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JOHN T. FREY
CLERK, CIRCUIT COURT
FAIRFAX, VA

VIRGINIA :

IN THE CIRCUIT COURT OF FAIRFAX COUNTY

JOHN C. DEPP, II

Plaintiff,

v.

AMBER LAURA HEARD

Defendant.

Civil Action No.: CL-2019-0002911

**DEFENDANT'S MEMORANDUM IN SUPPORT OF HER RULE 4:10 MOTION
FOR AN INDEPENDENT MENTAL EXAMINATION OF PLAINTIFF**

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Counsel to Defendant Amber Laura Heard

Defendant Amber Laura Heard, by counsel, hereby files this Memorandum in Support of her Rule 4:10 Motion for an Independent Mental Examination (“IME”) of Plaintiff (“Motion”).

ARGUMENT & AUTHORITIES

Rule 4:10(a) of the Rules of the Supreme Court of Virginia provides that “[w]hen the mental or physical condition ...of a party...is in controversy, the court...upon motion of an adverse party, may order the party to submit to a physical or mental examination by one or more health care providers...employed by the moving party...on a motion for good cause shown.” *See, e.g.*, 1 Bryson on Virginia Civil Procedure (“Bryson”) § 9.09[2] (2019) (“[G]ood cause for the examination may appear in the pleadings, or it may...be shown by affidavits.”). Because Ms. Heard satisfies all of the requirements under Rule 4:10 and good cause supports her Motion, this Court should enter the proposed Order attached to her Motion requiring Mr. Depp to submit to a mental examination by David R. Spiegel, M.D. (“Dr. Spiegel”), a qualified health care provider, in the manner and time set forth in her Motion and proposed Order.

Mr. Depp’s Mental Condition is in Controversy & Good Cause Supports the IME

This Court has already found that Plaintiff’s “complaint is broad enough to place...[Mr. Depp’s] mental condition in issue.” Expanded Mot. to Compel Hr’g. Tr. 26:15-18, Oct. 18, 2019 (internal punctuation omitted). This finding is indisputably correct, and good cause supports Ms. Heard’s Motion for an IME.

In his Complaint, Mr. Depp repeatedly alleges that Ms. Heard submitted a “false affidavit to obtain a restraining order against Mr. Depp” in 2016 (Ms. Heard’s “2016 Declaration”). Compl. at ¶ 6; *see* Compl. at ¶¶ 2-3, 5, 30, 33, 77-78, 88-89, 99-100. Mr. Depp then alleges the *Washington Post* op-ed at issue is defamatory because it implicitly refers to Ms. Heard’s purportedly false statements in her 2016 Declaration and 2016 Request for Domestic Violence Restraining Order

which incorporated her 2016 Declaration.¹ *See, e.g., id.* at ¶¶ 2, 77, 88, 99; *see also id.* at ¶ 30 (alleging that Ms. Heard “push[ed] her false narrative that she is a domestic abuse victim...[i]n her false [2016] affidavit”); *see also id.* at ¶ 3 (same); *id.* at ¶ 33 (alleging Ms. Heard used her “false abuse allegations” in her 2016 Declaration “to obtain a temporary restraining order against Mr. Depp on May 27, 2016.”).

Plaintiff makes the same allegations in each of his claims for relief. *See, e.g., id.* Count I at ¶ 77, Count II at ¶ 88, Count III at ¶ 99 (alleging Ms. Heard’s 2016 Declaration “accus[ing] him of domestic abuse in May 2016” was false); *see also id.* Count I at ¶ 78(a), Count II at ¶ 89(a), Count III at 100(a). Thus, Mr. Depp’s defamation claims, to the extent they are even actionable, are grounded in and turn on the truth or falsity of Ms. Heard’s statements in her 2016 Declaration.

Throughout her 2016 Declaration, Ms. Heard attested to Mr. Depp’s mental condition that motivated his actions. For example, Ms. Heard stated:

- Johnny has a long-held ... history of drug and alcohol abuse. He has a short fuse. He is often paranoid and his temper is exceptionally scary for me as it has proven many times to be physically dangerous and/or life-threatening to me. Johnny[’s] relationship with reality oscillates, depending upon his interaction with alcohol and drugs. Johnny’s paranoia, delusions and aggression increased throughout our relationship so has my awareness of his continued substance abuse. Because of this, I am extremely afraid of Johnny and for my safety.... Johnny also requires enrollment in anger management courses and a Batterer’s intervention program. (Ex. 1 at ¶ 5).
- On April 21, 2016, I celebrated my birthday with my friends.... Johnny showed up, inebriated and high.... Johnny [started] throwing a magnum size bottle of champagne at the wall and a wine glass on me and the floor – both [of] which shattered. Johnny then grabbed me by the shoulders and pushed me onto the bed, blocking the bedroom door. He then grabbed me by the hair and violently shoved me to the floor. (Ex. 1 at ¶ 7) (the “April 21st Incident”).
- [O]n May 21, 2016...[Johnny] was inebriated and high.... He became extremely angry.... As Johnny continued to rant in an aggressive and incoherent manner, he demanded we call our friend iO Tillet Wright (“iO”) to prove his paranoid and

¹ The Request for Domestic Violence Restraining Order that includes Ms. Heard’s 2016 Declaration is attached hereto as **Exhibit 1**.

irrational accusations about some delusional idea he was having.... Johnny ripped the cell phone from my hand and began screaming profanities and insults at iO. I heard iO yell at me to get out of the house. Johnny then grabbed the cell phone, wound up hi[s] arm like a baseball pitcher and threw the cell phone at me striking my cheek and eye with great force.... (Ex. 1 at ¶¶ 9-12) (the “May 21st Incident”).

Mr. Depp specifically challenges the truth or falsity of the above statements and his actions, as motivated by his mental condition and substance abuse. *See generally* Compl.; *see also* Compl. at ¶ 33 (quoting and challenging the truth of Paragraphs 9-12 in Ms. Heard’s 2016 Declaration); Compl. at ¶ 30 (challenging the truth of Paragraph 7 in Ms. Heard’s Declaration); Compl. at ¶¶ 78(a), 89(a), 100(a) (challenging the truth of Ms. Heard’s allegations relating to the May 21st Incident).²

As shown above, the 2016 Declaration and Plaintiff’s Complaint, undeniably place Mr. Depp’s mental condition in controversy. Indeed, the very statements that Mr. Depp challenges in his Complaint leave no doubt that his: (i) volatility; (ii) paranoia, (iii) temper, (iv) aggressive and destructive tendencies; (v) delusional, irrational and incoherent ideations, (v) understanding of reality that “oscillates, depending upon his interaction with alcohol and drugs,” and (vi) need for anger management counseling are central to the truth or falsity of Ms. Heard’s statements at issue and to Ms. Heard’s credibility and Mr. Depp’s lack of credibility.

Mr. Depp’s mental condition, therefore, is directly at issue, and an independent mental examination is essential to assessing the truth or falsity of Ms. Heard’s statements relating to Mr. Depp’s mental condition and turbulent nature, and is equally essential to support the credibility of Ms. Heard’s account and the lack of credibility of Mr. Depp’s account of these events. *See, e.g.,*

² As she did in her 2016 Declaration, Ms. Heard alleged in this action that when Mr. Depp was under the influence of drugs and alcohol “[h]e would become a totally different person, often delusional and violent. We called that version of Johnny, ‘the Monster.’” Heard Decl. at ¶ 3 (April 10, 2019); *cf.* Compl. at ¶ 61 (disputing Ms. Heard’s “portrayal of Mr. Depp as a domestic violence perpetrator and ‘monster.’”).

Barnes v. Commonwealth, 214 Va. 24, 25-26 (1973) (reversing the trial court’s refusal to admit testimony from a hospital’s rehabilitation officer and others that the alleged aggressor was a “habitual excessive drinker” with “aggressive tendencies while intoxicated” to establish self-defense, and finding the trial court should have admitted “evidence of the [alleged aggressor’s] turbulent nature five years before...[because the jury] might have determined that his aggressive tendencies surfaced whenever he drank to excess, and, in view of the evidence of Abbott’s intoxication at the time of his death, found that Barnes’s version of the slaying was credible.”); *McMinn v. Rounds*, 267 Va. 277, 281 (2004) (finding the same admissibility rules apply in civil actions where a party’s turbulent nature and aggressive tendencies are at issue).

Based on the Ms. Heard’s Declarations and Mr. Depp’s Complaint, Ms. Heard has shown good cause for an independent mental examination. Ms. Heard, therefore, satisfies the “in controversy” and “good cause” elements under Rule 4:10(a).

Ms. Heard Satisfies All Other Elements Under Rule 4:10(a)

Because Ms. Heard has shown that Mr. Depp’s mental condition is in controversy and good cause supports an IME of Mr. Depp, Ms. Heard filed her Motion requesting an IME performed by Dr. Spiegel in the manner and time set forth in her Motion. Counsel for Ms. Heard has likewise provided notice and conferred with counsel for Mr. Depp on her Motion for an IME of Plaintiff.

Dr. Spiegel is Qualified to Conduct the IME & His Selection Is Appropriate

Dr. Spiegel is a board-certified psychiatrist licensed by the Virginia Board of Medicine and in good standing. Dr. Spiegel has been continuously licensed in Virginia since 1993 and has more than 25 years of experience in his field and as an active clinical practitioner. Dr. Spiegel completed his undergraduate degree at Duke University in 1985 and his medical degree at SUNY Downstate-Brooklyn in 1989. He completed his psychiatry internship at Dartmouth-Hitchcock Medical

Center and his psychiatry residency at Penn State College of Medicine. Since 2013, Dr. Spiegel has been the Vice Chairman of the Department of Psychiatry and Behavioral Sciences at Eastern Virginia Medical School/Sentara Norfolk General Hospital and a Professor of Clinical Psychiatry there. Since 2004, Dr. Spiegel has been the Director of Consultation and Liaison Service at Eastern Virginia Medical School/Sentara Norfolk General Hospital. Dr. Spiegel has authored more than 60 publications and is a member of numerous professional organizations, including the Psychiatric Society of Virginia and the Medical Society of Virginia, and he is a Fellow of the American Psychiatric Association. Dr. Spiegel's Curriculum Vitae is attached hereto as Exhibit 2. Dr. Spiegel, therefore, is well-qualified to conduct the IME.

Dr. Spiegel is the appropriate health care provider to perform the IME. Under Virginia law, Defendant's selection of a qualified health care provider is preferred because "[i]t is appropriate for the adverse party to have a physician of his own choice; this guarantees the equal opportunity to examine the medical condition in controversy[, and] [t]he examinee can always select his own medical expert." Bryson § 9.09[2] (2019) ("Usually the physician named by the judge in his or her order is the one nominated by the moving party, and this is the preferred procedure.") (citing cases).³

³ Dr. Spiegel's examination should be conducted without the presence of third parties or recording devices. See, e.g., *Fields v. Walke*, 1 Va. Cir. 96, 97 (Richmond Cir. Ct. 1969) (relying on federal authorities applying Fed. R. Civ. P. 35); *Morrison v. Stephenson*, 244 F.R.D. 405, 407 (S.D. Ohio 2007) ("[T]he normal procedure...is that the examination take place without the presence of third-party observers or recording devices."); 8B Fed. Practice & Procedure, §2236, at 292-93 ("[T]he presence of, and possible interference by, an attorney or other representative of the examined party might disrupt, or defeat the purpose of, the examination. This concern may be heightened during a psychiatric examination."); *Holland v. United States*, 182 F.R.D. 493,496 (D.S.C. 2013) (Allowing opposing party oversight of physical examination "would give Plaintiffs an evidentiary tool unavailable to Defendant, who has not been privy to physical examination made of [plaintiff] by either his treating physicians or any experts he may have retained."); See also Policy Statement on the Presence of Third Party Observers in Neuropsychological Assessments, *The Clinical Neuropsychologist* (2001), available at <https://doi.org/10.1076/clin.15.4.433.1888> (rejecting electronic or physical presence of third-parties during mental exams as a matter of policy).

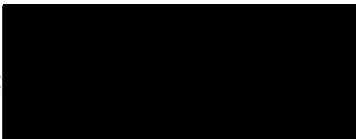
CONCLUSION

WHEREFORE, Ms. Heard respectfully requests that this Court grant her Motion and enter an Order requiring Mr. Depp to submit to a mental examination by David R. Spiegel, M.D. in the manner and time set forth in her Motion.

Dated this 1st day of November, 2019

Respectfully submitted,
Amber L. Heard

By Counsel:


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CERTIFICATE OF SERVICE

I certify that on this 1st day of November 2019, a copy of the foregoing shall be served by first class mail, postage prepaid, and by email, upon:

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Exhibit 1

DV-100

Request for Domestic Violence Restraining Order

You must also complete Form CLETS-001, Confidential CLETS Information, and give it to the clerk when you file this Request.

1 Name of Person Asking for Protection:

AMBER LAURA DEPP Age: 30

Your lawyer in this case (if you have one):

Name: SAMANTHA F. SPECTOR, ESQ. State Bar No.: (SBN 204482)

Firm Name: SPECTOR LAW, A PROFESSIONAL LAW CORPORATION

Address (If you have a lawyer for this case, give your lawyer's information. If you do not have a lawyer and want to keep your home address private, give a different mailing address instead. You do not have to give your telephone, fax, or e-mail.):

Address: 1925 CENTURY PARK EAST, SUITE 200

City: LOS ANGELES, CALIFORNIA State: Zip:

Telephone: (310) 282-9478 Fax: (310) 220-3889

E-Mail Address: SS@SPECTORLAWFIRM.COM

2 Name of Person You Want Protection From:

JOHN CHRISTOPHER DEPP, II (AKA JOHNNY DEPP)

Description of person you want protection from:

Sex: M F Height: 5'10" Weight: 175 Hair Color: Black Eye Color: Brown

Race: White Age: 52 Date of Birth:

Address (if known):

City: State: Zip:

3 Do you want an order to protect family or household members? Yes No

If yes, list them:

Full Name	Sex	Age	Lives with you?	Relationship to you
			<input type="checkbox"/> Yes <input type="checkbox"/> No	
			<input type="checkbox"/> Yes <input type="checkbox"/> No	
			<input type="checkbox"/> Yes <input type="checkbox"/> No	

Check here if you need more space. Attach a sheet of paper and write "DV-100, Protected People" for a title.

4 What is your relationship to the person in (2)? (Check all that apply):

- a. We are now married or registered domestic partners.
- b. We used to be married or registered domestic partners.
- c. We live together.
- d. We used to live together.
- e. We are related by blood, marriage, or adoption (specify relationship):
- f. We are dating or used to date, or we are or used to be engaged to be married.
- g. We are the parents together of a child or children under 18:

If you do not have one of these relationships, the court may not be able to consider your request. Read DV-500-INFO for help.

Child's Name: Date of Birth:

Child's Name: Date of Birth:

Child's Name: Date of Birth:

Check here if you need more space. Attach a sheet of paper and write "DV-100, Protected People" for a title.

- h. We have signed a Voluntary Declaration of Paternity for our child or children. (Attach a copy if you have one).

This is not a Court Order.

Clerk stamps date here when form is filed.

CONFORMED COPY
ORIGINAL FILED
Superior Court of California
County of Los Angeles

MAY 27 2013

Sherr R. Carter, Executive Officer/Clerk
By Gestelle Gammage, Deputy

Fill in court name and street address:

Superior Court of California, County of
LOS ANGELES
111 NORTH HILL STREET
111 NORTH HILL STREET
LOS ANGELES, CA 90012
CENTRAL

Court fills in case number when form is filed.

Case Number:
BD 641 052



5 Other Court Cases

a. Have you or any other person named in ③ been involved in another court case with the person in ②?

No Yes *If yes, check each kind of case and indicate where and when each was filed:*

Kind of Case	County or Tribe Where Filed	Year Filed	Case Number (if known)
<input checked="" type="checkbox"/> Divorce, Nullity, Legal Separation	LASC	2016	BD 641 052
<input type="checkbox"/> Civil Harassment			
<input type="checkbox"/> Domestic Violence			
<input type="checkbox"/> Criminal			
<input type="checkbox"/> Juvenile, Dependency, Guardianship			
<input type="checkbox"/> Child Support			
<input type="checkbox"/> Parentage, Paternity			
<input type="checkbox"/> Other (specify): _____			
<input type="checkbox"/> Check here if you need more space. Attach a sheet of paper and write "DV-100, Other Court Cases" for a title.			

b. Are there any domestic violence restraining/protective orders now (criminal, juvenile, family)?

No Yes *If yes, attach a copy if you have one.*

Check the orders you want.

6 Personal Conduct Orders

I ask the court to order the person in ② not to do the following things to me or anyone listed in ③:

- a. Harass, attack, strike, threaten, assault (sexually or otherwise), hit, follow, stalk, molest, destroy personal property, disturb the peace, keep under surveillance, impersonate (on the Internet, electronically or otherwise), or block movements
- b. Contact, either directly or indirectly, in any way, including but not limited to, by telephone, mail or e-mail or other electronic means

The person in ② will be ordered not to take any action to get the addresses or locations of any protected person unless the court finds good cause not to make the order.

7 Stay-Away Order

a. I ask the court to order the person in ② to stay at least 100 yards away from (check all that apply):

- Me My vehicle
- My home The child(ren)'s school or child care
- My job or workplace Each person listed in ③
- My school Other (specify): _____

b. If the person listed in ② is ordered to stay away from all the places listed above, will he or she still be able to get to his or her home, school, job, workplace, or vehicle? Yes No (If no, explain): _____

8 Move-Out Order

(If the person in ② lives with you and you want that person to stay away from your home, you must ask for this move-out order.)

I ask the court to order the person in ② to move out from and not return to (address):

849 S. Broadway Avenue, Los Angeles, CA 90014

I have the right to live at the above address because (explain): _____

marital residence

This is not a Court Order.

9 Guns or Other Firearms and Ammunition

I believe the person in (2) owns or possesses guns, firearms, or ammunition. Yes No I don't know
If the judge approves the order, the person in (2) will be ordered not to own, possess, purchase or receive a firearm or ammunition. The person will be ordered to sell to, or store with, a licensed gun dealer, or turn in to law enforcement, any guns or firearms that he or she owns or possesses.

10 Record Unlawful Communications

I ask for the right to record communications made to me by the person in (2) that violate the judge's orders.

11 Care of Animals

I ask for the sole possession, care, and control of the animals listed below. I ask the court to order the person in (2) to stay at least 100 yards away from and not take, sell, transfer, encumber, conceal, molest, attack, strike, threaten, harm, or otherwise dispose of the following animals: _____

Pistol, Yorkshire Terrier

I ask for the animals to be with me because: It is my pet.

12 Child Custody and Visitation

a. I do not have a child custody or visitation order and I want one.

b. I have a child custody or visitation order and I want it changed.

If you ask for orders, you must fill out and attach Form DV-105, Request for Child Custody and Visitation Orders.

You and the other parent may tell the court that you want to be legal parents of the children (use Form DV-180, Agreement and Judgment of Parentage).

13 Child Support (Check all that apply):

a. I do not have a child support order and I want one.

b. I have a child support order and I want it changed.

c. I now receive or have applied for TANF, Welfare, CalWORKS, or Medi-Cal.

If you ask for child support orders, you must fill out and attach Form FL-150, Income and Expense Declaration or Form FL-155, Financial Statement (Simplified).

14 Property Control

I ask the court to give *only* me temporary use, possession, and control of the property listed here:

Real property located at 849 S. Broadway Avenue, Los Angeles, CA 90014

15 Debt Payment

I ask the court to order the person in (2) to make these payments while the order is in effect:

Check here if you need more space. Attach a sheet of paper and write "DV-100, Debt Payment" for a title.

Pay to: _____ For: _____ Amount: \$ _____ Due date: _____

16 Property Restraint

I am married to or have a registered domestic partnership with the person in (2). I ask the judge to order that the person in (2) not borrow against, sell, hide, or get rid of or destroy any possessions or property, except in the usual course of business or for necessities of life. I also ask the judge to order the person in (2) to notify me of any new or big expenses and to explain them to the court.

This is not a Court Order.

17 **Spousal Support**

I am married to or have a registered domestic partnership with the person in ② and no spousal support order exists. I ask the court to order the person in ② to pay spousal support. *(You must complete, file, and serve Form FL-150, Income and Expense Declaration, before your hearing).*

18 **Insurance**

I ask the court to order the person in ② NOT to cash, borrow against, cancel, transfer, dispose of, or change the beneficiaries of any insurance or coverage held for the benefit of me or the person in ②, or our child(ren), for whom support may be ordered, or both.

19 **Lawyer's Fees and Costs**

I ask that the person in ② pay some or all of my lawyer's fees and costs.
You must complete, file, and serve Form FL-150, Income and Expense Declaration, before your hearing.

20 **Payments for Costs and Services**

I ask the court to order the person in ② to pay the following:
You can ask for lost earnings or your costs for services caused directly by the person in ② (damaged property, medical care, counseling, temporary housing, etc.). You must bring proof of these expenses to your hearing.

Pay to: _____ For: _____ Amount: \$ _____

Pay to: _____ For: _____ Amount: \$ _____

21 **Batterer Intervention Program**

I ask the court to order the person listed in ② to go to a 52-week batterer intervention program and show proof of completion to the court.

22 **Other Orders**

What other orders are you asking for? 52-weeks of anger management courses.

Check here if you need more space. Attach a sheet of paper and write "DV-100, Other Orders" for a title.

23 **Time for Service (Notice)**

The papers must be personally served on the person in ② at least five days before the hearing, unless the court orders a shorter time for service. If you want there to be fewer than five days between service and the hearing, explain why below. For help, read Form DV-200-INFO, "What Is Proof of Personal Service?"

24 **No Fee to Serve (Notify) Restrained Person**

If you want the sheriff or marshal to serve (notify) the restrained person about the orders for free, ask the court clerk what you need to do.

25 **Court Hearing**

The court will schedule a hearing on your request. If the judge does not make the orders effective right away ("temporary restraining orders"), the judge may still make the orders after the hearing. If the judge does not make the orders effective right away, you can ask the court to cancel the hearing. Read Form DV-112, *Waiver of Hearing on Denied Request for Temporary Restraining Order*, for more information.

This is not a Court Order.

26 Describe Abuse

Describe how the person in (2) abused you. Abuse means to intentionally or recklessly cause or attempt to cause bodily injury to you; or to place you or another person in reasonable fear of imminent serious bodily injury; or to harass, attack, strike, threaten, assault (sexually or otherwise), hit, follow, stalk, molest, keep you under surveillance, impersonate (on the Internet, electronically or otherwise), batter, telephone, or contact you; or to disturb your peace; or to destroy your personal property. (For a complete definition, see Fam. Code, §§ 6203, 6320.)

a. Date of most recent abuse: 5/21/2016

b. Who was there? Self, respondent

c. Describe how the person in (2) abused you or your child(ren):
See attached Declaration of Petitioner Amber Laura Depp

Check here if you need more space. Attach a sheet of paper and write "DV-100, Recent Abuse" for a title.

d. Did the person in (2) use or threaten to use a gun or any other weapon? No Yes (If yes, describe):

e. Describe any injuries: See attached Declaration and Exhibits

f. Did the police come? No Yes

If yes, did they give you or the person in (2) an Emergency Protective Order? Yes No I don't know
Attach a copy if you have one.

The order protects you or the person in (2)

g. Has the person in (2) abused you (or your children) other times?

If yes, check here and use Form DV-101, Description of Abuse or describe any previous abuse on an attached sheet of paper and write "DV-100, Previous Abuse" for a title.

27 Other Persons to Be Protected

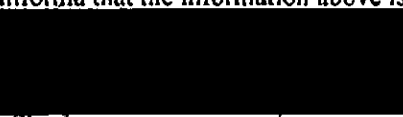
The persons listed in item (3) need an order for protection because (describe): _____

28 Number of pages attached to this form, if any: _____

I declare under penalty of perjury under the laws of the State of California that the information above is true and correct.

Date: May 26, 2016

AMBER LAURA DEPP
Type or print your name



Sign your name

Date: May 26, 2016

SAMANTHA F. SPECTOR, ESQ.
Lawyer's name, if you have one



Lawyer's signature

This is not a Court Order.

**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 849 S. Broadway 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 Broadway 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 Broadway
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 Broadway
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 Broadway 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 forcefully 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 protective
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 Broadway 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 Broadway 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

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DECLARATION OF AMBER LAURA DEPP

Exhibit 2

Eastern Virginia Medical School Curriculum Vitae

David R. Spiegel, MD
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Norfolk VA 23507
(757)446-5888
(757) 446-5918
spiegedr@evms.edu

Personal Contact Information

409B 341/2 ST.
Virginia Beach, VA 23451
757-227-3257
davidshrink@aol.com

Education

Penn State College of Medicine, Hershey PA	07/1991-06/1993
Dartmouth –Hitchcock Medical Center, Lebanon NH	07/1989-06/1991
M.D., SUNY Downstate College of Medicine, Brooklyn NY	08/1985-05/1989
B.S. in Psychology, Duke University, Durham NC	08/1981-05/1985

Current Administrative Position

Professor and Vice Chairman of Psychiatry and Behavioral Sciences Eastern Virginia Medical School Norfolk, VA	07/2013 - present
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Academic Appointments

Associate Professor Department of Psychiatry and Behavioral Sciences Eastern Virginia Medical School Norfolk, VA	2007-2013
Assistant Professor Department of Psychiatry and Behavioral Sciences Eastern Virginia Medical School Norfolk, VA	2001-2007

Clinical Practice:

<u>Inpatient:</u> Chesapeake General Hospital	1993-2001
Norfolk General Hospital	2001-present
<u>Outpatient:</u> Psychiatric Associates of Chesapeake	1993-2001
Eastern Virginia Medical School: Health Services	2001-present

Both inpatient and outpatient practices involve new and follow-up comprehensive evaluations, which include history, mental status examination, diagnoses, and treatment planning. Follow-up evaluations also provides psychotherapeutic skills/counseling. Both inpatient and outpatient clinical practices are performed on a daily basis. The above encompasses about 85-90% of my daily workload.

Professional Experience and Other Employment

Member of Editorial Board for journals, "Clinical Neuropharmacology"; "Innovations in Clinical Neuroscience"	2015-present 2018-present
Director- Consultation-Liaison Service Eastern Virginia Medical School/ Sentara Norfolk General Hospital Norfolk, VA	2004 – present
Medical Director-Older Adult Behavioral Health Services Chesapeake Regional Medical Center Chesapeake, VA	1996-2000
Attending Psychiatrist Chesapeake Regional Medical Center Chesapeake, VA	1993-2001

Certification and Licensure

Diplomat, American Board of Psychiatry and Neurology (ABPN) /Psychiatry	1993-present
Consultation Liaison Psychiatry, ABPN	2008-present
Virginia- Medical License (Active)	1993-present

Honors and Awards

EVMS Foundation Chair in Psychiatry	2016 - present
Coastal Virginia Magazine, Top Doc	2014 - present
Member, Alpha Omega Alpha Medical Honor Society	2014 - present
Instructor of the Year: EVMS Psychiatry Residents	2004, 2009, 2013 and 2017
Resident's Choice Award: EVMS Psychiatry Residents	2007
o Sir William Osler Award for Outstanding Physician: Class of 2018	2018
o IMPACT award-Class of 2018	2018
o Crystal Apple Award-EVMS Student Government Association	2018
o Faculty Award for Excellence, nominee	2019

Professional Memberships

Fellow, American Psychiatric Association	2017 - present
Member, American Psychiatric Association	2001 -present
Member, Psychiatric Society of Virginia	2001 - present
▪ Member, Medical Society of Virginia	2001 - present
▪ Member, Tidewater Academy of Psychiatry	2014-present
Member, Academy of Consultation and Liaison Psychiatry	2010-present

Professional Service

Regional

Board Member, Psychiatric Society of Virginia 2014 - present

Local

President, Tidewater Academy of Psychiatry 2014 - present

Member, Physician's Advisory Committee-Beth Shalom Home of Eastern Virginia 2001 - 2006

Member, Quality Assurance Committee- Beth Shalom Home of Eastern Virginia 2001 - 2006

EVMS

Member, EVMS Admissions Committee 2013 – present

Member, EVMS Faculty Senate 2007 - 2018

Member, EVMS/SNGH Inpatient Behavioral Health Committee 2004 - present

Member, EVMS Residency Training Committee 2002 - present

Member, EVMS Residency Curriculum Committee 2001 - present

Member, EVMS Medical Group Finance, Audit, and Compliance Committee Meeting 2019- present

Educational Activities

Co-Director/Lecturer: M2 Students Brain, Mind, Behavior Module/Behavioral Sciences II- Psychopathology 2012 -Present

Director: Psychiatry Consultation-Liaison Service-3rd year clinical clerkship 2004-present

Director: M4 Students Psychiatry Electives 2009-present

Lecturer: M3 students Psychiatry Clerkship (Psychopharmacology/Mood Disorders) 2008-present

Lecturer, Psychiatric Emergencies, EVMS Internal Medicine Residents 2011-2018

Lecturer, M2 students: MED204 Synthesis Course 2017-present

Lecturer, M1 students, GI and Metabolism Module: Eating Disorders Lecture 2017-present

Lecturer, M4 students, Last Lecture 2017-present

Lecturer, M3 OB/GYN Clerkship: Post-Partum Depression, Premenstrual Dysphoric Disorder 2010-2019

Grants and Contract Awards

Present Funded

Principal Investigator	% effort	Grant Period	Total amount (Direct costs)	Source of funding
Evaluation of EEG-Based Neurometrics and Visual Paired Comparison Task Measure for the Evaluation of Cognitive Decline in Patients at Risk for Alzheimer's Disease Task Measures				

Ohkravi H (PI) Spiegel DR (CoPI)	1 Year	\$25,000	Norfolk Community Foundation
Evaluation of EEG-Based Neurometrics and Visual Paired Comparison Task Measure for the Evaluation of Cognitive Decline in Patients at Risk for Alzheimer's Disease Task Measures.			
Ohkravi H (PI) Spiegel DR (CoPI)	1 Year	\$9,000	Neurotrack Inc.

Past Funded

Principal Investigator	% effort	Grant Period	Total amount (Direct costs)	Source of funding
Mental Health Functioning of Adolescents in Juvenile Detention Facilities: Linking Mental Health Services to Evaluation Results for Adolescents in the Juvenile Justice System.				
Archer R. (Handel R, Spiegel D.)		1 Year	\$23,800	Norfolk Foundation
Evaluation of EEG-Based Neurometrics and Visual Paired Comparison Task Measure for the Evaluation of Cognitive Decline in Patients at Risk for Alzheimer's Disease Task Measures				
Urbano, M. (Spiegel, D.)		1 Year	\$17,000	Norfolk Foundation.

Publications

1. McDaniel, W., **Spiegel, D.**, and Kaur, A. "Topiramate Effect in Catatonia: Case Series" *Journal of Neuropsychiatry and Clinical Neurosciences* 2006, 18:234-238,
2. Babington P, and **Spiegel D.** "Treatment of Catatonia with Olanzapine and Amantadine," (Case Report) *Psychosomatics*. November-December 2007 48: 534-536.
3. Brown S, **Spiegel D**, Vyas B. "Mania in a Case of Hyperparathyroidism" (Case Report): *Psychosomatics* 2007, 48:2.
4. Camden J. and **Spiegel D.** "Case Study: Manic Behavior from Left Frontal Closed Head Injury in an Adult with Fetal Alcohol Syndrome," *Psychosomatics* Set-Oct, 2007: 48 :(5): 433-435.
5. Carroll, B et.al. (Including **Spiegel, D.**). "Review of Adjunctive Glutamate Antagonist Therapy in the Treatment of Catatonic Syndromes": *The Journal of Neuropsychiatry and Clinical Neurosciences*. Fall, 2007: 19 :(4).
6. **Spiegel D** and Leader M. "Psychosis Induced by the Interaction of Memantine and Amantadine: Lending Evidence to the Glutamatergic Theory of Schizophrenia" *Clinical Schizophrenia & Related Psychoses*. October, 2007: 1(3), 273-276.
7. Urbano M., **Spiegel D.**, and Rai A. Frequency of Withdrawal Dyskinesia in Atypical Antipsychotic Medications. *Journal of Clinical Psychopharmacology*. 2007 Dec; 27(6):705-7.
8. Foster M, and **Spiegel D.** "Use of Donepezil in Treating the Cognitive Impairments of Moderate Traumatic Brain Injury" (Letter to the Editor): *The Journal of Neuropsychiatry and Clinical Neurosciences*. 2008 20: 106.
9. Graham K., and **Spiegel D.** "Pseudobulbar Palsy and Affect in a Case of Progressive Multifocal Leukoencephalopathy," (Letter to the Editor): *The Journal of Neuropsychiatry and Clinical Neurosciences*. 2008; 20: 110-111.
10. Harvey, H., Hayashi J., and **Spiegel D.** "Adjunctive Usage of Beta Agonists in the Treatment of Panic Disorder and Chronic Obstructive Pulmonary Disease," (Letter to the Editor): *Psychosomatics*: November-December 2008.
11. **Spiegel D.**, Babington P., Abcarian A., and DeFilipo C. The Differential Diagnosis of Excessive Daytime Sleepiness & Cognitive Deficits in a Patient with Delirium, Schizophrenia, & Possible Narcolepsy: A Case Report". *Clinical Schizophrenia and Related Psychoses*. October 2008: 255-258.
12. **Spiegel D.**, Casella, D., Callender D., and Dhadwal N. Treatment of Akinetic Mutism with Intramuscular Olanzapine: A Case Series. *The Journal of Neuropsychiatry and Clinical Neurosciences*. 2008; 20: 93-95.
13. **Spiegel D.**, Dhadwal N., and Gill F.: "I'm Sober, Doctor, Really": Best Biomarkers for Underreported Alcohol Use. *Current Psychiatry* 2008. 7(9): 15-27.
14. **Spiegel D**, Laroia R. and Samuels D.: A Possible Case of Capgras Syndrome after a Right Anterior Cerebral Artery Cerebrovascular Accident Treated Successfully with Mirtazapine. *The Journal of Neuropsychiatry and Clinical Neurosciences*. *J Neuropsychiatry Clin Neurosci*. 2008 Fall; 20(4):494.
15. **Spiegel, D.** and West, S.: Successful Treatment of Megaloblastic Mania with Cobalamin in a Patient with Pernicious Anemia. *Clinical Schizophrenia and Related Psychosis*. July 2008. 155-157.

16. Weiss G and **Spiegel D.** "Transient Amnesic Syndrome in the Setting of Recurrent Partial Elementary Seizures" (Letter to the Editor): *The Journal of Neuropsychiatry and Clinical Neurosciences*. 2008; 20: 115-116.
17. **Spiegel D.**, Burgess J., and Laroia R., et al.: Disinhibition due to Disruption of the Orbitofrontal Circuit Treated Successfully with Carbamazepine: A Case Series. *The Journal of Neuropsychiatry and Clinical Neurosciences*. 21:3 Summer 2009.
18. **Spiegel D.** and Finklea L.: The Recognition and Treatment of Pathological Skin Picking: A Potential Neurobiological Underpinning of the Efficacy of Pharmacotherapy in Impulse Control Disorders. *Psychiatry*: 2009. 6(2): 38-42.
19. **Spiegel, D.**, Kim, J., Greene K., Conner, C. and Zamfir D.: "Apathy due to Cerebrovascular Accidents Successfully Treated with Methylphenidate: A Case Series". *The Journal of Neuropsychiatry and Clinical Neurosciences*. Spring 2009 21:2.
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21. **Spiegel D.** and Ramdath N.: A Failed Case of Weaning from a Mechanical Ventilator with Lorazepam Successfully Accomplished by Ziprasidone. *General Hospital Psychiatry*. Volume 31, Issue 5, September-October 2009, Pages 494-496.
22. **Spiegel D**, Thomas C, Shah P, and Kent KD. A Possible Case of Mixed Mania due to Neurosarcoidosis Treated Successfully with Methylprednisolone and Ziprasidone: Another Example of Frontal-Subcortical Disinhibition? *Gen Hosp Psychiatry*. 2010 May-Jun; 32(3):342.e1-3. Epub 2009 Sep 11.
23. Urbano M., **Spiegel D**, Rai A., et al.: Gabapentin and tiagabine for social anxiety: a randomized, double-blind, crossover study of 8 adults. *Prim Care Companion J Clin Psychiatry*. 2009; 11(3):123.
24. Archer RP, Simonds-Bisbee EC, **Spiegel DR**, Handel RW and Elkins D.: Validity of the Massachusetts Youth Screening Instrument-2 (MAYSI-2) Scales in Juvenile Justice Settings. *Journal of Personality Assessment*. 2010; 92(4): 337-348.
25. McDaniel WW and **Spiegel DR.**: Hyponatremia and Abnormal Ingestion of Water in Catatonia. *Primary Psychiatry*. 2010 April; 17(4): 29-34.
26. **Spiegel DR**, Bayne C, Wilcox L and Somova M. A Case of Mania due to Cryptococcal Meningitis, Successfully Treated with Adjunctive Olanzapine, in a Patient with Acquired Immunodeficiency Syndrome. *General Hospital Psychiatry*. 2011 May-Jun; 33(3):301.e3-6. Epub 2010 Dec 22.
27. **Spiegel D**, Holtz L, and Chopra K.: A Case of Mania in a Patient with Systemic Lupus Erythematosus: Can Its Inflammatory Pathogenesis be Applied to Primary Mood Disorders? *Psychiatry (Edgmont)*. 2010 Apr; 7(4):31-6.
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30. **Spiegel D.**, Turner K., Pennell K., et al.: The Successful Treatment of Mania due to Acquired Immunodeficiency Syndrome Using Ziprasidone: A Case Series. *The Journal of Neuropsychiatry and Clinical Neurosciences*. 22:1 Winter 2010.

31. **Spiegel D.** and Qureshi N.: The Successful Treatment of Disinhibition due to a Possible Case of Non-Human Immunodeficiency Virus Neurosyphilis: A Proposed Pathophysiological Explanation of the Symptoms and Treatment. *General Hospital Psychiatry*. 2010 Mar-Apr; 32(2):221-4.
32. **Spiegel D** and Alexander G.: A Case of Nonfluent Aphasia Treated Successfully with Speech Therapy and Adjunctive Mixed Amphetamine Salts. *The Journal of Neuropsychiatry and Clinical Neurosciences*. 2011 Fall; 23(1):E24.
33. **Spiegel D**, Barber J, and Somova M.: A Potential Case of Peduncular Hallucinoses Treated Successfully with Olanzapine. *Clinical Schizophrenia & Related Psychoses*. April 2011; 5(1):50-53.
34. **Spiegel DR** and Kolb R. Treatment of Irritable Bowel Syndrome with Comorbid Anxiety Symptoms with Mirtazapine. *Clinical Neuropharmacology. Clin Neuropharmacol*. 2011 Jan-Feb; 34(1):36-8.
35. **Spiegel DR** and Lamm K. A Case of Utilization Behavior and Hyperorality following Bilateral Anterior Cerebral Artery Infarct Partially Responsive to Carbamazepine: Can Both Behaviors be attributed to Lesions in Different Frontal Lobe Circuits? *Psychosomatics* 2011;52:563–567.
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39. **Spiegel DR** and Varnell C. A Case of Catatonia due to Posterior Reversible Encephalopathy Syndrome Treated Successfully with Olanzapine. *General Hospital Psychiatry*. 2011 May-Jun; 33(3):302.e3-5. Epub 2011 Feb 26.
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43. **Spiegel DR**, Morris K and Rayamajhi U. A Review of Neurosarcoidosis and the Complexity in its Differential Diagnoses. *Innovations in Clinical Neuroscience*. April 2012.
44. **Spiegel DR**, Messerschmidt C, Morewitz J, and Akintola M. A Case of Recurrent Psychosis during Sickle Cell Disease crisis Treated Successfully with Ziprasidone. *Clinical Schizophrenia Related Psychoses*. Jan 2013.
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49. **Spiegel DR**, Cadacio K, and Kiamanesh M. A Probable Case of Reduplicative Paramnesia Status-Post Right Fronto-Temporal Cerebrovascular Accident, Treated Successfully with Risperidone. *Journal of Neuropsychiatry Clinical Neuroscience*. Winter 2014.
50. **Spiegel DR**, Chatterjee A. A case of abulia, status/post right middle cerebral artery territory infarct, treated successfully with olanzapine. *Clin Neuropharmacol*. 2014 Nov-Dec;37(6):186-9
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52. **Spiegel DR**, McCroskey AL, Chatterjee A, Ahmadi T, Simmelink D, Oldfield EC, Pryor CR, Faschan M, Raulli O. A Review of Select Centralized Pain Syndromes: Relationship with Childhood Sexual Abuse, Opiate Prescribing and Treatment Implications for the Primary Care Physician. *Health Services Research and Managerial Epidemiology*. 2015.
53. **Spiegel DR**, Shaukat AM, McCroskey AL, Chatterjee A, Ahmadi T, Simmelink D, Oldfield EC, Pryor CR, Faschan M, Raulli O. Conceptualizing a subtype of patients with chronic pain: The necessity of obtaining a history of sexual abuse. *Int J Psychiatry Med*. 2016; 51(1):84-103.
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55. **Spiegel DR**, McCroskey AL, Puaa, K, et al. A Case of Disulfiram Induced Psychosis in a Previously Asymptomatic Patient Maintained on Mixed Amphetamine Salts: A Review of the Literature and Possible Pathophysiological Explanations. *Clinical Neuropharmacol*. 2016 Sep-Oct; 39(5):272-5.
56. **Spiegel DR**, Carroll B., et al. Review of Pharmacotherapy in the Treatment of the Catatonic Syndrome: First-Line, Adjunctive/Combination and Novel Options. *Medical Research Archives*. 2016 November; 4(7): 1-9.
57. **Spiegel DR.**, et al. A Likely Case of Limbic Encephalitis in a Patient with Voltage Gated Potassium Channel Complex Antibody, Without a Known Antigenic Target: A Review of the Disease State and Value of Antibody Titers. *Psychosomatics*. 2017 Nov - Dec; 58(6):669-67
doi:10.1016/j.psych.2017.05.006. Epub 2017 Jun 1.
58. **Spiegel DR.**, Warren A., Takaura, W., Servidio, L., Leu, N. Disorders of diminished motivation: What are they and how to treat them. *Current Psychiatry* 2018 January; 17(1):10-18, 20.
59. **Spiegel DR.**, Nelson, AB., Lieb, DC., Pattison, A., Smith, JR., Zigrossi, P., Godbout, E. A Case of Psychosis in a Patient with Secondary Adrenal Insufficiency: A Possible Etiological Role of a Hypocortisolemic-Induced Increase in Proinflammatory Cytokines. *Innovations in Clinical Neuroscience*. 2017 Sep-Oct; 14(9-10): 4–10. Published online 2017 Oct 1

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Oral Presentations, Symposia

National/International Meetings

Seminar – Practical Guide to the Performance of the Mental Status Examination, Annual Meeting Of the American Psychiatric Association, Honolulu, HI 2011

Local/Regional Meetings

The Medical Management of Acute Agitation: What Comes After “Look Out”, Grand Rounds Presentation to Department of Internal Medicine, Eastern Virginia Medical School, Norfolk VA. 2012

Adult Attention Deficit Hyperactivity Disorder: Challenges in its Diagnosis and Treatment Tidewater Academy of Psychiatry Quarterly Meeting, Norfolk VA. 2014

Bipolar Disorder: What it is and what it is Not! Grand Rounds Presentation, Department Of Family and Community Medicine, Eastern Virginia Medical School, Norfolk VA 2015

Psychiatric Diagnosis and Misdiagnosis, Tidewater Academy of Psychiatry Quarterly Meeting Norfolk VA. 2015

Alcohol Use Disorder: From Detoxification to Relapse Prevention and Treatment. Grand Rounds Presentation, Chesapeake Regional Medical Center, Chesapeake VA. 2016

Alcohol Use Disorder: From Detoxification to Relapse Prevention and Treatment. Tidewater Academy of Psychiatry Quarterly Meeting, Norfolk VA. 2016

Involuntary Movement Disorders for the Psychiatrist. Tidewater Academy of Psychiatry Quarterly Meeting, Norfolk VA. 2017

Bipolar Disorder through the Lifespan, Tidewater Academy of Psychiatry Quarterly Meeting
Norfolk VA. 2018

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Signature

10/23/2019

Date