

On behalf of: Claimant
Witness: Stephen Deuters
No: First
Exhibit: SD1
Date: 12 December 2019

**IN THE HIGH COURT OF JUSTICE
QUEENS BENCH DIVISION
MEDIA AND COMMUNICATIONS LIST**

Claim No. QB-2018-006323

JOHN CHRISTOPHER DEPP II

Claimant

-and-

**NEWS GROUP NEWSPAPERS LTD
DAN WOOTTON**

Defendant

**FIRST WITNESS STATEMENT OF
STEPHEN DEUTERS**

I, **STEPHEN DEUTERS**, of London, **WILL SAY** as follows:

1. I was formerly a personal assistant for the Claimant, Mr John Christopher Depp II, and I am now the European president of Mr Depp's company, Infinitum Nihil. I have worked continuously for Mr Depp since June 2004. In my role as Mr Depp's assistant, I regularly accompanied Mr Depp both for work and for personal matters. From 2004-2017, I probably accompanied Mr Depp on the majority of work trips.
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. There is now produced to me and marked "**Exhibit SD1**" a paginated bundle of true copy documents referred to in this witness statement. References to page numbers are references to Exhibit SD1, unless otherwise stated.

4. I make this witness statement in support of the Claimant's claim in these proceedings.
5. I have been shown the Defendants' Amended Defence dated 21 June 2019 and the Amended Reply dated 26 July 2019. The purpose of this witness statement is to address some of the allegations set out in the Amended Defence.
6. As a general point, I understand that it is alleged at paragraph 8.a. of the Amended Defence that: "*Throughout their relationship the Claimant was verbally and physically abusive towards Ms Heard*". I was with Mr Depp and Ms Heard very regularly throughout this period and I never saw any cuts, bruises or other injuries on Ms Heard; neither did Ms Heard ever mention that she was the victim of any verbal or physical abuse, with the exception of the matter dealt with at paragraphs 7-13 below.

24 May 2014 – Private Flight

7. At paragraph 8.a.3, it is alleged that:

"After drinking heavily, the Claimant threw objects at Ms Heard causing her to retreat to a different seat. The Claimant then provocatively pushed a chair at her as she walked by, yelled at her, and taunted her. When Ms Heard stood up, the Claimant kicked her in the back, causing her to fall over. The Claimant threw his boot at her while she was on the ground. The Claimant continued to scream obscenities until he went into the bathroom of the aeroplane and passed out."
8. I accompanied Mr Depp and Ms Heard on the flight on this date from Boston to Los Angeles, along with Mr Jerry Judge and Keenan Wyatt, who also worked for Mr Depp. Mr Judge and I were able to see Mr Depp and Ms Heard throughout the flight as our seats were facing them. Mr Depp and Ms Heard were sat at the central table on the aeroplane. A diagram of the layout of the aeroplane is exhibited at SD1/p.1.
9. The account relied upon above is completely untrue. As I was sitting on the flight, I could see that Ms Heard was speaking at Mr Depp in an increasingly aggressive manner whilst he was focussed on his notebooks, within which he often wrote or drew when flying. At this point, I had my headphones on so I could not hear the specifics of what she was saying but I could see her gesticulating and I could tell from her manner that her voice was raised. She continued to harangue Mr Depp whereas he did not engage with the abuse he was receiving.
10. At some point, Ms Heard stood up and when her left side was towards Mr Depp, Mr Depp made a playful attempt to tap her on the bottom with his shoe. From where I was sitting, I do not believe that Mr Depp made contact with Ms Heard. Given the

position in which Mr Depp was sitting, it would have been impossible to kick Ms Heard in the manner in which she has described it. The level of movement would not have been possible from Mr Depp's seated position, given the layout of the aeroplane. However, Ms Heard took great offense at what was clearly a harmless gesture and increased her abuse of Mr Depp in an extremely unpleasant manner. By this time I had taken off my headphones and I could hear Ms Heard shouting at Mr Depp. I cannot recall the specifics of the abuse but I do remember her making out that the attempted tap was a significant issue.

11. At this stage, Mr Judge and I decided to intervene in order to attempt to calm down Ms Heard, who was now hysterical and was shouting at both of us words to the effect of "*did you see him kick me?*". Mr Judge took Ms Heard aside, as he often had to do when Ms Heard regularly lost her temper, and attempted to calm her down in another part of the aeroplane. I believe I spoke briefly to Mr Depp and he then retreated to the bathroom of the plane where he remained for the rest of the flight. This was a common theme on the multiple times when Mr Depp was abused by Ms Heard – he would take himself away from the situation, often to a bathroom, and lock himself out of harm's way. During the course of their relationship, I remember Mr Depp telling me that he would lock himself in the bathroom on multiple occasions and I remember turning up to find him locked in a bathroom on one occasion, although I cannot remember specifically when this was.
12. At no point did Mr Depp kick Ms Heard to the ground; nor did he throw a boot at her. Further, it is alleged that he "*pushed a chair at her*"; this did not happen and would have been impossible in any event as all chairs in the plane were fixed to the floor, as has been the case in all flights on which I have travelled.
13. Immediately after the flight, Ms Heard continued to insist that Mr Depp had "*kicked*" her both to Mr Depp and to me and Mr Judge. This was the exact word she used when she described the incident to me and to Mr Judge and Mr Wyatt, despite the fact that the incident took place as described above. The following day, on 25 May 2014, Mr Depp asked me to try to mollify Ms Heard and to say whatever was needed to try to placate her. I cannot remember exactly what he said but it was words to that effect. Given Ms Heard's extremely volatile nature, I thought it best to try to engage with her on her own terms and simply apologise for what she was alleging had happened; hence my use of the word "*kicked*" which is the word which Ms Heard herself had used. As I have made clear, Mr Depp had not kicked Ms Heard. By this stage, I had learnt from my interactions with Ms Heard that her anger was a constant issue.

Accordingly, I always tried to simply engage with her on her own terms and to be as nice as possible.

25 January 2015

14. At paragraph 8.a.7 of the Amended Defence, it is alleged that Mr Depp physically abused Ms Heard in a hotel room on a trip to Tokyo in January 2015. I was not present in their hotel room but I was present on this trip and Ms Heard was in good spirits throughout the trip. At no point did she have any cuts, bruises or other injuries and at no point did she say anything about Mr Depp physically abusing her.

3 and 4 March 2015

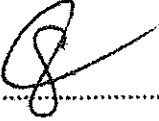
15. At paragraphs 8.a.8-11 of the Amended Defence, it is alleged that Mr Depp subjected Ms Heard to a three-day ordeal of physical assault which left her with a broken lip, swollen nose and cuts all over her body. It is also alleged that Mr Depp severely injured his finger by slamming a plastic telephone against the wall.
16. I was not present when Mr Depp sustained the injury to his finger; however, I saw Mr Depp shortly after, as described below. I had been told by Mr Judge that Mr Depp had sustained an injury, although at that time I did not know the cause of the injury. I believe that Mr Judge and another member of Mr Depp's security team, Malcolm Connolly, went to the house in which Mr Depp was staying with Ms Heard. They then picked Mr Depp up and brought him back to the hotel where we were staying and where Mr Depp also had a room reserved. It was at this point that I saw Mr Depp, who was clearly in a considerable amount of pain.
17. When we were in the hotel room with Mr Depp, we removed some bandaging from his finger and inspected his injury. We were shocked to discover that the tip of the finger had been severed; the gruesome sight clearly indicating that immediate medical treatment was required and so, along with Mr Judge and Mr Connolly, we took Mr Depp to the hospital. I believe we were at the hospital for a couple of hours before returning to the hotel. Once he had returned to the hotel, Mr Depp went to sleep.
18. The following day Mr Depp told me, Mr Judge and Mr Connolly that he had sustained his injury when Ms Heard had thrown a bottle at him which smashed on his hand. He also told us, and we were able to see, that Ms Heard had put a cigarette out on Mr Depp's cheek. However, Mr Depp did not want to cause alarm by letting the true cause of his injuries be known. Accordingly, we were instructed to say that Mr Depp had caught his finger in a door.

19. Shortly after this incident, Ben King, Mr Depp's then house manager, escorted Ms Heard back to Los Angeles. At no point did he, or anyone else, mention any evidence of Ms Heard being the victim of physical abuse. I did not see Ms Heard at all in the brief period following Mr Depp's injury.

The various other allegations

20. In relation to the various other allegations set out at paragraph 8 of the Amended Defence, I was with Mr Depp very regularly in this period and saw Ms Heard on many occasions. At no point did Ms Heard ever mention any physical abuse and I never saw evidence of any injury to Ms Heard. In contrast, Mr Depp told me on multiple occasions that Ms Heard had attacked him or abused him physically and verbally. The first time Ms Heard ever made any allegation of physical abuse against Mr Depp was when she filed for a Temporary Restraining Order (the "TRO") in 2016 in reliance on the alleged incident at paragraph 8.a.20 of the Amended Defence on 21 May 2016. All of the other allegations at paragraph 8 seem to have only been made subsequently.
21. In relation to the TRO, I, along with many others, was extremely surprised and outraged when this hit the press. I knew that Ms Heard was the abuser in the relationship and I was appalled that she would behave in this way. She had subjected Mr Depp to years of abuse and I knew she had been arrested for domestic abuse in the past in relation to her former wife.

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

Signed: 

Stephen Deuters

Date: 12 December 2019

On behalf of: Claimant
Witness: Stephen Deuters
No: First
Exhibit: SD1
Date: 12 December 2019

Claim No. HQ18M01923

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

JOHN CHRISTOPHER DEPP II

Claimant

- and -

(1) NEWS GROUP NEWSPAPERS LTD

(2) DAN WOOTTON

Defendant

**FIRST WITNESS STATEMENT OF
STEPHEN DEUTERS**

Brown Rudnick LLP
8 Clifford Street
London W1S 2LQ
T: +44 20 7851 6000
Solicitors for the Claimant

Ref: NPM/OB/034692.0002
nmicklethwaite@brownrudnick.com
obischof@brownrudnick.com
telton@brownrudnick.com

On behalf of: Claimant
Witness: Stephen Deuters
No: First
Exhibit: SD1
Date: 12 December 2019

IN THE HIGH COURT OF JUSTICE
QUEENS BENCH DIVISION
MEDIA AND COMMUNICATIONS LIST

Claim No. QB-2018-006323

JOHN CHRISTOPHER DEPP II

Claimant

-and-

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

Defendant

FIRST WITNESS STATEMENT OF
STEPHEN DEUTERS

This is the "Exhibit SD1" referred to in the witness statement Stephen Deuters dated 12 December 2019

Signed:

Stephen Deuters

Date: 12 December 2019

