

1 Laura A. Wasser, Esq. (SBN 173740)  
Samantha Klein, Esq. (SBN 222414)  
2 Lisa P. Sutton, Esq. (SBN 276183)  
WASSER, COOPERMAN & MANDLES, P.C.

3 [REDACTED]  
Los Angeles, California 90067-3110

4 Telephone No.: [REDACTED]  
5 Facsimile No.: [REDACTED]

6 Attorneys for Respondent

**FILED**  
Superior Court of California  
County of Los Angeles

AUG 08 2016

Sherril R. Carter, Executive Officer/Clerk  
By Daniel Osorio, Deputy  
Daniel Osorio

7  
8  
9 SUPERIOR COURT OF THE STATE OF CALIFORNIA  
10 FOR THE COUNTY OF LOS ANGELES

11  
12 In re the Marriage of ) CASE NO. BD641052  
13 Petitioner: AMBER LAURA DEPP ) [Assigned to Dept. 6,  
14 and ) Hon. Carl H. Moor]  
15 Respondent: JOHN CHRISTOPHER DEPP ) **RESPONDENT'S WITNESS LIST**  
II (AKA JOHNNY DEPP) ) Date: August 15 & August 16, 2016  
16 ) Dept: 6  
17 ) Time: 8:30 a.m.

18 Respondent, JOHN CHRISTOPHER DEPP II (AKA JOHNNY DEPP) designates the  
19 following witnesses he expects to call on the hearing on Petitioner, AMBER LAURA DEPP's,  
20 application for domestic violence restraining orders.

- 21 1. Amber Laura Depp. Respondent intends to question Ms. Depp about her allegations  
22 of domestic abuse. Respondent estimates that Ms. Depp's direct examination will take  
23 approximately four (4) hours.
- 24 2. Police Officer Hadden. Respondent intends to question Officer Hadden regarding her  
25 observations of Petitioner after the alleged incident on May 21, 2016. Respondent estimates that  
26 Officer Hadden's direct examination will take approximately fifteen (15) minutes.
- 27 3. Police Officer Saenz. Respondent intends to question Officer Saenz regarding his  
28 observations of Petitioner after the alleged incident on May 21, 2016. Respondent estimates that

1 Officer Saenz's direct examination will take approximately fifteen (15) minutes.

2 4. Trinity Esparza. Respondent intends to question Ms. Esparza regarding her  
3 observations of Petitioner after the alleged incident on May 21, 2016. Respondent estimates that Ms.  
4 Esparza's direct examination will take approximately fifteen (15) minutes.

5 5. Alex Romero. Respondent intends to question Mr. Romero regarding his  
6 observations of Petitioner after the alleged incident on May 21, 2016. Respondent estimates that Mr.  
7 Romero's direct examination will take approximately fifteen (15) minutes.

8 6. Gaylynn Sumerlin. Respondent intends to question Ms. Sumerlin regarding her  
9 observations of Petitioner after the alleged incident on May 21, 2016. Respondent estimates that Ms.  
10 Sumerlin's direct examination will take approximately fifteen (15) minutes.

11 7. Michael Weiner. Respondent intends to question Mr. Weiner regarding his  
12 observations of Petitioner after the alleged incident on May 21, 2016. Respondent estimates that Mr.  
13 Weiner's direct examination will take approximately fifteen (15) minutes.

14 8. Cornelius Harrell. Respondent intends to question Mr. Harrell regarding his  
15 observations of Petitioner after the alleged incident on May 21, 2016. Respondent estimates that Mr.  
16 Harrell's direct examination will take approximately fifteen (15) minutes.

17 9. Raquel Pennington. Respondent intends to question Ms. Pennington with respect to  
18 her Declaration of May 26, 2016 and the events she purports to have witnessed on May 21, 2016  
19 between Petitioner and Respondent. Respondent estimates that Ms. Pennington's direct examination  
20 will take approximately thirty (30) minutes.

21 10. Kevin Murphy. Mr. Murphy will testify to previous conversations with Petitioner  
22 regarding incidents on April 21/22, 2016 and May 21, 2016. Respondent estimates that Mr.  
23 Murphy's direct examination will take approximately fifteen (15) minutes.

24 11. Hilda Vargas. Ms. Vargas will testify to a discovery she made on April 22, 2016 in  
25 Petitioner and Respondent's home. Respondent estimates that Ms. Vargas's direct examination will  
26 take approximately fifteen (15) minutes.

27 12. Sean Bett. Mr. Bett will testify to events he witnessed on May 21, 2016 between  
Petitioner and Respondent. Respondent estimates that Mr. Bett's direct examination will take

1 approximately fifteen (15) minutes.

2 13. Jerry Judge. Mr. Judge will testify to events he witnessed on May 21, 2016 between  
3 Petitioner and Respondent. Respondent estimates that Mr. Judge's direct examination will take  
4 approximately fifteen (15) minutes.

5 14. Travis McGivern. Mr. McGivern will testify to his observations of Petitioner's prior  
6 behavior toward Respondent. Respondent estimates that Mr. McGivern's direct examination will  
7 take approximately fifteen (15) minutes.

8 15. Zeev Haskal. Mr. Haskal will testify to his receipt of records regarding Petitioner's  
9 previous arrest for assault. Respondent estimates that Mr. Haskal's direct examination will take  
10 approximately fifteen (15) minutes.

11 16. Bruce Witkin. Mr. Witkin will testify to his prior observations and communications  
12 with Petitioner and Respondent. Respondent estimates that Mr. Witkin's direct examination will  
13 take approximately fifteen (15) minutes.

14 17. Starling Jenkins. Mr. Jenkins will testify to his prior observations and  
15 communications with Petitioner and Respondent. Respondent estimates that Mr. Jenkins's direct  
16 examination will take approximately fifteen (15) minutes.

17 18. Nathan Holmes. Mr. Holmes will testify to prior communications with Petitioner.  
18 Respondent estimates that Mr. Holmes's direct examination will take approximately fifteen (15)  
19 minutes.

20 19. Isaac Baruch. Mr. Baruch will testify to his observations of Petitioner in the week  
21 following the alleged incident on May 21, 2016 which is the subject of this hearing. Respondent  
22 estimates that Mr. Baruch's direct examination will take approximately fifteen (15) minutes.

23 20. Edward White. Mr. White will testify to his observations of Respondent on the  
24 evening of April 21, 2016 which is the subject of some of Petitioner's complaints in her declaration  
25 of May 26, 2016. Respondent estimates that Mr. White's direct examination will take approximately  
26 fifteen (15) minutes.

27 21. Jodi D. Gotlieb. Respondent intends to question Ms. Gotlieb regarding her  
observations of Petitioner after the alleged incident on May 21, 2016. Respondent estimates that Ms.

1 Gottlieb's direct examination will take approximately fifteen (15) minutes.

2 22. Joshua Drew. Respondent intends to question Mr. Drew regarding his observations on  
3 May 21, 2016. Respondent estimates that Mr. Drew's direct examination will take approximately  
4 fifteen (15) minutes.

5 23. Vanessa Paradis. Respondent intends to question Ms. Paradis regarding her  
6 relationship with Respondent. Respondent estimates that Ms. Paradis's direct examination will take  
7 approximately fifteen (15) minutes.

8 Respondent reserves the right to call any additional witnesses for the purposes of  
9 impeachment and/or rebuttal. Respondent reserves the right to call any additional witnesses  
10 identified by Petitioner on her witness list.

11  
12 DATED: August 8, 2016

WASSER, COOPERMAN & MANDLES, P.C.

13  
14 By: 

15 LAURA A. WASSER  
16 SAMANTHA KLEIN  
17 Attorneys for Respondent,  
18 JOHN CHRISTOPHER DEPP II  
19  
20  
21  
22  
23  
24  
25  
26  
27

1 Laura A. Wasser, Esq. (SBN 173740)  
Samantha Klein, Esq. (SBN 222414)  
2 Lisa P. Sutton, Esq. (SBN 276183)  
WASSER, COOPERMAN & MANDLES, P.C.  
3 [REDACTED]  
Los Angeles, California 90067-3110  
4 Telephone No.: [REDACTED]  
5 Facsimile No.: [REDACTED]

6 Attorneys for Respondent

**FILED**  
Superior Court of California  
County of Los Angeles

**AUG 08 2016**

Sherrill Carter, Executive Officer/Clerk  
By Daniel Osorio, Deputy

7  
8  
9 SUPERIOR COURT OF THE STATE OF CALIFORNIA  
10 FOR THE COUNTY OF LOS ANGELES  
11

12 In re the Marriage of ) CASE NO. BD641052  
13 Petitioner: AMBER LAURA DEPP ) [Assigned to Dept. 6, Hon. Carl H. Moor]  
14 ) **RESPONDENT'S PROPOSED**  
15 and ) **LIST OF EXHIBITS**  
16 ) Date: August 15 & 16, 2016  
17 Respondent: JOHN CHRISTOPHER DEPP )  
18 II (AKA JOHNNY DEPP) )  
19 )

20 Petitioner, AMBER LAURA DEPP, has refused to submit to her properly noticed and court  
21 ordered deposition, and failed to produce any responsive documents to the Notice of Deposition.  
22 Many of Petitioner's alleged percipient witnesses have also repeatedly claimed unavailability or  
23 failed to produce responsive documents to deposition subpoenas. Several depositions must still be  
24 scheduled. Discovery is ongoing. For the reasons set forth above, Respondent, JOHN  
25 CHRISTOPHER DEPP II (AKA JOHNNY DEPP), reserves the right to amend this Exhibit List as  
26 additional information and/or evidence becomes available in this action including, but not limited to,  
27 evidence related to the depositions not taken as a consequence of Petitioner's conduct. Respondent,  
28 therefore submits the following proposed exhibits.

1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27

NO.	EXHIBIT DESCRIPTION	ID.	ADMIT	REJECT
501.	Los Angeles Police Department - Incident Recall - May 21, 2016			
502.	Los Angeles Police Department - Incident Recall - May 22, 2016			
503.	Los Angeles Police Department - Audio Disk 1 - May 21, 2016			
504.	Los Angeles Police Department - Audio Disk 2 - Track 1 - May 21, 2016			
505.	Los Angeles Police Department - Audio Disk 2 - Track 2 - May 21, 2016			
506.	Los Angeles Police Department July 12, 2016 Declaration of Custodian of Records			
507.	Port of Seattle Police Department Sept. 14, 2009 - Arrest and Prosecution Records of Petitioner in State of Washington v. Amber Van Ree			
508.	April 18, 2016 Order - Petitioner - Australia Criminal Case			
509.	April 22, 2016 Photographs - Petitioner and Respondent's Bed <i>For privacy reasons, this exhibit is being served on Petitioner's counsel and will be supplied to the Court at the time of hearing.</i>			
510.	May 21, 2016 Photograph - Kevin Murphy's telephone call log			
511.	Photographs - Respondent - December 15, 2015			

1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27

NO.	EXHIBIT DESCRIPTION	ID.	ADMIT	REJECT
512.	May 24, 2016 Letter - Samantha Spector to Jacob Bloom			
513.	April 23 - June 2, 2016 Text Messages - Raquel Pennington and IO Tillett Wright			
514.	May 24, 2016 Text Message - Petitioner and Jerry Judge			
515.	May 12, 2016 Text Messages - Petitioner and Kevin Murphy			
516.	May 24, 2016 Text Messages - Petitioner and Nathan Holmes			
517.	April 21 - May 26, 2016 Text Messages - Petitioner and Respondent			
518.	Text Messages - Raquel Pennington and Elizabeth Marz Various dates - 171 pages			
519.	June 9, 2016 Text Messages - Raquelle Pennington and Elizabeth Marz			
520.	May 27 - 29, 2016 Text Messages - Raquelle Pennington and Elizabeth Marz			
521.	May 30 - June 5, 2016 Text Messages -Raquelle Pennington and Elizabeth Marz			
522.	Text Messages -Raquelle Pennington and Elizabeth Marz Various dates - 2 pages			
523.	Text Messages -Raquelle Pennington and Elizabeth Marz - Various dates - 4 pages			

1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27

NO.	EXHIBIT DESCRIPTION	ID.	ADMIT	REJECT
524.	Text Messages -Raquelle Pennington and Elizabeth Marz Various dates - 5 pages			
525.	May 3, 2015 and May 11, 2015 Text Messages -Raquelle Pennington and Elizabeth Marz			
526.	May 21, 2016 Text Messages and Phone Log- Sean Bett and Kevin Murphy			
527.	May 27, 2016 Declaration of Racquel Rose Pennington			
528.	June 16, 2016 Media TMZ.COM - Costume Fitting			
529.	April 22, 2016 Instagram Video			
530.				
531.				
532.				
533.				
534.				
535.				
536.				
537.				
538.				
539.				
540.				




1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27

NO.	EXHIBIT DESCRIPTION	ID.	ADMIT	REJECT
541.				
542.				
543.				
544.				
545.				
546.				
547.				
548.				
549.				
550.				

Respondent reserves the right to use exhibits not listed herein for purposes of impeachment and rebuttal, and as amended as additional discovery is obtained.

DATED: August 8, 2016

WASSER, COOPERMAN & MANDLES, P.C.

By:   
\_\_\_\_\_  
LAURA A. WASSER  
SAMANTHA KLEIN  
Attorneys for Respondent,  
JOHN CHRISTOPHER DEPP II