

VIRGINIA, IN THE CIRCUIT COURT OF FAIRFAX COUNTY

JOHN C. DEPP, II
Plaintiff
V.
AMBER LAURA HEARD
Defendant

FILED
ADMINISTRATION
2022 APR 18 AM 8:56
J. T. BREY
CLERK, CIRCUIT COURT
FAIRFAX, VA

Civil Action No.: CL-2019-0002911

Date: 18 April 2022

Your Honor,

I would be most grateful if you could address this issue in Court before proceedings begin on Mon 18 April 2022.

Application by the media to receive daily transcripts of Depp v Heard trial proceedings

1. My name is Nick Wallis. I am an experienced UK-based freelance journalist covering Depp v Heard. My visa was sponsored by 5 News, a Channel 5 news programme broadcast in the UK. I also run a crowdfunded website called Reporting Depp v Heard.
2. In July 2020, I covered the Depp v NGN trial at the High Court in London, again for 5 News. I also live-tweeted proceedings to many millions of people in the USA and around the world. This element of my work was crowdfunded. The Depp v NGN trial was not televised and travel restrictions were in place, which meant that no US-based journalists could attend. Hence the interest in my work.
3. My coverage of both Depp v NGN and Depp v Heard is intended to be objective and impartial and it will remain so.
4. On 10 July 2020, as part of my journalistic activity covering the UK trial, I successfully applied to the High Court to be given daily transcripts of proceedings. The reason was to better aid my reporting and better aid the public understanding of the administration of justice.

Although I made the application to the Court, once it had been raised by the judge at the beginning of that day's proceedings, the parties indicated their willingness to supply me with daily transcripts at no cost, and no Order was required.

4/18 PER JUDGE AGENARTE. CONTACT Plaintiff Depp INFORMED MR WALLIS

5. From that day the parties supplied me with transcripts for the duration of the trial (including those which had already been produced). These were not the final archived transcripts, but the "unperfected" transcripts as produced at the end of the day. As well as using the transcripts to aid my journalism, I published them on my website. I made clear they were unperfected versions when I published them.

6. I would be most grateful if Your Honor would consent to:

a) making an Order to the parties to supply me (and any other journalist who requests them) with daily transcripts via their representatives from the beginning of this trial to its conclusion.

OR

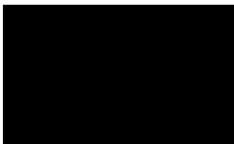
b) Order that I may pay a reasonable sum for and receive the daily unperfected transcripts from the Court reporting organisation which produces them, as soon as they are made available to the parties.

7. As Your Honor is well aware, a live, uninterrupted television feed of Depp v Heard proceedings is being broadcast around the world - so everything in the transcripts is already in the public domain anyway.

8. To give further context to my request, a transcript of Friday's hearing concerning the actions of Eve Barlow made its way into the public domain on Saturday, published on a respected but partisan website. This is the first transcript (to my knowledge) of these proceedings which has been made public. It could suggest transcripts are going to appear, or be leaked, selectively. This, I feel, is unsatisfactory in such an important case.

9. I will be in Court on Monday morning if you would like me to make any further submissions to support my application.

Respectfully submitted,



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