

Privileged and Confidential

STATEMENT OF KEVIN MURPHY

I, Kevin Murphy, state as follows:

1. I am currently, and have been, an estate manager and assistant to Johnny Depp for many years. I have personal and firsthand knowledge of the matters set forth in this Statement, and if called as a witness, could and would testify competently thereto under oath.

2. Among other household responsibilities, one of my obligations is to assist Mr. Depp in the preparation of necessary travel-related paperwork for the household dogs, Pistol and Boo. This includes submitting the proper applications, making sure the dogs receive the proper vaccinations and certifications, and obtaining any necessary permits to allow transport of the dogs into foreign countries. On other occasions, Mrs. Depp's assistant, Kate James, would be responsible for obtaining the necessary travel-related paperwork for the dogs.

3. Over the years, I have been involved in obtaining the necessary travel-related paperwork for the dogs to travel to the United Kingdom, France, the Commonwealth of the Bahamas, Canada, and Brazil.

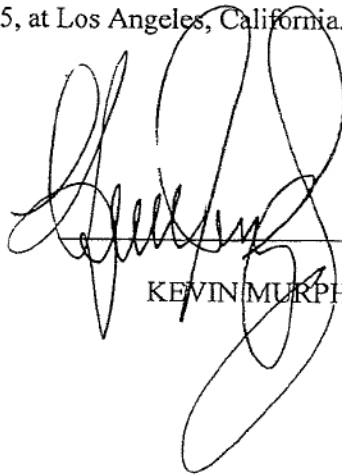
4. It is a household policy that neither Mr. Depp nor Mrs. Depp travel with the dogs unless all the proper travel-related paperwork has been completed and prior approval is obtained from the country of destination. In connection therewith, it is a household policy to arrange all the necessary travel-related paperwork for the dogs to legally travel with Mr. Depp and Mrs. Depp, and only inform Mr. Depp or Mrs. Depp about the arrangements if the necessary travel-related paperwork could not be obtained. If the necessary travel-related paperwork could not be obtained, either Ms. James or I would notify Mr. Depp and Mrs. Depp. Otherwise, Mr. Depp and Mrs. Depp would not be notified. In fact, there have been several instances when the dogs did

not travel internationally because the necessary travel-related paperwork could not be obtained in time, including a cancelled trip to the United Kingdom in August 2015.

5. Although Mrs. Depp initially instructed me to make arrangements for the dogs to travel to Australia in April 2015, it was Ms. James, an Australian citizen, who assumed the primary responsibility for preparing the necessary travel-related paperwork to permit the dogs to travel with Mrs. Depp to Australia. However, prior to the trip to Australia, Mrs. Depp terminated Ms. James' employment. Nevertheless, I was under the impression that prior to her termination, Ms. James had arranged for all necessary travel-related paperwork for the dogs to legally travel to Australia. Ms. James never indicated otherwise.

6. Per the household policy, Mr. Depp and Mrs. Depp would not have traveled with the dogs to Australia if they didn't believe all the necessary travel-related paperwork had been completed and approved.

Executed this 13th day of October, 2015, at Los Angeles, California.



KEVIN MURPHY