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2 **SPECTOR LAW, A Professional Law Corporation**
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7 Attorneys for Petitioner,
8 AMBER LAURA DEPP

FILED
Superior Court of California
County of Los Angeles

MAY 27 2016

Sherri R. [Signature], District Clerk/Clerk
By [Signature], Deputy
Manuel Almendras

9 SUPERIOR COURT OF THE STATE OF CALIFORNIA
10 FOR THE COUNTY OF LOS ANGELES

11 In re the Marriage of:

12 Petitioner: AMBER LAURA DEPP,
13 and

14 Respondent: JOHN CHRISTOPHER
15 DEPP II (AKA JOHNNY
16 DEPP)

CASE NO. BD 641 052

Judge: Hon. Carl H. Moor
Department: 6

**DECLARATION OF SAMANTHA F.
SPECTOR, ESQ. RE EX PARTE NOTICE
AND IN SUPPORT OF PETITIONER AMBER
LAURA DEPP'S DVRO REQUEST**

Date: May 27, 2016
Time: 8:30 a.m.
Dept.: 6

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19 I, SAMANTHA F. SPECTOR, declare as follows:

20 1. I am an attorney at law duly licensed to practice before all court of the State of
21 California and I am the managing attorney at Spector Law, APLC, attorneys of record for
22 Petitioner, Amber Laura Depp, herein. I have firsthand personal knowledge of the facts stated
23 herein and if called as a witness, I could and would competently testify thereto.

24 **EX PARTE NOTICE GIVEN**

25 2. On May 26, 2016, at approximately 9:45 a.m., I telephoned Respondent John
26 Christopher Depp II's ("Johnny") counsel, Laura Wasser, Esq. I asked to speak to Ms. Wasser
27 and was told she was not available. I then requested to speak to Samantha Klein, Esq., and was
28 also told she was unavailable. I was then directed to voicemails for both; instead I asked to speak

1 to Ms. Wasser's assistant, Linda Bigbee, and was told she too was unavailable and directed to
2 her voicemail.

3 3. I left a voicemail for Ms. Wasser at 9:45 a.m. and advised her that Petitioner,
4 Amber Laura Depp ("Amber"), would be appearing ex parte at 8:30 a.m. on Friday, May 27, 2016,
5 in Department 6 of the Los Angeles Superior Court located at 111 North Hill Street, Los Angeles,
6 California 90012 on the instant matter. Specifically, I stated that Amber would be requesting a DV
7 CLETS TRO against Respondent John Christopher Depp II ("Johnny"), including requests for: (1)
8 pendente lite spousal support payable by Johnny to Amber; (2) Amber's exclusive use and
9 possession of the [REDACTED] residence; (3) exclusive use and possession of the black
10 Range Rover vehicle which Amber is currently driving; (4) Amber's exclusive possession of the
11 dogs, Pistol and Boo; and (5) a contributive payment by Johnny for Amber's attorney fees and
12 accounting costs.

13 4. I then sent a follow-up email to Ms. Wasser stating all of the above in writing, and
14 copying Ms. Klein and Ms. Bigbee. A true and correct copy of my email to Ms. Wasser dated
15 May 26, 2016 at 9:52 a.m., confirming my ex parte notice, is attached hereto as **Exhibit "A."**

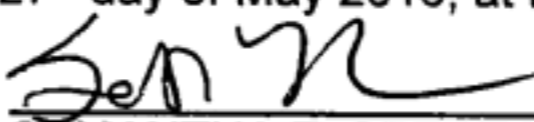
16 5. Thereafter, at approximately 9:59 a.m. I was able to speak directly to Mrs. Klein
17 and I advised her of all of the above via telephone.

18 **ATTEMPTS TO RESOLVE ISSUES PRIOR TO INSTANT EX PARTE AND DVRO REQUEST**

19 6. I attempted to resolve this matter with Johnny's counsel prior to giving notice for
20 the instant Request for Order re: Domestic Violence Restraining Orders.

21 7. On May 24, 2016, I sent a letter to Johnny's business attorney, Jacob A. Bloom.
22 I stated that, although Amber had been attacked and remained in fear for her safety, given the
23 notoriety of both parties and the high likelihood of press harassment, Amber would prefer to settle
24 the matter amicably out of Court. A true and correct copy of my letter to Mr. Bloom dated May
25 24, 2016, is attached hereto as **Exhibit "B."**

26 I declare, under penalty of perjury pursuant to the laws of the State of California, that the
27 foregoing is true and correct. Executed this 27th day of May 2016, at Los Angeles, California.

28 
SAMANTHA F. SPECTOR

**DECLARATION OF PETITIONER
AMBER LAURA DEPP**

2 **ATTACHMENT TO FORM DV-100**

3 **DECLARATION OF AMBER LAURA DEPP**

4 I, AMBER LAURA DEPP, declare as follows:

5 1. I am the Petitioner herein. I have firsthand personal knowledge of the facts stated
6 herein and if called as a witness, I could and would competently testify thereto.

7 2. I submit this declaration in support of my Request for CLETS Domestic Violence
8 Restraining Orders against Respondent John Christopher Depp II aka Johnny Depp ("Johnny").
9 I am also requesting *pendente lite* spousal support, exclusive possession of the residence located
10 at [REDACTED] in downtown Los Angeles ("Broadway residence"), exclusive possession of
11 the 2015 Range Rover vehicle, and attorneys' fees.

12 3. Johnny and I began living together in or about 2012, and we were married on
13 February 3, 2015. We do not have any children together.

14 4. During the entirety of our relationship, Johnny has been verbally and physically
15 abusive to me. I endured excessive emotional, verbal and physical abuse from Johnny, which
16 has included angry, hostile, humiliating and threatening assaults to me whenever I questioned
17 his authority or disagreed with him.

18 5. Johnny has a long-held and widely-acknowledged public and private history of
19 drug and alcohol abuse. He has a short fuse. He is often paranoid and his temper is
20 exceptionally scary for me as it has proven many times to be physically dangerous and/or life-
21 threatening to me. Johnny relationship with reality oscillates, depending upon his interaction with
22 alcohol and drugs. As Johnny's paranoia, delusions and aggression increased throughout our
23 relationship so has my awareness of his continued substance abuse. Because of this, I am
24 extremely afraid of Johnny and for my safety. I am petrified he will return at any moment to the
25 [REDACTED] residence, to which he has full access to despite my repeated pleas to his security
26 team to prevent otherwise and to protect me, if restraining orders are not immediately issued.
27 I strongly believe that in addition to DVROs, Johnny also requires enrollment in anger
28 management courses and a Batterer's intervention program.

2 **Recent Events Supporting the Basis of the Instant DVRO Request**

3 6. Since early 2013 and throughout the entirety of our marriage, Johnny and I have
4 resided at the Broadway residence. The residence is comprised of connected units. I am
5 requesting exclusive possession and use of the 3 unit condominium (i.e., Units 3, 4 and 5).

6 7. On April 21, 2016, I celebrated my birthday with my friends at the [REDACTED]
7 residence. As everyone was preparing to leave my birthday party, Johnny showed up, inebriated
8 and high. After my guests had left, Johnny and I had a discussion about his absence from my
9 birthday celebration which deteriorated into a bad argument that started with Johnny throwing a
10 magnum size bottle of champagne at the wall and a wine glass on me and the floor --both which
11 shattered. Johnny then grabbed me by the shoulders and pushed me onto the bed, blocking the
12 bedroom door. He then grabbed me by the hair and violently shoved me to the floor. Johnny was
13 also screaming and threatening me, taunting me to stand up. After several minutes, Johnny
14 stormed out of the condominium, but not before tossing aside and breaking nearly everything in
15 his path.

16 8. I did not see Johnny again for another month.

17 9. The next time I saw him was on May 21, 2016. He arrived at the [REDACTED]
18 residence at approximately 7:15 p.m. He was inebriated and high. At the time of Johnny's arrival,
19 my friend Elizabeth Marz was present, along with my friend Raquel Rose Pennington and her
20 fiancé Joshua Drew who live in the adjacent apartment at the [REDACTED] residence.

21 10. When Johnny arrived, at first, we were having a peaceful conversation in our living
22 room talking about his mother's passing as I tried to comfort him while we sat on the couch.
23 Suddenly, he began obsessing about something that was untrue and his demeanor changed
24 dramatically. He became extremely angry. I tried to calm Johnny down by calling one of his
25 trusted employees to alleviate his misplaced concerns, but it did not work.

26 11. Johnny was becoming increasingly enraged. I began to have concerns for my
27 safety and sent a text to my friend Raquel who was in the condominium next door. I texted her
28 to ask her to come over. As Johnny continued to rant in an aggressive and incoherent manner,

2 he then demanded we call our friend iO Tillet Wright ("iO") to prove his paranoid and irrational
3 accusations about some delusional idea he was having.

4 12. As my call to iO went through on speaker phone, Johnny ripped the cell phone
5 from my hand and began screaming profanities and insults at iO. I heard iO yell at me to get out
6 of the house. Johnny then grabbed the cell phone, wound up his arm like a baseball pitcher and
7 threw the cell phone at me striking my cheek and eye with great force.

8 13. I immediately covered my face and was crying because of the pain resulting from
9 the phone hitting me. Johnny charged at me, insisting on seeing my face. He taunted me,
10 challenged whether or not the cell phone actually hit me. He then forceably pulled back my hair
11 as I attempted to stand up from the sofa. I then yelled out "Call 911" – hoping it would be heard
12 by iO who was still on the phone. Johnny continued screaming at me, pulling my hair, striking me
13 and violently grabbing my face.

14 14. Raquel entered the condominium using the key I had previously provided to her.
15 I then escaped Johnny's grasp as he momentarily seemed distracted by Raquel's entrance.

16 15. Johnny then charged me again after I had moved to the other side of the room.
17 Raquel ran in between us and begged Johnny to stop. He then slapped away her arms that she
18 had extended in a defensive manner and continued to yell obscenities at her.

19 16. I retreated to the couch. Raquel then came over to cover me in a protectively
20 posture, while Johnny then picked up the magnum size bottle of wine he had been drinking out
21 of, and he started swinging it around, smashing everything he could.

22 17. Johnny then stormed at me once again, demanding that I get up and stand. He
23 did this – about ten times – getting closer to me, louder and more threatening each time.
24 Johnny's security team, that included, Judge Jerry, entered the condominium at this time, but they
25 stood back without saying or doing anything. I yelled to Jerry to please help me and told him that
26 if Johnny hit me one more time I was going to call the police. I heard Jerry say, "Boss, Please."
27 But Johnny continued screaming and breaking things, finally leaving the condominium.

28 18. As Johnny went down the hallway, he smashed another bottle of wine and then

2 went into the adjoining condominium unit I use as my office, painting studio and closet. I could
3 hear him destroying items of my personal property as he continued screaming.

4 19. Joshua and Raquel took me into their condominium for safety. Eventually I did not
5 hear Johnny any more.

6 20. Collectively attached hereto as **Exhibit "A"** are photographs depicting the injuries
7 to my face and the property damage caused by Johnny.

8 21. I live in fear that Johnny will return to the [REDACTED] residence unannounced to
9 terrorize me, physically and emotionally. I require the protection of this Court via the issuance
10 of Domestic Violence restraining orders. There also have been several prior incidents of
11 domestic violence with Johnny, in particular there was one severe incident in December 2015
12 when I truly feared that my life was in danger.

13 22. In addition to the DVROs I am seeking, as I have no place to live other than the
14 [REDACTED] residence (my home for the past two years), I am requesting exclusive use and
15 possession of said property. I also require exclusive use and possession of the Range Rover
16 vehicle, which I am currently using. Further, I am requesting possession of my dog Pistol.

17 23. Although Johnny is extremely wealthy, he refuses to provide me with any direct
18 financial support. Concurrent with this filing I am providing an Income and Expense Declaration.
19 I am requesting \$50,000 a month as and for *pendente lite* spousal support based on our marital
20 lifestyle.

21 24. Except as to that which is based on information and belief, I have personal
22 knowledge of the matters set forth herein and, and if sworn as a witness, I could and would
23 competently testify thereto. This declaration is being submitted in lieu of personal testimony
24 pursuant to *Code of Civil Procedure* §§ 2009 and 2015.5, *California Rules of Court*, Rule 5.118(f),
25 and *Reifler v. Superior Court* (1974) 39 Cal.App.3d 479.

26 I declare, under penalty of perjury pursuant to the laws of the State of California, that the
27 foregoing is true and correct. Executed this 26th day of May, 2016 at Los Angeles, California

28 see signature on DV-100 form
AMBER LAURA DEPP

2 **ATTACHMENT TO FORM DV-100**

3 **DECLARATION OF RAQUEL ROSE PENNINGTON**

4 I, RAQUEL ROSE PENNINGTON, declare as follows:

5 1. I have firsthand personal knowledge of the facts stated herein and if called as a
6 witness, I could and would competently testify thereto.

7 2. I submit this declaration in support of Petitioner AMBER LAURA DEPP's ("Amber")
8 Request for CLETS Domestic Violence Restraining Orders against Respondent John Christopher
9 Depp II aka Johnny Depp ("Johnny").

10 3. I have been friends with Amber since 2003. My fiancé Joshua Drew and I live in
11 one of the condominiums located at [REDACTED] in Los Angeles. I have a key to the
12 condominium units which Amber shares with Johnny.

13 4. On May 21, 2016, I was in my condominium with Joshua when I received a text
14 message from Amber at approximately 8:06 p.m., asking me to come over to her condominium
15 unit.

16 5. I immediately went over to Amber's place. When I got to the door, I could hear
17 Amber and Johnny arguing inside. I knocked on the locked door, but there was no answer, so
18 I quickly ran back to my apartment to get my key to open Amber's door.

19 6. I returned to Amber's condominium less than a minute later. When I opened the
20 door, I saw Amber by the couch in the living room covering her head with her arms and hands,
21 as Johnny was loudly screaming at her.

22 7. I ran over and stood in between Johnny and Amber, begging Johnny to stop yelling
23 at her. I put my hands out in a defensive manner motioning him to stop. Johnny slapped my
24 hands away and screamed foul obscenities at me. I then tried to covered Amber up with my body
25 to protect her from him.

26 8. Johnny picked up a magnum size bottle of wine and began swinging it like a
27 baseball bat. Wine was flying all over the walls, floors and furniture, and he began using the
28 bottle to smash everything he could.

2 9. He then charged at Amber, screaming at her to stand up. He repeatedly yelled
3 at Amber to stand up -- about ten times -- and each time, he got closer, louder and more
4 threatening.

5 10. Johnny's security team then arrived, which included Jerry Judge, but they each
6 stood back and did not say or do anything.

7 11. Amber pleaded with Jerry to help and said that if Johnny hit her one more time she
8 was going to call the police.

9 12. Jerry said "Boss. Please."

10 13. Johnny continued screaming and breaking things, before finally walking out of the
11 apartment and into the hallway where he continued screaming and breaking things.

12 14. I could hear Johnny go into Amber's private condominium, where she keeps her
13 personal belongings and artwork, and continue to scream and break things.

14 15. Joshua came into the condominium unit and together we took Amber into our
15 condominium unit for safety.

16 16. I observed that Amber sustained a significant injury to her right eye as a result of
17 the incident with Johnny, as there was redness and swelling. Amber was crying, shaking and very
18 afraid of Johnny.

19 17. Finally, I heard Johnny leave the premises. I then took pictures of Amber's face
20 which are attached as Exhibit "A" to the Declaration of Amber.

21 18. Many times over the past few years, Amber has confided and complained to me
22 about Johnny's abusing her, both physically and verbally.

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2 19. Except as to that which is based on information and belief, I have personal
3 knowledge of the matters set forth herein and, and if sworn as a witness, I could and would
4 competently testify thereto. This declaration is being submitted in lieu of personal testimony
5 pursuant to *Code of Civil Procedure* §§ 2009 and 2015.5, *California Rules of Court*, Rule 5.118(f),
6 and *Reifler v. Superior Court* (1974) 39 Cal.App.3d 479.

7 I declare, under penalty of perjury pursuant to the laws of the State of California, that the
8 foregoing is true and correct. Executed this 27th day of May, 2016 at Los Angeles, California.

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10 see facsimile signature on next page
11 RAQUEL ROSE PENNINGTON

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19. Except as to that which is based on information and belief, I have personal knowledge of the matters set forth herein and, and if sworn as a witness, I could and would competently testify thereto. This declaration is being submitted in lieu of personal testimony pursuant to *Code of Civil Procedure* §§ 2009 and 2015.5, *California Rules of Court*, Rule 5.118(f), and *Reifler v. Superior Court* (1974) 39 Cal.App.3d 479.

I declare, under penalty of perjury pursuant to the laws of the State of California, that the foregoing is true and correct. Executed this 27th day of May, 2016 at Los Angeles, California.


RAQUEL ROSE PENNINGTON





1 Laura A. Wasser, Esq. (SBN 173740)
Samantha Klein, Esq. (SBN 222414)
2 Lisa P. Sutton, Esq. (SBN 276183)
WASSER, COOPERMAN & MANDLES, P.C.
3 2049 Century Park East, Suite 800
Los Angeles, California 90067-3110
4 Telephone No.: (310) 277-7117
5 Facsimile No.: (310) 553-1793

6 Attorneys for Respondent

FILED
Superior Court of California
County of Los Angeles

MAY 27 2016

Sherri R. Gagliardi, Executive Officer/Clerk
By Manuel Almendras, Deputy

9 SUPERIOR COURT OF THE STATE OF CALIFORNIA
10 FOR THE COUNTY OF LOS ANGELES

11
12 In re the Marriage of) CASE NO. BD641052
13 Petitioner: AMBER LAURA DEPP) [Assigned to Dept. 6,
14 and) Hon. Carl H. Moor]
15 Respondent: JOHN CHRISTOPHER DEPP) **OPPOSITION TO PETITIONER, AMBER**
16 II (AKA JOHNNY DEPP)) **LAURA DEPP'S EX PARTE**
17) **APPLICATION; AND DECLARATION**
18) **OF LAURA A. WASSER, ESQ.**
19)
20) Date: May 27, 2016
21) Dept: 6
22) Time: 8:30 A.M.
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1 **MEMORANDUM OF POINTS AND AUTHORITIES**

2 Respondent, John Christopher Depp II (hereinafter "Johnny") submits the within
3 Memorandum of Points and Authorities in opposition to the ex parte application noticed by
4 Petitioner, Amber Laura Depp (hereinafter "Amber") for hearing on May 27, 2016.

5 **I.**

6 **INTRODUCTION**

7 Ex parte applications are restricted for emergency situations where substantial injury, harm,
8 or, at the very least, prejudice, would result if the matter were not either resolved immediately or on
9 shortened time. Amber is nonetheless seeking ex parte relief for several matters which do not
10 constitute an emergency, including the payment of spousal support and attorneys' fees.

11 Not only are such matters devoid of any exigency, but they are also wildly premature. This
12 case commenced this week. Amber filed her Petition for Dissolution of Marriage this Monday, May
13 23, 2016. Johnny filed his Response and Request for Dissolution of Marriage two days later, on May
14 25, 2016. No discovery has been conducted. The parties have not yet had an opportunity to even
15 informally exchange information. The Court therefore has no financial information upon which to
16 make the financial orders requested at this time. Moreover, Amber is a successful model and actress
17 who earns her own income and is capable of supporting herself. Although Amber is entitled to seek
18 support, fees, and property orders, Johnny is likewise entitled to reasonable time to prepare his
19 response.

20 Amber is attempting to secure a premature financial resolution by alleging abuse. Her current
21 application for a temporary restraining order along with her financial requests appears to be in
22 response to the negative media attention she received earlier this week after filing for divorce. Both
23 Amber and Johnny are successful actors. Amber filed her Petition three days after the death of
24 Johnny's mother. There has been significant commentary in the media as to this timing given that
25 Johnny was very close to his mother. Yet Johnny cannot protect himself or Amber from media
26 scrutiny, and Amber's anger certainly cannot drive this dissolution proceeding.

27 The actual issues in this case should be handled through properly noticed Requests for Orders
28 and settlement efforts. The issues are limited as the parties were married for little more than one

1 year and have no children together. These issues can and will be resolved. Further, Johnny is
2 willing to stipulate to mutual stay-away and personal conduct orders even though he and Amber are
3 currently on different continents, as Amber is aware. There is therefore no basis, in law or in fact,
4 upon which to issue the orders Amber seeks at this time.

5 **II.**

6 **AS A MATTER OF LAW, THE MAJORITY OF THE RELIEF REQUESTED**

7 **CANNOT BE ORDERED ON AN EX PARTE BASIS**

8 Due process requires reasonable notice and an opportunity to be heard. Accordingly, ex parte
9 orders are issued with extreme caution and only under extraordinary circumstances. California Rules
10 of Court, Rule 3.1202(c) requires that an ex parte applicant “make an affirmative factual showing in
11 a declaration containing competent testimony based on personal knowledge of irreparable harm,
12 immediate danger, or any other statutory basis for granting relief ex parte.” Amber cannot make
13 such an affirmative showing because there is no risk of irreparable harm or immediate danger upon
14 which to grant the majority of the relief she requests.

15 The majority of the relief she requests is purely financial in nature. Amber is seeking
16 payments for spousal support, attorneys’ fees, and accounting fees as well as the exclusive use and
17 possession of particular real and personal property owned by the parties. Neither the parties nor this
18 Court has any financial information upon which to grant such relief as this case commenced only
19 four days ago. Moreover, as a successful actress with significant income of her own, there is no
20 question that Amber can support herself until the parties have had a reasonable amount of time to
21 assess their finances with the assistance of counsel and then negotiate a mutually agreeable
22 resolution or seek regularly-noticed court orders.

23 **III.**

24 **ANY ISSUES FOR WHICH EX PARTE RELIEF MAY BE AVAILABLE HAVE ALREADY**

25 **BEEN RESOLVED**

26 In addition to her numerous financial requests, Amber has also requested a temporary
27 restraining order against Johnny. Johnny is currently out of the country for work. He is unable to
28 attend the hearing on this matter and has not heard Amber’s specific allegations against him. He

1 nonetheless has every intention of staying away from Amber and will stipulate to mutual stay-away
2 and personal conduct orders.

3 IV.

4 CONCLUSION

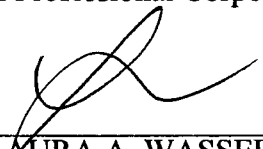
5 For all of the foregoing reasons, Johnny respectfully requests that Amber's ex parte
6 application be denied in its entirety.

7
8 DATED: May 26, 2016

Respectfully submitted,

9 WASSER, COOPERMAN & MANDLES
10 A Professional Corporation

11
12 By:


13 _____
14 LAURA A. WASSER, ESQ.
15 Attorneys for Respondent
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1 **DECLARATION OF LAURA A. WASSER, ESQ.**

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3 I, Laura A. Wasser, hereby declare as follows:

4 1. I am an attorney at law duly licensed to practice before all courts of the State of
5 California, and am a partner in the firm of Wasser, Cooperman & Mandles, P.C., attorneys of record
6 for Respondent, John Christopher Depp II (hereinafter "Johnny") herein. I have personal knowledge
7 of the following facts, and if called as a witness, I could and would competently testify thereto.

8 2. My office was retained by Johnny this month. On Monday, May 23, 2016, Petitioner,
9 Amber Laura Depp (hereinafter "Amber") filed a Petition for Dissolution of Marriage. A copy of the
10 Petition was provided to Jake Bloom, Johnny's entertainment lawyer, on Tuesday, May 24, 2016.

11 3. My office filed a Response and Request for Dissolution of Marriage on Johnny's
12 behalf on Wednesday, May 25, 2016, after advising Amber's counsel that we would be doing so.
13 Later that same day, I became aware of several reports in the media questioning the timing of
14 Amber's filing for divorce given the death of Johnny's mother only three days earlier.

15 4. On Thursday, May 26, 2016, I received ex parte notice from Amber's counsel for a
16 hearing the following day. The notice indicated that Amber would seek a temporary restraining
17 order and property control orders as well as payments for spousal support, attorneys' fees, and
18 accounting fees.

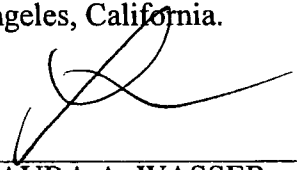
19 5. It is my understanding that Johnny is currently out of the country working in Spain for
20 the next several weeks and will not return before June 7, 2016, at the earliest. My office informed
21 Amber's counsel, prior to the ex parte notice, that Johnny was out of the country. My office
22 communicated with Amber's counsel by telephone and email throughout the day on May 26 in an
23 effort to resolve these matters.

24 6. My office has not yet had an opportunity to assess the parties' finances. Neither party
25 has served a Preliminary Declaration of Disclosure and no discovery has been conducted. My office
26 has already begun working with Johnny's business managers and accountants in order to obtain the
27 necessary financial information. We informed Amber's counsel on several occasions this week that
28 we would share financial information with them and seek to answer any questions they might have.

1 In addition, my office offered Amber's counsel the opportunity to speak with Johnny's business
2 managers on May 26 or thereafter at her convenience, so that she might begin to understand the
3 financial circumstances of this matter.

4
5 I declare under penalty of perjury under the laws of the State of California that the foregoing
6 is true and correct.

7 Executed this 26th day of May, 2016, at Los Angeles, California.

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11 LAURA A. WASSER

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