

**BROWNE GEORGE ROSS** LLP  
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Eric M. George  
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File No. 7649-002

October 12, 2018

**Via Certified U.S. Mail And Email**

John Christopher Depp  
c/o Edward White, C.P.A.  
EDWARD WHITE & CO., LLP  
21700 Oxnard Street, Ste. 400  
Woodland Hills, CA 91367  
[ewhite@ewccpas.com](mailto:ewhite@ewccpas.com)

Re: Arbitration Demand

Dear Mr. White:

My client Amber Heard has initiated arbitration proceedings against your client Johnny Depp. This letter constitutes formal notice of these proceedings pursuant to Paragraph 21.19 of their divorce judgment. Ms. Heard's arbitration demand is attached to this letter.

Please be advised that we will regard any further public statements that Mr. Depp or his agents may make about Ms. Heard as grounds for the imposition of additional compensatory and punitive damages.

Sincerely,



Eric M. George

Enc.

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PLT/ Def: 219  
Date: 04/11/2022  
Judge: ID ONLY  
Case: CL-2019-0002911

PLAINTIFF'S TRIAL EXHIBIT 0219\_0001

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6 Attorneys for Claimant Amber Heard

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SIGNATURE RESOLUTION

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11 AMBER HEARD,

12 Claimant,

13 vs.

14 JOHN CHRISTOPHER DEPP II,

15 Respondent.

Case No.

The Hon. Louis M. Meisinger (Ret.)

**ARBITRATION DEMAND**

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COMPLAINT

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**ARBITRATION DEMAND**

COMES NOW, Claimant Amber Heard, an individual (“Heard” or “Claimant”), by and through her counsel of record Eric M. George and Jeffrey C. Berman of BROWNE GEORGE ROSS LLP, and hereby submits her arbitration demand against Respondent John Christopher Depp II, (“Depp” or “Respondent”), an individual, and alleges the following:

**I. PARTIES**

- 1. Claimant Heard is an individual, who is, and at all times relevant hereto was, a resident of Los Angeles, California.
- 2. Claimant is informed, believes, and thereupon alleges that Respondent Depp, an individual, is, and at all times relevant hereto was, a resident of Los Angeles, California.

**II. JURISDICTION AND VENUE**

3. The Hon. Louis M. Meisinger (Ret.) has jurisdiction over Claimant’s claims pursuant to paragraph 19 of the Parties’ Stipulated Judgment of Dissolution of Marriage (the “Judgment”), which was executed by Claimant on December 9, 2016 and by Respondent on December 13, 2016, and which states, *inter alia*, that Judge Meisinger is empowered “to resolve all disputes between the parties arising out of or relating to the Judgment.”

4. The Judgment specifically regulates communications by each party about the other, prohibiting the Parties and their agents from, *inter alia*, discussing, publishing or posting “any information pertaining to the parties’ premarital relationship [or] marriage.” It further states that each party “shall refrain from making or causing to be made, and agrees not to make or cause to be made, any derogatory, disparaging, critical or accusatory statements . . . concerning the other party.”

**III. GENERAL ALLEGATIONS**

- 5. Claimant Amber Heard is a successful actress with nearly 50 television and film credits.
- 6. Respondent John Christopher Depp II, known professionally as Johnny Depp, is a successful actor with approximately 90 television and film credits.
- 7. Heard and Depp began dating in approximately June 2012, and they married on February 3, 2015. On May 23, 2016, Heard filed for divorce, and the Judgment finalizing their

1 divorce was entered by the Superior Court of California, County of Los Angeles on January 13,  
2 2017.

3 a. **Depp And His Agent's Defamatory Statements**

4 8. On or about October 2, 2018, GQ UK published a story online entitled, "Johnny  
5 Depp will not be buried" (the "GQ Article"). The GQ Article is also the cover story for the  
6 November 2018 print edition of GQ UK. The cover of the print edition states: "An outlaw talks  
7 (And talks and talks . . . ) The divorce. The violence. The excess. The vengeance."

8 9. The GQ Article, which was written by Jonathan Heaf, contains a number of direct  
9 quotes attributed to Depp, including:

- 10 - Referring to the allegations that Depp physically abused Heard, "To harm someone  
11 you love? As a kind of bully? No, it didn't, it couldn't even sound to me."  
12 - Referring to Heard attending a party the day after Depp physically abused Heard,  
13 leaving a bruise on her face: "[Heard] was at a party the next day. Her eye wasn't  
14 closed. She had her hair over her eye, but you could see the eye wasn't shut. Twenty-  
15 five feet away from her, how the fuck am I going to hit her? Which, by the way, is  
16 the last thing I would've done."

17 10. Depp knew that all of these statements, as well as several other statements he made  
18 in the GQ Article concerning Heard, were false and defamatory when he made them.

19 11. On October 5, 2018, The Hollywood Reporter published an article online entitled,  
20 "Johnny Depp's Legal Team Prepares for Court Hearing About Amber Heard Abuse Claims" (the  
21 "THR Article").

22 12. The THR Article, which was written by Katie Kilkenny, contains a statement from  
23 Adam Waldman ("Waldman"), an attorney representing Depp, in which Waldman states, *inter alia*:

- 24 - "[W]e will submit overwhelming evidence to a U.K. court next month that Ms. Heard  
25 repeatedly violently attacked and severely injured Mr. Depp, and then faked abuse  
26 allegations against him."  
27 - "Ms. Heard became in the process an imposter in the #MeToo movement who abused  
28 the trust and experiences of real survivors for her own reputational gain."





1 WHEREFORE, Claimant prays for judgment against Respondents as follows:  
2 1. For an award to Claimant of actual compensatory damages in an amount to be  
3 determined by the trier of fact;  
4 2. For an award to Claimant of punitive damages for Respondent's intentional,  
5 malicious, and oppressive conduct, in an amount to be determined by the trier of fact;  
6 3. For pre- and post-judgment interest as permitted by applicable law;  
7 4. For any such other and further relief as the trier of fact determines to be just and  
8 proper.

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10 DATED: October 11, 2018

BROWNE GEORGE ROSS LLP

Eric M. George  
Jeffrey C. Berman

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14 By: 

Eric M. George  
Attorneys for Claimant Amber Heard

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**PROOF OF SERVICE**

**Amber Heard v. John Christopher Depp, II  
Signature Resolution, Case No. unassigned**

**STATE OF CALIFORNIA, COUNTY OF LOS ANGELES**

At the time of service, I was over 18 years of age and not a party to this action. I am employed in the County of Los Angeles, State of California. My business address is 2121 Avenue of the Stars, Suite 2800, Los Angeles, CA 90067.

On October 12, 2018, I served true copies of the following document(s) described as **ARBITRATION DEMAND** on the interested parties in this action as follows:

**SEE ATTACHED SERVICE LIST**

**BY CERTIFIED MAIL – RETURN RECEIPT REQUESTED:** I enclosed the document(s) in a sealed envelope or package addressed to the persons at the addresses listed in the Service List and placed the envelope for collection and mailing via Certified Mail, Return Receipt Requested, following our ordinary business practices. I am readily familiar with the practice of Browne George Ross LLP for collecting and processing correspondence for mailing. On the same day that the correspondence is placed for collection and mailing, it is deposited in the ordinary course of business with the United States Postal Service, in a sealed envelope with postage fully prepaid. I am a resident or employed in the county where the mailing occurred. The envelope was placed in the mail at Los Angeles, California.

**BY E-MAIL OR ELECTRONIC TRANSMISSION:** On October 12, 2018, I caused a copy of the document(s) to be sent from e-mail address cbonilla@bgrfirm.com to the persons at the e-mail addresses listed in the Service List. I did not receive, within a reasonable time after the transmission, any electronic message or other indication that the transmission was unsuccessful.

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

Executed on October 12, 2018, at Los Angeles, California.

\_\_\_\_\_  
Claudia Bonilla