

VIRGINIA:

IN THE CIRCUIT COURT OF FAIRFAX COUNTY, VIRGINIA

JOHN C. DEPP, II

Plaintiff,

v.

AMBER LAURA HEARD,

Defendant.

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Civil Action No.: CL-2019-0002911

PLAINTIFF'S DESIGNATION/IDENTIFICATION OF EXPERT WITNESSES

Plaintiff John C. Depp, II, by and through his undersigned counsel, pursuant to Rule 4:1(b)(4)(A)(i) of the Rules of the Supreme Court of Virginia, and the Court's Scheduling Order, dated June 27, 2019, and in response to Interrogatory No. 15 in Ms. Heard's First Set of Interrogatories dated October 7, 2019, hereby designates and identifies his expert witnesses.

Given the ongoing state of discovery—in particular, the continuing document productions from the parties and non-parties and the fact that depositions of certain key parties and witnesses, specifically Ms. Heard, have yet to occur—Plaintiff reserves the right to supplement this Expert Witness Designation, to include (1) identifying additional or different areas of expected testimony for the designated witnesses, (2) identifying additional or different bases for the expected testimony of the designated witnesses, and/or (3) designating additional or different expert witnesses.

Retained Experts

1. **Richard Marks, Entertainment Industry Expert, Richard Marks & Associates, 10573 W. Pico Blvd., Suite 221, Los Angeles, California 90064.** Mr. Marks has had a long career as an executive and business lawyer in the entertainment industry. Mr. Marks

Designation based on additional facts Plaintiff learns during discovery and/or his ongoing investigation of this matter. In particular, as of the date of this Expert Designation, Ms. Heard has yet to grant access to the original devices, including mobile devices and computers (including laptops and iPads), as well as access to the operating system drives and cloud backups of these original devices for purposes of performing a physical extraction and direct examination of all relevant data from the original devices as requested in Mr. Depp's Seventh Set of Requests for Production, dated February 12, 2021, to Ms. Heard.

Mr. Neumeister's CV is attached hereto as **Exhibit D**. He is being compensated for his work at the rate of \$575 per hour; none of his compensation is contingent on the opinions he renders or the outcome of the litigation.

5. **Shannon J. Curry, PsyD, Clinical Psychologist, Curry Psychology Group, 200 Newport Center Drive, Suite 204, Newport Beach, California 92660.** Dr. Curry is a clinical psychologist with extensive experience and clinical and research expertise in individual and community trauma, forensic psychology, and relationships/the Gottman method of couples' therapy. Currently, Dr. Curry is the owner and director of the Curry Psychology Group, a multispecialty mental health center in Newport Beach, California. Dr. Curry has nine years of experience as a licensed clinical psychologist, providing direct therapy and assessment services and supervising masters- and doctoral-level clinicians. Prior to becoming a clinical psychologist, Dr. Curry worked for seven years as a therapist. She is experienced in treating adults, couples, adolescents, children, and families across a diverse range of settings including community counseling centers, forensic psychiatric hospitals, correctional programs, military facilities, and rural clinics both in the U.S. and abroad (Ayacucho, Peru and La Paz, Mexico). In addition to her clinical work, Dr. Curry is on the board for the University of California Irvine Center for

Unconventional Security Affairs (“CUSA”) and is involved in continued research on issues of poverty, warfare, violence, environmental sustainability, and complex disaster.

Dr. Curry received her Bachelor of Arts in Psychology and Social Behavior with high honors from the University of California, Irvine; a Master of Arts in Psychology from Pepperdine University; a Post-Doctoral Master of Science in Clinical Psychopharmacology from Alliant University (for psychologist prescriptive authority in certain states and federal jurisdictions); and a doctorate in Clinical Psychology from Pepperdine University with research honors. Dr. Curry completed a year-long doctoral internship at Tripler Army Medical Hospital in Honolulu, Hawaii, an American Psychological Association (“APA”)-Accredited training site, where she obtained intensive experience in psychological assessment and the treatment of post-traumatic stress disorder (“PTSD”). She then completed a two-year post-doctoral residency at Hawaii State Hospital, a forensic psychiatric hospital where she specialized in trauma and forensic psychology and obtained Certification as a Forensic Evaluator for the Hawaii State Department of Courts and Corrections.

Dr. Curry will testify concerning Ms. Heard’s behavior in the context of her relationship with Mr. Depp, including Ms. Heard’s abuse of Mr. Depp. Specifically, Dr. Curry is expected to draw upon her experience and expertise as a clinical and forensic psychologist as well as her review of current and relevant peer-reviewed scientific literature to testify as to the following:

- a. Ms. Heard exhibits patterns of behavior that are consistent with co-occurring Cluster B Personality Disorder traits, especially Borderline Personality Disorder (“BPD”);
- b. Ms. Heard repeatedly and characterologically perpetrated severe physical and psychological Intimate Partner Violence (“IPV”) toward Mr. Depp over the course of their relationship; and

- c. Ms. Heard exhibits patterns of behavior that suggest her allegations of abuse against Mr. Depp are false.

Dr. Curry's opinions will be based on a review of documentary evidence and deposition and trial testimony, including the deposition testimony of Ms. Heard in the 2016 divorce proceeding between Ms. Heard and Mr. Depp and the deposition testimony of Mr. Depp in this case, the documents, video and audio recordings, photographs, and text messages produced by Mr. Depp and Ms. Heard including documents submitted by Ms. Heard to obtain a temporary restraining order against Mr. Depp in 2016, the arrest records of Ms. Heard for domestic abuse against Ms. Tasya van Ree, and documents relating to Ms. Heard and her involvement, including any donations, to the American Civil Liberties Union, the documents produced by the Children's Hospital of Los Angeles, and the medical records produced by Dr. David Kipper, Dr. Connell Cowan, and Dr. Alan Blaustein. Dr. Curry's opinions will also be based on current and relevant peer-reviewed scientific literature. A full list of references that Dr. Curry has relied on thus far to form her opinion is attached hereto as **Exhibit E**.

Dr. Curry may also testify as to any fact or opinion rendered or attributed to another witness or party as identified by other parties' witnesses. Plaintiff reserves the right to designate or substitute other witnesses of the same disciplines to testify as to the facts and opinions described herein. Plaintiff further reserves the right to supplement this Expert Witness Designation based on additional facts Plaintiff learns during discovery and/or his ongoing investigation of this matter. In particular, as of the date of this Expert Designation, the following depositions have yet to occur: Dr. David Kipper, Ms. Debbie Lloyd, Ms. Erin Falati, Ms. Heard's treating psychologists and physicians, Ms. Heard, and Ms. Tasya van Ree.

Depp's favor on his career going forward. In so doing, Ms. Baum may rely on her expertise in the entertainment industry and her experience as a publicist in that industry.

5. **Dr. David Kipper, MD, 153 South Lasky Drive, Beverly Hills, California 90210.** Dr. Kipper has been practicing internal medicine for decades and has served as Mr. Depp's treating physician for more than six years. Dr. Kipper also served as Ms. Heard's treating physician while Ms. Heard was in a relationship with Mr. Depp. Dr. Kipper is expected to testify as to the pharmacological effects of the medications prescribed on Mr. Depp, as well as medical opinions reached during the course of Mr. Depp and Ms. Heard's treatment. In so doing, Dr. Kipper may rely on his expertise and experience as a medical doctor practicing internal medicine.

Respectfully submitted,



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