

VIRGINIA:

IN THE CIRCUIT COURT OF FAIRFAX COUNTY

MOTION [REDACTED] ET

2020 SEP -4 PM 2:42

JOHN T. FREY
CLERK, CIRCUIT COURT
FAIRFAX, VA

JOHN C. DEPP, II,

Plaintiff and Counter-defendant,

v.

AMBER LAURA HEARD,

Defendant and Counter-plaintiff.

Civil Action No.: CL-2019-0002911

**DEFENDANT AMBER LAURA HEARD'S MEMORANDUM IN SUPPORT OF
HER MOTION TO COMPEL PRODUCTION OF DOCUMENTS IN RESPONSE TO
DEFENDANT'S FOURTH, FIFTH, SIXTH AND SEVENTH
REQUEST FOR PRODUCTION OF DOCUMENTS**

Elaine Charlson Bredehoft (VSB No. 23766)
Adam S. Nadelhaft (VSB No. 91717)
David E. Murphy (VSB No. 90938)
Charlson Bredehoft Cohen & Brown, P.C.
11260 Roger Bacon Drive, Suite 201
Reston, Virginia 20190
Telephone: (703) 318-6800

J. Benjamin Rottenborn (VSB #84796)
Joshua R. Treece (VSB #79149)
WOODS ROGERS PLC
10 S. Jefferson Street, Suite 1400
P.O. Box 14125
Roanoke, Virginia 24011
(540) 983-7540

Counsel to Defendant Amber Laura Heard

PRELIMINARY STATEMENT

In addition to a nearly 2 hour meet and confer on August 12, the parties conferred for another nearly 3 hours on August 28 following this Court's August 21, 2020 hearing. The parties have agreed on a number of the requests, and ultimately the timing of Production (These requests were all served in July yet Plaintiff asked for Sept 30, Defendant requested Sept. 4 and suggested a compromise of September 14, but acceded to Plaintiff's Sept. 30 in order to be able to submit to the Court a Consent Order). This motion addresses those remaining Requests in dispute.

ARGUMENT

A. Requests for Audio and Video Recordings/Transcripts of Ms. Heard

- Fourth RFP 1 seeks "All audio and video recordings including Ms. Heard. Note: It has been represented by Depp's UK counsel that Mr. Depp has 50-51 recordings that include Ms. Heard."
- Fourth RFP 2 seeks "All transcripts of any recordings from any audio and video recordings including Ms. Heard."

Att. 1. As noted in Ms. Heard's prior Motion to Compel, these "50-51" recordings were made 4 to 8 years ago and should have been produced long-ago. Mr. Depp agreed to produce responsive, non-privileged documents, but has stated that he intends to "review and withhold" many of these recordings on Fifth Amendment grounds, because he made these recordings without Ms. Heard's consent, which is a crime in California.

As a matter of law, Mr. Depp cannot rely on the Fifth Amendment to avoid producing all such recordings simply because Cal. Penal Code § 632(a) requires two-party consent. The "Fifth Amendment's privilege against self-incrimination does not apply after the relevant limitations period has expired." *Stogner v. California*, 539 U.S. 607, 608 (2003) (citing *Brown v. Walker*, 161 U.S. 591, 597-598 (1896)); see also *Zebbs v. Commonwealth*, 66 Va. App. 368, 377 (2016) ("In *Brown v. Walker*..., the Supreme Court observed that, aside from waiver, expiration of the applicable statute of limitations for the conduct described can operate to remove the protections

against compelled self-incrimination.”). The criminal statute of limitations for violations of Cal. Penal Code § 632(a) is “three [(3)] years after commission of the offense.” *See* Cal. Penal Code § 801. Because these recordings were made between four to eight years ago, the statute of limitations has expired, and Mr. Depp is barred from relying on the Fifth Amendment. Accordingly, Mr. Depp should be ordered to produce all recordings without regard to his unavailing Fifth Amendment privilege claim.

B. Requests for Relevant, Non-Privileged Communications from Adam Waldman

Fourth RFPs 3 & 6 (**Att. 1**) and Fifth RFPs 14 & 15 (**Att. 2**) relate to Mr. Waldman’s non-privileged statements and communications. During the parties’ meet and confer, counsel for Ms. Heard agreed to limit and narrow these Requests. The narrowed Requests are as follows:

- Fourth RFP 3: “All *non-privileged* communications between Mr. Waldman and any person or entity referring to or relating in any manner to Ms. Heard *from the date Mr. Waldman was engaged to represent Mr. Depp in this litigation to present.*”
- Fourth RFP 6: “Any non-privileged statements made by or on behalf of Mr. Waldman relating to Ms. Heard’s 2016 Domestic Violence Restraining Order, Ms. Heard’s or Mr. Depp’s evidence and testimony related thereto, allegations of domestic abuse by Ms. Heard or Mr. Depp, any claim that such allegations are false or part of a fraud or hoax, injuries Mr. Depp is alleged to have caused to Ms. Heard, injuries or damages Ms. Heard is alleged to have caused to Mr. Depp, and/or the claims, counterclaims, defenses or allegations in this lawsuit from May 21, 2016 through the present.”
- Fifth RFP 14: “All communications by Mr. Depp, Mr. Waldman, or anyone on Mr. Depp’s behalf, to any member of the press, or any twitter account or other social media account or the holder or owner of such accounts *from May 21, 2016 through the present that refer or relate to the 2016 Domestic Violence Restraining Order, Ms. Heard’s or Mr. Depp’s evidence and testimony related thereto, allegations of domestic abuse by Ms. Heard or Mr. Depp, injuries Mr. Depp is alleged to have caused to Ms. Heard, injuries or damages Ms. Heard is alleged to have caused to Mr. Depp, and/or the claims, counterclaims, defenses or allegations in this lawsuit.*”
- Fifth RFP 15: “All communications by Mr. Depp, Mr. Waldman, or anyone on Mr. Depp’s behalf, to any member of social media from May 21, 2016 through the present that refer or relate to the 2016 Domestic Violence Restraining Order, Ms. Heard’s or Mr. Depp’s evidence and testimony related thereto, allegations of domestic abuse by Ms. Heard or Mr. Depp, any claim that such allegations are false or part of a fraud or hoax, injuries Mr. Depp is

alleged to have caused to Ms. Heard, injuries or damages Ms. Heard is alleged to have caused to Mr. Depp, and/or the claims, counterclaims, defenses or allegations in this lawsuit.”

Att. 3 (Proposed Consent Order). In the parties’ meet and confer, Mr. Depp confirmed his intent to stand on his objections and his refusal to produce responsive documents involving Mr. Waldman. The information requested, however, is plainly relevant and not privileged, and these Requests have even been narrowed to clarify as much. Mr. Waldman has acted as Mr. Depp’s agent and has repeatedly communicated with third parties about matters that are directly relevant to this action, including preparing “Declarations” with this case’s header, threatening text messages and other incendiary communications, as well as drafts. These documents are clearly within Mr. Depp’s possession, custody, or control. They should be produced.

C. Financial Information Related to Damages and Rebuttal of Plaintiff’s Theory of Defendant’s Financial Motives for Accusing Mr. Depp of Domestic Abuse.

This Court’s first August 10, 2020 Order compelled Mr. Depp to supplement his answer to Ms. Heard’s damages Interrogatory No.16 by August 14. **Att. 4**, at ¶ 4. In his compelled response, Mr. Depp merely stated: “*Based on Mr. Depp’s prior earnings* in connection with the Pirates of the Caribbean franchise, Mr. Depp expects that his role in the sixth installment would have been worth at least \$50,000,000.” This Court’s second August 10, 2020 Order compelled Mr. Depp to produce all documents relating to his damages claim by August 21. **Att. 5**, at ¶¶ 2, 7 (compelling responses to First RFPs 11-12—seeking documents related to acting roles that were rescinded—and Second RFP 13—seeking all documents related to damages or losses). Nonetheless, in the parties’ meet and confer on August 28, counsel for Mr. Depp could not identify a single responsive document produced *by Mr. Depp* to support his damages claim pursuant to this Court’s Order.

Throughout this litigation, Mr. Depp has claimed that Mr. Heard's motive for accusing Mr. Depp of domestic abuse was financial. *See, e.g.*, Att. 6, Depp Decl., at ¶ 31 (May 20, 2019) (alleging "When I did not accede to her demand for money, Ms. Heard publicly accused me of domestic violence, seeking and receiving a temporary restraining order"); *Id.* at ¶ 40 (May 20, 2019) ("Lies, deception, and perjury are useful tools to Ms. Heard and her ilk — to obtain money, to accuse me of violent abuse and obtain a false temporary restraining order"). Ms. Heard and Mr. Depp, however, were married in a no-fault, community property state, and Ms. Heard contends that the amount requested by her counsel at the outset was far, far less than what Ms. Heard would have been entitled to based on Mr. Depp's earnings during the marriage. This is a significant defense to Mr. Depp's allegation that she was essentially extorting from him. Mr. Depp even put forward a Witness Statement from his CPA and Business Manager, Edward White in the UK trial purporting to claim that Ms. Heard should have paid \$6,750,000 (arising out of some alleged tax issues), instead of receiving \$7 million. There was absolutely no supporting documentation accompanying this bold assertion, and none was produced in the UK litigation.

Ms. Heard is entitled to the underlying financial information to be able to justify her contention that she was entitled to far more than she requested, to dispute Mr. White's "calculations," and to defend against Mr. Depp's damages claims, as well as his theory that Ms. Heard accused him of domestic abuse to extort more money from him. Accordingly, Ms. Heard has requested the following which relate to damages, Ms. Heard's foregone entitlement to a greater portion of community property during the divorce, and Mr. Depp's false assertions about an improper motive by Ms. Heard:

- Fourth RFP 14 “All tax returns for Mr. Depp, including all schedules, for the period 2010 through the present.”¹ **Att. 1.**
- Sixth RFP 1-6, and 8: “Documents sufficient to reflect the full amount of earnings, including income, royalties, brand income, and other sources of income, of Mr. Depp, during the marriage between Mr. Depp and Ms. Heard” along with related requests regarding the parties’ marriage and divorce. **Att. 7.**
- Seventh RFPs 1, 3, 5-7 – Documents relating to Mr. White’s testimony and Witness Statements submitted to the UK Court, and his engagement in connection with the divorce settlement. **Att. 8.**

D. Other Requests

The parties have been unable to agree on the following requests (either as originally proposed or as edited by Ms. Heard):

Fifth RFP 1: (revised to “All telephone records and all text messages for the period January 2012-present that refer or relate to Mr. Depp’s substance or alcohol abuse or treatment, Mr. Depp’s acts of physical violence, Mr. Depp’s destruction of property, Ms. Heard’s 2016 Domestic Violence Restraining Order, evidence or testimony related thereto, allegations of physical or nonphysical abuse by Ms. Heard or Mr. Depp, and/or that otherwise refer or relate to the claims, counterclaims, defenses or allegations in this lawsuit. **Att. 2; Att. 3.**

Sixth RFP 9-10: documents sufficient to show remuneration, gifts, or benefits provided to various potential witnesses from 2010 to present, and communications with those same people (modified to “relating to Ms. Heard”); 12 (receipts for expenses incurred at the property in Australia) **Att. 7; Att. 3.**

CONCLUSION


Ms. Heard respectfully request entry of an Order compelling production of the documents sought herein on or before September 25, 2020.

¹ Defendant is entitled to Mr. Depp’s taxes because he has not complied with this Court’s Order, the information is needed to rebut his financial motive theory and Mr. White’s testimony. *See, e.g., Cont’l Fed Sav. Bank v. Cooper*, 17 Va. Cir. 355 (Fairfax Cir. Ct. 1989) (taxes are subject to production if relevant and the opponent cannot meet his burden of proving the information is available from alternative sources).

Dated this 4th day of September 2020.

Respectfully submitted,

Amber L. Heard



Elaine Charlson Bredehoft (VSB No. 23766)
Adam S. Nadelhaft (VSB No. 91717)
David E. Murphy (VSB No. 90938)
Charlson Bredehoft Cohen & Brown, P.C.
11260 Roger Bacon Drive, Suite 201
Reston, Virginia 20190
Telephone: (703) 318-6800
ebredehoft@cbcblaw.com
anadelhaft@cbcblaw.com
dmurphy@cbcblaw.com

J. Benjamin Rottenborn (VSB No. 84796)
Joshua R. Treece (VSB No. 79149)
WOODS ROGERS PLC
10 S. Jefferson Street, Suite 1400
P.O. Box 14125
Roanoke, Virginia 24011
Telephone: (540) 983-7540
brottenborn@woodsrogers.com
jtreece@woodsrogers.com

Counsel to Defendant Amber Laura Heard

CERTIFICATE OF SERVICE

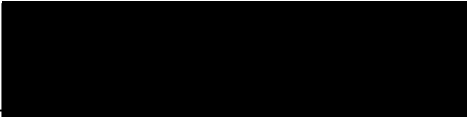
I certify that on this 4th day of September 2020, a copy of the foregoing shall be served by via email, pursuant to the Agreed Order dated August 16, 2019, as follows:

Benjamin G. Chew, Esq.
Andrew C. Crawford, Esq.
BROWN RUDNICK LLP
601 Thirteenth Street, N.W.
Washington, D.C. 20005
Telephone: (202) 536-1700
Facsimile: (202) 536-1701
bchew@brownrudnick.com
acrawford@brownrudnick.com

Camille M. Vasquez, Esq.
BROWN RUDNICK LLP
2211 Michelson Drive
Irvine, CA 92612
Telephone: (949) 752-7100
Facsimile: (949) 252-1514
cvasquez@brownrudnick.com

Adam R. Waldman, Esq.
THE ENDEAVOR LAW FIRM, P.C.
1775 Pennsylvania Avenue, N.W., Suite 350
Washington, DC 20006
awaldman@theendeavorgroup.com

Counsel for Plaintiff John C. Depp, II


Elaine Charlson Bredehoff (VSB No. 23766)

ATTACHMENT 1

2. Plaintiff objects to each and every Request to the extent that the Requests (including the “Definitions” and “Instructions” identified in the Requests) (a) are overly broad or unduly burdensome; (b) are vague, ambiguous, duplicative, cumulative, or do not identify with reasonable particularity the information sought; (c) call for information that is neither relevant nor reasonably calculated to lead to the discovery of admissible evidence; (d) seek to impose obligations on Plaintiff beyond or inconsistent with those required by Virginia law and the rules of this Court (“Rules”); or (e) purport to seek documents or information not in Plaintiff’s actual possession, custody, or control; any statement herein that Plaintiff will produce documents responsive to a specific Request means that Plaintiff will produce documents located through a reasonable search for documents in its possession, custody, and control.

3. Plaintiff objects to the extent that the discovery sought by the Requests is obtainable from some other source that is more convenient, less burdensome, or less expensive.

4. Plaintiff objects to the extent the discovery sought is unduly burdensome or expensive, taking into account the needs of the case, the amount in controversy, limitations on the parties’ resources, and the importance of the issues at stake in the litigation.

5. Plaintiff objects to each and every Request, Definition, and Instruction to the extent that they purport to require production of documents at a specified time or place, or in a specified manner. Plaintiff will make documents available in accordance with Rule 4:9 and any agreement among the parties or orders of the Court governing the conduct of discovery.

6. Plaintiff objects to the Requests to the extent that they seek documents or information protected by the attorney-client privilege, the work product doctrine, or any other applicable privilege, protection, exemption or immunity. Plaintiff will produce only non-privileged information. Inadvertent disclosure of any privileged or otherwise protected

documents or information shall not constitute a waiver of any claim of privilege, protection, exemption or immunity. Plaintiff reserves the right to redact documents produced in response to the Requests.

7. Plaintiff objects to the Requests, including the Definitions and Instructions contained therein, to the extent they seek documents or information protected from disclosure as being a trade secret or other confidential business or proprietary information, or documents or information that, if produced or disclosed, would result in the violation of any contractual obligation to third parties, or any applicable right to privacy of Plaintiff or third parties.

8. Plaintiff objects to any Request seeking “all” documents on the grounds that Plaintiff cannot guarantee that he has located every single document responsive to a particular Request. Subject to the general objections and any qualifications below, Plaintiff will respond to any Request seeking “all” documents by producing the responsive, non-privileged documents within its possession, custody, and control that can be located after a reasonable search conducted in good faith.

9. Plaintiff reserves the right to produce documents responsive to the Requests on a rolling basis at a time, place, and manner to be agreed on by the parties.

10. Plaintiff objects to the Requests, including the Definitions and Instructions contained therein, to the extent that they are redundant or duplicative of other specific Requests. Where information or a document may be responsive to more than one Request, Plaintiff will provide that information or produce that document only once.

11. Plaintiff objects to the Requests to the extent that they purport to require the identification and/or restoration of any deleted, legacy, backup, or archival data, or otherwise

seek the production of any document that is not accessible without undue burden or unreasonable expense.

12. Plaintiff objects to each of the Requests to the extent that the Requests or related Instructions purport to impose any discovery obligations on Plaintiff beyond those already imposed by applicable law.

13. Plaintiff's responses to the Requests are not intended to be, nor shall be deemed, an admission of matters stated, implied, or assumed by any or all of the Requests. In responding to the Requests, Plaintiff neither waives nor intends to waive, but expressly reserves, any and all objections as to the authenticity, relevance, competency, materiality, or admissibility at trial or during any proceeding of any information or documents produced, set forth, or referred to herein.

14. Any response by Plaintiff stating that it will produce documents is not intended as a representation that such documents exist within any requested category or categories but solely as an assertion that Plaintiff will produce (consistent with these Responses and Objections) any non-privileged, responsive documents or information within its actual possession, custody, or control that can be located after a reasonable search conducted in good faith.

15. Plaintiff objects to any factual assumptions, implications, and explicit or implicit characterizations of facts, events, circumstances, or issues in the Requests. Plaintiff's responses herein are not intended to mean that Plaintiff agrees with any factual assumptions, implications, or any explicit or implicit characterization of facts, events, circumstances, or issues in the Requests, and are without prejudice to Plaintiff's right to dispute facts and legal conclusions assumed in the Requests.

16. These objections and responses are based on Plaintiff's present knowledge, information, and belief, and therefore remain subject to change or modification based on further

discovery of facts or circumstances that may come to Plaintiff's attention. Plaintiff reserves the right to rely on any facts, documents, evidence, or other contentions that may develop or come to its attention at a later time and to supplement or amend the responses at any time prior to the trial. Plaintiff further reserves the right to raise any additional objections deemed necessary or appropriate in light of any further review.

OBJECTIONS TO INSTRUCTIONS AND DEFINITIONS

Instructions

1. In accordance with the Rules of this Court, You shall answer the following Requests separately and fully, in writing.

RESPONSE: No objection.

2. Where information in Your possession is requested, such request includes nonprivileged information in the possession of Your agent(s), employee(s), assign(s), representative(s), and all others acting on Your behalf.

RESPONSE: Plaintiff objects to this instruction as overly broad and unduly burdensome, to the extent that it requires production of documents from individuals not under Plaintiff's control. Plaintiff will produce documents from a limited number of custodians to be negotiated with Defendant in good faith.

3. Whenever appropriate in these Requests, the singular form of a word shall be interpreted as its plural to whatever extent is necessary to bring within the scope of these Requests any information which might otherwise be construed to be outside their scope.

RESPONSE: No objection.

4. Unless otherwise indicated, these Requests refer to the time, place, and circumstances of the occurrences mentioned or complained of in the pleadings in this case.

RESPONSE: Plaintiff objects to this instruction as overly broad and unduly burdensome, to the extent that it requires production of documents not within the possession, custody or control of Plaintiff. Plaintiff will produce documents from

a relevant time period to be negotiated with Defendant in good faith. Plaintiff further objects to this instruction as vague and ambiguous.

5. All references to an entity include the entity and its agents, officers, employees, representatives, subsidiaries, divisions, successors, predecessors, assigns, parents, affiliates, and unless privileged, its attorneys and accountants.

RESPONSE: Plaintiff objects to this instruction as overly broad and unduly burdensome, to the extent that it requires production of documents from individuals and entities other than Plaintiff and/or documents that are not within Plaintiff's custody and control.

6. If You perceive any ambiguities in a question, instruction, definition, or other aspect of these discovery requests, set forth the matter deemed ambiguous and the construction used in answering.

RESPONSE: No objection.

7. If You assert a claim of privilege as to any of Your responses to the Requests, state the basis for the asserted privilege, specify the privilege claimed, and include in Your answer sufficient information to permit the Court to make an informed ruling on the claim of privilege. If the claim relates to a privileged document, state the date, person or persons who prepared or participated in preparing the document, the name and address of any person to whom the document was shown or sent, the general subject matter of the document, the present or last known location and custodian of the original of the document, and the basis for the claim of privilege with respect to the document. If the claim of privilege relates to a communication, state the date(s), place(s) and person(s) involved in the communication, the subject matter of the communication, and the basis for the claim of privilege with respect to that communication. Reliance on any claim of privilege is subject to the Rules of this Court, including the production of a privilege log.

RESPONSE: Plaintiff objects to this instruction as overly broad and unduly burdensome, to the extent that it requires Plaintiff to produce a privilege log in a specific manner at a specific time. Plaintiff will produce a privilege log at a time and in a manner to be negotiated with Defendant in good faith.

8. If You perceive any Request to be overly broad, unduly burdensome, or objectionable for any other reason, respond to the fullest extent possible and clearly note any objection so that the Court will be permitted to make an informed ruling on the objection.

RESPONSE: No objection.

9. These Requests are continuing in character so as to require You to promptly amend or supplement Your responses in accordance with the Rules of the Supreme Court of Virginia within a reasonable time if You obtain or become aware of any further information responsive to these Requests. Ms. Heard reserves the right to propound additional Requests.

RESPONSE: No objection.

10. Unless otherwise indicated, these requests include the time from when the parties met, in 2008.

RESPONSE: Plaintiff objects to this instruction as overly broad, unduly burdensome, and harassing to the extent that it purports to require Plaintiff to produce documents from a twelve-year timeframe that encompasses documents that are not relevant to the subject matter of this action.

Definitions

a. ***Action.*** The term “Action” means the above-captioned action.

RESPONSE: No objection.

b. ***Communication.*** The term “communication” means any oral or written exchange of words, thoughts, or ideas to another person, whether person-to-person, in a group, by phone, text (SMS), letter, fax, e-mail, internet post or correspondence, social networking post or correspondence or by any other process, electric, electronic, or otherwise. All such

Communications are included without regard to the storage or transmission medium (electronically stored information and hard copies are included within this definition).

RESPONSE: No objection.

c. ***Document.*** The term “document” is defined in its broadest terms currently recognized. The term shall include, without limitations: any written or other compilation of information (whether printed, handwritten, recorded, or encoded, produced, reproduced, or reproducible by any other process), drafts (revisions or finals), original or preliminary notes, and summaries of other documents, communications of any type (e-mail, text messages, blog posts, social media posts or other similar communications or correspondence), computer tape, computer files, and including all of their contents and attached files. The term “document” shall also include but not be limited to: correspondence, memoranda, contractual documents, specifications, drawings, photographs, images, aperture cards, notices of revisions, test reports, inspection reports, evaluations, technical reports, schedules, agreements, reports, studies, analyses, projections, forecasts, summaries, records of conversations or interviews, minutes or records of conferences or meetings, manuals, handbooks, brochures, pamphlets, advertisements, circulars, press releases, financial statements, calendars, diaries, trip reports, etc. A draft of a non-identical copy is a separate document within the meaning of this term.

RESPONSE: Plaintiff objects to this definition as overly broad and unduly burdensome, and to the extent that it seeks to impose burdens beyond what are required by the Rules.

d. ***Correspondence.*** The term “correspondence” means any document(s) and/or communication(s) sent to or received from another entity and/or person.

RESPONSE: Plaintiff objects to this definition as overly broad and unduly burdensome, to the extent that it is duplicative of the terms Document and Communication, and to the extent that it seeks to impose burdens beyond what are required by the Rules.

e. **Person.** The term “person” is defined as any natural person, business, company, partnership, legal entity, governmental entity, and/or association.

RESPONSE: No objection.

f. **Concerning.** The term “concerning” includes relating to, referring to, describing, evidencing, or constituting.

RESPONSE: No objection.

g. **Including.** The term “including” means including but not limited to.

RESPONSE: No objection.

h. **And/or.** The use of “and/or” shall be interpreted in every instance both conjunctively and disjunctively in order to bring within the scope of these discovery requests any information which might otherwise be construed to be outside their scope.

RESPONSE: No objection

i. **Defendant and/or Ms. Heard.** The terms “Defendant” and/or “Ms. Heard” refer to Defendant Amber Laura Heard, including her agents, representatives, employees, assigns, and unless privileged, all persons acting on her behalf.

RESPONSE: Plaintiff objects to this definition as overly broad and unduly burdensome, to the extent that it is inclusive of “agents, representatives, employees, assigns, and unless privileged, all persons acting on her behalf.”

j. **Plaintiff and/or Mr. Depp.** The terms “Plaintiff” and/or “Mr. Depp” refer to Plaintiff John C. Depp, II, including his agents, representatives, employees, assigns, and all persons acting on his behalf.

RESPONSE: Plaintiff objects to this definition as overly broad and unduly burdensome, to the extent that it is inclusive of “agents, representatives, employees, assigns, and all persons acting on his behalf.” Plaintiff will interpret this term to exclude all privileged communications and documents.

k. *Complaint.* The term “Complaint” shall mean the Complaint filed by Plaintiff in this Action.

RESPONSE: No objection.

l. *You and/or Your.* The terms “You” and/or “Your” refer to the recipient(s) of these discovery requests, as well as all persons and entities over which said recipient has “control” as understood by the Rules of this Court.

RESPONSE: No objection.

REQUESTS

1. All audio and video recordings including Ms. Heard. Note: It has been represented by Depp’s UK counsel that Mr. Depp has 50-51 recordings that include Ms. Heard.

RESPONSE:

Plaintiff repeats and incorporates by this reference the General Objections and Objections to Definitions and Instruction above, as though set forth in full. Plaintiff further objects to this Request on the grounds that it is overly broad and unduly burdensome, including to the extent that it seeks the productions of documents that are already within Defendant’s possession, custody, or control, and/or are publicly available. Plaintiff further objects to this Request to the extent that it could be construed to seek documents that are protected from disclosure by the attorney-client privilege, attorney work-product doctrine, or any other applicable privilege, immunity, or protection. Plaintiff further objects to this Request as vague and ambiguous as to the meaning of the phrase “recordings including Ms. Heard.”

Subject to and without waiving the foregoing objections, Plaintiff will produce non-privileged documents responsive to this Request, if any, that are located after a reasonable search, on a rolling basis.

2. All transcripts of any recordings from any audio and video recordings including Ms. Heard. Please include documents sufficient to reflect the identity and qualifications of the person or persons transcribing each such recording.

RESPONSE:

Plaintiff repeats and incorporates by this reference the General Objections and Objections to Definitions and Instructions above, as though set forth in full. Plaintiff further objects to this Request on the grounds that it is overly broad and unduly burdensome, including to the extent that it seeks the productions of documents that are already within Defendant's possession, custody, or control, and to the extent that it seeks production of documents reflecting the identity and qualifications of persons transcribing recordings, if any. Plaintiff further objects to this Request on the grounds that it seeks documents that are protected from disclosure by the attorney-client privilege, attorney work-product doctrine, or any other applicable privilege, immunity, or protection. Plaintiff further objects to this Request as vague and ambiguous as to the meaning of the phrase "recordings including Ms. Heard."

Subject to and without waiving the foregoing objections, Plaintiff will produce non-privileged documents responsive to this Request, if any, that are located after a reasonable search, on a rolling basis.

3. All communications between Mr. Waldman and any person or entity referring to or relating in any manner to Ms. Heard. This includes all texts, emails, correspondence, recordings, or other form of communications referring to or relating in any manner to Ms. Heard.

RESPONSE:

Plaintiff repeats and incorporates by this reference the General Objections and Objections to Definitions and Instructions above, as though set forth in full. Plaintiff further objects to this Request on the grounds that it improperly seeks to require Plaintiff to produce documents and communications that were neither generated nor maintained by Plaintiff, but rather by Plaintiff's

attorney Adam Waldman. Such documents should be sought, if at all, via a subpoena to Mr. Waldman, and no such subpoena appears to have issued or been served. Plaintiff further objects to this request on the grounds and to the extent that it seeks documents that are not within Plaintiff's possession, custody, or control, as any such documents would be the property of a nonparty to this Action, with a right to object to their disclosure in this Action that is independent of Plaintiff's right to do so. Plaintiff further objects to this Request on the grounds that it seeks documents protected by the attorney-client privilege because, among other reasons, this Request improperly encompasses communications between Plaintiff and/or his agents, on the one hand, and Plaintiff's attorney Mr. Waldman, on the other hand. Plaintiff further objects to this Request on the grounds that it seeks documents protected by the work-product doctrine, including and especially as it seeks documents that reflect the strategy, analysis, and mental impressions of counsel for Plaintiff. Plaintiff further objects to this Request on the grounds that it seeks documents that are neither relevant nor reasonably calculated to lead to the discovery of admissible evidence, and is overly broad, unduly burdensome, and harassing, because it seeks documents and communications "relating in any manner" to Defendant, without tailoring the scope of the request to the subject matter of this action, i.e., the relationship between Plaintiff and Defendant. Plaintiff further objects to this Request to the extent that it constitutes an invasion of privacy.

Accordingly, Plaintiff will not produce documents in response to this Request.

4. All communications between Mr. Depp and any person or entity referring to or relating in any manner to Ms. Heard. This includes all texts, emails, correspondence, recordings, or other form of communications referring to or relating in any manner to Ms. Heard.

RESPONSE:

Plaintiff repeats and incorporates by this reference the General Objections and Objections to Definitions and Instructions above, as though set forth in full. Plaintiff further objects to this

Request on the grounds that it seeks documents protected by the attorney-client privilege. Plaintiff further objects to this Request on the grounds that it seeks documents protected by the work-product doctrine. Plaintiff further objects to this Request on the grounds that it seeks documents that are neither relevant nor reasonably calculated to lead to the discovery of admissible evidence, and is overly broad, unduly burdensome, and harassing, because it seeks documents and communications “relating in any manner” to Defendant, without tailoring the scope of the request to the subject matter of this action, i.e., the relationship between Plaintiff and Defendant. Plaintiff further objects to this Request to the extent that it constitutes an invasion of privacy.

Subject to and without waiving the foregoing objections, Plaintiff will produce non-privileged documents responsive to this Request, if any, that are located after a reasonable search, on a rolling basis.

5. Any statements made by or on behalf of Mr. Depp relating in any manner to Ms. Heard from May 21, 2016 through the present.

RESPONSE:

Plaintiff repeats and incorporates by this reference the General Objections and Objections to Definitions and Instructions, above, as though set forth in full. Plaintiff further objects to this Request on the grounds that it seeks documents protected by the attorney-client privilege. Plaintiff further objects to this Request on the grounds that it seeks documents protected by the work-product doctrine. Plaintiff further objects to this Request on the grounds that it seeks documents that are neither relevant nor reasonably calculated to lead to the discovery of admissible evidence, and is overly broad, unduly burdensome, and harassing, because it seeks documents and communications “relating in any manner” to Defendant, without tailoring the scope of the request to the subject matter of this action, i.e., the relationship between Plaintiff

and Defendant. Plaintiff further objects to this Request to the extent that it constitutes an invasion of privacy. Plaintiff further objects to this Request on the grounds that it is vague and ambiguous as to the meaning of the term “statements.”

Subject to and without waiving the foregoing objections, Plaintiff will produce non-privileged documents responsive to this Request, if any, that are located after a reasonable search, on a rolling basis.

6. Any statements made by or on behalf of Mr. Waldman relating in any manner to Ms. Heard from May 21, 2016 through the present.

RESPONSE:

Plaintiff repeats and incorporates by this reference the General Objections and Objections to Definitions and Instructions, above, as though set forth in full. Plaintiff further objects to this Request on the grounds that it improperly seeks to require Plaintiff to produce documents and communications that were neither generated nor maintained by Plaintiff, but rather by Plaintiff’s attorney Mr. Waldman. Such documents should be sought, if at all, via a subpoena to Mr. Waldman, and no such subpoena appears to have issued or been served. Plaintiff further objects to this request on the grounds and to the extent that it seeks documents that are not within Plaintiff’s possession, custody, or control, as any “statements made by or on behalf of” Mr. Waldman would be the property of a nonparty to this Action, with a right to object to their disclosure in this Action that is independent of Plaintiff’s right to do so. Plaintiff further objects to this Request on the grounds that it seeks documents protected by the attorney-client privilege because, among other reasons, this Request improperly encompasses communications between Plaintiff and/or his agents, on the one hand, and Plaintiff’s attorney Mr. Waldman, on the other hand. Plaintiff further objects to this Request on the grounds that it seeks documents protected by the work-product doctrine, including and especially as it seeks documents that reflect the

strategy, analysis, and mental impressions of counsel for Plaintiff. Plaintiff further objects to this Request on the grounds that it seeks documents that are neither relevant nor reasonably calculated to lead to the discovery of admissible evidence, and is overly broad, unduly burdensome, and harassing, because it seeks documents and communications “relating in any manner” to Defendant, without tailoring the scope of the request to the subject matter of this action, i.e., the relationship between Plaintiff and Defendant. Plaintiff further objects to this Request to the extent that it constitutes an invasion of privacy. Plaintiff further objects to this Request on the grounds that it is ambiguous as to the term “statements.”

Accordingly, Plaintiff will not produce documents in response to this Request.

7. All communications between Mr. Depp or anyone on behalf of Mr. Depp, and any person in the entertainment industry relating in any manner to Ms. Heard from May 21, 2016 through the present.

RESPONSE:

Plaintiff repeats and incorporates by this reference the General Objections and Objections to Definitions and Instructions, above, as though set forth in full. Plaintiff further objects to this Request on the grounds that it seeks documents protected by the attorney-client privilege. Plaintiff further objects to this Request on the grounds that it seeks documents protected by the work-product doctrine. Plaintiff further objects to this Request on the grounds that it seeks documents that are neither relevant nor reasonably calculated to lead to the discovery of admissible evidence, and is overly broad, unduly burdensome, and harassing, because it seeks documents and communications “relating in any manner” to Defendant, without tailoring the scope of the request to the subject matter of this action, i.e., the relationship between Plaintiff and Defendant. Plaintiff further objects to this Request to the extent that it constitutes an invasion of privacy. Plaintiff further objects to this Request on the grounds that it is vague and ambiguous as to the meaning of the term “entertainment industry” and “in any manner.”

Subject to and without waiving the foregoing objections, Plaintiff will produce non-privileged documents responsive to this Request, if any, that are located after a reasonable search, on a rolling basis.

8. All communications of any nature between Mr. Depp, Mr. Waldman or any representative of Mr. Depp, and any individual or representative of the Eastern Columbia Building, aka the South Broadway apartments, at any time from May 21, 2016 through the present. This includes, but is not limited to: Any request for videotapes from security cameras, any review of any footage, any retention of any footage, any clips, or selection, any preservation requests or discussion, and any discussion or communications with any employees or contractors of Eastern Columbia Building.

RESPONSE:

Plaintiff repeats and incorporates by this reference the General Objections and Objections to Definitions and Instructions, above, as though set forth in full. Plaintiff further objects to this Request on the grounds that it seeks documents protected by the attorney-client privilege. Plaintiff further objects to this Request on the grounds that it seeks documents protected by the work-product doctrine. Plaintiff further objects to this Request on the grounds and to the extent that it seeks documents that were not generated or maintained by Plaintiff and are not within Plaintiff's possession, custody, or control. Plaintiff further objects to this Request on the grounds that it seeks documents that are neither relevant nor reasonably calculated to lead to the discovery of admissible evidence, and is overly broad, unduly burdensome, and harassing, because it seeks documents and communications "of any nature" over a four-year time period that are not limited by subject matter. Plaintiff further objects to this Request on the grounds and to the extent that it constitutes an invasion of privacy. Plaintiff further objects to this Request on the grounds that it is vague and ambiguous.

Accordingly, Plaintiff will not produce documents in response to this Request as presently framed. Plaintiff may be willing to supplement this response if Defendant modifies its scope to seek documents pertinent to the subject matter of this action.

9. All communications with the LA police department, including any police officers, relating in any manner to Ms. Heard from May 21, 2016 through the present.

RESPONSE:

Plaintiff repeats and incorporates by this reference the General Objections and Objections to Definitions and Instructions above, as though set forth in full. Plaintiff further objects to this Request to the extent that it seeks documents protected by the attorney-client privilege. Plaintiff further objects to this Request to the extent that it seeks documents protected by the work-product doctrine. Plaintiff further objects to this Request on the grounds that it seeks documents that are neither relevant nor reasonably calculated to lead to the discovery of admissible evidence, and is overly broad, unduly burdensome, and harassing, because it seeks documents and communications “relating in any manner” to Defendant, without tailoring the scope of the request to the subject matter of this action, i.e., the relationship between Plaintiff and Defendant. Plaintiff further objects to this Request to the extent that it constitutes an invasion of privacy.

Subject to and without waiving the foregoing objections, Plaintiff will produce non-privileged documents responsive to this Request, if any, that are located after a reasonable search, on a rolling basis.

10. All documents between or among Mr. Depp or any representative of Mr. Depp, and Christi Dembrowski, Ben King, Kevin Murphy, Jerry Judge, Nathan Holmes, Malcolm Connelly, Steven Deuters, any other security for Mr. Depp, house personnel, housekeeping, and personal assistant staff, during the following date periods: January 1 - March 30, 2013; June 27-July 7, 2013; May 1-May 31, 2014; August 1-September 15, 2014; December 1, 2014-January 3, 2015; January 20 - February 12, 2015; March 1-March 30, 2015; July 15-August 5, 2015; November 20, 2015-December 31, 2015; April 15, 2016-April 30, 2016; May 3, 2016-May 21, 2016; May 22, 2016 through present.

RESPONSE:

Plaintiff repeats and incorporates by this reference the General Objections and Objections to Definitions and Instructions above, as though set forth in full. Plaintiff further objects to this Request on the grounds that it seeks documents protected by the attorney-client privilege and/or

common interest doctrine. Plaintiff further objects to this Request on the grounds that it seeks documents protected by the work-product doctrine. Plaintiff further objects to this Request on the grounds and to the extent that it seeks documents that were not generated or maintained by Plaintiff and are not within Plaintiff's possession, custody, or control. Plaintiff further objects to this Request on the grounds that it seeks documents that are neither relevant nor reasonably calculated to lead to the discovery of admissible evidence, and is overly broad, unduly burdensome, and harassing, because, among other reasons, it seeks documents and communications with multiple disparate persons, without any limitation as to the subject matter of any such communications. No reasonable nexus exists between the unlimited scope of this request and the subject matter of this Action. Plaintiff further objects to this Request on the grounds that it constitutes an invasion of privacy, especially to the extent that it seeks private communications of Plaintiff and various third parties that are not properly at issue in this Action. Plaintiff further objects to this Request on the grounds that it is vague and ambiguous.

Accordingly, Plaintiff will not produce documents in response to this Request.

11. All communications between Mr. Depp, or any representative of Mr. Depp, and anyone at Disney, or on behalf of Disney, relating in any manner to Disney's consideration of, and decision, not to cast Mr. Depp in the sixth Pirates of the Caribbean movie.

RESPONSE:

Plaintiff repeats and incorporates by this reference the General Objections and Objections to Definitions and Instructions above, as though set forth in full. Plaintiff further objects to this Request to the extent that it seeks documents protected by the attorney-client privilege. Plaintiff further objects to this Request to the extent that it seeks documents protected by the work-product doctrine. Plaintiff further objects to this Request on the grounds that it is overly broad, unduly burdensome, and harassing, because it seeks documents and communications relating "in any manner" to the casting decisions by Disney. Plaintiff further objects to this Request on the

grounds and to the extent that it constitutes an invasion of privacy. Plaintiff further objects to this Request on the grounds that it is vague and ambiguous.

Subject to and without waiving the foregoing objections, Plaintiff will produce non-privileged documents responsive to this Request, if any, that are located after a reasonable search, on a rolling basis.

12. If Mr. Depp contends that he has lost any role or other job as the result of Ms. Heard's Op-Ed, please produce all documents supporting such claim.

RESPONSE:

Plaintiff repeats and incorporates by this reference the General Objections and Objections to Definitions and Instructions above, as though set forth in full. Plaintiff further objects to this Request on the grounds that it seeks documents protected by the attorney-client privilege. Plaintiff further objects to this Request on the grounds that it seeks documents protected by the work-product doctrine. Plaintiff further objects to this Request on the grounds that it is overly broad, unduly burdensome, and harassing, because it seeks "all documents" that could be construed as supporting Plaintiff's claims. Plaintiff further objects to this Request to the extent that it constitutes an invasion of privacy. Plaintiff further objects to this Request on the grounds that it is vague and ambiguous. Plaintiff further objects to this Request on the grounds that it seeks premature expert discovery.

Subject to and without waiving the foregoing objections, Plaintiff will produce non-privileged documents responsive to this Request, if any, that are located after a reasonable search, on a rolling basis.

13. Please provide all documents supporting each aspect of Mr. Depp's claims that he has been damaged, including all documents supporting the \$50 million *ad damnum* clause.

RESPONSE:

Plaintiff repeats and incorporates by this reference the General Objections and Objections to Definitions and Instructions above, as though set forth in full. Plaintiff further objects to this Request on the grounds that it seeks documents protected by the attorney-client privilege. Plaintiff further objects to this Request on the grounds that it seeks documents protected by the work-product doctrine. Plaintiff further objects to this Request on the grounds that it is overly broad, unduly burdensome, and harassing, because it seeks “all documents” that could be construed as supporting Plaintiff’s claims. Plaintiff further objects to this Request to the extent that it constitutes an invasion of privacy. Plaintiff further objects to this Request on the grounds that it is vague and ambiguous. Plaintiff further objects to this Request on the grounds that it seeks premature expert discovery.

Subject to and without waiving the foregoing objections, Plaintiff will produce non-privileged documents responsive to this Request, if any, that are located after a reasonable search, on a rolling basis.

14. All tax returns for Mr. Depp, including all schedules, for the period 2010 through the present.

RESPONSE:

Plaintiff repeats and incorporates by this reference the General Objections and Objections to Definitions and Instructions above, as though set forth in full. Plaintiff further objects to this Request on the grounds that it is overly broad, unduly burdensome, and harassing, because it seeks confidential financial information over a ten-year period. Plaintiff further objects to this Request on the grounds that it constitutes an improper invasion of privacy by seeking disclosure of personal financial information of Plaintiff, since because “a party’s income tax return contains confidential and personal information, inspection or disclosure of it should only be permitted for good cause.” *See, Sanford v. Sanford*, 450 SE 2d 185 (1994). Plaintiff further objects to this

request on the grounds that it seeks documents that are neither relevant, nor reasonably calculated to lead to the discovery of admissible evidence, and is disproportionate to the needs of the case, as the totality of Plaintiff's financial condition is not at issue in this action and is not a proper avenue of discovery. Plaintiff further objects to this Request on the grounds that to the extent it is intended to obtain information pertaining to Plaintiff's damages, such information is obtainable by less burdensome and intrusive means.

Accordingly, Plaintiff will not produce documents in response to this Request.

15. All documents supporting any reputational or financial damages claimed by Mr. Depp.

RESPONSE:

Plaintiff repeats and incorporates by this reference the General Objections and Objections to Definitions and Instructions above, as though set forth in full. Plaintiff further objects to this Request on the grounds that it seeks documents protected by the attorney-client privilege. Plaintiff further objects to this Request on the grounds that it seeks documents protected by the work-product doctrine. Plaintiff further objects to this Request on the grounds that it is overly broad, unduly burdensome, and harassing, because it seeks "all documents" that could be construed as supporting Plaintiff's claims. Plaintiff further objects to this Request to the extent that it constitutes an invasion of privacy. Plaintiff further objects to this Request on the grounds that it is vague and ambiguous. Plaintiff further objects to this Request on the grounds that it seeks premature expert discovery.

Subject to and without waiving the foregoing objections, Plaintiff will produce non-privileged documents responsive to this Request, if any, that are located after a reasonable search, on a rolling basis.

Dated: July 23, 2020

Respectfully submitted,



Benjamin G. Chew (VSB #29113)
Camille M. Vasquez (*pro hac vice*)
Andrew C. Crawford (VSB #89093)
BROWN RUDNICK, LLP
601 Thirteenth Street NW, Suite 600
Washington, DC 20005
Phone: (202) 536-1785
Fax: (617) 289-0717
bchew@brownrudnick.com

- and -

Adam R. Waldman
THE ENDEAVOR GROUP LAW FIRM, P.C.
1775 Pennsylvania Avenue NW, Suite 350
Washington, DC 20006


Counsel for Plaintiff John C. Depp, II

CERTIFICATE OF SERVICE

I hereby certify that on this 23rd day of July, 2020, I caused copies of the foregoing to be served via email (per written agreement between the Parties) on the following:

A. Benjamin Rottenborn (VSB No. 84796)
Joshua R. Treece (VSB No. 79149)
WOODS ROGERS PLC
10 S. Jefferson Street, Suite 1400
P.O. Box 14125
Roanoke, Virginia 24011
Telephone: (540) 983-7540
brottenborn@woodsrogers.com
jtreece@woodsrogers.com

Elaine Charlson Bredehoft (VSB No. 23766)
Carla D. Brown (VSB No. 44803)
Adam S. Nadelhaft (VSB No. 91717)
David E. Murphy (VSB No. 90938)
CHARLSON BREDEHOFT COHEN &
BROWN, P.C.
11260 Roger Bacon Dr., Suite 201
Reston, VA 20190
Phone: 703-318-6800
Fax: 703-318-6808
cbredchoft@cbcbllaw.com
cbrown@cbcbllaw.com
anadelhaft@cbcbllaw.com
dmurphy@cbcbllaw.com


Benjamin G. Chew

ATTACHMENT 2

2. Plaintiff objects to each and every Request to the extent that the Requests (including the "Definitions" and "Instructions" identified in the Requests) (a) are overly broad or unduly burdensome; (b) are vague, ambiguous, duplicative, cumulative, or do not identify with reasonable particularity the information sought, (c) call for information that is neither relevant nor reasonably calculated to lead to the discovery of admissible evidence; (d) seek to impose obligations on Plaintiff beyond or inconsistent with those required by Virginia law and the rules of this Court ("Rules"); or (e) purport to seek documents or information not in Plaintiff's actual possession, custody, or control; any statement herein that Plaintiff will produce documents responsive to a specific Request means that Plaintiff will produce documents located through a reasonable search for documents in its possession, custody, and control.

3. Plaintiff objects to the extent that the discovery sought by the Requests is obtainable from some other source that is more convenient, less burdensome, or less expensive.

4. Plaintiff objects to the extent the discovery sought is unduly burdensome or expensive, taking into account the needs of the case, the amount in controversy, limitations on the parties' resources, and the importance of the issues at stake in the litigation.

5. Plaintiff objects to each and every Request, Definition, and Instruction to the extent that they purport to require production of documents at a specified time or place, or in a specified manner. Plaintiff will make documents available in accordance with Rule 4:9 and any agreement among the parties or orders of the Court governing the conduct of discovery.

6. Plaintiff objects to the Requests to the extent that they seek documents or information protected by the attorney-client privilege, the work product doctrine, or any other applicable privilege, protection, exemption or immunity. Plaintiff will produce only non-privileged information. Inadvertent disclosure of any privileged or otherwise protected

documents or information shall not constitute a waiver of any claim of privilege, protection, exemption or immunity. Plaintiff reserves the right to redact documents produced in response to the Requests

7. Plaintiff objects to the Requests, including the Definitions and Instructions contained therein, to the extent they seek documents or information protected from disclosure as being a trade secret or other confidential business or proprietary information, or documents or information that, if produced or disclosed, would result in the violation of any contractual obligation to third parties, or any applicable right to privacy of Plaintiff or third parties.

8. Plaintiff objects to any Request seeking "all" documents on the grounds that Plaintiff cannot guarantee that he has located every single document responsive to a particular Request. Subject to the general objections and any qualifications below, Plaintiff will respond to any Request seeking "all" documents by producing the responsive, non-privileged documents within its possession, custody, and control that can be located after a reasonable search conducted in good faith.

9. Plaintiff reserves the right to produce documents responsive to the Requests on a rolling basis at a time, place, and manner to be agreed on by the parties

10. Plaintiff objects to the Requests, including the Definitions and Instructions contained therein, to the extent that they are redundant or duplicative of other specific Requests. Where information or a document may be responsive to more than one Request, Plaintiff will provide that information or produce that document only once.

11. Plaintiff objects to the Requests to the extent that they purport to require the identification and/or restoration of any deleted, legacy, backup, or archival data, or otherwise

seek the production of any document that is not accessible without undue burden or unreasonable expense.

12. Plaintiff objects to each of the Requests to the extent that the Requests or related Instructions purport to impose any discovery obligations on Plaintiff beyond those already imposed by applicable law.

13. Plaintiff's responses to the Requests are not intended to be, nor shall be deemed, an admission of matters stated, implied, or assumed by any or all of the Requests. In responding to the Requests, Plaintiff neither waives nor intends to waive, but expressly reserves, any and all objections as to the authenticity, relevance, competency, materiality, or admissibility at trial or during any proceeding of any information or documents produced, set forth, or referred to herein.

14. Any response by Plaintiff stating that it will produce documents is not intended as a representation that such documents exist within any requested category or categories but solely as an assertion that Plaintiff will produce (consistent with these Responses and Objections) any non-privileged, responsive documents or information within its actual possession, custody, or control that can be located after a reasonable search conducted in good faith

15. Plaintiff objects to any factual assumptions, implications, and explicit or implicit characterizations of facts, events, circumstances, or issues in the Requests. Plaintiff's responses herein are not intended to mean that Plaintiff agrees with any factual assumptions, implications, or any explicit or implicit characterization of facts, events, circumstances, or issues in the Requests, and are without prejudice to Plaintiff's right to dispute facts and legal conclusions assumed in the Requests.

16. These objections and responses are based on Plaintiff's present knowledge, information, and belief, and therefore remain subject to change or modification based on further

discovery of facts or circumstances that may come to Plaintiff's attention. Plaintiff reserves the right to rely on any facts, documents, evidence, or other contentions that may develop or come to its attention at a later time and to supplement or amend the responses at any time prior to the trial. Plaintiff further reserves the right to raise any additional objections deemed necessary or appropriate in light of any further review.

OBJECTIONS TO INSTRUCTIONS AND DEFINITIONS

Instructions

1. In accordance with the Rules of this Court, You shall answer the following Requests separately and fully, in writing.

RESPONSE: No objection.

2. Where information in Your possession is requested, such request includes nonprivileged information in the possession of Your agent(s), employee(s), assign(s), representative(s), and all others acting on Your behalf.

RESPONSE: Plaintiff objects to this instruction as overly broad and unduly burdensome, to the extent that it requires production of documents from individuals not under Plaintiff's control. Plaintiff will produce documents from a limited number of custodians to be negotiated with Defendant in good faith.

3. Whenever appropriate in these Requests, the singular form of a word shall be interpreted as its plural to whatever extent is necessary to bring within the scope of these Requests any information which might otherwise be construed to be outside their scope.

RESPONSE: No objection.

4. Unless otherwise indicated, these Requests refer to the time, place, and circumstances of the occurrences mentioned or complained of in the pleadings in this case.

RESPONSE: Plaintiff objects to this instruction as overly broad and unduly burdensome, to the extent that it requires production of documents not within the possession, custody or control of Plaintiff. Plaintiff will produce documents from

a relevant time period to be negotiated with Defendant in good faith. Plaintiff further objects to this instruction as vague and ambiguous.

5. All references to an entity include the entity and its agents, officers, employees, representatives, subsidiaries, divisions, successors, predecessors, assigns, parents, affiliates, and unless privileged, its attorneys and accountants

RESPONSE: Plaintiff objects to this instruction as overly broad and unduly burdensome, to the extent that it requires production of documents from individuals and entities other than Plaintiff and/or documents that are not within Plaintiff's custody and control, and/or production of documents by or relating to entities not specifically referenced in the Requests below.

6. If You perceive any ambiguities in a question, instruction, definition, or other aspect of these discovery requests, set forth the matter deemed ambiguous and the construction used in answering.

RESPONSE: No objection.

7. If You assert a claim of privilege as to any of Your responses to the Requests, state the basis for the asserted privilege, specify the privilege claimed, and include in Your answer sufficient information to permit the Court to make an informed ruling on the claim of privilege. If the claim relates to a privileged document, state the date, person or persons who prepared or participated in preparing the document, the name and address of any person to whom the document was shown or sent, the general subject matter of the document, the present or last known location and custodian of the original of the document, and the basis for the claim of privilege with respect to the document. If the claim of privilege relates to a communication, state the date(s), place(s) and person(s) involved in the communication, the subject matter of the communication, and the basis for the claim of privilege with respect to that communication. Reliance on any claim of privilege is subject to the Rules of this Court, including the production of a privilege log.

RESPONSE: Plaintiff objects to this instruction as overly broad and unduly burdensome, to the extent that it requires Plaintiff to produce a privilege log in a specific manner at a specific time. Plaintiff will produce a privilege log at a time and in a manner to be negotiated with Defendant in good faith.

8. If You perceive any Request to be overly broad, unduly burdensome, or objectionable for any other reason, respond to the fullest extent possible and clearly note any objection so that the Court will be permitted to make an informed ruling on the objection.

RESPONSE: No objection.

9. These Requests are continuing in character so as to require You to promptly amend or supplement Your responses in accordance with the Rules of the Supreme Court of Virginia within a reasonable time if You obtain or become aware of any further information responsive to these Requests. Ms. Heard reserves the right to propound additional Requests.

RESPONSE: No objection.

10. Unless otherwise indicated, these requests include the time from when the parties met, in 2008.

RESPONSE: Plaintiff objects to this instruction as overly broad, unduly burdensome, and harassing to the extent that it purports to require Plaintiff to produce documents from a twelve-year timeframe that encompasses documents that are not relevant to the subject matter of this action.

Definitions

a. ***Action.*** The term “Action” means the above-captioned action.

RESPONSE: No objection.

b. ***Communication.*** The term “communication” means any oral or written exchange of words, thoughts, or ideas to another person, whether person-to-person, in a group, by phone, text (SMS), letter, fax, e-mail, internet post or correspondence, social networking post or correspondence or by any other process, electric, electronic, or otherwise. All such

Communications are included without regard to the storage or transmission medium (electronically stored information and hard copies are included within this definition)

RESPONSE: No objection.

c. ***Document.*** The term “document” is defined in its broadest terms currently recognized. The term shall include, without limitations: any written or other compilation of information (whether printed, handwritten, recorded, or encoded, produced, reproduced, or reproducible by any other process), drafts (revisions or finals), original or preliminary notes, and summaries of other documents, communications of any type (e-mail, text messages, blog posts, social media posts or other similar communications or correspondence), computer tape, computer files, and including all of their contents and attached files. The term “document” shall also include but not be limited to: correspondence, memoranda, contractual documents, specifications, drawings, photographs, images, aperture cards, notices of revisions, test reports, inspection reports, evaluations, technical reports, schedules, agreements, reports, studies, analyses, projections, forecasts, summaries, records of conversations or interviews, minutes or records of conferences or meetings, manuals, handbooks, brochures, pamphlets, advertisements, circulars, press releases, financial statements, calendars, diaries, trip reports, etc. A draft of a non-identical copy is a separate document within the meaning of this term.

RESPONSE: Plaintiff objects to this definition as overly broad and unduly burdensome, and to the extent that it seeks to impose burdens beyond what are required by the Rules.

d. ***Correspondence.*** The term “correspondence” means any document(s) and/or communication(s) sent to or received from another entity and/or person

RESPONSE: Plaintiff objects to this definition as overly broad and unduly burdensome, to the extent that it is duplicative of the terms Document and Communication, and to the extent that it seeks to impose burdens beyond what are required by the Rules.

e. **Person.** The term “person” is defined as any natural person, business, company, partnership, legal entity, governmental entity, and/or association.

RESPONSE: No objection.

f. **Concerning.** The term “concerning” includes relating to, referring to, describing, evidencing, or constituting.

RESPONSE: No objection.

g. **Including.** The term “including” means including but not limited to.

RESPONSE: No objection

h. **And/or.** The use of “and/or” shall be interpreted in every instance both conjunctively and disjunctively in order to bring within the scope of these discovery requests any information which might otherwise be construed to be outside their scope.

RESPONSE: No objection.

i. **Defendant and/or Ms. Heard.** The terms “Defendant” and/or “Ms. Heard” refer to Defendant Amber Laura Heard, including her agents, representatives, employees, assigns, and unless privileged, all persons acting on her behalf.

RESPONSE: Plaintiff objects to this definition as overly broad and unduly burdensome, to the extent that it is inclusive of “agents, representatives, employees, assigns, and unless privileged, all persons acting on her behalf”

j. **Plaintiff and/or Mr. Depp.** The terms “Plaintiff” and/or “Mr. Depp” refer to Plaintiff John C. Depp, II, including his agents, representatives, employees, assigns, and all persons acting on his behalf.

RESPONSE: Plaintiff objects to this definition as overly broad and unduly burdensome, to the extent that it is inclusive of “agents, representatives, employees, assigns, and all persons acting on his behalf.” Plaintiff will interpret this term to exclude all privileged communications and documents.

k. *Complaint.* The term “Complaint” shall mean the Complaint filed by Plaintiff in this Action.

RESPONSE: No objection.

l. *You and/or Your.* The terms “You” and/or “Your” refer to the recipient(s) of these discovery requests, as well as all persons and entities over which said recipient has “control” as understood by the Rules of this Court.

RESPONSE: No objection.

REQUESTS

1. All telephone records and all text messages for the period January 2012-present.

RESPONSE:

Plaintiff repeats and incorporates by this reference the above-stated General Objections and Objections to Definitions and Instructions as though set forth in full. Plaintiff further objects to this Request on the grounds that it seeks documents that are neither relevant nor reasonably calculated to lead to the discovery of admissible evidence, because, among other reasons, it seeks “all telephone records and text messages” without any limitations as to subject matter and without any attempt to tailor the scope of this Request to documents that might be relevant to the subject matter of this action. Plaintiff further objects to this Request on the grounds that it is overly broad, unduly burdensome, and harassing, because it seeks documents over a nearly 9-year period, without any appropriate limitations as to scope and subject matter. Plaintiff further objects to this Request on the grounds that it seeks documents protected by the attorney-client privilege. Plaintiff further objects to this Request on the grounds that it seeks documents protected by the work-product doctrine. Plaintiff further objects to this Request on the grounds that it seeks confidential, proprietary, and private personal and/or business information of Plaintiff and third parties to this action, which are not subject to discovery in this action.

Defendant is not entitled to every private text message Plaintiff sent or received over a period of more than 9 years. Plaintiff further objects to this Request to the extent that it implicates any applicable privilege, immunity, or protection. Plaintiff further objects to this Request on the grounds that due to its unlimited scope and lack of any nexus to the subject matter of this action, it appears calculated to harass.

Accordingly, Plaintiff will not produce documents in response to this Request.

2. All photographs taken of the rented home in Australia during the period March 1, 2015-March 15, 2015, with or without property damage, and all communications with the homeowner, the lease agreement, the full address, and all payments made to pay for the rent, as well as any damages, by whom paid, the amounts, any receipts and proof of payments, and dates.

RESPONSE:

Plaintiff repeats and incorporates by this reference the above-stated General Objections and Objections to Definitions and Instructions as though set forth in full. Plaintiff further objects to this Request on the grounds that it seeks documents that are neither relevant nor reasonably calculated to lead to the discovery of admissible evidence. Plaintiff further objects to this Request on the grounds that it is overly broad, unduly burdensome, and harassing, because it seeks documents unconnected to the claims and defenses in this action regarding the relationship between Plaintiff and Defendant. Plaintiff further objects to this Request to the extent that it seeks documents protected by the attorney-client privilege, the work-product doctrine, and/or any other applicable privilege, immunity, or protection. Plaintiff further objects to this Request on the grounds that it seeks confidential, proprietary, and private personal and/or business information of Plaintiff and third parties to this action, which are not subject to discovery in this action. Plaintiff further objects to this Request on the grounds that it is vague and ambiguous, including as to the terms "the rented home in Australia."

Subject to, and without waiver of the above-stated objections, Plaintiff will produce non-privileged documents and communications, if any, evidencing property damage at the rented home in Australia, and any payments made in connection with any such property damage.

3. All communications with the owner of the Australian house, Mick Doohan, from the period September 1, 2014 through September 1, 2017.

RESPONSE:

Plaintiff repeats and incorporates by this reference the above-stated General Objections and Objections to Definitions and Instructions as though set forth in full. Plaintiff further objects to this Request on the grounds that it seeks documents that are neither relevant nor reasonably calculated to lead to the discovery of admissible evidence, as it is not tailored to the subject matter of this action. Plaintiff further objects to this Request on the grounds that it is overly broad, unduly burdensome, and harassing, because it seeks documents unconnected to the claims and defenses in this action regarding the relationship between Plaintiff and Defendant, and is unlimited in scope. Plaintiff further objects to this Request to the extent that it seeks documents protected by the attorney-client privilege, the work-product doctrine, and/or any other applicable privilege, immunity, or protection. Plaintiff further objects to this Request to the extent that it seeks confidential, proprietary, and private personal and/or business information of Plaintiff and third parties to this action. Plaintiff further objects to this Request on the grounds that it is vague and ambiguous, including as to the term "Australian house."

Accordingly, Plaintiff will not produce documents in response to this Request.

4. All receipts, invoices, descriptions of work, and records of payment for any cleaning, repair or replacement of any aspect of the Australian home owned by Mick Doohan and rented by Mr. Depp in 2015.

RESPONSE:

Plaintiff repeats and incorporates by this reference the above-stated General Objections and Objections to Definitions and Instructions as though set forth in full. Plaintiff further objects to this Request on the grounds that it seeks documents that are neither relevant nor reasonably calculated to lead to the discovery of admissible evidence, as it is not tailored to the subject matter of this action. Plaintiff further objects to this Request on the grounds that it is overly broad, unduly burdensome, and harassing, because it seeks documents unconnected to the claims and defenses in this action regarding the relationship between Plaintiff and Defendant. Plaintiff further objects to this Request to the extent that it seeks documents protected by the attorney-client privilege, the work-product doctrine, and/or any other applicable privilege, immunity, or protection. Plaintiff further objects to this Request to the extent that it seeks confidential, proprietary, and private personal and/or business information of Plaintiff and third parties to this action.

Subject to, and without waiver of the above-stated objections, Plaintiff will produce non-privileged documents and communications, if any, evidencing property damage at the rented home in Australia, and any payments made in connection with any such property damage.

5 Mr. Depp and Ms. Heard's shared notebook/diary, unredacted.

RESPONSE:

Plaintiff repeats and incorporates by this reference the above-stated General Objections and Objections to Definitions and Instructions as though set forth in full. Plaintiff further objects to this Request to the extent that it seeks confidential, proprietary, and private personal and/or business information of Plaintiff and third parties to this action. Responding Party further objects to this Request on the grounds that it is vague and ambiguous as to the term "notebook/diary." Responding Party further objects to this Request on the grounds that it seeks

materials that are neither relevant nor reasonably calculated to lead to the discovery of admissible evidence.

Subject to, and without waiver of the above-stated objections, Responding Party will produce non-privileged materials responsive to this Request.

6. All documents reflecting all efforts by Mr. Depp, or on his behalf, to preserve all video footage from Eastern Columbia Building during the week of May 21, 2016-May 28, 2016.

RESPONSE:

Plaintiff repeats and incorporates by this reference the above-stated General Objections and Objections to Definitions and Instructions as though set forth in full. Plaintiff further objects to this Request on the grounds that it seeks documents that are neither relevant nor reasonably calculated to lead to the discovery of admissible evidence. Plaintiff further objects to this Request on the grounds that it seeks documents protected by the attorney-client privilege. Plaintiff further objects to this Request on the grounds that it seeks documents protected by the work-product doctrine. Plaintiff further objects to this Request on the grounds that it seeks confidential, proprietary, and private personal and/or business information of Plaintiff and third parties to this action, which are not subject to discovery in this action. Plaintiff further objects to this Request to the extent that it implicates any applicable privilege, immunity, or protection.

Accordingly, Plaintiff will not produce documents in response to this Request.

7. All documents supporting in any manner the allegation of the “fake punch” incident as specifically alleged in Paragraph 54 of Complaint.

RESPONSE:

Plaintiff repeats and incorporates by this reference the above-stated General Objections and Objections to Definitions and Instructions as though set forth in full. Plaintiff further objects to this Request on the grounds that it seeks documents protected by the attorney-client privilege.

Plaintiff further objects to this Request on the grounds that it seeks documents protected by the work-product doctrine. Plaintiff further objects to this Request on the grounds that it is overly broad, vague, and ambiguous, including as to the phrase "support in any manner."

Plaintiff further objects to this Request to the extent that it implicates any applicable privilege, immunity, or protection.

Subject to, and without waiver of the above-stated objections, Responding Party will produce non-privileged documents responsive to this Request.

8. All communications and drafts relating in any manner to any pre-nuptial agreement between Mr. Depp and Ms. Heard.

RESPONSE:

Plaintiff repeats and incorporates by this reference the above-stated General Objections and Objections to Definitions and Instructions as though set forth in full. Plaintiff further objects to this Request on the grounds that it seeks documents that are neither relevant nor reasonably calculated to lead to the discovery of admissible evidence. Plaintiff further objects to this Request on the grounds that it seeks documents protected by the attorney-client privilege. Plaintiff further objects to this Request on the grounds that it seeks documents protected by the work-product doctrine, including and especially to the extent that it seeks drafts of legal documents prepared by Plaintiff's attorneys. Plaintiff further objects to this Request on the grounds that it seeks confidential, proprietary, and private personal and/or business information. Plaintiff further objects to this Request to the extent that it implicates any applicable privilege, immunity, or protection. Plaintiff further objects to this Request on the grounds that it seeks documents that are already in Defendant's possession and/or are equally available to Defendant

Accordingly, Plaintiff will not produce documents in response to this Request.

9. All communications and drafts relating in any manner to any post-nuptial agreement between Mr. Depp and Ms. Heard.

RESPONSE:

Plaintiff repeats and incorporates by this reference the above-stated General Objections and Objections to Definitions and Instructions as though set forth in full. Plaintiff further objects to this Request on the grounds that it seeks documents that are neither relevant nor reasonably calculated to lead to the discovery of admissible evidence. Plaintiff further objects to this Request on the grounds that it seeks documents protected by the attorney-client privilege. Plaintiff further objects to this Request on the grounds that it seeks documents protected by the work-product doctrine. Plaintiff further objects to this Request on the grounds that it seeks confidential, proprietary, and private personal and/or business information. Plaintiff further objects to this Request to the extent that it implicates any applicable privilege, immunity, or protection. Plaintiff further objects to this Request on the grounds that it seeks documents that are already in Defendant's possession and/or are equally available to Defendant.

Accordingly, Plaintiff will not produce documents in response to this Request.

10. Copies of all Wills of Mr. Depp during the period of the marriage with Ms. Heard.

RESPONSE:

Plaintiff repeats and incorporates by this reference the above-stated General Objections and Objections to Definitions and Instructions as though set forth in full. Plaintiff further objects to this Request on the grounds that it seeks documents that are neither relevant nor reasonably calculated to lead to the discovery of admissible evidence, because, among other reasons, Plaintiff's estate planning is not at issue in this action. Plaintiff further objects to this Request on the grounds that it is overly broad, unduly burdensome, and harassing. Plaintiff further objects to this Request on the grounds and to the extent that it seeks documents protected by the attorney-client privilege, the work-product doctrine, and any other applicable privilege, immunity, or protection. Plaintiff further objects to this Request on the grounds that it seeks confidential,

proprietary, and private personal and/or business information of Plaintiff and third parties to this action, which are not subject to discovery in this action, including protected financial and estate-planning information.

Accordingly, Plaintiff will not produce documents in response to this Request

11. All records of the Hicksville trip, including but not limited to, the reservations, pictures and descriptions of accommodations, any pictures of damage to property, all receipts, records of payment and communications relating to the stay, all monies paid, and the reasons for such payments.

RESPONSE:

Plaintiff repeats and incorporates by this reference the above-stated General Objections and Objections to Definitions and Instructions as though set forth in full. Plaintiff further objects to this Request on the grounds that it seeks documents that are neither relevant nor reasonably calculated to lead to the discovery of admissible evidence. Plaintiff further objects to this Request on the grounds that it is overly broad, unduly burdensome, and harassing on its face, because, among other reasons, it seeks a vast array of documents that have no legitimate nexus to this action, including a blanket request for "all monies paid," for any reason, "the reasons for such payments," and "all receipts," without any appropriate limitations as to scope. Plaintiff further objects to this Request on the grounds that it seeks documents protected by the attorney-client privilege. Plaintiff further objects to this Request on the grounds that it seeks documents protected by the work-product doctrine. Plaintiff further objects to this Request on the grounds that it seeks confidential, proprietary, and private personal and/or business information. Plaintiff further objects to this Request to the extent that it implicates any applicable privilege, immunity, or protection. Plaintiff further objects to this Request on the grounds that it is vague and ambiguous, including as to the meaning of the term "the Hicksville trip," which is not defined.

Accordingly, Plaintiff will not produce documents in response to this Request.

12. Copies of all communications with the hotel in NYC, believed to be the Mark Hotel, in which Mr. Depp stayed with Ms. Kate Moss, including documents and communications relating to the reservations, property damage, receipts, records of payments, and the criminal charges and resolution.

RESPONSE:

Plaintiff repeats and incorporates by this reference the above-stated General Objections and Objections to Definitions and Instructions as though set forth in full. Plaintiff further objects to this Request on the grounds that it seeks documents that are neither relevant nor reasonably calculated to lead to the discovery of admissible evidence and is not tailored to the subject matter of this action. Plaintiff further objects to this Request on the grounds that it is overly broad, unduly burdensome, and harassing on its face, because, among other reasons, it seeks a wide array of documents that have no legitimate nexus to this action, including a blanket request for “all communications,” “records of payments,” and “receipts,” without any appropriate limitations as to scope or time. Plaintiff further objects to this Request to the extent that it could be construed to seek documents protected by the attorney-client privilege, the work-product doctrine, or any other applicable privilege, immunity, or protection. Plaintiff further objects to this Request on the grounds that it seeks confidential, proprietary, and private personal and/or business information. Plaintiff further objects to this Request on the grounds that it is vague and ambiguous, including as to the meaning of the terms “the hotel in NYC,” “the reservations,” and “the criminal charges and resolution,” none of which terms are defined.

Accordingly, Plaintiff will not produce documents in response to this Request.

13. All communications with any third party, including the press, relating to the reasons for Mr. Depp’s upset leading to the property damage at the NYC hotel, including any efforts to “correct” any prior representations.

RESPONSE:

Plaintiff repeats and incorporates by this reference the above-stated General Objections and Objections to Definitions and Instructions as though set forth in full. Plaintiff further objects to this Request on the grounds that it seeks documents that are neither relevant nor reasonably calculated to lead to the discovery of admissible evidence. Plaintiff further objects to this Request on the grounds that it is overly broad, unduly burdensome, and harassing. Plaintiff further objects to this Request on the grounds that it seeks documents protected by the attorney-client privilege. Plaintiff further objects to this Request on the grounds that it seeks documents protected by the work-product doctrine. Plaintiff further objects to this Request on the grounds that it seeks confidential, proprietary, and private personal and/or business information. Plaintiff further objects to this Request to the extent that it implicates any applicable privilege, immunity, or protection. Plaintiff further objects to this Request on the grounds that it is vague and ambiguous, including as to the meaning of the terms "Mr. Depp's upset," "the property damage at the NYC hotel," which terms are not defined. Plaintiff further objects to this Request on the grounds that it assumes facts not in evidence and lacks foundation for the same.

Accordingly, Plaintiff will not produce documents in response to this Request.

14. All communications by Mr. Depp, Mr. Waldman, or anyone on Mr. Depp's behalf, to any member of the press, or any twitter account or other social media account or the holder or owner of such accounts.

RESPONSE:

Plaintiff repeats and incorporates by this reference the above-stated General Objections and Objections to Definitions and Instructions as though set forth in full. Plaintiff further objects to this Request on the grounds that it seeks documents that are neither relevant nor reasonably calculated to lead to the discovery of admissible evidence, because, among other reasons, it seeks "all communications" by Plaintiff, one of his attorneys, or anyone acting on Plaintiff's behalf, with any member of the press or anyone with a social media account, on any topic whatsoever,

and without any limitations as to time. No reasonable attempt has been made to tailor this Request to seek documents relevant to this action. Plaintiff further objects to this Request on the grounds that it is overly broad, unduly burdensome, and harassing on its face, because, among other reasons, it seeks any and all communications with third parties including the press or any holder of a social media account, without any appropriate limitations as to scope and subject matter. Plaintiff further objects to this Request on the grounds that it seeks documents protected by the attorney-client privilege. Plaintiff further objects to this Request on the grounds that it seeks documents protected by the work-product doctrine. Plaintiff further objects to this Request on the grounds that it seeks confidential, proprietary, and private personal and/or business information of Plaintiff and third parties to this action, which are not subject to discovery in this action. Plaintiff further objects to this Request to the extent that it implicates any applicable privilege, immunity, or protection. Plaintiff further objects to this Request on the grounds and to the extent it seeks documents and communications by persons other than Plaintiff. Plaintiff further objects to this Request on the grounds that due to its unlimited scope and lack of any nexus to the subject matter of this action, it appears calculated to harass.

Accordingly, Plaintiff will not produce documents in response to this Request.

- 15 All communications by Mr. Depp, Mr. Waldman, or anyone on Mr. Depp's behalf, to any member of social media.

RESPONSE:

Plaintiff repeats and incorporates by this reference the above-stated General Objections and Objections to Definitions and Instructions as though set forth in full. Plaintiff further objects to this Request on the grounds that it seeks documents that are neither relevant nor reasonably calculated to lead to the discovery of admissible evidence, because, among other reasons, it seeks "all communications" by Plaintiff, one of his attorneys, or anyone acting on Plaintiff's behalf,

with anyone with a social media account, on any topic whatsoever, and without any limitations as to time. No reasonable attempt has been made to tailor this Request to seek documents relevant to this action. Plaintiff further objects to this Request on the grounds that it is overly broad, unduly burdensome, and harassing on its face, because, among other reasons, it seeks any and all communications with any holder of a social media account, without any appropriate limitations as to scope and subject matter. Plaintiff further objects to this Request on the grounds that it seeks documents protected by the attorney-client privilege. Plaintiff further objects to this Request on the grounds that it seeks documents protected by the work-product doctrine. Plaintiff further objects to this Request on the grounds that it seeks confidential, proprietary, and private personal and/or business information of Plaintiff and third parties to this action, which are not subject to discovery in this action. Plaintiff further objects to this Request to the extent that it implicates any applicable privilege, immunity, or protection. Plaintiff further objects to this Request on the grounds and to the extent it seeks documents and communications by persons other than Plaintiff. Plaintiff further objects to this Request on the grounds that it is vague and ambiguous, including as to the phrase "member of social media." Plaintiff further objects to this Request on the grounds that due to its unlimited scope and lack of any nexus to the subject matter of this action, it appears calculated to harass.

Accordingly, Plaintiff will not produce documents in response to this Request.

16. All documents, including photographs, invoices, descriptions of work, receipts and records of payments for any repairs to the bed located in Penthouse 3 of the Eastern Columbia Building, at any time during the year 2016.

RESPONSE:

Plaintiff repeats and incorporates by this reference the above-stated General Objections and Objections to Definitions and Instructions as though set forth in full. Plaintiff further objects to this Request on the grounds that it seeks documents that are neither relevant nor reasonably

calculated to lead to the discovery of admissible evidence. Plaintiff further objects to this Request on the grounds that it is overly broad, unduly burdensome, and harassing. Plaintiff further objects to this Request on the grounds that it seeks documents protected by the attorney-client privilege. Plaintiff further objects to this Request on the grounds that it seeks documents protected by the work-product doctrine. Plaintiff further objects to this Request on the grounds that it seeks confidential, proprietary, and private personal and/or business information. Plaintiff further objects to this Request to the extent that it implicates any applicable privilege, immunity, or protection. Plaintiff further objects to this Request on the grounds that it is vague and ambiguous, including as to the phrase "all documents," which does not specify the subject matter of the Request.

Subject to and without waiver of the above-stated objections, Plaintiff will produce non-privileged documents evidencing any repairs to the bed located at Penthouse 3 of the Eastern Columbia Building during the year 2016

Dated: August 3, 2020

Respectfully submitted,



Benjamin G. Chew (VSB #29113)
Camille M. Vasquez (*pro hac vice*)
Andrew C. Crawford (VSB #89093)
BROWN RUDNICK, LLP
601 Thirteenth Street NW, Suite 600
Washington, DC 20005
Phone: (202) 536-1785
Fax: (617) 289-0717
bchew@brownrudnick.com

- and -

Adam R. Waldman
THE ENDEAVOR GROUP LAW FIRM, P.C.
1775 Pennsylvania Avenue NW, Suite 350
Washington, DC 20006

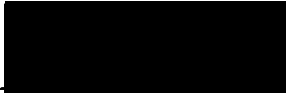
Counsel for Plaintiff John C Depp, II

CERTIFICATE OF SERVICE

I hereby certify that on this 30 day of August, 2020, I caused copies of the foregoing to be served via email (per written agreement between the Parties) on the following:

A. Benjamin Rottenborn (VSB No. 84796)
Joshua R. Treece (VSB No. 79149)
WOODS ROGERS PLC
10 S Jefferson Street, Suite 1400
P.O. Box 14125
Roanoke, Virginia 24011
Telephone. (540) 983-7540
brottenborn@woodsrogers.com
jtreece@woodsrogers.com

Elaine Charlson Bredehoft (VSB No. 23766)
Carla D. Brown (VSB No. 44803)
Adam S. Nadellaft (VSB No. 91717)
David E. Murphy (VSB No. 90938)
CHARLSON BREDEHOFT COHEN &
BROWN, P.C.
11260 Roger Bacon Dr., Suite 201
Reston, VA 20190
Phone: 703-318-6800
Fax. 703-318-6808
ebredehoft@cbcbllaw.com
cbrown@cbcbllaw.com
anadellaft@cbcbllaw.com
dmurphy@cbcbllaw.com


Benjamin G. Chew

ATTACHMENT 3

VIRGINIA:

IN THE CIRCUIT COURT OF FAIRFAX COUNTY

JOHN C. DEPP, II,

Plaintiff,

v.

AMBER LAURA HEARD,

Defendant.

Civil Action No.: CL-2019-0002911

**CONSENT ORDER RESPECTING PLAINTIFF'S RESPONSES TO
FOURTH, FIFTH, SIXTH AND SEVENTH REQUEST FOR DOCUMENTS**

Plaintiff John C. Depp, II, and Defendant Amber Laura Heard, by counsel, having engaged in extensive meet and confers respecting Defendant's Fourth, Fifth, Sixth and Seventh Requests for Production and Plaintiff having consented to an Order respecting certain of these discovery requests, as evidenced by their signatures below, it is hereby:

ORDERED that Plaintiff shall produce all non-privileged documents and for any claimed privileges, will produce a privilege log simultaneous with the production of the other recording, responsive to the following Requests:

Fourth Requests for Production of Documents (served July 2, 2020) Nos. 1-2, 3 (revised to "All non-privileged communications between Mr. Waldman and any person or entity referring to or relating in any manner to Ms. Heard from the date Mr. Waldman was engaged to represent Mr. Depp in this litigation to present"), 4-5, 6 (revised to "Any non-privileged statements made by or on behalf of Mr. Waldman relating to Ms. Heard's 2016 Domestic Violence Restraining Order, Ms. Heard's or Mr. Depp's evidence and testimony related thereto, allegations of domestic abuse by Ms. Heard or Mr. Depp, any claim that such allegations are false or part of a fraud or hoax, injuries Mr. Depp is alleged to have caused to Ms. Heard, injuries or damages Ms. Heard is alleged to have caused to Mr. Depp, and/or the claims, counterclaims, defenses or allegations in this lawsuit from May 21, 2016 through the present'), 7-9, 10 (revised to "All documents between or among Mr. Depp or any representative of Mr. Depp, and Christi Dembrowski, Ben King, Kevin Murphy, Jerry Judge, Nathan Holmes, Malcolm Connelly, Steven Deuters, any other security for Mr. Depp, house personnel, housekeeping, and personal assistant

staff, that refer or relate to Mr. Depp's substance or alcohol abuse or treatment, Mr. Depp's acts of physical violence, Mr. Depp's destruction of property, Ms. Heard's 2016 Domestic Violence Restraining Order, evidence or testimony related thereto, allegations of physical or nonphysical abuse by Ms. Heard or Mr. Depp, allegations that these are false, part of a hoax or fraud, and/or that otherwise refer or relate to the claims, counterclaims, defenses or allegations in this lawsuit during the following date periods: January 1 - March 30, 2013; June 27-July 7, 2013; May 1-May 31, 2014; August 1-September 15, 2014; December 1, 2014-January 3, 2015; January 20 - February 12, 2015; March 1- March 30, 2015; July 15-August 5, 2015; November 20, 2015-December 31, 2015; April 15, 2016-April 11-13 and 1515-August 5, 2015; November 20, 2015-December 31, 2015; April 15, 2016-April 30, 2016; May 3, 2016-May 21, 2016; May 22, 2016 through present"), 11-13 and 15;

Fifth Requests for Production of Documents (served July 10, 2020) Nos. 1 (revised to "All telephone records and all text messages for the period January 2012-present that refer or relate to Mr. Depp's substance or alcohol abuse or treatment, Mr. Depp's acts of physical violence, Mr. Depp's destruction of property, Ms. Heard's 2016 Domestic Violence Restraining Order, evidence or testimony related thereto, allegations of physical or nonphysical abuse by Ms. Heard or Mr. Depp, and/or that otherwise refer or relate to the claims, counterclaims, defenses or allegations in this lawsuit"), 2, 3 (revised to "All communications with the owner of the Australian house, Mick Doohan, from the period September 1, 2014 through September 1, 2017 that refer or relate to Mr. Depp's substance or alcohol use, Mr. Depp's acts of physical violence, Mr. Depp's destruction of property, Mr. Depp's finger injury, Mr. Doohan's documentary, and/or otherwise refer or relate to the claims, counterclaims, defenses or allegations in this lawsuit"), 4-9, 11, 14 (revised to "All communications by Mr. Depp, Mr. Waldman, or anyone on Mr. Depp's behalf, to any member of the press, or any twitter account or other social media account or the holder or owner of such accounts from May 21, 2016 through the present that refer or relate to the 2016 Domestic Violence Restraining Order, Ms. Heard's or Mr. Depp's evidence and testimony related thereto, allegations of domestic abuse by Ms. Heard or Mr. Depp, injuries Mr. Depp is alleged to have caused to Ms. Heard, injuries or damages Ms. Heard is alleged to have caused to Mr. Depp, and/or the claims, counterclaims, defenses or allegations in this lawsuit"), 15 (revised to "All communications by Mr. Depp, Mr. Waldman, or anyone on Mr. Depp's behalf, to any member of social media from May 21, 2016 through the present that refer or relate to the 2016 Domestic Violence Restraining Order, Ms. Heard's or Mr. Depp's evidence and testimony related thereto, allegations of domestic abuse by Ms. Heard or Mr. Depp, any claim that such allegations are false or part of a fraud or hoax, injuries Mr. Depp is alleged to have caused to Ms. Heard, injuries or damages Ms. Heard is alleged to have caused to Mr. Depp, and/or the claims, counterclaims, defenses or allegations in this lawsuit"), and 16;

Sixth Requests for Production of Documents (served July 17, 2020) Nos. 1 (revised to "Documents sufficient to reflect the full amount of earnings, including income, royalties, brand income, and other sources of income, of Mr. Depp,

during the marriage between Mr. Depp and Ms. Heard”), 7, 8 (modified to “relating to Ms. Heard”), 10 (modified to “relating to Ms. Heard”), 11-22.

Seventh Requests for Production of Documents (served July 24, 2020) Nos. 2,4, 8-10;

and it is further

ORDERED that all documents shall be produced no later than Friday, September 4, 2020, 5 PM EST; and it is further

ORDERED that any responsive documents in the possession, custody and control of Plaintiff must be produced by 5:00 PM EST on September 4, 2020, Plaintiff may not produce documents on a rolling basis, and if Plaintiff does not timely produce responsive documents, they will not be permitted to be used in any deposition or at the trial of this matter.

Date: _____

The Honorable Bruce D. White
Chief Judge, Fairfax County Circuit Court

WE ASK FOR THIS:

Elaine Charlson Bredehoft (VSB No. 23766)
Adam S. Nadelhaft (VSB No. 91717)
David E. Murphy (VSB No. 90938)
Charlson Bredehoft Cohen & Brown, P.C.
11260 Roger Bacon Drive, Suite 201
Reston, Virginia 20190
Telephone: (703) 318-6800
ebredehoft@cbcblaw.com
anadelhaft@cbcblaw.com
dmurphy@cbcblaw.com

J. Benjamin Rottenborn (VSB No. 84796)
Joshua R. Treece (VSB No. 79149)
WOODS ROGERS PLC
10 S. Jefferson Street, Suite 1400
P.O. Box 14125
Roanoke, Virginia 24011
Telephone: (540) 983-7540
brotenborn@woodsrogers.com
jtreece@woodsrogers.com

Counsel to Defendant Amber Laura Heard

SEEN AND CONSENTED TO:

Benjamin G. Chew (VSB 29113)
Andrew C. Crawford (VSB 89093)
BROWN RUDNICK LLP
601 Thirteenth Street, N.W.
Washington, D.C. 20005
Telephone: (202) 536-1700
Facsimile: (202) 536-1701
bchew@brownrudnick.com
acrawford@brownrudnick.com

Camille M. Vasquez (admitted *pro hac vice*)
BROWN RUDNICK LLP
2211 Michelson Drive
Irvine, CA 92612
Telephone: (949) 752-7100
Facsimile: (949) 252-1514
cvasquez@brownrudnick.com

Adam R. Waldman
THE ENDEAVOR LAW FIRM, P.C.
1775 Pennsylvania Avenue, N.W., Suite 350
Washington, DC 20006
awaldman@theendevorgroup.com

Counsel for Plaintiff John C. Depp, II

ATTACHMENT 4



VIRGINIA:

IN THE CIRCUIT COURT OF FAIRFAX COUNTY

JOHN C. DEPP, II

Plaintiff,

v.

AMBER LAURA HEARD

Defendant.

Civil Action No.: CL-2019-0002911

ORDER

100 ENU. 8-11-20

THIS CAUSE comes at the request of Defendant Amber Laura Heard, by counsel, who has filed a Motion to Compel Production of Documents, Interrogatory Responses & Enforce this Court's October 18, 2019 Order against Plaintiff John C. Depp, II ("Defendant's Motion"). Having reviewed the parties' pleadings and heard their argument on this matter, it is hereby:

ORDERED that Defendant's Motion is **GRANTED in part and DENIED in part** as set forth below. On or before 5 p.m. on August 14, 2020, Plaintiff shall:

- (1) produce to Ms. Heard all documents (including any metadata) produced in the *Depp v. News Group Newspapers Limited, et al.* case in London, QB-2018-006323 (the "NGN Case");
- (2) produce to Ms. Heard all trial bundles from the NGN Case;
- (3) produce to Ms. Heard all documents Plaintiff, his counsel or anyone acting on his behalf or in concert with Plaintiff, have provided, distributed, or otherwise transmitted to the press, both digital and paper-based, and/or social media users, including but not limited to those documents outlined in Ms. Heard's Motion and Section B of Ms. Heard's Memorandum in Support, to the extent they exist in Plaintiff's "possession, custody, or control" as defined in Va. Sup. Ct. R. 4:9(a),

even if such documents are not presently in the possession, custody, and control of Plaintiff's counsel;

(4) supplement Plaintiff's answers to Interrogatory Nos. 11, 14 and 16; and

(5) produce to Ms. Heard all remaining responsive documents pursuant to this Court's October 18, 2019 Order, including, but not limited to, any and all documents and medical records that refer or relate to the finger injury Plaintiff sustained in Australia in 2015.

(6) produce documents that Plaintiff stated would be produced in response to Interrogatory Nos. 9 & 10, to the extent agreed, and not already produced by Plaintiff, though the motion to compel further answers to these interrogatories is denied.

IT IS SO ORDERED.

ENTERED this 10th day of August, 2020.



The Honorable Bruce D. White
Chief Judge, Circuit Court for the County of Fairfax

**ENDORSEMENT OF THIS ORDER BY COUNSEL OF RECORD FOR THE PARTIES IS
WAIVED IN THE DISCRETION OF THE COURT PURSUANT TO RULE 1:13 OF THE
SUPREME COURT OF VIRGINIA.**

ATTACHMENT 5



VIRGINIA:

IN THE CIRCUIT COURT OF FAIRFAX COUNTY

JOHN C. DEPP, II

Plaintiff,

v.

AMBER LAURA HEARD

Defendant.

Civil Action No.: CL-2019-0002911

ORDER

THIS CAUSE comes at the request of Defendant Amber Laura Heard, by counsel, who filed a Motion to Compel Production of Documents and Responses to Interrogatories and Requests for Admission against Plaintiff John C. Depp, II on July 2, 2020. Having reviewed the parties' pleadings and heard their argument on this matter, it is hereby:

ORDERED that Defendant's Motion is **GRANTED in part** and **DENIED in part** as set forth below. On or before 5 p.m. on August 21, 2020, Plaintiff shall:

(1) Supplement his Answers and substantively respond to Defendant's First Requests for Admission Nos. 11, 12, 13, 14 and 15;

(2) Produce all documents responsive to Defendant's First Request for Production Nos. 11-12;

(3) Fully supplement his Answer to Interrogatory No. 1 in Defendant's First Set of Interrogatories to Plaintiff for all persons with knowledge of any information relating to claims and defenses, including but not limited to all known addresses, email addresses and telephone numbers for all individuals identified, to the extent Plaintiff has that information within his possession, custody, or control;

NO EDD. 8-11-20

(4) Supplement his Answer to Interrogatory No. 12 in Defendant's First Set of Interrogatories to "Identify each romantic partner other than Ms. Heard that [Mr. Depp has] had in the past 10 years;"


(5) Substantively and fully respond to Interrogatory No. 1 in Defendant's Second Set of Interrogatories to identify all payments, gifts or transfers of value, in monetary form, to the identified individuals and any other Romantic Partners from 2012 to present;

(6) Substantively and fully respond to Interrogatory No. 2 in Defendant's Second Set of Interrogatories to Plaintiff to identify all "fees from every Performance from 2010 to present;" and

(7) Produce all documents responsive to Defendant's Second Request for Production Nos. 10, 12 and 13.

IT IS SO ORDERED

ENTERED this 10th day of August, 2020.


Hon. Bruce D. White
Chief Judge, Fairfax Circuit Court

ENDORSEMENT OF THIS ORDER BY COUNSEL OF RECORD FOR THE PARTIES IS
WAIVED IN THE DISCRETION OF THE COURT PURSUANT TO RULE 1:13 OF THE
SUPREME COURT OF VIRGINIA.

ATTACHMENT 6

IN THE CIRCUIT COURT OF FAIRFAX COUNTY, VIRGINIA

JOHN C. DEPP, II

Plaintiff,

v.

AMBER LAURA HEARD

Defendant.

Civil Action No.: CL-2019-0002911

DECLARATION OF JOHN CHRISTOPHER DEPP, II

I, John Christopher Depp, II, declare as follows:

1. I am a party in the above-entitled action. I have firsthand, personal knowledge of the facts set forth below and if called as a witness could competently testify thereto.

2. Ms. Heard's fabricated domestic violence allegations against me are categorically and demonstrably false. I have denied Ms. Heard's allegations vehemently since she first made them in May 2016, when she walked into court to obtain a temporary restraining order with painted-on bruises that witnesses and surveillance footage show she did not possess each day of the preceding week. I will continue to deny them for the rest of my life. I never abused Ms. Heard or any other woman.

3. I am bringing this lawsuit not only to clear my name and restore my reputation, but to attempt to bring clarity to the women and men whose lives have been harmed by abuse and who have been repeatedly lied to by Ms. Heard purporting to be their spokesperson. Fortunately, there is now clear evidence from over two dozen objective third parties, including police officers, former employees and neighbors of Ms. Heard's, and 4 Eastern Columbia building personnel, supported by 87 surveillance camera videos and other written and

photographic that directly refute Ms. Heard's domestic violence allegations against me and other false assertions. The appearance of new evidence not previously in my possession was the impetus for my bringing this lawsuit because, after years of asserting my innocence, I am finally in a position to prove it by dismantling each element of her hoax. I set forth this evidence in detail below.

4 When confronted with direct evidence that exposes her domestic violence claims as a poorly executed yet surprisingly effective hoax, Ms. Heard responded by weaving more fantastical lies to prop up her false narrative that she is a domestic violence victim. Those lies too cannot withstand scrutiny and clear evidence. Ms. Heard's false narratives are dependent on the "evidence" of her word and that of her perjurious, co-conspirator friends who have chosen to assist her in her hoax. Those lies are internally inconsistent, shifting, and directly contradicted by overwhelming sworn testimonial, photographic, audio, video, and other evidence. And Ms. Heard has a documented history, of which I will submit evidence herein, of violence against men and women, of lying to courts and government agencies, and of suborning and attempting to suborn the perjurious testimony of third parties to deliver to courts.

5. Notwithstanding Ms. Heard's false domestic abuse allegations about me, there was actual, documented domestic violence in our relationship: she was the perpetrator, and I was the victim. While mixing prescription amphetamines and non-prescription drugs with alcohol, Ms. Heard committed innumerable acts of domestic violence against me, often in the presence of third party witnesses, which in some instances caused me serious bodily injury. Multiple of these commissions of violence against me she has even admitted to under oath. Multiple episodes of her violence against me are documented and supported by objective evidence, which I set forth below.

Ms. Heard's Well-Documented History And Prior Arrest For Domestic Violence

6. Ms. Heard was arrested in Seattle-Tacoma International Airport in 2009 after police officers observed her committing domestic violence against her then-wife Tasya Van Ree. Ms. Heard's wife asked police to arrest Ms. Heard. The King County prosecutor declined to charge Ms. Heard only because neither she nor her victim were residents of King County, Washington, but not before Ms. Heard spent a night in jail and appeared before a judge in court. Ms. Heard lied about this domestic violence incident under oath, saying "it was a trumped up charge and it was dropped immediately for being such." Ms. Heard also subsequently tried to minimize this arrest for domestic violence to the media, claiming that the police officers were "homophobic" and "misogynists." In fact, the arresting officer was a female, self-described lesbian activist who has publicly disputed Ms. Heard's claims about the circumstances of her arrest. *See* <https://www.tMZ.com/2016/06/07/amber-heard-domestic-violence-arrest-partner-tasya-van-ree/>; *see also* <https://people.com/movies/amber-heards-arresting-officer-speaks-out-i-am-so-not-homophobic/>

7. Throughout our relationship, Ms. Heard also committed domestic violence against me. She hit, punched, and kicked me. She also repeatedly and frequently threw objects into my body and head, including heavy bottles, soda cans, burning candles, television remote controls, and paint thinner cans, which severely injured me. As part of our divorce case, Ms. Heard was deposed on or about August 13, 2016. Ms. Heard admitted to some of these acts of violence against me in her deposition, although in the cherry-picked, sworn deposition snippet she submitted to this court, she also contradicted her own sworn admissions and further perjured herself by saying she only committed violence against me one single time. Excerpts of Amber

Heard's depositions are attached here as Exhibit A. Ms. Heard also admitted under oath to throwing a can of paint thinner into my head in front of witnesses:

Q: Isn't it true, Ms. Heard, that in front of two different employees at the island you threw the paint thinner and hit him in the head on December 15th?

...

A: Oh, that's true... Exhibit A.

8. There also is an audio recording in which Ms. Heard admits to and apologizes for kicking a door into my head and punching me in the face. After first denying these acts of violence under oath in her deposition, Ms. Heard was forced grudgingly to concede that she did perpetrate the violence against me that she can be heard admitting to only after being confronted with the audio recordings of her confession and apology. Excerpts of Amber Heard's depositions are attached here as Exhibit A.

9. Many people who worked for Ms. Heard and me during our marriage also observed firsthand her violence against me or observed me with injuries that she inflicted upon me immediately after the fact, which in some instances they felt compelled to document by taking photographs of my injuries. Many of them have provided sworn statements attesting to the violence they witnessed Ms. Heard commit against me.

10. Attached here as Exhibit B is a photograph of me with a black eye caused by Ms. Heard punching me in the face on or about April 22, 2016. This photograph was taken by my bodyguard Sean Betts, who is a former 18 year veteran of the LA Sherriff's Department, on April 22, 2016.

11. Attached here as Exhibit C are three photographs of me with scratches on my cheek, chin and nose from an incident that took place on December 15, 2015. These

photographs were taken by Sean Bett at his insistence. Following a pattern she deployed throughout our relationship, Ms. Heard later perversely claimed it was I who committed violence against her on December 15, 2015, splitting her lip, bashing her in the nose so hard it nearly broke, blackening both her eyes and beating her so violently that she claimed I broke the bed in the process. Her account is disputed by multiple witnesses who each provided sworn testimony that they engaged face to face with a makeup-free and clearly uninjured Ms. Heard the following day, December 16, 2016, immediately prior to her appearance on the "James Corden" show, which can also be viewed to see the severe injuries she claims are a lie. These witnesses include Ms. Heard's own stylist Samantha McMillen, who also testified to witnessing Ms. Heard visibly uninjured on other occasions when Ms. Heard claimed I had beaten her.

12. One of Ms. Heard's attacks caused me grave bodily injury. While I was in Australia filming a movie approximately one month after I married Ms. Heard, on a day where my then-lawyer tried to discuss with Ms. Heard the need that she sign a post-nuptial agreement with me, she went berserk and began throwing bottles at me. The first bottle sailed past my head and missed, but then she threw a large glass vodka bottle. The bottle struck the marble countertop where my hand was resting and exploded. The projectile's impact shattered the bone in my finger and entirely severed the tip of my finger. Attached as Exhibit D is a photograph of my finger. I had to have 3 surgeries to reconstruct my finger and contracted MRSA three times. I feared that I would lose my finger, my arm, and my life.

13. To conceal the fact that her domestic violence against me caused me grievous bodily injury, Ms. Heard has concocted various, shifting, false stories claiming that I cut off my own finger. First, in the midst of our divorce case, Ms. Heard caused to be leaked to the media a fake story that I cut off my finger by punching a hole in a wall. Now, Ms. Heard has crafted a

new, but equally fake, story that I cut off my finger by smashing a plastic phone to smithereens while violently beating her in a “three-day ordeal.” Neither of these stories is true. I did not beat Ms. Heard in Australia at any time; nor did I cut off my own finger and shatter the bones. The truth is that Ms. Heard threw a glass vodka bottle at me, and the bottle smashed on the marble countertop where my hand was resting. The impact and the broken glass shattered the bone and cut off the end of my finger. To cover for Ms. Heard, I told the emergency room doctor that it happened in “an accident.” The doctor knew better, and told me: “this is a wound of velocity.”

14. Unfortunately, Ms. Heard’s pattern of violence and abuse extends beyond me. Several women who have been in a relationship with Ms. Heard have come forward to share their personal experiences of brutal violence and other abuse at the hands of Ms. Heard. My advisors have and continue to interview these victims, who remain deeply fearful of Ms. Heard, and to collect evidence from these victims.

15. On May 21, 2016, I went to a penthouse in the Eastern Columbia Building that I owned and shared with Ms. Heard. We had not spoken for a month.

16. Our last interaction had been at my penthouse on April 21, 2016, and involved an enraged Ms. Heard physically attacking me because I was late to her birthday dinner that I threw for her and her friends. My lateness had been due to an important business meeting, of which Ms. Heard was aware. Among other violent acts, Ms. Heard punched me repeatedly in the face as I lay in bed reading after the party, leaving me with an egg shaped swelling under my left eye. A photograph of my injured face following her April 21, 2016 attack is attached as Exhibit B. This photograph was taken by Sean Bett on April 22, 2016 after I returned to my West Hollywood home.

17. After I removed myself from Ms. Heard's presence in the penthouse on April 21, 2016, the following morning Ms. Heard or one of her friends defecated in my bed as some sort of a sick prank before they left for Coachella together. Indeed, our Estate Manager Kevin Murphy told me (and later testified under oath) that Ms. Heard admitted to him that the feces was "just a harmless prank." As a result of the years of domestic abuse I had suffered at the hands of Ms. Heard—most recently the April 21 physical attack and defecation on my bed sometime before she and her friends left the next morning—I resolved to divorce Ms. Heard. I went to pick up my things on May 21, 2016, and also resolved to tell her that I was divorcing her. I arrived at the penthouse in the early evening, and brought my two security guards Jerry Judge and Sean Bett as a precautionary measure, asking them to wait just outside the door of penthouse 3. It appeared that Ms. Heard was alone in the penthouse, although according to witness interviews, she was not. Her friend Raquel Pennington was hiding somewhere in the penthouse, although Ms. Pennington later falsely testified that she was summoned by Ms. Heard by text to Penthouse 3 at 8:06 PM, one of their many concocted lies. After I entered and went upstairs to collect personal belongings, Ms. Heard and I called our then-Estate Manager Kevin Murphy together and I asked Mr. Murphy to repeat to Ms. Heard what he had told me about her admission that the defecation in my bed was "just a harmless prank." Upon hearing Mr. Murphy's recount her admission, she went berserk and started screaming and cursing at Mr. Murphy, prompting Mr. Murphy to ultimately hang up the phone. Before he hung up, I told Ms. Heard that I intended to divorce her. She insisted on calling her friend iO Tillett Wright, who had been living rent-free in my properties for years, to try to explain away the feces that she left in my bed.

18. Ms. Heard put iO Tillett Wright on speakerphone. I had no interest in speaking with Mr. Tillett Wright. Nevertheless, both iO Tillett Wright and Ms. Heard had their chance to

badger me, mock me and deny the defecation incident (of which there were multiple sworn eyewitnesses and photographs) as a figment of my imagination. Hearing enough, I took the phone from Ms. Heard. I said into the phone to iO Tillett Wright: "I don't care, it's over." I flipped the phone onto the sofa, and it landed about 4 feet away from where Ms. Heard was sitting. And indeed, even Ms. Heard admitted this occurred in just this way, testifying "he, you know, like tossed it [the phone] on – in --- tossed it in my direction or something on the table or on the couch." After tossing the phone onto the sofa, I turned around and walked to the other end of the open floor plan room, to the island in the kitchen, approximately 20 feet away from Ms. Heard. Ms. Heard immediately started loudly proclaiming that I had thrown the phone at her and hit her in the face, and screaming "Johnny stop hitting me." I turned to look at Amber trying to understand what was happening. Suddenly, Ms. Pennington comes out of nowhere and runs towards Ms. Heard from behind me and yells: "don't do it, stop it, leave her alone." Because she came from the direction of the front door, and did not come past my security guards outside, she could only have been hiding in the closet, waiting for the signal. Ms. Pennington's ex-husband who was present in penthouse 5 advised that Ms. Pennington lied about being summoned by Ms. Heard at 8:06 by text, because Ms. Pennington was in fact hiding in my penthouse 3 all along. I was shocked and immediately denied this absurd allegation because I had neither thrown the phone at her, nor hit her, nor touched her, nor was I physically anywhere near her. Ms. Heard did not know that my two security guards were posted immediately outside the door of the penthouse. I had asked them to accompany me in case she became violent. At the first sound of her screaming, they rushed inside the penthouse in a second. The two guards surprised Ms. Heard with their entrance, and indeed she appeared shocked. They witnessed her saying "stop

hitting me,” as I stood 20 feet away from her. She then changed her screams and speaking tense to “you better not hit me again!”

19. Although both Ms. Heard and iO Tillett Wright have testified, under penalty of perjury, that Ms. Heard screamed “called 911” and iO Tillett Wright claimed he called 911 instantaneously “to save Amber’s life,” and although Ms. Heard testified under oath that the police arrived just a “few minutes later” after I was seen on surveillance video leaving the building at 8:29 PM, LAPD logs show that 911 was not called until 10:07, 1 hour and 38 minutes after I departed the Eastern Columbia Building. Amber Heard’s and her friend iO Tillett Wright’s sworn 911 call testimony, like the rest of their testimony and hoax, was simply a lie. To further the hoax, iO Tillett Wright even wrote and published a piece in Refinery 29 titled “Why I Called 911.” Mr. Tillett Wright claimed in his article that “when I [he] was on the phone” with Ms. Heard listening to what he claimed was the sounds of violence, he decided to call 911 and “invite the police into the situation ... in a split second.” But LAPD records show this all to be a lie to support the bigger lie. After being confronted by the public on Twitter regarding the gross inconsistencies of his and Ms. Heard’s testimony when held up against the LA Police Department 911 call logs, iO Tillett Wright decided to change his story again and come up with an entirely new story, absurdly posting on May 16, 2019 “I was in nyc when I called 911, which put me through to NYPD. They said they’d have it passed through to LAPD but I worried it wouldn’t be fast enough, so I asked a friend in LA to call anonymously.” In addition to his perjury-explaining, newly concocted, anonymous 911 caller, disproven by the Police Department’s own record that the 911 caller was “Jo Wright” (not as he now was bizarrely claiming, some new, mystery friend) and his and Ms. Heard’s own testimony claiming

the same, Mr. Tillett Wright also tweeted that the inexplicable time gap could somehow vaguely be the fault of the New York Police Department.

20. As Ms. Heard screamed first that I had hit her and then that I better not hit her again, I yelled back that she [Ms. Heard] was crazy, and that I did not touch her, as I had not. My two security guards were both eyewitnesses to this incident, and have testified under oath to it. An excerpt of a deposition given by Ms. Pennington is attached as Exhibit E, in which even she admits that at the time of the incident, I immediately denied hitting Ms. Heard. Ms. Pennington also admits in her deposition that she never saw me hit Ms. Heard. That portion of her deposition is attached as Exhibit E. It is accurate that Ms. Pennington never witnessed what did not happen, but her testimony that she was not present throughout most of Ms. Heard's abuse hoax is a lie, and both other eyewitnesses have so testified that she was present and standing with Ms. Heard by the sofa as soon as Ms. Heard started play-acting abuse. Ms. Heard asserted in her deposition that from the time I left until the "few minutes later" when police arrived, she called and was on the phone with her lawyer. This period was demonstrably not a "few minutes" but in fact nearly 2 hours, according to the surveillance footage of my departure and police logs attached as Exhibits F and G. And a witness who was present in the room after I left described a scene where, guided by Ms. Heard's divorce lawyer on the phone, the co-conspirators got their hoax story straight and were instructed to each "write it down" before 911 was dialed quite some time later.

21. Stunned by the faked abuse allegations, I left penthouse 3 and walked down to my penthouse 5. In penthouse 5, I was shocked to see some sort of bead making, arts and crafts operation littering and strung across the room, along with Raquel Pennington's then-boyfriend Josh Drew, a dog, and a woman I did not know. Based on her later deposition testimony

supporting Ms. Heard's abuse hoax, I later learned that the woman was Ms. Heard's friend Elizabeth Marz, who also lived rent-free in my property. I told Josh Drew and Elizabeth Marz to get off my premises immediately. Then I left the Eastern Columbia Building with my two security guards and returned to my home in West Hollywood. Surveillance footage from the Eastern Columbia Building shows me boarding the penthouse elevator, riding downstairs, and exiting the elevator at 8:29 pm on May 21, 2016.

22. My recollection is that I left Los Angeles, California the following day, May 22 for rehearsals on the east coast. From there I traveled to Europe to tour with my band the Hollywood Vampires, without returning to Los Angeles. I did not return to Los Angeles until late June or early July of 2016.

23. I understand that Ms. Heard claimed under penalty of perjury that her friend, iO Tillett Wright, urgently called 911 in the middle of the hoax fight she absurdly concocted on the evening of May 21, 2016. This 911 call, according to Ms. Pennington's testimony, would have occurred right around 8:06 PM. Both Mr. Wright and Ms. Heard claimed under oath that Mr. Wright was on the phone with Ms. Heard and heard Ms. Heard screaming for someone to call 911 because I was violently attacking her. Ms. Heard claimed under oath that I "wound up my arm like a baseball pitcher" and threw her cell phone into her face as hard as I could from point blank range, "with great aim," and then pulled her hair and further battered her face "with some appendage" of my body. All of these hoax allegations are demonstrably false.

24. Mr. Wright vividly claimed, under penalty of perjury in documents submitted to a court to obtain a temporary restraining order against me, that he called 911 in the middle of this concocted violent fight to "save Amber's life."

25. Ms. Heard and Ms. Pennington also later claimed, in a deposition under the penalty of perjury, that I destroyed two of my own penthouses and the adjoining hallway by picturesquely swinging a magnum-sized bottle of red wine like a baseball bat. Ms. Pennington testified that *“they have a big island in the middle of the kitchen and on there, there’s candles and like fruit and, you know, glass – like jars and vases and things like that. And he just was hitting everything with the wine bottle, just smashing it all off. So there was fruit on the floor, and baskets and, you know, glass bottles and flowers”* See Exhibit E. Ms. Heard similarly testified under oath: “Penthouse 5 was destroyed.” Exhibit A. So that is two destroyed penthouses they testified to. This vivid scenario they described never happened, and the “crime scene” they invented is just one more disprovable lie, in this instance dismantled by the sworn testimony of the two responding police officers. The female and male domestic abuse-trained police officers, who hours later arrived on the scene in response to these co-conspirators’ alleged “emergency call” and did two security sweeps of the penthouses, later testified under oath that they found no damage whatsoever to any of the premises. I understand that Ms. Heard’s publicist, years later, tried to explain away this direct contradiction of Ms. Heard’s and her friends’ story by police by absurdly and falsely claiming to media that my lawyer and I had “paid off” the two dozen sworn eyewitnesses who contradicted her various claims, including the police officers. Ms. Heard tried to weakly explain this inexplicable contradiction in her own deposition to the testimony of the two police officers:

“A: I don’t know what they [the two police officers] – what they saw or didn’t see. I wasn’t ushering them around. They did that by themselves ... but there was extensive damage to which we have plenty of evidence that the officers saw extensive damage.

Q: Is it your testimony here today that the officers saw extensive damage?

A: I don't know what the officers saw." Exhibit A.

26. Ms. Heard and her perjurious, co-conspirator friends whom she invited to live rent-free in my penthouses also testified under oath that Ms. Heard had visible injuries to her face as a result of being struck by a cell phone and further battered by "some appendage" of me on May 21, 2016. Ms. Heard texted her makeup artist later that night, claiming that her face was "swollen" and looked "stupid." Ms. Heard's friend Elizabeth Marz testified under penalty of perjury that on the evening of May 21, 2016 "her eye – just the whole side of her face was like swolled [sic] up and red and puffy and ... it was red and puffy and swollen ... progressively getting worse" which is attached as Exhibit H.

27. I did not violently attack or even touch Ms. Heard, and Ms. Heard's and her friends' poorly fabricated accounts of that night are entirely disproven by the sworn accounts of two domestic abuse-trained police, both of my security guards (one of whom was an 18 year veteran of the Los Angeles Sheriff's Department), and the testimony of a multitude of witnesses whose face to face interactions with Ms. Heard throughout the ensuing week began the following day, May 22, 2016. The accounts of Ms. Heard's and her friends' is also contradicted by 87 surveillance videos that were captured, reviewed and preserved by the management staff of the Eastern Columbia Building.

28. Furthermore, when two LAPD police officers, Officer Melissa Saenz and Officer Tyler Hadden, arrived at 10:24 pm on May 21, 2016 they later testified under oath that Ms. Heard had no injuries to her face following two separate examinations of her face and body. Coupled with their testimony that there was no scene of destruction or indeed any damage whatsoever, both police officers testified under oath that Ms. Heard had no injuries, and they saw no property damage in the penthouse or the hallway. The entirety of their testimony is attached

here as Exhibits I and J. I understand that at 10:24 pm, Ms. Heard texted her makeup artist, Melanie Inglessis, that her face was “swollen” and “looked stupid.”

29. On Monday, May 23, 2016, Ms. Heard filed for divorce from me without making any allegations of domestic violence.

30. On May 25, 2016, Ms. Heard sent me a text message stating, “You and I have the control. And love each other. I thought you filed [for divorce]. You said you were going to and said good-bye. I'm sorry if I've hurt you. I have nothing but love for you.” In the text, Ms. Heard also admitted “[j]ust confirmed that cover letter [sent to your lawyer] is completely private and has nothing to do with any public record. (And only included the domestic violence restraining order stuff because I called the lawyer when the cops were here and I didn't know what to or why -- didn't know what to or why that happened and was scared). The text message is attached here as Exhibit K. Ms. Heard echoed this sentiment to her former friend and neighbor, Isaac Baruch, who testified that Ms. Heard said to him when he confronted her with her abuse hoax soon after she went public with it on May 27: “the lawyers are doing all of this.” Mr. Baruch's declaration is attached here as Exhibit L.

31. When I did not accede to her demand for money, Ms. Heard publicly accused me of domestic violence, seeking and receiving a temporary restraining order against me when appearing in Los Angeles Superior Court on Friday, May 27, 2016 with a first-ever-seen prominent bruise and cut on her face that she claimed resulted from being hit in the face by a cell phone thrown by me and further facial battering from “some appendage” of mine on the evening of May 21, 2016.

32. Again, this domestic violence allegation was untrue, and Ms. Heard's purported injury was staged. In addition to the police officers who observed her on the evening of May 21,

2016, there are over a dozen sworn statements that have been taken from eyewitnesses who interacted with Ms. Heard face to face in the days after May 21, 2016, and testified that she clearly had no injury to her face in the days leading up to going public with her hoax on May 27. Three people who worked in the Eastern Columbia Building have *twice* testified under oath that they had close, daily contact with a makeup-free Ms. Heard, in good light, and she had no visible injuries on her face or otherwise. Their depositions are attached as Exhibits M, N, and O. Brandon Patterson, a fourth building employee and the General Manager of the Eastern Columbia Building whom I do not know personally, stated the same thing under penalty of perjury in a declaration. That declaration is attached here as Exhibit P.

33. The testimony of the Eastern Columbia Building employees is confirmed by surveillance videos that captured images of Ms. Heard's face between May 22, 2016 and May 25, 2016. In each video, Ms. Heard does not have any marks on her face whatsoever. The videos are attached here as Exhibits F. Stills taken from those videos with close up shots of Ms. Heard's face are also attached as Exhibit Q. In one surveillance video, according to sworn testimony from Eastern Columbia Building personnel, Ms. Heard, her sister Whitney Heard, and her co-conspirator Raquel Pennington were captured returning to the building on two separate cameras the night of May 24, 2016. In the first surveillance video, they are laughing, and when Whitney Heard throws a fake punch at Ms. Heard's face, they laugh even harder. They are seen on a different camera continuing to act out the abuse hoax as they enter the elevator. Ms. Heard's face is visibly unharmed, at that point 3 full days after she claimed to have been battered by me. The Eastern Columbia Building employees also testified that they went back and reviewed the surveillance footage after Ms. Heard publicly unveiled her hoax and apparently battered face for the first time on May 27, 2016, as she appeared in court to obtain a temporary

restraining order. The building personnel testified that her injury claims were “false” based on their personal interactions with her between May 22, 2016 and the date she first unveiled her supposedly battered face May 27, 2016.

34. Furthermore, Ms. Heard’s own stylist, Samantha McMillen, has stated in a declaration under penalty of perjury that she interacted with Ms. Heard, face to face, on May 24, 2016, and that she could clearly see that she had no injuries. That declaration is attached as Exhibit R.

35. The first time that Ms. Heard was seen with an injury to her face was May 27, 2016—the day she went to out in public trailed by paparazzi and then to court to obtain the domestic violence restraining order against me. That she was visibly uninjured prior to May 27 was confirmed by the surveillance video footage and the testimony of the multitude of sworn witnesses who testified that they interacted with Ms. Heard throughout the week of May 22, 2016.

36. After I recently began to obtain new, previously hidden evidence to disprove the May 21, 2016 hoax that she presented to the court on May 27 to obtain a temporary restraining order against me, Ms. Heard chose to put further emphasis on other of her abuse claims, hoping that I would not obtain evidence that would dismantle those too. One such claim related to December 15, 2015. On that date, I was at my penthouse and Ms. Heard screamed at me and then violently assaulted me, scratching my cheek, chin and nose. My security guard, a former long time LA Sheriff’s Deputy, whom I called to pick me up the evening of December 15, 2015 insisted on taking photographs of my injuries, which are attached hereto as Exhibit C. There was nothing particularly memorable to me about this incident, given the sheer volume of violent assaults and other abuse I endured from Ms. Heard during our relationship.

37. Consistent with her pattern, Ms. Heard rewrote the story to a false one in which I assaulted her, and split her lip open, nearly broke her nose, blackened both her eyes and hit her so savagely and repeatedly that the bed broke. Unfortunately for Ms. Heard, her December 15 hoax has also been obliterated by two witnesses who have come forward -- her own stylist Samantha McMillen and our former Estate Manager Kevin Murphy - to provide sworn statements of their face to face interactions with a visibly uninjured Ms. Heard the following day, December 16, 2015. Ms. McMillen testified that while styling a makeup-free Ms. Heard the day of December 16, 2015 to prepare her for an appearance that evening on the "James Corden" show, Ms. Heard had no injuries whatsoever to her face. The December 16, 2015 "James Corden" show can be viewed on *Youtube*, and it evidences a visibly uninjured Ms. Heard who bears none of the markings that would exist if Ms. Heard's testimony was true. According to Ms. McMillen's testimony, after the show Ms. Heard said to Ms. McMillen, "can you believe I did that show with two black eyes?" Exhibit R. Ms. McMillen testified that Ms. Heard did not have two black eyes, before the show, during, or immediately after. Exhibit R. Again, Ms. Heard's hoax-assisting friend iO Tillett Wright jumped in to support the lie, writing in his piece in *Refinery 29* that he was with Ms. Heard the following day and witnessed her injuries. But iO Tillett Wright was not in LA on December 15, 2016 according to witnesses, because he was in Ohio filming a show. When confronted on May 16, 2019 by the public on social media about his published, *Refinery 29* lie of Ms. Heard's injuries that he "witnessed" held up against his social media post "geotags" showing he was in Ohio at the time, iO Tillett Wright admitted in a Twitter post that his "geotags" showed him to be out of LA, and confessed that he was "guilty of changing my geotags for sure." Nevertheless, he bewilderingly added he flew back "early" to attend to and witness Ms. Heard and further wrote: "I can change my geotags anytime and

anywhere and it has nothing to do with a case. I wouldn't be so naïve as to think that a lawyer or cop would ever use Instagram geotags because as soon as a judge found out you can change them it would get thrown out.”

38. On December 16, 2015, Ms. Heard also summoned our then-Estate Manager Mr. Murphy to my penthouse to complain about the fact that I had beaten her up the night before. Mr. Murphy testified that Ms. Heard's face was utterly uninjured and unmarked, and appeared makeup free, as they spoke face to face and in good light the day after she alleged the brutal attack. Mr. Murphy also testified that Ms. Heard called him back up to the penthouse bedroom specifically to show him a clump of blonde hair on the ground purporting to be hair I had pulled out of her head. Because of Ms. Heard's demeanor and the fact that she showed Mr. Murphy a clump of hair on the floor but not the place that hair was pulled from, Mr. Murphy grew suspicious and took a time- and date-stamped cell phone photograph of the hair clump, and later compared it to the hair clump Ms. Heard submitted to the court under oath. The hair clumps do not resemble each other, as Mr. Murphy testified in his declaration. Mr. Murphy, like other eyewitnesses, also testified to the very real violence Ms. Heard committed against me, that left real injuries.

39. Cynically relying on the concept of #believewomen that that has been promoted as part of the important #metoo movement, Ms. Heard's "evidence" rests primarily on her word and that of her dependent friends. She and they have falsely accused me of violence, although interestingly none of her "witnesses" say they ever witnessed any violence. And they did this despite the inconvenient truth of my possession of eyewitness statements provided under penalty of perjury and photographs of her converse violence committed against me, overwhelming evidence that her various abuse claims and the injuries that she claimed ensued from them are

hoaxes, the fact of her own prior arrest and incarceration for domestic violence against her previous wife, and new witnesses who are now coming forward to describe the brutal violence they suffered at her hands. She also lied about the circumstances of her domestic violence arrest, and the supposedly homophobic motivations of the arresting officer (a self-described lesbian gay rights activist) under oath. Exhibit A.

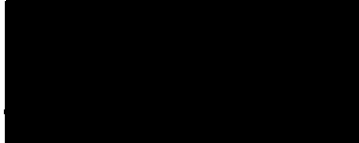
40. Indeed, lying under oath, and to courts and government agencies, and suborning or attempting to suborn the perjury of her friends and employees to help her get what she wants or to protect her from criminal prosecution, is demonstrably Ms. Heard's *modus operandi*. We recently obtained evidence showing Ms. Heard scheming in an email discussion with her lawyer Marty Singer (also, oddly, my lawyer in my divorce from Ms. Heard) to suborn the perjury of her former assistant Kate James to wiggle out of her criminal dog smuggling case. "*You have to be careful that she [Ms. James] will cooperate and will not go public, if you ask her not to be truthful*" grotesquely advised Mr. Singer in writing. Ms. Heard responded in the same email chain to Mr. Singer, copying Mr. Murphy, on the topic of seeking Kate James' "untruthful" testimony: "*Marty – I'm waiting to hear back from you before I reach out to Kevin to liaise with Kate. AH*". A follow up email was sent by Ms. Heard to Mr. Murphy, copying her lawyer Marty Singer, saying: "*Kevin, what do you think???* *Could you possibly reach out to her for us?? Do you think you could get her to do it?*" "It" was Ms. Heard's hoped-for commission of perjury to submit to the Australian court. Mr. Murphy explained this email under oath, testifying that Ms. Heard asked him to suborn perjury from Ms. Heard's former assistant Kate James on Ms. Heard's behalf, and even attempted to bully Mr. Murphy into lying himself on her behalf by threatening his job after Mr. Murphy refused to lie, saying to him: "Well I want your help on this I wouldn't want you to have a problem with your job." Exhibit A to Kevin Murphy's

Declaration. Ms. Heard's attempts to suborn perjury to trick the Australian court are confirmed by the email attached to Mr. Murphy's declaration. In another illustrative incident showing Ms. Heard's relationship with the truth and willingness to defraud the government or anyone else to get what she wants, Ms. Heard sent a signed letter dated September 28, 2014 to the Department of Homeland Security, falsely claiming that her assistant Samantha McMillen, a citizen of the United Kingdom, was merely her "friend" traveling to the US on a tourist visa. Attached as Exhibit S is Ms. Heard's signed letter which says among other things: "*My name is Amber Heard I am a proud American citizen. I am writing this letter in response to a fraudulent report made against my English friend, Savannah McMillen . It has come to my awareness that while spending time visiting me in the United States someone made a false claim against her stating, without any proof or corroboration, that she was unlawfully working for me. As her friend, I can say truthfully and unequivocally that this allegation is entirely false. . . I would like to go on record saying that Savannah McMillen is a personal friend, and to my knowledge, has never worked unlawfully or otherwise in the United States Or for me. I regret that the precious time of our immigration agencies has been bastardized on such a petty personal matter made out of malice, not truth. . . I expect the same standards that we hold as pillars in our great justice system, be allied to immigration policies, as they serve at the forefront in representing United States and her values*" In fact, the story that Savannah was merely her "friend" was a lie Ms. Heard, an "immigration activist," fraudulently wrote to Homeland Security to get what she wanted; Ms. Heard's assistant Savannah McMillen was illegally working in America, for Ms. Heard, as a simple Google search or paycheck in my possession would reveal. Lies, deception, and perjury are useful tools to Ms. Heard and her ilk – to obtain money, to accuse me of violent abuse and obtain a false temporary restraining order, to avoid criminal prosecution, to receive

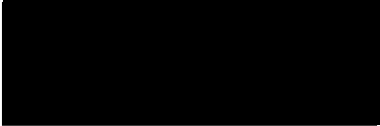
philanthropic invitations and accolades, to obtain illegal immigration rights for her assistant, to achieve and maintain fame, and to explain away evidence of her actions to the media for which there is no lawful or reasonable explanation.

Executed this ____ day of May, 2019 in Los Angeles, California

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

A large black rectangular redaction box covering the signature area.

~~John Christopher Depp, III~~

A large black rectangular redaction box covering the signature area.

ATTACHMENT 7

2. Plaintiff objects to each and every Request to the extent that the Requests (including the “Definitions” and “Instructions” identified in the Requests) (a) are overly broad or unduly burdensome; (b) are vague, ambiguous, duplicative, cumulative, or do not identify with reasonable particularity the information sought; (c) call for information that is neither relevant nor reasonably calculated to lead to the discovery of admissible evidence; (d) seek to impose obligations on Plaintiff beyond or inconsistent with those required by Virginia law and the rules of this Court (“Rules”); or (e) purport to seek documents or information not in Plaintiff’s actual possession, custody, or control; any statement herein that Plaintiff will produce documents responsive to a specific Request means that Plaintiff will produce documents located through a reasonable search for documents in its possession, custody, and control.

3. Plaintiff objects to the extent that the discovery sought by the Requests is obtainable from some other source that is more convenient, less burdensome, or less expensive.

4. Plaintiff objects to the extent the discovery sought is unduly burdensome or expensive, taking into account the needs of the case, the amount in controversy, limitations on the parties’ resources, and the importance of the issues at stake in the litigation.

5. Plaintiff objects to each and every Request, Definition, and Instruction to the extent that they purport to require production of documents at a specified time or place, or in a specified manner. Plaintiff will make documents available in accordance with Rule 4:9 and any agreement among the parties or orders of the Court governing the conduct of discovery.

6. Plaintiff objects to the Requests to the extent that they seek documents or information protected by the attorney-client privilege, the work product doctrine, or any other applicable privilege, protection, exemption or immunity. Plaintiff will produce only non-privileged information. Inadvertent disclosure of any privileged or otherwise protected

documents or information shall not constitute a waiver of any claim of privilege, protection, exemption or immunity. Plaintiff reserves the right to redact documents produced in response to the Requests.

7. Plaintiff objects to the Requests, including the Definitions and Instructions contained therein, to the extent they seek documents or information protected from disclosure as being a trade secret or other confidential business or proprietary information, or documents or information that, if produced or disclosed, would result in the violation of any contractual obligation to third parties, or any applicable right to privacy of Plaintiff or third parties.

8. Plaintiff objects to any Request seeking “all” documents on the grounds that Plaintiff cannot guarantee that he has located every single document responsive to a particular Request. Subject to the general objections and any qualifications below, Plaintiff will respond to any Request seeking “all” documents by producing the responsive, non-privileged documents within its possession, custody, and control that can be located after a reasonable search conducted in good faith.

9. Plaintiff reserves the right to produce documents responsive to the Requests on a rolling basis at a time, place, and manner to be agreed on by the parties.

10. Plaintiff objects to the Requests, including the Definitions and Instructions contained therein, to the extent that they are redundant or duplicative of other specific Requests. Where information or a document may be responsive to more than one Request, Plaintiff will provide that information or produce that document only once.

11. Plaintiff objects to the Requests to the extent that they purport to require the identification and/or restoration of any deleted, legacy, backup, or archival data, or otherwise

seek the production of any document that is not accessible without undue burden or unreasonable expense.

12. Plaintiff objects to each of the Requests to the extent that the Requests or related Instructions purport to impose any discovery obligations on Plaintiff beyond those already imposed by applicable law.

13. Plaintiff's responses to the Requests are not intended to be, nor shall be deemed, an admission of matters stated, implied, or assumed by any or all of the Requests. In responding to the Requests, Plaintiff neither waives nor intends to waive, but expressly reserves, any and all objections as to the authenticity, relevance, competency, materiality, or admissibility at trial or during any proceeding of any information or documents produced, set forth, or referred to herein.

14. Any response by Plaintiff stating that it will produce documents is not intended as a representation that such documents exist within any requested category or categories but solely as an assertion that Plaintiff will produce (consistent with these Responses and Objections) any non-privileged, responsive documents or information within its actual possession, custody, or control that can be located after a reasonable search conducted in good faith.

15. Plaintiff objects to any factual assumptions, implications, and explicit or implicit characterizations of facts, events, circumstances, or issues in the Requests. Plaintiff's responses herein are not intended to mean that Plaintiff agrees with any factual assumptions, implications, or any explicit or implicit characterization of facts, events, circumstances, or issues in the Requests, and are without prejudice to Plaintiff's right to dispute facts and legal conclusions assumed in the Requests.

16. These objections and responses are based on Plaintiff's present knowledge, information, and belief, and therefore remain subject to change or modification based on further

discovery of facts or circumstances that may come to Plaintiff's attention. Plaintiff reserves the right to rely on any facts, documents, evidence, or other contentions that may develop or come to its attention at a later time and to supplement or amend the responses at any time prior to the trial. Plaintiff further reserves the right to raise any additional objections deemed necessary or appropriate in light of any further review.

OBJECTIONS TO INSTRUCTIONS AND DEFINITIONS

Instructions

1. In accordance with the Rules of this Court, You shall answer the following Requests separately and fully, in writing.

RESPONSE: No objection.

2. Where information in Your possession is requested, such request includes nonprivileged information in the possession of Your agent(s), employee(s), assign(s), representative(s), and all others acting on Your behalf.

RESPONSE: Plaintiff objects to this instruction as overly broad and unduly burdensome, to the extent that it requires production of documents from individuals not under Plaintiff's control. Plaintiff will produce documents from a limited number of custodians to be negotiated with Defendant in good faith.

3. Whenever appropriate in these Requests, the singular form of a word shall be interpreted as its plural to whatever extent is necessary to bring within the scope of these Requests any information which might otherwise be construed to be outside their scope.

RESPONSE: No objection.

4. Unless otherwise indicated, these Requests refer to the time, place, and circumstances of the occurrences mentioned or complained of in the pleadings in this case.

RESPONSE: Plaintiff objects to this instruction as overly broad and unduly burdensome, to the extent that it requires production of documents not within the possession, custody or control of Plaintiff. Plaintiff will produce documents from

a relevant time period to be negotiated with Defendant in good faith. Plaintiff further objects to this instruction as vague and ambiguous.

5. All references to an entity include the entity and its agents, officers, employees, representatives, subsidiaries, divisions, successors, predecessors, assigns, parents, affiliates, and unless privileged, its attorneys and accountants.

RESPONSE: Plaintiff objects to this instruction as overly broad and unduly burdensome, to the extent that it requires production of documents from individuals and entities other than Plaintiff and/or documents that are not within Plaintiff's custody and control.

6. If You perceive any ambiguities in a question, instruction, definition, or other aspect of these discovery requests, set forth the matter deemed ambiguous and the construction used in answering.

RESPONSE: No objection.

7. If You assert a claim of privilege as to any of Your responses to the Requests, state the basis for the asserted privilege, specify the privilege claimed, and include in Your answer sufficient information to permit the Court to make an informed ruling on the claim of privilege. If the claim relates to a privileged document, state the date, person or persons who prepared or participated in preparing the document, the name and address of any person to whom the document was shown or sent, the general subject matter of the document, the present or last known location and custodian of the original of the document, and the basis for the claim of privilege with respect to the document. If the claim of privilege relates to a communication, state the date(s), place(s) and person(s) involved in the communication, the subject matter of the communication, and the basis for the claim of privilege with respect to that communication. Reliance on any claim of privilege is subject to the Rules of this Court, including the production of a privilege log.

RESPONSE: Plaintiff objects to this instruction as overly broad and unduly burdensome, to the extent that it requires Plaintiff to produce a privilege log in a specific manner at a specific time. Plaintiff will produce a privilege log at a time and in a manner to be negotiated with Defendant in good faith.

8. If You perceive any Request to be overly broad, unduly burdensome, or objectionable for any other reason, respond to the fullest extent possible and clearly note any objection so that the Court will be permitted to make an informed ruling on the objection.

RESPONSE: No objection.

9. These Requests are continuing in character so as to require You to promptly amend or supplement Your responses in accordance with the Rules of the Supreme Court of Virginia within a reasonable time if You obtain or become aware of any further information responsive to these Requests. Ms. Heard reserves the right to propound additional Requests.

RESPONSE: No objection.

10. Unless otherwise indicated, these requests include the time from when the parties met, in 2008.

RESPONSE: Plaintiff objects to this instruction as overly broad, unduly burdensome, and harassing to the extent that it purports to require Plaintiff to produce documents from a twelve-year timeframe that encompasses documents that are not relevant to the subject matter of this action.

Definitions

a. ***Action.*** The term “Action” means the above-captioned action.

RESPONSE: No objection.

b. ***Communication.*** The term “communication” means any oral or written exchange of words, thoughts, or ideas to another person, whether person-to-person, in a group, by phone, text (SMS), letter, fax, e-mail, internet post or correspondence, social networking post or correspondence or by any other process, electric, electronic, or otherwise. All such

Communications are included without regard to the storage or transmission medium (electronically stored information and hard copies are included within this definition).

RESPONSE: No objection.

c. ***Document.*** The term “document” is defined in its broadest terms currently recognized. The term shall include, without limitations: any written or other compilation of information (whether printed, handwritten, recorded, or encoded, produced, reproduced, or reproducible by any other process), drafts (revisions or finals), original or preliminary notes, and summaries of other documents, communications of any type (e-mail, text messages, blog posts, social media posts or other similar communications or correspondence), computer tape, computer files, and including all of their contents and attached files. The term “document” shall also include but not be limited to: correspondence, memoranda, contractual documents, specifications, drawings, photographs, images, aperture cards, notices of revisions, test reports, inspection reports, evaluations, technical reports, schedules, agreements, reports, studies, analyses, projections, forecasts, summaries, records of conversations or interviews, minutes or records of conferences or meetings, manuals, handbooks, brochures, pamphlets, advertisements, circulars, press releases, financial statements, calendars, diaries, trip reports, etc. A draft of a non-identical copy is a separate document within the meaning of this term.

RESPONSE: Plaintiff objects to this definition as overly broad and unduly burdensome, and to the extent that it seeks to impose burdens beyond what are required by the Rules.

d. ***Correspondence.*** The term “correspondence” means any document(s) and/or communication(s) sent to or received from another entity and/or person.

RESPONSE: Plaintiff objects to this definition as overly broad and unduly burdensome, to the extent that it is duplicative of the terms Document and Communication, and to the extent that it seeks to impose burdens beyond what are required by the Rules.

e. **Person.** The term “person” is defined as any natural person, business, company, partnership, legal entity, governmental entity, and/or association.

RESPONSE: No objection.

f. **Concerning.** The term “concerning” includes relating to, referring to, describing, evidencing, or constituting.

RESPONSE: No objection.

g. **Including.** The term “including” means including but not limited to.

RESPONSE: No objection.

h. **And/or.** The use of “and/or” shall be interpreted in every instance both conjunctively and disjunctively in order to bring within the scope of these discovery requests any information which might otherwise be construed to be outside their scope.

RESPONSE: No objection.

i. **Defendant and/or Ms. Heard.** The terms “Defendant” and/or “Ms. Heard” refer to Defendant Amber Laura Heard, including her agents, representatives, employees, assigns, and unless privileged, all persons acting on her behalf.

RESPONSE: Plaintiff objects to this definition as overly broad and unduly burdensome, to the extent that it is inclusive of “agents, representatives, employees, assigns, and unless privileged, all persons acting on her behalf.”

j. **Plaintiff and/or Mr. Depp.** The terms “Plaintiff” and/or “Mr. Depp” refer to Plaintiff John C. Depp, II, including his agents, representatives, employees, assigns, and all persons acting on his behalf.

RESPONSE: Plaintiff objects to this definition as overly broad and unduly burdensome, to the extent that it is inclusive of “agents, representatives, employees, assigns, and all persons acting on his behalf.” Plaintiff will interpret this term to exclude all privileged communications and documents.

k. ***Complaint.*** The term “Complaint” shall mean the Complaint filed by Plaintiff in this Action.

RESPONSE: No objection.

l. ***Romantic Partners.*** The term “Romantic Partners” shall mean any persons You have touched in a sexual manner in the past ten (10) years, meaning: (a) direct contact between any part of Your body and another person’s genitalia, anus, groin, breast, inner thigh, or buttocks; or (b) direct contact between any part of a third party’s body and Your genitalia, anus, groin, breast, inner thigh, or buttocks.

RESPONSE:

m. ***You and/or Your.*** The terms “You” and/or “Your” refer to the recipient(s) of these discovery requests, as well as all persons and entities over which said recipient has “control” as understood by the Rules of this Court.

RESPONSE: No objection.

REQUESTS

1. Documents sufficient to reflect the full amount of earnings, including income, royalties, brand income, and other sources of income, of Mr. Depp, during the marriage between Mr. Depp and Ms. Heard.

RESPONSE:

Plaintiff repeats and incorporates by this reference the above-stated General Objections and Objections to Definitions and Instructions as though set forth in full. Plaintiff further objects to this Request on the grounds that it seeks documents that are neither relevant nor reasonably calculated to lead to the discovery of admissible evidence, because, among other reasons, the totality of Plaintiff’s financial condition is not at issue in this action. Plaintiff further objects to this Request on the grounds that it is facially overly broad, unduly burdensome, and harassing, because it purports to seek a vast array of information regarding Plaintiff’s finances without

regard to whether or not such information relates to the subject matter of this action, which information is private and protected from disclosure. Plaintiff further objects to this Request to the extent that it could be construed to seek documents protected by the attorney-client privilege, the work-product doctrine, and any other applicable privilege, immunity, or protection. Plaintiff further objects to this Request on the grounds that it seeks confidential, proprietary, and private personal and/or business information of Plaintiff, which is not subject to discovery in this action, including protected financial information. Plaintiff further objects to this Request on the grounds that it is duplicative of other discovery and is unreasonably cumulative. Plaintiff further objects to this Request on the grounds that to the extent it is intended to obtain information pertaining to Plaintiff's damages, such information is obtainable by less burdensome and intrusive means, without making a blanket request for "all sources" of Plaintiff's income. Plaintiff further objects to this Request on the grounds that because of its unlimited and unreasonable scope, and because it bears no reasonable relation to the issues in this action, it appears calculated to harass and represents a misuse of the discovery process.

Accordingly, Plaintiff will not produce documents in response to this Request.

2. Documents sufficient to reflect the taxes paid on the income and earnings set forth in No. 1 above.

RESPONSE:

Plaintiff repeats and incorporates by this reference the General Objections and Objections to Definitions and Instructions above, as though set forth in full. Plaintiff further objects to this Request on the grounds that it is neither relevant nor reasonably calculated to lead to the discovery of admissible evidence, because Plaintiff's payment of taxes is not at issue in this action. Plaintiff further objects to this Request on the grounds that it is facially overbroad, unduly burdensome, and harassing, because it seeks confidential financial information that is not

properly at issue. Plaintiff further objects to this Request on the grounds that it constitutes an improper invasion of privacy by seeking disclosure of personal financial information of Plaintiff, since because “a party's income tax return contains confidential and personal information, inspection or disclosure of it should only be permitted for good cause.” *See, Sanford v. Sanford*, 450 SE 2d 185 (1994). Plaintiff further objects to this request on the grounds that it is disproportionate to the needs of the case, as the totality of Plaintiff’s financial condition is not at issue in this action and is not a proper avenue of discovery. Plaintiff further objects to this Request on the grounds that to the extent it is intended to obtain information pertaining to Plaintiff’s damages, such information is obtainable by less burdensome and intrusive means. Plaintiff further objects to this Request on the grounds that because of its unlimited and unreasonable scope, and because it bears no reasonable relation to the issues in this action, it appears calculated to harass and represents a misuse of the discovery process.

Accordingly, Plaintiff will not produce documents in response to this Request.

3. Documents sufficient to reflect all liabilities, other than taxes, incurred by Mr. Depp during the marriage between Mr. Depp and Ms. Heard.

RESPONSE:

Plaintiff repeats and incorporates by this reference the above-stated General Objections and Objections to Definitions and Instructions as though set forth in full. Plaintiff further objects to this Request on the grounds that it seeks documents that are neither relevant nor reasonably calculated to lead to the discovery of admissible evidence, because, among other reasons, the totality of Plaintiff’s financial condition and liabilities is not at issue in this action. Plaintiff further objects to this Request on the grounds that it is facially overly broad, unduly burdensome, and harassing, because it purports to seek a vast array of information regarding Plaintiff’s finances and liabilities without regard to whether or not such information relates to the subject

matter of this action, which information is private and protected from disclosure. Plaintiff further objects to this Request to the extent that it could be construed to seek documents protected by the attorney-client privilege, the work-product doctrine, and any other applicable privilege, immunity, or protection. Plaintiff further objects to this Request on the grounds that it seeks confidential, proprietary, and private personal and/or business information of Plaintiff, which is not subject to discovery in this action, including protected financial information. Plaintiff further objects to this Request on the grounds that it is duplicative of other discovery and is unreasonably cumulative. Plaintiff further objects to this Request on the grounds that because of its unlimited and unreasonable scope, and because it bears no reasonable relation to the issues in this action, it appears calculated to harass and represents a misuse of the discovery process.

Accordingly, Plaintiff will not produce documents in response to this Request.

4. Documents sufficient to reflect all actual liabilities that Ms. Heard would have been subject to, but was released from as part of the divorce settlement.

RESPONSE:

Plaintiff repeats and incorporates by this reference the above-stated General Objections and Objections to Definitions and Instructions as though set forth in full. Plaintiff further objects to this Request on the grounds that it seeks documents that are neither relevant nor reasonably calculated to lead to the discovery of admissible evidence. Plaintiff further objects to this Request on the grounds that it is overly broad, unduly burdensome, and harassing. Plaintiff further objects to this Request on the grounds that it could be construed to seek documents protected by the attorney-client privilege, the work-product doctrine. Responding Party objects to this Request to the extent that it could be construed to seek documents protected by any other applicable privilege, immunity, or protection. Plaintiff further objects to this Request on the

grounds that it seeks confidential, proprietary, and private personal and/or business information of Plaintiff, which is not subject to discovery in this action, including protected financial information. Plaintiff further objects to this Request on the grounds that it is vague and ambiguous and calls for a legal conclusion. Plaintiff further objects to this Request on the grounds that it seeks information that is equally available to and/or already in the possession of Defendant and/or her past or present attorneys; Plaintiff is under no obligation to undertake an after-the-fact legal analysis of the parties' settlement following their divorce.

Accordingly, Plaintiff will not produce documents in response to this Request.

5. A copy of Ms. Heard's Preliminary/Final Declaration of Disclosure served on Mr. Depp on or around October 21, 2016.

RESPONSE:

Plaintiff repeats and incorporates by this reference the above-stated General Objections and Objections to Definitions and Instructions as though set forth in full. Plaintiff further objects to this Request on the grounds that it seeks documents that are neither relevant nor reasonably calculated to lead to the discovery of admissible evidence. Plaintiff further objects to this Request on the grounds that it is overly broad, unduly burdensome, and harassing. Responding Party objects to this Request to the extent that it could be construed to seek documents protected by the attorney-client privilege, work-product doctrine, or any other applicable privilege, immunity, or protection. Plaintiff further objects to this Request on the grounds that it is vague and ambiguous. Plaintiff further objects to this Request on the grounds that it seeks documents prepared by, and presumably maintained by, Defendant and/or her attorneys, and is equally available to or already in possession of Defendant, and represents an improper attempt to shift the burden of producing such document to Plaintiff.

Accordingly, Plaintiff will not produce documents in response to this Request.

6. A copy of Mr. Depp's Preliminary/Final Declaration of Disclosure served on Ms. Heard on or about September 13, 2016.

RESPONSE:

Plaintiff repeats and incorporates by this reference the above-stated General Objections and Objections to Definitions and Instructions as though set forth in full. Plaintiff further objects to this Request on the grounds that it seeks documents that are neither relevant nor reasonably calculated to lead to the discovery of admissible evidence. Plaintiff further objects to this Request on the grounds that it is overly broad, unduly burdensome, and harassing. Responding Party objects to this Request to the extent that it could be construed to seek documents protected by the attorney-client privilege, work-product doctrine, or any other applicable privilege, immunity, or protection. Plaintiff further objects to this Request on the grounds that it is vague and ambiguous. Plaintiff further objects to this Request on the grounds that it seeks documents already in possession of Defendant and/or her attorneys, and is equally available to or already in possession of Defendant, and represents an improper attempt to shift the burden of producing such document to Plaintiff, because, among other reasons, the Request explicitly concedes that such document was already served on Defendant.

Accordingly, Plaintiff will not produce documents in response to this Request.

7. All documents reflecting all efforts to preserve all the video footage for the ECB during the period May 21, 2016 – May 28, 2016.

RESPONSE:

Plaintiff repeats and incorporates by this reference the above-stated General Objections and Objections to Definitions and Instructions as though set forth in full. Plaintiff further objects to this Request on the grounds that it seeks documents that are neither relevant nor reasonably calculated to lead to the discovery of admissible evidence. Plaintiff further objects to this Request on the grounds that it is overly broad, unduly burdensome, and harassing. Responding

Party objects to this Request on the grounds and to the extent that it seeks documents protected by the attorney-client privilege and work-product doctrine. Responding Party objects to this Request to the extent that it seeks documents protected by any other applicable privilege, immunity, or protection. Plaintiff further objects to this Request on the grounds that it is vague and ambiguous, including as to the undefined term “ECB.”

Accordingly, Plaintiff will not produce documents in response to this Request.

8. All documents reflecting all communications between Mr. Depp’s divorce attorneys and any third parties, including interviews, telephone calls, statements prepared, press briefings, or any other communications, during the period May 21, 2016 through January 17, 2017.

RESPONSE:

Plaintiff repeats and incorporates by this reference the General Objections and Objections to Definitions and Instructions above, as though set forth in full. Plaintiff further objects to this Request on the grounds that it improperly seeks to require Plaintiff to produce documents and communications that were neither generated nor maintained by Plaintiff, but rather by Plaintiff’s attorneys. Plaintiff further objects to this request on the grounds and to the extent that it seeks documents that are not within Plaintiff’s possession, custody, or control. Plaintiff further objects to this Request on the grounds that it seeks documents protected by the attorney-client privilege. Plaintiff further objects to this Request on the grounds that it seeks documents protected by the work-product doctrine, including and especially as it seeks documents that reflect the strategy, analysis, and mental impressions of counsel for Plaintiff. Plaintiff further objects to this Request on the grounds that it seeks documents that are neither relevant nor reasonably calculated to lead to the discovery of admissible evidence, and is overly broad, unduly burdensome, and harassing, because, among other reasons, it seeks documents and communications “reflecting all communications” without any limitation whatsoever as to subject matter, and without tailoring

the scope of the request to the subject matter of this action, i.e., the relationship between Plaintiff and Defendant. Plaintiff further objects to this Request to the extent that it constitutes an invasion of privacy.

Accordingly, Plaintiff will not produce documents in response to this Request.

9. Documents sufficient to reflect the full amount of money and all other remuneration, gifts or benefits paid to Melissa Saenz, Stephen Deuters, Edward White, Trinity Esparza, Cornelius Harrell, Malcolm Connolly, Tara Roberts, Samantha McMillan, Nathan Holmes, Hilda Vargas, Ben King, Kevin Murphy, Winona Ryder, Kate James, Sean Bett, Vanessa Paradis, Laura Divenere, Alejandro Romero, Isaac Baruch, Travis McGivern, and Brandon Patterson, from the period 2010 through the present.

RESPONSE:

Plaintiff repeats and incorporates by this reference the General Objections and Objections to Definitions and Instructions above, as though set forth in full. Plaintiff further objects to this request on the grounds and to the extent that it seeks documents that are not within Plaintiff's possession, custody, or control. Plaintiff further objects to this Request on the grounds and to the extent that it could be construed to seek documents protected by the attorney-client privilege, work-product doctrine, or any other applicable privilege or immunity. Plaintiff further objects to this Request on the grounds that it seeks documents that are neither relevant nor reasonably calculated to lead to the discovery of admissible evidence, and instead represents a facially improper blanket request for the financial information of 21 disparate persons, without any attempt to tailor the scope of the Request to the issues in this action. Responding Party further objects to this Request on the grounds that it seeks private and personal financial and other information of Plaintiff and numerous third persons, which is not at issue in this action. Responding Party further objects to this Request on the grounds that it is overly broad, unduly burdensome, and harassing. Plaintiff further objects to this Request on the grounds that it constitutes an invasion of privacy. Plaintiff further objects to this Request on the grounds that in

its patent overbreadth and intrusiveness it suggests an intention to harass Plaintiff and the third parties named therein.

Accordingly, Plaintiff will not produce documents in response to this Request.

10. All communications of any nature, including any attachments, drafts, Declarations, texts, emails and other methods of communications by Mr. Depp, or any agent or representative on his behalf, including attorneys, and Melissa Saenz, Stephen Deuters, Edward White, Trinity Esparza, Cornelius Harrell, Malcolm Connolly, Tara Roberts, Samantha McMillan, Nathan Holmes, Hilda Vargas, Ben King, Kevin Murphy, Winona Ryder, Kate James, Sean Bett, Vanessa Paradis, Laura Divenere, Alejandro Romero, Isaac Baruch, Travis McGivern, and Brandon Patterson, from the period 2010 through the present.

RESPONSE:

Plaintiff repeats and incorporates by this reference the General Objections and Objections to Definitions and Instructions above, as though set forth in full. Plaintiff further objects to this request on the grounds and to the extent that it seeks documents that are not within Plaintiff's possession, custody, or control. Plaintiff further objects to this Request on the grounds that it seeks documents protected by the attorney-client privilege. Plaintiff further objects to this Request on the grounds that it seeks documents protected by the work-product doctrine. Plaintiff further objects to this Request on the grounds that it seeks documents protected by or any other applicable privilege or immunity. Plaintiff further objects to this Request on the grounds that it seeks documents that are neither relevant nor reasonably calculated to lead to the discovery of admissible evidence, and instead represents a facially improper blanket request for "all communications of any nature," without any attempt to tailor the scope of the Request to the issues in this action or limit the Request as to subject matter. Responding Party further objects to this Request on the grounds that it seeks private and personal financial and other information of Plaintiff and numerous third persons, which is not at issue in this action. Responding Party further objects to this Request on the grounds that it is facially overly broad, unduly burdensome, and harassing. Plaintiff further objects to this Request on the grounds that it constitutes an

invasion of privacy. Plaintiff further objects to this Request on the grounds that in its patent overbreadth and intrusiveness it suggests an intention to harass Plaintiff and the third parties named therein, and represents a misuse of the discovery process.

Accordingly, Plaintiff will not produce documents in response to this Request.

11. All photographs, videotapes, audio recordings, blue prints, invoices, and descriptions and /or details of damages, of the property Mr. Depp stayed at while in Australia during the months of February and March 2015.

RESPONSE:

Plaintiff repeats and incorporates by this reference the General Objections and Objections to Definitions and Instructions above, as though set forth in full. Responding Party further objects to this Request to the extent that it could be construed to seek documents protected by the attorney-client privilege, work-product doctrine, or any other applicable privilege or immunity. Responding Party further objects that the Request is overbroad, burdensome, and harassing, and seeks documents that are neither relevant nor reasonably calculated to lead to the discovery of admissible evidence. Responding Party further objects that this Request seeks documents protected by the privacy rights of Plaintiff and third parties.

Subject to, and without waiver of the above-stated objections, Responding Party will produce non-privileged documents responsive to this Request on a rolling basis on a timeline mutually agreeable to the parties.

12. All receipts for expenses incurred while at the Australia property referred to in Nov. 11 above.

RESPONSE:

Plaintiff repeats and incorporates by this reference the General Objections and Objections to Definitions and Instructions above, as though set forth in full. Responding Party further objects to this Request on the grounds that it seeks documents that are neither relevant nor

reasonably calculated to lead to the discovery of admissible evidence. Responding Party further objects to this Request on the grounds that it is overbroad, burdensome, and harassing, because it represents a blanket request for all expenses incurred by Plaintiff, without any limitation as to subject matter. Responding Party further objects to this Request on the grounds that it seeks documents protected by the attorney-client privilege, work-product doctrine, and any other applicable privilege, immunity, or protection. Responding Party further objects to this Request on the grounds that it constitutes an invasion of privacy.

Accordingly, Responding Party will not produce documents in response to this Request.

13. All photographs, videotapes, audio recordings, blue prints, invoices, and descriptions and /or details of damages, of the property Mr. Depp stayed at while in Hicksville.

RESPONSE:

Plaintiff repeats and incorporates by this reference the General Objections and Objections to Definitions and Instructions above, as though set forth in full. Responding Party further objects to this Request to the extent that it could be construed to seek documents protected by the attorney-client privilege, work-product doctrine, or any other applicable privilege or immunity. Responding Party further objects that the Request is overbroad, burdensome, and harassing, and seeks documents that are neither relevant nor reasonably calculated to lead to the discovery of admissible evidence. Responding Party further objects that this Request seeks documents protected by the privacy rights of Plaintiff and third parties. Responding Party further objects that the Request is vague and ambiguous, including as to time.

Subject to, and without waiver of the above-stated objections, Responding Party will produce non-privileged documents responsive to this Request on a rolling basis on a timeline mutually agreeable to the parties.

14. All photographs, videotapes, audio recordings, blue prints, invoices, and descriptions and/or details of damages, of the property owned by Mr. Depp in the Bahamas.

RESPONSE:

Plaintiff repeats and incorporates by this reference the General Objections and Objections to Definitions and Instructions above, as though set forth in full. Responding Party further objects to this Request to the extent that it could be construed to seek documents protected by the attorney-client privilege, work-product doctrine, or any other applicable privilege or immunity. Responding Party further objects that the Request is overbroad, burdensome, and harassing, and seeks documents that are neither relevant nor reasonably calculated to lead to the discovery of admissible evidence. Responding Party further objects that this Request seeks documents protected by the privacy rights of Plaintiff and third parties. Responding Party further objects that the Request is vague and ambiguous, and overbroad, including as to time.

Subject to, and without waiver of the above-stated objections, Responding Party will produce non-privileged documents responsive to this Request regarding damages to the property owned by Plaintiff in the Bahamas during any time period when Defendant was present at that location, on a rolling basis on a timeline mutually agreeable to the parties.

15. Also all documents reflecting any agreements, contracts and payments by or on behalf of Depp (including any of his entities) and Tri Provide, LLC.

RESPONSE:

Plaintiff repeats and incorporates by this reference the General Objections and Objections to Definitions and Instructions above, as though set forth in full. Responding Party further objects to this Request on the grounds that it seeks documents that are neither relevant nor reasonably calculated to lead to the discovery of admissible evidence. Responding Party further objects to this Request on the grounds that it is overbroad, burdensome, and harassing, because it represents a blanket request for all agreements, contracts, and payments, without any limitation as to subject matter and without any effort to tailor the scope of the Request to the subject matter

of this action. Responding Party further objects to this Request to the extent that it could be construed to seek documents protected by the attorney-client privilege, work-product doctrine, and any other applicable privilege, immunity, or protection. Responding Party further objects to this Request on the grounds that it constitutes an invasion of privacy.

Accordingly, Responding Party will not produce documents in response to this Request.

16. All photographs of Ms. Amber Heard.

RESPONSE:

Plaintiff repeats and incorporates by this reference the General Objections and Objections to Definitions and Instructions above, as though set forth in full. Responding Party further objects to this Request to the extent that it could be construed to seek documents protected by the attorney-client privilege, work-product doctrine, or any other applicable privilege or immunity. Responding Party further objects that the Request is overbroad, burdensome, and harassing, and seeks documents that are neither relevant nor reasonably calculated to lead to the discovery of admissible evidence. Responding Party further objects that this Request seeks documents protected by the privacy rights of Plaintiff and third parties. Responding Party further objects that the Request is vague and ambiguous, and overbroad, including as to time.

Subject to, and without waiver of the above-stated objections, Responding Party will produce non-privileged documents responsive to this Request, on a rolling basis on a timeline mutually agreeable to the parties.

17. All photographs of Ms. Whitney Heard.

RESPONSE:

Plaintiff repeats and incorporates by this reference the General Objections and Objections to Definitions and Instructions above, as though set forth in full. Responding Party further objects to this Request to the extent that it could be construed to seek documents protected by the

attorney-client privilege, work-product doctrine, or any other applicable privilege or immunity. Responding Party further objects that the Request is overbroad, burdensome, and harassing, and seeks documents that are neither relevant nor reasonably calculated to lead to the discovery of admissible evidence. Responding Party further objects that this Request seeks documents protected by the privacy rights of Plaintiff and third parties. Responding Party further objects that the Request is vague and ambiguous, and overbroad, including as to time.

Subject to, and without waiver of the above-stated objections, Responding Party will produce non-privileged documents responsive to this Request, on a rolling basis on a timeline mutually agreeable to the parties.

18. All documents, including all communications, reflecting or relating in any manner to any claim that Ms. Amber Heard was engaging in a hoax, building a dossier, or insurance, setting up Mr. Depp, committing fraud, or fraudulently claiming Mr. Depp was engaging in domestic violence or abuse, prior to May 21, 2016.

RESPONSE:

Plaintiff repeats and incorporates by this reference the General Objections and Objections to Definitions and Instructions above, as though set forth in full. Responding Party further objects to this Request on the grounds that it seeks documents protected by the attorney-client privilege. Responding Party further objects to this Request on the grounds that it seeks documents protected by the work-product doctrine. Responding Party further objects to this Request on the grounds that it is vague and ambiguous and overbroad, including as to the use of the open-ended phrase “relating in any manner.”

Subject to, and without waiver of the above-stated objections, Responding Party will produce non-privileged documents responsive to this Request on a rolling basis, on a timeline mutually agreeable to the parties.

19. All documents, including all communications, reflecting or relating in any manner to any claim that Ms. Amber Heard was engaging in a hoax, building a dossier, or insurance,

setting up Mr. Depp, committing fraud, or fraudulently claiming Mr. Depp was engaging in domestic violence or abuse, prior to May 21, 2016.

RESPONSE:

Plaintiff repeats and incorporates by this reference the General Objections and Objections to Definitions and Instructions above, as though set forth in full. Responding Party further objects to this Request on the grounds that it seeks documents protected by the attorney-client privilege. Responding Party further objects to this Request on the grounds that it seeks documents protected by the work-product doctrine. Responding Party further objects to this Request on the grounds that it is vague and ambiguous and overbroad, including as to the use of the open-ended phrase “relating in any manner.”

Subject to, and without waiver of the above-stated objections, Responding Party will produce non-privileged documents responsive to this Request on a rolling basis, on a timeline mutually agreeable to the parties.

20. All documents, including all communications, reflecting or relating in any manner to any claim that Ms. Amber Heard was engaging in a hoax, building a dossier, or insurance, setting up Mr. Depp, committing fraud, or fraudulently claiming Mr. Depp was engaging in domestic violence or abuse, on or after May 21, 2016.

RESPONSE:

Plaintiff repeats and incorporates by this reference the General Objections and Objections to Definitions and Instructions above, as though set forth in full. Responding Party further objects to this Request on the grounds that it seeks documents protected by the attorney-client privilege. Responding Party further objects to this Request on the grounds that it seeks documents protected by the work-product doctrine. Responding Party further objects to this Request on the grounds that it is vague and ambiguous and overbroad, including as to the use of the open-ended phrase “relating in any manner.”

Subject to, and without waiver of the above-stated objections, Responding Party will produce non-privileged documents responsive to this Request on a rolling basis, on a timeline mutually agreeable to the parties.

21. All documents supporting any contention that Ms. Heard's career was enhanced, or she benefitted in any manner, by asserting that Mr. Depp had engaged in domestic violence or abuse.

RESPONSE:

Plaintiff repeats and incorporates by this reference the General Objections and Objections to Definitions and Instructions above, as though set forth in full. Responding Party further objects to this Request on the grounds that it seeks documents protected by the attorney-client privilege. Responding Party further objects to this Request on the grounds that it seeks documents protected by the work-product doctrine. Responding Party further objects to this Request on the grounds that it is vague and ambiguous and overbroad. Responding Party further objects to this Request on the grounds that it seeks documents that are publicly available, equally available to Defendant, and/or already in her possession.

Subject to, and without waiver of the above-stated objections, Responding Party will produce non-privileged documents responsive to this Request on a rolling basis, on a timeline mutually agreeable to the parties.

22. All documents, including all communications, relating in any manner to any assertion by Mr. Depp, or any of his family, friends, agents or representatives (including legal), that Ms. Amber Heard was engaging in a hoax, building a dossier, or insurance, setting up Mr. Depp, committing fraud, or fraudulently claiming Mr. Depp was engaging in domestic violence or abuse.

RESPONSE:

Plaintiff repeats and incorporates by this reference the General Objections and Objections to Definitions and Instructions above, as though set forth in full. Responding Party further objects to this Request on the grounds that it openly seeks documents protected by the attorney-

client privilege. Responding Party further objects to this Request on the grounds that it openly seeks documents protected by the work-product doctrine. Responding Party further objects to this Request on the grounds that it is vague and ambiguous and overbroad. Responding Party further objects to this Request on the grounds that it seeks documents that are publicly available, equally available to Defendant, and/or already in her possession.

Subject to, and without waiver of the above-stated objections, Responding Party will produce non-privileged documents responsive to this Request on a rolling basis, on a timeline mutually agreeable to the parties.

Dated: August 7, 2020

Respectfully submitted,



Benjamin G. Chew (VSB #29113)
Camille M. Vasquez (*pro hac vice*)
Andrew C. Crawford (VSB #89093)
BROWN RUDNICK, LLP
601 Thirteenth Street NW, Suite 600
Washington, DC 20005
Phone: (202) 536-1785
Fax: (617) 289-0717
bchew@brownrudnick.com

- and -

Adam R. Waldman
THE ENDEAVOR GROUP LAW FIRM, P.C.
1775 Pennsylvania Avenue NW, Suite 350
Washington, DC 20006

Counsel for Plaintiff John C. Depp, II

CERTIFICATE OF SERVICE

I hereby certify that on this 7th day of August 2020, I caused copies of the foregoing to be served via email (per written agreement between the Parties) on the following:

A. Benjamin Rottenborn (VSB No. 84796)
Joshua R. Treece (VSB No. 79149)
WOODS ROGERS PLC
10 S. Jefferson Street, Suite 1400
P.O. Box 14125
Roanoke, Virginia 24011
Telephone: (540) 983-7540
brottenborn@woodsrogers.com
jtreece@woodsrogers.com

Elaine Charlson Bredehopt (VSB No. 23766)
Carla D. Brown (VSB No. 44803)
Adam S. Nadelhaft (VSB No. 91717)
David E. Murphy (VSB No. 90938)
CHARLSON BREDEHOFT COHEN &
BROWN, P.C.
11260 Roger Bacon Dr., Suite 201
Reston, VA 20190
Phone: 703-318-6800
Fax: 703-318-6808
cbredehopt@cbeblaw.com
cbrown@cbeblaw.com
anadelhaft@cbeblaw.com
dmurphy@cbeblaw.com


Benjamin G. Chew

2. Plaintiff objects to each and every Request to the extent that the Requests (including the “Definitions” and “Instructions” identified in the Requests) (a) are overly broad or unduly burdensome; (b) are vague, ambiguous, duplicative, cumulative, or do not identify with reasonable particularity the information sought; (c) call for information that is neither relevant nor reasonably calculated to lead to the discovery of admissible evidence; (d) seek to impose obligations on Plaintiff beyond or inconsistent with those required by Virginia law and the rules of this Court (“Rules”); or (e) purport to seek documents or information not in Plaintiff’s actual possession, custody, or control; any statement herein that Plaintiff will produce documents responsive to a specific Request means that Plaintiff will produce documents located through a reasonable search for documents in its possession, custody, and control.

3. Plaintiff objects to the extent that the discovery sought by the Requests is obtainable from some other source that is more convenient, less burdensome, or less expensive.

4. Plaintiff objects to the extent the discovery sought is unduly burdensome or expensive, taking into account the needs of the case, the amount in controversy, limitations on the parties’ resources, and the importance of the issues at stake in the litigation.

5. Plaintiff objects to each and every Request, Definition, and Instruction to the extent that they purport to require production of documents at a specified time or place, or in a specified manner. Plaintiff will make documents available in accordance with Rule 4:9 and any agreement among the parties or orders of the Court governing the conduct of discovery.

6. Plaintiff objects to the Requests to the extent that they seek documents or information protected by the attorney-client privilege, the work product doctrine, or any other applicable privilege, protection, exemption or immunity. Plaintiff will produce only non-privileged information. Inadvertent disclosure of any privileged or otherwise protected

documents or information shall not constitute a waiver of any claim of privilege, protection, exemption or immunity. Plaintiff reserves the right to redact documents produced in response to the Requests.

7. Plaintiff objects to the Requests, including the Definitions and Instructions contained therein, to the extent they seek documents or information protected from disclosure as being a trade secret or other confidential business or proprietary information, or documents or information that, if produced or disclosed, would result in the violation of any contractual obligation to third parties, or any applicable right to privacy of Plaintiff or third parties.

8. Plaintiff objects to any Request seeking “all” documents on the grounds that Plaintiff cannot guarantee that he has located every single document responsive to a particular Request. Subject to the general objections and any qualifications below, Plaintiff will respond to any Request seeking “all” documents by producing the responsive, non-privileged documents within its possession, custody, and control that can be located after a reasonable search conducted in good faith

9. Plaintiff reserves the right to produce documents responsive to the Requests on a rolling basis at a time, place, and manner to be agreed on by the parties.

10. Plaintiff objects to the Requests, including the Definitions and Instructions contained therein, to the extent that they are redundant or duplicative of other specific Requests. Where information or a document may be responsive to more than one Request, Plaintiff will provide that information or produce that document only once.

11. Plaintiff objects to the Requests to the extent that they purport to require the identification and/or restoration of any deleted, legacy, backup, or archival data, or otherwise

seek the production of any document that is not accessible without undue burden or unreasonable expense.

12. Plaintiff objects to each of the Requests to the extent that the Requests or related Instructions purport to impose any discovery obligations on Plaintiff beyond those already imposed by applicable law.

13. Plaintiff's responses to the Requests are not intended to be, nor shall be deemed, an admission of matters stated, implied, or assumed by any or all of the Requests. In responding to the Requests, Plaintiff neither waives nor intends to waive, but expressly reserves, any and all objections as to the authenticity, relevance, competency, materiality, or admissibility at trial or during any proceeding of any information or documents produced, set forth, or referred to herein.

14. Any response by Plaintiff stating that it will produce documents is not intended as a representation that such documents exist within any requested category or categories but solely as an assertion that Plaintiff will produce (consistent with these Responses and Objections) any non-privileged, responsive documents or information within its actual possession, custody, or control that can be located after a reasonable search conducted in good faith.

15. Plaintiff objects to any factual assumptions, implications, and explicit or implicit characterizations of facts, events, circumstances, or issues in the Requests. Plaintiff's responses herein are not intended to mean that Plaintiff agrees with any factual assumptions, implications, or any explicit or implicit characterization of facts, events, circumstances, or issues in the Requests, and are without prejudice to Plaintiff's right to dispute facts and legal conclusions assumed in the Requests.

16. These objections and responses are based on Plaintiff's present knowledge, information, and belief, and therefore remain subject to change or modification based on further

discovery of facts or circumstances that may come to Plaintiff's attention. Plaintiff reserves the right to rely on any facts, documents, evidence, or other contentions that may develop or come to its attention at a later time and to supplement or amend the responses at any time prior to the trial. Plaintiff further reserves the right to raise any additional objections deemed necessary or appropriate in light of any further review.

OBJECTIONS TO INSTRUCTIONS AND DEFINITIONS

Instructions

1. In accordance with the Rules of this Court, You shall answer the following Requests separately and fully, in writing.

RESPONSE: No objection.

2. Where information in Your possession is requested, such request includes nonprivileged information in the possession of Your agent(s), employee(s), assign(s), representative(s), and all others acting on Your behalf.

RESPONSE: Plaintiff objects to this instruction as overly broad and unduly burdensome, to the extent that it requires production of documents from individuals not under Plaintiff's control. Plaintiff will produce documents from a limited number of custodians to be negotiated with Defendant in good faith.

3. Whenever appropriate in these Requests, the singular form of a word shall be interpreted as its plural to whatever extent is necessary to bring within the scope of these Requests any information which might otherwise be construed to be outside their scope.

RESPONSE: No objection.

4. Unless otherwise indicated, these Requests refer to the time, place, and circumstances of the occurrences mentioned or complained of in the pleadings in this case.

RESPONSE: Plaintiff objects to this instruction as overly broad and unduly burdensome, to the extent that it requires production of documents not within the possession, custody or control of Plaintiff. Plaintiff will produce documents from

a relevant time period to be negotiated with Defendant in good faith. Plaintiff further objects to this instruction as vague and ambiguous.

5. All references to an entity include the entity and its agents, officers, employees, representatives, subsidiaries, divisions, successors, predecessors, assigns, parents, affiliates, and unless privileged, its attorneys and accountants.

RESPONSE: Plaintiff objects to this instruction as overly broad and unduly burdensome, to the extent that it requires production of documents from individuals and entities other than Plaintiff and/or documents that are not within Plaintiff's custody and control.

6. If You perceive any ambiguities in a question, instruction, definition, or other aspect of these discovery requests, set forth the matter deemed ambiguous and the construction used in answering.

RESPONSE: No objection.

7. If You assert a claim of privilege as to any of Your responses to the Requests, state the basis for the asserted privilege, specify the privilege claimed, and include in Your answer sufficient information to permit the Court to make an informed ruling on the claim of privilege. If the claim relates to a privileged document, state the date, person or persons who prepared or participated in preparing the document, the name and address of any person to whom the document was shown or sent, the general subject matter of the document, the present or last known location and custodian of the original of the document, and the basis for the claim of privilege with respect to the document. If the claim of privilege relates to a communication, state the date(s), place(s) and person(s) involved in the communication, the subject matter of the communication, and the basis for the claim of privilege with respect to that communication. Reliance on any claim of privilege is subject to the Rules of this Court, including the production of a privilege log.

RESPONSE: Plaintiff objects to this instruction as overly broad and unduly burdensome, to the extent that it requires Plaintiff to produce a privilege log in a specific manner at a specific time. Plaintiff will produce a privilege log at a time and in a manner to be negotiated with Defendant in good faith.

8. If You perceive any Request to be overly broad, unduly burdensome, or objectionable for any other reason, respond to the fullest extent possible and clearly note any objection so that the Court will be permitted to make an informed ruling on the objection.

RESPONSE: No objection.

9. These Requests are continuing in character so as to require You to promptly amend or supplement Your responses in accordance with the Rules of the Supreme Court of Virginia within a reasonable time if You obtain or become aware of any further information responsive to these Requests. Ms. Heard reserves the right to propound additional Requests.

RESPONSE: No objection.

10. Unless otherwise indicated, these requests include the time from when the parties met, in 2008.

RESPONSE: Plaintiff objects to this instruction as overly broad, unduly burdensome, and harassing to the extent that it purports to require Plaintiff to produce documents from a twelve-year timeframe that encompasses documents that are not relevant to the subject matter of this action.

Definitions

a. ***Action.*** The term “Action” means the above-captioned action.

RESPONSE: No objection.

b. ***Communication.*** The term “communication” means any oral or written exchange of words, thoughts, or ideas to another person, whether person-to-person, in a group, by phone, text (SMS), letter, fax, e-mail, internet post or correspondence, social networking post or correspondence or by any other process, electric, electronic, or otherwise. All such

Communications are included without regard to the storage or transmission medium (electronically stored information and hard copies are included within this definition).

RESPONSE: No objection.

c. ***Document.*** The term “document” is defined in its broadest terms currently recognized. The term shall include, without limitations: any written or other compilation of information (whether printed, handwritten, recorded, or encoded, produced, reproduced, or reproducible by any other process), drafts (revisions or finals), original or preliminary notes, and summaries of other documents, communications of any type (e-mail, text messages, blog posts, social media posts or other similar communications or correspondence), computer tape, computer files, and including all of their contents and attached files. The term “document” shall also include but not be limited to: correspondence, memoranda, contractual documents, specifications, drawings, photographs, images, aperture cards, notices of revisions, test reports, inspection reports, evaluations, technical reports, schedules, agreements, reports, studies, analyses, projections, forecasts, summaries, records of conversations or interviews, minutes or records of conferences or meetings, manuals, handbooks, brochures, pamphlets, advertisements, circulars, press releases, financial statements, calendars, diaries, trip reports, etc. A draft of a non-identical copy is a separate document within the meaning of this term.

RESPONSE: Plaintiff objects to this definition as overly broad and unduly burdensome, and to the extent that it seeks to impose burdens beyond what are required by the Rules.

d. ***Correspondence.*** The term “correspondence” means any document(s) and/or communication(s) sent to or received from another entity and/or person.

RESPONSE: Plaintiff objects to this definition as overly broad and unduly burdensome, to the extent that it is duplicative of the terms Document and Communication, and to the extent that it seeks to impose burdens beyond what are required by the Rules.

e. **Person.** The term “person” is defined as any natural person, business, company, partnership, legal entity, governmental entity, and/or association.

RESPONSE: No objection.

f. **Concerning.** The term “concerning” includes relating to, referring to, describing, evidencing, or constituting.

RESPONSE: No objection.

g. **Including.** The term “including” means including but not limited to.

RESPONSE: No objection.

h. **And/or.** The use of “and/or” shall be interpreted in every instance both conjunctively and disjunctively in order to bring within the scope of these discovery requests any information which might otherwise be construed to be outside their scope.

RESPONSE: No objection.

i. **Defendant and/or Ms. Heard.** The terms “Defendant” and/or “Ms. Heard” refer to Defendant Amber Laura Heard, including her agents, representatives, employees, assigns, and unless privileged, all persons acting on her behalf.

RESPONSE: Plaintiff objects to this definition as overly broad and unduly burdensome, to the extent that it is inclusive of “agents, representatives, employees, assigns, and unless privileged, all persons acting on her behalf.”

j. **Plaintiff and/or Mr. Depp.** The terms “Plaintiff” and/or “Mr. Depp” refer to Plaintiff John C. Depp, II, including his agents, representatives, employees, assigns, and all persons acting on his behalf.

RESPONSE: Plaintiff objects to this definition as overly broad and unduly burdensome, to the extent that it is inclusive of “agents, representatives, employees, assigns, and all persons acting on his behalf.” Plaintiff will interpret this term to exclude all privileged communications and documents.

k. **Complaint.** The term "Complaint" shall mean the Complaint filed by Plaintiff in this Action.

RESPONSE: No objection.

l. **Romantic Partners.** The term "Romantic Partners" shall mean any persons You have touched in a sexual manner in the past ten (10) years, meaning: (a) direct contact between any part of Your body and another person's genitalia, anus, groin, breast, inner thigh, or buttocks; or (b) direct contact between any part of a third party's body and Your genitalia, anus, groin, breast, inner thigh, or buttocks.

RESPONSE:

m. **You and/or Your.** The terms "You" and/or "Your" refer to the recipient(s) of these discovery requests, as well as all persons and entities over which said recipient has "control" as understood by the Rules of this Court.

RESPONSE: No objection.

REQUESTS

1. Copies of the all retention agreements, description of work performed, and invoice submitted by Mr. Edward White and Edward White and Co., LLP from the period March 14, 2016 through February 28, 2017.

RESPONSE:

Plaintiff repeats and incorporates by this reference the General Objections and Objections to Definitions and Instruction above, as though set forth in full. Plaintiff further objects on the grounds that this Request is overbroad, unduly burdensome, and harassing, as it represents an improper request for a description of any and all work, agreements, and invoicing by Plaintiff's business managers over a period of roughly a year. Plaintiff further objects to this Request on the grounds that it seeks information that is neither relevant, nor reasonably calculated to lead to the discovery of admissible evidence. Plaintiff further objects to this Request on the grounds that

it is vague and ambiguous, and further objects to this Request to the extent that it purports to require Plaintiff to generate any documents that do not already exist, including as to its request for a “description of work performed,” which appears to be more in the nature of an interrogatory than a request for production. Plaintiff further objects to this Request on the grounds that it seeks documents protected by the attorney-client privilege and work product doctrine, including but not limited to the extent that it implicates work performed related to litigation matters. Plaintiff further objects to this Request on the grounds that it seeks information that is private and personal and protected by law, because, among other reasons, it seeks information related to Plaintiff’s personal, financial, and other private matters, that are not at issue in this action and are protected from disclosure. Plaintiff further objects that this Request seeks information related to the proprietary work and billing and other practices of Edward White and Edward White & Co., which information is irrelevant and an inappropriate avenue of discovery. Plaintiff further objects to this Request on the grounds and to the extent that it implicates any other applicable privilege or immunity.

Accordingly, Plaintiff will not produce documents in response to this Request.

2. All documents supporting or otherwise relating to the allegations contained in paragraph 6 of the Second Witness Statement of Edward White, attached as Exhibit A.

RESPONSE:

Plaintiff repeats and incorporates by this reference the General Objections and Objections to Definitions and Instructions above, as though set forth in full. Plaintiff further objects to this Request on the grounds that it is overbroad, burdensome, and harassing, because, among other reasons, it seeks “all documents supporting or otherwise relating” to the statement that “during the period of the marriage between Mr. Depp and Ms. Amber Heard.... their costs, expenses, and liabilities substantially exceeded the net income of Mr. Depp,” and as such amounts to a blanket

request for all documents that in any way relate to any costs, expenses, liabilities, and/or income of Mr. Depp and Ms. Heard, over a period of more than a year, and potentially implicates a vast quantity of documents that are of marginal or no relevance to the issues in this action, and would be unduly burdensome to compile. Plaintiff further objects to this Request on the grounds that it seeks documents that are neither relevant nor reasonably calculated to lead to the discovery of admissible evidence. Plaintiff further objects to this Request on the grounds that it seeks documents protected by the attorney-client privilege and work product doctrine. Plaintiff further objects to this Request on the grounds that it seeks information that is private and personal and protected by law, because, among other reasons, it seeks information related to Plaintiff's personal, financial, and other private matters, that are not at issue in this action and are protected from disclosure. Plaintiff further objects to this Request on the grounds and to the extent that it implicates any other applicable privilege or immunity. Plaintiff further objects to this Request on the grounds and to the extent that it seeks expert discovery that is premature and/or beyond the scope of expert discovery permitted under the applicable rules.

Subject to, and without waiver of the foregoing objections, Plaintiff will agree to produce non-privileged documents sufficient to show the total amount of costs, expenses, and liabilities incurred by Mr. Depp and Ms. Heard during their marriage, and Mr. Depp's total income during their marriage.

3. All documents supporting or otherwise relating to the allegations contained in paragraph 7 of the Second Witness Statement of Edward White, attached as Exhibit A.

RESPONSE:

Plaintiff repeats and incorporates by this reference the General Objections and Objections to Definitions and Instructions above, as though set forth in full. Plaintiff further objects to this Request on the grounds that it is overbroad, burdensome, and harassing. Plaintiff further objects

to this Request on the grounds that it seeks documents that are neither relevant nor reasonably calculated to lead to the discovery of admissible evidence. Plaintiff further objects to this Request on the grounds that it seeks documents protected by the attorney-client privilege and work product doctrine. Plaintiff further objects to this Request on the grounds that it seeks information that is private and personal and protected by law, because, among other reasons, it seeks information related to Plaintiff's personal, financial, and other private matters, that are not at issue in this action and are protected from disclosure. Plaintiff further objects to this Request on the grounds and to the extent that it implicates any other applicable privilege or immunity. Plaintiff further objects to this Request on the grounds and to the extent that it seeks expert discovery that is premature and/or beyond the scope of expert discovery permitted under the applicable rules. Plaintiff further objects to this Request on the grounds that it relates to a settlement agreement that is in the possession of Defendant and was negotiated by Defendant's attorneys, which document is already in Defendant's possession and speaks for itself.

4. All documents supporting or otherwise relating to the allegations contained in paragraph 8 of the Second Witness Statement of Edward White, attached as Exhibit A.

RESPONSE:

Plaintiff repeats and incorporates by this reference the General Objections and Objections to Definitions and Instructions above, as though set forth in full. Plaintiff further objects to this Request on the grounds that it is overbroad, burdensome, and harassing, because, among other reasons, it seeks "all documents supporting or otherwise relating" to the statement that "during the period of the marriage between Mr. Depp and Ms. Amber Heard.... their costs, expenses, and liabilities substantially exceeded the net income of Mr. Depp," and as such amounts to a blanket request for all documents that in any way relate to any costs, expenses, liabilities, and/or income of Mr. Depp and Ms. Heard, over a period of more than a year, and potentially implicates a vast

quantity of documents that are of marginal or no relevance to the issues in this action, and would be unduly burdensome to compile. Plaintiff further objects to this Request on the grounds that it seeks documents that are neither relevant nor reasonably calculated to lead to the discovery of admissible evidence. Plaintiff further objects to this Request on the grounds that it seeks documents protected by the attorney-client privilege and work product doctrine. Plaintiff further objects to this Request on the grounds that it seeks information that is private and personal and protected by law, because, among other reasons, it seeks information related to Plaintiff's personal, financial, and other private matters, that are not at issue in this action and are protected from disclosure. Plaintiff further objects to this Request on the grounds and to the extent that it implicates any other applicable privilege or immunity. Plaintiff further objects to this Request on the grounds and to the extent that it seeks expert discovery that is premature and/or beyond the scope of expert discovery permitted under the applicable rules.

Subject to, and without waiver of the foregoing objections, Plaintiff will agree to produce non-privileged documents sufficient to show the total amount of costs, expenses, and liabilities incurred by Mr. Depp and Ms. Heard during their marriage, and Mr. Depp's total income during their marriage.

5. All documents supporting or otherwise relating to the allegations contained in paragraph 9 (including 9(a)-(e)) of the Second Witness Statement of Edward White, attached as Exhibit A.

RESPONSE:

Plaintiff repeats and incorporates by this reference the General Objections and Objections to Definitions and Instructions above, as though set forth in full. Plaintiff further objects to this Request on the grounds that it is overbroad, burdensome, and harassing. Plaintiff further objects to this Request on the grounds that it seeks documents that are neither relevant nor reasonably calculated to lead to the discovery of admissible evidence. Plaintiff further objects to this

Request on the grounds that it seeks documents protected by the attorney-client privilege and work product doctrine. Plaintiff further objects to this Request on the grounds that it seeks information that is private and personal and protected by law, because, among other reasons, it seeks information related to Plaintiff's personal, financial, and other private matters, that are not at issue in this action and are protected from disclosure. Plaintiff further objects to this Request on the grounds and to the extent that it implicates any other applicable privilege or immunity. Plaintiff further objects to this Request on the grounds and to the extent that it seeks expert discovery that is premature and/or beyond the scope of expert discovery permitted under the applicable rules. Plaintiff further objects to this Request on the grounds that it relates to a settlement agreement that is in the possession of Defendant and was negotiated by Defendant's attorneys, which document is already in Defendant's possession and speaks for itself.

6. All documents and communications that refer or relate to the April 21, 2016 meeting involving Mr. Edward White.

RESPONSE:

Plaintiff repeats and incorporates by this reference the General Objections and Objections to Definitions and Instruction above, as though set forth in full. Plaintiff further objects on the grounds that this Request is overbroad, unduly burdensome, and harassing. Plaintiff further objects to this Request on the grounds that it seeks information that is neither relevant, nor reasonably calculated to lead to the discovery of admissible evidence. Plaintiff further objects to this Request on the grounds that it seeks documents protected by the attorney-client privilege and work product doctrine. Plaintiff further objects to this Request on the grounds that it seeks information that is private and personal and protected by law, because, among other reasons, it seeks information related to Plaintiff's personal, financial, and other private matters, that are not at issue in this action and are protected from disclosure. Plaintiff further objects that this

Request seeks information related to the proprietary work and analysis practices of Edward White and Edward White & Co., which information is irrelevant and an inappropriate avenue of discovery. Plaintiff further objects to this Request on the grounds and to the extent that it implicates any other applicable privilege or immunity. Plaintiff further objects to this Request on the grounds that it is vague and ambiguous, including as to the term "April 21, 2016 meeting," which is undefined. Assuming that the term refers to a meeting between Plaintiff and his business managers that implicated the totality of Plaintiff's financial circumstances and related litigation matters, Plaintiff also objects to this Request on the grounds that such matters are beyond the scope of this litigation, and subject to claims of privilege and privacy, as well as protective orders entered by the courts of the State of California.

Accordingly, Plaintiff will not produce documents in response to this Request.

7. All documents that refer or relate to communications to or from anyone acting by or on behalf of Mr. Depp or to or from Mr. Depp that refer or relate to the April 21, 2016 business meeting involving Mr. Edward White, including documents and communications related to setting up the meeting, the agenda, the content, and all documents and communications created, sent or received before and/or after the meeting that refer or relate to the April 21, 2016 business meeting involving Mr. Edward White.

RESPONSE:

Plaintiff repeats and incorporates by this reference the General Objections and Objections to Definitions and Instruction above, as though set forth in full. Plaintiff further objects on the grounds that this Request is overbroad, unduly burdensome, and harassing. Plaintiff further objects to this Request on the grounds that it seeks information that is neither relevant, nor reasonably calculated to lead to the discovery of admissible evidence. Plaintiff further objects to this Request on the grounds that it seeks documents protected by the attorney-client privilege and work product doctrine. Plaintiff further objects to this Request on the grounds that it seeks information that is private and personal and protected by law, because, among other reasons, it

seeks information related to Plaintiff's personal, financial, and other private matters, that are not at issue in this action and are protected from disclosure. Plaintiff further objects that this Request seeks information related to the proprietary work and analysis and practices of Edward White and Edward White & Co., which information is irrelevant and an inappropriate avenue of discovery. Plaintiff further objects to this Request on the grounds and to the extent that it implicates any other applicable privilege or immunity. Plaintiff further objects to this Request on the grounds that it is vague and ambiguous, including as to the term "April 21, 2016 meeting," which is undefined. Assuming that the term refers to a meeting between Plaintiff and his business managers that implicated the totality of Plaintiff's financial circumstances and related litigation matters, Plaintiff also objects to this Request on the grounds that such matters are beyond the scope of this litigation, and subject to claims of privilege and privacy, as well as protective orders entered by the courts of the State of California.

Accordingly, Plaintiff will not produce documents in response to this Request.

8. All videos, photographs, audio recordings and transcripts, relating in any manner to the claims or defenses in this litigation, including all meta data and original source information.

RESPONSE:

Plaintiff repeats and incorporates by this reference the General Objections and Objections to Definitions and Instruction above, as though set forth in full. Plaintiff further objects on the grounds that this Request is overbroad, unduly burdensome, and harassing, because it represents an open-ended request for documents that may somehow relate to unspecified claims and defenses, directly implicating the analysis of counsel. Plaintiff further objects to this Request on the grounds and to the extent that it seeks information that is neither relevant, nor reasonably calculated to lead to the discovery of admissible evidence. Plaintiff further objects to this Request on the grounds that it seeks documents protected by the attorney-client privilege and

work product doctrine, because, among other reasons, it directly implicates the work product of counsel as to what documents may relate in some manner to the claims and defenses in this action. Plaintiff further objects to this Request on the grounds that it seeks information that is private and personal and protected by law, because, among other reasons, it seeks information related to Plaintiff's personal, financial, and other private matters, that are not at issue in this action and are protected from disclosure. Plaintiff further objects to this Request on the grounds and to the extent that it implicates any other applicable privilege or immunity. Plaintiff further objects to this Request on the grounds that it is vague and ambiguous to the point of unintelligibility, as Defendant has failed to reasonably identify the subject matter of the documents sought.

Accordingly, Plaintiff will not produce documents in response to this Request, as it is currently framed. Plaintiff will meet and confer with Defendant, and is willing to produce appropriate, non-privileged documents relevant to the parties' claims and defenses in response to more targeted discovery requests that clearly specify the subject matter of each request.

9. All preservation notices received by Mr. Depp or his counsel or agents from May 21, 2016 through the present.

RESPONSE:

Plaintiff repeats and incorporates by this reference the General Objections and Objections to Definitions and Instruction above, as though set forth in full. Plaintiff further objects on the grounds that this Request is overbroad, unduly burdensome, and harassing, because it is unlimited in scope and seeks documents that have no relation to the subject matter of this litigation. Indeed, in its present form it could be construed so broadly as to seek preservation notices received by Plaintiff's counsel in connection with the representation of clients other than Plaintiff. Plaintiff further objects to this Request on the grounds that it seeks information that is

neither relevant, nor reasonably calculated to lead to the discovery of admissible evidence. Plaintiff further objects to this Request on the grounds that it seeks documents protected by the attorney-client privilege and work product doctrine. Plaintiff further objects to this Request on the grounds that it seeks information that is private and personal and protected by law. Plaintiff further objects to this Request on the grounds and to the extent that it implicates any other applicable privilege or immunity.

Accordingly, Plaintiff will not produce documents in response to this Request.

10. Documents reflecting all efforts to preserve the full video footage from the Eastern Columbia Building during the period May-August 2016.


RESPONSE:

Plaintiff repeats and incorporates by this reference the General Objections and Objections to Definitions and Instructions above, as though set forth in full. Plaintiff further objects on the grounds that this Request is overbroad, unduly burdensome, and harassing and seeks documents that are neither relevant nor reasonably calculated to lead to the discovery of admissible evidence. Plaintiff further objects to this Request on the grounds that it is vague and ambiguous. Plaintiff further objects to this Request on the grounds that it seeks documents protected by the attorney-client privilege and work product doctrine. Plaintiff further objects to this Request on the grounds that it is duplicative of *multiple* other requests by Defendant, in response to which Plaintiff has already agreed to produce documents, if any.

Subject to and without waiver of the foregoing objections, Plaintiff will agree to produce non-privileged documents responsive to this Request, if any, on a rolling basis.

Dated: August 17, 2020

Respectfully submitted,


Benjamin G. Chew (VSB #29113)
Camille M. Vasquez (*pro hac vice*)
Andrew C. Crawford (VSB #89093)
BROWN RUDNICK, LLP
601 Thirteenth Street NW, Suite 600
Washington, DC 20005
Phone: (202) 536-1785
Fax: (617) 289-0717
bchew@brownrudnick.com

- and -

Adam R. Waldman
THE ENDEAVOR GROUP LAW FIRM, P.C.
1775 Pennsylvania Avenue NW, Suite 350
Washington, DC 20006

Counsel for Plaintiff John C. Depp, II

CERTIFICATE OF SERVICE

I hereby certify that on this 17th day of August 2020, I caused copies of the foregoing to be served via email (per written agreement between the Parties) on the following:

A. Benjamin Rottenborn (VSB No. 84796)
Joshua R. Treece (VSB No. 79149)
WOODS ROGERS PLC
10 S. Jefferson Street, Suite 1400
P.O. Box 14125
Roanoke, Virginia 24011
Telephone: (540) 983-7540
brottenborn@woodsrogers.com
jtreece@woodsrogers.com

Elaine Charlson Bredehoft (VSB No. 23766)
Carla D. Brown (VSB No. 44803)
Adam S. Nadelhaft (VSB No. 91717)
David E. Murphy (VSB No. 90938)
CHARLSON BREDEHOFT COHEN &
BROWN, P.C.
11260 Roger Bacon Dr., Suite 201
Reston, VA 20190
Phone: 703-318-6800
Fax: 703-318-6808
ebredehoft@cbcblaw.com
cbrown@cbcblaw.com
anadelhaft@cbcblaw.com
dmurphy@cbcblaw.com



Andrew C. Crawford