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December 2, 2019

Hon. Bruce D. White
Fairfax County Circuit Court
4110 Chain Bridge Road
Fairfax, VA 22030

FILED
COURT SERVICES
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JOHN T. FREY
CLERK, CIRCUIT COURT
FAIRFAX, VA

Re: *John C. Depp, II v. Amber Laura Heard; Case No.: CL-2019-2911; Fairfax County Circuit Court*

Dear Judge White:

We write on behalf of Ms. Heard to inform the Court that, following our conference last week, two articles appeared this morning on celebrity gossip websites about a witness declaration that was supposedly filed in this case, in which a car mechanic, who we believe at one point repaired Ms. Heard's Ford Mustang and obviously has little to nothing to do with the alleged defamation/domestic abuse issues in this case, recounts a conversation he claims to have had with Ms. Heard's father.¹ One of the articles also includes a lengthy quote from one of Mr. Depp's attorneys, touting the declaration and making wild accusations about Ms. Heard and other witnesses in this case.

Leaving aside how any father might naturally react to the physical abuse of his daughter by her husband, it is important to note that in fact no such declaration has been filed in this case. Nor has any such declaration even been produced to us in discovery, which is particularly troubling given that we have been raising concerns for weeks about Mr. Depp's ongoing failure to meet his discovery obligations. *See, e.g.,* Def's Mot. for Continuance. And the few depositions already taken to date have revealed that Mr. Depp's lawyers have played a substantial role in drafting and editing other so-called witness declarations.²

We respectfully suggest that this conduct runs directly counter to the parties' discussion with the Court just last week. Through this letter, we express our continuing hope that after last week, Mr. Depp and his lawyers will now focus on meeting their discovery obligations rather than stoking the tabloids in a further effort to smear and abuse Ms. Heard.

¹ See <https://theblast.com/c/johnny-depp-amber-heard-dad-father-threatened-shoot-kill-court-death-threat>; <http://www.justjared.com/2019/12/01/amber-heards-father-accused-of-threatening-to-shoot-johnny-depp-report/>.

² Although Mr. Depp has noticed numerous depositions in this case, we are not aware of him issuing any deposition notice or subpoena to this witness, for whom Mr. Depp's attorneys are now falsely claiming to have obtained and filed a declaration.

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Respectfully,

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cc: Other Counsel of Record