

On behalf of: Claimant
Witness: John Christopher Depp II
No: Third
Date: 25 February 2020

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

Claim No. QB-2018-006323

JOHN CHRISTOPHER DEPP II

Claimant

-and-

(1) NEWS GROUP NEWSPAPERS LTD

(2) DAN WOOTTON

Defendants

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

I, **JOHN CHRISTOPHER DEPP II**, of [REDACTED] Sweetzer Avenue, LA 90069, USA, **WILL SAY** as follows:

1. I am the Claimant in these proceedings.
2. Unless stated otherwise, the facts and matters referred to in this witness statement are within my own knowledge and true or are true to the best of my knowledge, information and belief based on sources stated within this witness statement.
3. I make this witness statement in support of my claim in these proceedings and in response to the Defendants' witness statements served on 16 December 2019 and the Re-Amended Defence served on 13 February 2020. I have already set out my position in respect of the

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various incidents alleged by the Defendants' and my recollection of the relevant events in a detailed witness statement dated 12 December 2019. As a result, I have not addressed here all of the allegations made by the Defendants' witnesses in their witness statements. Instead, I will address only those allegations that are new which I have not had a chance to properly describe in my second witness statement. However, the fact that I have not addressed some of the allegations does not mean that I accept them or the Defendants' version of events. I do not.

Witness Statement of Amber Heard

4. In her witness statement dated 15 December 2019, Amber makes a number of new allegations which I wish to respond to.

Allegations of Overbearing Behaviour

5. I do not believe that I have an overbearing, manipulative or controlling personality, or that anyone who knows me well would describe me that way. In contrast, I believe that Amber had an obsessive need to control me and all situations in our relationship. I truly believe that most of the descriptions Amber provides are in fact reflections of her own behavior.
6. In the tapes of my conversations with Amber that have now been disclosed, it is clear that Amber spoke to me as an aggressor, and not as she has described herself, someone who feared for her life. The hours of recordings reveal the true nature and dynamic of our relationship, including Amber's confessions of serial violence against me, the threat that nobody will believe I am a victim of domestic violence, and her own acknowledgment that she could not control her violence.

Alleged first violent incident in early 2013

7. I do not recall any argument about my tattoo. I understand that Amber has now added the allegation that I also hit her with an open hand. I did not hit Amber with an open hand, or in any other way.
8. I repeat what I said in my second witness statement about the remainder of this alleged incident.

Painting Incident, March 2013

9. I have already explained what happened in relation to this allegation in paragraph 34 of my second witness statement. I never hit Amber or tried to set fire to the painting. The painting had been done by one of her exes and it was right in my eye-line as soon as I woke up when I was staying at her house. I told her nicely that I would prefer not to wake up to art by her ex-wife, and so I asked her calmly and respectfully whether she would do me the courtesy of moving it to another spot in her place. 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.
10. Unfortunately, her reaction was extreme and violent, accusing me of being insecure and childish, and so I quickly decided to drop the matter.
11. At paragraphs 57 and 60 of Amber's statement, she says that I was late for the filming of a Keith Richards documentary because I would not leave her house. That is not true. I do remember at one point being late to film the documentary I was making about Keith Richards because she and I were arguing. But to the best of my recollection, this argument was 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, which I found out was untrue.
12. At paragraph 61 of Amber's statement, she claims that I held one of our dogs, Boo, out of the window of a moving car, while I howled like a dog. This absurd, invented scenario never happened. I would never hold a dog or any other living being out of the window of a moving car. It is also unlikely that we would have even taken dogs with us to the filming as it was at a small enclosed space. It is also very rare for me to travel with the window of a car open as I have always tried my best not to be recognised, especially in LA. The windows of the car that I drive in LA are tinted and I generally do not open them except to smoke, and then I will only crack the window.
13. These dogs are the same Teacup Yorkshire terriers that Amber has claimed at times were responsible for the feces left on my bed. Amber also confessed to our property manager Kevin Murphy that the poop on my bed was "just a harmless prank" that she had done. I attach photographs of these dogs in my Exhibit to show how small the dogs are. They are so small they need to be lifted up to get up a stair, and certainly cannot climb a bed by themselves. Nor would they be left on the bed alone, because they are too small to get down, and quite delicate dogs. Their droppings are very small, as they are.

June 2013, Hicksville

14. I understand that the Defendants now allege in their Re-Amended Defence that while in Hicksville, I grabbed someone called Kelly-Sue by the wrist and threatened and hurt her. Further allegations are made in the Confidential Schedule to the Re-Amended Defence. However, I have not seen any witness statement from Amber or anyone else on her behalf in which she gives evidence about this, so it is difficult to respond other than to what I have seen is claimed in that document.
15. I remember that Amber and her friends were high on mushrooms and MDMA. I also had taken a few mushrooms and was drinking alcohol though, as I have a higher tolerance than most to substances having turned to them as such a young age. But my behavior was in no way belligerent.
16. A girl I did not know, who the Defendants say is called Kelly Sue, was running her hands all over Amber's body very sexually. Amber did not object. I spoke with the girl and explained that while I understood she was high, she needed to stop doing that. I recall saying something along the lines of "*If you can't handle the drugs, don't take them.*" I did not hurt or threaten her in any way. I was not enraged. I did not throw glasses at Amber or rip her dress.
17. When back in our cabin, Amber started to harangue me for speaking to the girl. I remember being conscious of how loudly she was screaming at me, as I knew people in the other cabins would hear her. As was my way, I tried to placate her and ask her to stop screaming but this only served to make her angrier. She was calling me all sorts of names and throwing insults at me as was usual.
18. As these insults and name calling went on, at one point out of frustration I hit a wall sconce with my hand. In the morning, I went to the guy who runs the Hicksville site to tell him about the damage. He came over, took the broken one off, replaced it, I apologized, and the man said "not a problem." Amber and I then got in the car and drove back to Los Angeles. That is all.
19. My response to the completely untrue allegations now advanced in the Confidential Schedule to the Re-Amended Defence are contained in the Confidential Schedule to this witness statement.

24 May 2014 – Plane Incident from Boston to LA

20. I have already explained the truth about the allegations at paragraphs 35 – 40 of my second witness statement. I understand that the Defendants have now added an allegation that I also slapped Amber in the face. That never happened. Multiple witnesses have testified to what actually occurred.
21. It is true that rage-filled violent incidents on planes were common with Amber; but she was always, and without exception, the sole aggressor and I was always the one who was on the receiving end. As one illustration, 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, calling me a "pussy" and "spineless" for "running away" from fights with her. Then she became physically violent and repeatedly punched me in the face. As I moved towards the back of the plane to get away from her, she followed me into the plane's bedroom and punched me again in the face and the head. I pushed her away from me, onto the bed. I then grabbed a pillow and locked myself in the bathroom, where I slept for the duration of the flight.

August 2017 – Bahamas

22. I understand that the Defendants have amended their position on the purpose of this trip. It is correct that I was not drinking at that point. The trip was to "kick" – to reduce my very advanced dependency on - prescription painkillers, which I had begun taking years earlier after a film stunt injury. I repeat paragraphs 41 – 46 of my second witness statement in which I have already dealt with the remainder of the multiple false allegations Amber has made about this trip.

March 2015, Australia

23. The Defendants bizarrely claim that this alleged incident took place over three days between March 3 – 5. Even the small details of these demonstrably false allegations are internally inconsistent and wildly diverge from the reality that is shown by hospital intake records and multiple eyewitness statements. Amber severed my finger with the second of two thrown vodka bottles at me in the early afternoon of Sunday March 8. Amber claims this was on the second day of a "*three-day hostage situation*." I went to the hospital as records show later that afternoon, and I did not see her again on this trip. She was taken early the next morning by Ben King back to LA.

24. Amber claims that during these three days, I subjected her to a variety of what sounds like torture and other abuse. These sick claims are completely untrue. 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. I believe that she and I were watching television together happily while we ate dinner, which we often did. I understand that the Defendants have changed the argument which is alleged to have happened about MDMA pills to the first day of this “three-day hostage situation”, which I assume would be the Friday March 6 under Amber’s new version of events. I have already set out what actually happened in paragraph 54 of my second witness statement, and this remains the case whether this allegation is now made about Friday March 6 or any other day in March.
25. I do not recall anything out of the ordinary occurring on Saturday March 7, 2015 (which I presume is meant to be ‘the second day’). I had been sober for quite a long time at that point. As I have previously explained, 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 after I unsuccessfully sought refuge and peace from her in one locked bathroom after another. I understand that Amber makes references to a bottle of Jack Daniels in her first witness statement. There was no Jack Daniels on the property. I know that because if there had been, I would have definitely drunk Jack Daniels rather than vodka when I finally broke down and sought the solace of alcohol for the first time in a very long time.
26. I understand that the Defendants now claim that the lengthy argument which took place during the day on Sunday March 8 happened instead on the evening of March 4. Even if the Defendants mean Saturday March 7, they now make further false allegations of violence against me, for example that I shoved Amber up against a fridge by her hair and slapped her in the face. None of those allegations are true. I have already responded to the absurd suggestion that I severed my own finger by smashing a plastic telephone against a wall. The Defendants now claim that it was only the following morning that Amber realised that I had sustained a serious injury to my finger, and that she believed it to have happened by smashing the telephone.
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. As we left, Amber was screaming “I love you” and “don’t leave me.” I told my security team to “get her out of here.” Malcolm first drove me to his nearby apartment, where I recall we remained for over

an hour. Once it became clear that the injury was too severe to be handled by first aid-trained security guards, we then drove to the hospital and there are records of our arrival that afternoon. Amber and the Defendants are absurdly suggesting that I could have severed my own finger, assaulted Amber during the night of March 8 in some of the most disgusting, violent and horrific ways imaginable, and then gone to sleep until the morning. That is unthinkable, and the evidence shows it simply did not happen. I could not have had the treatment that received on my finger in hospital if I had waited until the next morning to go to the hospital for treatment. The hospital discharge letter, which has already been disclosed, records my entry to the Emergency Department at 16.20 on March 8.

28. As I have previously explained, my finger was cut off by Amber throwing a large “handle” vodka bottle at me. I called my security guards shortly after this, and they immediately came in. After going to Malcolm’s, I was taken straight to the hospital. 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. At no point did she seek help from them while she claims she was undergoing a three-day hostage ordeal. Nor did Ben King, our property manager who escorted her back LA early Monday morning March 9, see any damage to her face where she claimed I had been savagely striking her. Rather, she confessed her own rage and violence to him using the precise same words that she used confessing the same to me on the recorded audiotape. The truth is that she did not sustain any injuries at all during the weekend of March 8, while I suffered grievous injuries including a severed finger and a cigarette stubbed out on my cheek.
29. As to the other ‘details’ which Amber has now added, I did not urinate throughout the house, I did not paint Amber’s clothes, nor did I hide raw meat around the house. I repeat what I have already said in my second witness statement about to the remainder of the allegations that. These newly added allegations of violence or abuse are untrue.
30. At paragraph 113 of her witness statement, Amber refers to more false allegations in the confidential schedule annexed to her statement. I have responded to those new allegations in the confidential schedule to this witness statement.

March 2015 – Los Angeles

31. I understand that Amber now claims that I hit her after she confronted me for allegedly cheating on her. In fact, I broached the subject of me speaking with a previous girlfriend as I wanted to

explain to this girl why things between us had started to change as I started seeing Amber. I felt that this was the right thing to do out of respect for this girl as she was a very nice person and I felt bad about how things had been left between us. I could have just spoken to her without mentioning it to Amber, but I wanted to be open and transparent about it with Amber. Unfortunately, Amber became extremely angry about this and I remember that she was very hostile and abusive for several days.

32. However, I was not violent at all with Amber about this, or at any other time. This new allegation that I grabbed Amber by the hair and hit her repeatedly is completely untrue.

21 April 2016

33. I understand that Amber and the Defendants now allege that at the end of the argument after Amber's birthday party, I left a note which said, "*Happy fucking Birthday*". I do not recall leaving such a note, but it is possible that I did so after the abuse I had suffered that evening / early morning. This was the final straw and I had decided to leave Amber permanently as I could not deal with things anymore despite how in love with her I was, which I definitely was.

The witness statement of iO Tillett Wright

34. iO Tillet Wright also makes a number of allegations about me in his witness statement dated 12 December 2019. I have already dealt with the majority of these in my second witness statement.
35. When I first met iO, we got along very well. I wanted to help iO, who had recently gone through a difficult break up and so I let him stay at one of my houses for free and extended other courtesies and kindnesses to him. However, good relations changed dramatically as a result of iO's behavior towards my young daughter, Lily-Rose Depp.

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36. iO had a project called “We Are You.” As part of that project, she spoke to my daughter, and when my daughter was only 16, without my knowledge or that of her mother Ms Paradis. iO manipulated my daughter into doing a photo shoot for this project, which was connected to promoting LGBT rights. iO then misrepresented what my daughter had said to him in order to portray her publicly as bisexual to use my daughter to promote his project.
37. My daughter was extremely distressed and upset by being used in this way, as was I. I felt that it was a huge betrayal of trust to go behind my back and then seek to publish extremely personal and false information about my 16-year-old daughter’s sexuality. I had been so generous to iO and really sought to help him and in return he caused a very significant amount of distress to my daughter. After this, I had no interest in maintaining a relationship with him. For me, there was no coming back from that behavior.
38. At paragraph 19 of iO’s witness statement, he alleges that he had a conversation with me about the alleged incident on the Boston-LA flight. I do not recall any such conversation.
39. At paragraph 28 of iO’s witness statement, he claims that I made a comment to him at my wedding about punching Amber. This is completely untrue. In fact, there was violence during my wedding; iO beat Amber’s other bridesmaid Rocky Pennington, leading to iO receiving the nickname from Josh Richman during the wedding of “I Slap Rocky,” a name iO thought was hilarious.

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

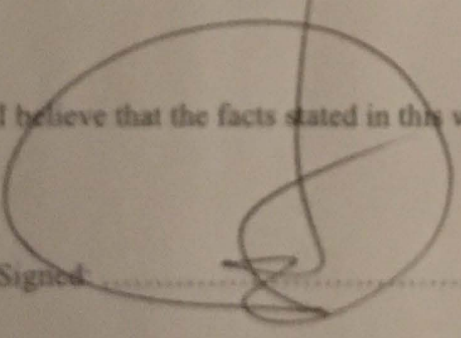
Signed:

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Defendant

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D185.1



D185.2



D185.3



D185.4



D185.5