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DRAFT DECLARATION OF TRAVIS MCGIVERN

I, Travis McGivern, declare as follows:

1. I am over the age of 18, and I am not a party to this action. The facts below are personally familiar to me. If called as a witness, I would testify competently to these facts.
2. I have worked as a security guard for Johnny Depp for approximately three years. I work for him chiefly in Los Angeles, where I am based, although I have occasionally traveled with him. I have worked in the security and personal protection industry since late 2005.
3. On March 23, 2015, I was working a security shift at Johnny's residence at 849 S. Broadway, where Johnny was also staying at the time. At approximately 4:00 to 6:00 AM, Johnny texted me and asked me to come to Penthouse 5, which is 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 Johnny. When Debbie and I entered the residence, Amber and Johnny were having a verbal argument regarding Amber's suspicions about Johnny's involvement with another woman, and Amber's sister Whitney was also present. This argument lasted approximately 60 to 90 minutes. Approximately 30 to 45 minutes into argument, I witnessed Amber pick up and throw a can of Red Bull that hit Johnny in his back, and I witnessed her spit on Johnny. She also tried to throw her purse at Johnny, but I deflected it mid-air. Approximately 10 minutes before we left, I witnessed Amber punch Johnny in the eye with a closed fist.
4. I have had many opportunities to see Amber up close, and I have never seen any marks, injuries, or bruises on Amber. I understand that Amber has alleged Johnny committed an act of domestic violence prior to leaving for the Bahamas on or around December 21, 2015. I escorted the family to the airport for this trip, and to be very clear, I did not see any marks, injuries, or bruises on Amber.
5. I declare under penalty of perjury that the foregoing is true and correct and if called upon to testify I would and could do so competently.