

On behalf of: Claimant
Witness: Travis McGivern
No: First
Date: February 2020

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

Claim No. QB-2018-006323

JOHN CHRISTOPHER DEPP II

Claimant

-and-

(1) NEWS GROUP NEWSPAPERS LTD

(2) DAN WOOTTON

Defendants

**WITNESS STATEMENT OF
TRAVIS MCGIVERN**

I, **TRAVIS MCGIVERN**, of [REDACTED] CA 91505
WILL SAY as follows:

1. I have worked as a security guard for the Claimant, John Christopher Depp II, for almost 7 years from March, 2013 onwards. I work for him chiefly in Los Angeles, where I am based, although I have occasionally travelled with him. I have worked in the security and personal protection industry since late 2005.
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.

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3. I make this witness statement in support of the Claimant's claim in these proceedings. I do not know the details of the Claimant's claims against the Defendants, but I have read paragraphs 131 to 134 of Amber Heard's first witness statement dated 15 December 2019 and paragraphs 57 to 64 of Whitney Henriquez's witness statement dated 12 December 2019. I make this witness statement in response to those paragraphs.
4. It is alleged at paragraphs 131 to 134 of Ms Heard's first witness statement and at paragraphs 57 to 64 of Ms Henriquez's statement that there was an incident in March 2015, where Ms Heard and Mr Depp had an argument in the presence of Ms Heard's sister, Ms Henriquez, and members of Mr Depp's team. I believe that Ms Heard is referring to an incident at which I was present. I have set out my recollection below.
5. On 23 March 2015, I was working a security shift at Mr Depp's residence at 849 South Broadway, Los Angeles, California 90014, United States (the "**Building**"), where Mr Depp was also staying at the time. At some time between 4 am to 6 am, Mr Depp contacted me and asked me to come to Penthouse 5, which is the penthouse he owns in the Building adjacent to his principal home in Penthouse 3. He also asked me to bring a nurse who works for Mr Depp called Debbie Lloyd. I do not recall him specifying why he wanted Nurse Lloyd to come. When Ms Lloyd and I entered his residence, Ms Heard and Mr Depp were having a verbal argument. Ms Heard's sister was also present. I cannot recall the specifics of what was being said but there was a lot of shouting mixed in with some moments of calmer communication. This argument lasted approximately 60 to 90 minutes.
6. When I arrived at Penthouse 5, I initially stood just outside the apartment with the door open in order to give Ms Heard and Mr Depp their space. When the argument got louder and more intense, I entered the apartment and stood in their general vicinity without intervening. At some point approximately 30 to 45 minutes after my arrival, Ms Heard threw a full can of Red Bull that hit Mr Depp in his back. I note that Ms Henriquez states at paragraph 61 of her witness statement that it was Mr Depp who threw a Red Bull can at us and that it allegedly hit Ms Lloyd. This did not happen.

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7. After Ms Heard threw the can of Red Bull, I recognized that Ms Heard had access to a variety of other items that she could throw from her position. I therefore moved next to Mr Depp to ensure that he would not get hit by anything else. At this point, Ms Heard was standing on the landing above Mr Depp and I witnessed her spit on Mr Depp from above.
8. Ms Heard also tried to throw her purse at Mr Depp, but I deflected it mid-air. Approximately 10 minutes before we left, I witnessed Ms Heard punch Mr Depp in the eye with a closed fist.
9. Ms Heard and Ms Henriques then left Penthouse 5. Ms Lloyd then engaged in conversation with Mr Depp and persuaded him that we should leave. We then went to the vehicle with Mr Depp.
10. It is alleged at paragraph 132 of Ms Heard's first witness statement that Mr Depp pushed Ms Henriquez out the way so that he could reach Ms Heard. This did not happen and at no point did Mr Depp push Ms Henriquez.
11. I further understand that it is alleged in the same paragraph that Mr Depp hit Ms Heard repeatedly with one hand whilst holding her hair with the other, and that Mr Depp's security had to step in to separate them. Once again, this did not happen and at no point did Mr Depp hit Ms Heard.

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

Signed: 

Travis McGivern

Date: 25 February 2020

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