

VIRGINIA :

IN THE CIRCUIT COURT OF FAIRFAX COUNTY

JOHN C. DEPP, II

Plaintiff,

v.

AMBER LAURA HEARD

Defendant.

Civil Action No.: CL-2019-0002911

DECLARATION OF SAMANTHA MCMILLAN

I, Samantha McMillen, state as follows:

1. I am providing this declaration pursuant to a subpoena. I have first-hand, personal knowledge of the matters set forth herein and if called upon as a witness would and could competently testify thereto.

2. I am a freelance stylist, represented by the agency the Wall Group. Since approximately 2014, I have served as a stylist to Amber Heard, helping her to get ready to appear at major events.

3. On December 16, 2015, I spent much of the day and evening with Amber Heard, preparing her to appear on the James Corden show. I saw her throughout the day of December 16, 2015, in good light, at close range, wearing no makeup. Throughout the day of December 16, 2015, I could see clearly that Amber Heard did not have any visible marks, bruises, cuts, or injuries to her face or any other part of her body. She appeared as a guest on the James Corden show that day. After the show, Ms. Heard said to me "can you believe I just did that show with two black eyes?" Ms. Heard did not have any black eyes, and had been visibly uninjured

throughout the day and at that moment. I later learned that Ms. Heard had accused Johnny Depp, in court filings and the media, of violently abusing her the previous night, December 15, 2015.

4. As I was leaving Ms. Heard's company on December 16, 2015, I overheard Ms. Heard say to her friend Raquel Pennington, who came to the show with her, "make sure to get those pictures onto my computer," although I did not know to what photos she was referring.

5. Five months later, on May 24, 2016, I interacted closely with Ms. Heard in Mr. Depp's house in West Hollywood. I went to the house around noon, and encountered Amber Heard. Ms. Heard was not wearing makeup. There were no visible marks, bruises, cuts, or injuries to her face or any other part of her body. She came to me at the bottom of the staircase in Mr. Depp's house and gave me a hug, sobbing. After hugging me, she began to yell at Mr. Depp's housekeeper Hilda Vargas.

6. Three days after my encounter with Ms. Heard, on May 27, 2016, I saw in the media that Ms. Heard had gone to Court with prominent injuries visible on her face. I knew that she did not have those marks on her face May 24, 2016 when I was with her, and I knew from news reports that she claimed those injuries occurred when Mr. Depp supposedly violently abused her on May 21, 2016. I was also aware that Mr. Depp left Los Angeles on May 22, 2016. So I knew Mr. Depp could not have caused those marks that Amber Heard appeared with in court on May 27, 2016.

Executed this __ day of April, 2019 in _____, California.

I declare under the penalty of perjury under the laws of the United States of America and the State of California that the foregoing is true and correct.



Samantha McMillen