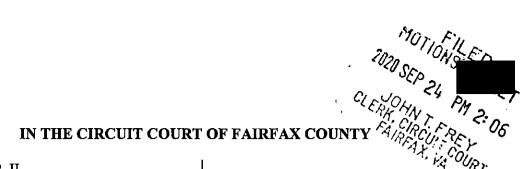
# VIRGINIA:



JOHN C. DEPP, II,

Plaintiff and Counter-defendant,

v.

Civil Action No.: CL-2019-0002911

AMBER LAURA HEARD,

Defendant and Counter-plaintiff.

DEFENDANT AMBER LAURA HEARD'S MEMORANDUM IN SUPPORT OF HER MOTION FOR SANCTIONS AGAINST ADAM WALDMAN, COUNSEL FOR PLAINTIFF

September 24, 2020

Elaine Charlson Bredehoft (VSB #23766) Adam S. Nadelhaft (VSB #91717) David E. Murphy (VSB #90938) CHARLSON BREDEHOFT COHEN & BROWN, P.C. 11260 Roger Bacon Drive, Suite 201 Reston, VA 20190

J. Benjamin Rottenborn (VSB #84796) Joshua R. Treece (VSB #79149) WOODS ROGERS PLC 10 S. Jefferson Street, Suite 1400 P.O. Box 14125 Roanoke, Virginia 24011 (540) 983-7540

Counsel for Defendant Amber Laura Heard

Defendant Amber Heard brings this motion for sanctions against Plaintiff's counsel

Adam Waldman for his repeated abuse of the discovery process, violation of the Court's

Protective Order, and general conduct in this case. Throughout this litigation, Mr. Waldman has acted like anything but an attorney this Court has a right to expect. Defendant now responds to this Court's multiple invitations to address the conduct directly through a motion for sanctions against Mr. Waldman, including the revocation of his *pro hac vice* admission, prohibition from further contact with the press or the public through social media about this case, and for fees and costs for having to bring this motion.

# **ARGUMENT**

# Legal Standard

The Supreme Court of Virginia "has recognized that the courts of this Commonwealth have the inherent power to supervise the conduct of attorneys practicing before them and to discipline any attorney who engages in misconduct." *Nusbaum v. Berlin*, 273 Va. 385, 399 (2007) (citations and quotations omitted). This includes the power "to remove an attorney of record in a case[.]" *Id.* With respect to attorneys admitted *pro hac vice*, the Virginia Supreme Court has held that "Virginia courts have broad discretion in determining whether to revoke an attorney's *pro hac vice* admission. A court may revoke the *pro hac vice* admission of counsel at any stage of court proceedings when it appears that counsel's conduct adversely impacts the administration of justice." *Williams & Connolly, LLP v. PETA*, 273 Va. 498, 522 (2007). "Admission pro hac [vice] is not a right, it's a courtesy and a privilege[.]" *Id.* (quoting Circuit

Mr. Waldman also figures centrally in Defendant's counterclaims, where she alleges Mr. Depp has defamed her through Mr. Waldman's statements as Mr. Depp's agent, and has orchestrated a robust social media campaign against her through the use of inauthentic social media accounts (i.e., not real accounts by real people) casting aspersions on Defendant while often praising Mr. Depp and Mr. Waldman. The conduct for which Defendant now seeks sanctions is related but distinct from the conduct alleged in the counterclaims.

Court decision). Revocation is within the Court's authority and is appropriate when counsel's conduct reflects an "inadequate understanding of Virginia's ethical requirements" or fails to meet "the level of professionalism . . that our [C]hief [J]ustices. . . as well as many others in the [S]tate have worked so hard to instill." *Id.*; see also Myer v. All Dulles Area Muslim Soc'y, 102 Va.

Cir. 77, 78 (Fairfax Cty. 2019) (citing Williams & Connolly) (contemptuous and disparaging language is inherently improper and subject to sanction under the statute.). Mr. Waldman has crossed the line of decorum and conduct expected of counsel in numerous ways.

# II. Mr. Waldman has Violated the Protective Order

On at least two occasions, Mr. Waldman has violated the Court's Protective Order in this case by leaking documents marked "Confidential" to the press. The first was the deposition testimony of Joshua Drew, a third-party witness in this case. On June 10, 2020, Defendant's representatives received an email from a publication referencing Drew's deposition testimony and alleged testimony regarding a rumor (which is untrue) relating to Defendant's relationships.

Exh.1. Because that portion of the deposition transcript had been marked Confidential, counsel for Defendant promptly reached out to Mr. Chew and demanded the leak be retracted. Exh. 2.

Mr. Chew did not respond, though in a later telephone conversation with Defendant's counsel, did not deny that Mr. Waldman had leaked the transcript. It thus came as no surprise when, just a few weeks later, another press organization reported on a text message between Defendant and Elon Musk that had been marked "Confidential" yet leaked to the press and tweeted by Mr.

Waldman, in further violation of the Protective Order. Exh. 3.

It is no rebuttal for Plaintiff to contend that the leaked material should not have been designated as Confidential under the Protective Order. The Protective Order provides a mechanism for a claim of over-designation: the parties are to meet and confer promptly to

resolve disputes and, if necessary, may request the Court remove or modify a confidentiality designation. 9/25/19 Protective Order § II(2). Indeed, Plaintiff's counsel referred to this provision during the Joshua Drew deposition when Defendant's former counsel claimed Mr.

Depp had over-designated portions of the deposition and Mr. Chew replied: "We have the right to designate, and you have the right to challenge." Drew. Dep. at 140:23-25. Mr. Waldman's unilateral decisions leak Confidential material make a mockery of this Court's Order.

III. Mr. Waldman Created Witness Declarations with this Case Header, Leaked them to the Press Falsely Purporting to Have Filed the Declarations in this Court, and Provided Other Discoverable Materials to the Press While Refusing to Produce to Defendant

Throughout this case, Mr. Waldman has leaked discoverable documents to the press without producing them to Defendant, forcing Defendant to move to compel and the Court to Order the leaked material be produced, and despite those documents being responsive to Court-Ordered discovery but not produced. These leaked documents included audio recordings and surveillance pictures, along with at least eight Declarations from third party witnesses that were leaked to websites and twitter users without being produced despite their responsiveness and covered by Orders compelling production. News outlets to which Waldman leaked these documents referred to them as "court documents," leading readers and potential jurors to believe that these Declarations are somehow official case documents, which they are not.

Plaintiff – we believe through Mr. Waldman as well –also leaked numerous discoverable materials through Twitter to launder information that Mr. Waldman apparently believes will help laintiff. For example, on April 6, 2020, a Twitter user posted a video with a title containing

https://www.dailymail.co.uk/news/article-7743993/Amber-Heards-father-threatened-SHOOT-Johnny-Depp-witness-testifies-actors-defamation-suit.html

<sup>&</sup>lt;sup>3</sup> https://theblast.com/c/johnny-depp-amber-heard-vanessa-paradis-ex-wife-declaration-lawsuit-defamation-defends

"NEW EVIDENCE!!" that includes Declarations (with case captions for this matter in Fairfax County) from third parties as well as medical records from Gold Coast University in Australia regarding Mr. Depp's finger injury. <sup>4</sup> Plaintiff leaked these medical records without producing them to Defendant despite the Court's October 18, 2019 Order compelling their production. <sup>5</sup> It wasn't until after Defendant moved to compel on July 10 and the Court re-Ordered Plaintiff to produce these records that he actually did so – 10 months late and after public disclosure.

Mr. Waldman has leaked numerous other documents to Twitter users and gossip websites before producing them to Defendant, including: A personal email and attachment of Ms. Heard's to a Twitter user, who posted it on December 146; text messages from Ms. Heard's parents to Mr. Depp<sup>7</sup>; correspondence between an attorney for a non-party witness who sought confidentiality protections in advance of the witness's deposition<sup>8</sup>; excerpts of audio of a 2015 recording between Mr. Depp and Ms. Heard; and excerpts of a 2016 audio recording between Mr. Depp and Ms. Heard. Mr. Waldman appears more intent on leaking and violating the Protective Order than in complying with his client's discovery obligations, the Court Orders on prior motions to compel, and following the Court's directive not to litigate the case in the press. See,

<sup>&</sup>lt;sup>4</sup> See https://twitter.com/ThatBrianFella/status/1247305967374606337.

<sup>&</sup>lt;sup>5</sup> See https://twitter.com/ThatBrianFella/status/1256293243576352770.

<sup>6 @</sup>thatbrianfella, Twitter (Dec. 14, 2019),

https://twitter.com/ThatBrianFella/status/1206065361034055680.

<sup>&</sup>lt;sup>7</sup> See <a href="https://theblast.com/c/johnny-depp-amber-heard-domestic-violence-text-messages-parents-statement">https://theblast.com/c/johnny-depp-amber-heard-domestic-violence-text-messages-parents-statement</a>.

<sup>&</sup>lt;sup>8</sup> See <u>https://theblast.com/c/johnny-depp-amber-heard-james-franco-private-sealed-deposition-video-elevator.</u>

<sup>&</sup>lt;sup>9</sup> See <a href="https://www.dailymail.co.uk/news/article-7947733/Amber-Heard-admits-hitting-ex-husband-Johnny-Depp-pelting-pots-pans-tape.html">https://www.dailymail.co.uk/news/article-7947733/Amber-Heard-admits-hitting-ex-husband-Johnny-Depp-pelting-pots-pans-tape.html</a>.

<sup>&</sup>lt;sup>10</sup> See <a href="https://www.dailymail.co.uk/news/article-7966723/Amber-Heard-ridicules-Johnny-Depp-claiming-hes-domestic-violence-victim.html">https://www.dailymail.co.uk/news/article-7966723/Amber-Heard-ridicules-Johnny-Depp-claiming-hes-domestic-violence-victim.html</a>.

e.g., Dec. 13, 2019 Hr'g Tr. 6:20-22 (Court: "[W]e don't need to make statements and arguments that are later on going to be used in the press. So we're going to just stop doing that.").

Mr. Waldman's continuing efforts to manipulate the press and disregard discovery obligations are wholly improper and fundamentally at odds with Ms. Heard's rights to a fair trial and full and fair discovery. See, e.g., Am. Sci. & Eng'g, Inc. v. Autoclear, LLC, 606 F. Supp. 2d 617, 625–26 (E.D. Va. 2008) (awarding sanctions for a misleading press release and recognizing "[t]he Supreme Court has held that civil litigants have a constitutional right to an impartial jury and [c]ourts may disallow prejudicial extrajudicial statements by litigants that risk tainting or biasing the jury pool.") (internal citations omitted). They also impede the willingness of third parties to participate in this case for fear of leaks or harassment by Mr. Waldman. See supra n. 8. Indeed, after Mr. Waldman leaked his deposition testimony, Joshua Drew initially stated that he would not testify in the UK trial. The Court should put a stop to this conduct.

# IV. Mr. Waldman's Tweets and Press Statements Show No Regard for Judicial Process

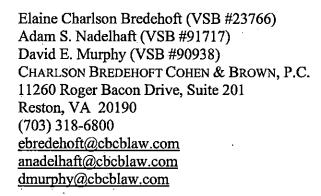
Mr. Waldman is a prolific tweeter and publicity hound whose tweets and press releases about this case generally fall into three categories: (1) statements that refer to leaked documents that have not been produced (Exh. 4); (2) statements that show utter disrespect for the judicial process and the Court's admonitions not to litigate this case in the press (Exh. 5); and (3) ad hominem attacks on Ms. Heard or her counsel (Exhs. 6 and 7). The Court need only take a cursory glance at the representative samples Defendant has attached to conclude that Mr. Waldman fails to meet "the level of professionalism . . . that our [C]hief [J]ustices. . . as well as many others in the [S]tate have worked so hard to instill." 273 Va. at 522.

# **CONCLUSION**

For the reasons above, Defendant respectfully requests that the Court grant the Motion.

# Respectfully submitted,

Amber L. Heard



J. Benjamin Rottenborn (VSB #84796)
Joshua R. Treece (VSB #79149)
WOODS ROGERS PLC
10 S. Jefferson Street, Suite 1400
P.O. Box 14125
Roanoke, Virginia 24011
(540) 983-7540
brottenborn@woodsrogers.com
itreece@woodsrogers.com

Counsel to Defendant Amber Laura Heard

# **CERTIFICATE OF SERVICE**

I certify that on this 24<sup>th</sup> day of September 2020, a copy of the foregoing was served by email, by agreement of the parties and Court Order, addressed as follows:

Benjamin G. Chew, Esq.
Andrew C. Crawford, Esq.
BROWN RUDNICK LLP
601 Thirteenth Street, N.W.
Washington, D.C. 20005
Telephone: (202) 536-1700
Facsimile: (202) 536-1701
bchew@brownrudnick.com
acrawford@brownrudnick.com

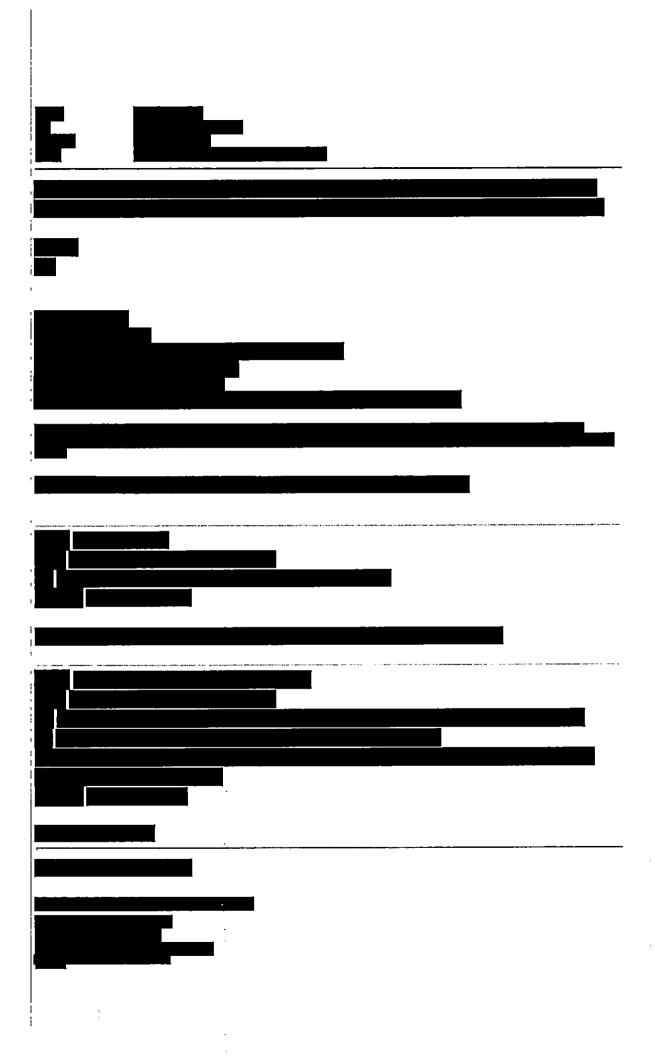
Camille M. Vasquez, Esq. BROWN RUDNICK LLP 2211 Michelson Drive Irvine, CA 92612

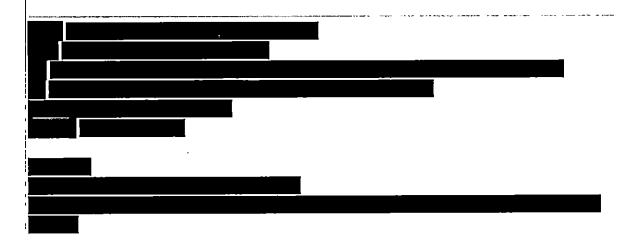
Telephone: (949) 752-7100 Facsimile: (949) 252-1514 cvasquez@brownrudnick.com Adam R. Waldman, Esq.
THE ENDEAVOR LAW FIRM, P.C.
1775 Pennsylvania Avenue, N.W., Suite 350
Washington, DC 20006
awaldman@theendeavorgroup.com

Counsel for Plaintiff John C. Depp, II

J. Benjamin Rottenborn

# Exhibit 1





From: Ben Ashford < Ben. Ashford@mailonline.com >

**Date:** Wednesday, June 10, 2020 at 1:31 PM **To:** Colin Reed < colin@MOLLYLEVINSON.COM > **Cc:** Ben Ashford < Ben.Ashford@mailonline.com >

**Subject:** Heard inquiry

Hi Colin,

Hope you are a well, quite a bit has happened in the world since we last spoke, and much of it is a hell of a lot more important than Johnny Depp and Amber Heard!

· Nonetheless, I have something to run past you (mercifully it's fairly simple).

Josh Drew - who is the ex-husband of Raquel Pennington, Heard's friend and one-time neighbor – says in a deposition that Heard had 'a threeway affair' with Cara Delevingne, the famous model, and Elon Musk.

He says the trio spent the night together on one occasion though he is not specific as to dates or whether it was before or after her split from Depp.

Obviously Depp has accused Heard and Musk of starting their relationship before May 2016, but we are not specifically alleging the 'three way' started before then .

He also mentions that Heard is paying for his attorney, which I mention because he's hostile to Depp, not on his side.

If you need any further details, just give me a shout.

Cheers

Ben

646 276 1017

## **Disclaimer**

This e-mail and any attached files are intended for the named addressee only. It contains information, which may be confidential and legally privileged and also protected by copyright. Unless you are the named addressee (or authorised to receive for the addressee) you may not copy or use it, or disclose it to anyone else. If you received it in error please notify the sender immediately and then delete it from your system. Associated Newspapers Ltd. Registered Office: Northcliffe House, 2 Derry St, Kensington, London, W8 5TT. Registered No 84121 England.

This email and its attachments may contain information that is confidential and/or protected from disclosure by the attorneyclient, work product or other applicable legal privilege. If you are not the intended recipient of the email, please be aware that any unauthorized review, use, disclosure, dissemination, distribution, or copying of this communication, or any of its contents, is strictly prohibited. If you have received this communication in error, please notify the sender immediately and destroy all copies of the message from your computer system. Thank you.

# Exhibit 2

From: To: Subject: Rottenborn, Ben "Chew, Benjamin G." Josh Drew Deposition

Ben,

If hope you are doing well. We received a press inquiry yesterday from someone referencing a portion of the Josh Drew deposition. As you know, the entire deposition currently is stamped confidential on the face of the transcript. I am assuming his counsel did not leak it, but I have reached out to her as well. If anyone from your side leaked it, we demand that you immediately retract the leak. We reserve all rights.

Thanks,

# Exhibit 3

From: halina watts < halina watts@reachplc.com Sent: Tuesday, June 23, 2020 9:53 AM	and the state of
To: Jodi Gottlieb < iodi@independentpr.com >; jk	covacevic asst@wmeentertainment.com
Subject: Amber Heard	
Dear Jodi and Jessica,	
•	
I hope you are well.	•
Thope you are well.	
ŀ	
The Mirror has been made aware of some messa	ages between Elon Musk and Amber Heard which were
supplied to Johnny Depp's lawyers and used in t	
•	
; ·	
In the messages, Amber calls Elon Musk by the n	nickname "Rocketman".
	<del>"</del>
In the messages sent on May 22 2016 Amber wr silence".	rites about how she has been subjecting Musk to "radio
1	•
Musk also offers "to engage 24/7 security" for he past".	er because she had "talked about J being violent in the
When she writes that she is filing for divorce, and right? Is there anything I can do?"	d a restraining order, Musk replies: "Wtf? But you're ol
Musk also writes: "Sorry for being an idiot. The r like you."	radio silence hurt a lot. It only matters because I really
1	3

Many thanks,		•	-		
Halina Watts					
Showbiz Editor					
i Sunday Mirror				•	•
				-	
'			-		
			·. <u>-</u>	4	
IMPORTANT NOTICE This email (including an also contain confidential and privileged inform disclosure, distribution or copying of this email immediately by email if you have received this have views or opinions in this email are solely to Reach plc or its associated group companies	ation. If you or attaching message hose of the	u are not th ments is stri by mistake e author an	e intended red ctly prohibited and delete the d do not neces	ipient, any relía . Please notify to e email and all a ssarily represent	nce on, use, he sender ttachments. t those of

information provided, unless that information is subsequently confirmed in writing. Although every reasonable effort is made to keep its network free from viruses, Reach Group accept no liability for any virus transmitted by this email or any attachments and the recipient should use up-to-date virus checking software. Email to or from

this address may be subject to interception or monitoring for operational reasons or for lawful business

practices.

# Amber Heard called Elon Musk her 'Rocketman' in texts while I

Actress Amber Heard allegedly used the nickname for Elon when they exchanged text messages



Amber Heard pictured with Elon Musk

Amber Heard called billionaire Elon Musk her "Rocketman" while she was married to Johnny Depp.

The actress used the nickname in texts passed to Depp's legal team as part of a defamation case ag

Table chief Musk last week denied he was involved in an alleged "three-way affair" with his ex Heard Privacy

he strenuously denies.



Amber Heard and Elon Musk (Image: Instagram)

Heard saved Musk's number on her phone as Rocketman, a reference to his SpaceX rocket program In the messages, Musk also offers "to engage 24/7 security" because she had "talked about J being  $\nu$  The actress replies that she is filing for divorce and a restraining order.



☐ Cara Delevingne and Amber Heard (Image: Getty)

# Enter your email

Get started

When you subscribe we will use the information you provide to send you these news-etters. Someomes they'll include recome endations for other related newsletters or services we offer. Our Privacy Notice explains more about how we use your dust, and your rights. You can unsubscribe at any time.

The claim heard, Musk and Delevingne were in a secret relationship in 2016 surfaced in legal depos Musk responded: "Cara and I are friends, but we've never been intimate. Amber and I only started g divorce filing!"

Privacy d to have hurled a phone at Heard on May 21, 2016.



Amber Heard filed for divorce from Johnny Depp in 2016 (Image: Getty)

He sued after Heard portrayed herself as a domestic abuse survivor in a newspaper article.

Their High Court battle begins on July 7. Heard declined to comment.

ADVERTISEMENT

76659595577

Depp's lawyer Adam Waldman said: "Last week, Elon Musk publicly claimed his relationship with An 2016, a date that was conveniently later than the May execution of Ms. Heard abuse hoax in which: phone into her face and further beat her.

"These messages between Ms Heard and Mr Musk profoundly contradict Musk's statement that he during their marriage."

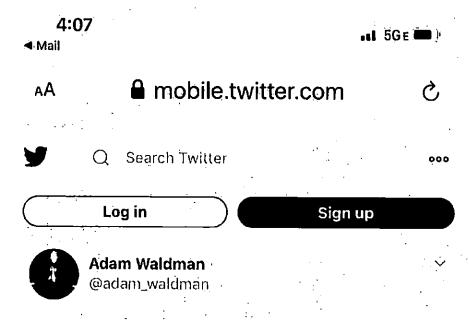
Do you have a story to sell? Get in touch with us at webcelebs@trinitymirror.com or call us direct 02

Like 802K

Follow & mirrorceleb

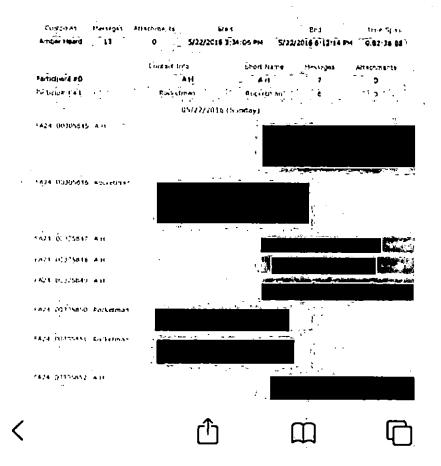
BROMOTED STORIES

Privacy



Rocketman May 22, 2016. Hoax + 1 day.

X H37. Text messages between Amber Hea...



• 1 5GE - 1

■ Mail

# 







5:31 PM - Jun 24, 2020 - Twitter for iPhone

188 Retweets 51 Quote Tweets 772 Likes

<u></u>

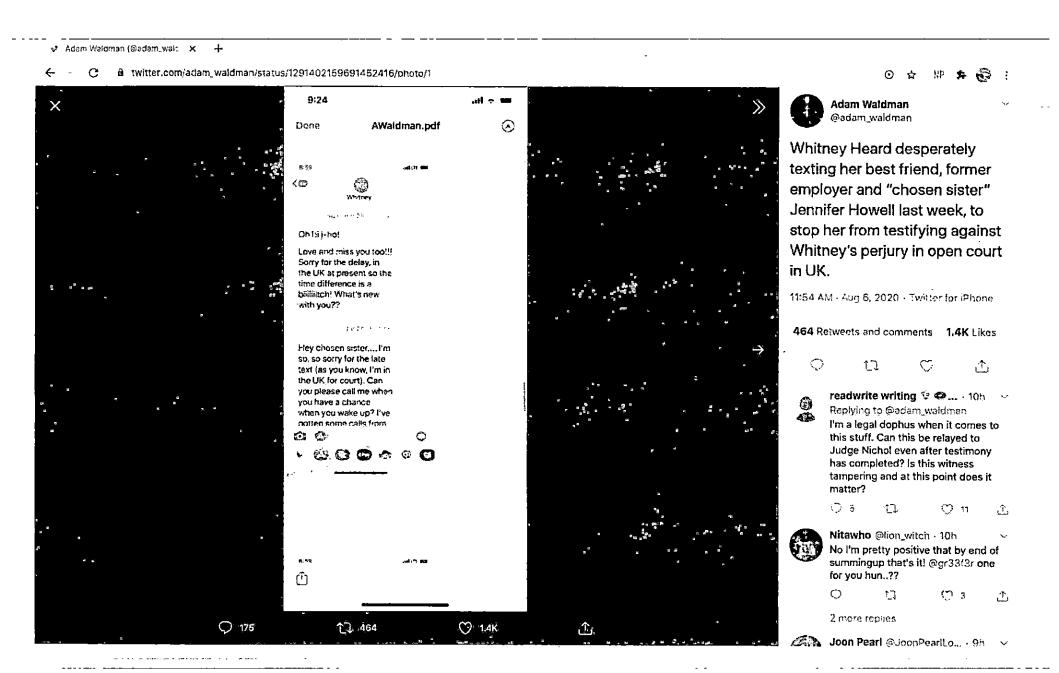


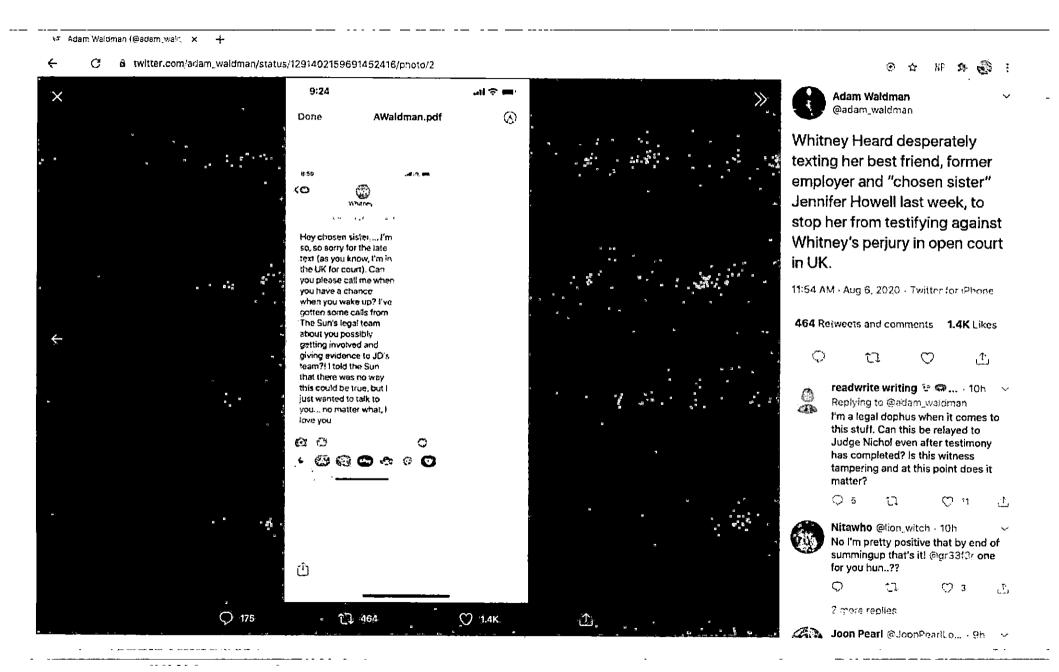


# Exhibit 4

# Adam Waldman Statements/Tweets Leaking Case Materials

Visites Deie





Adam Waldman @adam\_waldman

Jennifer Howell responds that she cares about Whitney Heard, her "chosen sister." But clearly not more than she cares about the truth. Which Ms Howell told, testifying against Whitney Heard's perjury.

12:06 PM - Aug 6, 2020 - Twitter for iPhone

254 Retweets and comments 1K Likes

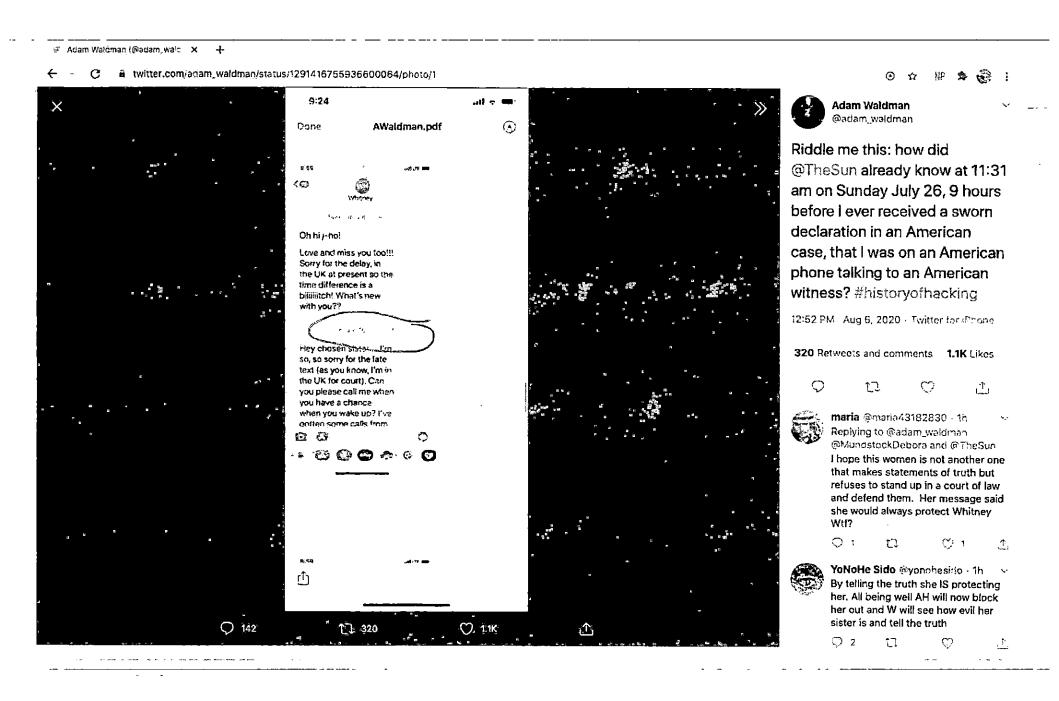
Larsa @AbsolutePoison9 + 10h Replying to @adam\_waldman
I'm torn on the Whitney thing. On 1 hand yeah, she needs to grow a pair & tell the truth. On the other, we don't fault victims for not leaving abusive relationships sooner & I very much feel that Amber is abusive to her sister. She might even have some financial control over her

Q 2 💢

♡ 6

Victoria @71northmoore · 3h

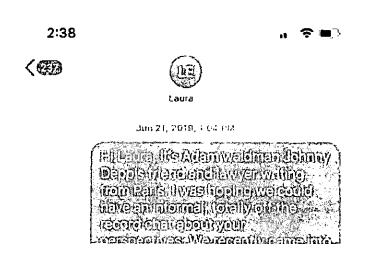
Whitney is not a victim. She lived off
Johnny Depp in a penthouse. This is
no way to repay him. She got herself
into this mess, Maybe she was
bribed. I sure hope it's worth going to
jail. Some mother. They could take



# **Tweet**



Later, @TheSun lawyers presented to the Court, and got @eriqgardner @THR to carry their water and publish the lie that I pressured Ms Divenere in a (actually rather polite) text on June 22. In fact, THIS was my first communication to Ms Divenere June 21



Tweet your reply













Laura

Jun 21, 2019, 1 94 PM

Hill John, Markel John Welding in the home Page of the home Page of the water of the home Page of the water of the home in the water of the home in the home will be a present of the home in the home. The home in the home in the home i

Jun 21, 2019 3:22 PM

Hi Adam, I'm in the middle of an install these next few days, so my schedule's a little more than terrible at the moment. Am working through the weekend but should be finished end of day Monday, so could talk Tuesday if you like. That said? Most likely I'm not going to be very useful in any way. There wasn't any work going on in the penthouses at that time, and I only saw Amber several weeks later.





141. 15 16 1





ତ Home

# Explore

Messages

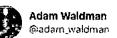
Bookmarks

Lists

O Profile



## Tweet



July 25, 2020 Letter from Jennifer Howell to her "chosen sister" Whitney Heard, explaining why she gave a sworn declaration against her.

July 25, 2020 12:38 pm PSI

Dear Whitney,

This is one of the most important letters that I have ever written in my life. I asked to write a letter to you in my own words after receiving two subpoenas yesterday to give testimony of my knowledge of what happened to lead you to stay with me after leaving the Eastern Colombia.

Building and the Penthouses of Amber and Johnny. The reason this letter is so important to me is that you, my chosen sister, are so important to me and I am hoping that the truth will set you free from a lifetime of abuse and being forced to live someone else's life instead of given the freedom to live your own.

I feel that I am writing this on behalf of everyone who loves you and wants to help save you from, yet again, fighting a battle that is not yours to fight. Outside of google alerts for the tharity and what is the media circus going on right now. I have been unaware of the ins and outs of what is happening between Amber and Johnny. It was brought to my attention that you made reference to Amber, kicking you out of the Penthouses and went to live "on your boss" floor "I don't think it took them too long to connect the dots and figure out who your boss at that time. I have been trying to catch myself up to speed on everything and am afraid that there are different storylines between what I shared and what you shared

I stocke with Adam Waldman this morning and was asked some questions and answered

O Search Twitter

# Relevant people





# What's happening

Weather - CTT

Hurricane Laura upgraded to 'extremely dangerous' Category 4 storm



Trending with: #HurricaneLaura and Louisiana

## #EqualityCantWait

Let's work to expand power & influence for all women in the U.S.

D Promoted by Equality Can't Wart

B Los Angeles Ti... ♣ 2 hours age
 Britney Spears' sister makes
 move to control pop star's
 assets



₩ etalk (3 - 2 hours ago

Gabrielle Union, Keke Palmer stand up against hair discrimination



Tranding in United States

30.6K Tweets

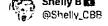
.

No NBA











\_\_\_\_

a twitter.com/adam\_waldman/status/1298660047925452800



(i) Home

# Explore

Messages

Bookmarks

🗐 Lists

Reprofile 2

More



## Tweet

I feel that I am writing this on behalf of everyone who loves you and wants to nelp save you from, yet again, fighting a battle that is not yours to fight. Outside of gougle alerts for the chanty and what is the media circus going on right now, I have been unaware of the ins and outs of what is trappening between Amber and Johnny. It was brought to my attention that you made reference to Amber, kicking you out of the Penthouses and went to live Ton your boss' floor. It don't think it took them too long to connect the dots and figure out who your boss was at that time. I have been trying to catch myself up to speed on everything and am afraid that there are different storylines between what I shared and what you shared.

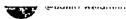
I spoke with Adam Waldman this morning and was asked some questions and answered honestly with my account of the situations. Just so you know, Adam was respectful, kind and understood my allegiance in all of this is to you and you alone. I have never been more upset during any of this drama than I am right now at the thought of Amber asking you to leave and to go to London and entangle you in all of this. If you feel that you have been asked or compromised in any way to do anything that might perjure yourself, I beg you to recant and, for once in your life, think of yourself lirst. You have found an incredible man and have this beautiful and amazing child, and if anyone would ever put you in a position to risk that, they do not love you.

I have shared the names of the other staff at The Art of Elysium who were on board while you were there and heard your accounts of these situations, I am not sure if they will be subpoenaed, but their names have been submitted to the record. I hope you know that the little family created during your time at The Art of Elysium all love you very, very, very much

It crushes my soul, knowing that you may hate me for the rest of your life and never speak to me again. Losing your friendship is something that I am willing to risk if it frees you, and and from all of this and allow you to build your family and your life for you and you alone. You have been my every prayer, every thought, and every consideration.

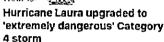
I stated while being questioned that I do not have dates nor timeline because when you showed up to stay with me, I never thought twice about giving you a home and was happy to provide you with my guest room and have you in the safety of my place. I never wrote down when you moved in nor when you left because my home was and will always be your home. I have entered to record that I am happy to share any text messages, e-mails, or anything that they need from that time to help appropriately piece together specific dates and an accurate timeline. I have offered anything that I have to help shed light on the absolute Iruth and put as end to all of this to move on with this next chapter of your life. I promise you that the next chapter will be your best yet.

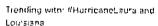




# What's happening

Weather DOR





### #EqualityCantWait

Let's work to expand power & influence for all women in the U.S.

M Fromoteo by Equality Can't Wait

**⑤** Los Angeles Ti... ♥ 2 hours ago Britney Spears' sister makes move to control pop star's assets



🛥 etalk 🗗 - 2 hours ago

Gabrielle Union, Keke Palmer stand up against hair discrimination



Trending in United States

No NBA

30.6K Tweets

Show more

Terms Privacy policy Cookies Adsinfo More -

Messages







The things that came up during the deposition with Adam are as follows:

-- the incident on the stairs that was one of the inciting events that lead you to ask to move in with me. You told me and others on staff that you tried to stop Amber from attacking Johnny and nearly got thrown down the stairs. At no point in time was it ever said to me that Johans had hit Amber nor abused her in any way. Had you ever expressed concern that Johnny was abusing Amber. I would have gotten a social worker or someone to help you to remove your sister from that situation, I would have done anything to help you in any way. My

Eather reminded me this morning that I fold him that "Whitney had moved in with me because she was terrified of her sister,"

--while you were living with me, you told me Johnny kept checking in to see how you were doing and that he called you "sis" and you called him "brother." You said to me on multiple occasions that you did not know why he was staying in it nor why he was putting up with Amber's abuse. You shared with me the damage endured by both of you as children and the injury you had suffered from Amber both psychologically and physically. You were devastated during this time, and my heart broke for you. My heart still breaks for you right now

-- when you came back from New York It believe it was for Tribeca Film Festival, THE ADDERAGE DIARIES premiere or both) you shared with me and everyone in the office that Amber freaked out, attacked you and threw a wine glass full of red wine at you in the elevator. Again, my dates are uncertain, but I am 100% certain of what you shared and have asked a few others who heard it in the office to make sure my facts are accurate.

--while Amber and Johnny were in Australia, you were 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 out off his fucking finger". I am not sure if this was before or after Boo and Pistol were back in the US and coming into the office. Other staff was in the office at that time and might have a better grasp of the date

-in regards to the extramantal affairs, I only have information you and others shared with me. It is my understanding all of that is completely irrelevant other than James giving a sworn testimony to what he did or did not see on Amber's face that day in the ejevator. I told Adam

Search Twitter

# Relevant people





# What's happening

Weather .

Hurricane Laura upgraded to 'extremely dangerous' Category 4 storm



Trending with: #HurricaneLaura and Louisiana

#### #EqualityCantWait

Let's work to expand power & influence for all women in the U.S.

Promoted by Equality Can't Wait

🕲 Los Angeles Ti... 🗘 2 heurs and Britney Spears' sister makes move to control pop star's assets



etalk 🗗 - 2 hours age Gabrielle Union, Keke Palmer stand up against hair discrimination



Trending in United States No NBA

30 ck (weets

Messages





Lists

Profile

More







Explore

Notifications

Messages

Bookmarks

Lists

Profile

More



# Tweet

cut off his fucking finger". I am not sure if this was helore or after floo and Pistol were back in the US and coming into the office. Other staff was in the office at that time and might have a better grasp of the date

-in regards to the extramarital afforms, I only have information you and others shared with me. It is my understanding all of that is completely irrelevant other than James giving a sworn testimony to what he did or did not see on Amber's face that day in the elevator. I told Adam that if James were asked anything at all that I know without a shadow of a doubt that he would speak to the truth because I know his heart and his conscious and the spiritual journey that he is on to be accountable for anything he has ever done that might have inadvertently hurs anyone and to go to great lengths to make amends and do what is right truly. Lencouraged him to speak to James directly.

--when Elon came up in the deposition, I shared only what I know from you and Paige. February 9, 2019 when I came to see you and meet us when this conversation with you and your Mom took place. I told them I had been told that Flon had gifted Teslas, but Amber found our that they were bugged. I was told that Amber said he 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. That is the day that your Mother told me that Johnny was either an "angel" or a "saint" compared to Elon, and she wished that Amber and Johnny would reconcile. I was indeed taken aback because this was after the divorce and when was under a year old, and I was at your house. She told me that Amber and Johnny were still in touch and that they were each other's true loves or something to that exact sentiment. You were still going through the emotions of having had a baby and all of those ups and downs, and I could not believe that Amber and Johnny's relationship was being discussed while you were the one who needed to be the focal point and needed our support. I think I called Tash when I left your house but need to look at my phone records to be sure whom I call, and I records to be sure whom I call, and I

12:45 PM - Aug 26, 2020 - Twitter for Phone

G Search Twitter

# What's happening

Weather .



Hurricane Laura upgraded to 'extremely dangerous' Category 4 storm



Trending with: #Hetricans\_aura and Louisiana

### #EqualityCantWait

Let's work to expand power & influence for all women in the U.S.

Promoted by Equality Can't Wait

🕲 Los Angeles Ti... 🤃 - 2 hours ago **Britney Spears' sister makes** move to control pop star's assets



🗢 etalk 🕼 - 2 hours ago

Gabrielle Union, Keke Palmer stand up against hair discrimination



Trending in United States

#### No NBA

30.6K Tweets

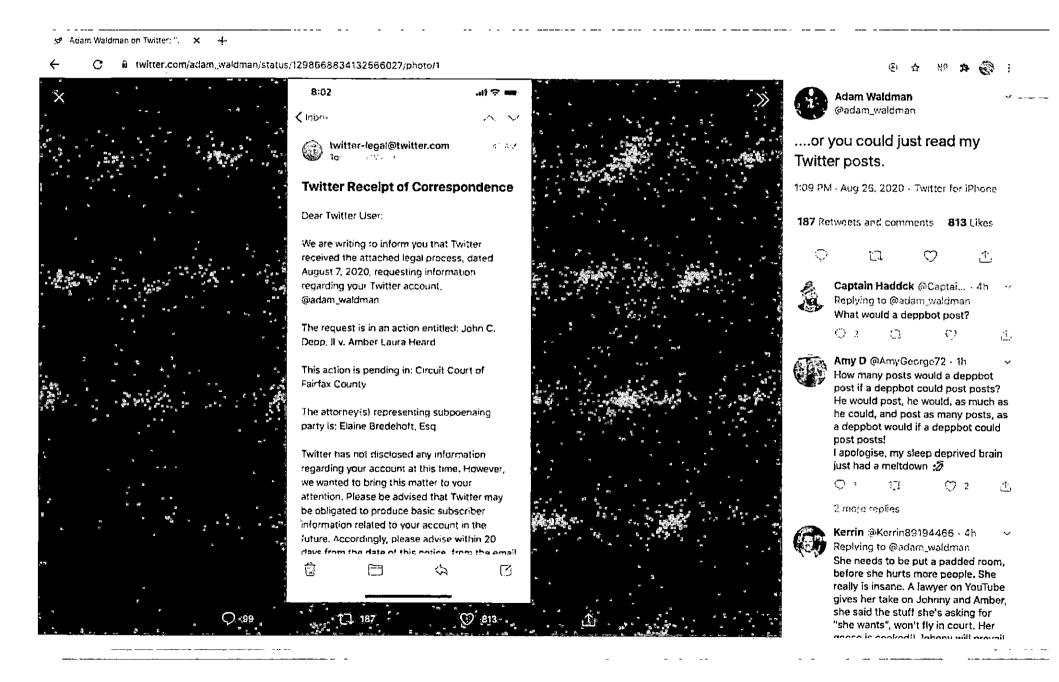
Show more

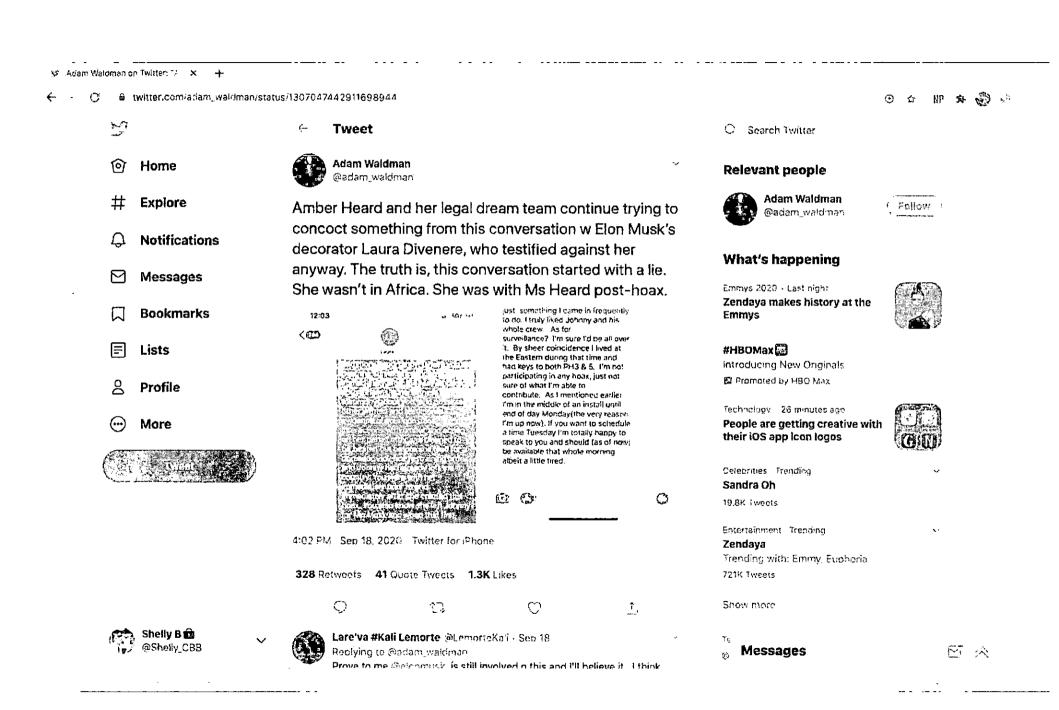


Terms Privacy policy Cookies Adsinfo M. 10 2020 Twitter, Inc.

Messages







Adam Waldman @adam\_waldman

Amber Heard and her legal dream team continue trying to concoct something from this conversation w Elon Musk's decorator Laura Divenere, who testified against her anyway. The truth is, this conversation started with a lie. She wasn't in Africa. She was with Ms Heard post-hoax.

4:02 PM - Seo 18, 2020 - Twitter for iPhone

328 Retweets 41 Quote Tweets

1.3K Likes









Lare'va #Kali Lemorte Sep 18 Replying to @adam\_waldman Prove to me @elonmusk is still involved n this and I'll believe it., I think otherwise for Good reason.









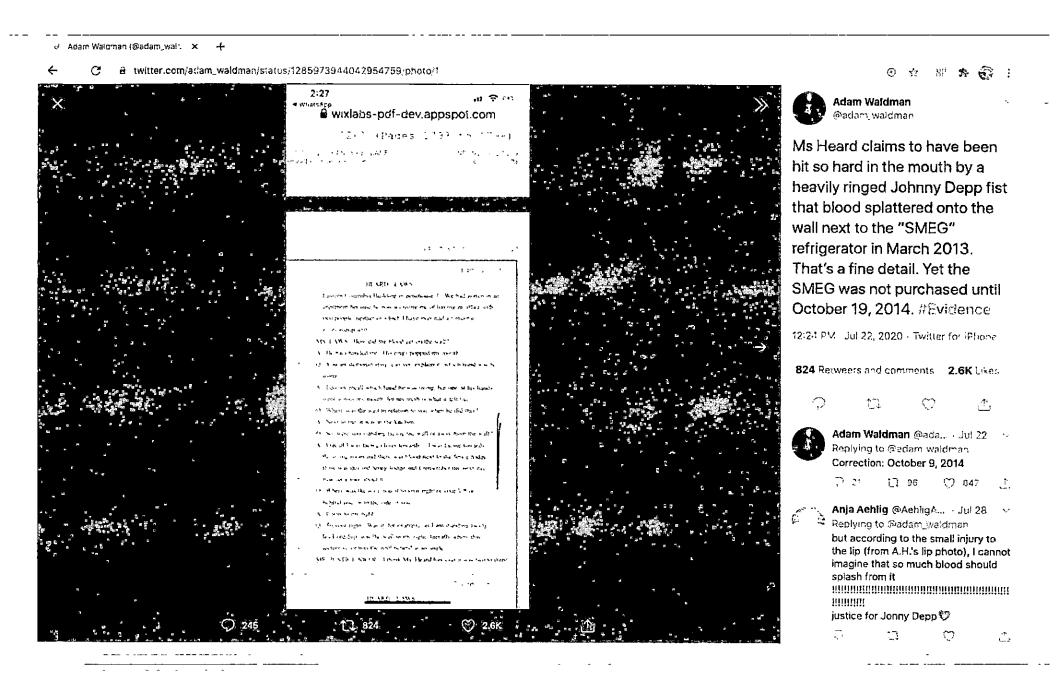


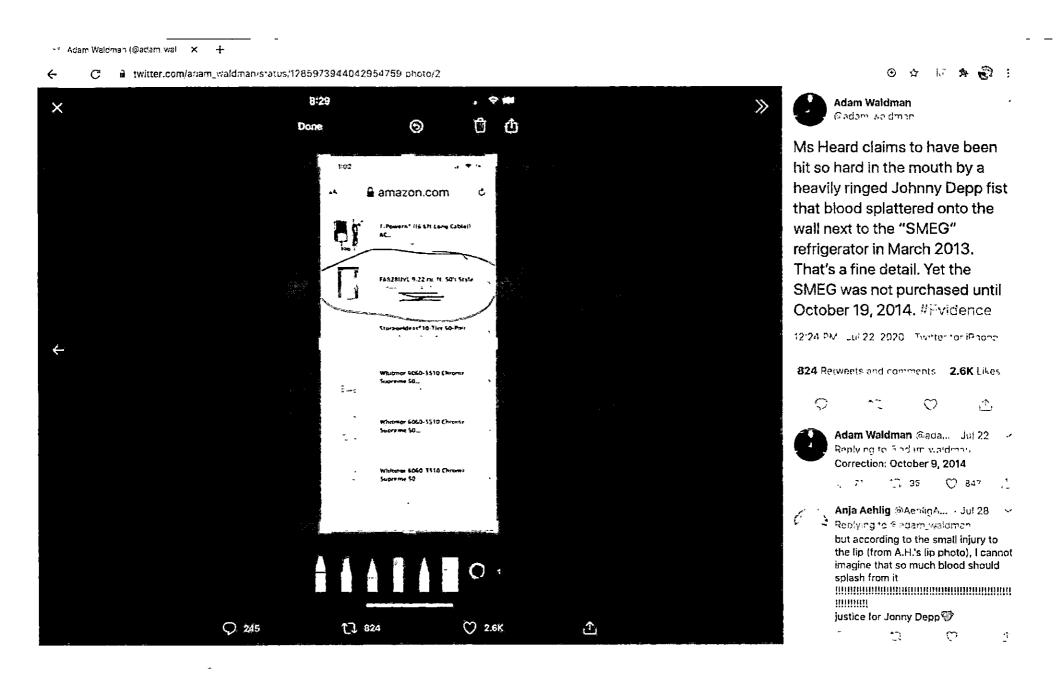


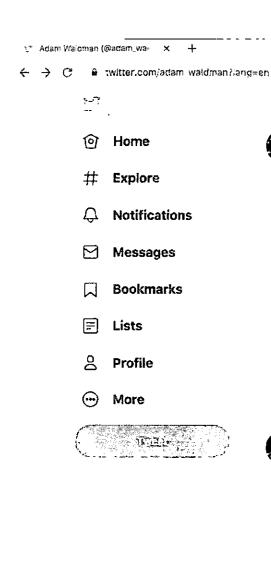


# Exhibit 5

# Adam Waldman Statements/Tweets Disrespectful of Judicial Process









Shelly B @Shelly\_CBB

#### Adam Waldman

263 Tweets

Follow

#### What's happening

O Search Twitter

News - Last night

Show more

Bride 'happy to be alive' after wedding video captures Beirut blast



医血压 医角部:

#StarTrekLowerDecks

New series now streaming, only on CBS All Access

El Promoted by CBS All Access

👫 Financial Times 🖒 - This morning Here's everything you need to know about the Beirut explosion



Movies and TV - Trending Chipotle

5.155 Tweets

(E. CNBC Politics (2) - Earlier today Where do stimulus talks stand?



Show more

Terms Privacy policy Cookies Adsinfo More v @ 2020 Twitter, Inc.

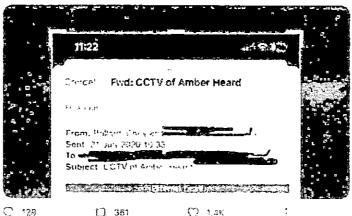


# wixiabs-pot-dev.appspot.com

amazon.com

Adam Waldman @adam waldman - Jul 23

"Would it be possible to get the CCTV clips of Amber Heard without any injuries" asks the @TheSun reporter who sits in court every day, seeming to forget that his bosses @TheSun are the defendants and the evidence must never be reported.

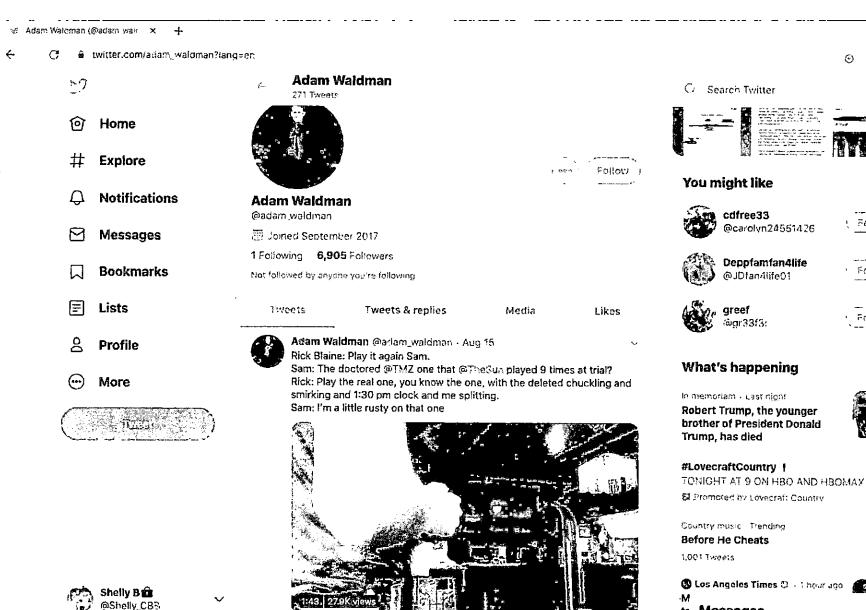


Adam Waldman @adam\_waldman + Jul 22

Ms Heard claims to have been hit so hard in the mouth by a heavily ringed Johnny Depp fist that blood splattered onto the wall next to the "SMEG" refrigerator in March 2013. That's a fine detail. Yet the SMEG was not purchased until October 19, 2014, #Evidence

















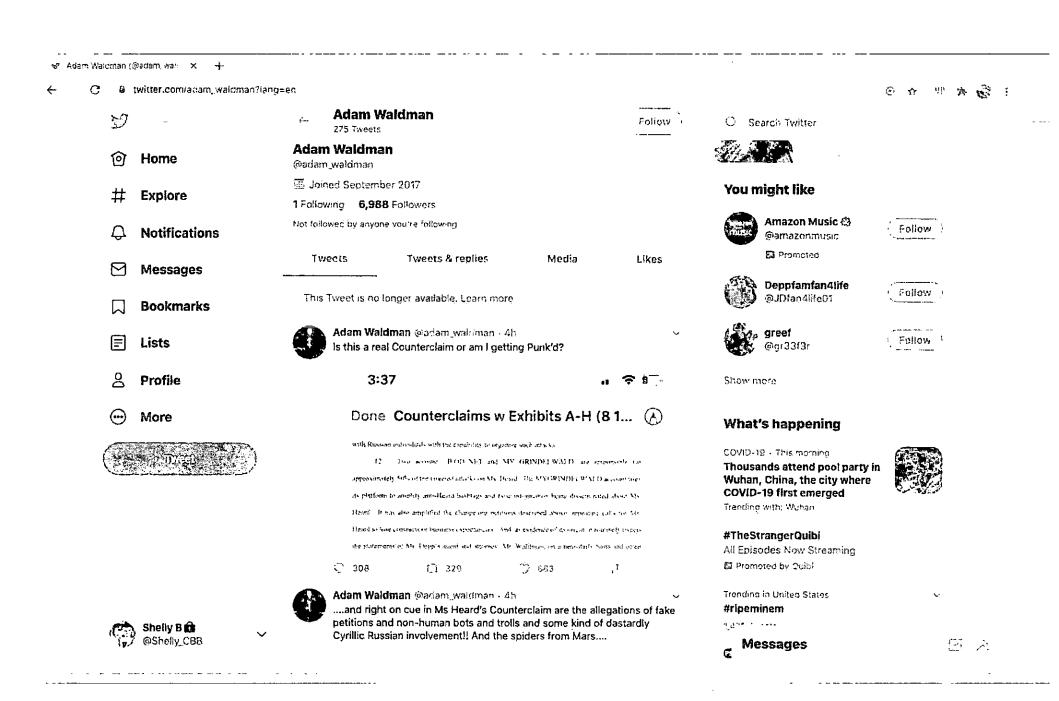


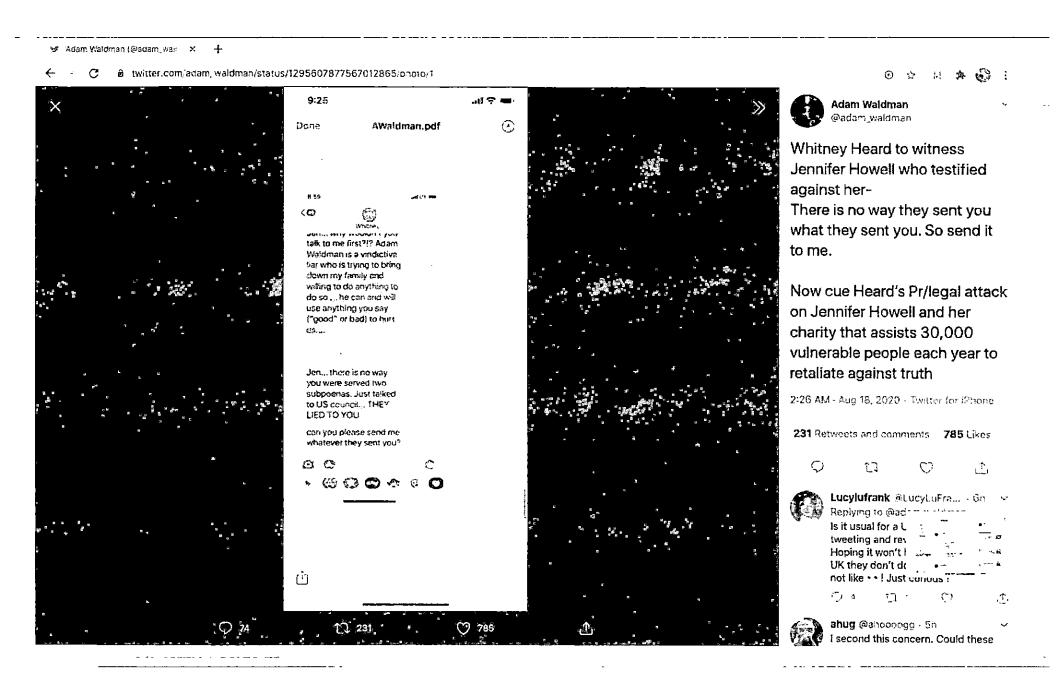
S Los Angeles Times ⊕ + 1 hour ago



tc Messages







🗗 Adam Waldman (@adam\_wall 🗶 👍 ■ twitter.com/adam\_waldman/status/1295716638579466241/photo/1 3:37 A 💬 🔻 X Done Counterclaims w Exhibits A-H (8 1... (4) Q 308 1329 ₩ 884 企

Adam Waldman @adam waldman

## Is this a real Counterclaim or am I getting Punk'd?

9:38 AM - Aug 18, 2020 - Twitter for iPhonic

329 Retweets and comments 884 Likes



TheRealLauraB @TheRe .. 46 -Replying to @adam waldman
Maybe we should all file Amicus
Curiae briefs

7 6 7 67

Th Bel

TheRealLauraB @TheRe... 3h Better yet.

TheRealLauraB @TheR.. - 3h

If your account was named in the counter claim I imagine you could make a voluntary "narrative statement" and submit it to any one if his attorneys listed on court docs. His attorney could then decide to follow up. Obviously you'll need to state you're real identity & motivations

Show this thread

토 그 그 그 그

Grindelwald @mherndar. → 4h. Replying to Nadam walcomen I'm famous ₹₹





Amber Heard and her legal brain trust make the serious claim in court and global pr spasm that witnesses were threatened and intimidated. That's because they don't like the witness testimony. This is the only witness to whom they have referred. Judge the evidence for vourself.

9:04 AM - Sep 2, 2020 - Twitter for iPhone

157 Retweets 23 Quote Tweets

525 Likes







YoNoHe Side @yonohe... - 52m - -Replying to Godam waldman AH can't comprehend treating someone with respect and telling the truth. She is projecting her own loose morals onto others. She is a disgrace.

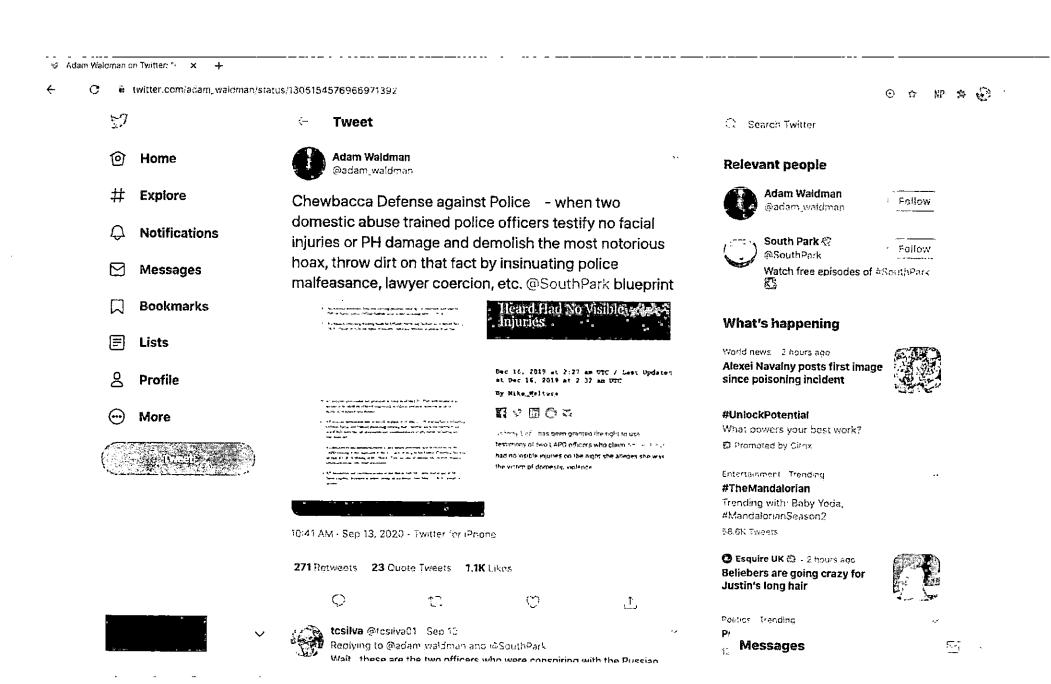


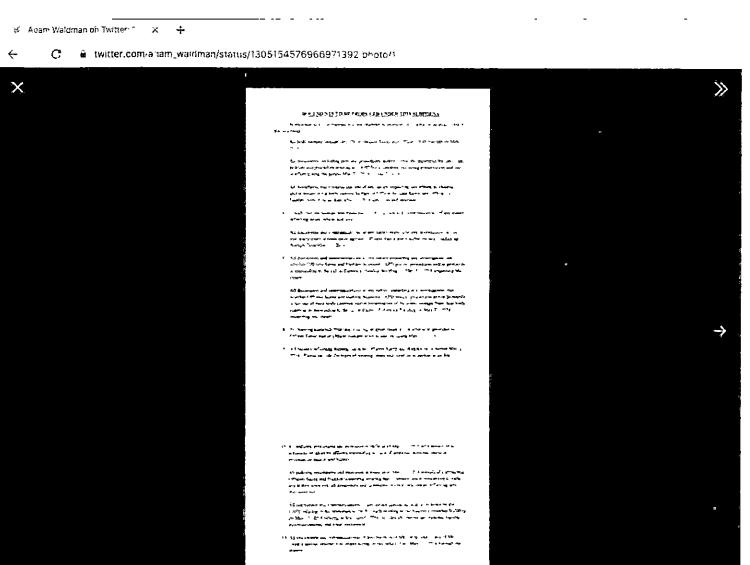






YoNoHe Sido @yonono... - 53m - - -Replying to Gadam\_waldman I am scared just reading all those polite please and thank yous! I just don't know how you can live with yourself! Fancy treating someone





294

O 19K

**O** 

Adam Waldman

Chewbacca Defense against
Police - when two domestic
abuse trained police officers
testify no facial injuries or PH
damage and demolish the most
notorious hoax, throw dirt on
that fact by insinuating police
malfeasance, lawyer coercion,
etc. @SouthPark blueprint

10:41 AM - Seb 13, 2020 Twitter for iPhone

271 Retweets 23 Quote Tweets 1.1K Likes

🖎 tesi

چہ سمیر ایس نو  $\bigcirc$ 

\_1

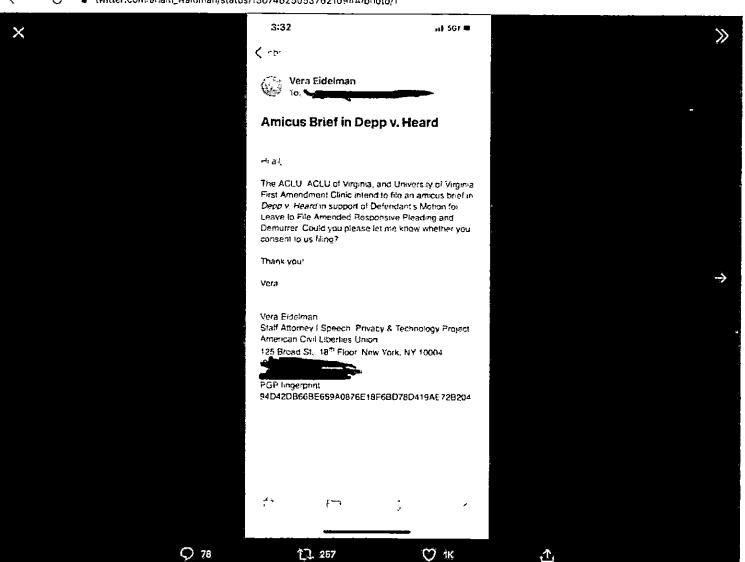


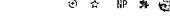
tosilva @toshva01 | Sep 13 | Y Replying to @adam walgma cano @SouthPark

Wait.. these are the two officers who were conspiring with the Russian bots paid by the North Korean government, tha some alien force spying for the cc who were best fi

with whom you ! .

I more reply







Adam Waldman @adam waldman

Res Ipsa Loquitur.

Transiate Tivest

7:32 PV Sec 19 2020 Twitter for iPhone

224 Retweets 33 Quota Tweets 1K Likes



💖 Psilence exile - Sep 19 Replying to @adam woldman Wait WHAT. Amber Heard has a contract with ACLU throughout all these years and nobody even questioned it before? THIS IS JUST SO GROSS. She isn't an advocate for our rights. That's all about money. What a fring SHAME!

- 7 € 16 16

3 242

3 mornifed le



Jadie ♥ fg Loreia;Millet | Sep 19 Replying to Cladam waldman

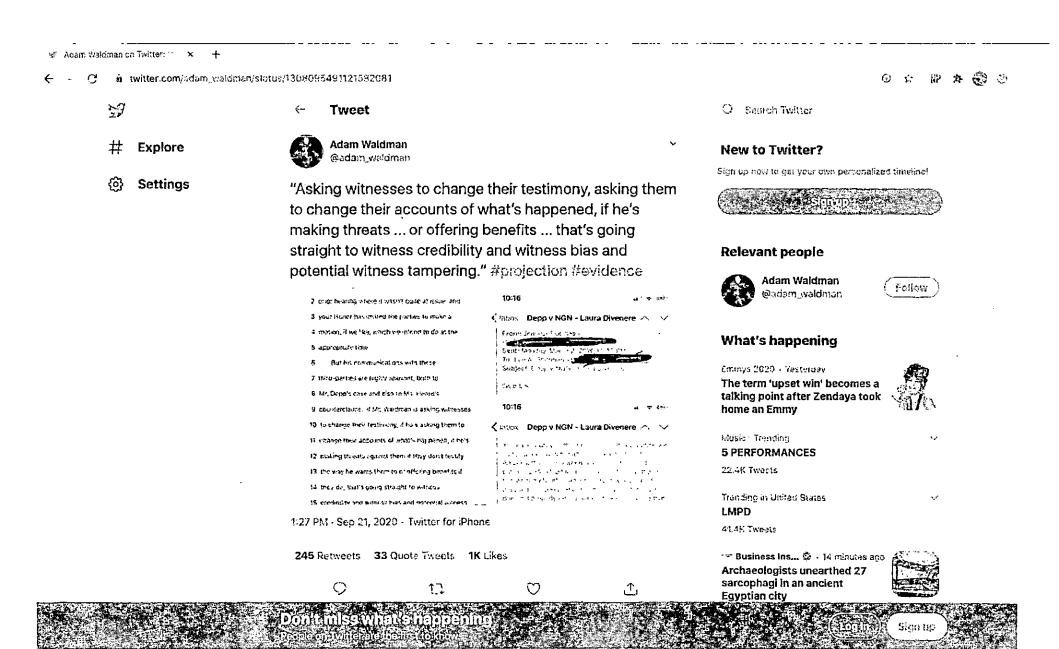
Can someone dumb this down for me please? Does this mean the aclu don't want to give the financials over?

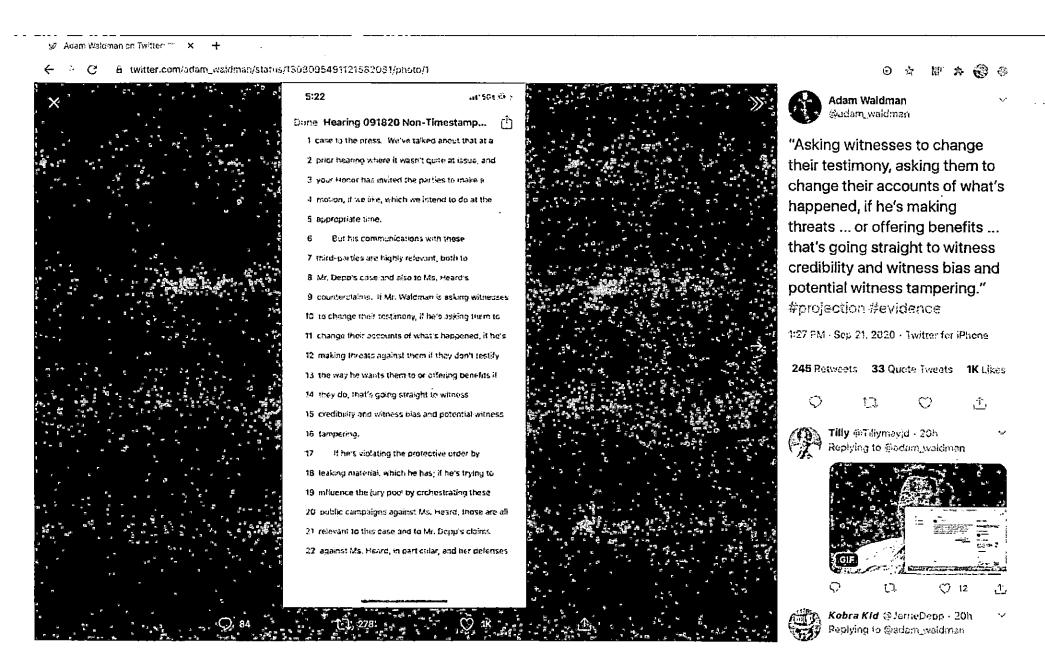
U

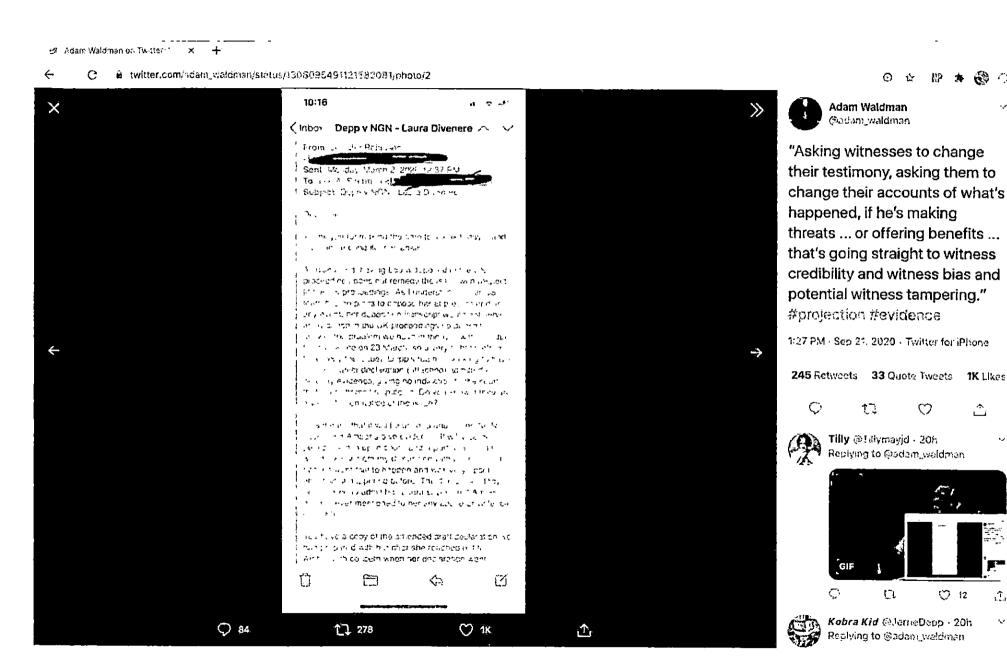
(\*) 2g

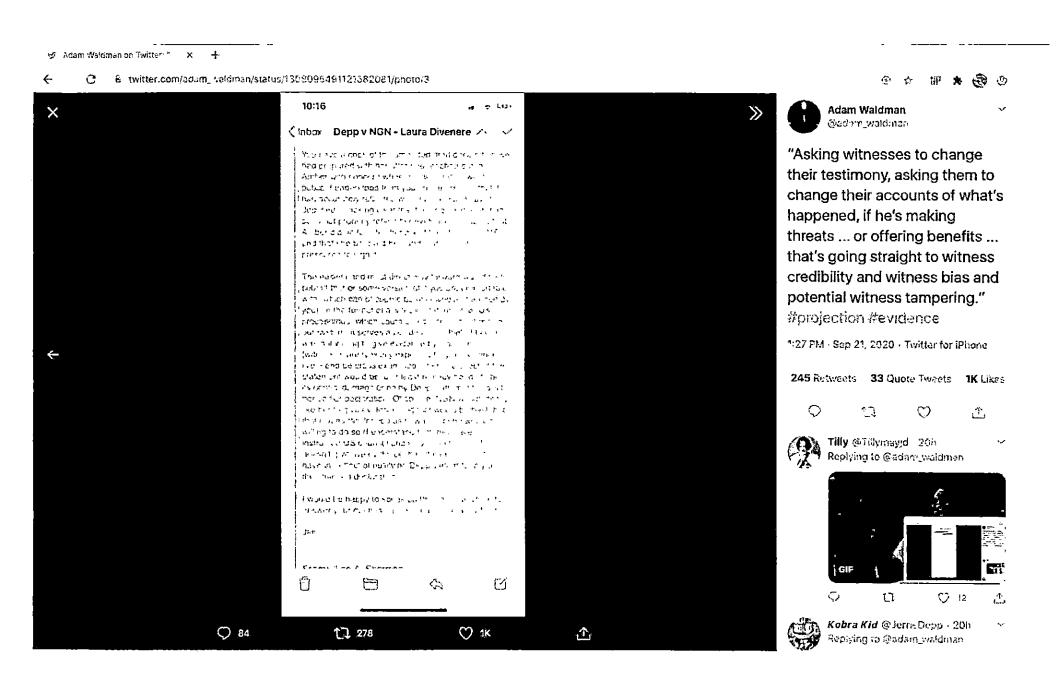


Dr. Dara Scally @dar... Sep 19 Replying to Gadem we dinon These emails are dated 2018/2019. Although I'm not sure, I think Adam Waldman has discovered information









171

♥ 3.1K

Q 107

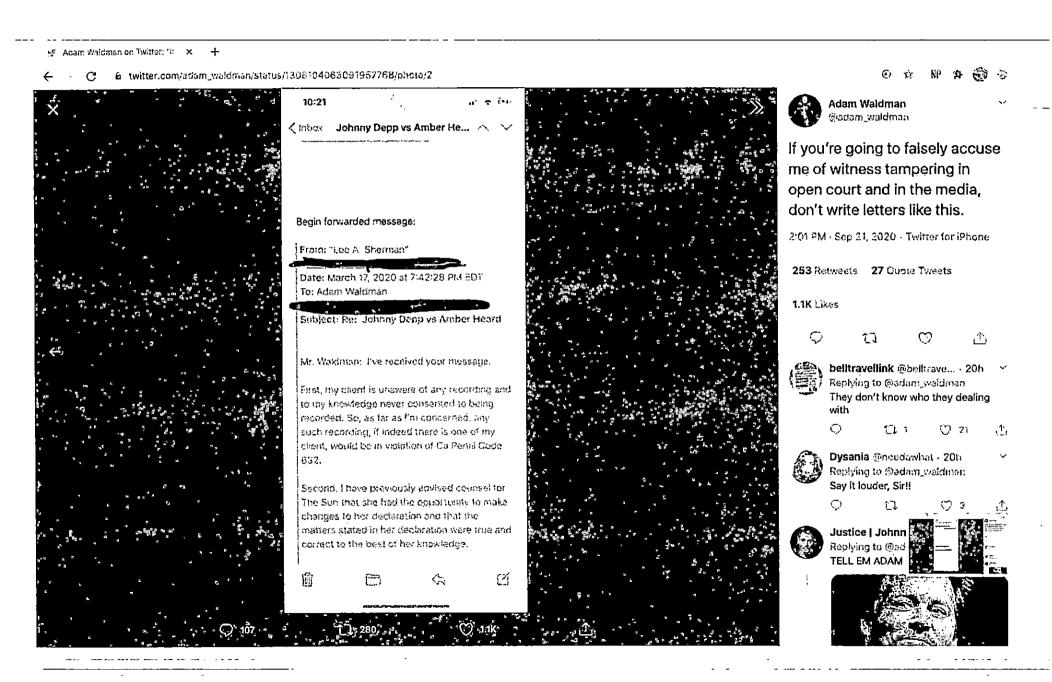
280

1

Ţ,

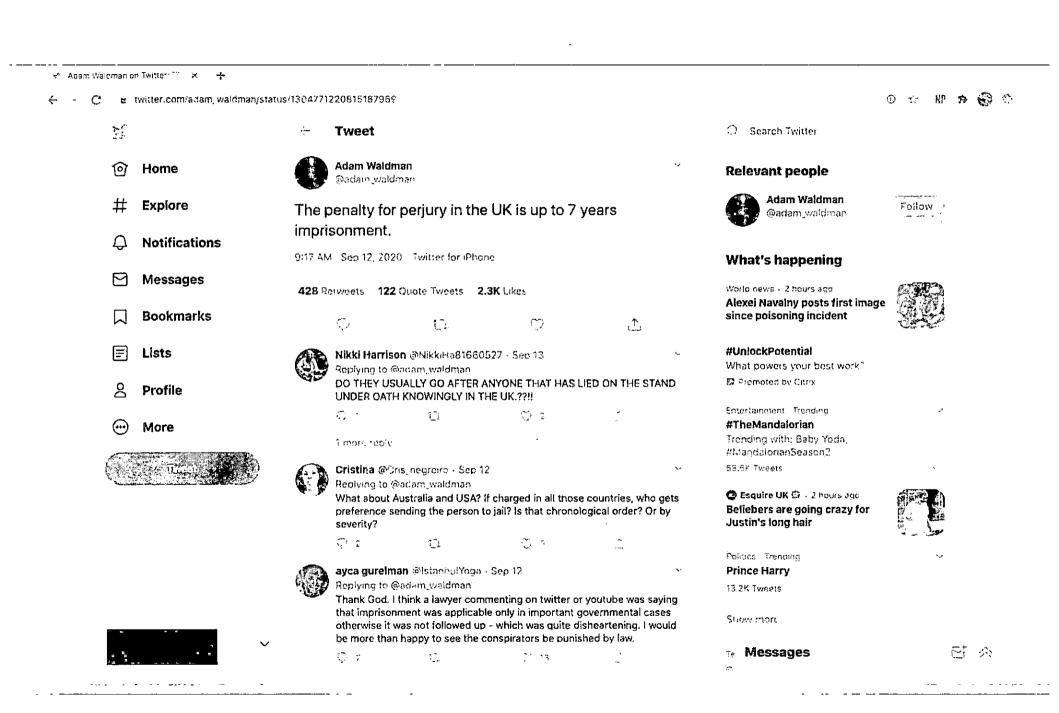
ŝ

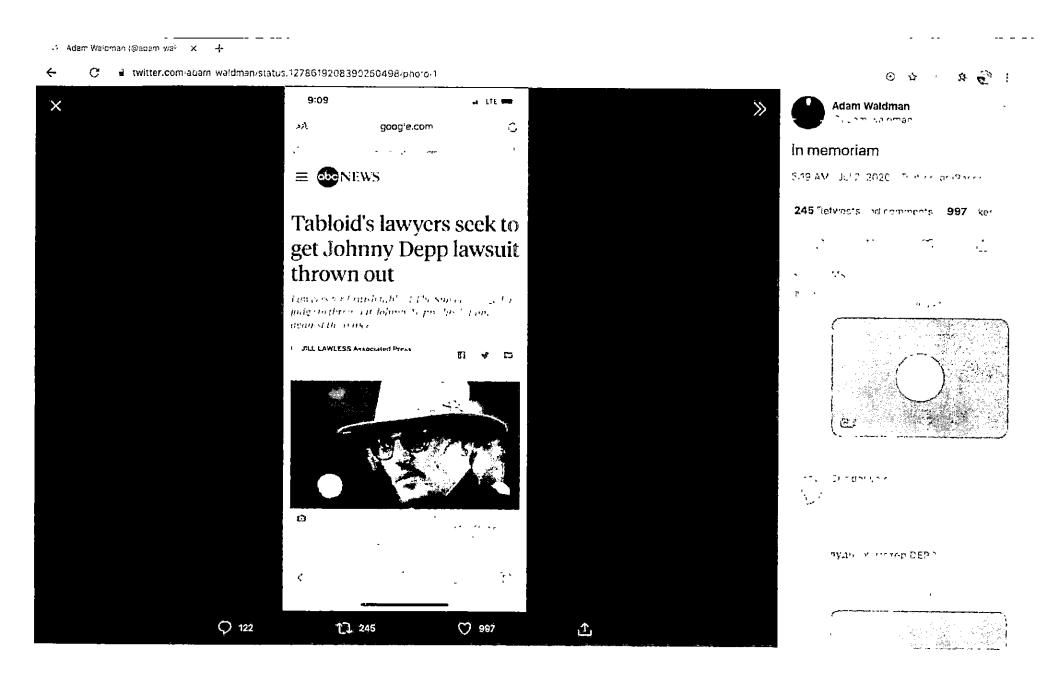
Replying to @ad **TELL EM ADAM** 

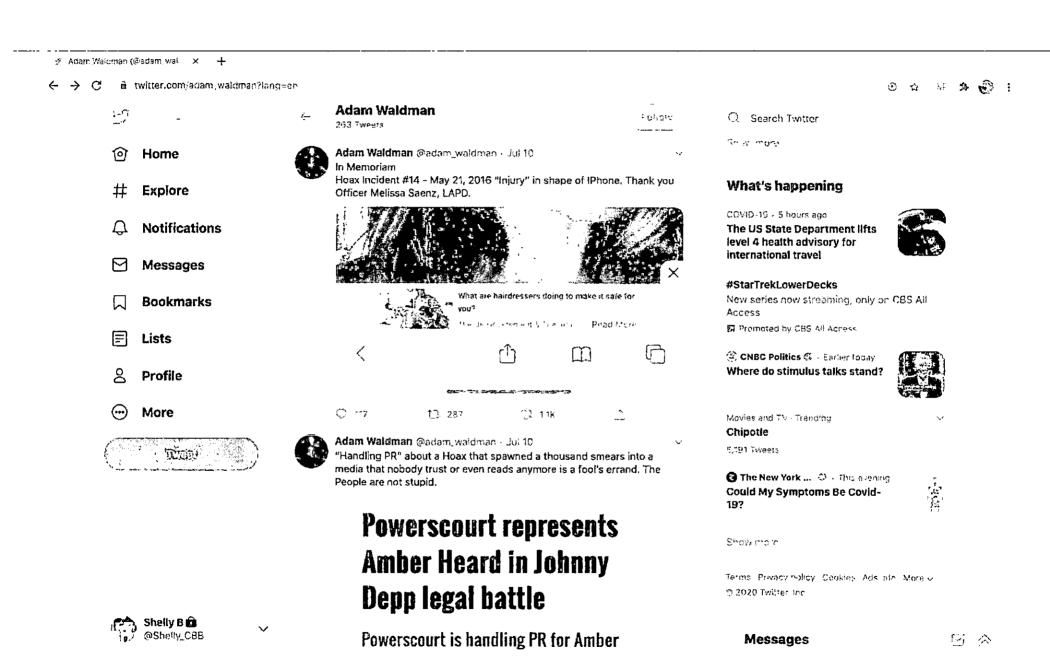


# Exhibit 6

# Adam Waldman Insulting & "In Memoriam" Statements/Tweets









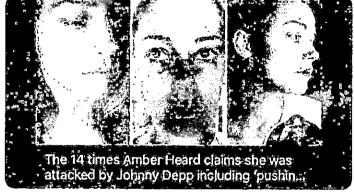


203 Weats

rollo"

Adam Waldman @adam\_waldmar \_\_uul 11

To those who say after you've pulled the #ring are, it's a little late to get back in the plane



Adam Waldman @adam\_waldmar - Jul 11

[] 2º1

Freedom to say whatever you want without consequences is one of the principal benefits of irrelevancy.

177 118

Ladies! Looking for some gratitude in the middle of a pandemic? At least this hot mess isn't going to pummel your face today. Cue the shadow "fan" accounts 🤣 🥸 🚀

#W/his chSabilatinavian an



#### What's happening

News - Last night

Bride 'happy to be alive' after wedding video captures Beirut blast



#### #StarTrekLowerDecks

New series now streaming, only on CBS Alt. Access

@ Promoten by CBS At Access

(A) CNBC Politics Cl + Earlier today Where do stimulus talks stand?



Movies and TV - Trending

#### Chipotle

5 170 Tweets

\*\* Financial Times "a - "his morning. Here's everything you need to know about the Beirut explosion



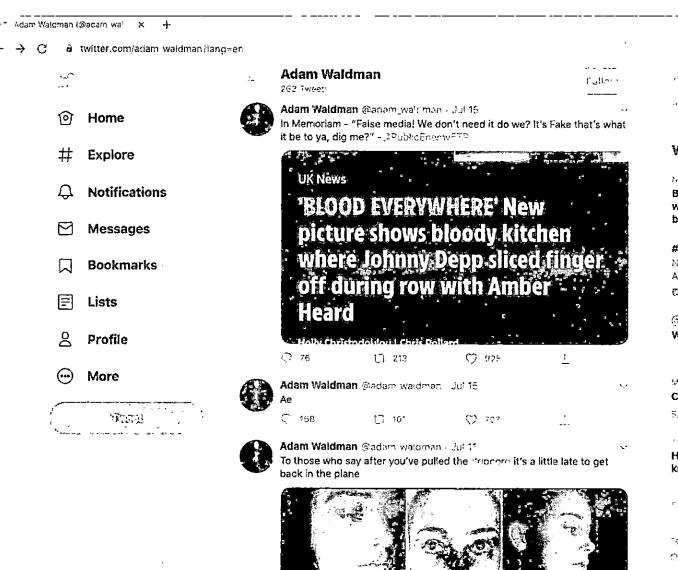
\$ 10 to 1000

Terms Privacy believ Cookies Adsinfo More @ 2020 Twitter Inc.









Shelly B @ @Shelly C8B



Search Twitter

7.15

#### What's happening

News - Last night

Bride 'happy to be alive' after wedding video captures Beirut blast



#### #StarTrekLowerDecks

New series new streaming, only on CBS All Access

@ Promoted by CBS All Access

© CNBC Politics & Eather today
Where do stimulus talks stand?



Maxies and TV - Trending

#### Chipotle

5,170 Twee's

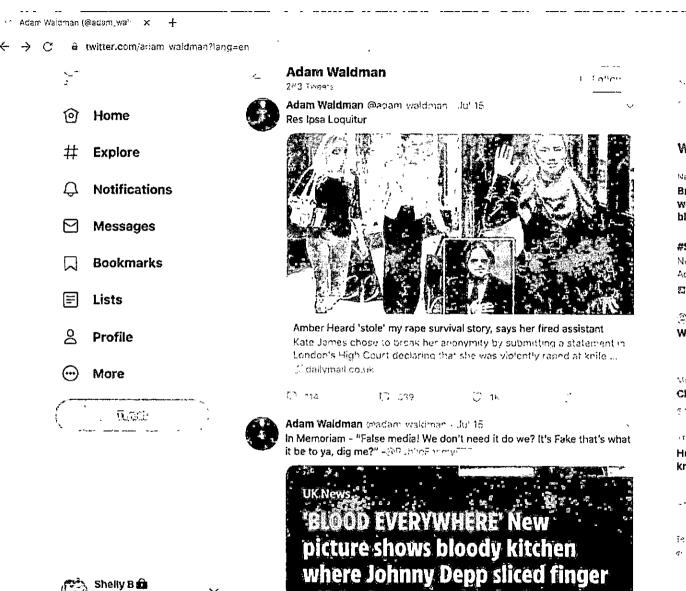
\*\* Financial Times © - This marring Here's everything you need to know about the Beirut explosion



Enter Tipe

Term: Privacy policy Cookies Advinto More -© 2020 Twitter Inc.





@Shelly\_CBB



Searce Twitter

#### What's happening

News - Last might

Bride 'happy to be alive' after wedding video captures Beirut blast



#### #StarTrekLowerDecks

New series now streaming, only on CBS All Access

2 Promoted by CBS All Access

© CNBC Politics • Earlier today Where do stimulus talks stand?



Movies and TV Frending

#### Chipotle

5 170 Tweets

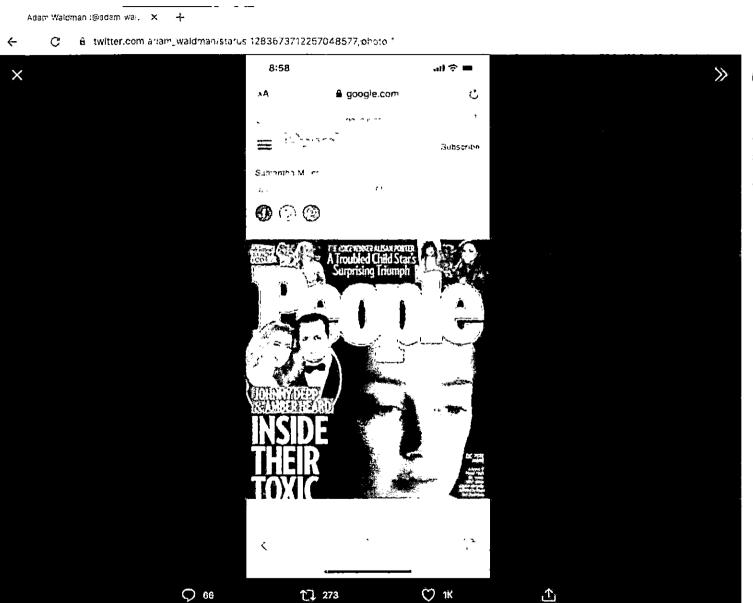
Financial Times & This morning Here's everything you need to know about the Beirut explosion



and make

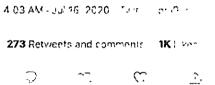
Termin Privacy policy Cookies Ade no More - Privacy policy Inc.







In Memoriam. Every story starts somewhere. @people this story started with you.





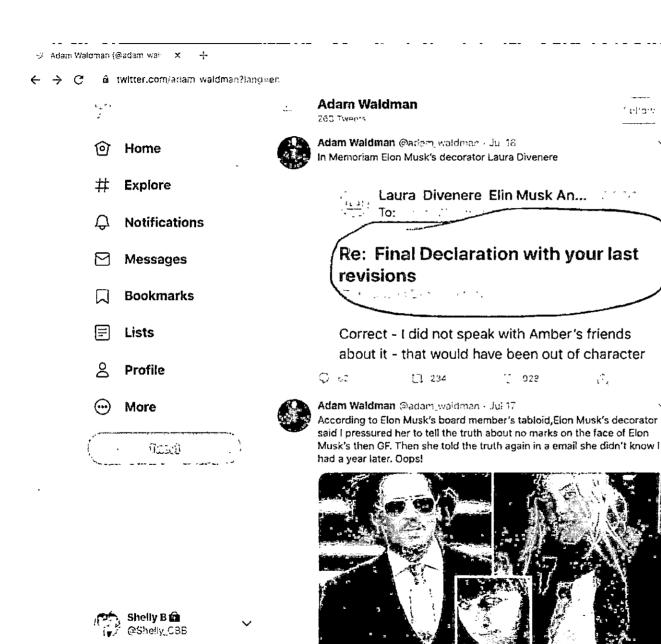


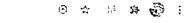
3 û

#### In Memoriam

8:36 AM us 17, 2020 14 morths Phone

242 Retweets and comments 940 Likes





Search Twitter

#### What's happening

News - Last night

Being maser

Bride 'happy to be alive' after wedding video captures Beirut blast



#### #StarTrekLowerDecks

New series now streaming, only on CBS All Access

Promoted by CBS All Access

(a) CNBC Politics (b) - Earlier today

Where do stimulus talks stand?



Movies and TV - Trending

#### Chipotle

5 170 Tweets

De Financial Times (2) - This morning Here's everything you need to know about the Belrut explosion

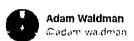


المستران المتداد

Terms Privacy agricy Cookies Adminto Maren 9,2020 (witter Inc.)



Adam Waldman (@adam\_wa/ X € twitter.com/adam waldman/status/1284394167158833153/photo;1 7:23 X < ~ Laura Divenere Elin Musk An... Re: Final Declaration with your last revisions Correct - I did not speak with Amber's friends about it - that would have been out of character and something I would have recall on. The only thing that would have been said was something like asking how she was doing That said? I have been racking my brain this past week trying to recall what were the times like when I saw her immediately after the breakup, and in all honesty I can't say 100% for certain that it wasn't brought up. I'm inclined to think she had mentioned it because given the circumstances it would have (I think) been normal to do so t also just wouldn't have been the merassable to pre at the time as it was common knowledge their relationship was difficult, and because I hadn't noticed any signs of physical abuse. 928 Q 62, 234



### In Memoriam Elon Musk's decorator Laura Divenere

3:46 AM JU13 2020 THEFT

234 Retweers and comments 928 Lives



Lumos SK @Sk! umos - Juli 19 Replying to @addim walgener Can't we use this as evidence?

- 1 -- W

Rahul Raj @Rahul Albus . . . 18 . i think there was something they said about discussing that on Monday

Jasnah @jasnasholin Juli 18
Replying to the continue design
She is now forever known as Laura "I will perjure myself to please

T) . \* 1 7 () as

everyone" Divenere.

from one side to another

Viqala fittingalay Jul 18
I really dont get her. Court is serious.
DV is serious. So how about just tell the truth of what you remember no matter who's side is asking you to.
Then you won't be running in panic

\* Adam Waldman (@adam wa' X + ■ twitter.com adam waldman/status 1284171756185574656/photo/ Adam Waldman aladem waldman In Memoriam Elon Musk's decorator Laura Divenere. Transfir - --These are Ms. Divenere, I think 1103 PV Ju 17 2020 - T 11 16:25:52 130-11 220 Retwents and comments 896 Likes you can see at the top that is her email address. I think 16:25:57 Joanne @t/prie/01Rose Jul 17 130-12 Replying to Continuous amor that is the, she works for Mr. Musk. Adam, I was concerned, Now I'm not. And that forwarded to Thank you!! 16:26:03 The metadata issue is nothing to 130-13 worry about is it? Mr. Murphy, and you will see below 1 43 are the e-mails we were 16:26:08 This Tweet is from an achount that no longer exists, and limit 130-14 looking at to which Mr. Sherman A PAPP took objection. Princess Consuela Ba... - Jul 17 🕓 Replying to haden paramen This Laura got on my nerves so bad today. I wonder how much spacemoron offered her to buy her dignity, I'm so done with these people. 1 220 ♥ 896 Kat Tapestry @KotToo - 18117 - - -

Says Smele, "In the conversation, Ms. Divenere apologizes to Ms. Heard for making the Declaration, explains that Mr. Waldman had pressured her into doing it, and even asks Ms. Heard to contact her attorneys to 'get me to do a declaration too and question me so that I can say

@eriggardner of all the reporters, why did @TheSun leak what we now know - from multiple subsequent writings by Divenere and her lawyer - is

both an illegally recorded and lying tape to you and @THP? roughting puritions previous unit stourts.

○ 30

Adam Waldman @adam\_waldman - Jul 18 In Memoriam

13 154

Adam Waldman

Adam Waldman @adam waldman Jul 18

263 Tweets

@TheSun #MeToo & source testifying against them. @TheSun asked Ms Kendall precisely zero questions about her testimony.



'I heard several times that it was Amber who hit Johnny', MeToo activist tells high court

Katherine Kendall accuses the paper of ignoring

Search Twitter

Show more

Fallow 1

1,

### What's happening

News - Last night

Bride 'happy to be alive' after wedding video captures Beirut blast



S & 11 A @ :

#### #StarTrekLowerDecks

New series now streaming, only on CBS All Access

C Promoted by CBS Ali Access

A CNBC Politics O - Earlier today Where do stimulus talks stand?



Movies and TV - Trending

#### Chipotle

5170 Tweets

Financial Times Q This inoming Here's everything you need to know about the Beirut explosion



Jack mate

Termin Privacy policy Gookies Adainto More -@ 2020 Twitter Inc.

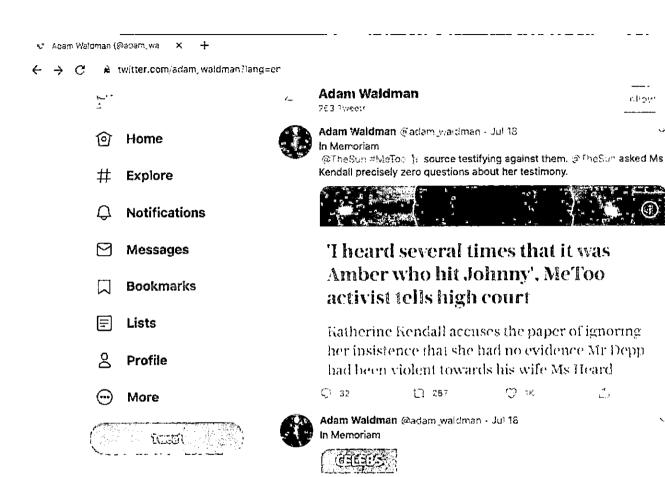
Messages





More





**Amanda de Cadenet** won't appear at Johnny Depp libel trial after claiming she was 'misled' by Amber

Search Twitter

Google mark

chage

# What's happening

News Last night

Bride 'happy to be alive' after wedding video captures Beirut blast



#### #StarTrekLowerDecks

New series now streaming, only on CBS All

Promoted by CBS All Access

CNBC Politics 12 - Earlier today Where do stimulus talks stand?



Movies and TV - Trending

#### Chipotle

5,170 Tweets

😐 Financial Times 🖾 . This morning Here's everything you need to know about the Beirut explosion

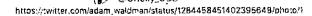


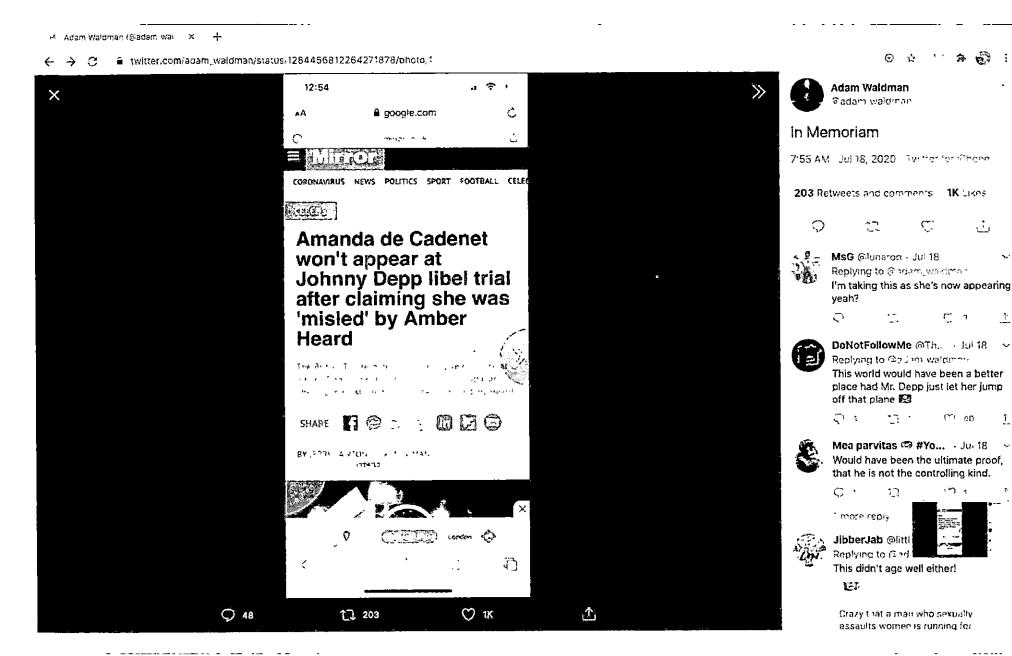
Show more

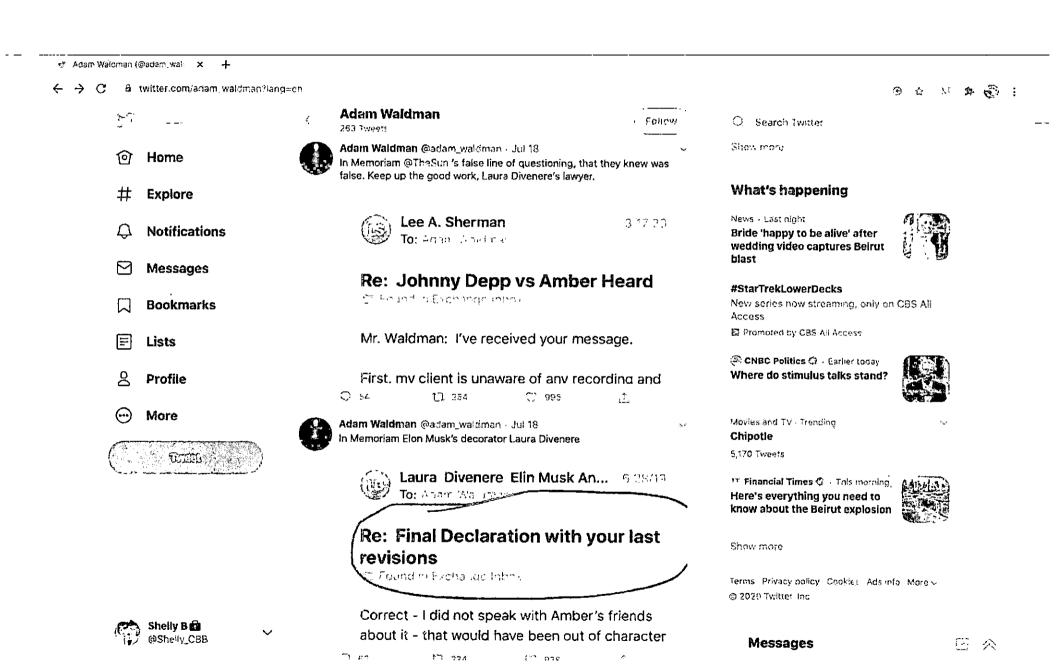
Terms Privacy policy Cookies Ads into More -C 2020 Twitter Inc.

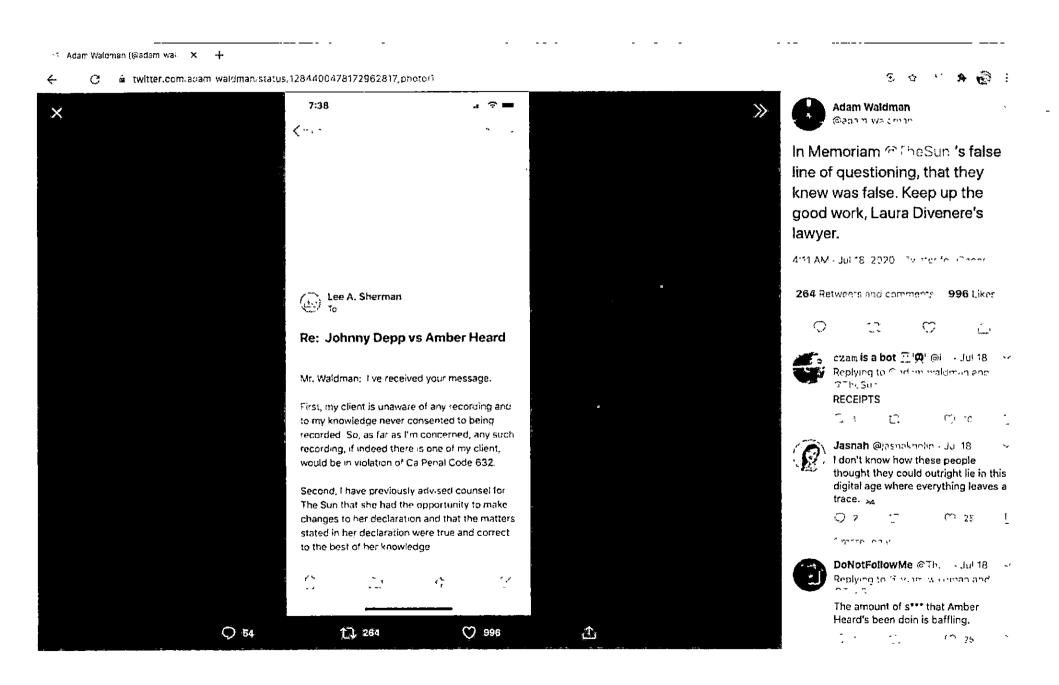
Messages

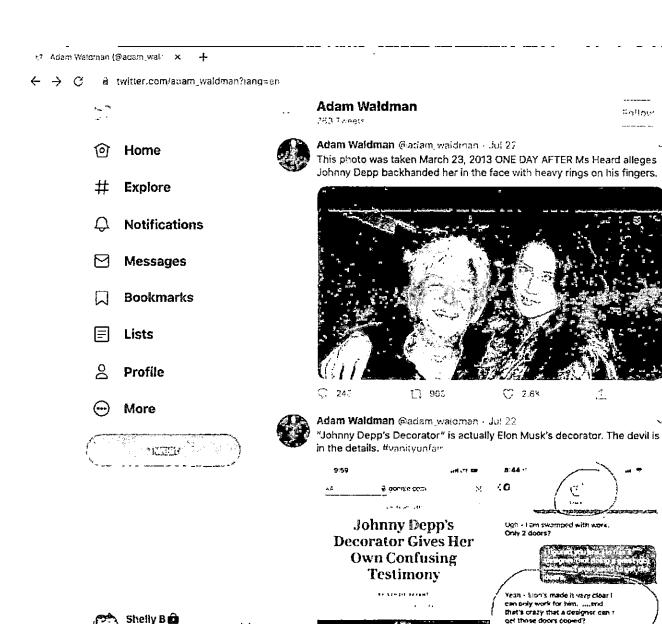












@Shelly\_CB5



# What's happening

News - East might

5 - 4 - - 2 - 1

Bride 'happy to be alive' after wedding video captures Beirut blast



#### #StarTrekLowerDecks

New series now streaming, only on CBS All Access

☐ Promoted by CBS All Access

© CNBC Politics © Earner today
Where do stimulus talks stand?



Movies and TV Trending Chipotle

5 170 Tweets

\*\* Financial Times \*\*? • This morning Here's everything you need to know about the Beirut explosion



Shari mare

Terms Privacy policy Cookies Adsinfo Moreik © 2070 Lwitter Inc

Messages



# Deppheads wage cyberwar on

Ţ,

icto.

Nice Photo taken March 23, 2013 one day after she claimed Johnny smashed her in the face with heavily ringed fingers. Confronted, Amber testified she sees swelling in the pic. Whitney then testified she sees swelling and a SPLIT LIP. Do you Believe them or your own lying eyes?



Search Twitter

Charle general

## What's happening

News Last night

Bride 'happy to be alive' after wedding video captures Beirut blast



#### #StarTrekLowerDecks

New series now streaming, only on CBS All Access

El Promoted by CBS All Access

□ Financial Times & This morning. Here's everything you need to know about the Beirut explosion



Movies and TV - Trending

Chipotle

5.155 Tweets

(4) CNBC Politics (\* Earner tophy Where do stimulus talks stand?



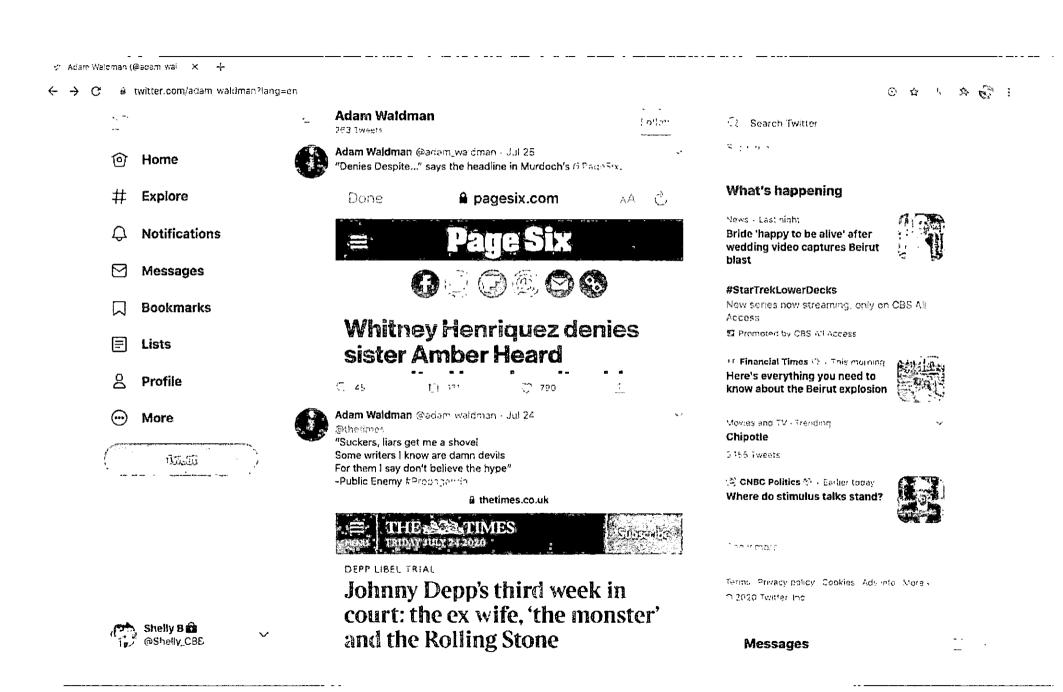
Bree more

Terms Privacy holicy Cookies Ads ato Mare v. © 7070 Twitter for

Messages







Divorce

€: 53

Adam Waldman @adam\_waldman - Aug 5

11 195

Here is the "expert" that Saudi-owned @varing chose to "inform" their smear: @GloriaAlfred, who met with Heard about repping her, who took 40% of her Weinstein victim's small settlement \$, and who's daughter Lisa Bloom got busted repping Weinstein. #expertbuckchase:

HOME > PILM > NEWS

Grant rommon rain br

Can Johnny Depp's Career Survive His Salacious Trial?

By Elizabeth Wagmeister

Adam Waldman

263 Tweets

rallow

Adam Waldman @adam\_waldman - Aug 5 @EWagmeister @Variety

In Memoriam - associations past.

Here is your "expert" @GiariaAlfred you had bloviate on the career effects of the UK libel trial. Do you think The People are stupid?

HOME > MOVIES

Amber Heard Meets with Famed Lawyer Gloria Allred's Firm Amid Acrimonious Johnny Depp

C) 864

1

JT Larson @Leoplady

**Explore Credit Unions** 

Fairy Naa 📜 🐧 😘

@Explore CU

☑ Promoted

@FairyNaa10

Search Twitter

You might like

Follow

Follow -

Follow /

Show more

# What's happening

News - Last night

Bride 'happy to be alive' after wedding video captures Beirut blast



Messages

Fi A

**Bookmarks** 

Lists

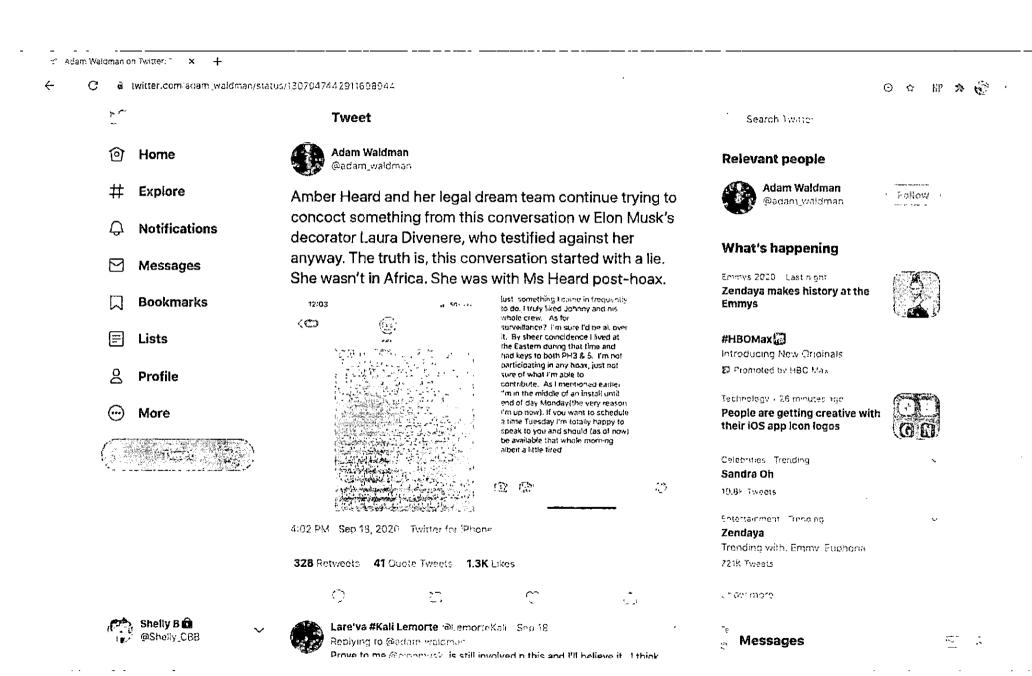
**Profile** 

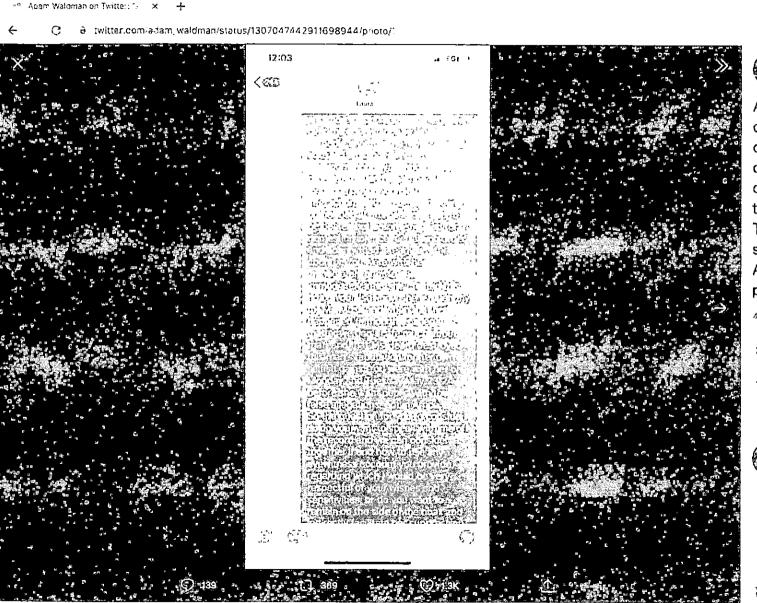
More



@Shelly\_CBS

https://witter.com/adam\_waldman/status/1290945774721929216/ohoto/1







Amber Heard and her legal dream team continue trying to concoct something from this conversation w Elon Musk's decorator Laura Divenere, who testified against her anyway. The truth is, this conversation started with a lie. She wasn't in Africa. She was with Ms Heard post-hoax.

4 02 PM - Sep 18 2020 Twitter for iPhone

328 Retweets 41 Quate Tweets

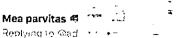
1.3K Likes

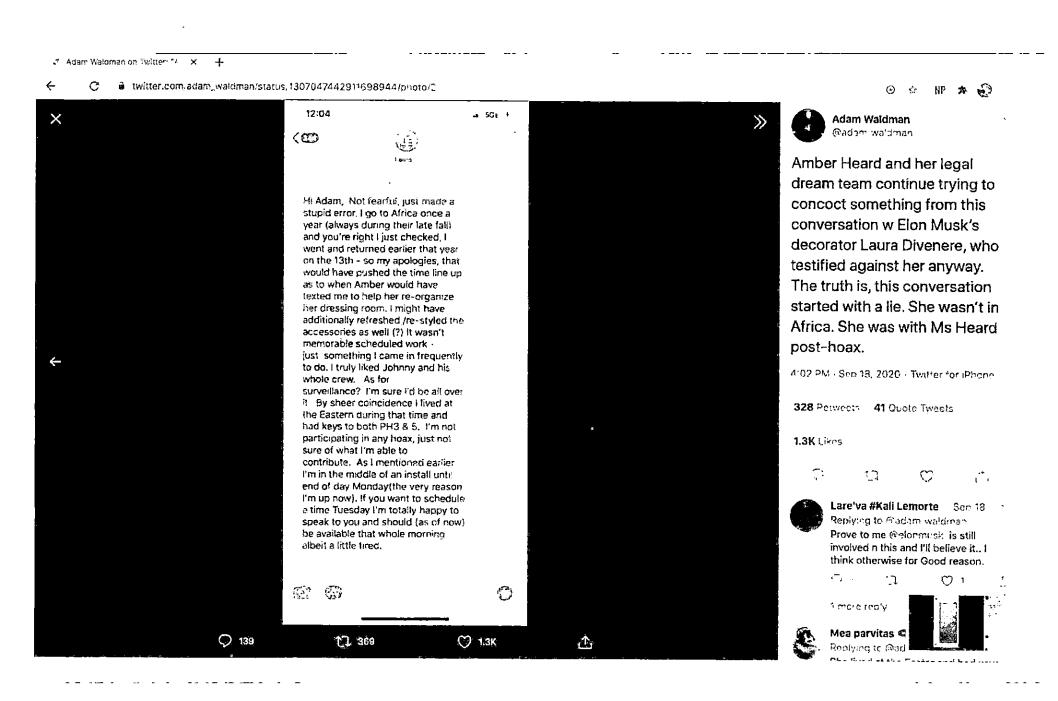


Prove to me @elonmosk is still involved in this and I'll believe it. I think otherwise for Good reason.



ा इ





# Exhibit 7

PUBLICATION	DATE	QUOTE(S)
Daily Mail "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"	3-26-20	"Elon Musk and Amber Heard seem not to know that Mr. Depp's penthouse elevator button that says 'M' does not take you to Mars."
Blast "Johnny Depp's ex-wife, Vanessa Paradis, calls Amber Heard's violent allegations 'False Facts'"	3-16-20	"Amber Heard attempted to project her own history of abusing others onto Johnny Depp. A groundswell of sworn statements rejecting Heard's bogus characterization from those who have known and loved Johnny for decades should surprise no one. In contrast, Amber Heard's confederated and erstwhile witnesses are now crumbling like cookies, recanting their testimony and pulling away from her hoax."  "Amber Heard subpoenaed her own and Mr. Depp's texts with their talent agent, hoping for a word or sentence she could cherrypick and give to her media friends. Be careful what you wish for. Instead, another time capsule of truth has arrived to further obliterate Amber Heard's abuse hoax. The texts show Ms. Heard stalking Mr. Depp, luring him to a meeting in San Francisco that violates the restraining order she herself fraudulently obtained and then attempting a 'ruse' to improve her reputation and divorce settlement terms. Throughout the texts, Mr. Depp consistently and emotionally denies her fake wife-beating claims against him. And this is merely a middle chapter in what remains a long book of physical evidence."

The Telegraph "Johnny Depp told doctor he chopped off his own finger"	3-18-20	"What the court heard today was not evidence – it was Amber Heard's newest storyline about a 'late night bust up.' Facts matter. Back in reality, as hospital records and eyewitness testimony show, Amber Heard's attack story could not have occurred the night of Sunday, March 8, 2015 as she alleged. Because Johnny Depp went to the hospital the early AFTERNOON of March 8, 2015 to reattach the finger Amber Heard severed, and Mr. Depp did not see her again in Australia. Our opponents are so lost in their lies, they can't even get their fake sequence of events, times or dates straight."
The Telegraph "Elon Musk urges Johnny Depp and Amber Heard to 'bury the hatchet' in ongoing legal battle"	6-19-20	"The reason Elon Musk keeps publicly repeating that he did not begin 'dating' Amber Heard until June 23, 2016 – 'one month after her divorce filing' – is simple. Overwhelming testimonial and other evidence places Elon Musk at the scene of the crime during Amber Heard's May 2016 abuse hoax fraud."
Daily Mail "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"	4-8-20	"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. Today Ms. Heard appropriated important court privacy rules designed to protect real victims as a shield behind which Ms. Heard's most absurd new claims can hide. Mr. Depp, contrary to the desperate claims of Ms. Heard, too a 'neutral' position in today's hearing. Public or private, it will make no difference to our obliteration of Ms. Heard's new-but-not-improved hoax with mushrooming evidence including her own secretly recorded audio tapes."

<u> </u>		
The Mirror  "Amber Heard 'was serially violent to Johnny Depp and concocted abuse hoax' his lawyer claims"	2-2-20	"The first of Amber Heard's confessional recordings of her conversation with Johnny Depp expose that Ms. Heard was serially violent towards Mr. Depp and then concocted an elaborate abuse hoax to cover it up. Shockingly, Ms. Heard claims her motive was that Mr. Depp was always trying to 'split' to escape her abuse."  "Mr. Depp's trial against Heard's partner the Sun begins March 23 – institutions and individuals who have served as Amber Heard's co-conspirators will face their reckoning next. We have rained facts for years on a media that refuses to report them. In the end #JusticeforJohnnyDepp only comes because THE PEOPLE viewed the evidence and demand it."
Blast "Amber Heard loses 'Time's Up' attorney Roberta Kaplan in Johnny Depp case"	6-15-20	"For years, #TimesUp and others inexplicably hitched their wagons to Amber Heard's abuse hoax. Ms. Heard's lawyers, one of whom co-founded the #TimesUp Legal Defense Fund, have now apparently unhitched from Ms. Heard's long-disproven frauds. We intend to discover why."
Daily Mail "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"	3-20-20	"Whatever Amber Heard is eating in her August 13, 2016 deposition, it is certainly not truth serum. And she ignores the fact that bathroom doors open in, not out. We have assembled a giant, ever-growing body of evidence to expose her ever-growing abuse allegations as a hoax. But our star witness turns out to be the serially violent Amber Heard herself, perjuring remorselessly in a sworn 2016 video deposition that we've just obtained, and then exposing her diabolical lies with her own friends and employees' testimony, subsequently discovered audio recordings, text messages, CCTV footage, TV

		appearances, multiple frauds, attempts to suborn perjury and documents abuse of others."
The Mirror "Amber Heard had threesome affair with Cara Delevingne and Elon Musk, says witness during Johnny Depp lawsuit"	6-17-20	"Despite his repeated public statements to the contrary, witnesses testified Elon Musk was spending late nights in Johnny Depp's penthouse with Amber Heard as early as one month after Ms. Heard married Mr. Depp."
The Sun  "Amber Heard hits back at Johnny Depp in shocking court docs detailing 'violent rages and drug binges'"	4-12-19	"A hoax confronted with the reality of evidence requires new lies to sustain itself. Yesterday's filing, made by a woman with a prior arrest and incarceration for domestic abuse, presented Amber Heard's new lies."
Blast "Amber Heard's father accused to threatening to shoot Johnny Depp"	11-30-19	"Mr. Killackey's chilling first-hand experience with Amber Heard and her family exposes the motive from behind Amber Heard's abuse hoax — money. Money is why Amber Heard moved her sister and four other co-conspirators into Johnny Depp's multimillion-dollar penthouses rent-free. Money is why Amber Heard chopped Mr. Depp's finger off with a thrown vodka bottle the day his attorney's asked her to sign a post-nuptial agreement. Money is why Amber Heard ambushed Mr. Depp with an abuse hoax the day he informed her he was divorcing her. Money is why Amber Heard's PR/legal team sent Mr. Depp an extortion letter prior to placing her hoax on the cover of People Magazing. Money is why Amber Heard's father threatened to kill Johnny Depp."
Blast "Amber Heard's mom texted Johnny Depp 'I love you, son' after	12-20-19	"Amber Heard's own parents acknowledged in writing that extortion, not abuse, was the true motive of Heard's hoax against Johnny Depp. According to multiple newly discovered text exchanges between Heard's

. [

alleged domestic		mother father and Mr. Denn written the
alleged domestic violence"		mother, father and Mr. Depp written the very day the previously arrested and incarcerated domestic abuser Heard was trailed by paparazzi into court with painted on bruises and obtained her temporary restraining order in 2016. 'Her dumb lawyer' made her do it, Heard's parents profoundly wrote to Depp on May 27, 2016. According to the parents' texts, the motive behind her hoax was simply not to be thrown our of Mr. Depp's penthouses in 30 days: 'it was her only option to not being kicked out, Heard's mom wrote to Mr. Depp. This stunning new evidence also brings into better focus the motives of Ms. Heard's perjurious co-conspirators who all claimed seeing mythical bruises the week of May 21, 2016, that 4 police officers, 33 sworn witnesses, 87 surveillance tapes, and evidence that keeps on coming all prove to be an unambiguous lie. Ms. Heard's freeloading co-conspirators ALL had keys and ALL lived rent-free in those same Johnny Depp penthouses Amber Heard's parents said her 'friggin lawyers' warned her she would lose."
Deadline "Johnny Depp ordered to release booze & drug use records in \$50m defamation case against Amber Heard; 'Pirates' start's lawyer blasts 'abuse hoax"	10-22-19	"Amber Heard no longer feigns any effort to prove her abuse hoax. If she wanted to do that, she and her co-conspirators would stop running from their depositions. Instead, Ms. Heard's #TimesUp legal team have moved on to the tactics their former client Harvey Weinstein perfected – smear the victim with PR innuendo. For the avoidance of doubt, the only person in this case who beat a woman is the self-appointed #MeToo spokesperson Amber Heard, and she was arrested and incarcerated for it. And she savagely beat others, as will be shown in trial."

Blast "Johnny Depp scores legal victory, allowed use of police testimony Amber Heard had no visible injuries"	12-16-19	"It's not complicated – either two domestic abuse-trained police officers are lying, or Amber Heard and her co-conspirators engaged in an abuse hoax. Ms. Heard and her friends testified that her face was smashed and the crime scene was carnage. Yet both responding police officers, including a female officer who has answered more than 100 domestic abuse calls, testified that after conducting two face to face interviews with Heard and two security sweeps of the premises, both Heard's face and the penthouse were unmarked. Which is the same thing 87 surveillance videos, over 30 separate sworn eyewitnesses, and two other responding police show."
PageSix "Warner Bros. 'freaking out' Depp suit will harm Harry Potter films	4-12-19	"Ms. Heard has a new problem besides defamation, perjury and filing and receiving a fraudulent temporary restraining order demand with the court: we are now interviewing other women who have come forward claiming they are victims of horrific acts of violence and other abuse at the hands of Amber Heard, in addition to Johnny Depp and Tasya van Ree, the latter of whom Ms. Heard was previously arrested and incarcerated for assaulting. We have now issued subpoenas to Amber Heard, her hoax assisting friends, Elon Musk and other witnesses to explain the avalanche of video, audio, photographic and testimonial evidence with which we intend to confront them."