

Subject **Declaration and Addendum to Amicus Curiae Brief**
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Since submitting my Amicus Curiae Brief in June 2020, I have recalled an additional, key segment of those events which took place at the Portland, Maine, airport, and which are highly relevant to the matters being addressed by Depp v. Heard.

While I was speaking to Heard, she directed the following, responsive statements to Johnny, to the effect of:

"I'll just claim/tell people that you hit me.... There are a number of people who will.... It happens all the time."

Heard and I were within inches of one another, while Johnny stood a few feet away from us. Because of this, combined with the fact that I was still speaking to Heard, I cannot definitively assert what Johnny had said to her; however, at that time, it was my impression that Heard was expressing her intention to threaten Johnny with her making false claims of abuse against him, if he ever did something that was against her wishes. It was shortly after that exchange that I felt prompted to inform Heard, to the effect of:

"If you ever give Johnny any [expletive for crap], I will drag you through the [expletive] mud."

Heard's initial response to me was to smirk, as though I would be powerless against her and that she would be untouchable.

If a voluntarily submitted declaration from me would be helpful, feel free to send me a copy for my signature.

As for Heard stalking me in 2016-2018, and her being the #1 suspect for the hit and run (which resulted in my having a torn ACL in my right knee), I think it would be strategically beneficial to hold that back from the Fairfax court.

Best regards,
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