

1 **DECLARATION OF ISAAC BARUCH**

2 I, Isaac Baruch, hereby declare as follows:

3 1. I am over the age of 18 and not a party to this action. The facts set forth in this
4 Declaration are personally known to me and I have firsthand knowledge of them. If called as a
5 witness, I would competently testify to these facts.

6 2. I live in a condominium unit owned by Respondent, John Christopher Depp II
7 (hereinafter "Johnny") at 849 S. Broadway in Los Angeles. I have lived in this unit for three years
8 and I have known Johnny for 36 years.

9 3. On Sunday, May 22, 2016, I ran into Petitioner, Amber Laura Depp (hereinafter
10 "Amber") in the shared hallway outside of my unit and another unit Johnny owns. Amber was
11 accompanied by four people: our neighbor Joshua Drew, a person I did not recognize, and two
12 locksmiths. Amber told me that Johnny had hit her and thrown a telephone at her. She then angled
13 her head and neck toward me so that I could look at her face. The hallway was filled with daylight
14 and I could see her face clearly. Amber did not appear to be wearing any makeup and I told her that I
15 did not see anything on her face. There were no visible marks, swelling, or redness. I joked that her
16 beauty must have outshined everything from one side of her face to the other. Amber smiled and
17 blushed and then began to laugh.

18 4. On Monday, May 23, 2016 or Tuesday, May 24, 2016, Amber knocked on my door
19 and asked if I would take her key to let the cleaning woman in later that day. I again had an
20 opportunity to take a good look at her face. The light was bright. She stood approximately two feet
21 in front of me in the doorway to my unit. I saw no marks, bruises, or scratches on her face.

22 5. I saw Amber again one or two days later and still saw no bruising or marks on her
23 face. I ran into her in the hallway as I was going downstairs to get coffee at the café next to our
24 building. She was with her sister and girlfriends, and I remember that they laughed because I had a
25 cold and would not let her sister near me when she tried to greet me. I saw them all again in the
26 lobby when I was returning from the café and they were leaving the building. Later that day, I saw
27 Amber again in the parking lot of our building on my way home after grocery shopping. I had a
28 good look at her face each time and did not see any marks or injuries.

1 6. On Friday, June 3, 2016, Amber knocked on my door and invited me over for dinner.
2 During the week prior, I had become aware from numerous media reports that Amber had filed for
3 divorce from Johnny and that she was accusing him of abusing her. Under those circumstances, I
4 was not comfortable having dinner with Amber and I declined her invitation. Amber then told me
5 that she did not want anything from Johnny and that it was the lawyers who were doing all of this. I
6 believe she was referring to the court proceedings and the media frenzy surrounding them.

7 7. In the many years I have known Johnny, I have never once seen him commit an act of
8 physical violence.

9
10 I declare under penalty of perjury under the laws of the State of California that the foregoing
11 is true and correct.

12 Executed this ___ day of June, 2016, at Los Angeles, California.



ISAAC BARUCH

JANUARY 21ST, 2019

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