

Claim No.: QB-2018-006323

**IN THE HIGH COURT OF JUSTICE
QUEEN'S BENCH DIVISION
MEDIA AND COMMUNICATIONS LIST**

B E T W E E N

JOHN CHRISTOPHER DEPP II

Claimant

and

**(1) NEWS GROUP NEWSPAPERS LTD
(2) DAN WOOTTON**

Defendants

SECOND WITNESS STATEMENT OF BEN KING

I, **BEN KING** of Riverwalk, Apartment W308, 161 Millbank, London SW1P 4FA will say as follows:

1. In my first statement I set out the two time periods when I worked for the Claimant and Ms Heard, namely in London in October 2014 and in Australia in 2015. I did also work for Mr Depp and Ms Heard in Vancouver in the Spring of 2016.
2. I am providing this second statement as I have been asked to provide information about the consumption of alcohol by Mr Depp and Ms Heard as I witnessed or experienced it, as well as their relationship, following on from questions I understand were asked of Mr Depp at this trial.
3. I confirm that save where otherwise appears the facts stated in this witness statement are within my own knowledge and that those facts are true to the best of my knowledge and belief. Where facts are not within my own knowledge, I confirm that they are true to the best of my information and belief and the source of that information is set out.

4. I make this witness statement in support of the Claimant's claim in these proceedings.
5. I do not know the full details of the Claimant's claims against the Defendants in these proceedings.
6. As I said in my first statement, I had a good relationship with Ms Heard. On my first meeting with Mr Depp and Ms Heard when they arrived in London, they, individually, seemed like decent people, and a pleasant couple.
7. I managed the property they had rented during their stay in London. Although I did not live at the house in London, I was there daily for most of the day, except for weekends when the two of them were living there.
8. When I was being interviewed for the job, I was informed that Mr Depp was teetotal, having been a drinker. This was just part of the information I was provided with to do my job properly, in advance of the principals arriving.
9. I vividly recall that when they arrived at the house, they brought with them a relatively large number of cases of wine. I was quite surprised by this given what I had been told about the fact that Mr Depp was teetotal.
10. I can say that during their stay in London, I did not see Mr Depp drink. It was Ms Heard who was drinking the wine. I believe she would regularly drink at least one or two bottles a night. I made a tally of the bottles of wine left on the counter or in the bins when I arrived each morning. I was usually the first one there. I would often see Ms Heard drinking wine. She would sometimes offer a glass to me. Almost every day wine was opened for her consumption. Often, she left a red wine glass on her bedside table. I know some couples where one is a former drinker and

the other one still has a drink, but even so I was surprised by Ms Heard's consumption around Mr Depp.

11. During their stay in London, I also heard them argue a few times. On one occasion I could hear them arguing from upstairs when I was going about my duties downstairs. On a number of occasions, mostly in Australia, Mr Depp left notes downstairs before he went to work, saying things like 'let's not do this again' and 'I love you'. They were usually left open on the kitchen/dining table, and he would sometimes leave notes for me too if there were items he needed, or small thank you notes.
12. Of what I heard of their arguments, they could start from very banal beginnings. On one occasion in London, I recall Ms Heard complained that Mr Depp had removed his hand from hers, and she complained along the lines of "maybe you don't love me" (because you took your hand away). The argument then carried on and escalated seriously. The way they argued could make them seem like school children. In hindsight, during the month in London, and thereafter during my time in Australia, I saw Ms Heard as the antagonist. Mr Depp seemed keen to walk out of, or away from, arguments. It appeared it was Ms Heard who would want to continue them and pursue him to do so. I was aware on some occasions that he would walk out and then slam the door shut behind him.
13. I want to make clear that I did not see any violence at any time. I do not want to accuse Ms Heard of anything but this was what I saw of the pattern of their arguments. I had a good relationship with both her and Mr Depp individually.
14. During their stay in London, some of Ms Heard's friends from the States came to visit. They stayed in the house as Mr Depp's and Ms Heard's guests. They seemed to have a good time, partying, but it was only on that one occasion that they stayed for a large dinner.

15. Towards the end of Mr Depp's and Mr Heard's stay in London, there was some damage to the bedroom. It was a red wine spill, which looked like it was the result of wine being thrown. It was a smashed glass, and a smashed bottle beside the bed, with wine on the fabric wallpaper and down the side of the bed. I had to get specialist cleaners in to clean the fabric wallpaper and carpet.
16. Ms Heard had brought her two small dogs with her to London, and there was a fair amount of dog urine on the carpets that also had to be cleaned.
17. I have already mentioned in my first statement that during the stay in Australia in March 2015, Ms Heard seemed to harangue Mr Depp during the arguments, which seemed worse than they had been in London.
18. I arrived at the house on 8 March 2015, shortly after Mr Depp had been driven away. I realised afterwards that I had passed him on the driveway in my car, as he was being driven in the opposite direction.
19. As I said in my first statement, when I got to the house that day, there was a considerable amount of damage, particularly to the bar area on the lower ground floor.
20. I was in charge of arranging the clean-up and replacing things or getting damage repaired. The immediate physical damage was tidied up, such as broken glass, paint, blood, liquid spillages and broken china where a cup had struck the TV. I also cleaned the graffiti from the mirrors. I was there for several hours. I then went to pick up my bag and my passport once it was agreed that I would fly back to LA with Ms Heard. I left knowing that I would have to come back and get the house back in shape. I came back around a week later to deal with the larger clean up work, such as organising the floors to be sanded, the curtains cleaned, paintwork and plasterwork, and chipped stone on the countertop in the bar area, and on the staircase down to the bar, where a flower vase had been launched from the kitchen area above.

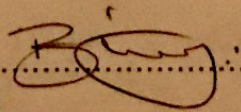
21. I recently looked for photographs of the damage and I exhibit at BKXX a photograph which I took that afternoon on 8 March 2015 of the bar area. It shows the countertop which was damaged and which I had to arrange to get repaired. On the countertop is the phone. To the best of my recollection, that handset was not damaged, and I did not see any phones which had been broken. I did not arrange for any phones in the house to be replaced. I do not recall damage to a wall where a wall-mounted phone had been forcibly removed, or any sign of a phone being ripped from a wall. I do not recall a shattered phone or handset. All of the phones in the house were Bakelite or plastic, standard phones.
22. A lot of the damage was paint and blood around the house. One of the ground floor rooms had been set up as a painting studio, and the paint appeared to have come from there. The carpets and rugs in the house required professional cleaning and I used a local company which were recommended because they had done work at the house before. As I would always do when I have someone come into a house to clean up, I chaperoned them around. As I said they had to remove blood spots and paint splatters. However, there were no urine stains which needed to be cleaned. I did not see any signs of urine, and I did not smell it, as I would have done had someone urinated around the house.
23. Also, none of the doors inside the house were damaged or any locks on doors which had them. One thing which I did notice was that the blood spots appeared in a number of different rooms around the house. As I knew that Mr Depp's finger had been cut, I believed that he must have walked away from where it happened, which I believe was the bar area where I found the fingertip.
24. I did not see any injuries on Ms Heard when I saw her that day. She was certainly very hysterical and emotional, but there was no sign of any physical injury. As I explained in my first statement, I volunteered to accompany Ms Heard back to Los Angeles. I remember thinking that it

would be better if she went home. By the time of the flight I was exhausted, as was Ms Heard, and I slept most of the flight. However, I did notice on one arm that she had a couple of marks which were looked like cuts in fairly uniform lines at a sort of diagonal angle downwards. I recall saying to her when we landed in LAX that she may want to pull her sleeve down as there might be paparazzi in the airport – just because it is LA. She did not refuse, but she chose not to. I did not have those marks in my mind when I made my first statement and said I saw no injuries.

25. When we landed, we were collected by a driver who I think worked for Mr Depp and I accompanied Ms Heard to her penthouse at the Eastern Columbia building.

STATEMENT OF TRUTH

I believe that the facts stated in this witness statement are true. I understand that proceedings for contempt of court may be brought against anyone who makes, or causes to be made, a false statement in a document verified by a statement of truth without an honest belief in its truth.

Signed..........

BEN KING

Dated: 13TH JULY, 2020

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(1) NEWS GROUP
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Defendants

WITNESS STATEMENT OF BEN KING

Ref: JA/JR/VA/D0185/001

Schillings
12 Arthur Street
Candlewick
London
EC4R 9AB

Tel: 020 7034 9000

On behalf of: Claimant
Witness: Ben King
No: Second
Exhibit BK2
Date: 13 July 2020

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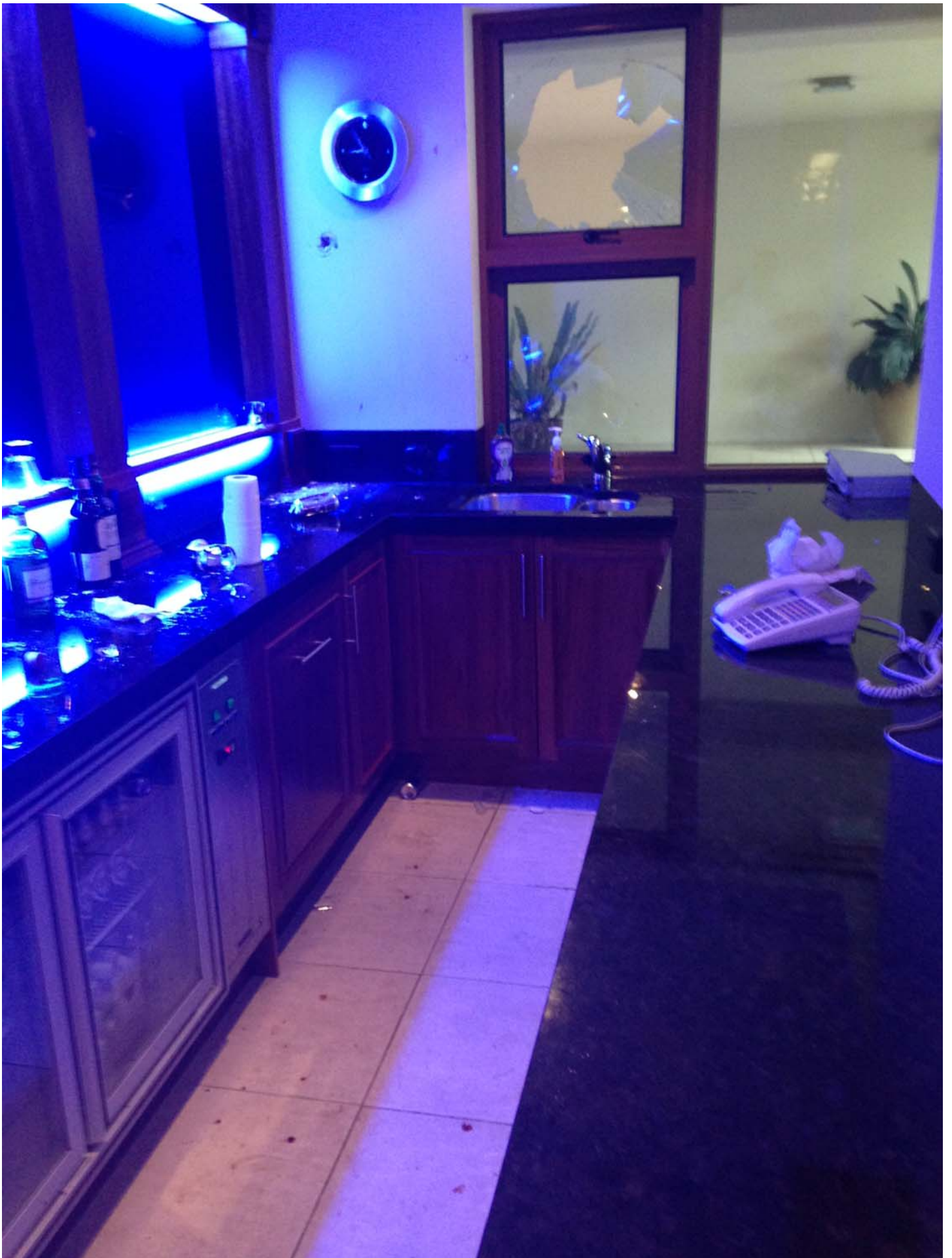
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**EXHIBIT BK2 TO THE SECOND
WITNESS STATEMENT OF BEN KING 13 JULY 2020**



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