

On behalf of: Claimant  
Witness: Kate James  
No: First  
Exhibit KJ1  
Date: 5 June 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 KATE JAMES**

---

I, **KATE JAMES** of [REDACTED] **W Hollywood, WILL SAY** as follows:

1. I work as a personal assistant to high profile people in the entertainment industry. I have been working in that capacity in Los Angeles for approximately 20 years. I worked for Amber Heard from around March 2012 until February 2015.
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.

4. I do not know the full details of the Claimant's claims against the Defendants in these proceedings.

#### **Start of my employment by Amber Heard**

5. I had not heard of Amber at the time that I was hired. My son was 4 years old at the time, and Amber was looking for someone part-time and she lived in the same neighbourhood as me which is an important factor in LA with the traffic to consider. The terms suited me as I would be able to pick up my son from school every day. A similar part-time and flexible position is extremely difficult to find in my line of work. I recall being surprised when she chose to hire me since I am almost 20 years her senior, I briefly pondered on why she didn't choose a candidate closer in age to her. However I needed the work and accepted it.
6. Amber was already dating Johnny when I started working for her. At first, Amber didn't tell me who Johnny was, and would speak in disparaging terms about him. She would say that she was "*dating this old man*" and suchlike. She then disclosed that it was Johnny Depp, and I met him shortly after that. My first impression of him was how softly spoken and peaceful he was, almost a bit shy. He was very pleasant and courteous upon meeting me.

#### **Alcohol abuse**

7. During my time working for her, Amber would drink vast quantities of red wine each night. Meanwhile, she would ask me to buy Johnny non-alcoholic beer, as that's all that she would allow him to drink.

#### **My experience of Amber and Johnny's relationship**

8. In the three years that I worked for Amber, I would go to her house almost every day, including on weekends. I would not announce when I was going to attend the apartment to drop things off or pick things up, so it would regularly be without notice. I never saw any sign of an altercation, or even the aftermath of a serious and messy fight in the way that Amber describes in her statements.

On behalf of: Claimant  
Witness: Kate James  
No: First  
Exhibit KJ1  
Date: 5 June 2020

9. I never saw any physical violence by either Amber or Johnny. I saw Amber much more frequently than Johnny, almost every day for three years apart from when she was out of town. I understand that the period of my employment overlaps with the majority of incidents in which Amber has alleged that Johnny was violent towards her. I never once saw any bruising, swelling, or any evidence of what could have resulted from violence. I would often see her naked, or semi-naked, when she was getting dressed or at fittings. I was around her a lot, often 7 days a week.
10. Johnny was calm and quite shy in all of my experiences of him. He was always thoughtful and kind, and a genuinely decent person. I remember on more than one occasion where I had to bring my son back to work with me after picking him up from school. Johnny would be there and would hang out with him, teaching him how to play the guitar. He would be patient and kind with him. I would never have left my son with Johnny while I was working if I had any concerns about him whatsoever. Johnny would come back from travelling with gifts like little skull necklaces for his children, and he would always bring an extra one back for my son. I thought this was very thoughtful and kind, particularly considering that Amber was my employer and not him.

#### **Letter to the Department of Homeland Security, September 2014**

11. Amber asked me to send a letter she had drafted to Homeland Security in September 2014. She had hired a girl called Savannah McMillan to work as her set assistant. Savannah, a British citizen, had been held in immigration and questioned about the frequency that she had been coming and going from the USA. Amber's letter falsely claimed that Savannah was just a friend, and not an employee, so it was correct that she only had a tourist visa.
12. In Amber's letter, she called it fraudulent that it was being alleged that Savannah was working for Amber unlawfully. She said that as Savannah's "friend" she could "*say truthfully and unequivocally that this allegation is entirely false ... I would like to go on the record saying that Savannah McMillan is a personal friend, and to my knowledge, has never worked unlawfully or otherwise in the United States. Or for me.*" I knew this to be untrue, and that

On behalf of: Claimant  
Witness: Kate James  
No: First  
Exhibit KJ1  
Date: 5 June 2020

Amber was therefore wilfully lying to the US immigration department. I took a photograph of the letter and one of the pay checks from Amber to Savannah. A copy of these photographs is attached at pages 1-2 of KJ1.

### **Australia, 2015**

13. I am aware that shortly after Amber fired me, she got into trouble for unlawfully smuggling her dogs into Australia. We had previously used a dog transportation company who were hired to sort out the necessary paperwork and guide us through the process of preparing the dogs. This had worked well in 2014 when Amber took the dogs to England. When it became clear that Amber was intending to go to Australia, we were advised that it's a six-month process to prepare the dogs' immigration and began the process. Ultimately as the departure time approached, we became aware that there would be a discrepancy of around 10 days for the dogs to travel by private jet to Australia, the only other option being that they would have to travel in the hold on a commercial flight on the correct date.
14. I would attempt to talk to Amber about the date discrepancy frequently while we were trying to sort out the logistics, but her eyes would glaze over, and she would walk away. I discussed with Kevin Murphy about my concerns about the deadline, and Kevin in turn also then emailed Amber to explain that there would be a problem if they travelled before the correct departure date and that it would be illegal. Amber chose to ignore both of us. She deliberately smuggled the dogs into Australia. As in several circumstances which I observed, it was as if she felt that she was above the law.
15. It is my understanding that someone then took them to a local grooming parlour in Australia and started bragging that they were Johnny Depp's dogs. The owner posted about it on Facebook, and Amber got found out.
16. I remember the huge uproar at the time. I was told that Johnny had to send the dogs back to Los Angeles on a private jet, which would have cost a fortune from Australia. Ultimately, I woke up one morning many months later to find an email from my mother with an

On behalf of: Claimant  
Witness: Kate James  
No: First  
Exhibit KJ1  
Date: June 2020

attachment of a newspaper article from my home town of Brisbane. I was devastated when I found out that Amber had blamed me in court. I broke down in tears at the thought that she blatantly lied in court in my home town and blamed me. Obviously I knew that was a complete lie and yet she had no problem in apparently perjuring herself in order to avoid responsibility.

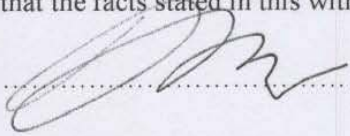
17. I have been told about the discussion that took place where Amber contemplated asking Kevin to ask me to sign a false statement to support her position that she did not know the dogs were not ready to be taken into Australia. Amber knew they weren't ready, yet chose to take them anyway. The fact that she was willing to ask me to sign such a statement under oath, especially as an Australian who cares and understands about the laws of my own country, is a reflection of her approach to me (and anyone in fact) in general. She did not care about throwing anyone under the bus, if it meant saving her own skin. Even if it meant lying in Court and to authorities. I believe it would have been obvious to Amber that I would not lie for her and so she decided not to approach me.

18. I recall a previous occasion in September 2013 when I was asked to speak with Kevin Murphy about amending the dogs' medical records so that they could travel together on 25 September 2013. Amber asked me if I knew a vet she could "grease". I attach the email at page 3 of KJ1.

**End of employment**

19. Amber fired me on 16 February 2015, pretty much right after she got back from their wedding in the Bahamas. She blindsided me.

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

Signed:  .....

**Kate James**

Date: 5th June 2020

On behalf of: Claimant  
Witness: Kate James  
No: First  
Exhibit KJ1  
Date: 5 June 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  
KATE JAMES**

---

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

**Schillings International LLP**

12 Arthur Street  
Candlewick  
London  
EC4R 9AB

Tel: 020 7034 9000

On behalf of: Claimant  
Witness: Kate James  
No: First  
Exhibit KJ1  
Date: 5 June 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**

---

**EXHIBIT KJ1 TO THE WITNESS STATEMENT OF KATE  
JAMES 5 JUNE 2020**

---



AMBER VANREE  
803 W SUNSET BLVD  
LOS ANGELES CA 90046-2401

312

11-03/1210 CA  
90418

5/9/14

Date

Pay to the  
Order of

Savannah McMillan

\$ 1625

Deliver



www.bankofamerica.com

**Bank of America**

ACH/RVT 121000000

For

*AVR*

⑆ 21000358⑆ 164104759708⑆ 0312



September 26, 2014

To whom it may concern,

My name is Amber Heard. I am a proud lawful American citizen.

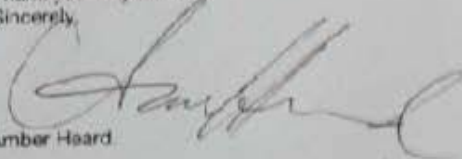
I am writing this letter in response to a fraudulent report made against my English friend, Savannah McMillen. It has come to my awareness that while spending time visiting me in the United States someone made a false claim against her stating, without any proof or corroboration, that she was unlawfully working for me.

As her friend, I can say truthfully and unequivocally that this allegation is entirely false. It was clearly made from the safety of anonymity in order to satisfy a personal vendetta. This allegation absolutely bears no merit, worth or truth.

I would like to go on record saying that Savannah McMillen is a personal friend and to my knowledge has never worked unlawfully or otherwise in the United States. Or for me. I regret that the precious time of our immigration agencies has been bastardized on such a petty personal matter made out of malice, not truth.

I would like to request that this fraudulent report be removed pending the confirmation of its baseless and false stance. I expect the same standards that we hold as pillars in our great justice system, be allied to immigration policies, as they serve at the forefront in representing United States and her values. Since I expect further investigation to reveal the statements made above as true, I hope that your agency will see to it that no further inconvenience will befall my friend in her attempts to continue discovering our beautiful country.

Thank you for your time,  
Sincerely,

  
Amber Heard

Sunday, June 5, 2016 12:21 PM

Subject: Pistol and boo

Date: Saturday, September 21, 2013 at 11:40 AM

From: Amber Heard [REDACTED]

To: Kate James [REDACTED]

Can you maybe help Kevin procure a slightly altered health doc that has their shots recorded as two days before so they can all leave together on the 25th?? Do we have a vet we could grease ? Connection?

Sent from my iPhone

*Left Intentionally Blank*

D197-D209