5](#))
 - **19. 11. 2020 – notice of hearing for AH's motion to quash certain foreign [virginia] subpoenas** ([jpg](#))
 - **19. 11. 2020 – order denying the quash of certain foreign [virginia] subpoenas** ([jpg](#)) ✓
 - **23. 11. 2020 – AH's objections to JD's proposed orders regarding petition to quash subpoena to Ms. Howell**
 - **23. 11. 2020 – AH's objection to JD's proposed order regarding petition to quash subpoena to CHLA** is on p. 303 – 305 of pdf of Joelle Rich's 5th UK witness statement from 14. 1. 2021 ([JoRi 21-01-14 w5](#))
 - **24. 11. 2020 – notice** ([jpg](#))
 - AH's objections to JD's proposed orders regarding petition to quash subpoena to CHLA from 23. 11. 2020 (exh. 1)
 - AH's objections to JD's proposed orders regarding petition to quash subpoena to Ms. Howell from 23. 11. 2020 (exh. 2)
-
- **15. 12. 2020 – AH's response to Twitter's objections** ([jpg1](#), [jpg2](#), [jpg3](#), [jpg4](#))
 - **18. 12. 2020 – order denying AH's petition to quash civil subpoena to non-party CHLA and awarding sanctions** ([jpg](#)) ✓
-
- **?? 01. 2021 – AH's IDC status report**
 - **05. 01. 2021 – subpoena for production of business records for LAPD**
 - **06. 01. 2021 – hearing on motion to quash subpoena duces tecum to Mr. Wright**
 - **13. 01. 2021 – AH's request for IDC regarding Twitter** ([jpg](#))
 - **13. 01. 2021 – notice of hearing** ([jpg](#))
 - **19. 01. 2021 – AH's request for IDC on subpoenas to Sean Bett, and Stephen Deuters, Edward White, and Edward White & Co.** ([jpg](#))
 - [email](#) from Mr. Chew to Ms. Bredehoft regarding from 18. 8. 2020
 - **25. 01. 2021 – AH's request for IDC on subpoena for LAPD and related pitchess motion** ([jpg](#), [jpg](#) of LAPD's requests)
 - **27. 01. 2021 – AH's IDC status report regarding Twitter** ([jpg1](#), [jpg2](#))
 - **27. 01. 2021 – JD's response to IDC status report re: IDC on subpoenas to Edward White & Co., Edward White, Sean Bett, and Stephen Deuters** ([jpg1](#), [jpg2](#), [jpg3](#), [jpg4](#))

- supplemental response (exh. 1) not in pdf
- letter from Mr. Chew to Ms. Bredehoft regarding privilege logs from 15. 1. 2021 (exh. 2) not in pdf
- **27. 01. 2021 – Twitter's response to 2nd subpoena** ([jpg1](#), [jpg2](#))
 - IP address information can be used to unmask anonymous speakers. Equipped with this data, AH can subpoena the relevant Internet Service Provider for the identity of the individual or entity related to each IP address.
- **?? 01. 2021 – notice for IDC** ([jpg](#))
- **?? 02. 2021 – notice**
- **03. 02. 2021 – AH's petition to quash JD's subpoena for CHLA** is on p. 279 – 288 of pdf of Joelle Rich's 5th witness statement from 14. 1. 2021 ([JoRi 21-01-14 w5](#))
- **08. 02. 2021 – iO Tillet Wright's declaration in support of motion to quash subpoena for personal appearance** ([iO 21-02-08 dc](#))
- **08. 02. 2021 – Lee Brenner's declaration in support of motion to quash iO Tillet Wright's subpoena for personal appearance** (LeBr 21-02-08 dc)
- **08. 02. 2021 – request for judicial notice filed by Mr. Wright**
- **08. 02. 2021 – non-party Disney's opposition to petition to compel further responses to deposition subpoena** ([jpg1](#), [jpg2](#))
 - still about the dispute that new AH's counsel issued that Disney must produce 'all' documents and accompanying declarations, in contrast to previous counsel
- **10. 02. 2021 – informal discovery conference**
- **10. 02. 2021 – minute order extending hearing on pitchess motion** ([jpg](#)) ✓
- **10. 02. 2021 – Mr. Wright's motion to quash his subpoena for personal appearance and subpoena duces tecum** ([jpg1](#), [jpg2](#), [jpg3](#)) ✓
 - p. 5 – 6 of VA ruling where some documents have been denied from 29. 10. 2020
- **10. 02. 2021 – JD's opposition to AH's petition for pitchess discovery, declaration of Camille Vasquez in support thereof** ([jpg](#))
- **10. 02. 2021 – non-party respondent LAPD's opposition to AH's pitchess motion** ([jpg](#))
- **10. 02. 2021 – JD's response to supplemental status report of AH re: IDC on subpoena to Twitter** ([jpg1](#), [jpg2](#), [jpg3](#), [jpg4](#))
- **19. 02. 2021 – minute order that AH's motion to compel further responses from Disney is denied, but Disney must produce privilege log** ([jpg1/jpg](#), [jpg2](#), [jpg3](#)) ✓
 - declaration of John Cogger with exhibits, one of them email from 29. 6. 2020, (exh. D) not in pdf
 - three declarations stating Disney has produced responsive records – contract records, insurance records, business records (exh. E) not in pdf
 - two supplemental declarations stating there were no responsive records regarding 'communications' from 29. 6. 2020 (exh. F) not in pdf
 - there is also an [email](#) from Alec Myers with what Disney has agreed to produce
- **24. 02. 2021 – AH's pitchess motion is denied** ([jpg](#)) ✓
- **02. 2021 – David Kipper's deposition** (DaKi 21-02-?? dp)

- 07. 05. 2021 – AH's request for judicial notice
- 07. 05. 2021 – AH's proof of service
- 07. 05. 2021 – David Murhpy's declaration in support of joinder in motion and petition to quash subpoena to Mr. Wright (DaMu 21-05-07 dc)
- 07. 05. 2021 – AH's joinder in motion and petition to quash subpoenas to Mr. Wright
- 11. 05. 2021 – specially-appearing non-party Mr. Wright's notice of withdrawas of motion to quash subpoenas ([jpg](#))
- 01. 06. 2021 – hearing on motion to quash subpoenas for Mr. Wright ([jpg](#))
- 01. 06. 2021 – AH's request for judicial notice in support of joinder in motion and petition to quash subpoena to Mr. Wright ([jpg](#))
- 14. 06. 2021 – separate statement ([jpg](#))
- 14. 06. 2021 – JD's petition to compel further responses at deposition of Mr. George ([jpg](#), are these the questions?: [jpg](#))
- 14. 06. 2021 – JD's motion to compel further responses at deposition of Mr. George
- 05. 07. 2021 – AH's request for judicial notice
- 05. 07. 2021 – AH's proof of service
- 05. 07. 2021 – David Murphy's declaration in support of joinder in motion and petition to quash subpoena to Mr. Wright (DaMu 21-07-05 dc)
- 05. 07. 2021 – AH's joinder in motion and petition to quash subpoena to iO Tillet Wright
- 19. 07. 2021 – Mr. Bett and Mr. Deuters asserted new objections for additional responsive documents
- 23. 07. 2021 – David Murhpy's declaration in support of AH's opposition to JD's petition to compel further responses at deposition of Mr. George (DaMu 21-07-23 dc)
- 23. 07. 2021 – AH's opposition to JD's petition to compel further responses at deposition of Mr. George
- 24. 07. 2021 – AH's request for IDC ([jpg1](#), [jpg2](#))
- 26. 07. 2021 – Mr. George's request for judicial notice
- 26. 07. 2021 – Mr. George's separate statement
- 26. 07. 2021 – Eric George's declaration in support of opposition to JD's petition to compel further responses at his deposition (ErGe 21-07-26 dc)
- 26. 07. 2021 – Mr. George's opposition to JD's petition to compel further responses at his deposition
- 30. 07. 2021 – JD's omnibus reply to oppositions of Mr. George and AH's petition to compel; & supplemental declarations of Samuel Moniz and Camille Vasquez ([jpg1](#), [jpg2](#), [jpg3](#))(SaMo 21-07-03 dc)(CaVa 21-07-03 dc)
- 30. 07. 2021 – JD's request for IDC to get long delayed communication and documents from Ms. Henriquez ([jpg](#))
- 05. 08. 2021 – JD's notice of petition & petition to compel further responses at deposition of Mr. George & memorandum of points and authorities & declarations of

Camille Vasquez and Samuel Moniz in support thereof ([jpg1](#))(CaVa 21-08-05 dc)(SaMo 21-08-05 dc)

- 05. 08. 2021 – hearing on motion to compel JD's petition to compel further responses at deposition of Mr. George ([jpg](#))
- 06. 08. 2021 – notice for IDC ([jpg](#))
- 10. 08. 2021 – AH's request for IDC for subpoenas to Sean Bett and Stephen Deuters ([jpg](#))
- 12. 08. 2021 – order denying JD's petition to compel further responses at deposition of Eric George ([jpg](#))
- 30. 08. 2021 – IDC ([jpg](#))
- 15. 09. 2021 – Michel Dailey's declaration in support of AH's petition for pitchess discoverey pursuant to the interstate and international depositions and discovery act (MiDa 21-09-15 dc)
- 15. 09. 2021 – AH's notice of petition & petition for pitchess discovery pursuant to the interstate and international depositions and discovery act ([jpg1](#), [jpg2](#), [jpg3](#))
- 15. 09. 2021 – memorandum of points and authorities
- 15. 09. 2021 – proof of service
- 16. 09. 2021 – proof of service
- 01. 10. 2021 – subpoena for dr. Kipper for additional documents
- 12. 10. 2021 – hearing on motion for discoverey of peace officer personnel records (pitchess motion)
- 18. 10. 2021 – notice of ruling on petition for discovery of peace officer personnel records (pitchess motion)
- 03. 11. 2021 – notice of deposition for WBEI ([jpg](#))
- 12. 11. 2021 – IDC
- 15. 11. 2021 – proof of service
- 15. 11. 2021 – response to IDC ([jpg](#)) and Michael Dailey's declaration (MiDa 21-11-15 dc)
- 16. 11. 2021 – request for IDC regarding dr. Kipper's subpoena ([jpg](#))
- 19. 11. 2021 – notice for IDC ([jpg](#))
- 22. 11. 2021 – IDC regarding the subpoena of dr. Kipper's records on JD's treatement
- 19. 01. 2022 – meet & confer
- 21. 01. 2022 – meet & confer
- 28. 01. 2022 – memorandum of points and authorities
- 28. 01. 2022 – proof of service
- 28. 01. 2022 – Michael Dailey's declaration in support of petition to enforce the subpoena for production of business records to dr. Kipper (MiDa 22-01-28 dc)
- 28. 01. 2022 – AH's notice of petition & petition to enforce subpoena for production of business records to dr. Kipper ([jpg](#))

- **28. 01. 2022 – civil case cover sheet**
- **02. 2022 – limited opposition of JD to petitioner AH's petition to enforce subpoena for production of business records to dr. Kipper** ([jpg](#))
- **2022 – WB's motion**
- **09. 02. 2022 – AH's proposed stipulation regarding WB's motion** is exhibit 6 of JD's opposition to WBEI's motion to quash subpoenas; request for sanctions; declaration of Samuel Moniz in support from 22. 2. 2022, p. 75 – 77 of pdf ([JD-oppWBquash](#); [jpg](#)) ✓
 - 1. The Parties agree that neither Ms. Heard nor Mr. Depp will include at trial any reference to Aquaman II for any reason, including but not limited to, any evidence or reference supporting or disputing Ms. Heard's damages as it relates to her Counterclaims.
 - 2. The Parties agree that neither Ms. Heard nor Mr. Depp will seek any additional discovery regarding Aquaman II for any reason, including but not limited to, agreeing not to depose... [WBEI] or seek any information relating to Aquaman II from WME or any of Ms. Heard's current or former agents or publicists. [well, if this is not screaming there is something fishy going on... are they afraid of sth?]
 - 3. [redacted] and will not question Ms. Heard, any of Ms. Heard's experts, or any fact witnesses, regarding Aquaman II in either deposition or trial.
- **09. 02. 2022 – AH's sworn ROGs**
- **10. 02. 2022 – meet & confer**
- **14. 02. 2022 – JD's limited opposition to AH's petition to enforce subpoena for production of business records to dr. Kipper**
- **18. 02. 2022 – Michael O'Connor's declaration in support of non party Warner Bros. Entertainment Inc. motion to quash JD's subpoenas and or for protective order** (MiOC 22-02-18 dc)
- **18. 02. 2022 – separate statement**
- **18. 02. 2022 – WBEI's motion to quash JD's deposition subpoena for personal appearance and production of documents and/or protective order**
- **22. 02. 2022 – Samuel Moniz's declaration** (SaMo 22-02-22 dc) is on p. 16 – 19 of JD's opposition to WBEI's motion to quash subpoenas; request for sanctions; declaration of Samuel Moniz in support from 22. 2. 2022 ([JD-oppWBquash](#)) ✓
 - subpoena for business & subpoena duces tecum records for WBEI from 2. and 3. 12. 2021 (p. 23 – 43 of pdf, exh. 1)
 - deposition subpoena for WBEI from 3. 11. 2021 (p. 45 – 58 of pdf, exh. 2)
 - AH's disclosure of expert witnesses from 11. 1. 2022 (exh. 3 under seal)
 - email chain between Mr. Moniz and WBEI's counsel from 17. – 21. 1. 2022 (p. 62 – 70 of pdf, exh. 4)
 - email from Mr. Moniz to WBEI from 3. 2. 2022 (p. 72 – 73 of pdf, exh. 5)
 - AH's proposed stipulation from 9. 2. 2022 (p. 75 – 77 of pdf, exh. 6)
 - AH's responses to ROGs from 9. 2. 2022 (exh. 7 under seal)
 - subpoena for WBEI from 22. 2. 2022 (p. 81- 99 of pdf, exh. 8)([jpg1](#), [jpg2](#), [jpg3](#))

- 22. 02. 2022 – JD's opposition to WBEI's motion to quash subpoenas; request for sanctions; declaration of Samuel Moniz in support ([JD-oppWBquash](#); also [jpg1](#), [jpg2](#), [jpg3](#), [jpg4](#), [jpg5](#)) ✓
 - Moreover, the Motion is the culmination of a series of questionable tactics on the part of WBEI to the parties... to abandon legitimate efforts to depose WBEI by, among other actions, threatening to say "bad things" about Mr. Depp and Ms. Heard, and otherwise threatening to testify about the parties in a damaging manner. When those tactics failed, WBEI filed this Motion, effectively taking the extraordinary position that it is entitled to just ignore a subpoena. (p. 2)
 - Consequently, a major disputed issue in this case is whether Ms. Heard can credibly claim to have suffered \$100 million (or any amount) in damages to her career. (p. 2)
 - Of note, **WBEI's counsel has represented in writing that Ms. Heard's suffered no adverse consequences as a result of any statements by Mr. Depp**; that any delays in picking Ms. Heard up for a role in *Aquaman 2* was either nonexistent or due to "creative issues" about Ms. Heard; and that WBEI would never have renegotiated her salary. (p. 4)
 - **WBEI has refused point blank to produce anyone for deposition, on the apparent grounds that Ms. Heard's claims are bogus...** (p. 4)
 - Mr. Depp agreed in December 2021 to accept, initially, a minimal production of documents from WBEI (its contract with Ms. Heard), and further agreed to postpone a deposition of WBEI's person most qualified... until after Ms. Heard was deposed, to avoid burdening third-party WBEI with a deposition that might prove to be unnecessary. However, it very quickly became apparent that a deposition of WBEI is necessary. (p. 5)
 - On or about February 3, 2022, counsel for WBEI sent counsel for Mr. Depp and for Ms. Heard... a letter (p. 7)
 - **Any delay in WBEI picking up Heard's option for *Aquaman 2* was due to creative issues in casting Heard** in the role of Mera for *Aquaman 2*, which were communicated to Heard's agent at the time. [well, apparently there were issues with hiring AH. *Aquaman 2*'s producer Peter Safran rejected the campaign to remove AH from the movie: '*Aquaman 2*' Producer Explains Why Fan Campaign to Fire Amber Heard Was Rejected by James Hibberd for [The Hollywood Reporter](#) from 30. 7. 2021, 10:09: "You gotta do what's best for the movie. We felt that if it's [director] James Wan and [star] Jason Momoa, it should be Amber Heard. That's really what it was."]
 - Any delay in WBEI **picking up Heard's option for *Aquaman 2* was not due to Heard's dispute with Depp or any of the allegations in this lawsuit.** [can we infer from this that but the dispute and the allegations were the cause they fired JD?]
 - WBEI would not have paid Heard more money on *Aquaman 2*, even if Heard had had more time to attempt to negotiate. (p. 7)

- Presumably as a result of behind-the-scenes pressure by WBEI, Ms. Heard's Virginia counsel subsequently offered a stipulation [redacted, but see above under 9. 2. 2022] ... Mr. Depp rejected Ms. Heard's proposed stipulation. (p. 7 – 8)
- Ms. Heard's Subsequent Interrogatory Responses **Under Penalty Of Perjury**. Late on February 9, 2022,... Ms. Heard served sworn interrogatory responses... [which are all redacted] (p. 8)
- On... February 10, 2022,... met and conferred... **Counsel for WBEI asserted that Mr. Depp has been "given a gift" as a result of Ms. Heard's proposed stipulation, and that Mr. Depp's counsel should "be careful what you wish for", threatening** that if forced to give a deposition WBEI would give testimony damaging or embarrassing to Mr. Depp. **[are these meets & confers taped?]** ... On... February 16, 2022, Mr. Depp's lead Virginia counsel received an unsolicited telephone call from WBEI's chief counsel, urging Mr. Depp to abandon any deposition of WBEI, and **warning that WBEI's representatives would say "bad things" about both Mr. Depp and Ms. Heard if a deposition took place.** (p. 9 – 10)
- Mr. Depp's Proposed Narrowed Parameters [see subpoena] (p. 10 – 11)
- The fact that Ms. Heard has never been fired from *Aquaman 2* is directly relevant to the issue of damages. (p. 13)
- declaration of Samuel Moniz, with exhibits, from 22. 2. 2022 (p. 16 – 19 + 20 – 99)
- **22. 02. 2022 – notice of lodging documents conditionally under seal in opposition to WBEI's motion to quash**
- **22. 02. 2022 – JD's motion to seal portions of opposition to motion to WBEI's motion to quash & declaration of Samuel Moniz in support** (SaMu 22-02-22 dc)
- **22. 02. 2022 – subpoena for WBEI** ([jpg1](#), [jpg2](#), [jpg3](#)) ✓
 - requests 14 – 16: ..."[a]s WBEI communicated to Heard's agent at the time, **there were creative concerns** with continuing to cast Heard in the role of Mera for *Aquaman 2*, the subject of which were communicated to Heard's agent." **[why three same requests? JD has removed all requests not related to Aquaman.]**
- **25. 02. 2022 – JD's ex parte application to advance and specially set hearing on motion to quash on shortened time**
- **02. 2022 – JD's subpoena for Samantha Spector**
- **02. 2022 – notice of motion and motion for protective order re deposition of non-party Samantha Spector and to stay taking of deposition pending determination of motion for protective order** ([jpg](#))
- **02. 2022 – memorandum and authorities in support of motion for protective order re deposition of non-party Ms. Spector and motion to stay taking of deposition pending determination of motion for protective order** ([jpg](#))
 - [\[photo\]](#) of Samantha Spector with AH on the day AH filed for TRO]
- **02. 2022 – Sebastian van Roundsburg's declaration in support of AH's joinder motion and motion to file and maintain under seal** (SeRo 22-02-?? dc)([jpg](#))
- **02. 2022 – WBEI's response** ([jpg1](#), [jpg2](#), [jpg3](#), [jpg4](#), [jpg5](#))
 - [AH] has attempted to withdraw the very claim that provided [JD]'s grounds for seeking WBEI's deposition **[but did she?]**

- ...[AH]'s "Talent Option" agreement, dated September 21, 2015 [*while she was with JD who probably helped her get the role*]..., as well as the March 24, 2017 letter exercising the option for *Aquaman* under the Option Agreement and the June 3, 2021 letter exercising the option for *Aquaman 2* under the Option Agreement are attached... [AH has been saying that she is returning to AQ2 in November 2020 already, see *Amber Heard says she'll return for Aquaman 2: 'I'm excited to get started'* by James Hibberd for [Entertainment Weekly](#) from 12. 11. 2020, 16:13 EST, or *Amber Heard confirms Aquaman 2 return* by Gary Collinson for [flickeringmyth](#) from 12. 11. 2020. she has also been associating herself with AQ2 in March, April and May 2021, posting pictures of her training from the filming of AQ1, see retweets from her [Instagram](#), [Instagram](#), [Instagram](#), [Instagram](#). Ryan Parker [tweeted](#) on 28. 2. 2021 that AH hasn't been fired from AQ2; also *Amber Heard has not been fired from Mera role in Aquaman 2* by Gary Collinson for [flickeringmyth](#) from 3. 3. 2021. huh. she hasn't even been hired yet!]
- Ms. Heard did not suffer any adverse employment action by Warner Bros. in connection with either *Aquaman* or *Aquaman 2* because of any of the allegedly defamatory statements by John C. Depp, II... or Adam Waldman... that are alleged in her Counterclaim... Ms. Heard's compensation for *Aquaman* or *Aquaman 2* was not reduced because of the Counterclaim Statements.
- Ms. Heard filmed *Aquaman 2* between July 15, 2021 and November 16, 2021.
- AH's talent option agreement with WB from 15. 9. 2015 (att. A)
- AH's option agreement for *Aquaman* from 24. 3. 2017 (att. B)
- AH's option agreement for *Aquaman 2* from 3. 6. 2021 (att. C)
- **03. 03. 2020 – hearing**
- **03. 03. 2022 – order denying WBEI's motion to quash its subpoena but granting its motion for protective order ([jpg](#))**
- **17. 03. 2022 – WBEI's deposition**

NY trial – Johnny Depp vs ACLU

2021

case no. 154545/2021

- 05. 03. 2021 – meet & confer
- 16. 03. 2021 – meet & confer
- 05. 04. 2021 – meet & confer

- 10. 05. 2021 – JD's notice of petition to compel response to out-of-state subpoenas ([jpg](#))
- 10. 05. 2021 – affirmation of Jessica Meyers in support of JD's petition to compel response to out-of-state subpoenas ([JeMe 21-05-10 aff](#)) ✓
 - 2. The Complaint alleges that, in her Op-Ed, Ms. Heard republished a false claim she first made in May 2016, when she sought a temporary restraining order and divorce from Mr. Depp...
 - JD's [complaint](#) with exhibits A – C from 1. 3. 2019 ([exh. 1](#))
 - articles covering JD's and AH's divorce and AH's public statement about donations: *Amber Heard to donate \$7M Depp divorce settlement to charities* by Elle Hunt for [The Guardian](#) from 18. 8. 2016, 23:11 ET; *Amber Heard donates Johnny Depp divorce settlement to charity: Read her statement in full* by Olivia Blair for [Independent](#) from 19. 8. 2016, 11:30; *Amber Heard Donates Johnny Depp's \$7 Million Divorce Settlement To Charity; Could Face Huge Tax Bill* by Toni Nitti for [Forbes](#) from 21. 8. 2016, 14:11 EDT; *Amber Heard donates \$7M Johnny Depp divorce settlement to children's hospital, charities* by Katherine Lam for [Fox News](#) from 10. 4. 2018 ([exh. 2](#))
 - declaration of Amber Heard from 4. 9. 2019 ([exh. 3](#))
 - 3rd UK [witness statement](#) of Amber Heard from 26. 2. 2020 ([exh. 4](#))
 - JD's 3rd RFPs from 14. 8. 2020 ([exh. 5](#))
 - AH's responses and objections to JD's 3rd RFPs from 4. 9. 2020 ([exh. 6](#))
 - order denying AH's motions *in limine* to exclude evidence concerning the amount of her charitable donations from 25. 9. 2020 ([exh. 7](#))
 - transcript of hearing regarding CHLA from 29. 10. 2020 ([exh. 8](#))
 - order denying AH her CHLA petition from 18. 12. 2020 ([exh. 9](#))
 - [UK judgement](#) from 2. 11. 2020 ([exh. 10](#))
 - order de-designating CHLA documents from confidential, from 16. 12. 2020 ([exh. 11](#))
 - transcript of hearing granting JD's motion to compel responses to requests 44 – 47 from 3rd RFPs, from 18. 12. 2020 ([exh. 12](#))

- order directing AH to produce documents regarding requests 44 – 47 of 3rd RFPs, from 30. 12. 2020 ([exh. 13](#))
- ACLU documents from AH's production of documents responsive to 44 – 47 of 3rd RFPs from 4. 1. 2021 ([exh. 14](#))
- CHLA documents from AH's production of documents responsive to 44 – 47 of 3rd RFPs from 4. 1. 2021 ([exh. 15](#))
- [UK judgement on appeal](#) from 25. 3. 2021 ([exh. 16](#))
- declaration of Benjamin Wizner from 22. 1. 2021 ([exh. 17](#))
- subpoena *duces tecum* to ACLU Foundation from 4. 2. 2021 ([exh. 18](#))
- subpoena *ad testificandum* to ACLU Foundation from 4. 2. 2021 ([exh. 19](#))
- subpoena *duces tecum* to Benjamin Wizner from 4. 2. 2021 ([exh. 20](#))
- subpoena *ad testificandum* to Benjamin Wizner from 4. 2. 2021 ([exh. 21](#))
- subpoena *duces tecum* to Anthony Romero from 4. 2. 2021 ([exh. 22](#))
- subpoena *ad testificandum* to Anthony Romero from 4. 2. 2021 ([exh. 23](#))
- Mr. Wizner's responses and objections to subpoenas from 1. 3. 2021 ([exh. 24](#))
- AH's objections to Mr. Wizner's subpoenas from 1. 3. 2021 ([exh. 25](#))
- protective order from VA Action ([exh. 26](#))
- email from ACLU Foundation's counsel that they are authorized to accept service of Mr. Romero's subpoenas from 19. 3. 2021 ([exh. 27](#))
- email with ACLU Foundation's responses and objections from 24. 3. 2021 ([exh. 28](#))
- email from ACLU with attached proposed addendum to protective order, from 25. 3. 2021 ([exh. 29](#))
- email with Mr. Romero's responses and objections from 2. 4. 2021 ([exh. 30](#))
- AH's objections to ACLU Foundation's subpoena from 2. 4. 2021 ([exh. 31](#))
- AH's objections to Mr. Romero's subpoena from 2. 4. 2021 ([exh. 32](#))
- email stating that JD will address the confidentiality dispute in forthcoming motion to compel compliance with subpoenas from 6. 4. 2021 ([exh. 33](#))
- **10. 05. 2021 – JD's notice for petition** ([jpg](#))
- **10. 05. 2021 – JD's petition to compel response to out-of-state subpoenas** ([jpg](#)) ✓
 - this is about subpoenas *duces tecum* to ACLU Foundation, *ad testificandum* to ACLU Foundation, *duces tecum* to Mr. Wizner, *ad testificandum* to Mr. Wizner, *duces tecum* to Mr. Romero, *ad testificandum* to Mr. Romero
- **10. 05. 2021 – JD's memorandum in support of petition to compel response to out-of-state subpoenas** ([JD-MemoOutOfStateSubp](#))
- **13. 05. 2021 – certificate of service for Jessica Meyers** ([jpg](#))
- **27. 05. 2021 – JD's petition**
 - **ACLU pledge form which states that AH "pledge[s] to make a gift to the Centennial Campaign in the amount of \$3,500,000.00" and "[p]ayments will begin on ... 8/19/2016"**
- **01. 06. 2021 – JD's rejected ACLU's proposed stipulation**
- **04. 06. 2021 – affirmation of Stephanie Teplin in support of ACLU's opposition to JD's petition to compel responses to out-of-state subpoenas** ([StTe 21-06-04 aff](#)) ✓

- 15. In anticipation of making a production on April 9, the ACLU Non-Parties ... identified, reviewed, and prepared ... over 500 emails and documents related to the drafting, editing, and placement of the Op-Ed.
- 25. Mr. Depp's counsel stated that Mr. Depp intended to use the ACLU Non-Parties' documents and testimony in unspecified current or future proceedings other than the Virginia Action.
- AH's opposition to JD's motion to deny the remainder of her plea in bar and her anti-SLAPP defense from 22. 1. 2021 ([exh. A](#))
- VA court decision that AH's op-ed is of public concern from 3. 2021 ([exh. B](#))
- transcript of hearing from 23. 10. 2020 ([exh. C](#))
- order resetting VA trial from 22. 2. 2021 ([exh. D](#))
- email from Mr. Schwartz to JD's counsel from 18. 3. 2021 ([exh. E](#))
- email exchange between both counsels regarding the protective order from 2. 4. 2021 ([exh. F](#))
- justice Schechter's model confidentiality order ([exh. G](#)), also [here](#)
- justice Masley's model confidentiality order ([exh. H](#)), also [here](#)
- The New York City Bar Association's model confidentiality order ([exh. I](#)), also [here](#)
- email from JD's counsel from 6. 4. 2021 ([exh. J](#))
- image of [ACLU's website](#) as of 2. 6. 2021 ([exh. K](#))
- image of [Mr. Romero page](#) of ACLU's website as of 2. 6. 2021 ([exh. L](#))
- image of [ACLU's history page](#) as of 2. 6. 2021 ([exh. M](#))
- **04. 06. 2021 – ACLU's memorandum to JD's petition to compel responses to out-of-state subpoenas ([ACLU-MemoOppJDsPetit](#))**
- **07. 06. 2021 – affidavit of service for Michael Schwartz ([jpg](#))**
- **08. 06. 2021 – affirmation of Jessica Meyers in further support of JD's petition to compel response to out-of-state subpoenas ([JeMe 21-06-08 aff](#)) ✓**
 - email from Ms. Meyers to ACLU's counsel from 10. 3. 2021 ([exh. 1](#))
 - emails between JD and ACLU counsel regarding missing documents from 26. 3. 2021 ([exh. 2](#))
 - order stating that AH's communications with ACLU with respect to the op-ed are not privileged, from 12. 5. 2021 ([exh. 3](#))
 - email from ACLU with a draft stipulation of dates and amounts of AH's donations from 27. 5. 2021 and the response email from 1. 6. 2021 ([exh. 4](#))
- **08. 06. 2021 – JD's reply memorandum in further support of petition to compel response to out-of-state subpoenas ([JD-ReplyMemo](#))**
- **14. 06. 2021 – notice of motion for admission *pro hac vice* for Benjamin Chew ([pdf](#))**
- **14. 06. 2021 – affirmation of Jessica Meyers in support of motion *pro hac vice* admission of Benjamin Chew ([jpg](#))**
- **14. 06. 2021 – affidavit of Benjamin Chew in support of motion for *pro hac vice* admission ([jpg](#))**
 - certificate of good standing from district of columbia bar ([exh. A](#))
 - certificate of good standing from virginia state bar ([exh. B](#))
- **14. 06. 2021 – proposed order for admission *pro hac vice* of Benjamin Chew ([jpg](#))**

- 23. 06. 2021 – order for admission *pro hac vice* of Benjamin Chew ([jpg](#))
- 25. 06. 2021 – decision + order on motion *pro hac vice* of Benjamin Chew ([jpg](#))
- 22. + 29. 07. 2021 – decision + order granting JD all documents except those relating to AH's role as ACLU ambassador ([jpg](#))
- 03. 08. 2021 – notice of entry ([jpg](#)) with attached order from 22. 7. 2021
- 03. 08. 2021 – certificate of service ([jpg](#))
- 02. 09. 2021 – Mr. Romero's notice of motion for leave to reargue ([jpg](#))
- 02. 09. 2021 – affirmation of Stephanie Teplin ([StTe 21-09-02 aff](#)) ✓
 - subpoena to Anthony Romero from 4. 2. 2021 ([exh. 1](#))
 - subpoena to ACLU's corporate designee from 4. 2. 2021 ([exh. 2](#))
 - subpoena to ACLU Foundation from 4. 2. 2021 ([exh. 3](#))
 - subpoena to Benjamin Wizner from 4. 2. 2021 ([exh. 4](#))
 - subpoena to Benjamin Wizner from 4. 2. 2021 ([exh. 5](#))
 - subpoena to Anthony Romero from 4. 2. 2021 ([exh. 6](#))
 - JD's memorandum in support of petition to compel response to out-of-state subpoenas, for full compliance with the subpoenas, from 10. 5. 2021 ([exh. 7](#))
 - ACLU's opposition to JD's petition to compel response to out-of-state subpoenas from 4. 6. 2021 ([exh. 8](#))
 - affirmation of Stephanie Teplin from 4. 6. 2021 ([exh. 9](#))
 - JD's reply memorandum in further support of petition to compel response to out-of-state subpoenas from 8. 6. 2021 ([exh. 10](#))
 - decision from 22. 7. 2021 and order from 29. 7. 2021 ([exh. 11](#))
 - JD's notice of entry of the decision from 3. 8. 2021 ([exh. 12](#))
 - image of [Mr. Romero page](#) of ACLU's website as of 2. 6. 2021 ([exh. 13](#))
 - image of [ACLU's history page](#) as of 2. 6. 2021 ([exh. 14](#))
- 02. 09. 2021 – ACLU's memorandum in support of Mr. Romero's motion to reargue ([Romero-MemoMotReargue](#))
- 20. 09. 2021 – ACLU's reply in further support of Mr. Romero's motion to reargue ([Romero-ReplyMotReargue](#))
- 21. + 26. 10. 2021 – decision + order granting Mr. Romero's motion to reargue – Mr. Romero must sit for his deposition ([jpg](#)) ✓
- 18. 04. 2022 – notice of motion for production expenses pursuant to CPLR 3111 and 3122(d) ([pdf](#))
- 18. 04. 2022 – affidavit or affirmation in support of Stephanie Teplin ([StTe 22-04-18 aff](#))
 - summary of expenses ([exh. 1](#))
 - biography of Michael Schwartz ([exh. 2](#))
 - biography of Charlotte Allyn ([exh. 3](#))

- summary of costs ([exh. 4](#))
- **18. 04. 2022 – memorandum in support of ACLU's motion for production expenses**
([pdf](#))

CO trial – Johnny Depp (Adam Waldman) vs Amber Heard

8. 9. 2021 – 2022

case no. 2021 CA 000251 2

appeal case no. 21-CV-0633 & 21-CV-0634

- **04. 02. 2021 – Mr. Waldman is served his subpoena**
- **23. 02. 2021 – JD's emergency motion to quash AH's subpoena to Mr. Waldman**
- **24. 02. 2021 – JD's objections to Mr. Waldman's subpoena**

- **05. 03. 2021 – AH's opposition to JD's emergency motion**

- **10. 08. 2021 – status conference**
- **10. 08. 2021 – order denying JD's emergency motion to quash subpoena to Mr. Waldman**
 - **4. Nothing in this order precludes Plaintiff Johnny C. Depp from raising objections for privilege to specific questions during the deposition, if Plaintiff deems it appropriate.**
- **08. 2021 – Mr. Waldman's responses and objections to subpoena**

- **08. 09. 2021 – JD's notice of appeal**
- **08. 09. 2021 – Mr. Waldman's notice of appeal**
- **14. 09. 2021 – record index**
- **21. 09. 2021 – meet & confer where Mr. Waldman confirmed intention to produce documents and/or initial privilege log**
- **24. 09. 2021 – order consolidating appeal & directing mediation screening statement & directing Mr. Waldman to register for court's mandatory e-filing**
- **29. 09. 2021 – mediation screening statement**

- **04. 10. 2021 – status conference**
- **04. 10. 2021 – mediation screening statement**
- **07. 10. 2021 – referred to mediation**
- **11. 10. 2021 – JD's motion to stay in D.C. superior court**
- **25. 10. 2021 – JD's appendix**
- **25. 10. 2021 – JD's opening brief to court of appeals**
- **27. 10. 2021 – screened out**
- **28. 10. 2021 – order screening out & briefing order**

- **08. 11. 2021 – order denying JD's motion to stay discovery**

- **10. 11. 2021 – status conference**
 - Gibson Dunn [Mr. Waldman's now former counsel] has no right, no right whatsoever to produce any documents without Mr. Depp having the opportunity to review those. ... Mr. Waldman does not own the privilege. Mr. Depp owns the privilege. (p. 11)
- **12. 11. 2021 – meet & confer**
- **12. 11. 2021 – JD's court of appeals motion to stay discovery / lower court order**
- **12. 11. 2021 – JD's court of appeals motion for expedited ruling**
- **15. 11. 2021 – AH's demands for privilege logs and deposition date**
- **16. 11. 2021 – AH's response to JD's motion to stay discovery**
- **17. 11. 2021 – AH's motion & memorandum to compel compliance with subpoena served on Mr. Waldman ([pdf](#)) ✓**
- **19. 11. 2021 – Mr. Waldman's joinder in appellant JD's motion to stay discovery**
- **19. 11. 2021 – JD's reply to AH's opposition to his motion to stay discovery**
- **19. 11. 2021 – JD's reply to AH's response to his motion to expedite**
- **23. 11. 2021 – AH's court of appeal brief on JD's appeal on Aug 10th ruling**
- **23. 11. 2021 – production of documents**
 - to date, in VA JD has produced 44,477 pages of responsive documents in response to 16 RFPs; AH has only produced 17,107 pages
- **24. 11. 2021 – AH's redacted brief**
- **30. 11. 2021 – court of appeals' order denying JD's motion to stay discovery & expedited ruling**
- **01. 12. 2021 – third-party witness Mr. Waldman's opposition to AH's motion to compel ([pdf](#)) ✓**
- **01. 12. 2021 – JD's opposition to AH's motion to compel compliance with Waldman subpoena ([pdf](#)) ✓**
 - Obviously, Mr. Depp has claims of privilege and personal interest in the subpoenaed matter as it is undisputed that Mr. Waldman is Mr. Depp's attorney. (p. 7)
- **03. 12. 2021 – AH's reply supporting motion to compel Mr. Waldman and JD's compliance with the subpoena served on Mr. Waldman ([pdf](#)) ✓**
- **15. 12. 2021 – JD's redacted reply brief**
- **16. 12. 2021 – Mr. Waldman's appearance by Stephen Braga**
- **16. 12. 2021 – AH's motion to dismiss appeal**
- **17. 12. 2021 – Mr. Waldman's counsel's motion to withdraw**
- **28. 12. 2021 – AH's reply in support of her motion to dismiss JD's appeal**
- **07. 01. 2022 – action – ready for calendaring – summary**
- **28. 01. 2022 – order that Mr. Waldman shall within 20 days submit brief and appendix, with a motion for leave to file out of time & order that AH's motion to dismiss appeal is held in abeyance & order granting withdrawal of Jeffrey Rosenberg**

- **15. 02. 2022 – Adam Waldman's deposition** (AdWa 22-02-15 dp)
- **16. 02. 2022 – Mr. Waldman's motion to dismiss appeal**

VA trial – Johnny Depp vs Amber Heard

1. 3. 2019 – 2022

civil action no. CL-2019-0002911

- **02. 10. 2018 – GQ interview** *Johnny Depp will not be buried* ([British GQ](#)) by Jonathan Heaf
 - per judge White's 3rd opinion letter from 4. 1. 2021, p. 28 of pdf, hardcopy of GQ article was published in November 2018 ([White-OpLetter3](#))
- **18. 12. 2018 – the Washington Post Op-Ed** *The Washington Post Op-Ed Amber Heard: I spoke up against sexual violence – and faced our culture's wrath. That has to change.* ([Washington Post](#))
- **19. 12. 2018 – hardcopy of the Washington Post op-ed** titled *A Transformative Moment For Women*
- **01. 03. 2019 – JD's complaint** *complaint* ([JD-Complaint](#), [pdf2](#), [pdf3](#)) is also on p. 11 – 65 of pdf, with exhibits!, in the subpoena for Wasser, Cooperman & Mandels P.C. from 7. 1. 2021 ([pdf](#)) ✓
 - 3. **89 newly obtained surveillance camera videos**
 - 5. Ms. Heard's hoax allegations were timed to coincide with the day that Mr. Depp's film, *Alice Through the Looking Glass*, was released in theatres. ... And indeed, just four days after Ms. Heard's op-ed was published on December 18, 2018, Disney announced on December 22, 2018 that it was dropping Mr. Depp from his leading role as Captain Jack Sparrow ... in the ... *Pirates of the Caribbean* franchise.
 - 6. Ms. Heard revived her false allegations against Mr. Depp in the op-ed to generate positive publicity for herself and to promote her new movie *Aquaman*, which premiered across the United States and in Virginia only three days after the op-ed was first published.
 - 8. Mr. Depp was married to Ms. Heard for approximately 15 months between February 1, 2016 and May 23, 2016.
 - 15. Unbeknownst to Mr. Depp, no later than one month after his marriage to Ms. Heard, she was spending time in a new relationship with ... Elon Musk. ... while Mr. Depp was out of the country filming in March 2015 – [Eastern] personnel testified that Ms. Heard received Musk "late at night" at Mr. Depp's penthouse.
 - 17. Although much of this exculpatory evidence was collected by certain members [of] Mr. Depp's then-legal team in 2016, it only recently came into Mr. Depp's possession, as it has been hidden from him for a period of years. [**why? this to do with him firing and then taking to court that legal counsel?**]

- 25. On September 14, 2009, a police officer at the Seattle-Tacoma International Airport witnessed Ms. Heard physically assault her then-domestic partner, Tasya van Ree. [[the conditions of release](#) for the "assault" were issued on the 15th, and AH was "unconditionally released from the King County Jail". why is there a 'decline' written beside that?][[audio](#) (1:03) and [transcript](#) of the court hearing]
- 34. Mr. Depp ... left Los Angeles for many weeks almost immediately after the alleged incident. [May 21, 2016]
- 73. Just two days after the op-ed appeared in the *Washington post*'s online edition, Disney publicly announced that Mr. Depp would no longer be a part of the *Pirates of the Caribbean* franchise. [[er, up under par. 5 there were four days](#)]
- article *Amber Heard: I spoke up against sexual violence – and faced our culture's wrath. That has to change.* for [Washington Post](#) from 18. 12. 2018 (p. 42 – 45 of pdf, exh. A)
- article *A transformative moment for women* by Amber Heard for The Washington Post on 19. 9. 2018 (p. 47 – 48 of pdf, exh. B)
- AH's [tweet](#) about the op-ed from 19. 12. 2018, 22:32 (p. 50 of pdf, exh. C)
- receipt for JD's complaint from 1. 3. 2019 (p. 51 of pdf)
- counsel of record for all parties regarding subpoenas from 23. 12. 2020 (p. 52 – 65 of pdf)
- email from Ms. Bredehoft to Mr. Frey from 23. 12. 2020 (p. 65 of pdf)
- **01. 03. 2019 – civil case summary sheet** ([pdf](#))
- **04. 03. 2019 – proof of service** ([pdf](#))
- **11. 03. 2019 – letter from reporter** ([pdf](#))
- **19. 03. 2019 – calendar control order** ([pdf](#))
- **19. 03. 2019 – agreed order** ([pdf](#))
- **26. 03. 2019 – letter from AH requesting judge pre-assignment** ([pdf](#))
- **29. 03. 2019 – letter from JD opposing judge pre-assignment** ([pdf](#))
 - JD's complaint, with exhibits A and B, from 1. 3. 2018 (p. 4 – 33 of pdf, exh. 1)
 - opinion letter from 4. 10. 2005 (p. 45 – 56 of pdf, exh. 2)
- **10. 04. 2019 – Amber Heard's declaration** (AmHe 19-04-10 dc) is part of her memorandum in support of her motion to dismiss from 11. 4. 2019, p. 24 – 282 ([brief-sched](#)), and exhibit 2 in JD's memorandum in support of his motion to compel AH's production of original devices and operating system drives and cloud backups as requested in his 7th RFPs from 24. 9. 2021, p. 23 – 280 of pdf ([JD-MemoDeviceDriveCloud](#)); pictures are very bad black/white copies ✓
 - 1. ...we started dating around the end of 2011 or early 2012.
 - 3. [Johnny] frequently went in and out of drug and alcohol dependency medical care, including 24-hour live-in medical aid **for the last three years** of our relationship. [[why then is this person never mentioned when abuse took place?](#)]
 - 4. Eventually ... **I began to document the injuries and destruction with photographs or videos** so that I could show Johnny what he had done while in his altered state. [[is this an admission of collecting potential damaging 'evidence' or an attempt to](#)

explain said collecting of 'evidence'? in fact, is this her usual modus operandi? why haven't we seen any of those damaging videos?]

- no mention of incident 3 yet (Hicksville)
- 14.-17. On **March 3, 2015, I arrived in Australia** to meet Johnny... the next morning ... that night ... While smashing the phone, Johnny severely injured his finger,... On the third day... I found numerous messages...
- 18. By the time I got the security guards to come upstairs, it had been almost 24 hours now since Johnny had cut off his finger. ... so he was rushed to the hospital.
- 50. I was dropped from a global fashion brand's upcoming campaign. [which?]
- 51. I have never physically abused anyone. [yet you admit it yourself in audios]
- AH's VA declaration itself (p. 24 – 38 of pdf)
- [texts](#) between AH and JD regarding the tattoo incident from 12. 3. 2013, 14:37 (p. 40 of pdf, exh. 1) [I have to admit that calling someone you love 'bitch' and 'cunt' is not my idea of being nice, but maybe she liked that sort of stuff? she did call herself "this blonde Texan bitch" in the 'love letter' from 2012][12. 3. 2013 was Tuesday, so "last Friday night" was 8. 3. 2013]
- [text1](#), [text2](#), [text3](#), [text4](#) between AH and JD regarding the plane incident and her filming 'the James Franco piece' from 25. 5. 2014. 10:42 – ? (p. 42 – 45 of pdf, exh. 2) [the texts were published in *Johnny Depp's brutal texts to Amber Heard where he taunts her for filming 'greased up pig' love scene with James Franco and calls himself a f*****g savage* by Jennifer Smith for [Daily Mail](#) from 12. 4. 2019, 22:18 GMT]
- list of [text1](#), [text2](#), [text3](#), [text4](#) between AH and Stephen Deuters regarding the plane incident from 25. 5. 2014. 4:13 – 22:15 (p. 47 – 48 of pdf, exh. 3) [the texts between Mr. Deuters and AH after the Boston plane incident were published in *Amber Heard's Texts From 2014 Detail Alleged Assault by Johnny Depp: 'He's Done This Many Times'* by Jackie Willis for [etonline](#) from 1. 6. 2016, 13:15 PDT; and also in *Amber Heard's Texts from 2014 Allegedly Show History of Assaults by Johnny Depp* by Michael Miller for [People](#) from 1. 6. 2017, 19:00]
- three [photos](#) of a damaged door from 17. 8. 2014 (p. 50 – 51 of pdf, exh. 4)
- [text1](#) and [text2](#) between AH and nurse Debbie Lloyd and dr. Kipper regarding Bahamas detox from 17. and 18. 8. 2014, 9:05 – 6:45 (p. 53 – 55 of pdf, exh. 5)
- [text1](#), [text2](#) between AH and JD from 17. 12. 2014, 18:04 – 22:04 (p. 57 – 58 of pdf, exh. 6) [the texts were published in *Johnny Depp's brutal texts to Amber Heard where he taunts her for filming 'greased up pig' love scene with James Franco and calls himself a f*****g savage* by Jennifer Smith for [Daily Mail](#) from 12. 4. 2019, 22:18 GMT]
- four photos ([photo1](#), [photo2](#), [photo3](#), [photo4](#)) of graffiti on the bathroom mirror from Australia from 4./5. 3. 2015 (p. 60 – 64 of pdf, exh. 7)
- [photo](#) of two scratches on AH's arm from 3. 2015 (p. 65 of pdf, exh. 8) [and that's all the photos of a three-day abuse ordeal. seriously?]
- texts with photos of alleged damage to PH5 between Whitney Henriquez and Kevin Murphy from 23. 3. 2015, 6:57 – 8:35 (p. 67 – 71 of pdf, exh. 9) [the same PH5 that was perfectly fine when the first set of officers swept the area]

- p. 378 – 380 of [deposition](#) of Amber Heard from 13. 8. 2016, Vol. II. (p. 73 – 78 of pdf, exh. 10 & 11) [AH is afraid to answer with a 'yes' or 'no', she prefers to elaborate her story even further]
- [photo](#) of clump of hair with a female finger from 15. 12. 2015 (p. 80 of pdf, exh. 12) [where are the roots and the scalp and the blood? this is way too short to be her whole length of hair she had at the time pulled out of her scalp. it's about, what, 13 cm in total? is it even her hair? thanks for the finger, btw, so we can estimate the length of hair.]
- [photo](#) of splintered bedframe with the folded knife from 15. 12. 2015 (p. 80 of pdf, exh. 12) [the folded knife is an interesting addition, no? and I'm sorry but I don't see a body-shaped imprint in the bedding.]
- photos of alleged damage to AH's face from 16. 12. 2015 (photo1, photo2, photo3, photo4, photo5, photo6, photo7, photo8, photo9, photo10, photo11) (p. 83 – 93 of pdf, exh. 13)
- [photo](#) of AH's scalp from 15. 12. 2015 (p. 94 of pdf, exh. 13)
- [photo](#) of writing on a kitchen counter from 15. 12. 2015 (p. 95 of pdf, exh. 14)
- [analysis of the photos titled *Manipulation of Photo Metadata – Incident-12* by Andy has been streamed live by SEC, Stevie J Raw, Come Geek Some, and Doctor Soup then uploaded by SEC in several installments: [part 1](#) (*Amber Heard Photos, Manipulation and Cover ups?*, 23. 11. 2021), [part 2](#) (*Does Amber Heard Have Flawed Metadata?*, 24. 11. 2021), [part 3](#) (*The Examination of Amber Heard Photo Metadata*, 28. 11. 2021), [part 4](#) (*Amber Heard – Metadata Doesn't Lie*, 1. 12. 2021), [part 5](#) (*When Did Amber Heard Take Photos of Injuries?*, 3. 12. 2021), [part 6](#) (*Investigation Into Amber Heard "Hair Picture"*, 7. 12. 2021), [part 7](#) (*Amber Heard, Her "Evidence" Is Falling Apart*, 8. 12. 2021), [part 8](#) (*Did Amber Heard Use A Prop for Her Pictures*, 17. 12. 2021)]
- texts between AH and Jodi Gottlieb, her publicist, from 5. 11. 2015, 5:16, [15. 12. 2015](#), 23:52 (might not be fit for the show) and 16. 12. 2015, 1:21 (p. 97 of pdf, exh. 15)
- [texts1](#), [texts2](#), [texts3](#) between Ms. Pennington and AH regarding the headbutt incident from 20. – 21. 12. 2015, ? – 3:18 (p. 99 – 101 of pdf, exh. 16)
- p. 245 – 247 from CA [deposition](#) of Amber Heard regarding May 21 incident from 13. 8. 2016, Vol. II (p. 103 – 107 of pdf, exh. 17)
- p. 248 – 250 from CA [deposition](#) of Amber Heard regarding April 21 incident from 13. 8. 2016, Vol. II (p. 108 – 111 of pdf, exh. 18)
- p. 253 – 260 from CA [deposition](#) of Amber Heard regarding April 21 incident from 13. 8. 2016, Vol. II (p. 113 – 121 of pdf, exh. 19)
- cd disk (p. 122 – 123 of pdf, exh. 20)
- p. 302 – 307 from CA [deposition](#) of Amber Heard regarding May 21 incident from 13. 8. 2016, Vol. II (p. 125 – 130 of pdf, exh. 20)
- exh. 21, 22 and 23 are missing
- p. 312 – 316 from CA [deposition](#) of Amber Heard regarding May 21 incident from 13. 8. 2016, Vol. II (132 – 137 of pdf, exh. 24)
- cd disk (p. 139 of pdf, exh. 25)

- p. 342 – 343 from CA [deposition](#) of Amber Heard regarding May 21 incident from 13. 8. 2016, Vol. II (p. 140 – 142 of pdf, exh. 25)
- exhibits 26, 27 and 28 are missing
- six photos of alleged damage to PH3? from 21./22. 5. 2016 ([photo1](#) of the stairs, [photo2](#) of strewn papers, [photo3](#) of strewn papers, [photo4](#) of wine bottle on the floor, [photo5](#) of strewn jewelry, [photo6](#) unrecognizable) (p. 143–148 pdf, exh. 29)
- p. 356 – 357 from CA [deposition](#) of Amber Heard regarding May 21 incident from 13. 8. 2016, Vol. II (p. 150 – 152 of pdf, exh. 30)
- cd disk (p. 154 of pdf, exh. 31)
- texts between AH and Ms. Inglessis from 21. 5. 2016. 22:24 – Cops were called. They just left. Filing a restraining order. Divorce goes through on Monday. ... Cops came back. (p. 156 – 157 of pdf, exh. 32) [already decided about TRO. interesting timing about the first two officers just leaving then the second two arriving.]
- five photos of alleged damage to AH's face taken between 21. and 28. 5. 2016 ([photo1](#), [photo2](#), [photo3](#), [photo4](#), [photo5](#)) (p. 159 – 163 of pdf, exh. 33)
- [request for TRO](#) (p. 165 – 169 of pdf, exh. 34)
- CA [divorce/TRO declaration](#) of Amber Heard from 26. 5. 2016 (p. 171 – 174 of pdf, exh. 34)
- CA declaration of Raquel Pennington from 27. 5. 2016 (p. 176 – 179 of pdf, exh. 34)
- three photos of alleged damage to AH's face ([photo1](#), [photo2](#), [photo3](#)) (p. 181 – 183 of pdf, exh. 34)
- CA [declaration](#) & [dc2](#) of Samantha Spector from 27. 5. 2016 (p. 184 – 185 of pdf, exh. 34)
- [email](#) from Samantha Spector to Laura Wasser regarding ex parte notice from 26. 5. 2016, 9:52 (p. 187 of pdf, exh. 34)
- email with the [extortion letter](#) from 24. 5. 2016 (p. 190 – 191 of pdf, exh. 34)
- [notice](#) of court hearing about TRO and its approval from 27. 5. 2016 (p. 193 – 201 of pdf, exh. 35)
- article *Amber Heard's Ex-Girlfriend Tasya van Ree Speaks Out Following Domestic Abuse Allegations* by Lili Harrison for [E! News](#) from 8. 6. 2016, 21:57 (p. 203 – 208 of pdf, exh. 36)
- iO Tillett Wright's tweets and some responses from 6. 6. 2016 (p. 210 – 214 of pdf, exh. 37) [what cut head?]
- CA [declaration](#) of iO Tillett Wright from 13. 6. 2016 (p. 216 – 218 of pdf, exh. 38)
- article *Why I Called 911* by iO Tillett Wright for [Entertainment News](#) from 8. 6. 2016, 16:00 (p. 220 – 225 of pdf, exh. 38)
- CA [declaration](#) of iO Tillett Wright from 13. 6. 2016 (p. 226 of pdf, exh. 38)
- judgement of dissolution of marriage from 13. 1. 2017 (p. 228 – 282 of pdf, exh. 39)
- **10. 04. 2019 – Amber Heard's declaration** (AmHe 19-04-10 dc) is exhibit 7 (but without exhibits) which is part of exhibit JD1 of Joshua Drew's UK witness statement from 12. 2. 2020, p. E346 – E379 ([JoDr 20-02-12 w](#)) ✓
 - the text is the same as above, but exhibits are different
 - texts between Joshua and AH on 12. 3. 2015 (p. E361)

- texts between Joshua and AH on 31. 1. 2015 incl. photo of knives (p. E362 – E364)
- [photo](#) of writing in gold pen on a kitchen counter (p. E366)
- reddish [photo](#) of AH in a white shirt in a bathroom with alleged bruise below the R eye but towards the nose (p. E368)
- another [photo](#) of AH similar to the above (p. E369)
- another dark reddish [photo](#) of AH in a white shirt in a bathroom with alleged bruise below the R eye towards the nose (p. E370)
- another [photo](#) of AH similar to the above (p. E371)
- another [photo](#) of AH similar to the above (p. E372)
- another [photo](#) of AH similar to the above (p. E373)
- [photo](#) of AH's L cheek in a yellow sweater (p. E374)
- same [photo](#) as on p. E372 (p. E75)
- [photo](#) of AH in a kitchen (p. E376)
- [photo](#) of AH in a white shirt with what alleged bruising around the R eye and conglutating blood clot attached to her lower lip (p. E377)
- [photo](#) of AH in a white shirt with alleged blood clot on her lip (p. E378)
- [photo](#) of maybe AH's scalp (p. E379)
- **11. 04. 2019 – cover letter for AH's motion to admit pro hac vice** ([pdf](#))
- **11. 04. 2019 – AH's motion to admit pro hac vice** ([pdf](#))
- **11. 04. 2019 – George application to appear pro hac vice** ([pdf](#))
- **11. 04. 2019 – Schwartz application to appear pro hac vice** ([pdf](#))
- **11. 04. 2019 – AH's motion to dismiss pursuant to VA. code § 8.01-265(i) and plea in bar** ([AH-PleaBar](#)) ✓
 - **AH's 1st attempt to dismiss**
- **11. 04. 2019 – AH's motion for leave for briefing schedule and evidentiary hearing on motion to dismiss pursuant to VA. code § 8.01-265(i)** ([brief-sched](#), [pdf2](#)) ✓
 - proposed order (p. 5 – 7 of pdf)
 - AH's memorandum in support of motion to dismiss from 11. 4. (p. 9 – 23 of pdf, exh. A)
 - VA declaration of Amber Heard, with exhibits, from 10. 4. 2019 (p. 24 – 282 of pdf)
- **11. 04. 2019 – AH's memorandum in support of her motion to dismiss** is exhibit A in her motion for leave for briefing schedule and evidentiary hearing from 11. 4. 2019, p. 9 – 23 of pdf ([brief-sched](#)) ✓
 - The vast majority of these violent incidents occurred when Mr. Depp was drunk or high or both in their Los Angeles, California home... [well, if we count the 14 incidents (which are supposed to be the worst or they wouldn't be in the court documents, right?), only 6 of them happened in the ECB in LA (1, 6, 10, 12, 13, and 14), so that is not even half of them, and far from the vast majority]
 - After the insuing media frenzy – in which Mr. Depp distorted the truth for public consumption – Ms. Heard resolved to fight for the victims of domestic violence... (p. 1; p. 9 of pdf) [huh, huh, deep breaths, deep breaths]

- [Mr. Depp] now claims ... that he has dozens of witnesses (notably, all of whom are located in Los Angeles, California)... [Tara Roberts is from the Bahamas, Ben King from London.]
- 12. 04. 2019 – consent order admitting pro hac vice counsel for AH ([pdf](#)) ✓
- 16. 04. 2019 – letter from reporter ([pdf](#))
- 24. 04. 2019 – notice of scheduling conference ([pdf](#))
- 27. 04. 2019 – AH's motion to dismiss (transfer venue) and plea in bar
- 30. 04. 2019 – order for briefing schedule on motion to dismiss ([pdf](#)) ✓
- 04. 2019 – Samantha McMillen's declaration (SaMcM 19-04-?? dc) is exhibit 1-R in JD's opposition to motion to dismiss from 20. 5. 2020, p. 318 – 319 ([JD-OppDismiss](#)) ✓
 - 6. I was also aware that Mr. Depp left Los Angeles on May 22, 2016. So I knew Mr. Depp could not have caused those marks that Amber Heard appeared with in court on May 27, 2016. [in the court hearing on 14. 7. 2020, p. 996, Ms. McMillen corrected the first date to May 23, 2016. which is correct because JD appeared on Jimmy Kimmel and Alice Through the Looking Glass Hollywood premiere on 23. 5.]
- 03. 05. 2019 – returned notice for scheduling conference ([pdf](#))
- 07. 05. 2019 – cover letter for JD's motion to admit pro hac vice ([pdf](#))
- 07. 05. 2019 – JD's motion to admit pro hac vice counsel ([pdf](#))
- 07. 05. 2019 – Wingarten application to appear pro hac vice ([pdf](#))
- 07. 05. 2019 – subpoena duces tecum for Kevin Murphy ([pdf](#))
 - declaration of Amber Heard from 10. 4. 2019 (p. 13 – 28 of pdf, att. B)
- 08. 05. 2019 – second cover letter for JD's motion to admit pro hac vice ([pdf](#))
- 10. 05. 2019 – consent order admitting pro hac vice counsel for JD ([pdf](#)) ✓
- 13. 05. 2019 – Kevin Murphy's declaration (KeMu 19-05-13 dc) is exhibit 2 in JD's opposition to dismiss from 20. 5. 2020, p. 323 – 329 of pdf ([JD-OppDismiss](#)) ✓
 - is very similar to his UK witness statement from 12. 12. 2019
 - 2. employed by JD as an estate manager for nearly eight years, but ceased working for him in 2016
 - 4. I witnessed first hand Amber's commission of both violence and verbal abuse of Johnny on multiple occasions. I never once witnessed Johnny abuse Amber in any way, whether physical or verbal. I never saw Johnny raise his voice towards anyone during my entire tenure. [eight years!]
 - 5. and 6. deal with dogs smuggling: On Oct 11 and 12, 2015, Amber asked me to call a witness, her former assistant Kate James, and ask her on Amber's behalf to lie under oath to an Australian court that was criminally prosecuting Amber. ... Amber was aware it was illegal, ... Shortly after ... Amber demanded that I myself make a fraudulent, false witness statement ... I expressed that I was extremely uncomfortable, but was met with the threatening statement from Amber "Well I want your help on this ... I wouldn't want you to have a problem with your job." ... I also again reminded her that the requirements were much stringent and the penalties much more severe than the Bahamas as she had smuggled the dogs in to the Bahamas on a prior occasion without any paperwork.

- 7. ... I was informed by Johnny in person that Amber ... just two minutes before I arrived ... became enraged and threw a heavy television remote control so hard into Johnny's forehead that the remote control broke and left the round, swelling lump with a laceration on his forehead that I could clearly see. [do we know when was this? are there any pictures or footage of JD?]
 - 9. I went over to Johnny's penthouse at Amber's request the day after she alleged this assault occurred, on December 16, 2015. ... I went upstairs [to the master bedroom and met Amber.] ... About an hour or so following this discussion Amber said that she wanted to "show me something in the bedroom of the adjoining penthouse" (PH4). ... She pointed to the carpeting where there was a tuft of hair. ... I immediately took a picture of the hair with my phone.
 - 10. Johnny's security detail Sean Bett ... told me the next day [22. 4. 2016] that Amber had in fact become enraged by Johnny arriving late from a business meeting to her birthday dinner, and punched him repeatedly in the face as he lay reading in bed, forcing Mr. Bett to request a pick up and ride back to his West Hollywood house.
 - 11. On April 22, 2016, ... Hilda Vargas, Johnny's housekeeper ... told me that she had discovered feces in Amber and Johnny's bed ... on top of the bed sheet on Johnny's side of the bed.
 - 13. On May 12, 2016, I received a text and then a telephone call from Amber. ... she sounded very angry. ... She also told me that leaving the feces in Johnny's bed had been "just a harmless prank".
 - 14. On May 21, 2016 at approximately 7:46 p.m., I received a telephone call from both Johnny and Amber who were on speakerphone together. ... Then I heard Johnny say that he couldn't do this anymore and wanted a divorce. When Amber would not stop screaming, I hung up the telephone.
 - 15. Between 8 and 8.15 p.m. that evening, I received a text from Sean Bett indicating that Johnny alone was going to call me shortly from Sean's telephone. ... He seemed tired and pretty sad, not angry.
 - [emails](#) between AH's attorney Marty Singer, AH and Mr. Murphy regarding dogs' smuggling trial from 9. and 11. 10. 2015, 7:29 (p. 331 – 333 of pdf, exh. A)
 - email from AH to Karl Martin from 9. 10. 2015, 15:28 regarding dogs (p. 331 of pdf, exh. A)
 - [email1](#) and [email2](#) from AH to Kevin Murphy from 11. 10. 2015 regarding getting Kate James to lie about the dogs (p. 332 – 333 of pdf, exh. A)
 - combined [photos](#) of a clump of hair taken by Mr. Murphy and of a different clump of hair with a pointing finger taken by AH (p. 335 of pdf, exh. B)
 - screenshot of a text from AH to Mr. Murphy asking for a call from 12. 5. 2016, 10:39 (p. 337 of pdf, exh. C)
 - screenshot of a text from Mr. Bett to Mr. Murphy from 21. 5. 2016, 22:00, is JD at Sweetzer? (p. 339 of pdf, exh. D)
- ?? 05. 2019 – Johnny Depp's declaration ([JoDe 19-05-?? dc](#)) is also exhibit 1, with exhibits!, in his opposition to AH's motion to dismiss from 20. 5. 2019, p. 19 – 40 / 321

of pdf ([JD-OppDismiss](#), [pdf2](#)), and exhibit 19, but without exhibits, in Joshua Drew's UK witness statement from 12. 2. 2020, p. E414 – E426i ([JoDr 20-02-12 w](#)) ✓

- 2. I have denied Ms. Heard's allegations vehemently since she first made them in May 2016, when she walked into court to obtain a temporary restraining order with painted-on bruises that witnesses and surveillance footage show she did not possess each day of the preceeding week. ... I never abused Ms. Heard or any other woman.
- 3. I am bringing this lawsuit not only to clear my name and restore my reputation, but to attempt to bring clarity to the women and men whose lives have been harmed by abuse and who have been repeatedly lied to by Ms. Heard purporting to be their spokesperson.
- p. 5 – 7, 348, 353, 369 – 377, 382 – 395 from CA [deposition](#) of Amber Heard from 13. 8. 2016 (p. 42 – 73 of pdf)
- black photo of sth (p. 75 of pdf)
- three black screenshots of texts with photos from 14:40 and 14:46 (p. 77 – 79 of pdf)
- b/w photo of the severed finger (p. 81 of pdf)
- p. 4 – 5, 57 – 58 from CA deposition of Raquel Pennington from 16. 6. 2016 (p. 83 – 96 of pdf)
- p. 353 from CA [deposition](#) of Amber Heard (p. 99 of pdf)
- CA [deposition](#) of Elizabeth Marz from 15. 7. 2016 (p. 101 – 106 of pdf)
- CA [deposition](#) of officer Melissa Saenz from 18. 7. 2016 (p. 108 – 155 of pdf)
- CA [deposition](#) of officer Tyler Hadden from 18. 7. 2016 (p. 157 – 177 of pdf)
- [text1](#), [text2](#), [text3](#), [text4](#) from AH to JD on 25. 5. 2016, 4:33/16:33 regarding a private letter and why she filed for TRO (p. 179 – 183 of pdf)
- CA declaration of Isaac Baruch **from 6. 2016 or 21. 1. 2019?** (p. 185 – 190 of pdf)
- CA deposition of Trinity Esparza from 25. 1. 2019 (p. 193 – 242 of pdf)
- CA [deposition](#) of Cornelius Harrell from 31. 1. 2019 (p. 243 – 271 of pdf)
- CA deposition of Alejandro Romero from 30. 1. 2019 (p. 272 – 304 of pdf)
- UK [declaration](#) of Brandon Patterson from 1. 2019 (p. 306 – 313 of pdf)
- b/w [still](#) of AH on cctv from 24. 5. 2016, 23:18 (p. 315 of pdf) [similar [still](#)]
- b/w [still](#) of AH on cctv from 24. 5. 2016, 21:17 (p. 315 of pdf)
- b/w still of AH on cctv from 25. 5. 2016, 19:19 (p. 316 of pdf) [similar [still](#)]
- VA declaration of Samantha McMillen from 4. 2019 (p. 318 – 319)
- [letter](#) from AH to the Department of Homeland Security regarding Savannah McMillan being her friend and not an employee without a green card from 20. 9. 2014, very bad quality (p. 321 of pdf)
- VA declaration of Kevin Murphy, w/ exhibits, from 13. 5. 2019 (p. 323 – 339 of pdf)
- **20. 05. 2019 – JD's opposition to AH's motion to dismiss** ([JD-OppDismiss](#), [pdf2](#)) ✓
 - I. Ms. Heard's Declaration, like her published op-ed, is false and defamatory, the product of a serial fabulist intent on furthering her career with her hoax, and harming Mr. Depp's reputation and livelihood.
 - IIIA. Plaintiff's causes of action arose in Virginia, which is fatal to Ms. Heard's motion to dismiss.

- IIIB. Ms. Heard cannot overcome Mr. Depp's "presumption of correctness" regarding his choice of forum.
- IIIC. Ms. Heard is not entitled to an evidentiary hearing.
- VA [declaration](#) of Johnny Depp, with exhibits, from 5. 2019 (p. 19 – 321 pdf, exh. 1)
- VA declaration of Kevin Murphy, with exhibits, from 13. 5. 2019 (p. 323 – 339 of pdf, exh. 2)
- 20. 05. 2019 – JD's motion to admit pro hac vice counsel ([pdf](#))
- 20. 05. 2019 – Vazquez application to appear pro hac vice ([pdf](#))
- 20. 05. 2019 – JD's cover letter for subpoena duces tecum ([pdf](#))
- 21. 05. 2019 – consent order admitting pro hac vice counsel for JD ([pdf](#)) ✓
- 24. 05. 2019 – JD's motion to admit pro hac vice counsel ([pdf](#))
- 24. 05. 2019 – Attridge application to appear pro hac vice ([pdf](#))
- 24. 05. 2019 – JD's motion to admit pro hac vice counsel ([pdf](#))
- 24. 05. 2019 – Gilmore application to appear pro hac vice ([pdf](#))
- 29. 05. 2019 – consent order admitting pro hac vice counsel for JD ([pdf](#)) ✓
- 29. 05. 2019 – consent order admitting pro hac vice counsel for JD ([pdf](#)) ✓
- 31. 05. 2019 – AH's reply in support of motion to dismiss / transfer praecipe ([pdf](#))
- 31. 05. 2019 – AH's reply in support of motion to dismiss/transfer ([AH-ReplSuppMotDismiss](#)) ✓
 - ...Mr. Depp has clearly perjured himself by claiming that there was only one 911 call reporting his abuse on the evening of May 21, 2016. Readily obtainable public records of LAPD call logs from that evening show that iO Tillet Wright called 911 at 8:30 p.m.... of how iO heard that Mr. Depp was becoming violent towards Ms. Heard over the phone and then called 911. (p. 1, note 1) [Mr. Wright did not call LAPD. he called NYPD and that was logged at 20:16 – 20:23 CA time (which would be 23:16 – 23:23 NY time), according to p. 127 of pdf in NGN's closing submissions (which do not provide the actual incident recall; [NGN-cl](#)). but! Mr. Wright's phone records show that he called 911 on 22. 5. 2016 at 3:16am NY time or 00:16 CA time (the call lasted 7mins). there is a 3h difference between NY and CA. NGN's defense recalculated only the 911 call with a 6h time difference, all other calls to California were recalculated with a 3h time difference. then a friend of his (the identity is disputed, Mr. Wright claims this was Lauren Shapiro who says in the call she is downstairs (of the Eastern?) but in fact happened to attend the Cinespia 2016 party movie night at Hollywood Forever Cemetery where the screening of *The Silence of the Lambs* started at 20:30. she posted an [IG](#) from there, and a [tweet](#) and a [tweet](#) were posted by her friends.) in Los Angeles called LAPD at 20:27 and that was logged at 20:30. the duplicate call from NYPD to LAPD came through at 20:37. the teletype from NYPD to LAPD came through almost two hours later and was logged at 22:09. so. no one called 911 at 20:30, and especially not Mr. Wright.]
 - LAPD [incident recall](#) LPD160521005437 from 21./22. 5. 2016 (p. 9 of pdf)
 - LAPD [incident recall](#) LPD160521004756 from 21. 5. 2016 (p. 10 of pdf)
- 13. 06. 2016 – JD submits four cases by praecipe ([pdf](#)) ✓

- case law from Blue Ridge Bank vs. Veribanc (p. 4 – 13 of pdf)
- case law from Guy Sponaugle vs. Grace Rutledge (p. 14 – 16 of pdf)
- case law from William Moore vs. Allied Chemical Corporation (p. 17 – 30 of pdf)
- case law from Wesley James Weaver vs. Beneficial Finance Co. (p. 31 – 37 of pdf)
- **27. 06. 2019 – scheduling order** ([pdf](#)) is also exhibit C in AH's memorandum in support of her motion to strike JD's expert disclosures and for bifurcation, p. 70 – 72 of pdf ([AH-MemoStrikeExpert](#)) ✓
- **28. 06. 2019 – Laura Divenere's declaration** ([LaDi 19-06-28 dc](#)); [listen](#) to it on Stevie J Raw's youtube channel (27. 4. 2021) ✓
 - 2. I worked for Johnny Depp and Amber Heard as their interior decorator in downtown LA in the Eastern Columbia Building from July 2014 to sometime in 2016. ... I also at times lived in the ECB.
 - 5. I was with Amber and interacted with her frequently on the several days immediately following her abuse allegations of May 21, 2016, including at least on May 23, 25, and 25. ... I rode elevators with her...
 - 6. I knew and interacted with Amber's close friends Rocky Pennington, iO Tillet Wright, and her sister Whitney Heard. None of them ever mentioned any accusation of violence or other abuse against Amber by Mr. Depp.
 - 8. I witnessed Amber being verbally abusive towards her former assistant Kate, screaming at her on the phone.
 - 10. When Ms. Heard was preparing to move out of the penthouse, I witnessed pink post-it notes covering much of this furniture that I had acquired for Mr. Depp, which was paid for by Mr. Depp, stating that his furniture was Amber's property Amber did take this furniture. [so AH essentially stole the furniture from JD]
 - [Mr. Sherman, Ms. Divenere's attorney's, [email](#) confirming the declaration is truthful and accurate, from 10. 3. 2020]
- **28. 06. 2019 – hearing for AH's motion to dismiss** ([AH-MotDismiss](#), [pdf2](#)) ✓
- **?? 06. 2019 – Starling Jenkins' draft declaration** ([StJe 19-06-?? dc](#)) ✓
 - 2. I have worked for Johnny Depp personally since 1993...
 - 3. [21. 4. 2016 Birthday] **My shift ended around 11:00 PM, as Amber's friends were leaving. When I left the residence, Johnny had not yet arrived.**
 - 4. I returned to the residence the following day, Friday, April 22, 2016... When I entered the residence, Amber explained to me that she had thrown Johnny's cell phone – and the wallet containing it – off the balcony the night before, and that she was using the "Find My iPhone" application on another cell phone to locate Johnny's phone. [here we have more evidence that JD has his phone in a booklet-like thing as Mr. Drew testified. AH's [texts](#) to Mr. Jenkins from 22. 4. 2016, 8:37 when she was trying to locate JD's phone.]
 - 6. These friends were Raquel Pennington, Amber's sister Whitney, Amber's assistant Savannah, and Amber's make-up artist. ... iO Tillet drove separately. ... I did take one photo of Amber's group on Friday night at Coachella...
 - 7. I last heard from Amber on Thursday, May 12.
 - group [photo](#) in Coachella (exh. A) not in pdf
 - text from AH to Mr. Jenkins asking if she can call (exh. B) not in pdf

- **09. 07. 2019 – JD's 1st RFPs** are extracted from email sent to Mr. Rottenborn on 14. 11. 2019 which is exhibit C in JD's memorandum in support of motion to compel AH to provide HIPAA releases from 12. 6. 2020, p. 25 – 27 of pdf ([JD-MemoHIPAA](#)) ✓
 - 1. – 12. + 15. all related to incidents
 - 16. all related to incident with Tasya van Ree in 2009
 - 17. all related to allegations not covered above
 - 28. all related to Elon Musk visiting the Eastern
 - 29. all related to Op-Ed
 - 30. all related to par. 54 of AH's VA declaration
- **25. 07. 2019 – judge White's 1st opinion letter** ([White-OpLetter1](#)) ✓
- **30. 07. 2019 – AH's 1st RFPs** are exhibit A of her memorandum for JD to produce documents and release medical records, p. 13 – 27 pdf ([AH-MemoJDsDocs+Medical](#)) ✓
 - 1. all from Mar 2016 related to declaration, affidavit or statement regarding AH
 - 2. all related to marriage from 2016 to present
 - 3. all related to employees regarding any violence
 - 4. all related to employees regarding narcotics from 2013 to present
 - 5. all related to alcohol or drug use from 2013 to present
 - 6. all related to employees regarding travel between 20 and 26 May 2014
 - 7. all related to employees regarding Australia from Mar 2015
 - 8. all non-privileged relating to JD / AH relationship 15. 5. – 30. 6. 2016
 - 9. all related to op-ed
 - 10. all related to JD's damaged career and reputation
 - 11. all related to termination of Jack Sparrow
 - 12. all related to other lost or rescinded acting roles
 - 13. all security video footage from the Eastern from 2013 to 2016
 - 14. surveillance video relating to the fake punch
 - 15. any security or surveillance video from the Sweetzer from 2013 to 2016
 - 16. all between JD and ECD personnel from 2013 to 2016
 - 17. docs related to payments to JD's security from 2012 to present
 - 18. docs related to payments to Samantha McMillen from 2015 to present
 - 19. docs related to payments to any social media from 2015 to present
 - 20. docs related to payments to the press from 2015 to present
 - 21. docs related to payments to Bahamas personnel from 2014 to 2016 + 2019
 - 22. all newly obtained surveillance videos, depositions, and other evidence
 - 23. all related to the Seattle charges
 - 24. all related to AH's abuse
 - 25. all related to Mr. Musk visiting AH
 - 26. all related to Isaac Baruch from 22. – 27. 5. 2016
 - 27. – 29. all related to Cornelius Harrell's, Alejandro Romero's and Trinity Esparza's statements
 - 30. – 39. all between JD and various people (Chrissy Depp, Nathan Holmes, Stephen Deuters, Christy Dembrowski, Kevin Murphy, Jerry Judge, Sean Bett,

Malcolm Connolly, dr. Kipper, Debbi Lloyd) related to JD's romantic partners 2010 to Apr 2019

- 40. all payments for hotels, rental houses, apartments, etc. related to damage
 - 41. docs related to JD's arrests and reasons for them
 - 42. all written agreements between JD and romantic partners
 - 43. all relating to three surgeries to reconstruct JD's finger
 - 44. all relating to emergency treatment in Australia
 - 45. all relating to travel on 22 May 2016
 - 46. all related to trying to make Kate James perjure herself
 - 47. all related to Savannah McMillan being AH's assistant
 - 48. all docs obtained via subpoena for this litigation
-
- **07. 08. 2019 – Elizabeth Marz's drafts of her declaration** (ElMa 19-08-07 dc)
 - **08. 08. 2019 – order denying AH's motion to dismiss** ([pdf](#), [pdf](#)) ✓
 - **08. 08. 2019 – affidavit of service for Samantha McMillen** ([pdf](#))
 - **13. 08. 2019 – AH's motion for entry of protective order** ([pdf](#))
 - **16. 08. 2019 – agreed order regarding discovery** ([pdf](#))
 - **19. 08. 2019 – foreign subpoena for James Franco** ([pdf](#))
 - **21. 08. 2019 – certificate of counsel** ([pdf](#))
 - **22. 08. 2019 – foreign subpoena for Joshua Drew** ([pdf](#))
 - **22. 08. 2019 – foreign subpoena for Jodi Gottlieb** ([pdf](#))
 - **22. 08. 2019 – foreign subpoena for Melanie Inglessis** ([pdf](#))
 - **22. 08. 2019 – foreign subpoena for Elizabeth Marz** ([pdf](#))
 - **22. 08. 2019 – foreign subpoena for Raquel Pennington** ([pdf](#))
 - **27. 08. 2019 – foreign subpoena for Elizabeth Marz** ([pdf](#))
 - **27. 08. 2019 – foreign subpoena for Raquel Pennington** ([pdf](#))
 - **28. 08. 2019 – foreign subpoena for Raquel Pennington** (pdf) is on p. 3 – 14 of pdf in certificate of counsel Benjamin Chew from 6. 9. 2019 ([pdf](#))
 - **30. 08. 2019 – Kristina Sexton's deposition** (KrSe 19-08-30 dp)
 - **30. 08. 2019 – AH's Friday motions day practice** ([pdf](#))
 - **30. 08. 2019 – Sean Patrick Roche's declaration** (SeRo 19-08-30 dc) is on p. 9 – 11 of pdf of AH's memorandum in support of motion for protective order from 20. 8. 2019 ([AH-MemoProtectOrder](#)) ✓
 - 12. ...at 2:58pm ET on August 21, 2019, Mr. Depp's counsel indicated by e-mail that: "Mr. Depp has decided to oppose Defendant's motion for entry of a protective order. ... Ms. Heard chose to publish her op-ed in the *Washington Post* last December, defaming Mr. Depp, and then attached to the papers in support of her motion to dismiss (transfer venue) a declaration attaching materials unrelated to the merits of her motion."
 - **30. 08. 2019 – AH's memorandum in support of motion for protective order** ([AH-MemoProtectOrder](#)) ✓

- reference to article *Johnny Depp Was Allegedly Hit in the Face With a Paint Can Thrown By Amber Heard* by Daniel Goldblatt for [The Blast](#) from 29. 6. 2019, 13:47 (p. 4)
- reference to article *Amber Heard's 'Friend' Goes on the Record: 'I Never Saw Amber Injured in Any Way' at the Hands of Johnny Depp* by Mike Walters for [The Blast](#) from 15. 7. 2019, 17:06 (p. 4)
- declaration of Sean Patrick Roche from 30. 8. 2019 (p. 9 – 11 of pdf)
- proposed protective order (p. 12 – 25 of pdf)
- confidentiality agreement attached to the protective order (p. 28 – 29 of pdf)
- **03. 09. 2019 – JD's responses and objections to AH's 1st RFPs** are exhibit B in AH's memorandum for JD to produce documents and release medical records from 27. 9. 2019, p. 29 – 69 of pdf ([AH-MemoJDsDocs+Medical, pdf2](#)) ✓
- **03. 09. 2019 – application to appear pro hac vice for Julie Fink** ([pdf](#))
- **03. 09. 2019 – application to appear as pro hac vice for Roberta Kaplan** ([pdf](#))
- **03. 09. 2019 – application to appear pro hac vice for John Quinn** ([pdf](#))
- **04. 09. 2019 – Robert Gilmore's witness statement** (RoGi 19-09-04 w)
- **04. 09. 2019 – Amber Heard's declaration** ([AmHe 19-09-04 dc](#)) is also on p. 34 – 35 of pdf in her motion for leave to file amended responsive pleading from 5. 9. 2019 ([AH-MotAmendedPleading](#)) ✓
 - 2. In early November 2018, I began to get more actively involved with the American Civil Liberties Union. [that's kinda weird. wasn't she named their ambassador right after the DPM, in august 2016?] I had made a donation to the ACLU [which is not actually true, JD made a donation on her behalf, she threw a tantrum and wanted more money], and wanted to use my position to advocate for social justice, civil liberties, and other political issues.
 - 6. On December 14, 2018, Jessica [Weitz] informed me that the Washington Post had agreed to publish the Op-Ed.
- **04. 09. 2019 – application to appear as pro hac vice for Joshua Matz** ([pdf](#))
- **05. 09. 2019 – notice of appearance for Benjamin Rottenborn** ([pdf](#))
- **05. 09. 2019 – notice of appearance for Joshua Treece** ([pdf](#))
- **05. 09. 2019 – motion to admit pro hac vice Roberta Kaplan as co-counsel for AH** ([pdf](#))
- **05. 09. 2019 – motion to admit pro hac vice Joshua Matz as co-counsel for AH** ([pdf](#))
- **05. 09. 2019 – motion to admit pro hac vice Julie Fink as co-counsel for AH** ([pdf](#))
- **05. 09. 2019 – motion to admit pro hac vice John Quinn as co-counsel for AH** ([pdf](#))
- **05. 09. 2019 – AH's demurrer and plea in bar** are on p. 8 – 9 of pdf in her motion for leave to file amended responsive pleading from 5. 9. 2019 ([AH-MotAmendedPleading](#)) ✓
 - **2nd attempt to dismiss**
 - I. Demurrer – Mr. Depp's defamation claim fails as a matter of law because none of the allegedly defamatory statements identified in the Complaint are actionable. Three of them are statements of opinion and all four of them lack any defamatory implication.

- II. Plea in Bar – There are three discrete reasons why the Complaint should be dismissed in part or in full. *First*, as she confirms by affidavit, Ms. Heard neither wrote nor selected the title for the online edition of her op-ed, and thus cannot be held liable for that alleged defamatory statement. *Second*, the Complaint seeks ultimately to impose liability on Ms. Heard for statements that she made in 2016, but that is precluded by the applicable statute of limitations. [one year] *Finally*, Ms. Heard is entitled to statutory immunity from defamation liability under Virginia Code Section 8.01-223.2, the Virginia anti-SLAPP statute, and should be awarded her reasonable attorney fees and costs pursuant to that same provision.
- **05. 09. 2019 – AH's memorandum in support of demurrer and plea in bar** ([AH-MemoDemurPleaBar](#)) ✓
 - Ms. Heard did not actually write the first allegedly defamatory statement (the title of the op-ed); and the first, second, and third statements are protected opinions. (p. 16 of pdf)
 - Ms. Heard draw on a lifetime of experience to support this call to action. (p. 18 pdf)
 - In Mr. Depp's view, however, Ms. Heard can never speak about the backlash she endured after reporting him, or about the death threats leveled against her, without impliedly re-accusing him of abuse. (p. 24 of pdf)
- **05. 09. 2019 – AH's motion for leave to file amended responsive pleading** ([AH-MotAmendedPleading](#)) ✓
 - 17. Ms. Heard's current Plea in Bar asserts immunity under Virginia's Anti-SLAPP statute.
 - demurrer and plea in bar from 5. 9. 2019 (p. 8 – 9 of pdf)
 - [memorandum](#) in support of demurrer and plea in bar seeking dismissal of all claims from 5. 9. 2019 (p. 12 – 32 of pdf)
 - [declaration](#) of Amber Heard from 4. 9. 2019 (p. 34 – 35 of pdf)
- **06. 09. 2019 – reponse to motion for protective order** ([pdf](#))
- **06. 09. 2019 – JD's opposition to AH's motion for protective order** ([JD-OppProtectOrder](#), [pdf2](#)) ✓
 - Only the truth can restore the incalculable damage that Ms. Heard has inflicted on Mr. Depp. (p. 1)
 - The confidentiality clauses in the parties' divorce degree *explicitly* barred Ms. Heard, Mr. Depp, and their respective agents and attorneys from disclosing *any* information about their marriage, a **prohibition Ms. Heard has repeatedly violated since November 2016**, falsely accusing Mr. Depp of abuse in an apparent effort to promote her acting career and masquerade as an "abuse survivor" while damaging the reputation of her former husband. (p. 4)
 - **In this context, it would be unfair to allow Ms. Heard, having used publicity of her hoax as a sword against Mr. Depp for years to destroy his reputation while burnishing hers, to now use a protective order as a shield against disclosures of materials which will undo all the damage her false publicity has done.** (p. 4)
 - article *Amber Heard Has Filed New Allegations That Johnny Depp Abused Her During Drug-Fueled Rages* by Amber Jamieson for [BuzzFeedNews](#) from 12. 4. 2019, 17:40 ET (p. 7 – 18 of pdf, exh. A)

- article *Cause Celeb: Amber Heard backs 'revenge' porn' bill on Capitol Hill* by Emily Heil for the [Washington Post](#) from 22. 5. 2019 (p. 19 – 20 of pdf, exh. B)
- **06. 09. 2019 – JD's opposition to AH's motion for protective order filed in chambers ([JD-OppProtectOrder](#))** ✓
 - ...it would be grossly unfair to allow Ms. Heard – who has already disseminated to the media and the public as much defamatory material about her former husband as she could concoct – to now ide the objective facts that reveal her falsehoods behind an artificial wall of confidentiality. (p. 1)
 - article *Amber Heard Has Filed New Allegations That Johnny Depp Abused Her During Drug-Fueled Rages* by Amber Jamieson for [BuzzFeedNews](#) from 12. 4. 2019, 17:40 ET (p. 8 – 19 of pdf)
 - article *Cause Celeb: Amber Heard backs 'revenge' porn' bill on Capitol Hill* by Emily Heil for the [Washington Post](#) from 22. 5. 2019 (p. 20 – 21 of pdf)
 - opinion letter and order from litigation Julie Jarrell vs. Kroger Ltd Partnership from 17. 7. 2014 (p. 23 – 27 of pdf)
 - opinion letter from litigation World Mission Society Church of God vs. Michelle Colon from 20. 7. 2012 (p. 27 – 31 of pdf)
 - memorandum opinion in litigation USA vs. Erik Prince from 5. 11. 2010 (p. 32 – 37 of pdf)
 - opinion letter in litigation Sue Carol Perreault vs. The Free Lance-Star from 12. 9. 2008 (p. 38 – 46 of pdf)
 - letters to clerk and judge White from 10. 9. 2019 (p. 47 – 48 of pdf)
 - protective order in litigation JD vs. Bloom Hergott... from 21. 3. 2018 (p. 51 – of pdf)
- **06. 09. 2019 – certificate of counsel for Benjamin Chew ([pdf](#))**
 - deposition subpoena for Raquel Pennington from 28. 8. 2019 (p. 3 – 14 of pdf)
 - [subpoena](#) duces tecum for Raquel Pennington from 27. 8. 2019 (p. 33 – 47 pdf)
- **09. 09. 2019 – application to appear pro hac vice for Adam Waldman ([pdf](#))**
- **10. 09. 2019 – motion to admit pro hac vice Adam Waldman as co-counsel for JD ([pdf](#))**
- **10. 09. 2019 – AH's letter to judge White asking for protective order ([pdf](#))** ✓
 - protective order in litigation JD vs. Bloom Hergott... from 21. 3. 2018 (p. 5 – 17 of pdf)
 - stipulation and protective order in litigation JD vs. Bloom Hergott... from 30. 6. 2017 (p. 20 – 31 of pdf)
 - revisited stipulation and protective order in litigation JD vs. Bloom Hergott... from 8. 8. 2017 (p. 34 – 47 of pdf)
 - stipulated protective order in litigation Jane Doe vs. JD from 6. 6. 2012 (p. 51 – 62 of pdf)
 - declaration and non-disclosure agreement in litigation Jane Doe vs. JD, undated (p. 65 – 66 of pdf)
- **11. 09. 2019 – meet & confer**
- **11. 09. 2020 – subpoena for Twitter** is on p. 38 – 86 of pdf in AH's memorandum in opposition to JD's motion to quash and for a protective order from 4. 1. 2021 ([AH-MemoQuashProtectOrder](#)) ✓

- and Adam Waldman's IP addresses, incl. 200+ account screen names
- **12. 09. 2019 – consent order for Adam Waldman to appear pro hac vice for JD** ([pdf](#))
- **12. 09. 2019 – letter to supreme court of Virginia** ([pdf](#))
- **12. 09. 2019 – AH's motion to compel** ([pdf](#))
- **12. 09. 2019 – AH's memorandum in support of motion to compel JD to produce documents** ([AH-MemoMotCompel1](#)) ✓
 - Not only was Dr. Kipper responsible for treating Mr. Depp's substance abuse, but he also witnessed and/or learned about injuries that Ms. Heard suffered at Mr. Depp's hand. (p. 4) [*dr. Kipper did not actually witness any violence, he was only told of it or could/did see the results or lack thereof*]
 - reference to article *Depp stuck* by William Trott for [United Press International](#) from 10. 3. 1989
 - reference to article *UK Depp arrested after scuffle* for [BBC News](#) from 31. 1. 1999, 13:11 GMT
 - reference to article *Love and Depp* by Shelley Levitt for [People](#) from 3. 10. 1994
 - reference to article *Keeping His Head* by Kyle Smith for [People](#) from 13. 12. 1999, 12:00
 - AH's 1st RFPs from 30. 7. 2019 (p. 9 – 23 of pdf, exh. A)
 - JD's responses and objections to AH's 1st RFPs from 3. 9. 2019 (p. 26 – 65 of pdf, exh. B)
 - letter from Mr. Treece to Mr. Chew regarding JD's responses and objections from after 3. 9. 2019 (p. 67 of pdf, exh. C)
- **13. 09. 2019 – hearing's** p. 21 – 24, 33 – 38 are on p. 65 – 69 of pdf in JD's reply memorandum in opposition to motion for sanctions against Adam Waldman from 16. 10. 2020 ([JD-OppAdamWald](#)) ✓
 - regarding protective order
- **13. 09. 2019 – order denying AH's motion for protective order** ([pdf](#))
- **19. 09. 2019 – meet & confer**
- **20. 09. 2019 – AH's letter summarizing discovery status and scheduling matters** is exhibit C in her memorandum for JD to produce documents and release medical records from 27. 9. 2019, p. 70 – 77 of pdf ([AH-MemoJDsDocs+Medical](#), [pdf2](#)) ✓
- **23. 09. 2019 – AH's motion for leave to file amended responsive pleading praecipe** ([pdf](#))
- **24. 09. 2019 – AH's motion to compel praecipe** ([pdf](#))
- **25. 09. 2019 – protective order regarding confidential information** ([pdf](#)) is also on p. 49 – 65 of pdf of JD's memorandum in opposition to motion for sanctions against Adam Waldman ([JD-OppAdamWaldman](#)) ✓
 - 1. any documents with personally identifying information, medical records, or private journals/entries
 - 5. financial information must be redacted, though documents themselves shall not be designated as confidential
- **26. 09. 2019 – foreign subpoena for Bloom Hergott...** ([pdf](#))
- **27. 09. 2019 – AH's expanded motion to compel praecipe** ([pdf](#))

- **27. 09. 2019 – AH's expanded motion to compel documents and release medical records** ([pdf](#))
- **2019 – foreign subpoena for dr. David Kipper**
- **27. 09. 2019 – AH's memorandum in support of her expanded motion to compel JD to produce documents and release medical records** ([AH-MemoJDsDocs+Medical](#), [pdf2](#)) ✓
 - Mr. Depp claims that **footage from another of his residences** will prove he did not abuse Ms. Heard... he refuses to provide information about **the Sweetzer Avenue** footage, including what exists and how it is maintained. (p. 4 of pdf, sub. 4)
 - Dr. Kipper... witnessed or learned about injuries that Ms. Heard suffered at Mr. Depp's hand. (p. 5)
 - disputed requests for production regarding JD's or AH's use of drugs (p. 8 – 9 of pdf, appendix A)
 - AH's 1st RFPs from 30. 7. 2019 (p. 13 – 27 of pdf, exh. A)
 - JD's response and objections to AH's 1st RFPs from 3. 9. 2019 (p. 29 – 69 of pdf, exh. B)
 - letter from AH's lawyers regarding AH's discovery requests and calendar schedule from 20. 9. 2019 (p. 70 – 76 of pdf, exh. C)
 - emails between JD's and AH's lawyers regarding AH's discovery requests from 20. – 24. 9. 2019 (p. 79 – 83 of pdf, exh. D)
 - letter regarding dr. Kipper's subpoena, from 18. 9. 2019 (p. 85 – 90 of pdf, exh. E) [dr. Kipper provided AH's medical records which contain texts, sms, emails, social media messages, etc. and will testify subject to PHI; texts were destroyed when dr. Kipper's phone was damaged and replaced in 2018]
- **04. 10. 2019 – JD's response to AH's motion to compel praecipe** ([pdf](#))
- **04. 10. 2019 – JD's opposition to AH's motion to compel documents** ([pdf](#))
- **04. 10. 2019 – foreign subpoena for Bloom, Hergott, Diemer...** ([pdf](#))
- **04. 10. 2019 – AH's demurrer and plea in bar praecipe** ([pdf](#))
- **04. 10. 2019 – AH's motion for leave to file amended pleadings praecipe** ([pdf](#))
- **07. 10. 2019 – AH's 1st ROGs** are extracted from JD's responses and objections to AH's 1st ROGs from 28. 10. 2019 and are exhibit C in AH's memorandum in support of her motion to strike JD's expert disclosures and for bifurcation from 8. 11. 2019, p. 42 – 68 of pdf ([AH-MemoStrikeExpert](#)) ✓
 - 1. everyone related to anything in this claim, plus their contact information
 - 2. who, if anyone, has assisted anyone else in preparing a legal statement
 - 3. identify all devices in your possession, incl. all that were owned or used by AH
 - 4. identify all emails, social media and chat applications
 - 5. identify any pseudonyms, nicknames etc.
 - 6. identify all private aircraft used
 - 7. identify each entity you control or own
 - 8. all electronic systems listed in answer to ROG no. 7, related to incoming and outgoing payments to anyone listed in RFP no. 16 from 2010 onwards
 - 9. every mental and/or physical health care provider from 2010 onwards

- 10. physician/health care provider, type and dosage of prescription drug, and pharmacist for each prescription drug from 2010 onwards
- 11. for each incident alleged in AH's declaration state if you were under influence or alcohol, medication or drugs, the identity, amount, date and time of consumption, name and address of consumption, provider, witnesses, and effect
- 12. all romantic partners for past 10 years
- 13. details from any agreements with any romantic partners
- 14. identify and describe any public or private instance of alleged physical violence, abuse or destruction of property for past 15 years, incl. people, property, possible substance use, date, time and location
- 15. personal info, profession and qualification of expert witnesses
- 16. details of all facts which support or relate to any claim of monetary relief as part of this case
- 17. all judicial or administrative proceedings from 2010 onwards
- **11. 10. 2019 – hearing for AH's motion for leave to file amended responsive pleadings**
- **15. 10. 2019 – foreign subpoena for Elon Musk ([pdf](#))**
- **16. 10. 2019 – continuance order ([pdf](#)) ✓**
- **18. 10. 2019 – motion for leave to withdraw Joshua Matz as counsel of record ([pdf](#))**
- **18. 10. 2019 – hearing for AH's motion to compel RFPs 4, 5, 38 and 41 is exhibit A of her emergency motion to compel and to enforce the courts Oct 18th order and memorandum in support from 1. 11. 2019, 8 – 36 of pdf ([AH-EmergencyOct18Order, pdf2](#)) ✓**
 - the motion was granted
- **18. 10. 2019 – order that JD shall produce all non-privileged documents and a HIPAA waiver is p. 33 of pdf in AH's motion to compel & memorandum production of documents and responses to AH's 1st, 2nd, 4th and 5th RFPs ([AH-Product](#)) ✓**
- **18. 10. 2019 – order for continued hearing for JD's production of documents ([pdf/pdf](#))**
- **25. 10. 2019 – notice of appearance for Jennifer Nelson ([pdf](#))**
- **25. 10. 2019 – opposed motion of the Virginia Press Association for leave to file amicus curiae brief ([pdf](#))**
- **28. 10. 2019 – JD's responses and objections to AH's 1st ROGs are exhibit C in AH's memorandum in support of her motion to strike JD's expert disclosures and for bifurcation from , p. 42 – 68 of pdf ([AH-MemoStrikeExpert](#)), p. 12 – 13 are also on p. 35 – 38 of pdf in AH's memorandum to compel JD's production of original devices and operating system drives and cloud backups as requested in her 14th, 15th and 16th RFPs ([AH-MemoJDsDevices-Attachs](#)), and p. 15 – 24 are also on p. 208 – 221 of pdf in AH's memorandum in support of motion to compel responses to 11th and 12th RFPs from 24. 11. 2021 ([AH-MemoFor11+12](#)) ✓**
 - 1. JD's list of people related to the case and of whom AH wishes to gain contact information about (p. 10 – 12; p. 51 – 53 of pdf)
 - 3. JD possesses iPhone, iPad, MacBook Pro, iCloud account, and devices and data belonging to Stephen Deuters collected in May 2017 (iPad and iPhone) and Nathan Holmes collected in March 2018 (iPhone)

- incident with Gregg "Rocky" Brooks on 12. 4. 2017 (p. 21; p. 62 of pdf)
- **list of judicial or administrative proceedings involving JD from 2010** (p. 23 – 24; p. 64 – 66 of pdf)
- **28. 10. 2019 – foreign subpoena for Sepehr Daghighian, Hackler Daghighian Martino & Novak** ([pdf](#))
- **28. 10. 2019 – order withdrawing AH's counsel** ([pdf](#))
- **29. 10. 2019 – foreign subpoena for Joshua Drew** ([pdf](#))
- **29. 10. 2019 – foreign subpoena for iO Tillet Wright** ([pdf](#))
- **31. 10. 2019 – JD's motion to strike AH's praecipe** ([pdf](#))
- **31. 10. 2019 – JD's memorandum in support of motion to strike AH's praecipe** ([pdf](#))
 - [praecipe](#) from 4. 10. 2019 (p. 5 of pdf, exh. A)
 - JD's motion to strike AH's [praecipe](#) from 31. 10. 2019 (p. 6 – 7 of pdf, exh. A)
- **31. 10. 2019 – meet & confer**
- **01. 11. 2019 – AH's rule 4:10 motion for IME of JD** ([pdf](#)) ✓
 - AH wants David R. Spiegel as examiner, the examination is to last about 8 hours and would be preceded by dr. Spiegel reviewing JD's pertinent medical, psychiatric and counseling records [[ah, so this is what it's about](#)]
- **01. 11. 2019 – AH's memorandum in support of rule 4:10 motion for IME of JD** ([AH-MemoIME](#)) ✓
 - Rule 4:10(a)... provides that "[w]hen the mental or physical condition... of a party... is in controversy, the court... upon motion of an adverse party, may order the party to submit to a physical or mental examination by one or more health care providers... employed by the moving party... on a motion for good cause shown." (p. 1)
 - Dr. Spiegel is a board-certified psychiatrist licensed by the Virginia Board of Medicine and in good standing. (p. 4)
 - [request for TRO](#) from 27. 5. 2016 (p. 10 – 14 of pdf, exh. 1)
 - CA [declaration](#) of Amber Heard from 26. 5. 2016 (p. 16 – of pdf, exh. 1)
 - dr. David Spiegel CV from 23. 10. 2019 (p. 21 – 30 of pdf, exh. 2)
- **01. 11. 2019 – JD's response to non-party VPA's motion for leave to file amicus curiae brief praecipe** ([pdf](#))
- **01. 11. 2019 – JD's opposition to Virginia Press Association's motion for leave to file amicus curiae brief** ([JD-OppVPA](#)) ✓
 - ...the VPA admitted it did no due diligence on the underlying facts prior to joining Ms. Heard's large and expanding legal team. (p. 2)
 - Indeed, when asked, the VPA refused to shed any light on Ms. Heard's brand new, partial "defense", *nowhere mentioned in her prior declarations*, that she did not author the title of her op-ed. (p. 3)
 - emails between Ms. Nelson and Mr. Chew from 21. 10. 2019 (p. 8 – 13 of pdf, exh. A) – **VPA did no due diligence prior to taking AH's side**
- **01. 11. 2019 – JD's response to AH's motion for leave to file amended responsive pleading praecipe** ([pdf](#))

- **01. 11. 2019 - JD's opposition to AH's motion for leave to file amended responsive pleading ([JD-OppAmendedPlead](#)) ✓**
 - reference to article *A timeline of Johnny Depp and Amber Heard's ongoing legal battle* by Sonia Rao for the [Washington Post](#) from 22. 5. 2019 (p. 4)
 - reference to article *Johnny Depp's Pirates of the Caribbean-Related Lawsuit Against Amber Heard Set A Trial Date* by Gina Carbone for [Cinema Blend](#) from 29. 6. 2019 (p. 4)
 - [notice](#) of scheduling conference from 24. 4. 2019 (p. 8 – 10 of pdf, exh. A)
- **01. 11. 2019 – AH's emergency motion to compel and to enforce the courts Oct 18 order and memorandum in support ([AH-EmergencyOct18Order, pdf2](#)) ✓**
 - transcript of hearing from 18. 10. 2019 (p. 8 –36 of pdf, exh. A)
 - order granting AH's motion to compel discovery from 18. 10. 2019 (p. 38 of pdf, exh. B)
 - JD's HIPPA privacy authorization form **in relation to alcohol/drug abuse treatment and physical injuries** from 25. 10. 2019 which expires on 3. 1. 2020 (p. 40 – 41 of pdf, exh. C)
 - emails between Mr. Gilmore, Mr. Rottenborn and Ms. Vasquez regarding HIPPA waiver from 31. 10. and 1. 11. 2019 (p. 43 – 45 of pdf, exh. D)
 - p. 15 – 17 of JD's responses and objections to AH's 1st ROGs (p. 47 – 50 pdf, exh. E)
- **04. 11. 2019 – JD's designation/identification of expert witnesses** is exhibit A in AH's memorandum in support of her motion to strike JD's expert disclosures and for bifurcation, p. 11 – 19 of pdf ([AH-MemoStrikeExpert](#)) and exhibit C in AH's motion for continuance based on JD's discovery abuses from 25. 11. 2019, p. 25 – 53 of pdf ([AH-MotContinuance](#)) ✓
 - **JD's experts:** entertainment industry expert Richard Marks, technical forensics expert Bryan Neumeister, economic damages expert Michael Spindler, non-retained experts Jack Wigham and Christian Carino (JD's agents since Oct 2016), Edward White (JD's business manager and accountant since Mar 14 2016), Robin Baum (one of Hollywood's leading publicists)
- **04. 11. 2019 – JD's 2nd RFPs** are extracted from AH's responses and objections to JD's 2nd RFPs from 25. 11. 2019 which are exhibit 1 in JD's memorandum in support of his motion to compel AH's responses to 2nd and 3rd RFPs and 2nd ROGs from 29. 10. 2020, p. 10 – 26 of pdf ([JD-Memo2+3RFP+2ROG](#)) ✓
 - 1. – 2. all related to violence and narcotics with any employee from 2013 onwards
 - 3. all regarding alcohol or drug use or abuse by you or JD from 2013 onwards
 - 4. payments to media from 2015 onwards
 - 5. all between AH and Ms. Pennington, Mr. Wright, Ms. Marz, Ms. Henriquez and Mr. Depp that mention JD or other romantic partners from 2010 to Apr 2019
 - 6. all between AH and dr. Kipper related to JD
 - 7. arrests
 - 8. complete copy of medical records from 2010 onwards
 - 9. copies of personal journals from 2010 onwards
 - 10. all correspondence related to any medical/physical health care and insurer from 2010 onwards

- 11. enough to show prescription drugs from 2010 onwards
- 12. – 13. copies of expert witnesses' reports and docs they relied on
- 14. copies of all exhibits for this litigation
- 15. copies of all written statements and drafts
- 16. all docs relied on in answering ROGs
- 17. everything else related to complaint, declaration, op-ed, 2016 declaration
- 18. all related to anyone related to claims or defenses
- 19. – 22. all related to ACLU, op-ed, Virginia Press Association
- 23. – 24. all related to The Sun
- 25. all related to AH's financial assistance in this litigation
- 26. everything else related to this litigation
- **04. 11. 2019 – JD's 2nd ROGs**
 - 5. identify each mental and/or physical care provider, incl. emergency rooms, treatments and therapies
 - 6. identify prescription drugs and providers
- **04. 11. 2019 – meet & confer**
- **06. 11. 2019 – Josh Richman's declaration ([JosRi 19-11-06 dc](#)) ✓**
 - 2. I have known and considered Johnny Depp a friend for approximately 33 years.
 - 3. I attended Johnny's wedding ceremony with Amber Heard in the Bahamas on February 7, 2015. [I'm getting really confused about the marriage date. were they married on Feb 1 or Feb 3 or Feb 7? or do different dates refer to the California ceremony and the Bahamas ceremony?]
 - 6. I remember that Amber, her sister and friends seemed inebriated or drugged out through much of the wedding weekend. [Mr. Wright's [text1](#) and [text2](#) after Mr. Richman's declaration came out regarding Mr. Wright's nickname 'iSlapRocky']
- **07. 11. 2019 – foreign subpoena for Ellen Barkin ([pdf](#))**
- **07. 11. 2019 – foreign subpoena for Paul Bettany ([pdf](#)) ✓**
 - dates requested are very specific (p. 9 – 10 of pdf)
 - two [tweets](#) and [tweets](#) from Paul Bettany from 28. 6. 2016 (p. 12 of pdf)
 - civil intake sheet, final deposition, civil case coversheet (p. 26 – 28 of pdf, exh. B)
 - JD's [complaint](#), with exhibits, from 1. 3. 2019 (p. 29 – 68 of pdf, exh. B)
- **08. 11. 2019 – JD's response to AH's rule 4:10 motion for IME praecipe ([pdf](#))**
- **08. 11. 2019 – JD's opposition to AH's rule 4:10 motion for IME ([pdf](#)) ✓**
- **08. 11. 2019 – order denying leave to file amicus brief for VPA ([pdf](#)) ✓**
- **08. 11. 2019 – order granting AH to file amended plea in bar and demurrer ([pdf](#)) ✓**
- **08. 11. 2019 – AH's motion to strike JD's expert disclosures and for bifurcation praecipe ([pdf](#))**
- **08. 11. 2019 – AH's motion to strike JD's expert disclosures and for bifurcation ([pdf](#))**
- **08. 11. 2019 – AH's memorandum in support of her motion to strike JD's expert disclosures and for bifurcation ([AH-MemoStrikeExpert](#), [pdf2](#)) ✓**
 - JD's experts (p. 9 of pdf, appendix)
 - JD's designation/identification of expert witnesses from 4. 11. 2019 (p. 11 – 19 of pdf, exh. A)

- Richard Marks' CV (p. 21 – 26 of pdf, exh. B)
- Bryan Neumeister's CV (p. 28 – 35 of pdf, exh. B)
- Michael Spindler's CV (p. 37 – 40 of pdf, exh. C)
- JD's responses and objections to AH's 1st ROGs from 28. 10. 2019 (p. 42 – 68 of pdf, exh. C)
- [scheduling order](#) from 27. 6. 2019 (p. 70 – 72 of pdf, exh. B)
- **12. 11. 2019 – order withdrawing Mr. George as AH's counsel** ([pdf](#)) ✓
- **13. 11. 2019 – calendar control order** ([pdf](#)) ✓
- **14. 11. 2019 – foreign subpoena for Jerry Bruckheimer** ([pdf](#))
 - [video](#) of Stuart Beattie's saying JD has been cut from the Pirates was published in *Hide the rum! Johnny Depp is out as Jack Sparrow in Disney's Pirates of the Caribbean film franchise as actor battles financial issues and personal dramas* by Ryan Parry & James Desborough for [Daily Mail](#) from 25. 10. 2018, 19:29 GMT
 - article *Disney's Film Production Chief Talks 'Mary Poppins' and His Big Bet on 'The Lion King': 'It's a New Form of Filmmaking'* by Pamela McClintock for the [Holywood Reporter](#) from 20. 12. 2018, 6:30
- **15. 11. 2019 – AH's 1st RFAs** are extracted from JD's responses and objections to AH's 1st RFAs from 20. 12. 2019 which p. 8 – 12 are on p. 248 – 255 of pdf in AH's memorandum in support of motion to compel responses to 11th and 12th RFPs from 24. 11. 2021 ([AH-MemoFor11+12](#)) ✓
 - 1. – 13. admit that you slapped AH, punched AH, slapped or punched AH while wearing rings, choked AH, headbutted AH, kicked AH, pushed or shoved AH, threw a glass bottle or bottles at AH, threw a cell phone or cell phones at AH, threw any other object or objects at AH, destroyed or damaged property in presence of AH, called AH "slut", called AH "whore"
 - 14. admit that you communicated to AH that she would not have any work as an actress when she got old and her "tits sag"
 - 15. admit that you told AH that she would, should, or wanted to "get raped"
- **15. 11. 2019 – AH's 2nd ROGs** are extracted from JD's responses and objections to AH's 2nd ROGs from 20. 12. 2019 whose p. 9 – 11 are on p. 235 – 241 of pdf in AH's memorandum in support of motion to compel responses to 11th and 12th RFPs from 24. 11. 2021 ([AH-MemoFor11+12](#)) ✓
 - 1. any payments, gifts, or transfers of value of any kind from/to JD to/from any past romantic partners
 - 2. fees from every performance from 2010 onwards
 - 3. reasons for any objections from 1st ROGs
- **15. 11. 2019 – hearing's** p. 27 – 28 are exhibit A in AH's motion for continuance based on JD's discovery abuses from 25. 11. 2019, p. 10 – 15 pdf ([AH-MotContinuance](#))
 - Request for an IME is denied. (p. 27) ✓
- **15. 11. 2019 – order denying AH's motion for JD's IME** ([pdf](#)) ✓
- **18. 11. 2019 – application to appear pro hac vice for Davida Brook** ([pdf](#))

- **19. 11. 2019 – Joshua Drew's deposition** (JoDr 19-11-19 dp) is exhibit JD1 of his UK witness statement from 12. 2. 2020, p. E171 – E295 ([JoDr 20-02-12 w](#)), [view](#) (0:45) a tiny part on [deppdive](#) ✓
 - AH may have ordered drugs for the wedding (p. 36 – 38)
 - AH was using mushrooms, LSD, cocaine, ecstasy, wine (p. 40 – 41)
 - Raquel got her [AH] to call her lawyer, Samantha Spector, to find out what to do. And if memory serves, Samantha's recommendation was that we immediately put together a contemporaneous, matter-of-fact statement together of what had transpired that night and that ultimately it was up to Amber as to what she wanted to do with the police or whatever it may be. (p. 69)
 - AH had night-time visitors when JD was away on more than 50 occasions(!) while Mr. Drew was living in PH1 and it started pretty early on: Elon Musk four of five times, Cara Delevingne (three of them in Nov 2016) (p. 85 – 93) [an interesting analysis of AH and Ms. Delevingne relationship is in the [video Who caused Cara Delevingne's black eye? \(10:33\)](#) by Rubiks Glass (12. 11. 2020)]
 - JD was using opioids, ecstasy, pills, other substances, prescriptions, nonprescription medication, alcohol, cigarettes (p. 137 – 143)
 - JD was doing private treatments for sobriety several times (p. 143)
 - JD in Bahamas in Aug 2014 for a very hard-core detox with one of the two private nurses and AH ... JD was trying to kick opioids (p. 159 – 161)
 - when JD was high or intoxicated, he was stumbling, discombobulated, slurring his words, the generalized behaviour (p. 194)
 - JD's phone was a black leather wallet-like booklet with slots for credit cards that folded over the screen (p. 226) [oh? I thought it was just a phone. wouldn't the fold-over part interfere with the flying projectory? wouldn't it also leave a mark on a face? especially if it's leather and thrown with such force? no credit card fell out when the phone went flying or fell down? the screen was undamaged after being thrown and hitting sth with such force? that JD has a phone and a wallet together, is corroborated by Mr. Jenkins draft declaration from 6. 2019, np. 4 ([StJe 19-06-?? dc](#))]
 - the order of exhibits is not as stated on p. 6 of the transcript, no. of exhibits refer to the deposition, not the witness statement (for which they are also numbered)
 - sketch of Eastern Columbia Building's condos (p. E296, exh. 1)
 - CA [deposition](#) of officer Melissa Saenz from 18. 7. 2016 (p. E297 – E313, exh. 2)
 - CA [deposition](#) of officer Tyler Hadden from 18. 7. 2016 (p. E314 – E333, exh. 3)
 - [LAPD2](#) incident recall LPD1605210005437 for the second 911 call (p. E334, exh. 4)
 - CA declaration of Raquel Rose Pennington from 27. 5. 2016, with exhibits – for those see under her declaration (p. E335 – E345, exh. 5)
 - texts between Mr. Drew and AH regarding statements, flea market, locksmith from 22. 5. 2016, 10:58 – 13:03 (p. E344 – E345, exh. 6) [13:03:53 waiting for locksmith]
 - VA declaration of Amber Laura Heard from 10. 4. 2019, with exhibits (p. E346 – E379, exh. 7)
 - texts between Mr. Drew and AH from 12. 3. 2015, 17:52 – 19:06 (p. E361, exh. 8)

- [texts](#) between Mr. Drew and AH regarding dinner, tattoo of her, **AH talking about threatening JD**, and a [photo](#) of **knives** from 13. 1. 2015, 17:52 – 21:42 (p. E362, exh. 9) [**that's before the wedding**] [**one could argue that these texts fall into the same category of texts between friends as texts between JD and Mr Bettany about AH, although between JD and Mr Bettany there were no real weapons involved. it's her admission of using threats on JD that is the most disturbing here.**]
- [photo](#) of a kitchen counter with gold writing *Why be a fraud! All is such bullshit...* (p. E366, exh. 10)
- twelve photos of alleged AH's injuries from 12. 2015, listed below (p. E368 – 379, exh. 11) [**are this from her declaration from 10. 4. 2019?**]
- reddish [photo](#) of AH en face in white T-shirt in a bathroom looking R up (p. E368)
- reddish [photo](#) of AH en face in white T-shirt in a bathroom looking L up (p. E369)
- reddish [photo](#) of AH in half-profile in white T-shirt in a bathroom (p. E370)
- [same](#) as on p. E368 (p. E371)
- cut-out of less reddish [photo](#) of AH in white T-shirt in a bathroom (p. E372)
- reddish [photo](#) of AH in white T-shirt in a bathroom looking straight (p. E373)
- [photo](#) of AH's left cheek in embroidered yellow sweater (p. E374)
- [same](#) as on p. E372 (p. E375)
- reddish [photo](#) of AH in a bathroom from more above (p. E376)
- reddish [photo](#) of AH in white T-shirt looking right and with what may be blood on her lower lip (p. E377) [**where is this 'blood' in all previous white T-shirt photos?**]
- reddish [photo](#) of AH in white T-shirt looking down (p. E378)
- [photo](#) of alleged AH's scalp with alleged torn-out part with some reddish splotches around (p. E379) [**and now that Andy drew our attention to it, there is indeed a piece of paper with a note scribbled on it, quite clearly visible in fact.**]
- [photo](#) of a clump of blond hair on the floor, with a female digit pointing at it (p. E381, exh. 12)
- [photo](#) of a splintered wooden bedframe with a folded pocket knife in the bedding (p. E382, exh. 12)
- reddish [photo](#) of AH without visible clothes on and with two necklaces with a lamp in the background looking down; similar to photo on p. E341 from Ms. Pennington's declaration further up, but of lower quality, and of photo on p. E368 (p. E383, exh. 13)
- [photo](#) of neatly stacked pictures in frames on a bed, all looking up, with cracked glass, on a bed, photo in native format (p. E385, exh. 13)
- [photo](#) of two perfectly aligned framed pictures on a wall, the upper one has cracked glass, photo in native format (p. E387, exh. 13)
- [photo](#) of glass splinters and stains on a red carpet in the middle platform of a staircase, photo in native format (p. E389, exh. 13) [**I think that the longish darker slightly curved shape at the top corner of the platform might actually be the same as the big glass splinter on the following photo, just differently coloured because of the lighting**]
- [photo](#) of two stairs and the middle platform of a staircase covered in a red carpet with glass splinters, photo in native format (p. E391, exh. 13)

- [photo/photo](#) of a stripe-carpeted hallway in Eastern Columbia Building with stains, photo in native format (p. E393, exh. 13) [this definitely looks like freshly spilled liquid/wine, still reflecting the light. but it is not on the bodycam footage, sorry. it's difficult to say from the photo, but the position may actually be in front of PH1. why is there no photo of the wine on the wall?]
- [photo](#) of a whole wine bottle with clearly seen label and a liquid stain on a wooden floor, photo in native format (p. E395, exh. 13) [judging from the carpet and furniture, this is no magnum sized bottle of anything]
- reddish photo of AH looking right down, photo in native format (p. E397, exh. 14)
- reddish [photo](#) of AH in blue clothes and two earrings in half-profile looking right with red splotches on right cheek (same as on photo on p. E343 of Ms. Pennington's declaration), photo in native format (p. E399, exh. ?)
- [photo](#) of AH with two same earrings as above in half-profile with eyes closed, photo in native format (p. E401, exh. 15)
- same [photo](#) as on p. E399, just yellowish, photo in native format (p. E402, exh. 15)
- Mr. Drew's email to AH with his and Ms Pennington's statements written the same day about May 21 incident, from 22. 5. 2016, 21:43 (p. E403 – E406, exh. 16)
- plan of PHs with notes, the date on the plot says it was printed on 11. 2. 2008 (p. E407, exh. 17) [[2Dplan](#) and [3Dplan](#)]
- screenshots of texts with nine photos with upturned clothes racks that Whitney Hear sent to Kevin Murphy on 23. 5. 2015, 6:57 and 8:35, and are also part of Whitney's witness statement (p. E409 – E413, exh. 18)
- [declaration](#) of Johnny Depp from 5. 2019 (p. E414 – E426i, exh. 19)
- **20. 11. 2019 – Isaac Baruch's deposition** (IsBa 19-11-20 dp)
- **21. 11. 2019 – letter** ([pdf](#))
- **21. 11. 2019 – motion to admit pro hac vice Davida Brook as co-counsel for AH** ([pdf](#))
- **22. 11. 2019 – JD's motion to use prior depositions praecipe** ([pdf](#))
- **22. 11. 2019 – JD's motion to use prior depositions** ([pdf](#))
- **22. 11. 2019 – JD's memorandum in support of motion to use prior depositions** ([JD-MemoPriorDepos](#)) ✓
 - CA [deposition](#) of officer Melissa Saenz from 18. 7. 2016 (p. 9 – 47 of pdf, exh. A)
 - CA [deposition](#) of officer Tyler Hadden from 18. 7. 2016 (p. 49 – 96 of pdf, exh. B)
 - email with the [extortion letter](#) from 24. 5. 2016 (p. 98 – 99 of pdf, exh. C)
- **22. 11. 2019 – Ellen Barkin's deposition** (ElBa 19-11-22 dp)
- **22. 11. 2019 – David Killackey's declaration** ([DaKi 19-11-22 dc](#)) ✓
 - 3. At the request of Mr. Depp I helped facilitate and agreement with the network to restore and customize his wife Amber Heard's 1968 Mustang on an episode of the series "Overhaulin". I was successful in doing so and the filming of the reveal was December 20, 2014.
 - 4. unsettling experience with AH when she asked him to come to help her with a car's interface, left him waiting for 3h, came onto him in the car, then bipolarized into icy when he mentioned dr. Kipper

- 6. Approximately June 2016 I received direction from Kevin Murphy to separate the billing on work related to the Mustang. [so, AH wasn't paying for her car when she was with JD, JD was] ... I immediately informed Amber...
- 7. Her first reaction was to verbally abuse me with expletives, threats and a continued rant over what she claimed was an **unfortunate financial downturn of her personal finances caused by Mr Depp**. ... Amber stated that there was a legal agreement between herself and Mr Depp drawn by their attorneys and signed by both parties. **She said in this agreement Mr Depp was responsible for paying her bills and that if I expected payment then I should forward bills to Mr Depp**. I asked her to send me a copy of the agreement... She said it was privileged and she could not send me the agreement... The verbal abuse continued...
- 8. Amber tried everything to convince me to release the car to her without payment. **She claimed to not have money. She said "Johnny's not paying my rent he's not paying my bills ... Fuck him and fuck you!"** [soo very financially independet]
- **25. 11. 2019 – AH's motion for continuance based on JD's discovery abuses ([AH-MotContinuance](#))** ✓
 - p. 27 – 28 from transcript of hearing from 15. 11. 2019 (p. 10 – 15 of pdf, exh. A)
 - emails from Mr. Gilmore to Mr. Chew from 12. 11. 2019 (p. 17 – 23 of pdf, exh. B) – doctors that JD has seen from 2010 incl. psychologist dr. Cowan, couples therapist dr. Amy Banks, limb specialist in Australia dr. Michael Kalamaras, plastic surgeon dr. David Kulber, a dentist who prescribed him opioids following a dental procedure in 2013 or 2014, another plastic surgeon
 - JD's designation/identification of expert witnesses from 4. 11. 2019 (p. 25 – 53 of pdf, exh. C)
- **25. 11. 2019 – AH's responses and objections to JD's 2nd RFPs** are exhibit 1 in JD's memorandum in support of his motion to compel AH's responses to 2nd and 3rd RFPs and 2nd ROGs from 29. 10. 2020, p. 10 – 26 of pdf ([JD-Memo2+3RFP+2ROG](#)), plus requests no. 3, 8 – 11 are on p. 8 – 16 of pdf in AH's memorandum in opposition to JD's motion to compel from 19. 6. 2020 ([pdf](#)), and requests no. 6 – 9, 22 – 26 are on p. 9 – 15 of pdf in AH's memorandum in opposition to JD's motion to compel her responses to 2nd and 3rd RFPs and 2nd ROGs from 11. 12. 2020 ([pdf](#)) ✓
- **25. 11. 2019 – AH's responses and objections to JD's 2nd ROGs** are exhibit 3 in JD's memorandum in support of his motion to compel AH's responses to 2nd and 3rd RFPs and 2nd ROGs from 29. 10. 2020, p. 66 – 80 of pdf ([JD-Memo2+3RFP+2ROG](#)) ✓
 - 1. list of persons
 - 3. devices: cell phone, iPad, two laptops, two iCloud accounts, et alia
 - 5. AH lists 6 doctors (dr. Kipper for general, dr. Cowan for psychotherapy, dr. Bonnie Jacobs for psychology, dr. Laurel Anderson for psychology, dr. Amy Banks for psychology, dr. Joseph Sugerman for ears, nose and throat medicine (plastic surgeries?))
 - 7. – 8. doesn't want to list romantic partners or agreements with them
 - 11. litigation Nicola Six v. Heard [[is this the London Fields suit?](#)]
- **26. 11. 2019 – JD's response to AH's motion for continuance ([pdf](#))** ✓

- JD has thus far produced 3652 pages or images, AH only 870 (of which each text message is a standalone document and which don't include any documents related to her physical assaults against JD and others) (p. 1)
- 89 security camera videos from Eastern Columbia Building which show AH had no marks on her face after 21. 5. 2016 (p. 2)
- 26. 11. 2019 – Elizabeth Marz's deposition (ElMa 19-11-26 dp)
- 27. 11. 2019 – calendar control order ([pdf](#)) ✓
- 11. 2019 – Ben King's declaration ([19-11-?? dc](#)) ✓
 - 2. I worked for them for 1 month in London in October 2014 and for 7 months in Australia from February, 2015 to August, 2015.
 - 4. In March 2015, I was summoned... urgently to the rented house... in Australia. ... I found significant damage, including that the bar area on the lower ground floor was a scene of devastation. The mirror behind the bar was heavily cracked and damaged and there were many smashed bottles and broken glass strewn on and around the bar.
 - 8. M.s Heard said: "Have you ever be so angry with someone that you just lost it?"
- ???? – Malcolm Connolly's declaration ([MaCo ??-??-?? dc](#)) ✓
 - 3. I have read Amber's account of the incident, and I can say that Amber's account of when we had to take Johnny to the hospital to treat his finger injury on March 8, 2015 bears no resemblance to my recollection.
 - 9. I had the car door open and when we were outside Johnny said to me words to the effect of: "Look at my finger. She's cut my f*cking finger off. She's smashed my hand with a vodka bottle." ... He also told me that she had put a cigarette out on his cheek. I could see the mark on his face.
 - 11. Amber... did not have any marks on her face or arms. She didn't look to be in any physical distress. ... Johnny... was obviously in emotinal distress and panicking, but he didn't appear that intoxicated or out of it though, and he was easily standing on his own and having a conversation.
 - ? [Amber]... was absolutely hysterical. I was worried that she might start throwing objects at Johnny (or at myself), as I had seen her throw objects before. For example, I had seen her lob a fork in Johnny's general direction once; another time I recall she threw a lighter at him; another time a can of coke.
 - 17. We went with the onion cover story. The specialist didn't believe us for one second.
- 02. 12. 2019 – AH's letter to judge White about David Killacky's declaration ([pdf](#)) ✓
 - reference to article *Amber Heard's Father Accused Of Threatening To Shoot Johnny Depp* by Mike Walters for [The Blast](#) from 30. 11. 2019, 16:42
- 05. 12. 2019 – foreign subpoena for officer Tyler Hadden ([pdf](#))
- 05. 12. 2019 – foreign subpoena for officer Melissa Saenz ([pdf](#))
- 05. 12. 2019 – JD's letter to judge White answering AH's letter ([pdf](#)) ✓
- 05. 12. 2019 – order admitting counsel for AH ([pdf](#)) ✓

- 06. 12. 2019 – foreign subpoena for dr. Connell Cowan ([pdf](#))
- 06. 12. 2019 – foreign subpoena for Debbie Lloyd ([pdf](#))
- 06. 12. 2019 – foreign subpoena for Monroe Tinker ([pdf](#))
- 06. 12. 2019 – JD's opposition to AH's amended demurrer and plea in bar praecipe ([pdf](#))
- 06. 12. 2019 – JD's opposition to AH's amended demurrer and plea in bar ([JD-OppAmendDemurr](#)) ✓
 - Ms. Heard admitted in her first motion to dismiss that the supposed "dozens of violent episodes throughout" Ms. Heard's and Mr. Depp's relationship were "the basis for Ms. Heard's perspective as a domestic abuse victim"... (p. 8)
 - Ms. Heard's argument that Mr. Depp's claims are barred by the statute of limitations fails. (p. 15)
 - article *What Happened After Amber Heard Spoke Out About Johnny Depp* by Ella Cerón for [The Cut](#) from 19. 12. 2018 (p. 19 – 21 of pdf, exh. 1)
 - article *Amber Heard speaks out again about domestic abuse, despite consequences she says she paid* by Maria Puente for [USA Today](#) from 18. 12. 2018, 20:29 ET (p. 23 – 26 of pdf, exh. 2)
 - article *Johnny Depp Allegedly Tried to Get Amber Heard Fried from 'Aquaman' like the Vindictive D*ck He Is* by Mike Redmond for [Pajiba](#) from 19. 4. 2019 (p. 28 – 30 of pdf, exh. 3)
 - article *A timeline of Johnny Depp and Amber Heard's ongoing legal battle* by Sonia Rap [sp?] for the [Washington Post](#) from 22. 5. 2019 (p. 32 – 35 of pdf, exh. 4)
 - article *Cause Celeb: Amber Heard backs 'revenge' porn' bill on Capitol Hill* by Emily Heil for the [Washington Post](#) from 22. 5. 2019 (p. 37 of pdf, exh. 5)
- 06. 12. 2019 – AH's memorandum in opposition to JD's motion to use prior depositions ([AH-MemoOppPriorDepos](#)) ✓
 - judgement of the dissolution of marriage from 13. 1. 2017 (p. 10 – 64 of pdf, exh. A)
 - AH's [request for TRO](#) from 27. 5. 2016 (p. 66 – 70 of pdf, exh. B)
 - CA [divorce/TRO declaration](#) of Amber Heard from 26. 5. 2016 (p. 72 – 75 of pdf, exh. B)
 - CA declaration of Raquel Pennington from 26. 5. 2016 (p. 77 – 80 of pdf, exh. B)
 - three b/w photos of alleged damage to AH's face from Ms. Pennington's declaration (p. 82 – 85 of pdf, exh. B)
 - CA [declaration](#) & [dc2](#) of Samantha Spector from 27. 5. 2016 (p. 85 – 86 of pdf, exh. B)
 - [email](#) from Samantha Spector to Laura Wasser regarding ex parte notice from 26. 5. 2016, 9:52 (p. 88 of pdf, exh. B)
 - email with the [extortion letter](#) from 24. 5. 2016 (p. 91 – 92 of pdf, exh. B)
 - [notice](#) of court hearing about TRO and its approval from 27. 5. 2016 (p. 94 – 102 of pdf, exh. C)
 - stipulation and order regarding dismissal of AH's request for TRO from 16. 8. 2016 (p. 104 – 105 of pdf, exh. D)
- 09. 12. 2019 – foreign subpoena for Amanda de Cadenet ([pdf](#))

- 09. 12. 2019 – foreign subpoena for officer Tyler Hadden ([pdf](#)) – about body cam
- 09. 12. 2019 – foreign subpoena for LAPD Discovery Section ([pdf](#)) – about body cam
- 09. 12. 2019 – foreign subpoena for officer Melissa Saenz ([pdf](#)) – about body cam
- 12. 12. 2019 – affidavit of service for officer Tyler Hadden ([pdf](#))
- 12. 12. 2019 – affidavit of service for officer Melissa Saenz ([pdf](#))
- 12. 12. 2019 – agreed order on a removed hearing ([pdf](#)) ✓
- 13. 12. 2019 – Lisa Beane's deposition (LiBe 19-12-13 dp)
- 13. 12. 2019 – hearing's p. 4, 29 – 32 are on p. 46 – 48 of pdf in JD's reply memorandum in opposition to motion for sanctions against Adam Waldman from 16. 10. 2020 ([JD-OppAdamWald](#)) ✓
 - regarding use of depositions of officers Saenz and Hadden from 18. 7. 2016
 - ...at our last hearing... we talked about whether or not someone was going to try to make press releases... And representation I had from both counsel was that they could control everybody... Yet, that turned out not to be correct. (p. 29)
 - So I can only suspect that it is someone on the defense's side that made that press release. (p. 30)
- 13. 12. 2019 – order granting JD using prior depositions of officers Hadden and Saenz ([pdf](#)) ✓
- 13. 12. 2019 – AH's reply memorandum in support of demurrer and plea in bar seeking dismissal of all claims ([pdf](#)) ✓
- 13. 12. 2019 – foreign subpoena for Sean Bett ([pdf](#))
- 13. 12. 2019 – foreign subpoena for Stephen Deuters ([pdf](#))
- 13. 12. 2019 – foreign subpoena for Stephen Rodrick ([pdf](#))
- 13. 12. 2019 – foreign subpoena for Megan Silverman ([pdf](#))
- 13. 12. 2019 – foreign subpoena for ZZIDIDDLE, Inc. d/b/a Tourjet ([pdf](#))
 - about flights to/from Moscow on 26. – 28. 6. 2013 and Boston – Van Nuys on 24. 5. 2014
- 18. 12. 2019 – Kristina Sexton's deposition (KrSe 19-12-18 dp)
- 20. 12. 2019 – JD's responses and objections to AH's 1st RFAs's p. 8 – 12 are on p. 248 – 255 of pdf in AH's memorandum in support of motion to compel responses to 11th and 12th RFPs from 24. 11. 2021 ([AH-MemoFor11+12](#)) ✓
 - they are all denied
- 20. 12. 2019 – JD's responses and objections to AH's 2nd ROGs's p. 9 – 11 are on p. 235 – 241 of pdf in AH's memorandum in support of motion to compel responses to 11th and 12th RFPs from 24. 11. 2021 ([AH-MemoFor11+12](#)) ✓
- 20. 12. 2019 – JD's responses and objections to AH's 3rd RFPs's p. 11 – 12 are on p. 58 – 62 of pdf in AH's memorandum in support of motion to compel RFPs and responses to ROGs and RFAs from 02. 07. 2020 ([pdf](#)) ✓
- 30. 12. 2019 – foreign subpoena for officer Tyler Hadden ([pdf](#))
- 30. 12. 2019 – foreign subpoena for officer Melissa Saenz ([pdf](#))
- 2019 – foreign subpoena for Walt Disney Pictures
- 2019 – foreign subpoena for the Management Group

- **03. 01. 2020 – foreign subpoena for Sean Bett** ([pdf](#), [pdf](#))
- **03. 01. 2020 – foreign subpoena for Stephen Deuters** ([pdf](#), [pdf](#))
 - refers to article *Johnny Depp Assistant Says Texts Were Doctored* for [TMZ](#) from 2. 6. 2016, 11:18 PT [about the plane 'kicking']
- **06. 01. 2020 – co-counsel's consent motion to withdraw** ([pdf](#))
- **06. 01. 2020 – subpoena duces tecum for CHLA** is on p. 180 – 191/204 (the requests are on p. 190 – 191) of pdf of Joelle Rich's 5th UK witness statement from 14. 1. 2021 ([JoRi 21-01-14 w5](#)) but it was filed only on 29. 5. 2020
- **15. 01. 2020 – AH's notice of supplemental authority** ([pdf](#))
 - case law from Joseph Morrissey vs. WTVR from 9. 1. 2020 (p. 5 – 18 of pdf, exh. A)
- **15. 01. 2020 – foreign subpoena for Kelly Milano** ([pdf](#)) [a writer who is using the same lawyer as Brandon McCulloch and Raquel Pennington, criminal defense attorney Anya Goldstein. Mr. McCulloch follows her on twitter and she and Ms. Pennington follow each other. see [here](#).]
- **16. 01. 2020 – order** ([pdf](#))
- **21. 01. 2020 – JD's response to AH's notice of supplemental authority** ([pdf](#))
- **21. 01. 2020 – foreign subpoena for Brandon McCulloch** ([pdf](#))
 - [Mr. McCulloch once dated AH. he allegedly contacted JD witnesses (or supporters?) with this [text](#), but some speculate it was AH herself.]
- **22. 01. 2020 – foreign subpoena for Lauren Shapiro** ([pdf](#))
- **05. 02. 2020 – foreign subpoena for Robin Baum** ([pdf](#))
- **05. 02. 2020 – foreign subpoena for Sean Bett** ([pdf](#))
- **05. 02. 2020 – foreign subpoena for Christian Carino** ([pdf](#))
 - also about the meeting between JD and AH on [21. - 22. 7. 2016]
- **05. 02. 2020 – foreign subpoena for Stephen Deuters** ([pdf](#))
- **05. 02. 2020 – foreign subpoena for Tracey Jacobs** ([pdf](#))
- **05. 02. 2020 – foreign subpoena for Walt Disney Motion Pictures Group** ([pdf](#))
- **05. 02. 2020 – foreign subpoena for Edward White** ([pdf](#))
- **05. 02. 2020 – foreign subpoena for Edward White & Co LPP** ([pdf](#))
- **07. 02. 2020 – foreign subpoena for Jack Whigham** ([pdf](#))
- **11. 02. 2020 – foreign subpoena for Elisa's Attic LLC** ([pdf](#))
- **11. 02. 2020 – foreign subpoena for Christi Dembrowski** ([pdf](#))
- **11. 02. 2020 – foreign subpoena for Stratton Films** ([pdf](#))
- **13. 02. 2020 – AH's notice of supplemental authority** ([pdf](#))
 - case law Justin Fairfax vs. CBS Broadcasting from 11. 2. 2020 (p. 5 – 34 pf, exh. A)
- **13. 02. 2020 – JD's response to AH's notice of supplemental authority** ([pdf](#))
- **26. 02. 2020 – Edward White's 3rd witness statement** (EdWh 20-02-26 w3)
- **27. 02. 2020 – foreign subpoena for Kate James** ([pdf](#)) [is this another Kate James that was not AH's assistant? cause as far as I know she didn't have anything to do with the TRO or the divorce, much less produce an affidavit in support of AH?]

- **07. 03. 2020 – Kate James' declaration** ([KaJa 19-03-07 dc jpg1](#), [jpg2](#), [jpg3](#), [jpg4](#), [jpg5](#), [jpg6](#), [jpg7](#), [jpg8](#), [jpg9](#), [jpg10](#), [jpg11](#))
 - 15. – 20. drug and alcohol abuse: Provigil (three times the prescribed dose daily, three whole tablets a day), vast quantities of red wine each night, Accutane, mushrooms, MDMA [[provigil texts1](#) and [texts2](#) from AH at 8:03 and Ms. Henriquez at 22:10 to Ms. James from 24. 9. 2014. so AH was taking more pills then prescribed.]
 - 19. The assortment of drugs and a great deal of wine would mean that when I woke up in the morning, there would almost always be a barrage of incoherent abuse sent to me from Amber by text between around 2am and 4am. I discovered later that she... had deleted all evidence of abusive texts from that iCloud account. [[she had several iCloud accounts, then. what about Ms. James' phone or account?](#)]
 - 22. I never saw any physical violence by either Amber or Johnny. I saw Amber much more frequently than Johnny, almost every day for three years apart from when she was out of town.
 - 24. ...she actually had me cancel almost all her agreed upon volunteer dates and **to my recollection went only once or perhaps twice to do volunteer work at the [CHLA]** in the 3 years that I worked with her, and that was only right in the beginning.
 - 25. – 26. [letter](#) to the Department of Homeland Security
 - 27. – 32. dogs' smuggling
 - 33. With the benefit of hindsight, I now recognise Amber's behaviour towards me as mental abuse. ... It was an excersice in daily humiliation.
 - 34. Throughout my years working for Amber, **I knew I was witnessing one of the worst scams imaginable. Her callous and calculating ways** never ceased to astound me. ... It was so obvious to me that **she was manupulating him and using him [JD]**.
 - 35. **The wage she paid me forced me to supplement with credit cards and I remained in debt for many years.** ... I knew that the majority of Johnny's team had been with him for decades and loved working for him. He is the polar opposite of difficult or demanding.
 - 36. Amber fired me on 16 February 2015, pretty much right after she got back from their wedding in the Bahamas. ... I was not prepared at all and had no notice. Amber first had me unpack her suitcase. Then she fired me via email that night,... Once Amber fell into one of her bling rages there was nothing anyone could do but try to stay out of her way.
 - texts between Ms. James and AH about drug deliveries (exh. KJ1) not in jpg
 - AH's snooping on JD's phone (exh. KJ1) not in jpg [[eg. emails from AH to Ms. James and back about a phone number AH found on JD's phone, from 29. 8. 2014](#)]
 - [letter](#) to Homeland Security (exh. KJ1) not in jpg
- **10. 03. 2020 – affidavit of service for Kate James** ([pdf](#))
- **11. 03. 2020 – foreign subpoena for Kate James** ([pdf](#))
- **24. 03. 2020 – AH's notice of supplemental authority** ([pdf](#))
 - case law from Svetlana Lokhova vs. Stefan Halper from 27. 2. 2020 (p. 6 – 31 of pdf, exh. A)

- **27. 03. 2020 – judge White's 2st opinion letter where he dismisses three out of four statements of AH's demurrer and denies her plea in bar** ([White-OpLetter2](#), [pdf2](#)) ✓
- **03. 2020 – Penélope Cruz's declaration** (PeCr 20-03-?? dc) ✓
 - Many years have passed and I have not only made 3 movies with him, but I also count on him as a great friend. I've always been impressed by his kindness, his brilliant mind, his talent, and his peculiar sense of humor.
 - [we know of it from *Penélope Cruz and Winony Ryder Defend Johnny Depp in His Defamation Lawsuit Against Amber Heard* by Maria Pasquini for [People](#) from 14. 3. 2020, 17:00]
- **?? . 2020 – Javier Bardem's declaration** (JaBa 20-??-?? dc) ✓
 - I love Johnny. He has always been a true gentleman and an extremely generous and caring friend to my family and myself.
 - On top of that I've had the gift of working with him twice and have experienced his respectful attitude towards every single member of the crew alongside his unique and hilarious sense of humor.
 - I stand by Johnny because I have always seen and felt a true caring and loving man in him — an extraordinary and unique artist who has listened to anyone who needed his help. ... I not only love Johnny but respect him deeply and I thank him for being the free and careless little boy he is in his art and the mature and loving man he is in the lives of others — always there when we need him.
 - I love Johnny because he is a good human being, trapped in the lies and manipulations of toxic beings and yet smiling and loving us all in spite of it. How? Through his music, through his acting, through his silence. This means a lot. Thank you Johnny. Millions of others like me love you deeply.
 - [we know of it from *Javier Bardem Supports Johnny Depp in Defamation Lawsuit Against Amber Heard* by Alecia Fernández for [People](#) from 24. 3. 2020, 15:43]
- **01. 04. 2020 – order denying AH's plea in bar** ([pdf](#)) ✓
- **02. 04. 2020 – foreign subpoena for Laura Divenere** ([pdf](#))
- **05. 05. 2020 – motion to withdraw Elliot Weingarten as counsel** ([pdf](#))
- **11. 05. 2020 – order** ([pdf](#)) ✓
- **18. 05. 2020 – calendar control order** ([pdf](#)) ✓
- **20. 05. 2020 – JD's opposition to AH's motion to dismiss** ([JD-OppDismiss](#)) ✓
 - If they even exist,... the "objects" ["**broken objects and furniture**" which apparently AH has kept since 2016 or perhaps even earlier? was this part of why she robbed JD off most of his furniture from PHs?] could easily be transported if needed... Moreover, assuming arguendo that fragments of furniture from 2016 existed at all, whether such physical evidence would now exist in a condition that "fairly and accurately" depicts how it looked 2016 is a dubious proposition at best. (p. 13 – 14)
 - Johnny Depp's [declaration](#) from 5. 2019 (p. 19 – 40 of pdf, exh. 1) with all the exhibits which are listed below too
 - p. 5 – 7, 348, 353, 369 – 377, 382 – 395 from Amber Heard's CA [deposition](#) from 13. 8. 2016 (p. 42 – 73 of pdf)

- black photo of sth (p. 75 of pdf)
- three black screenshots of texts with photos from 14:40 and 14:46 (p. 77 – 79 of pdf)
- b/w photo of the severed finger (p. 81 of pdf)
- p. 4 – 5, 57 – 58 from Raquel Pennington's CA deposition from 16. 6. 2016 (p. 83 – 96 of pdf)
- p. 353 from AH's deposition from 13. 8. 2016 (p. 99 of pdf)
- CA [deposition](#) of Elizabeth Marz from 15. 7. 2016 (p. 101 – 106 of pdf)
- CA [deposition](#) of officer Melissa Saenz from 18. 7. 2016 (p. 108 – 155 of pdf)
- CA [deposition](#) of officer Tyler Hadden from 18. 7. 2016 (p. 157 – 177 of pdf)
- [text1](#), [text2](#), [text3](#), [text4](#) from AH to JD on 25. 5. 2016, 4:33/16:33 regarding a private letter and why she filed for TRO (p. 179 – 183 of pdf)
- declaration of Isaac Baruch **from 6. 2016 or 21. 1. 2019?** (p. 185 – 190 of pdf)
- deposition of Trinity Esparza from 25. 1. 2019 (p. 193 – 242 of pdf)
- CA [deposition](#) of Cornelius Harrell from 31. 1. 2019 (p. 243 – 271 of pdf)
- deposition of Alejandro Romero from 30. 1. 2019 (p. 272 – 304 of pdf)
- UK [declaration](#) of Brandon Patterson from 1. 2019 (p. 306 – 313)
- b/w still of AH on cctv from 24. 5. 2016, 23:18 (p. 315 of pdf)
- b/w still of AH on cctv from 24. 5. 2016, 21:17 (p. 315 of pdf)
- b/w still of AH on cctv from 25. 5. 2016, 19:19 (p. 316 of pdf)
- declaration of Samantha McMillan from 4. 2019 (p. 318 – 319)
- [letter](#) from AH to Homeland Security regarding Savannah McMillan from ?. 9. ? (p. 321 of pdf)
- declaration of Kevin Murphy from 13. 5. 2019 (p. 323 – 329)
- email from AH to Karl Martin regarding dogs from 9. 10. 2015 at 15:28 (p. 331 of pdf)
- [email1](#) and [email2](#) from AH to Kevin Murphy getting Kate James to lie about the dogs from 11. 10. 2015 (p. 332 – 333 of pdf)
- two b/w [photos](#) of clumps of hair with a finger AH took (p. 335 of pdf) [**or did she?**]
- screenshot of texts between Kevin Murphy and AH from 12. 5. 2016 at 10:39 (p. 338 of pdf)
- screenshot of texts between AH and Sean Bett regarding JD from 21. 5. 2016 at 22:00 (p. 339 of pdf)
- **29. 05. 2020 – foreign subpoena for CHLA** is on p. 180 – 191/204 of pdf of Joelle Rich's 5th UK witness statement from 14. 1. 2021 ([JoRi 21-01-14 w5](#))
- **29. 05. 2020 – meet & confer**
- **01. 06. 2020 – foreign subpoena for CHLA** ([pdf](#))
- **01. 06. 2020 – foreign subpoena for ACLU** is on p. 205 – 229 of pdf of Joelle Rich's 5th UK witness statement from 14. 1. 2021 ([JoRi 21-01-15 w5](#))
- **10. 06. 2020 – affidavit of service for CHLA** ([pdf](#))
- **12. 06. 2020 – AH's motion to compel RFPs, ROG responses and enforce Oct 18th, 2019 order** ([pdf](#))

- **12. 06. 2020 – AH's memorandum in support of her motion to compel RFPs, ROG responses and enforce Oct 18th order ([AH-MemoComplDoc+Oct18, pdf2](#)) ✓**
 - reference to declarations from David Killackey (30. 11.), Kate James (11. 3.), Winona Ryder (12. 3.), Penelope Cruz (14. 3.), Vanessa Paradis (16. 3.), and Javier Bardem (24. 3.) leaked to the press (p. 3)
 - [*Amber Heard's Father Accused Of Threatening To Shoot Johnny Depp* by Mike Walters for [The Blast](#) from 30. 11. 2019, 14:42; [@ThatBrianFella](#)'s twitter from 11. 3. 2020; *Winona Ryder Defends Johnny Depp, Calls Amber Heard Accusations 'Impossible to Believe'* by Mike Walters for [The Blast](#) from 12. 3. 2020, 15:37; *Penélope Cruz and Winona Ryder Defend Johnny Depp in His Defamation Lawsuit Against Amber Heard* by Maria Pasquini for [People](#) from 14. 3. 2020, 17:00; *Johnny Depp's Ex Vanessa Paradis Defends Actor in His Defamation Lawsuit Against Amber Heard* by Nigel Smith for [People](#) from 16. 3. 2020, 14:40; *Javier Bardem Supports Johnny Depp in Defamation Lawsuit Against Amber Heard* by Alecia Fernández for [People](#) from 24. 3. 2020, 15:43]
 - reference to three audios of JD and AH leaked to british newspaper (31. 1., 5. 2, 17. 3.), of which the third has not been produced to NGN (p. 3)
 - [*'I can't promise I won't get physical again, I get so mad I lose it.' Listen as Amber Heard admits to 'hitting' ex-husband Johnny Depp and pelting him with pots, pans and vases in explosive audio* confession by Ben Ashford for [Daily Mail](#) where one of the tapes has been leaked, from 31. 1. 2020, 19:25 GMT; *'See how many people believe you.' Listen as Amber Heard scoffs at Johnny Depp for claiming he's a domestic violence victim, suggesting court would take her side because she's a slender woman in explosive audio* by Ben Ashford for [Daily Mail](#) from 5. 2. 2020, 19:35 GMT; *'I just reacted and I'm sorry. It's below me.' Listen as Amber Heard admits to smashing a door into Johnny Depp's head before 'clocking' him in the jaw, in explosive audio tape confession* by Ben Ashford for [Daily Mail](#) from 17. 3. 2020, 14:12 GMT]
 - reference to audio recording of 911 call leaked to british newspaper (27. 4. 2016) (p. 3) [*'I need to report an assault'. Listen to 911 call made the night Johnny Depp and Amber Heard had blowout fight that ended their toxic 18-month marriage – but both claim tape backs up their version of events* by Ben Ashford for [Daily Mail](#) from 27. 4. 2020, 18:45 GMT]
 - reference to undated screenshots of cctv footage of AH and Mr. Musk leaked to british newspaper (26. 3. 2020) (p. 3) [*Swimsuit-clad Amber Heard is caught on surveillance tape cuddling up to Elon Musk in Johnny Depp's private penthouse elevator, as actor accuses her of starting affair with billionaire a month into their marriage* by Ben Ashford for [Daily Mail](#) from 26. 3. 2020, 16:12 GMT]
 - reference to [tweet](#) by [@ThatBrianFella](#) from 7. 4. 2020 which posted VA [declaration](#) from Ben King, medical records from Gold Coast University Hospital in Australia ([x-ray](#), [photo](#), [discharge letter](#)), [video](#) of 2016 deposition of Raquel Pennington (p. 3)
 - reference to [tweet](#) by [@ThatBrianFella](#) from 1. 5. 2020 which posted VA [declaration](#) of Josh Richman (p. 3)

- reference to article *Johnny Depp Giving \$150 Million To Vanessa Paradis in Split Settlement – Report* by Chris Rogers for [Hollywood Life](#) from 21. 6. 2012, 8:03 EDT (p. 5)
- JD's responses and objections to AH's 1st RFPs from 3. 9. 2019 (p. 10 – 48 of pdf exh. 1)
- JD's responses and objections to AH's 2nd RFPs from 28. 10. 2019 (p. 51 – 72 of pdf, exh. 2)
- JDp's responses and objections to AH's 3rd RFPs from 20. 12. 2019 (p. 74 – 87 of pdf, exh. 3)
- order from 18. 10. 2019 (p. 89 of pdf, exh. 4)
- JD's responses and objections to AH's 1st ROGs from 28. 10. 2019 (p. 91 – 117 of pdf, exh. 5)
- [protective order](#) from 25. 9. 2019 (p. 119 – 132 of pdf, exh. 6)
- JD's ESI proposal to AH from 4. 9. 2019 (p. 134 – 164 of pdf, exh. 7)
 - email from Mr. Treece to Brown Rudnick from 20. 9. 2019, 17:06 (p. 139 of pdf)
 - proposed agreed order (p. 140 – 152 of pdf)
 - AH's search terms (p. 153 – 156 of pdf)
 - email from Mr. Treece to Brown Rudnick from 10. 10. 2019, 12:04 (p. 157 pdf)
 - email between Mr. Treece and Brown Rudnick between 8. and 29. 10. 2019 (p. 158 – 160 of pdf)
 - email Mr. Treece to Brown Rudnick to from 29. 10. 2019 (p. 162 – 164 of pdf)
- email from Mr. Treece to Mr. Chew from 30. 10. 2019 (p. 166 – 174 of pdf) & email from Mr. Treece to Mr. Chew from 12. 11. 2019 (p. 175 – 180 of pdf) & Mr. Treece to Mr. Chew from 4. 12. 2019 (p. 181 – 187 of pdf) & Mr. Treece to Mr. Chew from 7. 2. 2020 (p. 188 – 190 of pdf) (all exh. 8)
- **12. 06. 2020 – AH's friday motions day praecipe** ([pdf](#))
- **12. 06. 2020 – JD's friday motions day praecipe** ([pdf](#))
- **12. 06. 2020 – JD's motion to compel execution of HIPAA releases** ([pdf](#))
- **12. 06. 2020 – JD's memorandum in support of motion to compel AH to provide HIPAA releases** ([JD-MemoHIPAA](#)) ✓
 - Ms. Heard's medical and psychological condition is directly at issue in this action, which centers on the truth or falsity of her claims to have suffered domestic abuse. Notably, Ms. Heard herself demanded – and long ago received – a full HIPAA waiver from Mr. Depp... (p. 1)
 - no. 3 – 6 from AH's responses and objections to JD's 2nd ROGs from 25. 11. 2019 (p. 9 – 14 of pdf, exh. A)
 - AH's [memorandum](#) in support of her expanded motion to compel JD to produce documents and release medical records from 27. 9. 2019 (p. 16 – 23 of pdf, exh. B)
 - email from Mr. Gilmore to Mr. Rottenborn from 14. 11. 2019 (p. 25 – 27 of pdf, exh. C)
 - email from Mr. Rottenborn to Brown Rudnick from 29. 5. 2020 (p. 29 of pdf, exh. D)
- **17. 06. 2020 – order to withdraw Roberta Kaplan, John Quinn, Julie Fink, and Davida Brooks as counsel** ([pdf](#)) ✓
- **19. 06. 2020 – AH's memorandum in opposition to JD's motion to compel** ([pdf](#)) ✓

- requests no. 3, 8 – 11 from AH's responses and objections to JD's 2nd RFPs from 19. 6. 2020 (p. 8 – 16 of pdf)
- hearing from 18. 10. 2019 (p. 17 – 24 of pdf)
- email from Mr. Rottenborn to brown Rudnick from 19. 5. 2020 (p. 25 of pdf)
- **25. 06. 2020 – brief of Ashley Ruth Moyé as amicus curiae in support of JD's trial brief ([pdf](#))**
 - this is from that unbalanced woman who tries to profit from various celebrities
- **30. 06. 2020 – meet & confer**
- **02. 07. 2020 – JD's memorandum in opposition to AH's motion to compel ([pdf](#)) ✓**
 - AH has produced confidential materials from UK trial bundles to NGN which has read them aloud in court
- **02. 07. 2020 – AH's motion to compel RFPs and responses to ROGs and RFPs ([pdf](#))**
- **02. 07. 2020 – AH's memorandum in support of motion to compel RFPs and responses to ROGs and RFAs ([pdf](#)) ✓**
 - p. 9 – 10 from JD's responses and objections to AH's 2nd ROGs from 20. 12. 2019 (p. 9 – 14 of pdf)
 - p. 16, 21 – 22, 27 from hearing from 18. 10. 2019 (p. 15 – 19 of pdf)
 - article *Johnny Depp: Anatomy of a Fallen Movie Star* by Brent Lang for [Variety](#) from 29. 5. 2016, 20:59 (p. 20 – 22 of pdf)
 - p. 11 – 12 from JD's responses and objections to AH's 1st RFAs from 20. 12. 2019 (p. 23 – 28 of pdf)
 - p. 16 – 17 from JD's responses and objections to AH's 1st RFPs from 3. 9. 2019 (p. 28 – 32 of pdf)
 - p. 9 – 10, 13 – 17 from JD's responses and objections to AH's 2nd RFPs from 28. 10. 2019 (p. 33 – 42 of pdf)
 - p. 9 – 12, 14 – 15, 18 – 20, 22 from JD's responses and objections to AH's 1st ROGs from 28. 10. 2019 (p. 44 – 57 of pdf)
 - p. 11 – 12 from JD's responses and objections to AH's 3rd RFPs from 20. 12. 2019 (p. 58 – 62 of pdf)
- **02. 07. 2020 – AH's 4th RFPs's p. 5 is on p. 26 of pdf in AH's memorandum in support of her motion to compel production of documents in response to revised 8th RFPs from 16. 10. 2020 ([AH-MemoRevised8RFP](#)) ✓**
 - 8. – 9. everything related to the Eastern and LAPD from 21. 5. 2015 onwards
 - 10. all documents between JD and his employees or personnel during set dates
 - 11. everything related to Disney
 - 12. – 13. documents supporting loss of roles and damage as a result of the Op-Ed
 - 14. all tax returns from 2010 onwards
 - 15. everything supporting JD's reputational or financial damages
- **06. 07. 2020 – AH's friday motions day praecipe ([pdf](#))**
- **09. 07. 2020 – notice of judicial notification of UK court rulings impacting this matter ([pdf](#))**
 - approved judgement from the UK from 25. 6. 2020 (p. 5 – 14 of pdf)
 - approved judgement from the UK from 29. 6. 2020 (p. 15 – 28 of pdf)

- order from the UK from 2. 7. 2020 (p. 29 – 31 of pdf)
- **10. 07. 2020 – AH's 5th RFPs** are extracted from JD's responses and objections to AH's 5th RFPs from 3. 8. 2020 and are attachment 2 in AH's memorandum in support of motion to compel responses to her 4th and 5th RFPs from 7. 8. 2020, p. 34 – 55 of pdf ([AH-MemoResp4+5RFPs](#)) ✓
 - 1. all telephone records and texts from 2012 onwards
 - 2. – 4. all photos, receipts, payments, agreements... of the Australia house and communications with the owner
 - 5. JD and AH's shared diary
 - 6. – 7. docs related to preserving cctv footage from the Eastern from 21.–28. 5. 2016 and all related to the "fake punch"
 - 8. – 9. anything on pre-nuptial and post-nuptial agreements
 - 10. copies of JD's wills during marriage to AH
 - 11. all from Hicksville trip
 - 12. – 13. all related to Mark Hotel where JD stayed with Kate Moss in ?1994
 - 14. – 15. all communications from JD or Adam Waldman related to social media
 - 16. all related to bed repairs from PH3 in 2016
- **10. 07. 2020 – hearing's** p. 34 is on p. 108 – 110 of pdf (attachment 8) in AH's memorandum in support of motion for sanctions and motions in limine from 4. 9. 2020, p. 92 – 106 of pdf ([AH-MemoMotiLimine](#)) ✓
- **17. 07. 2020 – AH's 6th RFPs**
- **17. 07. 2020 – JD's memorandum in opposition to AH's motion to compel** ([pdf](#)) ✓
 - JD has identified 42 potential witnesses (p. 4 of pdf)
 - no other romantic partner or any other woman has ever claimed that Mr. Depp committed any violence against her (p. 5 of pdf)
- **17. 07. 2020 – JD's friday motions day response to AH's motion to compel** ([pdf](#))
- **23. 07. 2020 – JD's responses and objections to AH's 4th RFPs** are attachment 1 in AH's memorandum in support of motion to compel responses to her 4th and 5th RFPs from 7. 8. 2020, p. 10 – 31 of pdf ([AH-MemoResp4+5RFPs](#)) ✓
 - 50-51 recordings and their transcriptions are already in AH's possession or are public (p. 19 – 20 of pdf)
- **24. 07. 2020 – AH's 7th RFPs** are extracted from JD's supplemental responses and objections to AH's 7th RFPs from 30. 9. 2020 which p. 13 – 14 are attachment 1 in AH's memorandum supporting her cross motion to compel JD's production of forensic evidence from 15. 10. 2021, p. 10 – 15 of pdf ([AH-MemoCrossMot](#)) ✓
 - 8. everything related in any manner to the VA case
 - 10. documents reflecting efforts to preserve full **video footage from the Eastern from May – Aug 2016**
- **24. 07. 2020 – hearing's** p. 33 is attachment 9 in attachment 7 in AH's memorandum in support of motion to compel responses to 10th RFPs from 9. 6. 2021, p. 184 – 187 of pdf ([AH-MemoFor10RFPs](#)) ✓
- **24. 07. 2020 – foreign subpoena for Jennifer Howell** (pdf)

- 26. 07. 2020 – **Jennifer Howell's declaration** ([JeHo 20-07-26 dc](#)) is also on p. 310 – 313 of Joelle Rich's 5th UK witness statement from 14. 1. 2021 ([JoRi 21-01-14 w5](#))
 - 3. Whitney worked for me at a non-profit organization... The Art of Elysium. ... Whitney volunteered for the organization in 2014 for about 6 months. And she **worked full time as a paid employee for me in 2015-2016**, where Whitney served as Art Salon Manager/Director.
 - 4. First, Whitney came to live in the guest room of my apartment on Wilshire Boulevard, not on my floor but in my guest room. Second, when Whitney arrived, she was a mess. **Whitney told me she tried to stop her sister Amber from hitting and attacking Johnny on the stairs. Whitney said when she tried to intervene to stop Amber from going after Johnny, Amber nearly pushed Whitney down the stairs. She told me she was worried Amber "was going to kill Johnny". She told me she had endured that kind of abuse her entire life, first from her father, and then from Amber, who she said was extremely violent.** She lived with me because she did not feel she could go back to live at the Eastern... My father reminded me this morning that I told him that **"Whitney had moved in with me because she was terrified of her sister."**
 - 5. While Whitney was living with me, she told me Johnny kept checking in to see how she was doing... **Whitney said to me on multiple occasions that she did not know why he was staying in the relationship not why he was putting up with Amber's abuse.** Whitney shared with me the damage endured by both her and Amber as children and the injuries she had suffered from Amber both psychologically and physically.
 - 6. When Whitney came back from New York... she shared with me and everyone in the office that Amber freaked out, attacked Whitney and threw a wine glass full of red wine at her in the elevator.
 - 7. While Amber and Johnny were in Australia, Whitney was in the office sitting in the black and white chairs near the kitchen and loudly proclaimed, "oh my God, she has done it now. She has cut off his fucking finger." **[that must have been right after the call from AH on her probably iPad because her cell phone was recording downstairs. so AH knew full well what she had done. is there a phone record that can show dates and times for this call?]**
 - 8. Paige [Heard] shared with me... that Elon Musk had gifted a Tesla or multiple Teslas... [to Amber] ... Paige told me that Amber said Elon was controlling, abusive and that she was in a legal battle with him over the rights to embryos that they had created together. He wanted to destroy them, and Amber tried to keep them to have a baby. Paige told me Johnny was either an "angel" or a "saint" compared to Elon, and she wished that Amber and Johnny would reconcile. Paige also told me **the reason Johnny and Amber broke up was because Amber was violent and emotional** and loved Johnny so much that she could not control it. I was indeed taken aback because **this conversation occurred after the divorce** and when Hunter [Whitney's son] was only a few months old... **Whitney told me that Amber and Johnny were still in touch... [there should be some medical records of the embryo procedure, yes? AH must have her eggs extracted in order to combine them with**

Mr. Musk's swimmers to form an embryo. AH shared news of her baby on 2nd July 2021, she wrote the baby girl was born on 8th April 2021. this means that the baby was put into a surrogate mom's uterus sometime in the summer of 2020, right about when the UK trial was underway. huh, fancy that. in her Instagram post she wrote: "Four years ago, I decided I wanted to have a child." that would be in 2016. was this while she was still married to JD? perhaps, but it was not with JD she wanted to have a child with, apparently, it was with Elon Musk. it does not mean she was not planning the child while still with JD, though. she was planning to divorce JD anyway. see also *Surprise! Amber Heard secretly welcomes baby girl Oonagh via surrogate... five years after her nasty split from Johnny Depp* by Justin Enriquez for [Daily Mail](#) from 1. 7. 2021, 22:01 GMT; and *Amber Heard welcomes baby girl through surrogacy* for [ANI](#) from 2. 7. 2021, 10:01 IST, both with her Instagram post. when was Ms. Howell visiting Paige Heard? after divorce was filed or after it was finalized? I kinda find it hard to believe that JD and AH would still be in touch in 2017, so I am inclined to think that Ms. Howell was visiting Ms. Henriquez some time in 2016 after the divorce was filed, or perhaps after the divorce settlement was agreed upon on 16th August 2016. perhaps she is referring to the 'mediation' attempt in San Francisco in July 2016. I couldn't find a more precise time of when Mr. Musk gave AH the tesla. it was not mentioned in *Elon Musk Requested to Meet Amber Heard Via Email Years Ago* by Tatiana Siegel for [The Hollywood Reporter](#) from 24. 8. 2016, 11:00, or in *Elon Musk Courted Amber Heard for a Friendship Years Ago, According to Email Exchanges* by Kendall Fishes for [E!News](#) from 25. 8. 2016, 17:47, although there are some interesting bits about their relationship. AH and Mr. Musk made their relationship public in April 2017: *Amber Heard goes public with Elon Musk* for [AP News](#) from 24. 4. 2017, but they were seen together very soon after she filed for divorce with JD: *Are Amber Heard and Elon Musk Hanging Out Amid Their Pending Divorces? Both Spotted at Same Miami Hotel* by Lindsay Kimble for [People](#) from 22. 7. 2016, 13:45. they split in August 2017, according to *Amber Heard parts ways with Tesla mogul Elon Musk* for [ArabNews](#) from 11. 8. 2017.]

- 9. When Amber got into legal trouble regarding smuggling the dogs into Australia, she asked me to write her a character reference about her charity work, and I did to. We had given her a humanitarian award. She volunteered for the charity... [eg. *Amber Heard honored at Art of Elysium Heaven Gala* by Ellen Olivier for [Los Angeles Times](#) from 11. 1. 2015, 13:01 PT]
- 11. I learned that none of it [the divorce settlement] would be directed to The Art of Elysium, which Amber had been closely associated for years. ... I asked Amber's publicist why, when she and Amber had been so eager to use our name in the press during the divorce,... [eg. *Amber Heard will donate her \$7 million divorce settlement from Johnny Depp to charity* by Josh Dickey for [Mashable](#) from 18. 8. 2016; *Amber Heard Gives Her \$7 Million Divorce Settlement To Charity* by Claudia Rosenbaum for [BuzzFeedNews](#) from 19. 8. 2016, 1:43; *Amber To Donate Entire Settlement* by Scarlett Conlon for [Vogue](#) from 19. 8. 2016] Amber's publicist told me that they were more prominent charities with a more significant press reach

and got international press. Then, months later, a \$250,000 donation came into our organization from an anonymous donor "on behalf of Amber Heard". **The funds did not come from Amber.** I believed this donation came from Elon [Musk].

- 12. Years later, on July 24 2020, I received two subpoenas from Johnny's attorney... The following day, I spoke with Johnny's attorney Adam Waldman for the first time.
- 13. I shared the names of The Art of Elysium staff who worked during the same time as Whitney who also heard there things and more and willingly gave access to my e-mails, texts to confirm dates and timeline of all stated.
- **28. 07. 2020 – foreign subpoena for Jennifer Howell** ([pdf](#))
- **03. 08. 2020 – JD's responses and objections to AH's 5th RFPs** are attachment 2 in AH's memorandum in support of motion to compel responses to her 4th and 5th RFPs from 7. 8. 2020, p. 34 – 55 of pdf ([AH-MemoResp4+5RFPs](#)) ✓
- **07. 08. 2020 – JD's responses and objections to AH's 6th RFPs** are attachment 7 in AH's memorandum in support of her motion to compel production of documents in response to her 4th, 5th, 6th and 7th RFPs from 4. 9. 2020, p. 92 – 119 of pdf ([AH-MemoFor4+5+6+7RFPs](#)) ✓
- **07. 08. 2020 – AH's motion to compel praecipe** ([pdf](#))
- **07. 08. 2020 – AH's motion to compel** ([pdf](#))
- **07. 08. 2020 – AH's memorandum in support of motion to compel responses to her 4th and 5th RFPs** ([AH-MemoResp4+5RFPs](#)) ✓
 - **JD has over 320 audio and video recordings of which 50-51 include AH, they are 4 – 8 years ago;** AH's RFPs 1 and 2 (p. 3 of pdf)
 - **apparently there are videos of before and after the 'not-a-hostage' situation in Australia** (p. 5 of pdf)
 - when JD trashed the NYC hotel room when he was with Kate Moss, the damage was \$10,000 and he claims he only broke a lamp and pushed a sofa across the room (p. 6 of pdf)
 - JD's responses and objections to AH's 4th RFPs from 23. 7. 2020 (p. 10 – 31 of pdf, att. 1)
 - JD's responses and objections to AH's 5th RFPs from 3. 8. 2020 (p. 34 – 55 of pdf, att. 2)
- **10. 08. 2020 – order that AH should execute HIPAA waiver** ([pdf](#)) ✓
- **10. 08. 2020 – order granting AH all documents from the UK trial and all press-related documents, and documents relating to the finger injury** ([pdf](#)) ✓
- **10. 08. 2020 – order granting AH supplemental answers for various RFPs** ([pdf](#)) ✓
- **10. 08. 2020 – AH's answer and grounds of defense** ([pdf](#))
- **10. 08. 2020 – AH's amended answer and grounds of defense** ([AH-AmendAnswer](#)) is also attachment 1 in AH's memorandum in support of plea in bar from 13. 4. 2021, p. 10 – 42 of pdf ([AH-MemoPleaBar](#)) ✓
 - 15. [AH] further denies that she injured Plaintiff's middle finger on his right hand... [AH] denies that Mr. Musk visited Plaintiff's penthouse at any time in March 2015...

- 16. [AH] denies that she or any of her friends provided false testimony in support of the restraining order she received... [AH] specifically denies that there was any hoax or any scheme to lure Plaintiff to the penthouse...
- 18. [AH] denies that she withdrew her allegations relating to Plaintiff's domestic violence and abuse... ...admits that she voluntarily dismissed her petition for domestic violence restraining order as part of the January 13, 2017 stipulated judgement of dissolution of marriage... [wasn't that already in the DPM from 15./16. 8. 2016?]
- 20. [AH] denies that she defamed Plaintiff or made statements or implications in the op-ed...
- 37. ...Mr. Wright asked his friend Ms. Shapiro to call 911...
- 10. 08. 2020 – AH's counterclaim AH's counterclaim ([AH-Counter1](#)) ✓
 - 1. & 17. reference to [texts](#) between Paul Bettany and JD from 2013
 - 4. Ms. Heard's Counterclaims arise out of the and relate to the same transactions or occurrences upon which the Depp's claim is based.
 - 6. reference to two change.org petitions: one to remove Ms. Heard as an actress in the *Aquaman* movie franchise [[this petition on change.org has been initiated by Jeanne Larson; there is no date when the petition was started](#)], and one to remove her as a spokeswoman for L'Oréal [[this petition has been initiated by Hillary Deanna; again, no start date](#)].
 - 7. reference to JD's text "want[ed] her replaced on that WB film"
 - 10. – 15 deals with bots, accounts, twitter
 - 12. reference to "[ifod.net](#)" account and "my grindelwald" account
 - 19. reference to [text](#) from JD to Christian Carino from 16. 8. 2016
 - 23. reference to text from JD from 2018 but before the Op-Ed: "But, when the boom hets lowered on Scam-ber(which is VERY soon), the world will receive the proper image of who i am and what i have had to stay silent about for 3 fucking years!!!!!! ... the only thing I feel for her now, at best, is pure disgust and hatred!! She's such a predictable, see through, disposable, sick fuckin' whore!! Truly a pig to me now!!! No better than any junkie hooker with bad intentions..."
 - 32. reference to JD's first [post](#) on instagram from 16. 4. 2020 [[he joined instagram on 16. 4. 2020, not on 17. 4., as stated in the counterclaim](#)]
 - 48. reference to Adam Waldman's tweet from 22. 7. 2020 with a [photo](#) from 23. 3. 2013
 - 49. reference to Adam Waldman's tweet from 26. 7. 2020 with a [photo](#) from 24. 3. 2013
 - article *Johnny Depp will not be buried* by Jonathan Heaf for [British GQ](#) from 11. 2018 (p. 23 – 38 of pdf, exh. A)
 - article *Warnes Bros. 'freaking out' Depp suit will harm Harry Potter films* by Emily Smith for [Page Six](#) from 12. 4. 2019, 18:42 (p. 39 – 40 of pdf, exh. B)
 - article *Amber Heard Accuses Johnny Depp of Lying About Police Calls On Night of Massive Fight* by Mike Walters for [The Blast](#) from 1. 6. 2019, 22:11 (p. 42 – 46 of pdf, exh. C)

- article *Surveillance Video Shows James Franco With Amber Heard One Day After Blowout Fight With Johnny Depp* by Mike Walters for [The Blast](#) from 2. 7. 2019. 10:06 (p. 47 – 53 of pdf, Exh. D)
- article *Why Johnny Depp Wants James Franco to Testify in His Defamation Suit Against Amber Heard* by Alexia Fernández for from [People](#) 3. 7. 2019, 12:33 (p. 54 – 55 of pdf, exh. E)
- article *Amber Heard's 'sexual violence' evidence against Johnny Depp will be kept secret in his libel claim against The Sun despite him arguing claims should be made public* by Ross Ibbetson for [Mail Online](#) from 8. 4. 2020, 21:26 (p. 57 – 68 of pdf, exh. F)
- article *'I need to report an assault'. Listen to 911 call made the night Johnny Depp and Amber Heard had blowout fight that ended their toxic 18-month marriage – but both claim tape backs up their version of events* by Ben Ashford for [Daily Mail](#) from 27. 4. 2020, 18:45 (p. 69 – 81 of pdf, exh. G)
- article *MeToo activist Amanda de Cadenet drops support for close friend Amber Heard and will no longer testify after listening to her 'verbally abusing' Johnny Depp in bombshell tapes, as she feels 'used and misled' by actress* by Ben Ashford for [Daily Mail](#) from 24. 6. 2020, 22:28 (p. 83 – 93 of pdf, exh. H)
- **10. 08. 2020 – foreign subpoena for ACLU** ([pdf](#))
- **10. 08. 2020 – foreign subpoena for The Art of Elysium** ([pdf](#))
- **10. 08. 2020 – foreign subpoena for Jennifer Howell** ([pdf](#))
- **10. 08. 2020 – foreign subpoena for LAPD** ([pdf](#))
- **10. 08. 2020 – foreign subpoena for Twitter** ([pdf](#))
- **12. 08. 2020 – AH's improperly filed motion**
- **13. 08. 2020 – foreign subpoena for Elon Musk** ([pdf](#))
- **14. 08. 2020 – foreign subpoena for Elon Musk** ([pdf](#))
- **14. 08. 2020 – AH's notice of deposition by video for Adam Waldman** is on p. 9 – 10 of pdf in AH's memorandum in opposition to JD's motion to quash and for a protective order from 4. 1. 2021 ([AH-MemoQuashProtectOrder](#)) ✓
- **14. 08. 2020 – JD's response to AH's motion to compel praecipe** ([pdf](#))
- **14. 08. 2020 – JD's memorandum in response and opposition to AH's motion to compel responses to her 4th and 5th RFPs** ([pdf](#)) ✓
 - the hotel incident when JD was with Kate Moss was in 1994 (p. 5 of pdf)
 - emails between Mr. Chew to Mr. Nadelhaft from 5. 8. 2020 (p. 9 – 14 of pdf, exh. A) [did anyone notice she is called Ms. Depp once in Mr. Nadelhaft email?]
 - email from Mr. Chew to Ms. Bredehoft from 10. 8. 2020 (p. 16 – 17 of pdf, exh. B)
- **14. 08. 2020 – JD's supplemental responses and objections to AH's 1st ROG's** are attachment 4 in AH's memorandum in support of motion for sanctions and motions in limine from 4. 9. 2020, p. 44 – 58 of pdf ([AH-MemoMotiLimine](#)), and p. 10 – 12 are on p. 222 – 230 of pdf in in AH's memorandum in support of motion to compel responses to 11th and 12th RFPs from 24. 11. 2021 ([AH-MemoFor11+12](#)) ✓

- **14. 08. 2020 – JD's 3rd RFPs** are exhibit 5 ([exh. 5](#)) in affirmation of Jessica Meyers in support of JD's petition to compel response to out-of-state subpoenas for ACLU from 10. 5. 2021 ([JeMe 21-05-10 aff](#)) ✓
 - 1. – 43. practically everything from AH's usual suspects and relations plus new persons [[who are Bonnie Jacobs, Laurel Anderson, Amy Banks, Joseph Sugerman, Leonard Damian?](#)] relating to incidents, divorce, UK proceedings, NGN
 - 44. – 47. documents related to AH's purported donation of any divorce settlement payments she received from JD
 - 53. – 54. documents related to news media
- **17. 08. 2020 – JD's responses and objections to AH's 7th RFPs** are attachment 7 in AH's memorandum in support of her motion to compel production of documents in response to her 4th, 5th, 6th and 7th RFPs from 4. 9. 2020, p. 120 – 140 of pdf ([AH-MemoFor4+5+6+7RFPs](#)) ✓
- **18. 08. 2020 – Adam Waldman's deposition** (AdWa 20-08-18 dp)
- **18. 08. 2020 – foreign subpoena for Robin Baum** ([pdf](#))
- **18. 08. 2020 – foreign subpoena for the Corporate designee of Eastern Columbia Building** ([pdf](#), [pdf](#))
- **18. 08. 2020 – foreign subpoena for Custodian Records of The Mandel Company** ([pdf](#))
- **18. 08. 2020 – foreign subpoena for Trinity Esparza** ([pdf](#))
- **18. 08. 2020 – foreign subpoena for Cornelius Harrell** ([pdf](#))
- **18. 08. 2020 – foreign subpoena for Joel Mandel** ([pdf](#))
- **18. 08. 2020 – foreign subpoena for Alejandro Romero** ([pdf](#))
- **18. 08. 2020 – foreign subpoena for Laura Wasser** ([pdf](#))
- **18. 08. 2020 – foreign subpoena for Edward White** ([pdf](#))
- **19. 08. 2020 – foreign subpoena for Brandon Patterson** ([pdf](#))
- **19. 08. 2020 – foreign subpoena for Christian Carino** ([pdf](#))
- **19. 08. 2020 – foreign subpoena for Christi Dembrowski** ([pdf](#))
- **19. 08. 2020 – foreign subpoena for Laura Divenere** ([pdf](#))
- **19. 08. 2020 – foreign subpoena for officer Tyler Hadden** ([pdf](#))
- **19. 08. 2020 – foreign subpoena for Tracey Jacobs** ([pdf](#))
- **19. 08. 2020 – foreign subpoena for LAPD Corporate Designee** ([pdf](#))
- **19. 08. 2020 – foreign subpoena for officer Melissa Saenz** ([pdf](#))
- **19. 08. 2020 – foreign subpoena for Wasser, Cooperman & Mandles** ([pdf](#))
- **19. 08. 2020 – foreign subpoena for Jack Wigham** ([pdf](#))
- **19. 08. 2020 – AH's 8th RFPs's no. 6 – 9** are extracted from JD's responses and objections to AH's 8th RFPs from 9. 9. 2020 which are on p. 9 – 14 of pdf in AH's memorandum in support of her motion to compel production of documents in response to revised 8th RFPs from 16. 10. 2020 ([AH-MemoRevised8RFP](#)) ✓
 - 6. – 7. docs from the other litigations reflecting impact on JD's reputation and career, these litigations are "security guard case", "Rocky Brooks case", "attorney case", and "Mandel case"
 - 8. everything between JD and Disney from 1. 1. 2015 onwards
 - 9. everything related to JD's insurance on any project from 1. 1. 2012 onwards

- **20. 08. 2020 – AH's expedited request – 9th RFPs** is part of attachment 6 in AH's opposition to JD's motion for continuance from 4. 9. 2020, p. 38 – 43 ([AH-
OppMotContin](#))
- **21. 08. 2020 – JD's motion for continuance praecipe** ([pdf](#))
- **21. 08. 2020 – JD's motion for continuance** ([pdf](#))
- **21. 08. 2020 – JD's memorandum in support of motion for continuance** ([JD-
MemoConti](#), [pdf2](#)) ✓
 - regarding JD's then-still active filming schedule for Fantastic Beasts 3
 - letter from Warner Bros. Pictures to Mr. White regarding Fantastic Beasts 3's filming schedule from 19. 8. 2020 (p. 6 of pdf)
 - order granting JD's motion for continuance from 9. 2020 (p. 7 of pdf)
- **21. 08. 2020 – AH's counterclaim counterclaim** ([AH-Counter2](#))
 - email from Ms. Bredehoft to Mr. Frey regarding counterclaim from 10. 8. 2020 (p. 22 of pdf)
 - article *Johnny Depp will not be buried* by Jonathan Heaf for [British GQ](#) from 11. 2018 (p. 23 – 38 of pdf)
 - article *Warnes Bros. 'freaking out' Depp suit will harm Harry Potter films* by Emily Smith for [Page Six](#) from 12. 4. 2019, 18:42 (p. 39 – 40 of pdf)
 - article *Amber Heard Accuses Johnny Depp of Lying About Police Calls On Night of Massive Fight* by Mike Walters for [The Blast](#) from 1. 6. 2019, 22:11 (p. 42 – 53 of pdf)
 - article *Why Johnny Depp Wants James Franco to Testify in His Defamation Suit Against Amber Heard* by Alexia Fernández for [People](#) 3. 7. 2019, 12:33 (p. 54 – 56 of pdf)
 - article *Amber Heard's 'sexual violence' evidence against Johnny Depp will be kept sesret in his libel claim against The Sun despite him arguing claims should be made public* by Ross Ibbetson for [Mail Online](#) from 8. 4. 2020, 21:26 (p. 57 – 68 of pdf)
 - article *'I need to report an assault'. Listen to 911 call made the night Johnny Depp and Amber Heard had blowout fight that ended their toxic 18-month marriage – but both claim tape backs up their version of events* by Ben Ashford for [Mail Online](#) from 27. 4. 2020, 18:45 (p. 69 – 81 of pdf)
 - article *MeToo activist Amanda de Cadenet drops support for close friend Amber Heard and will no longer testify after listening to her 'verbally abusing' Johnny Depp in bombshell tapes, as she feels 'used and misled' by actress* by Ben Ashford for [Daily Mail](#) from 24. 6. 2020, 22:28 (p. 83 – 93 of pdf)
- **21. 08. 2020 – JD's supplemental responses and objections to AH's 1st RFAs** are attachment 5 in AH's memorandum in support of motion for sanctions and motions in limine from 4. 9. 2020, p. 92 – 106 of pdf ([AH-MemoMotiLimine](#)), and its p. 8 – 9 are on p. 256 – 260 of pdf in AH's memorandum in support of motion to compel responses to 11th and 12th RFPs from 24. 11. 2021 ([AH-MemoFor11+12](#)) ✓
- **21. 08. 2020 – JD's 2nd supplemental responses and objections to AH's 1st ROG's** are attachment 5 in AH's memorandum in support of motion for sanctions and motions in limine from 4. 9. 2020, p. 60 – 77 of pdf ([AH-MemoMotiLimine](#)) ✓

- **21. 08. 2020 – JD's supplemental responses and objections to AH's 2st ROGs's** are attachment 6 in AH's memorandum in support of motion for sanctions and motions in limine from 4. 9. 2020, p. 79 – 91 of pdf ([AH-MemoMotiLimine](#)) ✓
- **21. 08. 2020 – hearing**
- **25. 08. 2020 – foreign subpoena for Natasha Brooks** ([pdf](#))
- **28. 08. 2020 – meet & confer**
- **31. 08. 2020 – JD's demurrer and plea in bar to AH's Aug 10 counterclaims** ([pdf](#))
- **31. 08. 2020 – JD's motion for breafing schedule praecipe** ([pdf](#))
- **31. 08. 2020 – JD's motion for leave to file extanded brief and for briefing schedule on demurrer and plea in bar** ([pdf](#))
- **31. 08. 2020 – JD's memorandum in support of motion to file extended brief and for briefing schedule** ([pdf](#)) ✓

- **01. 09. 2020 – meet & confer**
- **04. 09. 2020 – AH's opposition to JD's motion for continuance** ([AH-OppContinu](#), [pdf2](#)) ✓
 - notice of deposition by video of JD from 7. 8. 2020 (p. 11 – 13 of pdf, att. 1)
 - email from Ms. Bredehoft to Brown Rudnick regarding depositions from 7. 8. 2020 (p. 14 – 16 of pdf, att. 2)
 - notice of deposition by video of JD from 7. 8. 2020 (p. 16 – 17 of pdf)
 - emails between Ms. Bredehoft and Mr. Chew from 17. – 19. 8. 2020 (p. 21 – 23 of pdf)
 - emails between Ms. Bredehoft and Mr. Chew from 13 – 20. 8. 2020 (p. 25 – 29 of pdf)
 - calendar control [order](#) from 18. 5. 2020 (p. 31 of pdf)
 - emails between Ms. Bredehoft and Mr. Chew from 13. – 20. 8. 2020 (p. 33 – 37 of pdf)
 - AH's expedited request – 9th RFPs to JD from 20. 8. 2020 (p. 38 – 50 of pdf) – twice
 - emails from Ms. Bredehoft to Mr. Eckerle regarding JD's depositions and filming schedule from 24. 8. 2020 (p. 52 – 53 of pdf)
 - email from Mr. Eckerle to Mr. White regarding JD's filming schedule from 19. 8. 2020 (p. 54 of pdf)
 - notice of deposition by video of JD from 8. 7. 2020 (p. 55 – 57 of pdf)
 - calendar control [order](#) from 18. 5. 2020 (p. 58 of pdf)
 - emails between Ms. Bredehoft and Mr. Chew from 26. – 27. 8. 2020 (p. 60 – 62 of pdf) – **50-51 tapes in JD's possession are mentioned here**
 - transcript of hearing from 21. 8. 2020 (p. 64 – 67 of pdf)
 - letter to Mr. Frey from 4. 9. 2020 (p. 68 of pdf)
- **04. 09. 2020 – AH's response to JD's motion for continuance praecipe** ([pdf](#))
- **04. 09. 2020 – AH's responses and objections to JD's 3rd RFPs** are exhibit 6 ([exh. 6](#)) affirmation of Jessica Meyers in support of JD's petition to compel response to out-of-state subpoenas for ACLU from 10. 5. 2021 ([JeMe 21-05-10 aff](#)), and p. 1 and 28 – 29 attachment 4 in AH's opposition to JD's motion to compel production of original devices

and operating system drives and cloud backups of these original devices as requested in JD's 7th RFPs from 22. 10. 2021, p. 32 – 35 of pdf ([AHOppForenEvid](#)) ✓

- 41. – 43. everything between AH and Rami Sarabi, Bianca Butti, or any other person related to JD
- 44. everything related to AH and her donations of divorce settlement payments
- **04. 09. 2020 – AH's motion to compel production of documents** ([pdf](#))
- **04. 09. 2020 – AH's memorandum in support of her motion to compel production of documents in response to her 4th, 5th, 6th and 7th RFPs** ([AH-MemoFor4+5+6+7RFPs](#)) ✓
 - A. ...these "50-51" recordings were made 4 to 8 years ago and should have been produced long-ago. Mr. Depp agreed to produce responsive, non-privileged documents, but has stated that he intends to "review and withhold" many of these recordings on Fifth Amendment grounds, because he made these recordings without Ms. Heard's consent...
 - JD's responses and objections to AH's 4th RFPs from 23. 7. 2020 (p. 10 – 32 of pdf, att. 1)
 - JD's responses and objections to AH's 5th RFPs from 3. 8. 2020 (p. 34 – 57 of pdf, att. 2)
 - proposed consent order respecting JD's responses to 4th, 5th, 6th and 7th RFPs (p. 59 – 62 of pdf, att. 3)
 - [order](#) from 10. 8. 2020 (p. 64 – 65 of pdf, att. 4)
 - [order](#) from 10. 8. 2020 (p. 67 – 68 of pdf, att. 5)
 - VA [declaration](#) of Johnny Depp from 5. 2019 (p. 70 – 91 of pdf, att. 6)
 - JD's responses and objections to AH's 6th RFPs from 7. 8. 2020 (p. 92 – 119 of pdf, att. 7)
 - JD's responses and objections to AH's 7th RFPs from 17. 8. 2020 (p. 120 – 140 of pdf)
- **04. 09. 2020 – AH's motion for sanctions and motions in limine praecipe** ([pdf](#))
- **04. 09. 2020 – AH's motion for sanctions and motions in limine** ([pdf](#))
 - to exclude evidence concerning the amount of her charitable donations
- **04. 09. 2020 – AH's memorandum in support of motion for sanctions and motions in limine** ([AH-MemoMotiLimine](#)) ✓
 - IV. AH is trying to get out of giving evidence regarding charity donations
 - [order](#) from 10. 8. 2020 (p. 10 – 11 of pdf, att. 1)
 - [order](#) from 10. 8. 2020 (p. 13 – 14 of pdf, att. 2)
 - JD's responses and objections to AH's 1st ROGs from 28. 10. 2019 (p. 16 – 42 of pdf, att. 3)
 - JD's supplemental responses and objections to AH's 1st ROGs from 14. 8. 2020 (p. 44 – 58 of pdf, att. 4)
 - JD's 2nd supplemental responses and objections to AH's 1st ROGs from 21. 8. 2020 (p. 60 – 77 of pdf, att. 5)
 - JD's supplemental responses and objections to AH's 2nd ROGs from 21. 8. 2020 (p. 79 – 91 of pdf, att. 6)
 - JD's supplemental responses and objections to AH's 1st RFAs from 21. 8. 2020 (p. 92 – 106 of pdf, att. 7)

- p. 34 from hearing from 10. 7. 2020 (p. 108 – 110 of pdf, att. 8)
- JD's responses and objections to AH's 1st RFPs from 3. 9. 2019 (p. 111 – 151 of pdf, att. 9)
- crimes act 1914 sect 19B (p. 153 – 154 of pdf, att. 11 – sic!)
- letter regarding three subpoenas (to ACLU) from 4. 8. 2020 & both subpoenas to ACLU (p. 156 – 221 of pdf, att. 12)
- letter regarding subpoena to CHLA from 29. 5. 2020 & subpoena to CHLA (p. 223 – 247 of pdf, att. 13)
- Adam Waldman's tweet from 7. 8. 2020 & VA [declaration](#) of Jennifer Howell from 26. 7. 2020 (p. 249 – 253 of pdf, att. 14)
- **09. 09. 2020 – JD's praecipe** ([pdf](#)) ✓
 - email from Warner Bros to Ms. Bredehoft and Mr. Chew regarding JD's filming schedule from 8. 9. 2020 (p. 3 of pdf)
- **09. 09. 2020 – JD's responses and objections to AH's 8th RFPs** are attachment 1 in AH's memorandum in support of motion to compel and for relief based on JD's failure to timely produce discovery before the deposition of Tracey Jacobs from 9. 6. 2021, p. 10 – 14 of pdf ([AH-Relief](#)) ✓
- **11. 09. 2020 – JD's opposition to AH's motion to compel praecipe** ([pdf](#))
- **11. 09. 2020 – JD's opposition to AH's motion to compel production of documents in response to 4th, 5th, 6th and 7th RFPs** ([pdf](#)) ✓
 - JD produced 12 recordings and transcripts (p. 2 of pdf)
- **11. 09. 2020 – Christy Dembrowski's deposition** (ChDe 20-09-11 dp)
- **14. 09. 2020 – agreed order granting JD's briefing schedule and opening brief for demurrer and plea in bar** ([pdf](#)) ✓
- **14. 09. 2020 – order** ([pdf](#)) ✓
- **14. 09. 2020 – consent order that JD shall produce all non-privileged documents to certain RFPs** ([pdf](#)) ✓
- **14. 09. 2020 – JD's motion to sustain demurrer and plea in bar praecipe** ([pdf](#))
- **14. 09. 2020 – JD's motion to sustain demurrer and plea in bar** ([pdf](#))
- **14. 09. 2020 – JD's memorandum in support of motion to sustain demurrer and plea in bar** ([pdf](#)) ✓
- **14. 09. 2020 – LAPD Corporate Designee's deposition** (LAPDcd 20-09-14 dp)
- **15. 09. 2020 – officer Melissa Saenz's deposition** (MeSa 20-09-15 dp)
- **15. 09. 2020 – officer Tyler Hadden's deposition** (TyHa 20-09-15 dp)
- **15. 09. 2020 – meet & confer**
- **16. 09. 2020 – Ben King's deposition** (BeKi 20-09-16 dp)
- **17. 09. 2020 – Robin Baum's deposition** (RoBa 20-09-17 dp)
- **18. 09. 2020 – JD's opposition to AH's motion for sanctions and motions in limine praecipe** ([pdf](#))
- **18. 09. 2020 – JD's opposition to AH's motion for sanctions and motions in limine** ([pdf](#)) ✓
- **18. 09. 2020 – Malcolm Connolly's deposition** (MaCo 20-09-18 dp)
- **18. 09. 2020 – Nathan Holmes' deposition** (NaHo 20-09-18 dp)

- **18. 09. 2020 – hearing's** p. 35 is on p. 28 of AH's memorandum in support of her motion to compel production of documents in response to revised 8th RFPs from 16. 10. 2020 ([AH-MemoRevised8RFP](#)) and p. 26, 35, 36, 38 are attachment 3 in AH's memorandum in opposition to JD's motion to compel AH's further responses without objections and production of documents in response to 4th RFPs from 23. 4. 021, p. 106 – 112 of pdf ([AH-OppFurterResponses+4RFP](#)) ✓
 - JD shall produce gross tax income but without the supporting documents
- **21. 09. 2020 – Trinity Esparza's deposition** (TrEs 20-09-21 dp)
- **21. 09. 2020 – Cornelius Harrell's deposition** (CoHa 20-09-21 dp)
- **22. 09. 2020 – Joel Mandel's deposition** (JoMa 20-09-22 dp)
- **23. 09. 2020 – Laura Wasser's deposition** (LaWa 20-09-23 dp)
- **23. 09. 2020 – AH's motion to compel praecipe** ([pdf](#))
- **23. 09. 2020 – AH's motion to compel** ([pdf](#))
- **23. 09. 2020 – AH's memorandum in support of motion to compel deposition of JD, production of documents in response to AH's 9th RFPs** ([AH-MemoJDsDeposit+9RFP](#)) ✓
 - notice of deposition by video for JD from 7. 8. 2020 (p. 10 – 12 of pdf, att. 1)
 - email from Ms. Bredehoft to Brown Rudnick with deposition dates from 7. 8. 2020 (p. 13 – 16 of pdf, att. 2)
 - notice of deposition by video for JD from 7. 8. 2020 & subpoena for Elon Musk from 13. 8. 2020 (p. 17 – 49 of pdf, att. 3)
 - emails between Ms. Bredehoft and Mr. Chew between 13. and 20. 8. 2020 (p. 51 – 58 of pdf, att. 4)
 - email from Ms. Bredehoft to Mr. Eckerle from 24. 8. 2020 & letter from Mr. Er. Eckerle to Mr. White from 19. 8. 2020 & notice of deposition by video for JD from 7. 8. 2020 & calendar control [order](#) from 18. 5. 2020 (p. 60 – 66 of pdf, att. 6)
 - emails between Ms. Bredehoft and Mr. Chew between 13. and 20. 8. 2020 & AH's expedient request for 9th RFPs from 20. 8. 2020 (p. 68 – 83 of pdf, att. 7)
 - JD's responses and objections to AH's 9th RFPs from 9. 9. 2020 (p. 85 – 99 of pdf, att. 9)
 - emails between Ms. Bredehoft and Mr. Chew from 26. and 27. 8. 2020 (p. 101 – 103 of pdf, att. 10)
 - letter from Mr. Smith to Ms. Bredehoft and Mr. Chew from 8. 9. 2020 (p. 105 of pdf, att. 11)
 - email from Ms. Bredehoft to Mr. Smith from 9. 9. 2020 (p. 107 of pdf, att. 12)
 - article *Johnny Depp, Matt Dillon, Viggo Mortensen and Gina Gershon will attend San Sebastian Festival's 68th edition* for [SFIFF](#) from 17. 9. 2020 (p. 109 – 112 of pdf, att. 13)
 - article *Crock of Gold: A Few Rounds with Shane McGowan* by Julien Temple for [ZFF](#) & article *Zurich Film Festival reveals 2020 line-up; Johnny Depp to attend* by Michael Rosser for [Screen Daily](#) from 10. 9. 2020 (p. 114 – 121 of pdf, att. 14)
 - notice New coronavirus: Mandatory quarantine for persons arriving in Switzerland & Coronavirus (covid-19): travel corridors (p. 123 – 138 of pdf, att. 15)
- **24. 09. 2020 – Samantha McMillen's deposition** (SaMcM 20-09-24 dp)

- 24. 09. 2020 – AH's motion for sanctions praecipe ([pdf](#))
- 24. 09. 2020 – AH's motion for sanctions ([pdf](#))
- 24. 09. 2020 – AH's memorandum in support of motion for sanctions against Adam Waldman ([AH-MemoAdamWald](#), [pdf2](#)) ✓
 - reference to article *Amber Heard's father accused to threatening to shoot Johnny Depp* by Mike Walters for [The Blast](#) from 30. 11. 2019, 16:42 (p. 3)
 - reference to article *Johnny Depp's ex-wife Vanessa Paradis calls Amber Heard's violent allegations 'False Facts'* by Mike Walters for [The Blast](#) from 16. 3. 2020, 9:20 (p. 3)
 - reference to @ThatBrianFella's tweet with a [video](#) *New evidence!!* with declarations from 6. 4. 2020 (p. 3 – 4)
 - reference to @ThatBrianFella's tweet with medical records from Australia (p. 4) [perhaps [this](#) one or [this](#) one?]
 - reference to @ThatBrianFella's tweet with AH's email from 14. 12. 2019 (p. 4)
 - reference to article with texts from AH's parents to JD for The Blast (p. 4) [*Johnny Depp Text Messages With Amber Heard's Parents Revelaed: 'I DID NOT Throw A Phone At Her!'*] by Mike Walters for [The Blast](#) from 19. 12. 2019, 11:25]
 - reference to article about James Franco's private deposition for The Blast (p. 4) [*James Franco Wants His Involvement In Johnny Depp & Amber Heard Case Kept Private*] by Mike Walters for [The Blast](#) from 25. 1. 2020, 19:40]
 - reference to *'I can't promise I won't get physical again, I get so mad I lose it.'* Listen as Amber Heard admits to 'hitting' ex-husband Johnny Depp and pelting him with pots, pans and vases in explosive audio confession by Ben Ashford for [Daily Mail](#) where one of the tapes has been leaked, from 31. 1. 2020, 19:25 GMT (p. 4)
 - reference to *'See how many people believe you.'* Listen as Amber Heard scoffs at Johnny Depp for claiming he's a domestic violence victim, suggesting court would take her side because she's a slender woman in explosive audio by Ben Ashford for [Daily Mail](#) with another recording from 5. 2. 2020, 19:35 GMT (p. 4)
 - confidential email from ? and email from Ms. Ashford to Mr. Reed regarding Josh Drew and the 'threeway affair' from 10. 6. 2020 (p. 10 – 11 of pdf, exh. 1)
 - email from Mr. Rottenborn to Mr. Chew regarding the leak of Josh Drew's confidential deposition from ? (p. 14 of pdf, exh. 2)
 - email from Ms. Watts to Ms. Gottlieb regarding leaked texts between Mr. Musk and Ms. Heard from 22. 5. 2016, from 23. 6. 2020 (p. 16 – 17 of pdf, exh. 3)
 - article *Amber Heard called Elon Musk her 'Rocketman' in texts while texting the SpaceX chief BEFORE she filed for divorce from Johnny Depp, new messages reveal* by Tim Stickings for [Daily Mail](#) from 25. 6. 2020, 8:55 GMT (p. 18 – 21 of pdf, exh. 3)
 - tweet from Adam Waldman about 'Rocketman' and texts between him and AH from 22. 5. 2016, some confidential, from 24. 6. 2020 (p. 22 – 23 of pdf, exh. 3)
 - Adam Waldman's statements/tweets leaking case materials (p. 25 – 40 of pdf, exh. 4), some copies fairly illegible
 - excerpt from Laura Divenere's [declaration](#) and The Sun having THR illegal tape, from 1. 7. 2020 (p. 26 of pdf)

- Whitney Henriquez' texts to Jennifer Howell to stop her from testifying, from 6. 8. 2020 (p. 27 – 28 of pdf) [I found [text](#) from 28. 6. 2020 and [text](#) and [texts](#) from 26. 7. 2020]
- Jennifer Howell's response [text](#) to Whitney Henriquez' texts from 26. 7. 2020, from 6. 8. 2020 (p. 29 of pdf)
- leak to The Sun on 26. 7. , from 6. 8. 2020 (p. 30 of pdf)
- first communication with Laura Divenere and The Sun leak on 21./22. 6. 2019, from ? (p. 31 – 32 of pdf)
- email/letter from Jennifer Howell to Whitney Henriquez from 25. 7. 2020 ([part1](#), [part2](#), [part3](#)), from 26. 8. 2020 (p. 33 – 26 of pdf) [Ms. Henriquez response was published in *Amber Hear'd sister thought she 'was going to kill' Johnny Depp, claims witness* by Tom Bryant for [The Mirror](#) from 28. 7. 2020, 21:30, to which Ms. Howell repoded by an [email](#) to Ms. Henriquez from 28. 7. 2020, 8:01]
- twitter asked by Ms. Bredehoft fot Mr. Waldman's account information, from 25. 8. 2020 (p. 37 of pdf)
- when Laura Divenere was with AH "post-hoax", and Ms. Divenere's admittance she returned early from Africa, from 18. 9. 2020 (p. 38 – 40 of pdf)
- Adam Waldman's statements/tweets disrespectful of judicial process (p. 43 – 59 of pdf, exh. 5), some copies fairly illegible
 - AH's claim about the SMEG fridge from Mar 2013 and the [order/order](#) of purchase for the fridge from 19. 10. 2014, from 22. 7. 2020 (p. 43 – 44 of pdf)
 - The Sun asking for cctv clips with AH without injuries, from 23. 7. 2020 (p. 45 of pdf)
 - about the doctored TMZ 'kitchen cupboards' video The Sun played 9 times during the trial, from 15. 8. 2020 (p. 46 of pdf)
 - AH's real counterclaim or not?, from ? (p. 47 of pdf)
 - about Whitney Henriquez and Jeniffer Howell, from 18. 8. 2020 (p. 48 of pdf)
 - AH's real counterclaim or not?, from 18. 8. 2020 (p. 49 of pdf)
 - AH claims Laura Divenere was threatened and intimidated into witness testimony, from 2. 9. 2020 (p. 50 of pdf)
 - Chewbacca Defense against the police, from 13. 9. 2020 (p. 51 – 52 of pdf)
 - about ACLU, from 19. 9. 2020 (p. 53 of pdf)
 - witness bias and tampering, from 21. 9. 2020 (p. 54 – 59 of pdf)
- Adam Waldman insulting & in memoriam statements/tweets (p. 62 – 84 of pdf, exh. 6), some copies fairly illegible
 - penalty for perjury, 12. 9. 2020 (p. 62 of pdf)
 - in memoriam of an article, from 7. 7. 2020 (p. 63 of pdf)
 - hoax incident 14, May 21 2016, from 10. 7. 2020 (p. 64 of pdf)
 - AH's claims and pictures, from 11. 7. 2020 (p. 65 of pdf)
 - retweet of an article about Australia, from 15. 7. 2020 (p. 66 of pdf)
 - AH stole Kate James' rape survival story, from 15. 7. 2020 (p. 67 of pdf)
 - first article in People, from 16. 7. 2020 (p. 68 of pdf)
 - Elon Musk's regular visits of AH in PHs, from ?. 7. 2020 (p. 69 of pdf)

- Laura Divenere's 'truth', from 16. 7. 2020 (p. 70 – 73 of pdf)
- Amanda de Cadenet won't appear at the trial, from 18. 7. 2020 (p. 74 – 75 of pdf)
- Laura Divenere, from 18. 7. 2020 (p. 76 – 77 of pdf)
- photo of AH from 23. 3. 2013, from 27. 7. 2020 (p. 78 of pdf)
- Whitney Henriquez denies AH, from 25. 7. 2020 (p. 80 of pdf)
- AH meets with lawyer Gloria Allred's firm, from 5. 8. 2020 (p. 81 of pdf)
- Laura Divenere, from 18. 9. 2020 (p. 82 – 84 of pdf)
- a table of articles and quotes arranged by date from 12. 4. 2019 to 15. 6. 2020 (p. 86 – 91 of pdf, exh. 7)
 - article *Swimsuit-clad Amber Heard is caught on surveillance tape cuddling up to Elon Musk in Johnny Depp's private penthouse elevator, as actor accuses her of starting affair with billionaire a month into their marriage* by Ben Ashford for [Daily Mail](#) from 26. 3. 2020, 16:12 GMT
 - article *Johnny Depp's ex-wife Vanessa Paradis calls Amber Heard's violent allegations 'False Facts'* by Mike Walters for [The Blast](#) from 16. 3. 2020, 9:20
 - article *Johnny Depp told doctor he chopped off his own finger* by Phoebe Southworth for [The Telegraph](#) from 18. 3. 2020, 17:24
 - article *Elon Musk urges Johnny Depp and Amber Heard to 'bury the hatchet' in ongoing legal battle* by Phoebe Southworth for [The Telegraph](#) from 19. 6. 2020, 20:32
 - article *Amber Heard's 'sexual violence' evidence against Johnny Depp will be kept secret in his libel claim against the Sun despite him arguing claims should be made public* by Ross Ibbetson for [Daily Mail](#) from 8. 4. 2020, 21:26 GMT
 - article *Amber Heard 'was serially violent to Johnny Depp and concocted abuse hoax' his lawyer claims* by Nika Shakhnazarova for [The Mirror](#) from 2. 2. 2020, 19:58
 - article *Amber Heard loses 'Time's Up' attorney Roberta Kaplan in Johnny Depp case* by Mike Walters for [The Blast](#) from 15. 6. 2020, 12:55
 - article *Amber Heard is seen smirking, rolling her eyes and nibbling on cookies as she's forced to listen to herself admitting on tape that she 'clocked' Johnny Depp in the face* by Ben Ashford for [Daily Mail](#) from 20. 3. 2020, 12:07 GMT
 - article *Amber Heard had threesome affair with Cara Delevingne and Elon Musk, says witness during Johnny Depp lawsuit* by Sara Aisha-Kent for [The Mirror](#) from 17. 6. 2020, 21:53
 - article *Amber Heard hits back at Johnny Depp in shocking court docs detailing 'violent rages and drug binges'* by James Beal for [The Sun](#) from 12. 4. 2019, 22:52
 - article *Amber Heard's father accused to threatening to shoot Johnny Depp* by Mike Walters for [The Blast](#) from 30. 11. 2019, 16:42
 - article *Amber Heard's mom texted Johnny Depp 'I love you, son' after alleged domestic violence* by Mike Walters for [The Blast](#) from 20. 12. 2019, 16:42

- article *Johnny Depp ordered to release booze & drug use records in \$50m defamation case against Amber Heard; 'Pirates' star's lawyer blasts 'abuse hoax'* by Dominic Patten for [Deadline](#) from 22. 10. 2019, 17:26
- article *Johnny Depp scores legal victory, allowed use of police testimony Amber Heard had no visible injuries* by Mike Walters for [The Blast](#) from 15. 12. 2019, 8:27
- article *Warnes Bros. 'freaking out' Depp suit will harm Harry Potter films* by Emily Smith for [Page Six](#) from 12. 4. 2019, 18:42
- **25. 09. 2020 – order denying AH's motions in limine** ([pdf](#)) ✓
- **25. 09. 2020 – CJ Roberts' deposition** (CjRo 20-09-25 dp)
- **25. 09. 2020 – Tara Roberts' deposition** (TaRo 20-09-25 dp)
- **25. 09. 2020 – foreign subpoena for ACLU** ([pdf](#))
- **28. 09. 2020 – Edward White's deposition** (EdWh 20-09-28 dp)
- **28. 09. 2020 – corporate designee for Edward White's deposition** (EdWhCD 20-09-28 dp)
- **28. 09. 2020 – AH's counterclaim to JD's demurrer and plea in bar to counterclaims praecipe** ([pdf](#))
- **28. 09. 2020 – AH's memorandum in opposition to JD's demurrer and plea in bar to counterclaims** ([pdf](#)) ✓
- **28. 09. 2020 – foreign subpoena for Elon Musk** ([pdf](#), [pdf](#))
- **29. 09. 2020 – Keenan Whatt's deposition** (KeWh 20-09-29 dp)
- **30. 09. 2020 – Alejandro Romero's deposition** (AlRo 20-09-30 dp)
- **30. 09. 2020 – Laura Divenere's deposition** (LaDi 20-09-20 dp)
- **30. 09. 2021 – consent order that JD shall produce all non-privileged documents to certain requests from 4th, 5th, 6th and 7th RFPs** is on p. 36 – 39 of pdf of AH's motion to compel & memorandum production of documents and responses to AH's 1st, 2nd, 4th and 5th RFPs ([AH-Product](#)) ✓
- **30. 09. 2020 – JD's supplemental responses and objections to AH's 7th RFPs's p. 13 – 14** are attachment 1 in AH's memorandum supporting her cross motion to compel JD's production of forensic evidence from 15. 10. 2021, p. 10 – 15 of pdf ([AH-MemoCrossMot](#)) ✓
- **02. 10. 2020 – JD's opposition to AH's motion to compel his deposition, production of documents and sanctions** ([pdf](#)) ✓
 - emails from Mr. Eckerle [of Warner Bors.] to Mr. Whit, from Mr. White to Mr. Chew, from Mr. Chew to Ms. Bredehoft from 19. 8. 2020, regarding JD's filming schedule for Fantastic Beasts (p. 8 – 11 of pdf)
 - UK coronavirus travel corridors from 26. 9. 2020 (p. 12 – 20 of pdf)
 - email from Mr. Eckerle to Mr. White then from Mr. White to Mr. Chew from 19. 8. 2020 (p. 21 – 23 of pdf)
 - emails between Mr. Chew, Mr. Wayne, Mr. Rottenborn and Ms. Bredehoft from 4. and 8. 9. 2020 (p. 24 – 32 of pdf)

- 05. 10. 2020 – JD's reply memorandum in support of his demurrer and plea in bar seeking dismissal of all counterclaims ([pdf](#)) ✓
- 10. 10. 2020 – order that JD shall produce non-privileged documents to certain RFPs ([pdf](#)) ✓
 - his tax returns showing gross income from 1. 1. 2012 but no supporting documents
- 15. 10. 2020 – order that JD shall be deposed in AH's counsel offices on Nov 10-12th and shall pay fees for his Oct deposition, but AH's 9 RFPs are denied ([pdf](#), [pdf](#)) ✓
- 16. 10. 2020 – AH's motion to compel praecipe ([pdf](#))
- 16. 10. 2020 – AH's motion to compel production of documents in response to her revised 8th RFPs and tax information pursuant to Oct 10th order ([pdf](#))
- 16. 10. 2020 – AH's memorandum in support of motion to compel production of documents in response to her revised 8th RFPs and tax information pursuant to Oct 10th order ([AH-MemoRevised8RFP](#)) ✓
 - AH wants everything from JD's four other litigations incl. related to AH's financial condition, Disney, JD's tax returns with gross income from 1. 2012 onwards
 - JD's responses and objections to AH's 8th RFPs from 9. 9. 2020 (p. 9 – 14 of pdf)
 - emails from Ms. Bredehoft to Brown Rudnick from 15. + 23. 9. 2020 (p. 15 – 19 pdf)
 - [order](#) from 10. 10. 2020 (p. 21 – 22 of pdf)
 - p. 3 – 4 from AH's 8th RFPs (p. 23 – 24 of pdf)
 - p. 1 + 5 from AH's 4th RFPs from 2. 7. 2020 (p. 25 – 26 of pdf)
 - p. 35 of hearing from 18. 9. 2020 (p. 27 28 of pdf)
- 16. 10. 2020 – JD's response to motion for sanctions praecipe ([pdf](#))
- 16. 10. 2020 – JD's reply memorandum in opposition to motion for sanctions against Adam Waldman ([JD-OppAdamWald](#), [pdf2](#)) ✓
 - ...Ms. Heard and/or her attorneys have repeatedly violated the operative Protective Order. Indeed, Ms. Heard's third and current lead counsel deliberately disclosed the entirety of Mr. Depp's "confidential" production to a third party tabloid in the United Kingdom, without Mr. Depp's consent. (p. 1) [[this is probably the financial information in the Rolling Stone article](#)]
 - Indeed, the majority of the public utterances by Mr. Waldman cited in the Motion relate to the UK action against *The Sun*, not this case. (p. 2)
 - Ms. Heard and her counsel made abundantly clear their intention of using this case as a P.R. campaign from the very start, when they filed a salacious, self-serving declaration attaching hundreds of pages of unnecessary, embarrassing photographs of Mr. Depp, in connection with a venue motion. (p. 3)
 - Ms. Heard neglects to inform the Court that she disclosed all of the documents she produced in this case to *The Sun*, and *voluntarily waived* the "confidential" designation of every document and deposition transcript, including that of Mr. Drew, for use in the UK proceedings (an action she was not a party to and which she had no disclosure obligations). (p. 4)
 - article *Johnny Depp Files \$50 Million Defamation Lawsuit Against Amber Heard* by Daniel Kreps for [Rolling Stone](#) from 2. 3. 2019, 14:06 ET (p. 8 – 9 of pdf)

- article *Amber Heard Has Filed New Allegations That Johnny Depp Abused Her During Drug-Fueled Rages* by Amber Jamieson for [BuzzFeedNews](#) from 12. 4. 2019 , 17:40 ET (p. 10 – 21 of pdf)
- article *Depp accuses Heard of painting on bruises* by Keiran Southern for [The Canberra Times](#) from 21. 5. 2019, 15:56 (p. 22 – 23 of pdf)
- article *Johnny Depp's lawyers subpoena James Franco over elevator ride he took with Amber Heard: report* by Nancy Dillon for [New York Daily News](#) from 2. 7. 2019 (p. 24 – 28 of pdf)
- article *Amber Heard Denies Putting Out Cigarette On Johnny Depp's Face* by David Moyer for [Huffpost](#) from 26. 7. 2019, 15:17 EDT (p. 29 – 31 of pdf)
- article *Johnny Depp Ordered to Hand Over Medical Records to Ex-Wife* by Joan Hennessy for [Coursehouse News Service](#) from 18. 10. 2019 (p. 31 – 33 of pdf)
- article *Amber Heard renews demand for biz records allegedly showing Johnny Depp 'violently abused' her, paid 'hush money'* from [New York Daily News](#) from 30. 10. 2019 (p. 33 – 37 of pdf)
- article *Johnny Depp's lawyer says Amber Heard 'perpetrated serial violence'; she fires back with abuse claims* by Hannah Yasharoff for [Usa Today](#) from 2. 2. 2020 (p. 38 – 40 of pdf)
- article *Johnny Depp Allowed to Pursue Defamation Suit Against Amber Heard* by Gene Maddaus for [Variety](#) from 27. 3. 2020, 13:27 PT (p. 40 – of pdf)
- article *911 call made on night of Johnny Depp and Amber Heard's violent confrontation released* for [Hindustan Times](#) from 28. 4. 2020, 18:18 IST (p. 42 – 43 of pdf)
- Roberta Kaplan's [tweets](#) [1, 2, 3, 4, 5] defaming JD from 11. 7. [2020] (p. 44 of pdf)
- Roberta Kaplan's [tweet](#) of an article, from 18. 7. 2020 (p. 45 of pdf)
- p. 1 – 4, 29 – 32 of transcript of hearing from 13. 12. 2019 (p. 46 – 48 of pdf)
- [protective order](#) regarding confidential information from 25. 9. 2019 (p. 49 – 65 of pdf)
- p. 1 – 4, 21 – 24, 33 – 40 of transcript of hearing from 13. 9. 2019 (p. 65 – 69 of pdf)
- article *Amber Heard called billionaire Elon Musk her "Rocketman" while she was married to Johnny Depp* by Tom Bryant for [The Mirror](#) from 24. 6. 2020, 21:15 (p. 70 – of pdf)
- **22. 10. 2020 – Elaine Charlson Bredehoft's declaration regarding fees ([pdf](#))**
- **23. 10. 2020 – JD's omnibus objection and request to strike new evidence and argument on reply, and oversized brief** is referenced in the hearing from 29. 10. 2020 which is on p. 289 – 302 of pdf of Joelle Rich's 5th UK witness statement from 14. 1. 2021 ([JoRi 21-01-14 w5](#)) ✓
 - requesting that the court strikes certain parts of AH's 'objection to request for judicial notice' and the 'declaration of John P. Cogger' filed in the reply
- **27. 10. 2020 – order revoking Mr. Waldman as counsel, denying AH protective order, granting her attorneys' fees ([pdf](#))** ✓
- **27. 10. 2020 – JD's motion for protective order praecipe ([pdf](#))**
- **28. 10. 2020 – JD's opposition to reasonableness of AH's attorneys' fees and costs ([pdf](#))**
- **29. 10. 2020 – JD's motion to compel RFPs and ROGs praecipe ([pdf](#))**

- 29. 10. 2020 – JD's motion to compel RFPs and ROGs ([pdf](#))
- 29. 10. 2020 – JD's memorandum in support of his motion to compel AH's responses to 2nd and 3rd RFPs and 2nd ROGs ([JD-Memo2+3RFP+2ROG](#)) ✓
 - No privilege protects communications between Ms. Heard and The Sun, as they are not in an attorney-client relationship. (p. 2)
 - Mr. Depp contends that [AH] sought to leverage these allegations to obtain a larger divorce settlement, and to market herself to the world as a courageous survivor, rather than an abuser. (p. 4)
 - AH's responses and objections to JD's 2nd RFPs from 25. 11. 2019 (p. 10 – 26 of pdf, exh. 1)
 - AH's responses and objections to JD's 3rd RFPs from 4. 9. 2020 (p. 28 – 64 of pdf, exh. 2)
 - AH's responses and objections to JD's 2nd ROGs from 25. 11. 2019 (p. 66 – 80 of pdf, exh. 3)
 - article *Amber Heard to donate \$7M Depp divorce settlement to charities* by Elle Hunt for [The Guardian](#) from 18. 8. 2016, 23:11 EDT (p. 82 – 83 of pdf, exh. 4)
 - *Amber Heard donates Johnny Depp divorce settlement to charity: Read her statement in full* by Olivia Blair for [Independent](#) from 19. 8. 2016, 11:30 (p. 85 – 87 of pdf, exh. 5)
 - *Amber Heard Donates Johnny Depp's \$7 Million Divorce Settlement To Charity; Could Face Huge Tax Bill* by Toni Nitti for [Forbes](#) from 21. 8. 2016, 14:11 EDT (p. 89 – 93 of pdf, exh. 6)
 - article *Amber Heard donates \$7M Johnny Depp divorce settlement to children's hospital, charities* by Katherine Lam for [Fox News](#) from 10. 4. 2018 (p. 95 – 96 of pdf, exh. 7)
- 29. 10. 2020 – hearing regarding AH's quash of subpoena to CHLA is on p. 289 – 302 of pdf of Joelle Rich's 5th UK witness statement from 14. 1. 2021 ([JoRi 21-01-14 w5](#)) ✓
 - court denies AH's CHLA petition, except two requests about communications with CHLA about JD's and AH's relationship
- 29. 10. 2020 – foreign subpoena for Christian Carino ([pdf](#))
- 29. 10. 2020 – foreign subpoena for Laura Divenere ([pdf](#))
- 29. 10. 2020 – foreign subpoena for Tracey Jacobs ([pdf](#))
- 29. 10. 2020 – foreign subpoena for Jack Wigham ([pdf](#))
- 30. 10. 2020 – AH's motion to compel deposition of Adam Waldman
- 02. 11. 2020 – J. Benjamin Rottenborn's declaration regarding fees ([pdf](#))
- 02. 11. 2020 – consent motion to withdraw Mr. McEvoy and Mr. Roche as AH's counsel ([pdf](#))
- 05. 11. 2020 – affidavit of service for Raquel Pennington ([pdf](#))
- 05. 11. 2020 – affidavit of service for Tasya van Ree ([pdf](#))
- 05. 11. 2020 – affidavit of service for iO Tillet Wright ([pdf](#))
- 06. 11. 2020 – consent order granting counsel withdrawal ([pdf](#)) ✓
- 06. 11. 2020 – order awarding AH attorneys' fees ([pdf](#)) ✓

- **09. 11. 2020 – JD's opposition to reasonableness of AH's attorneys' fees and costs** ([pdf](#))
- **10. – 12. 11. 2020 – JD's deposition** (JD 20-11-10-12 dp)
- **10. 11. 2020 – Johnny Depp's deposition** (JoDe 20-11-10 dp): p. 70 – 71, 74 are on p. 158 – 162 of pdf in AH's memorandum in opposition to JD's motion to compel her responses to 2nd and 3rd RFPs and 2nd ROGs from 11. 12. 2020 ([pdf](#)), p. 73 – 74 are attachment 4 in AH's 2nd notification of judicial notice of adjudicated facts and law from 7. 7. 2021, p. 86 – 89 of pdf ([AdjuFacts2](#)), and p. 107 – 110 are exhibit C in AH's notice of deposition by video for corporate designee for Walt Disney Motion Pictures Group from 6. 1. 2022 ([jpg](#)) ✓
 - I have only been led to understand that –... **when she... breached the [divorce] agreement, then I was able to in fact make the first set of donations to those charities myself**, but I put it in her name. ...and then Ms. Heard came out and wildly complained about it, saying that I should be charged the double, 14 million, because I was trying to use that as a tax write-off. (p. 70)
 - Did you pay any of the seven million in settlement to Amber Heard because she alleged that you had engaged in domestic violence against her? -- No, **she dropped the charges**. (p. 70 – 71)
 - So none of the \$7 million that you paid to Amber Heard was because or as a result of her alleging that you'd engaged in domestic abuse or violence...? -- **None of the \$7 million that she was awarded in the divorce had anything to do with any ... of her claims, any of that, no**. (p. 73 – 74)
 - Sean Bailey ... wasn't man enough to --- listen, I was involved in five films in that series of Pirates of the Caribbean, and I was very lucky to be a part of that, and I was very happy -- **I'm happy still that I was a part of that because I have a character that has made a lot of people smile and happy, and that gives me great pleasure**, but when ... these people, who have made upwards of four, five, six, seven billion, eight billion dollars on a ration of films that ou've done for them and your character is on the ride in Disneyland in three different spots ..., I've found it fascinating that not one call. **Nobody was man enough to give me the boot based on allegations, and -- but it was still okay to leave the supposed wife-beater on the rides, and itis still okay for them to sell merchandise of the supposed wife-beater, and they can still sell action figures of the supposed wife-beater**. They haven't taken me off their rides. So I would say that something's rotten in the state of Denmark. – **Do you know for sure that you are not going to be part of Pirates 6? – Without question**. (p. [107](#) – [108](#))
 - I can tell you the God's honest truth right now, based on everything, if they came to me with \$300 million and a million alpacas, nothing under this earth, on this earth would get me to go back and work with Disney on a Pirates of the Caribbean film. (p. 109 – 110)
- **10. 11. 2020 – foreign subpoena for Action Property Management** ([pdf](#), [pdf](#), [pdf](#), [pdf](#))
- **10. 11. 2020 – foreign subpoena for Robin Baum** ([pdf](#))
- **10. 11. 2020 – foreign subpoena for Christian Carino** ([pdf](#))
- **10. 11. 2020 – foreign subpoena for Laura Divenere** ([pdf](#))
- **10. 11. 2020 – foreign subpoena for Trinity Esparza** ([pdf](#))

- 10. 11. 2020 – foreign subpoena for Cornelius Harrell ([pdf](#))
- 10. 11. 2020 – foreign subpoena for Tracey Jacobs ([pdf](#))
- 10. 11. 2020 – foreign subpoena for Brandon Patterson ([pdf](#))
- 10. 11. 2020 – foreign subpoena for Alejandro Romero ([pdf](#))
- 10. 11. 2020 – foreign subpoena for Laura Wasser ([pdf](#))
- 10. 11. 2020 – foreign subpoena for Wasser, Cooperman & Mandles ([pdf](#))
- 10. 11. 2020 – foreign subpoena for Jack Whigham ([pdf](#))
- 11. 11. 2020 – Johnny Depp's deposition (JoDe 20-11-11 dp)'s p. 396 – 401 and 407 are on p. 35 – 47 of pdf in AH's memorandum in support of supplemental plea in bar from 14. 6. 2021 ([AH-MemoSupplemPleaBar](#)) ✓
 - ...I think the other side was lacking in some of their medical evidence. (p. 396)
 - ...I don't recall that there were any witnesses that I wanted, that I was desperate for and we didn't get, no. (p. 398)
 - That's one man's opinion [judge Nicol's], and he's entitled to that. (p. 407)
- 12. 11. 2020 – Johnny Depp's deposition (JoDe 20-11-12 dp)'s p. 605 – 619 are on p. 21 – 36 of pdf in AH's memorandum in opposition to JD's motion to quash and for a protective order 4. 1. 2021 ([AH-MemoQuashProtectOrder](#)), and p. 618 – 619, 648 – 652 are attachment 10 in AH's memorandum in support of motion to compel responses to 10th RFPs from 9. 6. 2021, p. 189 – 198 of pdf ([AH-MemoFor10FRPs](#)) ✓
 - ...so sometime between August 2016 and the end of 2016 is when you met Adam Waldman and hired him. -- I think it was around Octoberish. (p. 605)
 - ...an Instagram account... 's the first time I've ever had any kind of social... media experience, and to be honest, I don't have a team. ...there's a woman friend of mine's misses who runs it for me. (p. 618)
 - She's the wife of a friend of mine, a dear friend of mine. -- Is this Gina Deuters? -- It is indeed, yes. (p. 648) [the person managing his Instagram account]
- 13. 11. 2020 – JD's opposition to AH's motion to compel praecipe ([pdf](#))
- 13. 11. 2020 – JD's opposition to AH's motion to compel 8th RFPs and tax information ([pdf](#)) ✓
- 18. 11. 2020 – AH's motion to compel praecipe ([pdf](#))
- 18. 11. 2020 – AH's motion to compel & memorandum for production of documents and responses to AH's 1st, 2nd, 4th and 5th RFPs ([AH-Memo1+2+4+5RFPs](#), [pdf2](#)) ✓
 - Jenny Campbell Afia 8th UK witness statement from 28. 6. 2020 (p. 12 – 17 of pdf)
 - email from Ms. Bredehoft to Mr. Chew regarding documents JD has not produced, from 5. 11. 2020 (p. 18 – 24 of pdf)
 - Mr. Chew response to Ms. Bredehoft's above email from 10. 11. 2020 (p. 25 – 32 of pdf) – JD has produced more than 18,000 pages of documents, far more than AH
 - AH's request to JD to produce all non-privileged, responsive documents is granted on 18. 10. 2019 (p. 33 of pdf)
 - AH's motion to compel production of documents granted and denied, from 10. 8. 2020 (p. 34 – 35 of pdf)
 - consent order respecting JD's responses to 4th, 5th, 6th and 7th RFPs from 30. 9. 2020 (p. 36 – 39 of pdf)

- **19. 11. 2020 – order denying AH's request for protective order** ([pdf](#)) ✓
- **19. 11. 2020 – notice for AH's motion to quash certain foreign subpoenas** ([jpg](#))
- **20. 11. 2020 – hearing's** p. 15 – 16 are attachment 2 in AH's memorandum for motion in support of motion to compel and for relief based on JD's failure to timely produce discovery before the deposition of Tracey Jacobs from 9. 6. 2021, p. 16 – 19 of pdf ([AH-Relief](#)), and p. 30 – 31 are in JD's opposition to compel responses to 10th RFPs from 25. 6. 2021, p. 21 – 24 of pdf ([JD-Opp10RFP](#)), and p. 13 – 14, 17 – 19 and are attachment 5 in AH's AH's memorandum in opposition to JD's motion to compel AH's further responses without objections and production of documents in response to 4th RFPs from 23. 04. 2021, p. 118 – 125 of pdf ([AH-OppFurterResponses+4RFP](#)) ✓
 - The Bloom case involved Mr. Depp's former lawyer, who illegally took 5 percent of his income from a period between 1999 and April 2017. ... As a result of that ruling in this case, the firm of Bloom, Hergott was disbanded because he had perpetrated that scheme on several other people, including Sylvester Stallone. That case also involved approximately one million documents. (p. 15 – 16)
 - The TMG case involved Mr. Depp's former manager prior to Ed White. Mr. Mandeer was the manager from 1999 through March of 2016. He breached fiduciary duties and misappropriated tens of millions of dollars. Again, the case involved approximately one million documents... (p. 16)
 - The Rocky Brook's case is a comically frivolous case involving an incident more than a year after the divorce. The bodyguard's case involved an esoteric dispute as to whether the two gentlemen employees were either employees or independent contractors. (p. 16)
 - ...the only other woman in Mr. Depp's 57 years who ever accused him of abuse was Ms. Heard. (p. 17)
 - Mr. Depp testified last week that Disney never wrote or otherwise informed him that it had cut him loose from the Pirates of the Caribbean series only days after Ms. Heard published her op-ed in the Washington Post. Mr. Depp had to read about it in the newspaper. (p. 18)
 - [Ms. Bredehoft,] you risk losing credibility with the Court when you come before the Court and accuse the other side of not following the rules. Yet, you repeatedly have tried to add matters to the argument docket that were not in the docket. That would be a violation of the rules. You also send vastly overbroad requests apparently in the hope that they will negotiate something better than what you might have gotten had you sent a reasonable request in the first place. (p. 31)
- **23. 11. 2020 – order awarding AH attorneys' fees** ([pdf](#)) ✓
- **25. 11. 2020 – order that JD shall produce portions of tax returns for gross income from Jan 2012 to present & documents to only No. 8 8th RFPs** ([pdf](#)) ✓
- **11. 2020 – AH's 3rd RFAs**
- **01. 12. 2020 – foreign subpoena for Fireman's Fund Insurance Company** ([pdf](#))
- **01. 12. 2020 – foreign subpoena for Melanie Inglessis** ([pdf](#))
- **01. 12. 2020 – foreign subpoena for dr. David Kipper** ([pdf](#), [pdf](#))

- **01. 12. 2020** – foreign subpoena for Debbie Lloyd ([pdf](#), [pdf](#))
- **01. 12. 2020** – foreign subpoena for Raquel Pennington ([pdf](#))
- **03. 12. 2020** – scheduling order ([pdf](#)) ✓
- **10./11. 12. 2020** – amended subpoena to CHLA from JD is on p. 42 – 44 of pdf of Joelle Rich's 5th UK witness statement from 14. 1. 2021 ([JoRi 21-01-14 w5](#))
- **11. 12. 2020** – AH's opposition to JD's motion to compel praecipe ([pdf](#))
- **11. 12. 2020** – AH's memorandum in opposition to JD's motion to compel her responses to 2nd and 3rd RFPs and 2nd ROGs ([pdf](#)) ✓
 - IV. How [AH] spent her divorce settlement money is irrelevant and overbroad
 - requests no. 6 – 9, 22 – 26 from AH's responses and objections to JD's 2nd RFPs from 25. 11. 2019 (p. 9 – 15 of pdf)
 - requests no. 41 – 53 from AH's responses and objections to JD's 3rd RFPs from 4. 9. 2020 (p. 16 – 25 of pdf)
 - UK [judgement](#) from 2. 11. 2020 (p. 26 – 153 of pdf)
 - p. 35 from hearing from 18. 9. 2020 (p. 155 – 157 of pdf)
 - p. 70 – 71, 74 from deposition of Johnny Depp from 10. 11. 2020 (p. 158 – 162 of pdf)
 - ROG's no. 8 – 11 from AH's responses and objections to JD's 2nd ROGs from 25. 11. 2019 (p. 163 – 168 of pdf)
- **14. 12. 2020** – notice for JD's emergency motion to de-designate ([pdf](#))
- **14. 12. 2020** – foreign subpoena for Greg Williams ([pdf](#))
- **15. 12. 2020** – calendar control order ([pdf](#)) ✓
- **15. 12. 2020** – foreign subpoena for ACLU ([pdf](#))
- **16. 12. 2022** – Laura Wasser's deposition
- **16. 12. 2020** – order de-designating CHLA documents from confidential is exhibit 11 in affirmation of Jessica Meyers in support of JD's petition to compel response to out-of-state subpoenas for ACLU from 10. 5. 2021 ([JeMe 21-05-10 aff](#)) ✓
- **18. 12. 2020** – **hearing** is on p. 232 – 264 of pdf of Joelle Rich's 5th UK witness statement from 14. 1. 2021 ([JoRi 21-01-14 w5](#)) and exhibit 12 ([exh. 12](#)) in affirmation of Jessica Meyers in support of JD's petition to compel response to out-of-state subpoenas for ACLU from 10. 5. 2021, and p. 19 – 21 of pdf are also attachment 7 in AH's 2nd notification of adjudicated facts from 7. 7. 2021 ([AdjuFacts2](#)) ✓
 - [AH] said she had donated the money, and that's material. And she said it under oath, your Honor. (p. 9)
 - The whole point – the whole allegation of abuse was an extortion attempt, a successful one. (p. 24)
 - AH's arrest records, identities of romantic partners and charity donations are granted
- **18. 12. 2020** – foreign subpoena for iO Tillet Wright ([pdf](#))
- **22. 12. 2020** – foreign subpoena for Bianca Butti ([pdf](#), [pdf](#))
- **22. 12. 2020** – foreign subpoena for Whitney Henriquez ([pdf](#), [pdf](#))
- **22. 12. 2020** – foreign subpoena for Tasya van Ree ([pdf](#), [pdf](#))
- **22. 12. 2020** – foreign subpoena for iO Tillet Wright ([pdf](#))

- 22. 12. 2020 – letter to judge White regarding proposed order ([pdf](#))
- 23. 12. 2020 – letter to judge White regarding proposed order ([pdf](#))
- 28. 12. 2020 – affidavit of service ([pdf](#))
- 28. 12. 2020 – notice for motion scheduling ([pdf](#))
- 29. 12. 2020 – notice for motion scheduling ([pdf](#))
- 29. 12. 2020 – JD's opposition to AH's motion to compel praecipe ([pdf](#))
- 29. 12. 2020 – JD's opposition to AH's motion to compel deposition of Adam Waldman ([pdf](#)) ✓
- 29. 12. 2020 – JD's 4th RFPs are exhibit 1 in JD's memorandum in support of his motion to compel AH's further responses without objections and production of documents in response to 4th RFPs from 12. 2. 2021, p. 9 – 25 of pdf ([JD-MemoFurtherRespons4RFPs](#)) ✓
 - 1. tax returns from 2010 onwards
 - 2. any roles considered and rejected from 2010 onwards
 - 3. total or anticipated compensation for any roles from 2010 onwards
 - 4. all contracts from 2010 onwards
 - 5. – 8. all reflecting impact of relationship with JD, divorce, UK litigation, abuse allegations, Adam Waldman's public statements, any public statements on your career
 - 11. all reflecting potential damages
 - 12. – 34. all related to counterclaims
 - 35. – 36. communications with Bianca Butti or anyone else related to allegations of violence or abuse by JD
 - 37. – 42. donations
 - 38. publicity arising from the divorce, incl. charity claims
- 30. 12. 2020 – order denying to quash or compel Mr. Waldman's deposition ([pdf](#)) ✓
- 30. 12. 2020 – order compelling AH to produce certain documents from JD's 2nd and 3ds RFPs is attachment 5 in AH's opposition to JD's motion to compel production of original devices and operating system drives and cloud backups of these original devices as requested in JD's 7th RFPs from 22. 10. 2021, p. 38 – 39 of pdf ([AH-OppForensEvid](#)) ✓
- 30. 12. 2020 – AH's motion for order establishing adjudication process for attorneys' fees praecipe ([pdf](#))
- 30. 12. 2020 – AH's motion for order establishing adjudication process for attorneys' fees ([pdf](#))
- 30. 12. 2020 – AH's memorandum supporting for entry of an order establishing adjudication process for attorneys' fees ([pdf](#)) ✓
 - proposed consent order regarding adjudication process for attorneys' fees (p. 9 – 10 of pdf, att. 1)
- 30. 12. 2020 – order that AH shall produce everything under no. 7 of 2nd RFPs and no. 44, 45, 47 of 3rd RFPs, and no. 1, 7, 9 of 2nd ROGs, related to charity donations, ([exh. 13](#)) is also exhibit 13 in affirmation of Jessica Meyers in support of JD's petition to

compel response to out-of-state subpoenas for ACLU from 10. 5. 2021 ([JeMe 21-05-10 aff](#)) ✓

- **01. 01. 2021 – AH's corrected 10th RFPs** are extracted from JD's responses and objections to AH's corrected 10th RFPs which are attachment 3 in in AH's memorandum for motion in support of motion to compel and for relief based on JD's failure to timely produce discovery before the deposition of Tracey Jacobs from 9. 6. 2021, p. 20 – 27 of pdf ([AH-Relief](#)) and attachment 1 in AH's memorandum in support of motion to compel responses to 10th RFPs from 9. 6. 2021, p. 10 – 44 of pdf ([AH-MemoFor10FRPs](#)) ✓
 - 1. – 2. all communications and contracts between JD and Altour from 2019 onward
 - 3. – 4. all communications and contracts between JD and Eyes on U from 2019 onwards
 - 5. everything from the UK case related to this case
 - 6. all docs used by Mr. White when producing EWC 1-52
 - 7. + 9. everything from any consulted expert
 - 8. detailed time and billing records for all legal services connected to this case
 - 10. all for each pleaded defense
 - 11. copies of all publications reflecting negatively on JD's reputation
 - 12. – 14. all reflecting loss or reputation, roles and commercial opportunities from December 2018 onwards
 - 19. all payments to dr. Kipper from 1. 5. 2014 onwards
 - 20. all payments to a bunch of people which incl. witnesses
 - 21. all photos, videos, audios with AH
 - 22. all for any computer, internet or social media service from 2016 onwards
- **04. 01. 2021 – judge White's 3rd opinion letter** ([White-OpLetter3](#), [pdf2](#)) is also on p. 27 – 37 of pdf in JD's opposition to motion for leave to file an amended answer & ground of defense and supplemental plea in bar from 21. 5. 2021 ([JD-OppSupplPleaBar](#)) ✓
 - all but three statements of AH's counterclaims, made by Adam Waldman within the one-year statute of limitations, are dismissed
 - F. On April 8, 2020, Mr. Depp, through his attorney, told *The Daily Mail* that "Amber Heard and her friends in the media use fake sexual violence allegations as both a sword and shield, depending on their needs. They have selected some of her sexual violence hoax 'facts' as the sword, inflicting them on the public and Mr. Depp." [from article *Amber Heard's 'sexual violence' evidence against Johnny Depp will be kept secret in his libel claim against The Sun despite him arguing claims should be made public* by Ross Ibbetson for [Daily Mail](#) from 8. 4. 2020, 21:26 GMT]
 - G. On April 27, 2020, Mr. Depp, through his attorney, again told *The Daily Mail* that "[q]uite simply this was an ambush, a hoax. They set Mr. Depp up by calling the cops but the first attempt didn't do the trick. The officers came to the penthouses, thoroughly searched and interviewed, and left after seeing no damage to face or property. So Amber and her friends spilled a little wine and roughed the place up, got their stories straight under the directions of a lawyer and publicist, and then placed a second call to 911." [from article *'I need to report an assault'. Listen to 911 call made the night Johnny Depp and Amber Heard had blowout fight that*

ended their toxic 18-month marriage – but both claim tape backs up their version of events by Ben Ashford for [Daily Mail](#) from 27. 4. 2020, 18:45 GMT] [er, why is then no spilled wine and no damage seen on the bodycams?]

- H. On June 24, 2020, Mr. Depp, through his attorney, accused Ms. Heard in *The Daily Mail* of committing an "abuse hoax" against Mr. Depp. [from article *MeToo activist Amanda de Cadenet drops support for close friend Amber Heard and will no longer testify after listening to her 'verbally abusing' Johnny Depp in bombshell tapes, as she feels 'used and manipulated' by actress* by Ben Ashford for [Daily Mail](#) from 24. 6. 2020, 22:28 GMT]
- **04. 01. 2021 – order regarding de-designating** ([pdf](#)) ✓
- **04. 01. 2021 – AH's motion in opposition to motion to quash praecipe** ([pdf](#))
- **04. 01. 2021 – AH's memorandum in opposition to JD's motion to quash and for a protective order** ([AH-MemoQuashProtectOrder](#)) ✓
 - AH's notice of deposition by video for Adam Waldman from 14. 8. 2020 (p. 9 – 11 of pdf)
 - email from Ms. Nredchoft to Brown Rudnick from 14. 8. 2020 (p. 12 of pdf)
 - AH's notice of deposition by video for Adam Waldman from 14. 8. 2020 (p. 13 – 16 of pdf)
 - agreed [order](#) from 16. 8. 2019 (p. 16 – 18 of pdf)
 - Adam Waldman's tweet with AH's Op-Ed from 12. 5. 2020 (p. 20 of pdf)
 - p. 605 – 619 from deposition of Johnny Depp from 12. 11. 2020 (p. 21 – 36 of pdf)
 - two subpoenas to Twitter from AH (p. 37 – 86 of pdf)
 - email from Mr. Chew to Ms. Bredechoft from 27. 10. 2020 (p. 87 of pdf)
- **04. 01. 2021 – AH's production of documents responsive to requests 44 – 47 of JD's 3rd RFPs**, documents responsive to ACLU and CHLA are exhibit 14 and 15 in affirmation of Jessica Meyers in support of JD's petition to compel response to out-of-state subpoenas for ACLU from 10. 5. 2021 ([exh. 14](#), [exh. 15](#))
 - these are the documents that revealed that **AH didn't donate the entire amount of her divorce settlement to ACLU and CHLA (only \$100,00 to CHLA and \$450,000 to ACLU), incl. the undated and unsigned pledge form with the centennial logo**
- **05. 01. 2021 – agreed order de-designating certain JD's financial documents and tax returns as not confidential** ([pdf](#)) ✓
- **07. 01. 2021 – foreign subpoena for Christian Carino** ([pdf](#))
- **07. 01. 2021 – foreign subpoena for Laura Divenere** ([pdf](#))
- **07. 01. 2021 – foreign subpoena for Tracey Jacobs** ([pdf](#))
- **07. 01. 2021 – foreign subpoena for Debbie Lloyd** ([pdf](#))
- **07. 01. 2021 – foreign subpoena for Michele Mulrooney** ([pdf](#))
- **07. 01. 2021 – foreign subpoena for Wasser, Cooperman & Mandels** (pdf, [pdf](#))
 - JD's nature of the action in support of his complaint against AH, with exhibits listed below, from 1. 3. 2019 (p. 11 – 65 of pdf)
 - article *Amber Heard: I spoke up against sexual violence – and faced our culture's wrath. That has to change.* from the [Washington Post](#) from 18. 12. 2018 (p. 42 – 45 of pdf)

- article *A transformative moment for women* by Amber Heard in the Washington Post on 19. 9. 2018 (p. 47 – 48 of pdf)
- AH's [tweet](#) about the op-ed from 19. 12. 2018 (p. 50 of pdf)
- receipt for JD's complaint from 1. 3. 2019 (p. 51 of pdf)
- counsel of record for all parties regarding subpoenas from 23. 12. 2020 (p. 52 – 65 of pdf)
- email from Ms. Bredehoft to Mr. Frey from 23. 12. 2020 (p. 65 of pdf)
- **07. 01. 2021 – foreign subpoena for Jack Whigham** ([pdf](#))
- **08. 01. 2021 – JD's opposition to AH's motion to compel praecipe** ([pdf](#))
- **08. 01. 2021 – JD's opposition to AH's motion to compel JD to abide by previous orders and produce documents and responses to AH's 1st, 2nd, 4th, and 5th RFPs, and for sanctions for continuing violations of court's orders and motion for sanctions for AH's violations of court's orders and procedure regarding discovery** ([pdf](#)) ✓
 - email from Ms. Vasquez to Ms. Bredehoft regarding pending motion to compel from 5. 1. 2021 (p. 8 of pdf)
- **11. 01. 2021 – foreign subpoena for Sean Bett** ([pdf](#))
- **11. 01. 2021 – foreign subpoena for Christi Dembrowski** ([pdf](#))
- **11. 01. 2021 – foreign subpoena for Stephen Deuters** ([pdf](#))
- **11. 01. 2021 – foreign subpoena for LAPD Discovery Section** ([pdf](#))
- **11. 01. 2021 – foreign subpoena for Walt Disney Motion Pictures Group** ([pdf](#))
- **12. 01. 2021 – foreign subpoena for Erin Boerum** ([pdf](#))
- **12. 01. 2021 – agreed order granting JD his opposition from 8. 1.** ([pdf](#)) ✓
- **13. 01. 2021 – Cornelius Harrell's deposition**
- **14. 01. 2021 – order denying AH Mr. Waldman's deposition, but protective order for it has been denied too** ([pdf](#)) ✓
- **14. 01. 2021 – JD's motion to deny the remainder of AH's plea in bar praecipe** ([pdf](#))
- **14. 01. 2021 – JD's motion to deny the remainder of AH's plea in bar** ([pdf](#))
- **14. 01. 2021 – JD's memorandum in support of his motion to deny the remainder of AH's plea in bar** ([JD-MemoToDenyRemainderPleaBar](#)) ✓
 - judge White's 2nd [opinion letter](#) from 27. 3. 2020 (p. 6 – 15 of pdf, exh. A)
 - judge White's 3rd [opinion letter](#) from 4. 1. 2021 (p. 16 – 26 of pdf, exh. B)
- **15. 01. 2021 – Laura Divenere's deposition**
- **15. 01. 2021 – JD's opposition to AH's motion to order establishing adjudication process for attorneys' fees praecipe** ([pdf](#))
- **15. 01. 2021 – JD's opposition to AH's motion to order establishing adjudication process for attorneys' fees** ([pdf](#))
 - judge White's 3rd [opinion letter](#) from 4. 1. 2021 (p. 5 – 14 of pdf)
- **18. 01. 2021 – Tracey Jacobs' deposition**
- **19. 01. 2021 – Christian Carino's deposition I**
- **19. 01. 2021 – AH's responses and objections to JD's 4th RFPs** are exhibit 2 in JD's memorandum in support of motion to compel AH's further responses without objections and production of documents in response to 4th RFPs from 12. 2. 2021, p. 27 – 113 of pdf ([JD-MemoFurtherRespon4RFPs](#)) ✓

- **20. 01. 2021 – Jack Whigham's deposition**
- **20. 01. 2021 – order denying AH's motion to remove JD's motion to deny her plea in bar** ([pdf](#)) ✓
- **21. 01. 2021 – foreign subpoena for The Art of Elysium** ([pdf](#))
- **21. 01. 2021 – foreign subpoena for Tyler Hadden** ([pdf](#))
- **21. 01. 2021 – foreign subpoena for Jeniffer Howell** ([pdf](#))
- **21. 01. 2021 – foreign subpoena for Edward White** ([pdf](#))
- **21. 01. 2021 – foreign subpoena for Edward White & Co.** ([pdf](#))
- **22. 01. 2021 – Alejandro Romero's deposition**
- **22. 01. 2021 – JD's responses and objections to AH's corrected 10th RFPs** is attachment 3 in in AH's memorandum for motion in support of motion to compel and for relief based on JD's failure to timely produce discovery before the deposition of Tracey Jacobs from 9. 6. 2021, p. 20 – 27 of pdf ([AH-Relief](#)) and attachment 1 in AH's memorandum in support of motion to compel responses to 10th RFPs from 9. 6. 2021, p. 10 – 44 of pdf ([AH-MemoFor10FRPs](#)) ✓
- **22. 01. 2021 – Ben Wizner's declaration** (BeWi 21-01-22 dc) is on p. 48 – 51 of pdf in AH's opposition to JD's motion to deny the remainder of her plea in bar and schedule evidentiary hearing before a jury on the remaining issues from 22. 1. 2021 ([AH-OppToDenyRemainderPleaBar](#)) ✓
 - 1. I am employed by the [ACLU] Foundation in the position of Director of the Speech, Privacy, and Technology Project.
 - 4. Amber Heard is, and was in November 2018, an "ambassador" for the ACLU on Women's Rights.
 - 5. In November 2018, the ACLU suggested Ms. Heard write and assisted her in submitting an Op-Ed piece to *The Washington Post*...
- **22. 01. 2021 – AH's opposition to motion to deny the remainder of AH's plea in bar & schedule evidentiary hearing praecipe** ([pdf](#))
- **22. 01. 2021 – AH's opposition to JD's motion to deny the remainder of her plea in bar and schedule evidentiary hearing before a jury on the remaining issues** ([AH-OppToDenyRemainderPleaBar](#)) ✓
 - article *Amber Heard: I spoke up against sexual violence – and faced our culture's wrath. That has to change.* for the [Washington Post](#) from 18. 12. 2018 (p. 14 – 17 of pdf)
 - *Amber Heard: I spoke up against sexual violence – and faced our culture's wrath. That has to change.* ([Washington Post](#)) (p. 19 of pdf)
 - p. 1 – 2 from AH's combined [motion](#) to dismiss pursuant to va. code § 8.01-265(i) and plea in bar from 11. 4. 2019 (p. 19 – 22 of pdf)
 - judge White's 2nd [opinion letter](#) from 27. 3. 2020 (p. 23 – 31 of pdf)
 - emails between Ms. Bredehoft and Brown Rudnick from 12. – 14. 1. 2021 (p. 32 – 34 of pdf)
 - emails between Ms. Bredehoft and Mr. Chew from 14. – 15. 1. 2021 (p. 35 – 38 of pdf)
 - judge White's 3rd [opinion letter](#) from 4. 1. 2021 (p. 38 – 47 of pdf)

- declaration of Ben Wizner from 22. 1. 2021 (p. 48 – 51 of pdf)
- **22. 01. 2021 – AH's motion for appointment of a conciliator & motion to compel praecipe** ([pdf](#))
- **22. 01. 2021 – AH's motion for appointment of a conciliator & motion to compel** ([pdf](#))
- **22. 01. 2021 – AH's memorandum in support of her request to appoint conciliator and motion to compel contact information for witnesses identified in discovery** is on p. 4 – 8 of pdf in her request to appoint conciliator and motion to compel contact information for witnesses identified in discovery from 22. 1. 2021 ([AH-MotForWitnessContacts](#)) ✓
- **22. 01. 2021 – AH's request to appoint conciliator and motion to compel contact information for witnesses identified in discovery** ([AH-MotForWitnessContacts](#)) ✓
 - AH's memorandum in support of her request to appoint a conciliator in this action and motion to compel contact information for witness interrogatory from 22. 1. 2021 (p. 4 – 8 of pdf)
 - rules from revised fairfax manual (p. 9 – 11 of pdf)
 - p. 9 – 12 from JD's responses and objections to AH's 1st ROG's from 28. 10. 2019 (p. 12 – 19 of pdf)
 - emails between Ms. Bredehoft and Mr. Chew from 12. to 19. 1. 2021 (p. 20 – 27 of pdf)
- **22. 01. 2021 – Benjamin Wizner's declaration** (BeWi 21-01-22 dc), ACLU employee, is exhibit 17 in affirmation of Jessica Meyers in support of JD's petition to compel response to out-of-state subpoenas for ACLU from 10. 5. 2021 ([exh. 17](#))
- **22. 01. 2021 – JD's answer and grounds of defense** ([pdf](#)) ✓
- **25. 01. 2021 – Benjamin Chew's declaration regarding attorneys' fees** ([pdf](#))
- **26. 01. 2021 – JD's reply memorandum in support of motion to deny remainder of AH's plea in bar** ([JD-MemoDenyRemainderPleaBar](#)) ✓
 - judge White's 2nd [opinion letter](#) from 27. 3. 2020 (p. 7 – 16 of pdf, exh. A)
 - judge White's 3rd [opinion letter](#) from 4. 1. 2021 (p. 18 – 28 of pdf, exh. B)
- **26. 01. 2021 – AH's 11th RFPs** are extracted from JD's responses and objections to AH's 11th RFPs from 16. 2. 2021 which are on p. 9 – 122 of pdf in AH's memorandum in support of motion to compel responses to 11th and 12th RFPs from 24. 11. 2021 ([AH-MemoFor11+12RFPs](#)) ✓
 - 1. + 13. – 14. all contracts and communications related to JD's role in any POTC, The Longe Ranger, Mortdecai, Black Mass, Alice Through the Looking Glass, Fantastic Beasts films, Murder on the Orient Express, City of Lies, The Professor, Waiting for the Barbarians, Minamata, Beetlejuice 2, Puffins
 - 2. any contracts or agreements between JD and Disney
 - 15. – 17. all communications and documents between JD and any of his agents, managers, talent, commercial representative, film studio, production company, marketing company, or advertising agency, related to any films, commercials, tv series, promotional or marketing opportunities that JD did not receive, from 18. 12. 2018 onwards
 - 18. documents about all JD's charitable donations from 1. 1. 2016 onwards
 - 19. – 33. everything related to JD's Defenses (this also aims at Adam Waldman)

- 34. – 44. + 46. – 60. + 62. + 65. – 66. + 68. – 70. + 72. – 84. everything related to JD's denials of AH's counterclaim
- 45., 61., 63. – 64. everything related to Adam Waldman's statements
- 67. everything related to JD's statement "[JD] admits that his first video message on Instagram made reference to [AH] and this lawsuit" [is this reference to "On a more personal note, thank you for your kindness, your unwavering support and your strength over these years.", or Johnny Depp joins Instagram with 8 minute long video hinting at Amber Heard conflict: 'Thank you for you unwavering support over the years' by David Lawrence & Heidi Parker for [Daily Mail](#) from 16. 4. 2020, 20:29 GMT? because if that is what AH is whining about, I mean, come on]
- 71. everything related to a stement concerning the Op-Ed
- **27. 01. 2021 – foreign subpoena for Eric George** ([pdf](#))
- **27. 01. 2021 – order denying AH adjudication of attorneys' fees** ([pdf](#)) ✓
- **28. 01. 2021 – AH's detailed discovery deficiency communication**
- **28. 01. 2021 – subpoena for Adam Waldman**
- **28. 01. 2021 – Tracey Jacobs' deposition's** p. 85 – 86, 162 and 219 are attachment 7 in AH's memorandum for motion in support of motion to compel and for relief based on JD's failure to timely produce discovery before the deposition of Tracey Jacobs from 9. 6. 2021, p. 389 – 393 of pdf ([AH-Relief](#)) ✓
 - Were you involved at all in the negotiation of the Christian Dior contract with Mr. Depp? -- Yes. But it was... Lisa Jacobson... (p. 86)
- **01. 02. 2021 – AH's opposition to JD's attorneys' fees declaration** ([pdf](#))
- **02. 02. 2021 – Melanie Inglessis' deposition**
- **03. 02. 2021 – consent motion to admit pro hac vice Leo J. Preslado** ([pdf](#))
- **03. 02. 2021 – foreign subpoena for Bianca Butti** ([pdf](#), [pdf](#))
- **03. 02. 2021 – foreign subpoena for Tasya van Ree** ([pdf](#), [pdf](#))
- **03. 02. 2021 – meet & confer**
- **04. 02. 2021 – AH's 4th RFAs** are extracted from JD's responses and objections to her 4th RFA's from 25. 5. 2021 which are attachment 8 in AH's memorandum for motion in support of motion to compel and for relief based on JD's failure to timely produce discovery before the deposition of Tracey Jacobs from 9. 6. 2021 ([AH-Relief](#)) ✓
 - they all have to do with Tracey Jacobs, JD's former talent agent
 - 23. memorandum of agreement for "Pirates of the Caribbean" from 7. 8. 2002
 - 31. memorandum of agreement for "Alice in Wonderland" from 28. 8. 2008
- **04. 02. 2021 – foreign subpoena for ACLU Foundation** ([pdf](#), [pdf](#))
- **04. 03. 2021 – foreign subpoena for Elon Musk** ([pdf](#))
- **04. 02. 2021 – foreign subpoena for Anthony Romero** ([pdf](#), [pdf](#))
- **04. 02. 2021 – foreign subpoena for Benjamin Wizner** ([pdf](#), [pdf](#))
- **05. 02. 2021 – consent motion to admit pro hac vice Jessica Meyers** ([pdf](#))
- **05. 02. 2021 – JD's motion to present audivisual testimony praecipe** ([pdf](#), [pdf2](#))
- **05. 02. 2021 – JD's motion for leave of court to present audiovisual testimony** ([JD-AudioTest](#), [pdf2](#))

- **05. 02. 2021** – JD's memorandum in support of motion for audiovisual testimony ([JD-MemoAudioTest, pdf2](#)) ✓
- **?? 02. 2021** – JD's motion to compel documents responsive to his 4th RFPs (pdf)
- **05. 02. 2021** – consent motion to admit Jessica Meyers as JD's counsel ([pdf](#))
- **08. 02. 2021** – AH's 12th RFPs, some are extracted from JD's responses and objections to AH's 12th RFPs from 1. 3. 2021 which are on p. 123 – 134 of pdf in AH's memorandum in support of motion to compel responses to 11th and 12th RFPs from 24. 11. 2021 ([AH-MemoFor11+12](#)) ✓
 - 1. all contracts or communications related to Christian Dior from 2010 onwards
 - 2. – 6. all docs relating to denials from AH's 1st, 2nd, 3rd, 4th and 5th RFAs
 - 7. – 8. all related to any responses to AH's 1st and 2nd ROGs
 - 9. all regarding JD's charity donations from 2010 onwards
- **08. 02. 2021** – subpoena for Anthony Romero ([pdf](#))
- **08. 02. 2021** – subpoena for ACLU' Corporate Designee ([pdf](#))
- **08. 02. 2021** – subpoena for Whitney Henriquez ([pdf](#))
- **08. 02. 2021** – subpoena for ACLU ([pdf](#), [pdf](#))
- **10. 02. 2021** – AH's 5th RFAs are extracted from JD's responses and objections to AH's 5th RFAs from 3. 3. 2021 which p. 9 – 24 are on p. 298 – 317 of pdf in AH's memorandum in support of motion to compel responses to 11th and 12th RFPs from 24. 11. 2021 ([AH-MemoFor11+12](#)) ✓
 - 1. admit that article *The Trouble With Johnny Depp* by Stephen Rodrick for [Rolling Stone](#) from 21. 6. 2018, 11:51 ET is genuine
 - 2. admit that [UK judgement](#) from 2. 11. 2020 is genuine
 - 3. admit that article *Apparently Drunk Johnny Depp Cut Off at a Hollywood Film Awards Ceremony* for [The Guardian](#) from 15. 11. 2014 is genuine
 - 4. admit that article *Johnny Depp Is On His Way To Becoming The Most Overpaid Actor in Hollywood* by Dorothy Pomerantz for [Forbes](#) from 23. 1. 2015, 7:32 EST is genuine
 - 5. admit that article *Has Johnny Depp Become Hollywood's Biggest Joke?* by Kyle Smith for [New York Post](#) from 24. 1. 2015, 11:36 is genuine
 - 6. admit that article *Mortdecai Review: Johnny Depp Reaches an Irreversible Tipping Point of Awfulness* by Donald Clarke for [Irish Times](#) from 26. 1. 2015, 12:33 is genuine [I don't get it why people don't like this film, it's funny and witty, and much better then the standard hollywood 'comedy']
 - 7. admit that article *What Happened to Johnny Depp* by Reed Tucker for [New York Post](#) from 11. 9. 2015, 16:41 is genuine
 - 8. admit that article *Johnny Depp: Friends And Family Seriously Concerned About Him, Here's Why* by Elizabeth Gail for [Inquisitr](#) from 7. 5. 2016 is genuine
 - 9. admit that article *CAA Signs Johnny Depp, Ending Long Run at UTA* by Mike Fleming Jr for [deadline](#) from 27. 10. 2016, 9:00 is genuine
 - 10. admit that article *Johnny Depp Sepnt \$3m Blasting Hunter S Thompson's Ashes from Cannon, Ex-Managers Claim* for [The Guardian](#) from 1. 2. 2017 is genuine

- 11. admit that article *Johnny Depp: A Star in Crisis and the Insane Story of His 'Missing Millions'* by Stephen Galloway & Ashley Cullins for [Hollywood Reporter](#) from 10. 5. 2017 is genuine
- 12. admit that article *Johnny Depp's Financial Woes Might Sink the Next Pirates of the Caribbean* by Yohana Desta for [Vanity Fair](#) from 10. 5. 2017 is genuine
- 13. admit that tweet by Donald Trump Jr. from 23. 6. 2017, 21:04 is genuine
- 14. admit that article *White House Condemns Johnny Depp's Presidential Assassination Remark: Sad* by Lisa de Moraes for [Deadline](#) from 23. 6. 2017, 10:00 is genuine
- 15. admit that your quote "I'm not an actor. I lie for a living." is genuine [this is from the speech at the Glastonbury Festival, published in *Johnny Depp: 'When Was the Last Time and Actor Assassinated a President?'* by Ryan Reed for [Rolling Stone](#) from 23. 6. 2017, 13:53, also implied in the [interview](#) for POTC2 posted by Reba Merrill (16. 5. 2015)]
- 16. admit that article *#FireDepp Trends on Twitter as Outrage Mounts for Disney to Fire an Apologetic Johnny Depp* by Max Cohen for [Inquisitr](#) from 24. 6. 2017 is genuine
- 17. admit that article *Trump's Family Hits Back at Johnny Depp's Assassination Joke* by Avi Selk for [The Sydney Morning Herald](#) from 25. 6. 2017, 2:38 is genuine
- 18. admit that article *Johnny Depp Allegedly Showed Up Drunk to Movie Premiere, Reports Say* for [Fox News](#) from 4. 11. 2017 is genuine
- 19. admit that article *Vodka for Breakfast, 72-hour Drug Binges and Spending Sprees that Beggar Belief: Alison Boshoff Reveals Why Hollywood's Reeling Over What's Being Called Johnny Depp's Career Suicide Note* by Alison Boshoff for [Daily Mail](#) from 22. 6. 2018, 00:26 GMT is genuine
- 20. admit that article *Johnny Depp Sued for Allegedly Punching Crew Member on Film Set* by Clarisse Loughrey for [Independent](#) from 10. 7. 2018, 8:14 is genuine
- 21. admit that article *Pirates of the Caribbean is Getting a Reboot (Yes, Reboot) from the Deadpool Writers* by Yohana Desta for [Vanity Fair](#) from 24. 10. 2018 is genuine
- 22. admit that article *Hide the Rum! Johnny Depp is Out as Jack Sparrow in Disney's Pirates of the Caribbean Film Franchise as Actor Battles Financial Issues and Personal Drama* by Ryan Parry & James Desborough for [Daily Mail](#) from 25. 10. 2018, 19:29 GMT is genuine
- 23. admit that article *Johnny Depp 'Dropped from Pirates of The Caribbean'* for [skynews](#) from 27. 10. 2018, 6:55 is genuine
- 24. admit that article *Is Johnny Depp's Career Reaching It's End?* by Robbie Collin for [Golf News](#) from 20. 11. 2018, 9:52 is genuine
- 10. 02. 2021 – affidavit of service ([pdf](#))
- 11. 02. 2021 – JD's opposition to appointment of conciliator and motion to compel praecipe ([pdf](#))
- 11. 02. 2021 – JD's opposition to AH's request to appoint a conciliator and motion to compel contact information for witnesses identified in discovery ([pdf](#)) ✓
- 12. 02. 2021 – agreed order adding Mr. Preslado to JD's counsel ([pdf](#)) ✓

- **12. 02. 2021** – agreed order adding Ms. Meyers to JD's counsel ([pdf](#)) ✓
- **12. 02. 2021** – JD's motion to compel praecipe ([pdf](#))
- **12. 02. 2021** – JD's memorandum in support of motion to compel AH's further responses without objections and production of documents in response to 4th RFPs ([JD-MemoFurtherRespons4RFPs](#)) ✓
 - JD's 4th RFPs from 29. 12. 2020 (p. 9 – 25 of pdf, exh. 1)
 - AH's responses and objections to JD's 4th RFPs from 19. 1. 2021 (p. 27 – 113 of pdf, exh. 2)
 - email from Ms. Vasquez to Ms. Bredehoft from 25. 1. 2021 (p. 115 – 116 of pdf, exh. 3)
- **12. 02. 2021** – JD's 7th RFPs are attachment 1 in his memorandum in support of motion to compel AH's production of original devices and operating system drives and cloud backups of these original devices as requested in JD's 7th RFPs from 24. 9. 2021, p. 9 – 21 of pdf ([JD-MemoDeviceDriveCloud](#)) ✓
 - 1. all communications with anyone within a week before or after the dates of the incidents, incl. these dates: 1. 1. 2013, 8. 3. 2013, 24. 5. 2014, 17. 8. 2014, 17. 12. 2014, 25. 1. 2015, 3. 2015, 8. 2015, 26. 11. 2015, 15. 12. 2015, 21. 4. 2016, 21. 5. 2016.
 - 2. all photos of AH within the same time scope as above
 - 3. all audio or visual recordings of JD and/or AH
 - 4. all docs and comms related to JD or AH claims and defenses
 - 5. access to all mobile devices
 - 6. access to all computers (and their system drives)
 - 7. access to cloud backups for any mobile devices or computers
 - 8. physical extraction or advaced logical extraction of all devices
 - 9. extraction through hardware write-blocker and in raw format of all devices
 - 10. forensic imaging of all devices
 - 11. all photos, audios and videos produced by AH in native format
 - 12. docs showing dates and amounts of any monetary payments, gifts, or transfers from AH to or for benefit of any person identified by AH in discovery
- **16. 02. 2021** – AH's expert witness designation
- **16. 02. 2021** – foreign subpoena for iO Tillet Wright ([pdf](#), [pdf](#))
- **16. 02. 2021** – foreign subpoena for CHLA ([pdf](#))
- **16. 02. 2021** – JD's motion to compel praecipe ([pdf](#))
- **?16. 02. 2021** – JD's responses and objections to AH's 11th RFPs are on p. 9 – 122 of pdf in AH's memorandum in support of motion to compel responses to 11th and 12th RFPs from 24. 11. 2021 ([AH-MemoFor11+12RFPs](#)) ✓
- **17. 02. 2021** – JD's motion to compel praecipe ([pdf](#))
- **19. 02. 2021** – AH's opposition to motion to present audiovisual testimony praecipe ([pdf](#))
- **19. 02. 2021** – AH's opposition to motion to present audiovisual testimony ([AH-OppAudiovisualTestim](#)) ✓
 - [scheduling order](#) from 3. 12. 2020 (p. 9 – 11 of pdf)

- p. 9 – 12 from JD's responses and objections to AH's 1st ROGs from 28. 10. 2019 (p. 12 – 19 of pdf)
- index to UK trial testimony (p. 20 of pdf)
- emails between Brown Rudnick and Charles Bredehoft from 3. 2. 2021 (p. 21 – 23 of pdf)
- **19. 02. 2021 – order denying AH's request to appoint conciliator** ([pdf](#)) ✓
- **22. 02. 2021 – JD's 3rd supplement responses and objections to AH's 1st ROGs** are attachment 7 in AH's memorandum in support of motion to compel responses to 10th RFPs from 9. 6. 2021, p. 164 – 175 of pdf ([AH-MemoFor10FRPs](#)) ✓
 - they contain personal information of JD's witnesses which AH doxed to the world in her memorandum
- **22. 02. 2021 – dr. David Kipper's deposition's** (DaKi 21-02-22 dp) p. 55 – 57, 78 , 97 – 98, and 185 are exhibit A in AH's foreign subpoena for dr. David Kipper from 1. 10. 2021 ([pdf](#)), and p. 163 – 167 are on p. 177 – 183 of pdf (attachement 8) in AH's memorandum in support of motion to compel responses to 10th RFPs from 9. 6. 2021, p. 164 – 175 of pdf ([AH-MemoFor10FRPs](#)) ✓
 - If those drug tests had been positive for medications or a substance he wasn't getting from us professionally, we would not have proceeded. (p. 56)
 - Would drug tests for Mr. Depp from 2014 and 2015, would those also be kept electronically? -- No. (p. 57)
 - 8/20/14. -- Yes, we were now back in Los Angeles. (p. 78)
- **22. 02. 2021 – notice of AH taking Mr. Waldman's deposition on 6. 4. 2021** ([pdf](#))
- **22. 02. 2021 – foreign subpoena for Whitney Henriquez** ([pdf](#))
- **22. 02. 2021 – subpoena for Adam Waldman** ([pdf](#), [pdf](#), [pdf](#))
- **22. 02. 2021 – application to appear pro hac vice for Samuel A. Moniz** ([pdf](#))
- **23. 02. 2021 – order** ([pdf](#)) ✓
- **23. 02. 2021 – order** ([pdf](#)) ✓
- **23. 02. 2021 – praecipe** ([pdf](#))
 - JD has already provided contact information for 76 witnesses, all of which addresses AH already had from UK, plus he added 13 additional persons
- **24. 02. 2021 – motion to admit pro hac vice Samuel Moniz as co-counsel for JD** ([pdf](#))
- **24. 02. 2021 – order declining to deny AH's plea in bar for anti-SLAPP immunity before trial**
- **25. 02. 2021 – JD's responses and objections to AH's 4th RFPs** are attachment 8 in AH's memorandum for motion in support of motion to compel and for relief based on JD's failure to timely produce discovery before the deposition of Tracey Jacobs from 9. 6. 2021, p. 395 – 438 of pdf ([AH-Relief](#)) ✓
- **26. 02. 2021 – Jennifer Howell's deposition I**
- **01. 03. 2021 – Michele Mulrooney's deposition**
- **01. 03. 2021 – JD's responses and objections to AH's 12th RFPs's** p. 11 – 18 are on p. 123 – 134 of pdf in AH's memorandum in support of motion to compel responses to 11th and 12th RFPs from 24. 11. 2021 ([AH-MemoFor11+12](#)) ✓

- **03. 03. 2021** – JD's responses and objections to AH's 5th RFAs's p. 9 – 24 are on p. 298 – 317 of pdf in AH's memorandum in support of motion to compel responses to 11th and 12th RFPs from 24. 11. 2021 ([AH-MemoFor11+12](#)) ✓
- **03. 03. 2021** – meet & confer
- **05. 03. 2021** – agreed order adding Mr. Moniz to JD's counsel ([pdf](#)) ✓
- **08. 03. 2021** – letter informing parties that their case has been assigned to judge Penny Azcarate ([pdf](#))
- **08. 03. 2021** – order regarding schedule ([pdf](#)) ✓
- **08. 03. 2021** – Roberto Lopez' LAPD representative deposition
- **09. 03. 2021** – Armand Lemoyne's LAPD representative deposition
- **11. 03. 2021** – Tyler Hadden's deposition
- **12. 03. 2021** – Marie Sadanaga's LAPD representative deposition
- **12. 03. 2021** – foreign subpoena for Wasser, Cooperman & Mandles ([pdf](#))
- **26. 03. 2021** – order regarding schedule ([pdf](#)) ✓
- **26. 03. 2021** – order awarding JD attorneys' fees ([pdf](#)) ✓
- **25. 03. 2021** – court of appeals confidential annexe (pdf) 3rd attempt to dismiss
- **25. 03. 2021** – court of appeal's confidential judgement (pdf)
- **29. 03. 2021** – AH's motion for reconsideration of Mar 26th order ([pdf](#))
- **30. 02. 2021** – Candie Davidson-Goldbronn CHLA's representative's deposition
- **31. 03. 2021** – Melissa Saenz' deposition
- **31. 03. 2021** – order regarding attorneys' fees ([pdf](#)) ✓
- **05. 04. 2021** – Eric George's deposition ([ErGe 21-04-05 dp](#)) ✓
 - I have known Amber Heard... a good five years... (p. 16)
 - [AH] presented to me a draft of the op-ed, and asked for my counsel in terms of reviewing it, editing it, and finalizing it for publication. (p. 18)
 - I reviewed it and spent some significant time on it to **make sure there would be no meritorious claim** that could be brought against her **in connection with a defamation** or related type of tort claim, and, ideally, with that in mind, **to minimize the possibility of her ever being sued in connection with publishing it.** (p. 27)
 - **And we did, in particular, have in mind Johnny Depp**, and... (p. 29)
 - Amber did have an agreement with Mr. Depp that covered issues about confidentiality. ["NDA"] (p. 46)
 - reference to email from 12. 12. 2018 where Mr. George says: "...minus one sentence..., which too directly raises the issue of the allegations about what you're lying about." (p. 88) [**an interesting sentence. he says it references the stipulated judgement's confidentiality clauses.**]
 - What I'm saying, under oath, is this has nothing to do with Johnny Depp. (p. 203)
 - ...within the narrow scope of time between when I was consulted about the possible op-ed and the publication of the op-ed, **I don't believe we had any such discussion, particularly about this issue of whether or not Mr. Depp had abused her.** (p. 208)

- [some of the emails discussed in the deposition were published in *Johnny Depp's legal battle against the ACLU heats up as emails reveal nonprofit's staff wrote Amber Heard's explosive domestic violence op-ed at the center of his \$50M defamation suit against his ex-wife* by ben Ashford for [Daily Mail](#) from 27. 5. 2021, 13:56: these emails are:
 - [email](#) from Gerry Johnson to Jodi Gottlieb from 6. 11. 2018, 14:22
 - [emails](#) from Jessica Weitz to AH from 29. 11. 2018, 13:12 and from Robin Shulman to AH from 29. 11. 2018, 15:20 (poss. exh. 8)
 - emails from Robin Schulman to Jessica Weitz and AH & from AH's assistant to Jodi Gottlieb & from AH to Mr. George et al., all from 6. 12. 2018 (poss. exh. 3)
 - [email1](#), [email2](#), [email3](#), [email4](#) from Robin Shulman to Sean Walsh and AH with drafts, and from Sean Walsh to AH, and from AH to Sean Walsh and Eric George, from 12. 12. 2018 (poss. exh. 25)
 - [email](#) from Eric George to Robin Shulman, and from Robin Schulman to everyone, from 17. 12. 2018, 11:02 (poss. exh. 32)
 - [email](#) from Sean Walsh to AH & Eric George from 12. 12. 2018, 13:09 with embedded email from AH to Sean Walsh & Eric George from 12. 12. 2018, 10:07 (poss. exh. 54/6)
 - [draft1](#) and [draft2](#) from another email, unknown date
 - AH's arbitration demand from 12. 10. 2018 (poss. exh. 46/13)
 - stipulated judgement of the dissolution of marriage from 13. 1. 2017 (poss. exh. 9)]
- **07. 04. 2021 – Benjamin Chew's declaration regarding attorneys' fees** ([pdf](#))
 - Benjamin Chew's declaration from 25. 1. 2021 (p. 7 – 9 of pdf, att. A)
 - [order](#) from 14. 1. 2021 (p. 11 – 12 of pdf, att. B)
- **08. 04. 2021 – JD's motion to compel praecipe further responses** ([pdf](#))
- **08. 04. 2021 – JD's motion to compel AH's further responses without objections and production of documents in response to 4th RFPs** ([pdf](#))
- **08. 04. 2021 – JD's memorandum to compel AH's further responses without objections and production of documents in response to 4th RFPs** ([JD-Memo-4RFPs](#)) ✓
- **13. 04. 2021 – AH's motion for amended answer and ground of defense, supplemental plea in bar, schedule a hearing, set briefing schedule and stay discovery praecipe** ([pdf](#))
- **13. 04. 2021 – AH's motion for amended answer and ground of defense, supplemental plea in bar, schedule a hearing, set briefing schedule and stay discovery** ([pdf](#))
- **13. 04. 2021 – AH's amended answer and grounds for defense to JD's complaint** ([AH-AmendAnswer](#), [pdf2](#)) ✓
 - the document was reset to this date, its previous date was 10. 8. 2020
 - 1. Defendant states that the op-ed ... reflects a complete and accurate statement of its contents. ... Defendant specifically denies that she defamed Plaintiff or made false statements or implications...
 - 13. Defendant denies that she and Plaintiff were married on February 1, 2015, and states that they were married on February 3, 2015. [huh, why the difference?]
 - 18. Defendant denies that she withdrew her allegations relating to Plaintiff's domestic violence and abuse and denies that her allegations of domestic violence and abuse by Plaintiff are false.

- 37. ...Mr. Wright asked his friend Ms. Shapiro to call 911... two LAPD officers arrived ... at approximately 8:57pm on May 21, 2016, and two additional LAPD officers arrived at approximately 10:24pm on the same day.
- 54. ... surveillance video footage from May 24, 2016 ... states that counsel for Mr. Depp has admitted it does not exist, and they do not possess such footage.
- 65. Defendant admits that she is a Human Rights Champion of the United Nations Office of the High Commissioner for Human Rights, a Woman's Rights Ambassador for the American Civil Liberties Union, and a spokesperson for L'Oréal Paris...
- **13. 04. 2021 – AH's memorandum for amended answer and ground of defense, supplemental plea in bar, schedule a hearing, set briefing schedule and stay discovery ([AH-MemoForPleaBar+StayDiscover](#)) ✓**
 - AH's [amended answer](#) and grounds of defense (p. 9 – 43 of pdf, att. 1)
 - JD's UK particulars of claim from 13. 6. 2018 (p. 44 – 55 of pdf, att. 2)
- **13. 04. 2021 – AH's supplemental plea in bar ([AH-PleaBar](#), [pdf2](#)) ✓**
 - **3rd attempt to dismiss**
 - Ms Heard claims that the UK judgement bars JD's defamation claim against her
 - Ms Heard's claims of being the victim of domestic abuse and sexual violence
 - JD's UK particulars of claim from 13. 6. 2018 (p. 7 – 18 of pdf)
- **13. 04. 2021 – AH's memorandum in support of her motion for leave to file an amended answer & grounds of defense, supplemental plea in bar, request a hearing, briefing schedule, and to stay discovery pending ruling on the plea in bar ([AH-MemoPleaBar](#)) ✓**
 - Because of the UK judgement, the entire world may now say, forever, that Mr. Depp is a "wife beater" and has committed at least 12 acts of domestic violence against Amber Heard, causing her to be in fear for her life. In short, the UK Judgement, now final, permits this Court to end this litigation. (p. 2 of pdf) [**fuck, but if this statement was not written with actual malice...**]
 - AH's [amended answer](#) and grounds of defense from 10. 8. 2020, with the date reset to 13. 4. 2021 (p. 10 – 42 of pdf, att. 1)
 - JD's UK particulars of claim from 13. 6. 2018 (p. 44 – 55 of pdf, att. 2)
- **13. 04. 2021 – AH's notification of judicial notice of adjudicated facts and law impacting this matter ([AH-NoticAdjuFacts](#)) ✓**
 - [UK judgement](#) from 2. 11. 2020 (p. 7 – 135 of pdf, att. A)
 - order denying JD's permission to appeal from 16. 11. 2020 (p. 137 – 139, att. B)
 - [approved judgement](#) from 25. 3. 2021 (p. 141 – 154 of pdf, att. C)
 - order from 31. 3. 2021, amended to 6. 4. 2021 (p. 156 – 157 of pdf, att. D)
- **14. 04. 2021 – AH's opposition to JD's request for attorneys' fees ([pdf](#))**
- **19. 04. 2021 – order re-awarding JD attorneys' fees ([pdf](#)) ✓**
- **22. 04. 2021 – order regarding schedule ([pdf](#)) ✓**
- **22. 04. 2021 – AH's supplemental responses and objections to JD's 4th RFPs** are attachment 1 in her memorandum in opposition to JD's motion to compel AH's further responses without objections and production of documents in response to 4th RFPs from 22. 4. 2021, p. 10 – 101 of pdf ([AH-OppFurtherResponses+4RFP](#)) ✓
 - 1. Ms. Heard does not possess the earlier tax returns [from before 2013]...

- **23. 04. 2021 – AH's opposition to JD's motion to compel praecipe** ([pdf](#))
- **23. 04. 2021 – AH's memorandum in opposition to JD's motion to compel AH's further responses without objections and production of documents in response to 4th RFPs** ([AH-OppFurterResponses+4RFP](#)) ✓
 - AH's supplemental responses and objections to JD's 4th RFPs from 22. 4. 2021 (p. 10 – 101 of pdf, att. 1)
 - emails between Ms. Bredehoft and Mr. Chew from 7. – 8. 4. 2021 (p. 103 – 105 of pdf, att. 2)
 - p. 26, 35, 36, 38 from hearing from 18. 9. 2020 (p. 106 – 112 of pdf, att. 3)
 - p. 25 – 26 from hearing from 18. 12. 2020 (p. 113 – 116 of pdf, att. 4)
 - p. 13 – 14, 17 – 19, 30 from hearing from 20. 11. 2020 (p. 118 – 125 of pdf, att. 5)
 - p. 3 – 4 from JD's [opposition](#) to AH's motion to compel 8th RFPs and tax information from 13. 11. 2020 (p. 126 – 130 of pdf, att. 6)
 - p. 70 – 71, 74 from deposition of Johnny Depp from 10. 11. 2020 (p. 132 – 136 of pdf, att. 7)
 - p. 28 – 29 from AH's responses and objections to JD's 3rd RFPs from 4. 9. 2020 (p. 138 – 142 of pdf, att. 8)
 - emails between Mr. Gilmore, Mr. Roche and Mr. Schwartz, and Brown Rudnick from 13. 8., 21. 8., 26. 8. and 4. 9. 2019 (p. 144 – 149 of pdf, att. 9)
- **30. 04. 2021 – JD's motion to compel documents responsive to his 4th RFPs's transcript of hearing is exhibit A in JD's proposed order from 5. 5. 2021, p. 2 – 109 of pdf** ([JD-ProposOrder](#)) ✓
 - Mr. Chew first appearance for JD
 - AH did produce a million pages of documents, ... but most of this were social media materials ... which are not responsive or particularly helpful (p. 9 of pdf)
 - JD has produced material regarding his career and taxes from 2010 onward (p. 12 of pdf)
 - AH claims she produced her documents regarding ACLU and CHLA by 4. 1. 2021 (p. 16 of pdf)
 - AH is trying to hide behind Eric George, her first lawyer, and ACLU. Eric George ... who she fired after judge White denied her motion to dismiss and transfer based on value (p. 20 of pdf)
 - reply:
 - **AH produced a hard drive with literally over a million documents** (p. 26 of pdf)
 - AH's contracts are Bates stamped 105450 to 81. Those are all of her contracts. [**so, she only had 31 contracts from 2010 to 2021? films, commercials, talk shows, l'oreals? named are Justice League and L'Oréal.**] (p. 27 of pdf)
 - representative of CHLA was deposed after they produced documents (p. 30 of p)
 - CHLA testified that AH gave them just a little bit under a million and that she pledged the 3.5 [**that's new, and I would like to see that testimony, please**] (p. 30 of pdf)
 - LAPD corporate representative said officers Saenz and Hadden had body cam, had it assigned to them, and had downloaded body cam before and after, but somehow not that day (p. 41 of pdf)

- AH produced documents relating to the charitable deductions for ACLU and CHLA [which should have shown what she donated so far, no? then why are we still having this argument?] (p. 49 of pdf)
- CHLA representative said many times in their testimony we don't put limitations on pledges [ok, but I would still like to see the testimony] ... there are a lot of different types of pledges, including ones that you put it in your will [interesting] (p. 50 – 51 of pdf)
- nonprivileged draft op-eds are at Bates stamp numbers 10654 to 876 [that's 222 documents] and privileged are 16281 to 845 [a whopping 564 documents!] (p. 51 – 52 of pdf)
- rebuttal:
- Elon Musk is in fact the anonymous donor [well, there you have it] (p. 56 of pdf)
- Mr. Musk saw her in the week between the alleged abuse and the time she got the ex parte TRO on May 27th of that week. [can we assume then that the undated surveillance video is really from that week and not from some earlier night-time visit? considering the 26-day rewrite of the surveillane, it can't be from before mid-April 2016.]
- [Mr. Musk's] charitable foundation made contributions in her honor (p. 57 of pdf)
- When the CHLA finally produced those documents, Ms. Bredehoft designated them confidential under the protective order. Mr. Depp filed an emergency motion to redesignate those documents because they were needed, and Ms. Bredehoft said there's no emergency here. They don't need those documents in the next few days, and Chief Judge White told us, The emergency here, Mr. [sic!] Bredehoft, is your bad faith. So he granted the emergency motion to redesignate the CHLA documents because he knew they were relefant, and he knew that they weren't confidential. (p. 58 – 59 of pdf)
- we understand that she had communications with her father where it was very clear that she was abused. [I'm not clear who was abused here, AH, Ms. Butti? by AH's father? someone else?] (p. 59 of pdf)
- Because there were no children, there was 15-month marriage, and she knew she wasn't going to get very much, so she alleges abuse. (p. 59 of pdf)
- Ms. Bredehoft deposed those officers [Saenz and Hadden] and they said very clearly they didn't have body cams. They didn't turn them on. (p. 59 of pdf)
- We know the ACLU did no due diligence before they had gotten bad with Ms. Heard. We know the Virginia Press Association ... didn't do any due diligence of Ms. Heard before jumping onto her MeToo cause. ... remember there's Jussie Smollett. (p. 64 of pdf)
- judgement:
- the date we're talking is January 1st, 2020, for documents (p. 66 of pdf)
- Ms. Heard's counsel has represented that she's paying her own attorneys' fees. We believe they're paid by the anonymous donor, Mr. Musk. We'd like to see whether there are any deductions for attorneys' fees on those tax returns. (p. 72 – 73 of pdf)

- Mr. Rottenborn, who is currently still co-counsel for Ms. Heard, represented to Chief Judge White on more than one occasion that in fact she's paying her own attorneys' fees. If that's the truth, it should be reflected on her tax returns as a business deduction. (p. 74 of pdf)
- order pertaining to this hearing from 5. 5. 2021 (p. 110 – of pdf, att.)
- **30. 04. 2021 – hearing's** p. 9 – 10, 21 – 22 and 60 are attachment 3 in AH's memorandum in support of motion to compel responses to 10th RFPs from 9. 6. 2021, p. 54 – 61 of pdf ([AH-MemoFor10RFPs](#)) ✓
- **05. 05. 2021 – JD's proposed order** ([JD-ProposOrder](#), [pdf2](#)) ✓
 - only attachments
 - email from Mr. Chew to judge Azcarate regarding the order from 5. 5. 2021 (p. 1 of pdf)
 - transcript of hearing from 30. 4. 2021 (p. 2 – 109 of pdf)
 - proposed order (p. 110 – 113 of pdf)
- **12. 05. 2021 – order granting JD all but two of 4th RFPs** ([pdf](#)) ✓
- **21. 05. 2021 – JD's opposition to AH's motion for leave to file amended answer and grounds of defense and supplemental plea in bar praecipe** ([pdf](#))
- **21. 05. 2021 – JD's opposition to AH's motion for leave to file amended answer and grounds of defense and supplemental plea in bar** ([pdf](#))
- **21. 05. 2021 – JD's opposition to AH's motion for leave to file an amended answer & ground of defense and supplemental plea in bar** ([JD-OppSupplPleaBar](#)) ✓
 - judge White's 1st [opinion letter](#) from 25. 7. 2019 (p. 8 – 17 of pdf, att. A)
 - judge White's 2nd [opinion letter](#) from 27. 3. 2020 (p. 18 – 26 of pdf, att. B)
 - judge White's 3rd [opinion letter](#) from 4. 1. 2021 (p. 27 – 37 of pdf, att. C)
- **25. 05. 2021 – foreign subpoena for iO Tillet Wright** ([pdf](#))
- **27. 05. 2021 – foreign subpoena for iO Tillet Wright** ([pdf](#))
- **28. 05. 2021 – hearing on plea in bar's** p. 4 – 5 + 32 – 33 + 36 – 37 are in JD's opposition to AH's supplemental plea in bar from 28. 6. 2021, p. 55 – 64 of pdf ([JD-OppPleaBar](#)) ✓
 - the discovery will remain on-going
- **02. 06. 2021 – order granting AH motion for amended answers, supplemental plea in bar and briefing schedule** ([pdf](#)) ✓
- **09. 06. 2021 – AH's motion to compel praecipe** ([pdf](#))
- **09. 06. 2021 – AH's motion to compel responses to 10th RFPs** ([AH-MotFor10RFPs](#))
- **09. 06. 2021 – AH's memorandum in support of motion to compel responses to 10th RFPs** ([AH-MemoFor10RFPs](#)) ✓
 - reference to Johnny Depp's 2018 deposition [excerpt](#) (p. 3)
 - JD's responses and objections to AH's corrected 10th RFPs from 22. 1. 2021 (p. 10 – 44 of pdf, att. 1)
 - p. 3 – 5 of JD's [memorandum](#) in support of motion to compel AH's further responses without objections and production of documents in response to 4th RFPs from 8. 4. 2021 (p. 46 – 52 of pdf, att. 2)

- p. 9 – 10, 21 – 22, 60 from hearing from 30. 4. 2021 (p. 54 – of pdf, att. 3)
- Infinitum Nihil & L.R.D. Productions & Scaramanga Bros incomes for 2009 – 2020 (p. 63 – 114 of pdf, att. 4)
- p. 65 – 67, 70, 73, 124 – 132, 160 – 173, 182 – 183, 193 – 194, 197 – 198, 221 from deposition of Tracey Jacobs from 30. 5. 2018 (p. 116 – 157 of pdf, att. 5)
- emails from The Wrap to Tracey Jacobs then to Christi Dembrowski from 15. 11. 2014, emails between Tracey Jacobs and Christi Dembrowski from 26. and 27. 2. 2015 (p. 158 – 163 of pdf, att. 6)
- JD's 3rd supplemental responses and objections to AH's 1st ROGs from 22. 2. 2021 (p. 164 – 175 of pdf, att. 7)
- p. 163 – 167 from deposition of David Kipper from 22. 2. 2021 (p. 177 – 183 of pdf, att. 8)
- p. 33 from hearing from 24. 7. 2020 (p. 185 – 187 of pdf, att. 9)
- p. 618 – 619, 648 – 652 from deposition of Johnny Depp from 12. 11. 2020 (p. 189 – 198 of pdf, att. 10)
- p. D-8 from fairfax bar association practice manual from 2018 (p. 199 – 200 of pdf, att. 11)
- **09. 06. 2021 – AH's motion to compel and for relief precipe** ([pdf](#))
- **09. 06. 2021 – AH's motion to compel and for relief** ([pdf](#))
- **09. 06. 2021 – AH's memorandum for motion in support of motion to compel and for relief based on JD's failure to timely produce discovery before the deposition of Tracey Jacobs** ([AH-Relief](#), [pdf2](#)) ✓
 - Tracey Jacobs has been JD's agent for 30 years (p. 2 of pdf)
 - JD's responses and objections to AH's 8th RFPs from 9. 9. 2020 (p. 10 – 14 of pdf, att. 1)
 - p. 15 – 16 of transcript from hearing from 20. 11. 2020 (p. 16 – 19 of pdf, att. 2)
 - JD's responses and objections to AH's corrected 10th RFPs from 22. 1. 2021 (p. 21 – 27 of pdf, att. 3)
 - email from Mr. Blair to Mr. Chew with a link to JD's documents from 28. 1. 2021 (p. 29 of pdf, att. 4)
 - CA deposition of Tracey Jacobs from 30. 5. 2018 (p. 32 – 252 of pdf, att. 5)
 - CA deposition of Tracey Jacobs from 13. 5. 2019 (p. 255 – 387 of pdf, att. 6)
 - p. 85 – 86, 162 and 219 from CA deposition of Tracey Jacobs from 28. 1. 2021 (p. 389 – 393 of pdf, att. 7)
 - JD's responses and objections to AH's 4th RFPs from 25. 2. 2021 (p. 395 – 438 of pdf, att. 8)
- **14. 06. 2021 – AH's memorandum in support of supplemental plea in bar** ([AH-MemoSupplemPleaBar](#)) ✓
 - p. 396 – 401, 407 from deposition of Johnny Depp from 11. 11. 2020 (p. 35 – of pdf)
 - JD's UK particulars of claim from 13. 6. 2018 (p. 48 – 59 of pdf)
- **17. 06. 2021 – Benjamin Chew's declaration** (BeCh 21-06-17 dc) is on p. 12 – 14 of pdf in JD's opposition to motion to compel and for relief on failure to timely produce discovery before deposition of Tracey Jacobs from 17. 6. 2021 ([JD-OppRelief](#)) ✓

- JD's complaint in TMG Action from 26. 5. 2017 (p. 15 – 67 of pdf, exh. 1)
- JD's [complaint](#) from the Bloom Action from 17. 10. 2017 (p. 68 – 92 of pdf, exh. 2)
- p. 30 – 31 from hearing on AH's motion to compel 8th RFPs from 20. 11. 2020 (p. 93 – 95 of pdf, exh. 3)
- p. 22 from hearing from 28. 5. 2021 (p. 96 of pdf, exh. 4)
- emails between Brown Rudnick and Ms. Bredehoft from 2. – 8. 6. 2021 (p. 98 – 109 of pdf, exh. 5)
- p. 109 – 125, 217 from deposition of Tracey Jacobs from (p. 110 – 128 of pdf, exh. 6)
- **17. 06. 2021 – Camille Vasquez's declaration** (CaVa 21-06-17 dc) is on p. 129 – 131 of pdf in JD's opposition to motion to compel and for relief on failure to timely produce discovery before deposition of Tracey Jacobs from 17. 6. 2021 ([JD-OppRelief](#)) ✓
- **17. 06. 2021 – JD's opposition to motion to compel and for relief praecipe** ([pdf](#))
- **17. 06. 2021 – JD's opposition to motion to compel and for relief on failure to timely produce discovery before deposition of Tracey Jacobs** ([JD-OppRelief](#)) ✓
 - article *Johnny Depp scores victory in court in lengthy legal battle against ex-lawyer* by Sasha Savitsky for [Fox News](#) from 28. 8. 2018 (p. 8 of pdf)
 - article *Johnny Depp Gets '8-Figure' Settlement in Fee Brawl With Bloom Hergott* by David Thomas for [law.com](#) from 31. 10. 2019, 18:09 (p. 9 – 11 of pdf)
 - declaration of Benjamin Chew, with exhibits, from 17. 06. 2021 (p. 12 – 128 of pdf)
 - declaration of Camille Vasquez from 17. 6. 2021 (p. 129 – 130 of pdf)
- **???? – Vince Jolivette's declaration** (ViJo ??-??-?? [dc1](#), [dc2](#), [html](#)) [*it was written before 21. 6. 2021 when it appeared on [youtube](#) and [twitter](#)*]
 - 2. In 2016 we shared offices with the charity The Art of Elysium at the time Whitney Heard was working there.
 - 3. Whitney Heard and I became friends and then dated in the summer of 2017. She was an extremely hard worker, smart, easy to talk to and nice.
 - 4. During a conversation we had in the Spring of 2016, I asked Whitney why she had moved in with Jennifer Howell, the founder of The Art of Elysium (and who lived two floors above my office). She relayed to me a story about having to stop her sister Amber from [attacking] Johnny and in the process how Amber almost knocked her down a flight of stairs. [*Whitney moved out in 2015, so the year is wrong?*]
- **21. 06. 2021 – stipulated amended protective order** ([ProtectOrder](#), [pdf2](#)) ✓
 - protected are: personally identifying information, medical records, private journals/entries, confidential schedules from the UK, UK confidential judgement, UK court of appeal confidential judgement, UK confidential trial transcripts, sections of Kirstina Sexton's deposition from 18. 12. 2019, texts between AH and Danie Streisand from 16. 11. 2018
- **25. 06. 2021 – JD's opposition to motion to compel praecipe** ([pdf](#))
- **25. 06. 2021 – JD's opposition to AH's motion to compel responses to her 10th RFPs** ([JD-Opp10RFP](#), [pdf2](#)) ✓
 - Ms. Heard publicly filed this 52-page third party production [of profit & loss statements and income statements over a ten-year period], which was designated

- "Confidential", in an utterly unnecessary public exposure of Mr. Depp's personal financial information, which constitutes a violation of the Protective Order. (p. 2)
- Mr. Depp agreed to produce and is believed to have completed production of recordings of Ms. Heard. (p. 4)
 - emails between Mr. Moniz, Mr. Chew and Ms. Bredehoft regarding various RFPs, Tracey Jacobs' deposition and anticipated motions from 4., 7., 8., 10. and 24. 6. 2021 (p. 8 – 20 of pdf)
 - p. 30 – 31 of transcript of hearing from 20. 11. 2020 (p. 21 – 24 of pdf)
 - JD's 1st amended complaint against Mandel Company from 26. 5. 2017 (p. 25 – 77 of pdf)
 - JD's [complaint](#) against Bloom Hergott Diemer etc. from 17. 10. 2017 (p. 78 – 103 of pdf)
- **28. 06. 2021 – JD's motion for sanctions related to AH supplemental plea in bar ([pdf](#))**
 - **28. 06. 2021 – JD's opposition to AH's supplemental plea in bar ([JD-OppPleaBar,pdf2](#))✓**
 - [AH wants to] dismiss this case based on a judgement rendered in a different country, with different disclosure and evidentiary rules, between different parties, where she was not a party [but a third-party witness] and was not subject to discovery on that court's authority. (p. 1)
 - Because Ms. Heard was not a party to the UK action she was not only able to decide what materials to provide or withhold, but... also able to control the timing of her selective disclosures. Indeed, Ms. Heard waited to disclose critical, and seemingly incomplete or modified, audio recordings, photographs, and text messages until the eve of the trial in the UK Action and, in some instances, after the UK Trial was underway. (p. 4)
 - ...Mr. Depp was aggressively pursuing party and non-party discovery... including,... seeking discovery concerning Ms. Heardps purported donation of her entire divorce settlement to charity that she testified to in her witness statement in the UK Action; requesting the production of Ms. Heard's electronic devices for a forensic analysis of the metadata associated wit the texts, photographs, and videos Ms. Heard relied upon... (p. 5 – 6)
 - In rejecting Mr. Depp's theory that Ms. Heard's claims of abuse were a "hoax" and "insurance policy" to protect her financially in the event that their marriage broke down, ... Nicol cited Ms. Heard's testimony that she had donated her entire divorce settlement to charity... This finding is based on, what has now been revealed to be, false testimony from Ms. Heard. (p. 6)
 - Only after the UK Judgement was rendered did the outstanding discovery Mr. Depp had been actively pursuing start rolling in. (p. 7)
 - ...the UK Court of Appeal recognized that Ms. Heard has mislead the UK Court by testifying in her witness statement that her entire \$7 million divorce settlement "was donated". (p. 8)
 - 3rd UK [witness statement](#) of Amber Heard from 26. 2. 2020 (p. 30 – 37 of pdf)
 - p. 1 – 3 + 108 – 111 of a transcript of UK hearing from 26. 2. 2020 (p. 38 – 39 of pdf)
 - par. 24 – 29 from [UK judgement](#) from 26. 2. 2020 (p. 40 – 43 of pdf)

- par. 31 – 64 from [UK judgement](#) from 2. 7. 2020 (p. 43 – of pdf)
- UK order refusing JD's request that AH should not be present at trial until she is called to give evidence, from 6. 7. 2020 (p. 49 – 51 of pdf)
- par. 1 – 4 + 40 – 43 of [UK judgement](#) from 25. 3. 2021 (p. 52 –54 of pdf)
- p. 4 – 5 + 32 – 33 + 36 – 37 of the transcript of hearing on the plea in bar from 28. 5. 2021 (p. 55 – 64 of pdf)
- emails between Ms. Bredehoft and Mr. Chew from 8. and 12. 4. 2021 (p. 65 – 68 of pdf)
- **29. 06. 2021 – order denying AH motion regarding Tracey Jacobs ([pdf](#)) ✓**
- **02. 07. 2021 – order granting AH Tracey Jacob's video deposition ([pdf](#)) ✓**
- **07. 07. 2021 – AH's 2nd notification of judicial notice of adjudicated facts and law ([AdjuFacts2](#), [pdf2](#)) ✓**
 - this deals with confidential documents
 - 3rd witness statement of Louis Charalambous from 19. 2. 2020 (p. 6 – 32 pdf, att. 1)
 - transcript of UK part proceedings from 29. 6. 2020 (p. 34 – 71 of pdf, att. 2)
 - [judgement](#) about JD's relief against sanctions and refusal for third-party disclosure order against AH from 29. 6. 2020 (p. 74 – 84 of pdf)
 - p. 73 – 74 + 266 from JD's deposition from 10. 11. 2020 (p. 86–90 pdf)
 - email regarding AH's waiver of ½ interest in the back-end of POTC 5 etc from 6. 8. 2016 (p. 91 – 92 of pdf) [AH is advised that she is giving up on a lot of money if she waives back-end deals from JD's projects during the marriage. her attorney Samantha Spector is under the impression that AH is going to waive her right to that money. a waiver form is attached, but it is unsigned and undated.]
 - [letter](#) from Mr. White, JD's accountant, to CHLA about a cheque for \$100,000 from 24. 8. 2016 (p. 94 of pdf)
 - transcript of [hearing](#) from 18. 12. 2020 (p. 96 – 100 of pdf)
- **07. 07. 2021 – AH's opposition to motion for sanctions related to supplemental plea in bar ([pdf](#))**
- **07. 07. 2021 – AH's notice of intent to use protected information ([pdf](#), [pdf2](#))**
- **07. 07. 2021 – AH's reply memorandum in support of supplemental plea in bar ([pdf](#)) ✓**
- **22. 07. 2021 – hearing's p. 92 is attachment 1 in AH's reply memorandum in support of motion to certify Aug 17th order for interlocutory appeal from 6. 10. 2021, p. 10 – 15 of pdf ([AH-ReplMemoInterlocApp](#)) ✓**
 - The facts underlying the two actions are also related in time and space. **The Op-Ed in the *Washington Post* both adress Heard's allegations of domestic violence and abuse by Depp during their relationship**, which became public with her filing for divorce and obtaining a Domestic Violence Restraining Order in May 2016. The publications serve readers worldwide, maintaining websites accessible all over the world. (p. 8)
- **24. 07. 2021 – AH's 7th RFPs**
- **30. 07. 2021 – praecipe regarding JD being granted subpoenas to ACLU with exception to AH's ambassador role ([pdf](#))**

- order from New York court (p. 3 – 4 of pdf)
- **03. 08. 2021 – AH's 13th RFPs** are extracted from JD's responses and objections to AH's 13th RFPs from 24. 8. 2021, whose p. 17 – 18 are attachment 12 in AH's opposition to JD's motion to compel production of original devices and operating system drives and cloud backups of these original devices as requested in JD's 7th RFPs from 22. 10. 2021, p. 93 – 96 of pdf ([AH-OppForensEvid](#)) ✓
- **06. 08. 2021 – consent order that JD shall produce non-privileged documents to certain requests of 10th RFPs** ([pdf](#)) ✓
- **10. 08. 2021 – order denying JD's emergency motion** to quash subpoena to Adam Waldman
- **17. 08. 2021 – judge Azcarate's opinion letter and order** ([Azcarate-OpLetter](#), [pdf2](#)) ✓
 - Although the claims are similar in the sense they both relate to claims of abuse by Plaintiff, the statements being defended in the UK case are inherently different than the statements published by Defendant. Therefore, given Virginia's narrow construction of privity, Defendant and *The Sun* are not in privity. (p. 3 of pdf)
 - However, even if an exception to mutuality applied, **the Court is not persuaded by Defendant's argument that Plaintiff had a full and fair opportunity to litigate the UK Action. Defendant was not a party in the UK action and was not treated as one. Because she was not a named defendant, she was not subject to the same discovery rules applicable to named parties.** In fact, Defendant *could not* have been a named defendant to the UK litigation because her allegedly defamatory statements were made *after* the UK action commenced. (p. 5 of pdf)
 - To enforce the UK defamation judgement in this case would go against public policy. Therefore, comity is inappropriate in this instance and does not serve to bar Plaintiff from arguing his case before a jury in the Commonwealth. (p. 9 of pdf)
- **17. 08. 2021 – JD's responses and objections to AH's 7th RFPs**
- **19. 08. 2021 – order that JD shall produce documents to revised Nos. 5, 6, 20 of 10th RFPs** ([pdf](#)) ✓
- **24. 08. 2021 – JD's responses and objections to AH's 13th RFPs's** p. 17 – 18 are attachment 12 in AH's opposition to JD's motion to compel production of original devices and operating system drives and cloud backups of these original devices as requested in JD's 7th RFPs from 22. 10. 2021, p. 93 – 96 of pdf ([AH-OppForensEvid](#)) ✓
- **2021 – AH's interlocutory appeal**
 - **4rd attempt to dismiss**
- **30. 08. 2021 – order regarding schedule for AH's interlocutory appeal** ([pdf](#)) ✓
- **03. 09. 2021 – JD's motion to compel praecipe** ([pdf](#))
- **08. 09. 2021 – JD's motion to compel praecipe** ([pdf](#))
- **08. 09. 2021 – AH's motion to certify** ([pdf](#))
- **08. 09. 2021 – AH's memorandum in support of motion to certify Aug 17th order for interlocutory appeal** ([AH-MemoCertify](#)) ✓

- **09. 09. 2021 – consent order for appointment of conciliator and discovery conciliation protocol** ([pdf](#)) is also attachment 2 in AH's opposition to JD's motion to compel production of original devices and operating system drives and cloud backups of these original devices as requested in JD's 7th RFPs from 22. 10. 2021, p. 19 – 22 of pdf ([AH-OppForensEvid](#)) ✓
- **13. 09. 2021 – meet & confer**
- **14. 09. 2021 – consent order regarding JD's responses to 4th, 5th, 6th and 7th RFPs, by which JD shall produce all non-privileged documents and privileges for all his employees related to any alcohol or drug abuse, physical violence, or property damage** is on p. 144 – 145 of pdf in in AH's memorandum to compel JD's production of original devices and operating system drives and cloud backups as requested in her 14th, 15th and 16th RFPs from 22. 12. 2021 ([AH-MemoJDsDevices-Attachs](#)) ✓
 - JD shall produce all non-privileged documents or privilege log simulations for AH's 4th RFPs no. 1, 2, 4, 5, 7, 8, 9, and revised 10
- **14. 09. 2021 – consent order that JD shall produce all videos, photos, audios and transcripts related to the VA case, incl. metadata**
- **20. 09. 2021 – foreign subpoena for LAPD** ([pdf](#))
- **24. 09. 2021 – AH's motion to compel JD's IME praecipe** ([pdf](#))
- **24. 09. 2021 – JD's motion to compel praecipe** ([pdf](#))
- **24. 09. 2021 – JD's motion to compel** ([pdf](#))
- **24. 09. 2021 – JD's memorandum in support of his motion to compel AH's production of original devices and operating system drives and cloud backups as requested in his 7th RFPs** ([JD-MemoDeviceDriveCloud](#), [pdf2](#)) ✓
 - ...her original devices, including mobile devices, laptops, and iPads, as well as operating system drives and cloud backups... for purposes of forensically imaging all relevant data... (p. 1)
 - **Mr. Depp's expert has already determined that at least some of Ms. Heard's photographs appear to have been run through a photo editing program...** (p. 1)
 - ...without obtaining a forensic image, specifically a "physical" (or byte-by-byte) image, "CheckM8" image, or advanced logical image... (p. 3)
 - JD's 7th RFPs from 12. 2. 2021 (p. 9 – 21 of pdf, exh. 1)
 - VA declaration of Amber Heard, with exhibits, from 10. 4. 2019 (p. 23 – 280, exh. 2)
 - Brian Neumeister's CV (p. 282 – 290 of pdf, exh. 3)
 - Matthew Erickson's CV (p. 292 – 295 of pdf, exh. 4)
 - p. 1 and 10 – 12 of JD's designation/identification of expert witnesses from 4. 11. 2019 (p. 297 – 300 of pdf, exh. 5)
 - AH's objections and responses to JD's 7th RFPs from 5. 3. 2021 (p. 302 – 332 of pdf, exh. 6)
 - parameters for extracting data from forensic image of original devices (p. 333 – 337 of pdf, exh. 7)
- **24. 09. 2021 – AH's opposition to motion to compel her IME praecipe** ([pdf](#))
- **29. 09. 2021 – JD's opposition to AH's motion to certify Aug 17th order for interlocutory appeal** ([JD-OppInterlocApp](#), [pdf2](#)) ✓

- Discovery in this action has also revealed that **Ms. Heard does not appear to be covering her own litigation expenses in connection with this action**. Ms. Heard's tax returns, which she produced in this case, show no deductions for business expenses that would be associated with this case. Mr. Depp, accordingly, believes that Ms. Heard's litigation expenses are being covered by a third party or parties. (p. 3)
- **01. 10. 2021 – foreign subpoena for dr. David Kipper** ([pdf](#)) ✓
 - p. 55 – 57, 78 , 97 – 98, and 185 of VA deposition of David Kipper from 22. 2. 2021 (p. 8 – 19 of pdf, exh. A)
 - p. 1 and 21 of JD's designation/identification of expert witnesses from 16. 2. 2021 (p. 21 – 23 of pdf, exh. B)
- **01. 10. 2021 – foreign subpoena for Elon Musk** ([pdf](#))
- **01. 10. 2021 – foreign subpoena for James Franco** ([pdf](#), [pdf](#))
- **01. 10. 2021 – foreign subpoena for Tasya van Ree** ([pdf](#))
- **01. 10. 2021 – JD's opposition to motion to compel his IME praecipe** ([pdf](#))
- **01. 10. 2021 – JD's response to AH's cross motion to compel evidentiary sanctions**
- **04. 10. 2021 – foreign subpoena for Erin Boerum** ([pdf](#))
- **04. 10. 2021 – foreign subpoena for officer Christopher Diener** ([pdf](#))
- **04. 10. 2021 – foreign subpoena for officer William Gatlin** ([pdf](#))
- **06. 10. 2021 – AH's reply memorandum in support of motion to certify Aug 17th order for interlocutory appeal** ([AH-ReplMemolInterlocApp](#), [pdf2](#)) ✓
 - p. 92 from hearing from 22. 7. 2021 (p. 10 – 15 of pdf, att. 1)
- **07. 10. 2021 – foreign subpoena for Debbie Lloyd** ([pdf](#))
- **12. 10. 2021 – order denying AH IME of JD** ([pdf](#), [pdf2](#)) ✓
- **15. 10. 2021 – AH's cross motion to compel praecipe** ([pdf](#))
- **15. 10. 2021 – AH's cross motion to compel** ([pdf](#))
- **15. 10. 2021 – AH's memorandum supporting cross motion to compel JD's production of forensic evidence** ([AH-MemoCrossMot](#)) ✓
 - I. AH demands full **audios DEPP8271 and DEPP17814** of conversations between JD and AH, recorded by JD, which she claims JD only produced as partial, but with apparently the full set of metadata
 - II. all native versions, metadata, and forensic images of everything showing JD being abused
 - p. 13 – 14 of JD's supplemental responses and objections to AH's 7th RFPs from 30. 9. 2020 (p. 10 – 13 of pdf, att. 1)
 - [consent order](#) from 14. 9. 2020 (p. 16 – 18, att. 2)
 - **transcripts of audio recording DEPP8271 and DEPP17814** (p. 21 – 22 of pdf, att. 3) [it is clear from par. I that these are two separate audio recordings, but maybe they could be part of the same conversation? Andy [analysis](#) (9:54) was posted by SEC (29. 10. 2021)]

- b/w screenshots of JD's scratched face [photo 1](#), [photo 2](#), [photo 3](#) by Mr. Bett from 15. 12. 2015, and a [photo](#) of JD's swollen bruise from 12. 4. 2016 (p. 24 – 27 of pdf, att. 4) [the date has been corrected to 23. 3. 2015]
- p. 17 – 18 of JD's responses and objections to AH's 13th RFPs from 14. 8. 2021 (p. 29 – of pdf, att. 5)
- p. 12 – 13 of JD's responses and objections to AH's 1st ROGs from 28. 10. 2019 (p. 35 – 38, att. 6)
- **15. 10. 2021 – foreign subpoena for Amanda de Cadenet** ([pdf](#))
- **15. 10. 2021 – foreign subpoena for Brandon McCulloch** ([pdf](#))
- **15. 10. 2021 – foreign subpoena for Natasha Brooks** ([pdf](#))
- **18. 10. 2021 – order denying AH's interlocutory appeal** ([pdf](#)) ✓
- **20. 10. 2021 – foreign subpoena for Natasha Brooks** ([pdf](#), [pdf](#))
- **20. 10. 2021 – foreign subpoena for Amanda de Cadenet** ([pdf](#), [pdf](#))
- **20. 10. 2021 – foreign subpoena for Brandon McCulloch** ([pdf](#), [pdf](#))
- **22. 10. 2021 – Julian Ackert's declaration** (JuAc 21-10-22 dc) is attachment 11 in AH's opposition to JD's motion to compel production of original devices and operating system drives and cloud backups of these original devices as requested in JD's seventh set of requests from 22. 10. 2021, p. 80 – 91 of pdf ([NGN-OppForensEvid](#)) ✓
 - 9. I understand from [JD]'s proposed order that the list of Requested Material includes text/chat and email communications between Ms. Heard and 38 individuals over an approximate 7 year timeframe, as well as photographs, deleted photographs, audio/video recordings and deleted audio/video recordings during various time periods over a 3½ year timeframe.
 - 10. There has already been significant work performed by [AH]'s legal team in this case, including forensic imaging of devices and data sets, extraction of data from those devices and data sets.
 - Juilan Ackert's CV (exh. A)
- **22. 10. 2021 – AH's opposition to motion to compel praecipe** ([pdf](#))
- **22. 10. 2021 – AH's opposition to JD's motion to compel production of original devices and operating system drives and cloud backups of these original devices as requested in JD's 7th RFPs** ([AH-OppForensEvid](#), [pdf2](#)) ✓
 - the "disco bloodbath" [texts](#) is DEPP8495
 - proposed order granting JD's motion which incl. a **list of dates & a list of persons**, from 10. 2021 (p. 10 – 15 of pdf, att. 1)
 - [consent order](#) for appointment of conciliator and discovery conciliation protocol from 9. 9. 2021 (p. 19 – 22 of pdf, att. 2)
 - emails between Mr. Chew, Ms. Bredehoft and Mr. Murphy from 9. + 24. 8., 1. + 2. 9. 2021 (p. 24 – 30 of pdf, att. 3)
 - p. 1 and 28 – 29 of AH's responses and objections to JD's 3rd RFPs from 4. 9. 2020 (p. 32 – 35 of pdf, att. 4)
 - order regarding JD's request for 2nd and 3rd RFPs from 30. 12. 2020 (p. 38–39 pdf)
 - "disco bloodbath" [texts](#) between AH and JD from 12. 3. 2013 (p. 42 of pdf)

- par. 1 – 7 and 33 – 35 from the 2nd UK [witness statement](#) of Johnny Depp from 12. 12. 2019 (p. 44 – 47 of pdf)
- p. 170 – 172 and 185 – 188 of transcript of [UK hearing](#) from 8. 7. 2020 (p. 49 – 51 of pdf)
- digital forensic report of Timothy James Latulippe from 19. 7. 2020 (p. 52 – 70 pdf)
- par. 558 – 573 from [UK judgement](#) from 2. 11. 2020 (p. 72 – 78 of pdf)
- declaration with exhibits of forensic expert Julian Ackert from 22. 10. 2021 (p. 80 – 91 of pdf)
- JD's responses and objections to AH's 13th RFPs from 24. 8. 2021 (p. 93 – 96 of pdf)
- **22. 10. 2021 – JD's opposition to cross motion to compel praecipe** ([pdf](#))
- **22. 10. 2021 – JD's opposition to AH's cross motion to compel production of forensic evidence** ([JD-OppForensEvid](#), [pdf2](#)) ✓
 - Ill. Ms. Heard asserts that Mr. Depp produced only "selected excerpts" of two audio recordings that were produced under the Bates numbers DEPP8271 and DEPP17814... It was the Sun, one of the defendants in the U.K. case, not Mr. Depp, which first produced the Audio Recordings to Mr. Depp's British counsel... Presumabl the Sun obtained them from Ms. Heard. ... [they] were then produced by Mr. Depp as part of the trial bundles... We reproduced the Audio Recordings in this case in the same version as received from Mr. Depp's U.K. counstel... If they contain only partial conversations, then either only part of the conversations were ever recorded, or Ms. Heard, or someone on her behalf altered them.
 - email from Mr. Murphy to Mr. Chew from 22. 9. 2021 (p. 9 – 13 of pdf)
- **22. 10. 2021 – foreign subpoena for Jessica Kovacevic** ([pdf](#), pdf / [pdf](#), [pdf](#))
- **22. 10. 2021 – foreign subpoena for Hector Galindo** ([pdf](#), pdf / [pdf](#), [pdf](#))
- **24. 10. 2021 – JD's motion to compel production of devices, drives and cloud backups praecipe**
- **24. 10. 2021 – AH's motion to compel medical examination of JD praecipe**
- **24. 10. 2021 – AH's response to motion to compel her IME**
- **25. 10. 2021 – notice for deposition of William Gatlin** ([pdf](#))
- **25. 10. 2021 – notice for deposition of Christopher Diener** ([pdf](#))
- **25. 10. 2021 – notice for deposition of Debbie Lloyd** ([pdf](#))
- **25. 10. 2021 – notice for deposition of Erin Boerum** ([pdf](#))
- **26. 10. 2021 – foreign subpoena for Tasya van Ree** ([pdf](#), pdf / [pdf](#), [pdf](#))
- **26. 10. 2021 – foreign subpoena for James Franco** ([pdf](#), pdf / [pdf](#), [pdf](#))
- **26. 10. 2021 – foreign subpoena for Elon Musk** ([pdf](#), [pdf](#) / [pdf](#), [pdf](#))
 - [letter](#) from CHLA to AH thanking AH for her recommendation that someone makes \$500,000 donation, from 18. 7. 2017 (p. 16 of pdf, exh. 1)
- **29. 10. 2021 – hearing's p. 8 is on p. 206 of pdf in AH's memorandum in support of motion to compel responses to 11th and 12th RFPs from 24. 11. 2021** ([AH-MemoFor11+12](#)), and p. 37, 43, and 68 are p. 1 – 7 of pdf in AH's memorandum to compel JD's production of original devices and operating system drives and cloud backups as requested in her 14th, 15th and 16th RFPs ([AH-MemoJDsDevices-Attachs](#)) ✓

- Mr. Heard and her friends then fabricated photos that she used to obtain an ex parte TRO and a seven million dollar divorce settlement which Ms. Heard falsely testified in London she gave to the ACLU and, more scandalously, to the Children's Hospital of Los Angeles; sick children with cancer. (p. 8)
 - Mr. Neumaister has said ... just as The Sun's expert has concluded ... that some of these photographs ... have passed through an editing machine. (p. 37)
 - But if these are real photographs, she should want to be able to prove them. ... And if she doesn't have her ... device from 2012, well, then that's the answer. (p. 43)
- **08. 11. 2021 – order denying AH's cross-motion for JD's devices, and granting JD's request for production of forensic evidence ([pdf/pdf](#)) ✓**
 - incl. a list with dates (15 Dec 2012 – 15 Jan 2013, 6 Mar 2013 – 5 Apr 2013, 1 – 30 Jun 2013, 22 May 2014 – 7 Jun 2014, 15 – 31 Aug 2014, 15 – 31 Dec 2014, 23 Jan – 8 Feb 2015, 1 – 19 Mar 2015, 20 Mar – 6 Apr 2015, 1 – 31 Aug 2015, 24 Nov – 10 Dec 2015, 13 – 29 Dec 2015, 29 Dec – 12 Jan 2016, 19 Apr – 5 May 2016, 19 May – 4 Jun 2016, 15 – 29 Jul 2016)
 - **08. 11. 2021 – AH's 14th RFPs** are extracted from JD's responses and objections to AH's 14th RFPs from 29. 11. 2021 which are on p. 16 – 32 pdf in AH's memorandum to compel JD's production of original devices and operating system drives and cloud backups as requested in her 14th, 15th and 16th RFPs ([AH-MemoJDsDevices-Attachs](#)) ✓
 - 1. everything related to Christian Carino and the **audio recording DEPP8296** that "have gotten emails from every fucking studio fucking head from every motherfucker. I didn't do a thing. 'I'm sorry you're going through this. I'm so sorry.' Clearly she's out of her fucking mind. She is viewed as out of her fucking mind across the globe."
 - 4. – 12. inventories of JD's iPhone, JD's iPad, JD's MacBook Pro, JD's iCloud account, Stephen Deuters' iPhone collected in May 2017, Stephen Deuters' iPad collected in May 2017, any additional Stephen Deuters' devices and data, Nathan Holmes' iPhone collected in March 2018, any additional Nathan Holmes' devices and data
 - 13. everything between JD and any media related to audio or video recordings
 - 14. everything related to the AUS investigation
 - **12. 11. 2021 – AH's 15th RFPs** are extracted from JD's responses and objections to AH's 15th RFPs from 3. 12. 2021 which are on p. 41 – 104 of pdf in AH's memorandum to compel JD's production of original devices and operating system drives and cloud backups as requested in her 14th, 15th and 16th RFPs ([AH-MemoJDsDevices-Attachs](#)) ✓
 - 1.– 4. + 13. + 21.– 24. all photos, videos, audios, and communications of AH on JD's devices from relevant dates
 - 5.– 8. + 14.– 20. all photos, videos and audios of JD or his injuries on JD's devices from relevant dates
 - 9.– 12. + 25.– 28. all photos, videos and audios of any damage on JD's devices from relevant dates
 - 29. – 30. all photos or videos of AH's Los Angeles home from 26. 2. – 18. 3. 2013
 - 31. – 32. all photos or videos regarding the Boston Plane from 22. – 26. 5. 2014
 - 33. – 34. all photos or videos of the Bahamas property from 1. – 31. 8. 2014

- 35. – 36. all photos or videos of the AUS property from 1. – 31. 3. 2015
- 37. – 38. all photos or videos of the Eastern Columbia Building from 1. – 31. 3. 2015
- 39. – 40. all photos or videos of the Eastern Columbia Build. from 10. – 21. 12. 2015
- 41. – 42. all photos or videos of the Eastern Columbia Build. from 15. – 27. 4. 2016
- 43. – 44. all photos or videos of the Eastern Columbia Build. from 15. – 27. 5. 2016
- 45. – 46. all photos and videos of Hicksville from 1. – 5. 7. 2013
- they are desperately trying to get JD's devices for forensic imaging
- **17. 11. 2021 – Ben Wizner's ACLU representative deposition**
- **19. 11. 2021 – order granting AH's issuance of commission ([pdf](#)) ✓**
- **19. 11. 2021 – AH's 16th RFPs are extracted from p. 14 and 45 – 55 of JD's responses and objections to AH's 16th RFPs from 29. 11. 2021 which are on p. 106 – 121 of pdf in AH's memorandum to compel JD's production of original devices and operating system drives and cloud backups as requested in her 14th, 15th and 16th RFPs ([AH-MemoJDsDevices-Attachs](#)) ✓**
 - 1. everything containing the word "monster" from 1. 1. 2012 onwards
 - 28. – 36. all photos, videos, audios and communications of JD's finger injury and JD himself between 17. 2. and 19. 3. 2015, and they try yet again for JD's devices
 - 37. any payments made by JD or his entities or agents, to anyone asserting claims against JD
- **22. 11. 2021 – order granting audiovisual testimony ([pdf](#)) ✓**
- **23. 11. 2021 – Christopher Diener's deposition**
- **23. 11. 2021 – William Gatlin's deposition**
- **24. 11. 2021 – AH's motion to compel praecipe ([pdf](#))**
- **24. 11. 2021 – AH's motion to compel ([pdf](#))**
- **24. 11. 2021 – AH's memorandum in support of motion to compel responses to 11th and 12th RFPs ([AH-MemoFor11+12](#), [pdf2](#)) ✓**
 - JD's responses and objections to AH's 11th RFPs from 16. 2. 2021 (p. 9 – 122 of pdf)
 - p. 11 – 18 of JD's responses and objections to AH's 12th RFPs from 1. 3. 2021 (p. 123 – 134 of pdf)
 - p. 29 from AH's [amended answer](#) and grounds of defense from 13. 4. 2021 (p. 135 – 138 of pdf)
 - p. 2494 – 2496 and 2501 – 2504 of [UK trial](#) from 28. 7. 2020 (p. 139 – 140 of pdf)
 - p. 2 and 4 from JD's [memorandum](#) in support of motion to compel AH's further responses without objections and production of documents in response to 4th RFPs from 12. 2. 2021 (p. 141 – 145 of pdf)
 - p. 73, 126 – 128, 160 – 169, 183, 198 from deposition of Tracey Jacobs from 30. 5. 2018 (p. 146 – 164 of pdf)
 - email from The Wrap to Tracey Jacobs from 15. 11. 2014, 12:17 (p. 165 of pdf)
 - emails between Tracey Jacobs and Christi Dembrowski from 26. and 27. 2. 2015 (p. 166 – 168 of pdf)
 - JD's answer and [grounds of defense](#) from 22. 1. 2021 (p. 169 – 196 of pdf)
 - p. 8 from JD's [opposition](#) to AH's motion to certify Aug17th 2021 order for interlocutory appeal from 29. 9. 2021 (p. 197 – 201 of pdf)

- p. 8 of hearing from 29. 10. 2021 (p. 202 – 207 of pdf)
- p. 15 – 24 of JD's responses and objections to AH's 1st ROGs from 28. 10. 2019 (p. 208 – 221 of pdf)
- p. 10 – 12 of JD's supplemental responses and objections to AH's 1st ROGs from 14. 8. 2020 (p. 222 – 230 of pdf)
- [order](#) from 19. 8. 2021 (p. 230 – 234 of pdf)
- p. 9 – 11 of JD's responses and objections to AH's 2nd ROGs from 20. 12. 2019 (p. 235 – 241 of pdf)
- p. 9 – 10 of JD's supplemental responses and objections to AH's 2nd ROGs from 21. 8. 2020 (p. 242 – 247 of pdf)
- p. 8 – 12 of JD's responses and objections to AH's 1st RFAs from 20. 12. 2019 (p. 248 – 255 of pdf)
- p. 8 – 9 of JD's supplemental responses and objections to AH's 1st RFAs from 21. 8. 2020 (p. 256 – 260 of pdf)
- p. 9 – 41 of JD's responses and objections to AH's 4th RFAs from 25. 2. 2021 (p. 261 – 297 of pdf)
- p. 9 – 24 of JD's responses and objections to AH's 5th RFAs from 3. 3. 2021 (p. 298 – 317 of pdf)
- **29. 11. 2021 – JD's responses and objections to AH's 14th RFPs** are on p. 16 – 32 of pdf in AH's memorandum to compel JD's production of original devices and operating system drives and cloud backups as requested in her 14th, 15th and 16th RFPs ([AH-MemoJDsDevices-Attachs](#)) ✓
- **02. 12. 2021 – Terence Dougherty's ACLU representative deposition**
- **02.-03. 12. 2021 – subpoenas for WBEI** are exhibit 1 in JD's opposition to WBEI's motion to quash subpoenas; request for sanctions; declaration of Samuel Moniz in support from 22. 2. 2022, p. 23 – 43 of pdf ([JD-oppWBquash](#))
- **03. 12. 2021 – JD's opposition to AH's motion to compel responses to 11th and 12th RFPs praecipe** ([pdf](#))
- **03. 12. 2021 – JD's opposition to AH's motion to compel responses to 11th and 12th RFPs** ([JD-OppAH11+12](#), [pdf2](#)) ✓
 - I. JD has already produced many film contracts and agrees to produce any additional film contracts and his contract with Christian Dior
 - V. JD's charitable donations are irrelevant
- **03. 12. 2021 – JD's responses and objections to AH's 15th RFPs** are p. 41 – 104 of pdf in AH's memorandum to compel JD's production of original devices and operating system drives and cloud backups as requested in her 14th, 15th and 16th RFPs ([AH-MemoJDsDevices-Attachs](#)) ✓
- **08. 12. 2021 – Connel Cowan's deposition**
- **10. 12. 2021 – notice of deposition by video for Erin Boerum** ([pdf](#)/[jpg](#))
- **10. 12. 2021 – JD's responses and objections to AH's 16th RFPs** are p. 106 – 121 of pdf in AH's memorandum to compel JD's production of original devices and operating

system drives and cloud backups as requested in her 14th, 15th and 16th RFPs ([AH-MemoJDsDevices-Attachs](#)) ✓

- **15. 12. 2021 – Anthony Romero's ACLU representative deposition**
- **17. 12. 2021 – order by which JD has to identify responsive documents by Bates numbers, has to produce non-privileged documents reflecting consumption of drugs, alcohol, or medications on the dates of alleged abuse, a fully executed copy of his separation agreement with Ms. Paradis, non-privileged pictures, recordings and other documents regarding the incident with Mr. Brooks, and non-privileged documents to unknown requests ([jpg](#)) ✓**
- **22. 12. 2021 – JD's motion to compel AH's 4th ROGs and 10th and 11th RFPs praecipe ([jpg](#))**
- **22. 12. 2021 – Julian Ackert's declaration (JuAc 21-12-22 dc) is on p. 133 – 143 of pdf in AH's memorandum to compel JD's production of original devices and operating system drives and cloud backups as requested in her 14th, 15th and 16th RFPs ([AH-MemoJDsDevices-Attachs](#)) ✓**
 - he is AH's forensic imaging expert
 - 8. I have reviewed the metadata for many of Mr. Depp's produced documents – specifically multimedia documents such as audio files and pictures, including those documents referenced in my declaration below.
 - 9. Based on my review of the produced metadata, there are anomalies that call into question the authenticity of the multimedia documents. Specifically, I find instances where the date metadata, such as reation and modification date metadata, is either missing or is significantly after the alleged date of the incident. [did he take into consideration that many photos and recordings JD has produced have been photographed or recorded by third parties (incl. AH)? could that change the creation date metadata, and certainly modificastion date metadata? eg. if a photo was transferred from a phone to a computer then sent to another computer? or if a photo had its title changed to a more logical title with the date it was taken?]
 - 10. For example, DEPP00007303 is a picture produced with limited creation and modification data – all of which is dated July 22, 2019. [this is, interestingly, the 12th day of the UK hearing.] I understand that the date of the alleged incident captured by this image is March 2015...
 - 11. In another example, DEPP00009916 is a picture produced with no creation date metadata and modification date metadata of July 3, 2020. On the face of the picture, I can see a date of March 9, 2015, but I have no way of authenticating that the picture was not modified or altered on July 3, 2020. [this the photo of JD in the Gold Coast University Hospital on p. 165 of this pdf, right? interesting choice of picture, because this is one instance that can be amply proven by other evidence. could the modification date be explained by the preparation of documents for the UK proceedings?]
 - 12. DEPP00009047 is yet another example of a produced document with metadata anomalies. the metadata indicates that the audio content was created in September 2015 and then somehow modified in June 2016. [could the newer date

indicate that it was perhaps cleaned or otherwise improved for the use in the divorce proceedings?]

- **22. 12. 2021 – AH's motion to compel JD's production of original devices and operating system drives and cloud backups praecipe ([jpg](#))**
- **22. 12. 2021 – AH's motion to compel JD's production of original devices and operating system drives and cloud backups as requested in her 14th, 15th and 16th RFPs ([pdf](#))**
- **22. 12. 2021 – AH's memorandum to compel JD's production of original devices and operating system drives and cloud backups as requested in her 14th, 15th and 16th RFPs ([AH-MemoJDsDevices](#)) ✓**
 - In response [to the UK order from 6. 3. 2020], Mr. Depp produced multiple **partial audio recordings** that begin and end in the middle of a sentence – **DEPP9046, 9047, 8259, 8260, 8297, and 8298.**
- **22. 12. 2021 – attachments to AH's memorandum to compel JD's production of original devices and operating system drives and cloud backups as requested in her 14th, 15th and 16th RFPs ([AH-MemoJDsDevices-Attachs](#)) ✓**
 - p. 37, 43, and 68 of transcript of hearing from 29. 10. 2021 (p. 1 – 7 of pdf)
 - [order](#) granting JD forensic imaging of AH's devices from 8. 11. 2021 (p. 8 – 13 of pdf)
 - JD's responses and objections to AH's 14th RFPs from 29. 11. 2021 (p. 16 – 32 pdf)
 - p. 12 – 13 of JD's responses and objections to AH's 1st ROGs from 28. 10. 2019 (p. 35 – 38 of pdf)
 - p. 14 and 45 – 55 of JD's responses and objections to AH's 15th RFPs from 3. 12. 2021 (p. 41 – 104 pdf)
 - JD's responses and objections to AH's 16th RFPs from 10. 12. 2021 (p. 106 – 121 of pdf)
 - proposed consent order for forensic imaging of JD's original devices from 12. 2021 (p. 123 – 130 of pdf)
 - declaration of Julian Ackert with his CV from 22. 12. 2021 (p. 133 – 143 of pdf)
 - consent order respecting JD's responses to 4th, 5th, 6th and 7th RFPs, by which JD shall produce all non-privileged documents and privileges for all his employees related to any alcohol or drug abuse, physical violence, or property damage, from 14. 9. 2021 (p. 144 – 145 of pdf)
 - p. 10 of JD's responses and objections to AH's 4th RFPs from 23. 7. 2020 (p. 147 – 149 of pdf)
 - disclose order from UK trial regarding recordings from 6. 3. 2020 (p. 151 – 154 of pdf)
 - 2nd UK witness statement of Jenny Afia from 10. 3. 2020 (p. 155 – 158 of pdf)
 - 4th UK witness statement of Johnny Depp from 12. 3. 2020 (p. 159 – 161 of pdf)
 - attachments 11-16 are b/w photos:
 - [photo](#) of JD in the emergency room in Australia (p. 164 of pdf)
 - dated photo of JD in the emergency of Gold Coast University Hospital from **9. 3. 2015, 11:31** (p. 165 of pdf) [the date is not the original AUS date but the date of the photo sent to someone in the US? cause JD was admitted to the hospital on 8. 3., at 16:20, as per the [discharge letter](#)]

- [photo](#) of JD's swollen bruise under left eye from 23. 3. 2015, 11:37 (p. 166 of pdf) [this is the one that is in Mr. Bett's deposition that he originally thought was from 22. 4. 2016, but corrected that at his UK hearing]
- photo of JD, close-up of the below photo (p. 167 of pdf)
- photo of AH and JD (p. 168 of pdf)
- same dated photo of AH and JD from 30. 7. 2015? (p. 169 of pdf)
- photo of striped bands? wood? (p. 170 of pdf)
- [photo](#) of JD's bruised face, right cheek (p. 171 of pdf)
- JD's VA [complaint](#) from 1. 3. 2019 (p. 172 – 182 of pdf)
- [declaration](#) of Johnny Depp from 5. 2019 (p. 184 – 192 of pdf)
- JD's [memorandum](#) in support of his motion to compel AH's production of original devices and operating systems and cloud backups of these original devices as requested in his 7th RFPs from 24. 9. 2021 (p. 193 – 199 of pdf)
- JD's [opposition](#) to AH's cross motion to compel production of forensic evidence from 22. 10. 2021 (p. 200 – 206 of pdf)
- **27. 12. 2021 – AH's motion to compel responses to 14th, 15th and 16th RFPs praecipe ([jpg](#))**
- **04. 01. 2022 – Peter Kouvalis' LAPD representative deposition**
- **04. 01. 2022 – AH's response to JD's motion to compel 4th ROGs and 10th and 11th RFPs praecipe ([jpg](#))**
- **06. 01. 2022 – Monroe Tinker's deposition**
- **06. 01. 2022 – AH's notice of deposition by video for corporate designee for Walt Disney Motion Pictures Group, with attachments ([jpg](#)), [listen](#) to it on Stevie J Raw's YT channel (14. 1. 2022); [analysis](#) by Les and Linda in *Will Mera go by the way of the kraken?* posted on SEC (15. 1. 2020) ✓**
 - definitions and instructions (p. 4 – 10 of pdf)
 - 1. has the UK judgement or the UK appeal judgement impacted their decision on POTC or any future work with JD
 - 2. has the VA case done the same
 - 3. has any other litigation ("Security Guard Case" filed 1. 5. 2018, "Movie Set Assault Case" aka Rocky Brooks Case filed 6. 7. 2018, "Attorney Case" aka Bloom Hergott Case filed 17. 10. 2017, "Mandel Case" filed 13. 1. 2017) done it
 - 4. has the Rolling Stone or the GQ articles done it
 - 5. have JD's delays, tardiness, no-shows, alcohol use, d.v., d.a., or property damage done it
 - 6. have JD's statements in his 10. 11. 2020 deposition done it
 - 9. + 17. everything about any agreements or disagreement with JD
 - [notice they messed up UK judgement date, it's November 2, 2020 (11/2/2020 in American nomenclature, *not* 2/11/2020)]
 - article *The Trouble With Johnny Depp* by Stephen Rodrick for [Rolling Stone](#) from 21. 6. 2018, 11:51 ET (p. 12 – 32 of pdf, exh. A)
 - article *Johnny Depp will not be buried* by Jonathan Heaf for [British GQ](#) from 11. 2018 (p. 34 – 48 of pdf, exh. B)

- p. 107 – 110 from Johnny Depp's deposition from 10. 11. 2020 (p. 50 – 53 of pdf, exh. C)
- **06. 01. 2022 – AH's emergency motion for protective order to protect all individuals attending the desposition of Amber Heard** ([jpg](#)) ✓
 - it has plenty of overbroad and even ridiculous demands because she doesn't want to sit for her deposition
- **06. 01. 2022 – attachments to AH's emergency motion for protective order to protect all individuals attending the deposition of Amber Heard** ([jpg](#)) ✓
 - proposed protective order respecting deposition of Amber Heard (p. 1 – 6 of pdf, att. 1)
 - mask and social distancing policy (p. 10 of pdf, att. 4)
 - proposed consent order that AH shall appear in person for three consecutive days of deposition which shall commence on 12. 1. 2022 (or it must be concluded by 4. 3. 2022) and that JD's counsel shall provide appropriate protection (p. 12 – 17 of pdf, att. 5)
 - proposed protective order respecting deposition of Amber Heard, thereby AH should sit for her deposition on 12. – 14. 1. 2022 (p. 21 of pdf, att. 10)
- **07. 01. 2022 – hearing**
- **10. 01. 2022 – calendar control order** ([pdf](#))
- **10. 01. 2022 – order granting AH 15 ROGs and JD additional 9 ROGs** ([pdf](#)) ✓
- **11. 01. 2022 – AH's disclosure of expert witnesses**
- **12. 01. 2022 – Amber Heard's deposition I** (AmHe 22-01-12 dp)
- **13. 01. 2022 – Amber Heard's deposition II** (AmHe 22-01-13 dp)
- **13. 01. 2022 – application pro hac vice for Stephanie Calnan for JD** ([pdf](#))
 - the application itself dates from 21. 8. 2021
- **13. 01. 2022 – consent motion to admit pro hac vice Stephanie Calnan for JD** ([pdf](#))
- **14. 01. 2022 – Amber Heard's deposition III** (AmHe 22-01-14 dp)
- **14. 01. 2022 – agreed order to admit Stephanie Calnan as co-counsel for JD** ([pdf](#))
- **20. 01. 2022 – Robin Baum's deposition**
- **20. 01. 2022 – Debra Lloyd's deposition**
- **20. 01. 2022 – Raquel Pennington's deposition I**
- **21. 01. 2022 – Alan Blaustein's deposition**
- **21. 01. 2022 – Raquel Pennington's deposition II**
- **25. 01. 2022 – Sean Bett's deposition**
- **25. 01. 2022 – meet & confer**
- **26. 01. 2022 – Joel Mandel's deposition**
- **26. 01. 2021 – hearing**
- **26. 01. 2022 – calendar control order for JD's summary judgement** ([pdf](#)) ✓
 - [summary judgement is a decision based on statements and evidence without going to trial. it may be issued on an entire case or on specific issue(s) in that case. the movant (JD) must show that there is no genuine dispute as to any material fact, and that the movant is entitled to judgement as a matter of law. this means that there is a lack of evidence. in this case, summary judgement may be linked to a

discovery in a deposition, a discovery in AH's digital devices, or to the counterclaim. in the process, the opposing team (AH) will have to show evidence to stop the judgement. for a legal perspective of the summary judgement see Andrea's [video](#) (15:15) posted by Colonel Kurtz (4. 2. 2022)]

- **27. 01. 2022 – meet & confer**
- **28. 01. 2022 – AH's motion to compel** ([pdf](#))
- **28. 01. 2022 – AH's memorandum in support of motion to compel responses to 3rd RFAs and 14th, 16th and 17th RFPs** ([AH-Memo-3-RFA-14+16+17-RFPs](#)) ✓
 - Ms. Heard seeks expedited production of these non-privileged documents for purposes of Mr. Waldman's deposition on February 15, 2022 and for opposing Mr. Depp's Motion for Summary Judgement in this exact issue. (p. 5)
- **28. 01. 2022 – exhibits to AH's memorandum in support of motion to compel responses to 3rd RFAs and 14th, 16th and 17th RFPs** ([AH-Memo-3-RFA-14+16+17-RFPs-Exhibits](#)) ✓
 - emails between Charlson Bredehoft and Brown Rudnick regarding 14th, 16th and 17th RFPs from 13. 12. 2021 till 25. 1. 2022 (p. 1 – 26 of pdf)
 - proposed consent order (p. 27 – 28 of pdf)
 - emails between Brown Rudnick and Charles Bredehoft from 6. and 18. 1. 2022 (p. 29 of pdf)
 - proposed consent order (p. 30 – 33 of pdf)
 - [order](#) from 12. 5. 2021 (p. 34 – 35 of pdf)
 - p. 9 from JD's 4th RFPs (p. 36 – 37 of pdf)
 - p. 3 – 4 from JD's memorandum in support of motion to compel AH's further responses without objections and production of documents in response to 4th RFPs (p. 38 – 41 of pdf)
 - [order](#) from 19. 8. 2021 (p. 42 – 45 of pdf)
 - proposed order (p. 46 – 52 of pdf)
- **01. 02. 2022 – order that JD shall produce any photos of his finger or hand within one week of before and after the injury, and JD is not compelled to produce any metadata or photos from no-parties or third parties** ([pdf](#)) ✓
- **02. 02. 2022 – Edward White's deposition**
- **03. 02. 2022 – Whitney Henriquez' deposition**
- **04. 02. 2022 – JD's response to AH's motion to compel praecipe** ([pdf](#))
- **04. 02. 2022 – Erin Falati (Boerum)'s deposition**
- **07. 02. 2022 – Amy Banks' deposition**
- **07. 02. 2022 – JD's motion to admit pro hac vice Kathleen Zellner as counsel** ([pdf](#))
- **09. 02. 2022 – order admitting Katherine Zellner as counsel for JD** ([pdf](#)) ✓
 - [Katherine Zellner's [interview](#) (50:59) by canadian judge Harvey Brownstone from 16. 9. 2021]
- **09. 02. 2022 – JD's notice of deposition for Kate Slater on Feb 25th** ([pdf](#))
- **09. 02. 2022 – JD's notice of deposition for Warren Zavala on Feb 24th** ([pdf](#))
- **09. 02. 2022 – calendar control order for attorneys' fees** ([pdf](#)) ✓

- 09. 02. 2022 – calendar control order for JD's summary judgement ([pdf](#)) ✓
- 10. 02. 2022 – JD's notice of deposition for Kate Slater on Mar 3rd ([pdf](#))
- 10. 02. 2022 – JD's notice of deposition for Warren Zavala on Mar 4th ([pdf](#))
- 11. 02. 2022 – Tina Newman's Disney representative deposition
- 15. 02. 2022 – Adam Waldman's deposition
- 15. 02. 2022 – notice of appearance of Karen Stemland for AH ([pdf](#))
- 16. 02. 2022 – order that JD shall admit or deny authenticity of photos from AH's 3rd RFAs (1-14, 19-22, 27-49, 61-85, 102, 106, 114-118, 122-124, 128, 130, 134-162) & shall produce non-privileged documents to certain AH's 17th RFPs (48-59, 65-72, 79-91, 106-119) & to AH's 14th RFPs requests 1-3 (audio with Christian Carino) & to certain AH's 16th RFPs (2-27 regarding counterclaim, 38 recordings/photos of AH from JD or any representatives from 2012, 39 alcohol or drug use, 42 any physical violence, 45 negative impact on reputation or career) ([pdf](#)) ✓
- 17. 02. 2022 – Bruce Witkin's deposition
- 18. 02. 2022 – Katherine James' deposition
- 18. 02. 2022 – Bryan Neumeister's declaration is exhibit B in JD's motion for sanctions for failure to comply with Nov8 2021 order from 23. 3. 2022, p. 20 – 21 of pdf ([JD-MotForSanctionsForForensicImaging](#)) ✓
 - 7. To date, some forensic imaging of Ms. Heard's devices has occurred, but no photographs have been produced to me for my review.
- 02. 2022 – JD's petition for pool camera in courtroom
- 02. 2022 – AH's petition against pool camera in courtroom
- 21. 02. 2022 – Lauren Anderson's deposition
- 22. 02. 2022 – Christi Dembrowski's deposition
- 24. 02. 2022 – Stephen Deuters' deposition
- 25. 02. 2022 – JD's memorandum in support of his motion for summary judgement re: counterclaim of AH ([JD-MemoSummaryJudgement1](#)) ✓
 - Ms. Heard fails to state a valid claim against Mr. Depp, for at least three reasons. First, no evidence supports Ms. Heard's allegations that Mr. Depp "conspired" with or directed Mr. Waldman to make the Counterclaim Statements, so Ms. Heard cannot establish that Mr. Depp is directly liable. Second, to the extent Ms. Heard seeks to hold Mr. Depp vicariously liable for Mr. Waldman's conduct, she must establish that Mr. Waldman committed the tort of defamation. But Ms. Heard – a public figure – cannot establish that Mr. Waldman acted with actual malice. Third, in context, the Counterclaim Statements are non-actionable opinions. (p. 1)
- 25. 02. 2022 – pre-trial conference
- 25. 02. 2022 – order allowing one pool camera in courtroom ([pdf](#)) ✓
 - [more info in *Attorney says Heard was raped during relationship with Depp* by Joan Henessy for [courthousenews](#) from 25. 2. 2022]
- 25. 02. 2022 – AH's motion to compel 6th-10th RFAs, 3rd-5th ROGs, 19th-20th RFPs praecipe ([pdf](#))
- 25. 02. 2022 – AH's motion to compel 6th-10th RFAs, 3rd-5th ROGs, 19th-20th RFPs ([jpg](#))

- **25. 02. 2022 – AH's memorandum in support of motion to compel 6th-10th RFAs, 3rd-5th ROGs, 19th-20th RFPs ([jpg](#)) removed on 4. 3. 2022 ✓**
 - For the 3d RFAs, the Court reconfirmed that "Mr. Depp shall admit or deny the authenticity of the photographs identified in Ms. Heard's 3rd [RFAs]" after "receipt of the relevant and non-privileged Extracted Data from Craig Young." ... By the time of the hearing... Mr. Depp should have had access to all photos for some time... (p. 1) [[who is Craig Young?](#)]
- **01. 03. 2022 – Jessica Kovacevic's deposition**
- **02. 03. 2022 – Jacob Bloom's deposition**
- **02. 03. 2022 – Rami Sarabi's deposition**
- **02. 03. 2022 – Brandon Patterson's deposition**
- **03. 03. 2022 – Jennifer Howell's deposition II**
- **04. 03. 2022 – JD's opposition to AH's motion to compel responses to 6th-10th RFAs, 3rd-5th ROGs and 19th-20th RFPs praecipe ([jpg](#))**
- **04. 03. 2022 – JD's opposition to AH's motion to compel responses to 6th-10th RFAs, 3rd-5th ROGs and 19th-20th RFPs ([jpg](#)) ✓**
 - There have been 52 depositions to date in this action (the vast majority having been noticed by Ms. Heard), with still more depositions planned. (p. 3)
- **04. 03. 2022 – commission order for deposition of David Heard ([jpg](#)) ✓**
- **08. 03. 2022 – Debra (Debbie) Lloyd's deposition**
- **09. 03. 2022 – AH's deposition designations for trial ([AH-deposition-designations](#)) ✓**
- **10. 03. 2022 – Debbie (Depp) Russell's deposition**
- **10. 03. 2022 – iO Tillet Wright's deposition**
- **11. 03. 2022 – Christian Carino's deposition II**
- **11. 03. 2022 – JD's motion for summary judgement praecipe ([jpg](#))**
- **11. 03. 2022 – JD's motion for summary judgement ([jpg](#))**
- **11. 03. 2022 – JD's memorandum in support of his motion for summary judgement to AH's anti-slapp immunity ([JD-MemoSummaryJudgement2](#)) ✓**
 - Ms. Heard has been named in this action based on the *defamatory implication* that she is a victim of domestic abuse and sexual violence at the hands of Mr. Depp. It is that defamatory implication of wrongful conduct that forms the basis of Mr. Depp's claims in this action. And because that defamatory implication relates solely to the personal grievances between the parties and does not rise to the level of a matter of public concern with broader implications for society beyond the two litigants in this action, Virginia's anti-SLAPP statute is not applicable. (p. 1)
 - As such, **the defamation claim at issue relates to the events of parties' personal relationship, and the truthfulness or falsity of Ms. Heard's statements...** (p. 1)
 - Ms. Heard has been sued for the defamatory innuendo of her words. (p. 3)
 - Ms. Heard's liability arises out of a course of conduct that culminated in the *revival* of her abuse allegations in the Op-Ed. (p. 4)
 - [[this is not summary judgement for the counterclaim, but for the anti-slapp immunity and is related to AH trying to avoke first amendment to dismiss the trial](#)]

- 11. 03. 2022 – AH's opposition to JD's motion for summary judgement praecipe ([jpg](#))
- 11. 03. 2022 – AH's opposition to JD's motion for summary judgement re: counterclaim ([AH-OppSummaryJudgement](#))
- 11. 03. 2022 – AH's response to motion for sanctions praecipe ([jpg](#))
- 11. 03. 2022 – order denying JD's emergency motion for expanded HIPAA waiver, unredacted treatment notes and treatment summary ([jpg](#)) ✓
- 11. 03. 2022 – consent order that JD shall produce non-privileged documents to specific (revised) AH's 3rd-4th ROGs, 6th-9th RFAs, 19th-20th RFPs ([jpg](#)) ✓
- 11. 03. 2022 – close of discovery
- 14. 03. 2022 – JD's witness list ([JD-witness-list](#)) ✓
 - 36 witnesses by live testimony (in person or via video link)
 - [AH is not on the list because if she was she could not be impeached]
- 14. 03. 2022 – AH's exhibit list ([AH-exhibit-list](#)) ✓
- 15. 03. 2022 – Walter Hamada's WB representative deposition
- 15. 03. 2022 – AH's witness list ([AH-witness-list](#)) ✓
 - 19 witnesses by live testimony (in person or via video link) [18 because JD is also on it], other 62 by deposition or business records declaration only
 - [[break-down of all witnesses](#)]
- 15. 03. 2022 – AH's supplemental deposition designations ([AH-suppl-depositions](#)) ✓
- 17. 03. 2022 – order that JD shall admit or deny AH's 6th-10th RFAs, respond to request 1 of AH's 4th ROGs (details about AH's physical or emotional violence or abuse upon JD), respond to request 1-3, 5 of AH's 4th ROGs, produce non-privileged docs to request 4 of AH's 20th RFPs ([jpg](#)) ✓
 - [confirmation that forensic imaging of AH's devices did take place – corrupted and thwarted, as we learned later]
- 18. 03. 2022 – AH's objections to JD's deposition designations & counter-designations ([AH-objections-JD-depositions](#)) ✓
- 18. 03. 2022 – JD's reply to AH's opposition to motion for summary judgement ([JD-ReplyOppSummaryJudgement](#))
- 21. 03. 2022 – AH's response to JD's motion for summary judgement praecipe ([jpg](#))
- 21. 03. 2022 – AH's response to JD's motion for summary judgement ([AH-RespSummaryJudgement](#))
- 22. 03. 2022 – Bryan Neumeister's declaration is exhibit C in JD's motion for sanctions for failure to comply with Nov8 2021 order from 23. 3. 2022, p. 23 – 25 of pdf ([JD-MotForSanctionsForForensicImaging](#)) ✓
 - 7. I did not receive any data that was extracted from the devices until March 2, 2022.
 - 9. One encrypted drive of photos was sent to me without the correct password... so the drive needed to be resent. On another occasion, I received the files without the raw photos, and not in the agreed upon format.
 - 10. Further, Mr. Ackert and Mr. Swasy... used unlicensed and outdated software to image the devices – including Cellebrite and Microsoft Excel.
 - 12. To date, there are approximately 58,623 photographs that I have received.

- 13. A fair percentage of these photographs are obviously not of Ms. Heard, including photographs of purported property damage, Mr. Depp, and text messages.
- 14. Further, the imaging of these devices... is something that I have never seen before in my professional experience in performing imaging without direct access to the devices or their forensic images.
- 15. Also, some of the EXIF data has dates... which do not make sense. For example, the EXIF data for some photos indicate they were taken in the 1970s or 1980s, even though EXIF data was not invented until 1995.
- **22. 03. 2022 – JD's motion for sanctions for failure to comply with Nov8 2021 order ([JD-Mot ForSanctionsForForensicImaging](#)) ✓**
 - Since the Court entered the Order on November 8, 2021, the imaging, extraction, and review process has been plagued by delays and technical snafus which are, at best, negligent and, at worst, intentional stonewalling designed to thwart the very forensic analysis ordered by the Court. (p. 1)
 - ...the forensic imaging would be conducted... by November 30, 2021. (p. 2)
 - ...as of February 18, 2022, the imaging of all of Ms. Heard's devices and cloud accounts still had not been completed and Mr. Depp's expert has not received a single piece of extracted datum to analyze. ... Mr. Neumeister did not receive any extracted data until March 2, 2022, and, to date, is still receiving data... on a rolling basis. (p. 2)
 - ...much of the data that has been provided to Mr. Neumeister to date are either irrelevant or seem to be corrupted. Of the over 58,000 photographs... (p. 3)
 - [order](#) from 8. 11. 2021 (exh. A, p. 11 – 16 of pdf)
 - Bryan Neumeister's declaration from 18. 2. 2022 (exh. B, p. 20 – 21 of pdf)
 - Bryan Neumeister's declaration from 22. 3. 2022 (exh. C, p. 23 – 25 of pdf)
 - Bryan Neumeister's CV (p. 26 – 34 of pdf)
- **23. 03. 2022 – order denying JD's Mar11 motion and AH's Mar11 cross-motion ([jpg](#)) ✓**
- **24. 03. 2022 – order denying JD's motion for summary judgement as to AH's anti-slapp immunity ([jpg](#)) ✓**
- **24. 03. 2022 – order denying JD's motion for summary judgement as to AH's counterclaim ([jpg](#)) ✓**
- **25. 03. 2022 – AH's corrected exhibit list ([AH-corrected-exhibit-list](#)) ✓**
- **25. 03. 2022 – AH's objections to JD's counter-designations & rebuttal designations ([AH-objections-JD-rebuttal-depositions](#)) ✓**
- **28. 03. 2022 – AH's objections to JD's rebuttal deposition designations & sur-rebuttal designations ([AH-objections-JD-rebuttal-depositions](#)) ✓**
- **29. 03. 2022 – order about courtroom regulations ([jpg](#)) ✓**
- **29. 03. 2022 – AH's objections to JD's witnesses ([AH-objections-JD-witnesses](#)) ✓**
- **29. 03. 2022 – AH's objections to JD's exhibits ([AH-objections-JD-exhibits](#)) ✓**
- **29. 03. 2022 – JD's objections tp AH's witness list ([JD-objections-AH-witnesses](#)) ✓**
- **29. 03. 2022 – JD's objections to AH's exhibit list ([JD-objections-AH-exhibits](#)) ✓**

- **01. 04. 2022** – JD's motion and application to admit Rebecca Lecaroz as co-counsel ([pdf](#))
- **01. 04. 2022** – order admitting Rebecca Lecaroz as counsel for JD ([pdf](#)) ✓
- **06. 04. 2022** – notice of appearance of Elaine McCafferty as co-counsel for AH ([pdf](#))
- **08. 04. 2022** – application to appear pro hac vice for Yarelyn Mena ([pdf](#))
- **08. 04. 2022** – motion to admit pro hac vicae Yarelyn Mena ([pdf](#))
- **08. 04. 2022** – order to admit pro hac vicae Yarelyn Mena ([pdf](#))
- **08. 04. 2022** – **AH's second supplemental exhibit list** ([AH-2nd-supplemental-exhibit-list](#))
- **11. 04. – 06. 05. & 16. – 27. 05. 2022 trial**
- **11. 04. 2022 – day 1: jury selection**
 - live streams: [Stevie J Raw](#)
 - recaps: [popcorn planet](#) (with guests)
- **12. 04. 2022 – day 2: opening statements, JD's sister Christi Dembrowski** (direct, cross)
 - live streams: come geek some / [SEC](#) / [Stevie J Raw](#) (commentary during pauses only), [Auditing the Absurd](#) (commentary), Emily D. Baker (funny legal commentary), [legalbytes part 1](#) & [legalbytes part 2](#) (legal commentary), Rakieta Law (legal commentary), TUG (commentary)
 - recaps: [Auditing the Absurd](#), Emily D. Baker, [legalbytes](#), [popcorn planet](#) (with guests), popcorn planet
- **13. 04. 2022 – JD's evidence**
 - Plt116-CL20192911-041322.jpg ([pdf](#)) – [plan](#) of PHs
- **12. 04. 2022 – AH's evidence**
 - Def214-CL20192911-041222.pdf ([pdf](#)) – texts between JD and Christi Dembrowski from 5. 2. 2014
 - Def210-CL20192911-041222.pdf ([pdf](#)) – texts between AH and Christi Dembrowski from 3. 2. 2014
- **13. 04. 2022 – day 3: Christi Dembrowski** (cross), **JD's friend artist Isaac Baruch** (direct, cross), **ECB manager Brandon Patterson** (deposition)
 - live streams: [come geek some](#) / [Doctor Soup](#) / [SEC](#) / [Stevie J Raw](#) (commentary during pauses only), [Auditing the Absurd](#) (commentary), Emily D. Baker (funny legal commentary), [legalbytes](#) (legal commentary), Rakieta Law (legal commentary), TUG (commentary)
 - recaps: [Auditing the Absurd](#), [legalbytes](#), [popcorn planet](#) (with guests)
- **13. 04. 2022 – JD's evidence**
 - [note: video clips download first then can be viewed; also, I haven't corrected the time stamps on camera 2 in the PH elevator, but it's obvious from the comparisons that the camera is ca. 6 mins late]
 - [I thought that elevator was only heading to PHs floor, there's a lot of traffic on it]
 - Plt250-CL20192911-041322.avi ([video](#))

- Plt251-CL20192911-041322.avi ([video](#))
- Plt252-CL20192911-041322.avi ([video](#))
- Plt253-CL20192911-041322.avi ([video](#))
- Plt254-CL20192911-041322.avi ([video](#))
- Plt255-CL20192911-041322.avi ([video](#))
- Plt256-CL20192911-041322.avi ([video](#))
- Plt257-CL20192911-041322.avi ([video](#))
- Plt258-CL20192911-041322.avi ([video](#))
- Plt259-CL20192911-041322.avi ([video](#))
- Plt260-CL20192911-041322.avi ([video](#))
- Plt261-CL20192911-041322.avi ([video](#))
- Plt262-CL20192911-041322.avi ([video](#))
- Plt263-CL20192911-041322.avi ([video](#))
- Plt264-CL20192911-041322.avi ([video](#))
- Plt265-CL20192911-041322.avi ([video](#))
- Plt266-CL20192911-041322.avi ([video](#))
- Plt267-CL20192911-041322.avi ([video](#))
- Plt268-CL20192911-041322.avi ([video](#))
- Plt269-CL20192911-041322.avi ([video](#))
- Plt270-CL20192911-041322.avi ([video](#))
- Plt271-CL20192911-041322.avi ([video](#))
- Plt272-CL20192911-041322.avi ([video](#))
- Plt273-CL20192911-041322.avi ([video](#))
- Plt274-CL20192911-041322.avi ([video](#))
- Plt275-CL20192911-041322.avi ([video](#))
- Plt276-CL20192911-041322.avi ([video](#))
- Plt277-CL20192911-041322.avi ([video](#))
- Plt278-CL20192911-041322.avi ([video](#))
- Plt279-CL20192911-041322.avi ([video](#))
- Plt280-CL20192911-041322.avi ([video](#))
- Plt281-CL20192911-041322.avi ([video](#))
- Plt282-CL20192911-041322.avi ([video](#))
- Plt283-CL20192911-041322.avi ([video](#))
- Plt284-CL20192911-041322.avi ([video](#))
- Plt285-CL20192911-041322.avi ([video](#))
- Plt286-CL20192911-041322.avi ([video](#))
- Plt287-CL20192911-041322.avi ([video](#))
- Plt288-CL20192911-041322.avi ([video](#))
- Plt289-CL20192911-041322.avi ([video](#))
- Plt290-CL20192911-041322.avi ([video](#))
- Plt291-CL20192911-041322.avi ([video](#))
- Plt292-CL20192911-041322.avi ([video](#))
- Plt293-CL20192911-041322.avi ([video](#))
- Plt294-CL20192911-041322.avi ([video](#))

- Plt295-CL20192911-041322.avi ([video](#))
 - Plt296-CL20192911-041322.avi ([video](#))
 - Plt297-CL20192911-041322.avi ([video](#))
 - Plt298-CL20192911-041322.avi ([video](#))
 - Plt299-CL20192911-041322.avi ([video](#))
 - Plt300-CL20192911-041322.avi ([video](#))
 - Plt301-CL20192911-041322.avi ([video](#))
 - Plt302-CL20192911-041322.avi ([video](#))
 - Plt303-CL20192911-041322.avi ([video](#))
 - Plt304-CL20192911-041322.avi ([video](#))
 - Plt305-CL20192911-041322.avi ([video](#)) [21. 5., 20:28:45 – 20:34:34, camera 2]
 - Plt306-CL20192911-041322.avi ([video](#)) [21. 5., 20:59:20 – 20:59:29, camera 2]
 - Plt307-CL20192911-041322.avi ([video](#)) [21. 5., 21:17:35 – 21:17:47, camera 2]
 - Plt308-CL20192911-041322.avi ([video](#)) [21. 5., 22:23:00 – 22:23:49, camera 2]
 - Plt309-CL20192911-041322.avi ([video](#)) [21. 5., 18:51:01 – 18:57:54, camera 4]
 - Plt310-CL20192911-041322.avi ([video](#)) [21. 5., 18:52:00 – 18:57:59, camera 13]
 - Plt311-CL20192911-041322.avi ([video](#)) [21. 5., 19:00:00 – 19:05:59, camera 2]
 - Plt312-CL20192911-041322.avi ([video](#)) [21. 5., 20:28, file not working]
 - Plt313-CL20192911-041322.avi ([video](#)) [21. 5., 18:48:00 – 18:58:34, camera 2]
 - Plt314-CL20192911-041322.avi ([video](#)) [21. 5., 18:48:01 – 18:58:59, camera 16]
 - Plt315-CL20192911-041322.avi ([video](#)) [21. 5., 18:48:05 – 18:54:49, camera 14]
 - Plt316-CL20192911-041322.avi ([video](#)) [21. 5., 20:19:21 – 20:26:49, camera 14]
 - Plt317-CL20192911-041322.avi ([video](#)) [21. 5., 20:20:01 – 20:30:59, camera 16]
 - Plt318-CL20192911-041322.avi ([video](#)) [21. 5., 20:20:25 – 20:26:44, camera 2]
 - Plt319-CL20192911-041322.avi ([video](#)) [21. 5., 20:18:45 – 20:23:54, camera 13]
 - Plt320-CL20192911-041322.avi ([video](#)) [21. 5., 20:18:35 – 20:23:59, camera 4]
 - Plt321-CL20192911-041322.avi ([video](#)) [21. 5., 20:52:00 – 21:03:59, camera 6]
 - Plt322-CL20192911-041322.avi ([video](#)) [21. 5., 20:53:01 – 21:04:54, camera 7]
 - Plt323-CL20192911-041322.avi ([video](#)) [21. 5., 20:53:01 – 21:04:59, camera 1]
 - Plt324-CL20192911-041322.avi ([video](#)) [21. 5., 21:00:00 – 21:05:39, camera 2]
 - Plt325-CL20192911-041322.avi ([video](#)) [21. 5., 21:17:35 – 21:22:59, camera 2]
 - Plt326-CL20192911-041322.avi ([video](#)) [21. 5., 21:11:30 – 21:19:59, camera 1]
 - Plt327-CL20192911-041322.avi ([video](#)) [21. 5., 21:10:01 – 21:19:59, camera 7]
 - Plt328-CL20192911-041322.avi ([video](#)) [21. 5., 21:10:01 – 21:19:59, camera 6]
 - Plt329-CL20192911-041322.avi ([video](#)) [21. 5., 22:15:00 – 22:26:59, camera 6]
 - Plt330-CL20192911-041322.avi ([video](#)) [21. 5., 22:15:05 – 22:26:59, camera 7]
 - Plt331-CL20192911-041322.avi ([video](#)) [21. 5., 22:16:06 – 22:26:44, camera 1]
 - Plt332-CL20192911-041322.avi ([video](#)) [21. 5., 22:22:40 – 22:34:59, camera 2]
 - Plt333-CL20192911-041322.avi ([video](#)) [21. 5., 22:28:00 – 22:36:49, camera 2]
 - Plt334-CL20192911-041322.avi ([video](#)) [21. 5., 22:24:00 – 22:35:59, camera 1]
 - Plt335-CL20192911-041322.avi ([video](#)) [21. 5., 22:24:02 – 22:35:24, camera 7]
 - Plt336-CL20192911-041322.avi ([video](#)) [21. 5., 22:25:01 – 22:35:59, camera]
- **13. 04. 2022 – AH's evidence**
 - Def666-CL20192911-041322.avi ([video](#)) [21. 5., 20:28:46 – 20:28:48, camera 4]

- Def668-CL20192911-041322.avi ([video](#)) [21. 5., 21:17:35 – 21:27:59, camera 2]
- Def669-CL20192911-041322.avi ([video](#)) [21. 5., 22:23:00 – 22:36:49, camera 2]
- Def670-CL20192911-041322.avi ([video](#)) [21. 5., 18:51:01 – 18:57:54, camera 4]
- Def671-CL20192911-041322.avi ([video](#)) [21. 5., 18:52:01 – 18:57:59, camera 13]
- Def672-CL20192911-041322.avi ([video](#)) [21. 5., 19:00:00 – 19:05:59, camera 2]
- Def673-CL20192911-041322.avi ([video](#)) [21. 5., 20:28, file not working]
- Def680-CL20192911-041322.avi ([video](#)) [21. 5., 20:18:45 – 20:23:54, camera 13]
- Def681-CL20192911-041322.avi ([video](#)) [21. 5., 20:18:35 – 20:23:59, camera 4]
- Def682-CL20192911-041322.avi ([video](#)) [21. 5., 20:52:00 – 21:03:59, camera 6]
- Def683-CL20192911-041322.avi ([video](#)) [21. 5., 20:53:01 – 21:04:54, camera 7]
- Def684-CL20192911-041322.avi ([video](#)) [21. 5., 20:53:01 – 21:04:59, camera 1]
- Def685-CL20192911-041322.avi ([video](#)) [21. 5., 21:00:00 – 21:05:39, camera 2]
- Def686-CL20192911-041322.avi ([video](#)) [21. 5., 21:17:35 – 21:22:59, camera 2]
- Def687-CL20192911-041322.avi ([video](#)) [21. 5., 21:11:30 – 21:19:59, camera 1]
- Def688-CL20192911-041322.avi ([video](#)) [21. 5., 21:10:00 – 21:19:59, camera 7]
- Def690-CL20192911-041322.avi ([video](#)) [21. 5., 22:15:00 – 22:26:59, camera 6]
- Def691-CL20192911-041322.avi ([video](#)) [21. 5., 22:15:05 – 22:26:59, camera 7]
- Def692-CL20192911-041322.avi ([video](#)) [21. 5., 22:16:06 – 22:26:44, camera 1]
- Def693-CL20192911-041322.avi ([video](#)) [21. 5., 22:22:40 – 22:34:59, camera 2]
- Def694-CL20192911-041322.avi ([video](#)) [21. 5., 22:28:00 – 22:36:49, camera 2]
- Def695-CL20192911-041322.avi ([video](#)) [21. 5., 22:24:00 – 22:35:59, camera 1]
- Def696-CL20192911-041322.avi ([video](#)) [21. 5., 22:24:01 – 22:35:24, camera 7]
- Def729-CL20192911-041322.avi ([video](#)) [21. 5., 22:25:00 – 22:25:59, camera 6]
- Def743-CL20192911-041322.avi (video)
- Def744-CL20192911-041322.avi (video)
- Def745-CL20192911-041322.avi (video)
- Def746-CL20192911-041322.avi (video)
- Def750-CL20192911-041322.avi (video)
- Def751-CL20192911-041322.avi (video)
- Def752-CL20192911-041322.avi (video)
- Def753-CL20192911-041322.avi (video)
- Def755-CL20192911-041322.avi (video)
- Def780G-CL20192911-041322.avi (video)
- Def780R-CL20192911-041322.avi (video)
- Def780X-CL20192911-041322.avi (video)
- Def789A-CL20192911-041322.avi ([video](#))
- Def789B-CL20192911-041322.avi ([video](#))
- Def789G-CL20192911-041322.avi ([video](#))
- Def789H-CL20192911-041322.avi ([video](#))
- Def789L-CL20192911-041322.avi ([video](#))
- Def789N-CL20192911-041322.avi ([video](#))
- Def789R-CL20192911-041322.avi ([video](#))
- Def974-CL20192911-041322.pdf ([pdf](#)) – [plan](#) of PHs
- Def1041-CL20192911-041322.pdf ([pdf](#)) – plan of PH3

- **14. 04. 2022 – day 4: AH's personal assistant Kate James** (deposition), **couples therapist Lauren Anderson** (deposition), **JD's social media manager Gina Deuters** (striked, direct), **addiction specialist doctor David Kipper** (deposition)
 - live streams: [SEC](#) / [Stevie J Raw](#) (commentary during pauses only), [Auditing the Absurd](#) (commentary), Emily D. Baker (funny legal commentary), [legalbytes](#) (legal commentary), Rakieta Law (legal commentary), TUG (commentary)
 - recaps: [Auditing the Absurd](#), legalbytes, [popcorn planet](#) (with guests)
 - week 1 recaps: Colonel Kurtz, Doctor Soup, eHacker, [legalbytes](#), [popcorn planet & Andrea Burkhart](#), [Stevie J Raw & legalbytes](#), [Stevie J Raw & Lost Beyond Pluto](#)
 - transcript and analysis of Lauren Anderson's testimony, by [Ann Silvers](#)
 - [IG post](#) for which Gina Deuters was striked which was presented to AH's counsel by Eve Barlow, and which turned out to be a redacted [IG post](#) from 8. 1. 2021
- **14. 04. 2022 – AH's evidence**
 - Def397-CL20192911-041422.pdf ([pdf](#)) – email from Christian Carino to Laurel Anderson from 19. 3. 2015
 - Def844-CL20192911-041422.pdf ([pdf](#)) – text from JD to Kate James from 13.8. 2016
- **15. 04. 2022 – hearing regarding Eve Barlow** ([jpg1](#), [jpg2](#), [jpg3](#), [jpg4](#))
- **15. 04. 2022 – order excluding Eve Barlow from court for the duration of the trial** ([pdf](#))
- **18. 04. 2022 – day 5: addiction specialist doctor David Kipper** (deposition), **registered nurse Debbie Lloyd** (deposition), **JD's security Sean Bett** (direct)
 - live streams: [SEC](#) / [Stevie J Raw](#) (commentary during pauses only), [Auditing the Absurd](#) (commentary), Emily D. Baker (funny legal commentary), [legalbytes](#) (legal commentary), Rakieta Law (legal commentary), TUG (commentary)
 - recaps: [Auditing the Absurd](#), [legalbytes](#), popcorn planet (with guests)
- **JD's evidence**
 - Plt48-CL20192911-041822.pdf ([pdf](#)) – email from AH to dr. Kipper from 8. 8. 2016
 - Plt49-CL20192911-041822.avi ([video](#)) – 0:24, video of Bahamas' home
 - Plt65-CL20192911-041822.pdf ([pdf](#)) – [photo 1](#), [photo 2](#), and [photo 3](#) of JD's scratched face from 15. 12. 2015
 - Plt146-CL20192911-041822.pdf ([pdf](#)) – [photo](#) of JD with a swollen bruise on L cheek from 23. 3. 2015
 - Plt548-CL20192911-041822.pdf ([pdf](#)) – Cellebrite Report for Isaac Baruch: texts from JD to Mr. Baruch from 18. 10. 2016
- **AH's evidence**
 - Def283-CL20192911-041822.pdf ([pdf](#)) – text messages between JD and nurse Debbie from 26. 8. 2014
 - Def304-CL20192911-041822.pdf ([pdf](#)) texts between JD and nurse Debbie from 11. 11. 2014 [suspicion of AH cheating at a wrap party]
 - Def405-CL20192911-041822.pdf ([pdf](#)) – texts between JD and nurse Debbie from 27. 3. 2015 [infected finger]

- Def455-CL20192911-041822.pdf ([pdf](#)) – texts between JD and nurse Debbie from 5. 7. 2015
- Def1063-CL20192911-041822.pdf ([pdf](#)) – texts between JD and dr. Kipper from 21. 8., 24. 8., 17. 11. 2014 and 7. 3. 5:00:53 PM/UTC-8 [AH's harrasment, rants and obsession with herself; cut the top of my middle finger off], 19. 3., 15. 4., 28. 6., 1. 7. [abuse starts again after 3 to 4 perfect months], 5. 7. and 3. 8. 2015
- **18. 04. 2022 – application by media to receive daily transcripts ([pdf](#))**
- **19. 04. 2022 – day 6: JD's security Sean Bett (cross), JD's friend sound manager Keenan Wyatt (direct, cross), Johnny Depp (direct)**
 - live streams: [some geek some](#) / [SEC](#) / [Stevie J Raw](#) (commentary during pauses only), Auditing the Absurd (commentary), Emily D. Baker (funny legal commentary), [legalbytes](#) (legal commentary), Rakieta Law (legal commentary), TUG (commentary)
 - recaps: [legalbytes](#), popcorn planet (with guests)
 - [Johnny Depp's testimony](#)
- **20. 04. 2022 – day 7: Johnny Depp (direct)**
 - live streams: [Doctor Soup](#) / [SEC](#) / [Stevie J Raw](#) (commentary during pauses only), Auditing the Absurd (commentary), Emily D. Baker (funny legal commentary), [legalbytes](#) (legal commentary), Rakieta Law (legal commentary), TUG (commentary)
 - recaps: [legalbytes](#), popcorn planet (with guests)
- **20. 04. 2022 – JD's evidence**
 - Plt2-CL20192911-042022.pdf ([pdf](#)) – printed version of the Op-Ed
 - Plt61-CL20192911-042022.pdf ([pdf](#)) – photos of JD's injured finger, [pink 'cast'](#), MRSA infection
 - Plt92-CL20192911-042022.pdf ([pdf](#)) – [photo](#) of knife blade gifted by AH to JD, with inscription 'hasta la muerte xx Slim' = 'till death, love, Amber'
 - Plt93-CL20192911-042022.pdf ([pdf](#)) – [photo](#) of knife gifted by AH to JD
 - Plt144-CL20192911-042022.pdf ([pdf](#)) – photo of JD's injured finger
 - Plt145-CL20192911-042022.pdf ([pdf](#)) – [photo](#) of JD in ER in Australia
 - Plt343-CL20192911-042022.avi ([audio](#)) [4:20:48, longer version of previously released 2h recording from 25. 9. 2015]
 - Plt397-CL20192911-042022.avi ([audio](#)) [1:09:26]
 - Plt408-CL20192911-042022.pdf ([pdf](#)) – article *Amber Heard's Lawyer Apologizes to Johnny Depp for Saying Actress Was 'Vindicated' Following Divorce Settlement* by Jodu Guglielmi for [People](#) from 17. 8. 2016, 12:15
 - Plt409-CL20192911-042022.pdf ([pdf](#)) – article *New Photos Show Amber Heard's Injuries Allegedly Caused by Johnny Depp in Another Domestic Violence Incident* by Samantha Miller for [People](#) from 1. 6. 2016, 6:30
 - Plt411-CL20192911-042022.pdf ([pdf](#)) – article *Amber Heard Granted Restraining Order Against Johnny Depp After Domestic Violence Accusations* by Ryan Parker for [The Hollywood Reporter](#) from 27. 5. 2016, 10:25

- Plt414-CL20192911-042022.pdf ([pdf](#)) – article *Amber Heard Claims Johnny's Violence Triggered by Drug, Alcohol Abuse* for [TMZ](#) from 27. 5. 2016, 12:23 PT
- Plt487A-CL20192911-042022.pdf ([pdf](#)) – Celebrite Report: texts between JD and AH from 23. – 25. 5. 2016 which include the text ([text1](#), [text2](#), [text3](#), [text4](#)) about the [extortion letter](#)
- **20. 04. 2022 – AH's evidence**
 - Def1458-CL20192911-042022 ([pdf](#)) – Deal Point Memorandum from 15. 8. 2016
- **21. 04. 2022 – day 8: Johnny Depp (cross)**
 - live streams: [SEC](#) / [Stevie J Raw](#) (commentary during pauses only), Auditing the Absurd (commentary), Emily D. Baker (funny legal commentary), [legalbytes](#) (legal commentary), Rakieta Law (legal commentary), TUG (commentary)
 - recaps: [legalbytes](#), popcorn planet (with guests)
 - week 2 recaps: [legalbytes](#)
- **21. 04. 2022 – JD's evidence**
 - Plt120A-CL20192911-042122.pdf ([pdf](#)) – text from JD to Paige Heard from 19. 8. 2014
 - Plt157A-CL20192911-042122.pdf ([pdf](#)) – texts from JD to Mr. Baruch from 17. and 18. 10. 2016
 - Plt380A-CL20192911-042122.m4a ([audio](#)) – 0:26, from 8. 3. 2015 in Australia
 - Plt396A--CL20192911-042122.m4a ([audio](#)) – 20:04 – 20:23, JD vomiting
 - Plt396A--CL20192911-042122.m4a ([audio](#)) – 7:09 – 7:19, JD: I'm not a cunt, I fucking hate you
- **21. 04. 2022 – AH's evidence**
 - Def143-CL20192911-042122.pdf ([pdf](#)) – emails between JD and Stephen Deuters from 19. 4. 2012
 - Def145-CL20192911-042122.pdf ([pdf](#)) – texts from JD to Christi Dembrowski and Brian Warner from 11. 9. 2012
 - Def159A-CL20192911-042122.pdf ([pdf](#)) – text from JD to Christi Debrowski from 9. 3. 2013
 - Def152-CL20192911-042122.pdf ([pdf](#)) – texts between JD and Stephen Deuters from 4. 8. 2012
 - Def153-CL20192911-042122.pdf ([pdf](#)) – texts from JD to Vanessa Paradis and Christi Dembrowski from 17. 1. 2013
 - Def161-CL20192911-042122.pdf ([pdf](#)) – texts between JD and AH from 12. 3. 2013
 - Def175-CL20192911-042122.pdf ([pdf](#)) – email chain between Bruce Witkin to JD from 5. 6. to 7. 6. 2013
 - Def178-CL20192911-042122.pdf ([pdf](#)) – texts between JD and Paul Bettany from 11. 6. 2013
 - Def180-CL20192911-042122.pdf ([pdf](#)) – texts between JD and AH from 9. 7. 2013 (display of guilt and matronliness as lesbian camp councilor)
 - Def181-CL20192911-042122.pdf ([pdf](#)) – texts between Christi Dembrowski and JD from 10. 7. 2013

- Def182-CL20192911-042122.pdf ([pdf](#)) – email from JD to Elton John from 31. 7. 2013
- Def186A-CL20192911-042122.pdf ([pdf](#)) – texts between JD and AH from 6. 9. 2013
- Def196A-CL20192911-042122.pdf ([pdf](#)) – text from JD to Stephen Deuters from 31. 10. 2013
- Def221-CL20192911-042122.m4a ([audio](#)) – 11:39, according to AH, Boston plane recording from 24. 5. 2014, JD says probably detox on 8. 2014
- Def236-CL20192911-042122.pdf ([pdf](#)) – texts from JD to AH from 25. 5. 2014
- Def245-CL20192911-042122.pdf ([pdf](#)) – texts from JD to Paul Bettany and Christi Dembrowski from 30. 5. 2014, Kevin Murphy and Christi Dembrowski from 2. 6. 2014, Patti Smith from 8. 6. 2014, and Stephen Deuters from 24. 7. 2014
- Def293A-CL20192911-042122.pdf ([pdf](#)) – text from JD to Christo Dembrowski from 4. 10. 2014
- Def325-CL20192911-042122.pdf ([pdf](#)) – texts between JD and AH from 18. 12. 2014
- Def346-CL20192911-042122.pdf ([pdf](#)) – text from JD to Nathan Holmes from 26. 2. 2015
- Def349-CL20192911-042122.pdf ([pdf](#)) – text from JD to Stephen Deuters from 28. 2. 2015
- Def350-CL20192911-042122.pdf ([pdf](#)) – texts from JD to Stephen Deuters from 5. 3. 2015, and to Stephen Deuters and Christi Dembrowski from 6. 3. 2015
- Def353-CL20192911-042122.pdf ([pdf](#)) – texts between JD and Nathan Holes from 2. and 7. 3. 2015, and 27. 4. 2015
- Def374-CL20192911-042122.pdf ([pdf](#)) – [photo](#) 3 of mirrors in Australia
- Def375-CL20192911-042122.pdf ([pdf](#)) – [photo](#) 2 of mirrors in Australia
- Def377-CL20192911-042122.pdf ([pdf](#)) – [photo](#) of lampshade written over, Australia
- Def398-CL20192911-042122.pdf ([pdf](#)) – text from JD to dr. Kipper from 19. 3. 2015
- Def408-CL20192911-042122.pdf ([pdf](#)) – texts between Christi Dembrowski and JD from 9. 4. 2015
- Def427-CL20192911-042122.pdf ([pdf](#)) – text between Jerry Judge and JD from 26. 4. 2015
- Def435-CL20192911-042122.pdf ([pdf](#)) – text from JD to Stephen Deuters and Christi Dembrowski from 14. 5. 2105
- Def445-CL20192911-042122.pdf ([pdf](#)) – text from JD to dr. Kipper from 28. 6. 2015
- Def485A-CL20192911-042122.pdf ([pdf](#)) – texts between JD and AH from 28. 9. 2015
- Def449-CL20192911-042122.pdf ([pdf](#)) – text from JD to nurse Erin from 31. 10. 2015
- Def580-CL20192911-042122.pdf ([pdf](#)) – text from JD to David Heard from 30. 12. 2015
- Def586A-CL20192911-042122.m4a ([audio](#)) – 5:54
- Def587A-CL20192911-042122.m4a ([audio](#)) – 0:35, arguing about screaming
- Def598A-CL20192911-042122.m4a ([audio](#)) – 1:30, AH recounting her alleged injuries seen by witnesses

- Def638-CL20192911-042122.mov ([video](#)) – the whole kitchen video, according to texts presented by AH from 10. 2. 2016
- Def736-CL20192911-042122.pdf ([pdf](#)) – texts between JD and AH from 22. 5. 2016
- Def771-CL20192911-042122.pdf ([pdf](#)) – text from JD to AH from 22. 5. 2016
- Def839-CL20192911-042122.m4a ([audio](#)) – 13:46, according to AH from 7. 2016
- Def866-CL20192911-042122.pdf ([pdf](#)) – texts between nurse Erin and JD from 30. 8., 6. 9., and 7. 9. 2016
- Def1085-CL20192911-042122.pdf ([pdf](#)) – [photo](#) of staged drug scene with JD's box from 3. 2015
- Def1089-CL20192911-042122.pdf ([pdf](#)) – [photo](#) of bags of marijuana
- Def1094-CL20192911-042122.pdf ([pdf](#)) – [photo](#) of JD sleaping with ice cream
- **25. 04. 2022 – day 9: Johnny Depp** (cross, redirect), **Ben King** (direct, cross)
 - live streams: [SEC](#) / [Stevie J Raw](#) (commentary during pauses only), Auditing the Absurd (commentary), Emily D. Baker (funny legal commentary), [legalbytes](#) (legal commentary), Rakieta Law (legal commentary), TUG (commentary)
 - recaps: [legalbytes](#), popcorn planet (with guests)
- **25. 04. 2022 – JD's evidence**
 - Plt1-CL20192911-042522.pdf ([pdf](#)) – article *Amber Heard: I spoke up against sexual violence – and faced our culture's wrath. That has to change* by Amber Heard for [Washington Post](#) from 18. 12. 2018
 - Plt120B-CL20192911-042522.pdf ([pdf](#)) – text from JD to Paige Heard from 19. 8. 2014
 - Plt159-CL20192911-042522.pdf ([pdf](#)) – Australia house plans
 - Plt365-CL20192911-042522.avi ([audio](#)) – 0:46, according to AH's exhibit list from 31. 12. 2015
 - Plt366-CL20192911-042522.avi ([audio](#)) – 3:38
 - Plt396B-CL20192911-042522.m4a ([audio](#)) – 2:44:00 – 2:44:16, this is not helping
 - Plt396B-CL20192911-042522.m4a ([audio](#)) – 2:49:30 – 2:49:55, JD leaves
- **25. 04. 2022 – AH's evidence**
 - Def207-CL20192911-042522.pdf ([pdf](#)) – text from JD to Kevin Murphy and Christi Dembrowski from 21. 1. 2014
 - Def213-CL20192911-042522.pdf ([pdf](#)) – text from JD to Bruce Witkin from 4. 2. 2014
 - Def376C-CL20192911-042522.pdf ([pdf](#)) – AH with three cuts on left forearm, another [photo](#) from the same event, the Tribeca Film Festival in 4. 2015
 - Def376G-CL20192911-042522.pdf ([pdf](#)) – photo of cuts from the same event
 - Def394-CL20192911-042522.pdf ([pdf](#)) – text from JD to dr. Kipper from 7. 3. 2015
 - Def740-CL20192911-042522.pdf ([pdf](#)) – text from JD to Stephen Deuters and Christi Dembrowski from 3. 9. 2015
 - Def581-CL20192911-042522.avi ([audio](#)) – 0:44, from 31. 12. 2016
 - Def582-CL20192911-042522.m4a ([audio](#)) – 0:11, cigarette
 - Def587B-CL20192911-042522.m4a ([audio](#)) – 19:40 – 19:53, AH crying
 - Def587B-CL20192911-042522.m4a ([audio](#)) – 23:04 – 23:29, coke & booze

- Def586B-CL20192911-042522.m4a ([audio](#)) – 0:45
- Def598B-CL20192911-042522.m4a ([audio](#)) – 0:00 – 0:20, illegal recording
- Def598B-CL20192911-042522.m4a ([audio](#)) – 30:02 – 31:34, walking away instead of 'working it out' (fighting)
- Def620-CL20192911-042522.pdf ([pdf](#)) – text from JD to Malcolm Connolly from 20. 1. 2016
- **25. 04. 2022 – motion and application to appear pro hac vice for Wayne Dennison ([pdf](#))**
 - application (p. 6 – 10 of pdf, exhibit A)
- **26. 04. 2022 – day 10: Tara Roberts** (live video link, direct, cross, redirect), **clinical and forensic psychologist dr. Shannon Curry** (direct, cross, redirect), **LAPD officer Melissa Saenz** (deposition)
 - live streams: [come geek some](#) (commentary during pauses only), Auditing the Absurd (commentary), Emily D. Baker (funny legal commentary), [legalbytes](#) (legal commentary), Rakieta Law (legal commentary), TUG (commentary)
 - recaps: legalbytes, popcorn planet (with guests)
- **26. 04. 2022 – JD's evidence**
 - Plt348-CL20192911-042622.m4a ([video](#)) – second video of Bahamas, closet
- **27. 04. 2022 – day 11: LAPD officer Tyler Hadden** (deposition), **LAPD officer William Gatlin** (deposition), **Eastern's concierge Alejandro Romero** (deposition), **former AH's and JD's talent agent Christian Carino** (deposition), **JD's divorce lawyer Laura Wasser** (deposition)
 - live streams: come geek some (commentary during pauses only), Auditing the Absurd (commentary), Emily D. Baker (funny legal commentary), legalbytes (legal commentary), Rakieta Law (legal commentary), TUG (commentary)
- **27. 04. 2022 – JD's evidence**
 - Plt200-CL20192911-042722.mp4 ([video](#)) – bodycam footage of William Gatlin
 - Plt201-CL20192911-042722.mp4 ([video](#)) – bodycam footage of Christopher Diener

Analysis

- explanations of some of the legal terminology, courts, attorneys, and process, by Linda, were posted by [SEC](#) in *Why Is Amber Heard Resisting Giving Her Evidence?* (7:15, 30. 12. 2021)
- updates on the VA trial and pre-trial happenings were explained by Linda and posted by [SEC](#) in *The Road to Virginia* (30:09, 14. 1. 2022)
- trial proceedings in VA courts explained by Andrea Burkhart in live stream *Lawyer Discusses Depp v Heard Trial And What Comes Next* posted by [Stevie J Raw](#) (1:37:49, 23. 3. 2022) and in live stream *A Discussion with Attorney Andrea Burkhart* posted by [LegalBytes](#) (1:32:40, 29. 3. 2022)

- **JD's injuries and demeanor** compilation videos by Ashley Quinn: [video 1](#) (5:04, 28. 3. 2022), [video 2](#) (2:20, 28. 3. 2022), [video 3](#) (1:48, 1. 4. 2022), [video 4](#) (1:37, 1. 4. 2022), [video 5](#) (3:49, 5. 4. 2022), [video 6](#) (3:43, 6. 4. 2022), [video 7](#) (2:04, 7. 4. 2022), [video 8](#) (8:42, 12. 4. 2022)