

On behalf of: Claimant  
Witness: John Christopher Depp II  
No: First  
Date: 25 February 2020

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

**Claim No. QB-2018-006323**

**B E T W E E N:**

**JOHN CHRISTOPHER DEPP II**

**Claimant**

**-and-**

**(1) NEWS GROUP NEWSPAPERS LTD**

**(2) DAN WOOTTON**

**Defendants**

---

**WITNESS STATEMENT OF MALCOLM CONNOLLY**

---

I, **MALCOLM CONNOLLY**, of Malcolm Connolly Security, 46-54 High Street, Ingatestone CM4 9DW, **WILL SAY** as follows:

1. I work in personal security and have done so for the past 23 years. I have worked for the Claimant, Johnny, and his family for the past 16 years.
2. Unless stated otherwise, the facts and matters referred to in this witness statement are within my own knowledge and true or are true to the best of my knowledge, information and belief based on sources stated within this witness statement.
3. I make this witness statement in support of the Claimant's claim in these proceedings.

On behalf of: Claimant  
Witness: Malcolm Connolly  
No: First  
Date: 25 February 2020

4. I do not know the full details of the Claimant's claims against the Defendants in these proceedings. I make this witness statement in response to paragraphs 99-130 of the witness statement of Amber Heard dated 15 December 2019, which I have seen and in which she refers to an incident in early March 2015 in Australia.
5. I was working for Johnny in Australia in March 2015 at the time of this incident, and I can say that Amber's account of when we had to take him to hospital to treat his finger injury on 8 March 2015 bears no resemblance to my recollection.
6. At the time I was staying in an apartment block called Peppers in Broad Beach. Most of the crew and security were all stationed there.
7. I remember at some point in the middle of the afternoon on 8 March 2015 getting an urgent call from Jerry Judge, who is no longer with us but who used to be in charge of Johnny's security. Jerry had been doing something else that day so he wasn't around. He told me to get out to the property urgently, with Andrew, the driver. His words were along the lines of "Malcom, get in the car, extract the Boss from the situation."
8. The property was just off the highway, with a long drive. Outside patrolling the grounds, for security reasons, there is always an RST (Resident Security Team) with two four-wheel vehicles and four guys.
9. I got to the door at around 1.30/2pm and knocked but there was no answer. I could hear the ruckus inside. I opened the door, which wasn't locked, and saw Johnny in the foyer area of the house. He and Amber were screaming at each other. She was wearing a sort of green silk night thing, you might call it a slip.
10. I shouted at Johnny words to the effect of "Come with me, you are coming with me". I then took his arm trying to move him out, but he broke away. I said again words to the effect of "Johnny, come with me." It wasn't easy but I did get him outside.
11. I had the car door open and when we were outside Johnny said to me words to the effect of "Look at my finger. She's cut my f\*cking finger off. She's smashed my hand with a vodka

On behalf of: Claimant  
Witness: Malcolm Connolly  
No: First  
Date: 25 February 2020

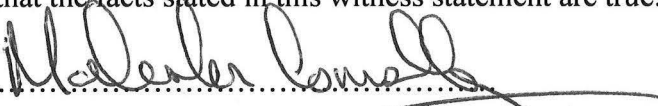

bottle.” I saw his finger and it was a mess. He also told us that she had put a cigarette out on his cheek. I could see the mark on his face.

12. Amber appeared at the door and then came close to the car, screaming and crying, calling out words along the lines of “Are you just going to leave it like this, you f\*king coward?” Then she was saying “I love you, I love you. Is this how you are going to end this?” She was not making a lot of sense: one second she was begging Johnny not to leave the house and then she was screaming at him for running away. She was absolutely hysterical. I was worried that she might start throwing objects at Johnny (or at myself), as I had seen her throw objects before. For example, I had seen her lob a fork in Johnny’s general direction once; another time I recall she threw a lighter at him; another time a can of coke. I knew that we needed to get out of there as soon as possible.
13. I could see Amber’s face very clearly. She did not have any marks on her face or arms. She didn’t look in any physical distress. I was much more concerned about Johnny. He was obviously in emotional distress and panicking. He wasn’t that drunk or out of it though and was easily standing on his own and having a conversation.
14. I would estimate that I was there for around 25 minutes in total.
15. We then took Johnny to my apartment at around 2pm, on the basis it was private. Fortunately one of my guys, Trevor, was there when we were getting into the lift and I told him to stop anyone else using the lift so I could get Johnny in without anyone seeing him.
16. As soon as we got into my apartment, I started cleaning Johnny’s finger in my bathroom. When I saw it properly, I knew it was too much for me, even though I’m first aid trained.
17. Debbie, Dr Kipper’s nurse, had been allocated an apartment in the same block as me. I called her, got her to my apartment (it took her about three minutes from when I called her) and she started the triage on Johnny’s finger. She then called Dr Kipper and asked him to come over and have a second look.

On behalf of: Claimant  
Witness: Malcolm Connolly  
No: First  
Date: 25 February 2020

18. When Dr Kipper arrived, probably about 30 minutes after Johnny and I had got there, he said it was way beyond his capability and told us that we needed to take Johnny to hospital. Jerry and I then took Johnny to hospital with Dr Kipper and Nurse Debbie. It must have been around 4.30/5 o'clock.
19. We knew that we could not let the true cause of Johnny's injuries become known as this would create extremely bad publicity. As a result, Jerry suggested that we should say Johnny had injured his finger whilst slicing onions. I thought it was fairly obvious that this was not true given the severity of the injury and suggested we say he jammed it into a car door. However we went with the onion cover story. The specialist didn't believe us for one second.
20. Johnny didn't go back to the house over the next few days. Instead he stayed in my apartment with me.

I believe that the facts stated in this witness statement are true.

Signed:   
**Malcolm Connolly** 

Date: 25 February 2020

On behalf of: Claimant  
Witness: Malcolm Connolly  
No: First  
Date: 25 February 2020

**Claim No. QB-2018-006323**

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

**BETWEEN:**

**JOHN CHRISTOPHER DEPP II**

**Claimant**

**- and -**

**(1) NEWS GROUP NEWSPAPERS LTD**

**(2) DAN WOOTTON**

**Defendants**

---

**WITNESS STATEMENT OF  
MALCOLM CONNOLLY**

---

**Ref: JA/JR/VA/D0185/001**

**Schillings International LLP  
41 Bedford Square  
London  
WC1B 3HX**