

Name: Amber Heard
Statement: Second
Party: Defendants

Date: 19 February 2020

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

CLAIM NO QB-2018-006323

BETWEEN:

JOHN CHRISTOPHER DEPP II

Claimant

-and-

(1) NEWS GROUP NEWSPAPERS LTD

(2) DAN WOOTTON

Defendants

Second Witness Statement of Amber Heard

I, Amber Heard of [REDACTED] LA CA 90067 **WILL SAY AS**

FOLLOWS:

1. I am an actor, model and activist. I was married to Mr Depp, the Claimant in this libel action, and I am a witness for the Defendants in this action.
2. In this claim I have approved and signed a witness statement dated 15 December 2019 with certain information set out in a Confidential Schedule to that statement. I understand that my former acting coach Kristina Sexton, who is also a witness for the Defendants in this action, has provided a witness statement dated 4 December 2019 with certain information set out in a Confidential Schedule to that statement. I also understand that the Re-Amended Defence in this claim contains certain information in a Confidential Schedule to that document.

3. I anticipate that similar information will be contained in the Confidential Schedule to my third witness statement in reply to the Claimant's evidence, and that the Claimant may refer to similar information in Confidential Schedules to his reply witness statement or the Re-Amended Reply.

4. I make this witness statement in support of the Defendants' application for an order:
 - a. That no copies of the Confidential Schedules to the Statements of Case or the Confidential Schedules to witness statements ("the Confidential Schedules") be provided to a non-party without further order of the Court;
 - b. That any copy of the Confidential Schedules on the Court file must be kept in a sealed envelope which is not to be opened except by or with the permission of a High Court Judge (and the envelope is to be marked accordingly);
 - c. That at the trial any evidence or discussion relating to the matters contained in the Confidential Schedules be heard in private, and there be no reporting of the same; and
 - d. That the Confidential Schedules to witness statements shall not be open to public inspection during the course of the trial.

5. The trial of this claim is taking place between 23 March – 3 April 2020 and I understand from the Defendants' solicitor, Louis Charalambous, that issues relating to reporting restrictions and open justice at that trial will be considered and determined at a Pre-Trial Review.

6. The facts and matters set out in this statement are within my own knowledge unless otherwise stated, and I believe them to be true. Where I refer to information supplied by others, a source of the information is identified. Facts and matters derived from these other sources are true to the best of my knowledge and belief.

7. The confidential schedule to this witness statement contains the main body of my statement.

STATEMENT OF TRUTH

I believe that the facts set out in this statement are true.

A handwritten signature in black ink, appearing to be 'A. Heard', written over a horizontal dotted line.

Amber Heard

19 February 2020