

SPECIAL VERDICT FORM

Mr. Depp's Claim Against Ms. Heard

This special verdict form includes each of the statements on which **John C. Depp, II** bases his claim of defamation against **Amber Heard**. Answer the questions in accordance with the Court's instructions.

1. As to this statement appearing in the online op-ed, entitled "Amber Heard: I spoke up against sexual violence—and faced our culture's wrath. That has to change" in the *Washington Post's* online edition:

"I spoke up against sexual violence—and faced our culture's wrath. That has to change."

1(a). Do you find that Mr. Depp has proven all the elements of defamation?

ANSWER YES OR NO: _____

If you answer question 1(a) "NO," please proceed to question 2.

If you answered "YES," please answer YES or NO to the following questions: Has Mr. Depp proven by a greater weight of the evidence that:

The statement was made or published by Ms. Heard? _____

The statement was about Mr. Depp? _____

The statement was false? _____

The statement has a defamatory implication about Mr. Depp? _____

The defamatory implication was designed and intended by Ms. Heard?

Due to circumstances surrounding the publication of the statement, it conveyed a defamatory implication to someone who saw it other than Mr. Depp? _____

1(b). If you answered "YES" to each subpart of question 1(a), answer the following question: do you find that Mr. Depp has proven by **clear and convincing evidence** that Ms. Heard acted with **actual malice**?

ANSWER YES OR NO: _____

2. As to this statement appearing in the op-ed entitled "*A Transformative Moment For Women*" in the *Washington Post*'s print edition and the online op-ed "Amber Heard: I spoke up against sexual violence—and faced our culture's wrath. That has to change" in the *Washington Post*'s online edition:

"Then two years ago, I became a public figure representing domestic abuse, and I felt the full force of our culture's wrath for women who speak out."

2(a). Do you find that Mr. Depp has proven all the elements of defamation?

ANSWER YES OR NO: _____

If you answer question 2(a) "NO," please proceed to question 3.

If you answered "YES," please answer YES or NO to the following questions: Has Mr. Depp proven by a greater weight of the evidence that:

The statement was made or published by Ms. Heard? _____

The statement was about Mr. Depp? _____

The statement was false? _____

The statement has a defamatory implication about Mr. Depp? _____

The defamatory implication was designed and intended by Ms. Heard?

Due to circumstances surrounding the publication of the statement, it conveyed a defamatory implication to someone who saw it other than Mr. Depp? _____

2(b). If you answered "YES" to each subpart of question 2(a), answer the following question: do you find that Mr. Depp has proven by **clear and convincing evidence** that Ms. Heard acted with **actual malice**?

ANSWER YES OR NO: _____

3. As to this statement appearing in the op-ed entitled "*A Transformative Moment For Women*" in the *Washington Post*'s print edition and the online op-ed "Amber Heard: I spoke up against sexual violence—and faced our culture's wrath. That has to change" in the *Washington Post*'s online edition:

"I had the rare vantage point of seeing, in real time, how institutions protect men accused of abuse."

3(a). Do you find that Mr. Depp has proven all the elements of defamation?

ANSWER YES OR NO: _____

If you answer question 3(a) "NO," please proceed to question 4.

If you answered "YES," please answer YES or NO to the following questions: Has Mr. Depp proven by a greater weight of the evidence that:

The statement was made or published by Ms. Heard? _____

The statement was about Mr. Depp? _____

The statement was false? _____

The statement has a defamatory implication about Mr. Depp? _____

The defamatory implication was designed and intended by Ms. Heard?

Due to circumstances surrounding the publication of the statement, it conveyed a defamatory implication to someone who saw it other than Mr. Depp? _____

3(b). If you answered "YES" to each subpart of question 3(a), answer the following question: do you find that Mr. Depp has proven by **clear and convincing evidence** that Ms. Heard acted with **actual malice**?

ANSWER YES OR NO: _____

Complete Questions 4-5 ONLY if you answered YES to all of questions 1, 2, or 3:

4. As against **Amber Heard**, state the amount of **compensatory damages**, if any, you believe **John C. Depp, II** has proven, by a greater weight of the evidence, that he is entitled to recover:

We, the Jury, award **compensatory damages** in the amount of \$ _____.

5. As against **Amber Heard** state the amount of **punitive damages**, if any, to which you find **John C. Depp, II** is entitled to recover:

We, the Jury, award **punitive damages** in the amount of \$ _____.

DATE

SIGNATURE OF FOREPERSON

PRINTED NAME OF FOREPERSON

SPECIAL VERDICT FORM

Ms. Heard's Claim Against Mr. Depp

This special verdict form includes each of the statements on which **Amber Heard** bases her claim of defamation against **John C. Depp, II**. Answer the questions in accordance with the Court's instructions.

1. As to this statement appearing in the April 8, 2020 online edition of *The Daily Mail*:

“Amber Heard and her friends in the media use fake sexual violence allegations as both a sword and shield, depending on their needs. They have selected some of her sexual violence hoax ‘facts’ as the sword, inflicting them on the public and Mr. Depp.”

1(a). Do you find that Ms. Heard has proven all the elements of defamation?

ANSWER YES OR NO: _____

If you answer question 1(a) “NO,” please proceed to question 2.

If you answered “YES,” please answer YES or NO to the following questions: Has Ms. Heard proven by a greater weight of the evidence that:

Mr. Waldman, while acting as an agent for Mr. Depp, made or published the statement? _____

The statement was about Ms. Heard? _____

The statement was seen by someone other than Ms. Heard? _____

The statement was false? _____

1(b). If you answered “YES” to each subpart of question 1(a), answer the following question: do you find that Ms. Heard has proven by **clear and convincing evidence** that the statement by Mr. Waldman was made with **actual malice**?

ANSWER YES OR NO: _____

2. As to this statement appearing in the April 27, 2020 online edition of *The Daily Mail*:

“Quite simply this was an ambush, a hoax. They set Mr. Depp up by calling the cops but the first attempt didn’t do the trick. The officers came to the penthouses, thoroughly searched and interviewed, and left after seeing no damage to face or property. So Amber and her friends spilled a little wine and roughed the place up, got their stories straight under the direction of a lawyer and publicist, and then placed a second call to 911.”

2(a). Do you find that Ms. Heard has proven all the elements of defamation?

ANSWER YES OR NO: _____

If you answer question 2(a) “NO,” please proceed to question 2.

If you answered “YES,” please answer YES or NO to the following questions: Has Ms. Heard proven by a greater weight of the evidence that:

Mr. Waldman, while acting as an agent for Mr. Depp, made or published the statement? _____

The statement was about Ms. Heard? _____

The statement was seen by someone other than Ms. Heard? _____

The statement was false? _____

2(b). If you answered “YES” to each subpart of question 2(a), answer the following question: do you find that Ms. Heard has proven by **clear and convincing evidence** that the statement by Mr. Waldman was made with **actual malice**?

ANSWER YES OR NO: _____

3. As to this statement appearing in the April 27, 2020 online edition of *The Daily Mail*:

“[W]e have reached the beginning of the end of Ms. Heard’s abuse hoax against Johnny Depp.”

3(a). Do you find that Ms. Heard has proven all the elements of defamation?

ANSWER YES OR NO: _____

If you answer question 3(a) “NO,” please proceed to question 4.

If you answered “YES,” please answer YES or NO to the following questions: Has Ms. Heard proven by a greater weight of the evidence that:

Mr. Waldman, while acting as an agent for Mr. Depp, made or published the statement? _____

The statement was about Ms. Heard? _____

The statement was seen by someone other than Ms. Heard? _____

The statement was false? _____

3(b). If you answered “YES” to each subpart of question 3(a), answer the following question: do you find that Ms. Heard has proven by **clear and convincing evidence** that the statement by Mr. Waldman was made with **actual malice**?

ANSWER YES OR NO: _____

Complete Questions 4-5 ONLY if you answered YES to all of questions 1, 2, or 3.

4. As against **John C. Depp, II**, state the amount of **compensatory damages**, if any, you believe **Amber Heard** has proven, by a greater weight of the evidence, that she is entitled to recover:

We, the Jury, award **compensatory damages** in the amount of \$_____.

5. As against **John C. Depp, II**, state the amount of **punitive damages**, if any, you to which you find **Amber Heard** is entitled to recover:

We, the Jury, award **punitive damages** in the amount of \$_____.

DATE

SIGNATURE OF FOREPERSON

PRINTED NAME OF FOREPERSON