

[] This SUBPOENA/SUBPOENA DUCES TECUM TO PERSON UNDER FOREIGN SUBPOENA is being served by a private process server who must provide proof of service in accordance with Va. Code § 8.01-325.

TO the person authorized to serve this process: Upon execution, the return of this process shall be made to the Clerk of Court.

NAME: <u>Custodian of Records of The Mandel Company, Inc.</u>	
ADDRESS: <u>8383 Wilshire Blvd., Suite 400</u> <u>Beverly Hills, CA 90211</u>	
<input type="checkbox"/> PERSONAL SERVICE	Tel. No. _____
Being unable to make personal service, a copy was delivered in the following manner:	
<input type="checkbox"/> Delivered to family member (not temporary sojourner or guest) age 16 or older at usual place of abode of party named above after giving information of its purport. List name, age of recipient, and relation of recipient to party named above: _____ _____	
<input type="checkbox"/> Posted on front door or such other door as appears to be the main entrance of usual place of abode, address listed above. (Other authorized recipient not found.)	
<input type="checkbox"/> not found	_____, Sheriff
_____ DATE	by _____, Deputy Sheriff

JOHN T. FREY, CLERK
FAIRFAX COUNTY CIRCUIT COURT
4110 CHAIN BRIDGE ROAD
FAIRFAX, VIRGINIA 22030

**SUBPOENA/SUBPOENA DUCES TECUM
TO PERSON UNDER FOREIGN SUBPOENA**

File No. 2019-002911

Commonwealth of Virginia VA CODE §§ 8.01-412.8—8.01-412.15; Rule 4:9

Fairfax County Circuit Court

4110 Chain Bridge Road, 3rd Floor, Fairfax, VA 22030

ADDRESS OF COURT

JOHN C. DEPP, II

v./In re: AMBER LAURA HEARD

TO THE PERSON AUTHORIZED BY LAW TO SERVE THIS PROCESS:

You are commanded to summon

Custodian of Records of The Mandel Company, Inc.

NAME

8383 Wilshire Blvd., Suite 400

STREET ADDRESS

Beverly Hills

CA

90211

CITY

STATE

ZIP

TO THE PERSON SUMMONED: You are commanded to

attend and give testimony at a deposition

produce the books, documents, records, electronically stored information, and tangible things designated and described below

PLEASE SEE ATTACHMENT

FILED
CIVIL INTAKE
2020 AUG 17 PM 2:59
JOHN T. FREY
CLERK, CIRCUIT COURT
FAIRFAX, VA

at Gordon Rees, 633 West Fifth Street, 52nd Floor, Los Angeles, CA 90071

LOCATION

at September 11, 2020 at 9:00am

DATE AND TIME

and to permit inspection and copying by the requesting party or someone acting in his or her behalf of the designated items in your possession, custody or control

permit inspection of the premises

at the following location

LOCATION

on

DATE AND TIME

This subpoena is issued upon the request of the party named below

Defendant Amber Laura Heard

NAME OF REQUESTING PARTY

c/o Charlson Bredehoff Cohen & Brown, P.C., 11260 Roger Bacon Drive, Suite 201

STREET ADDRESS

Reston

VA

20190

703-318-6800

CITY

STATE

ZIP

TELEPHONE NUMBER

The requesting party has submitted to this Clerk's Office the foreign subpoena, copy attached, the terms of which are incorporated herein, and the written statement required by Virginia Code § 8.01-412.10.

The names, addresses and telephone numbers of all counsel of record in the proceeding to which the subpoena relates and of parties not represented by counsel are provided [] below [] on attached list.

August 18th, 2020

DATE ISSUED

JOHN T. FREY, CLERK

CLERK

by

DEPUTY CLERK

Elaine Charlson Bredehoff for Defendant
NAME OF ATTORNEY FOR REQUESTING PARTY

23766
BAR NUMBER

VA
LICENSING STATE

11260 Roger Bacon Drive, Suite 201
OFFICE ADDRESS

703-318-6800
TELEPHONE NUMBER OF ATTORNEY

Reston, VA 20190
OFFICE ADDRESS

703-318-6808
FACSIMILE NUMBER OF ATTORNEY

NAME

BAR NUMBER

LICENSING STATE

STREET ADDRESS

TELEPHONE NUMBER

STREET ADDRESS

FACSIMILE NUMBER

NAME

BAR NUMBER

LICENSING STATE

STREET ADDRESS

TELEPHONE NUMBER

STREET ADDRESS

FACSIMILE NUMBER

NAME

BAR NUMBER

LICENSING STATE

STREET ADDRESS

TELEPHONE NUMBER

STREET ADDRESS

FACSIMILE NUMBER

RETURN OF SERVICE (see page three of this form)

VIRGINIA:

IN THE CIRCUIT COURT OF FAIRFAX COUNTY

JOHN C. DEPP, II,

Plaintiff,

v.

AMBER LAURA HEARD,

Defendant.

Civil Action No.: CL-2019-0002911

COUNSEL OF RECORD FOR ALL PARTIES

<p>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 <i>Counsel for Plaintiff John C. Depp, II</i></p>	<p>Camille M. Vasquez (admitted <i>pro hac vice</i>) BROWN RUDNICK LLP 2211 Michelson Drive Irvine, CA 92612 Telephone: (949) 752-7100 Facsimile: (949) 252-1514 cvasquez@brownrudnick.com <i>Counsel for Plaintiff John C. Depp, II</i></p>
	<p>Adam R. Waldman THE ENDEAVOR LAW FIRM, P.C. 1775 Pennsylvania Avenue, N.W., Suite 350 Washington, DC 20006 awaldman@theendevorgroup.com <i>Counsel for Plaintiff John C. Depp, II</i></p>
<p>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 <i>Counsel for Defendant Amber Laura Heard</i></p>	<p>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 broddenborn@woodsrogers.com jtreece@woodsrogers.com <i>Counsel for Defendant Amber Laura Heard</i></p>

ATTACHMENT

John C. Depp, II v. Amber Laura Heard Fairfax County Circuit Court: CL 2019-0002911

DEFINITIONS

- a. **Action.** The term "Action" means the above-captioned action.
- b. **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.
- c. **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, photographs, video or audio tape recordings, 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).
- d. **Complaint.** The term "Complaint" means the Complaint, dated March 1, 2019, filed in this Action.
- e. **Concerning.** The term "concerning" includes relating to, referring to, describing, evidencing, or constituting.
- f. **Correspondence.** The term "correspondence" means any document(s) and/or communication(s) sent to or received from another entity and/or person.
- g. **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 all persons acting on her behalf.
- h. **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, audio or video recordings, 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.

l. **Engaged.** The term "Engaged," in relation to a person (as defined herein), means contracted, directed, hired, retained, formed an agreement with (whether formal or informal, binding or nonbinding, written or oral), and/or procured the services of, whether or not in exchange for remuneration or other valuable consideration.

j. **Including.** The term "including" means including but not limited to.

k. **The Mandel Lawsuit.** The term means the litigation entitled John C. Depp, II, et al. v. The Mandel Company, Inc., et al., Case No. BC 646882.

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

l. **Performance.** The term "Performance," in relation to Mr. Depp, means any creative work in which Mr. Depp or his likeness is, was, will be, may be, or is contemplated to appear, whether or not in exchange for payment or other benefit to Mr. Depp, and includes (without limitation) any appearance (or potential appearance) by Mr. Depp in any film, TV series, product endorsement, advertisement, musical performance, or in-person appearance. To avoid doubt, a Performance includes any creative work in which it was contemplated that Mr. Depp or his likeness would be featured, even if the work was ultimately created without Mr. Depp or his likeness appearing.

m. **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 both individually or as entities.

n. **Requests.** The term "Requests" shall mean the requests for documents to be produced under this Subpoena as set forth in this Attachment.

o. **You and/or Your.** The terms "You" and/or "Your" refer to the recipient of this Subpoena, as well as all persons and entities over which said recipient has "control" as understood by the Rules of this Court.

INSTRUCTIONS

1. Where information in Your possession is requested, such request includes non-privileged information in the possession of Your agent(s), employee(s), assign(s), representative(s), and all others acting on Your behalf.
2. 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.
3. 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.
4. 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.
5. If You perceive any ambiguities in a question, instruction, definition, or other aspect of this Subpoena, set forth the matter deemed ambiguous and the construction used in answering.
6. 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 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.
7. 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 as to permit an informed ruling on the objection.
8. These Requests are continuing in character so as to require You to promptly amend or supplement Your production of documents within a reasonable time if You obtain or become aware of any further documents responsive to this Subpoena.

DOCUMENTS TO BE PRODUCED UNDER THIS SUBPOENA

In response to this subpoena, you are required to produce the original or an exact copy of the following:

1. Copies of all pleadings filed in the Mandel Lawsuit.
2. Copies of all discovery pleadings exchanged between the parties in the Mandel Lawsuit.
3. Copies of all documents reflecting or disputing Mr. Depp's claims and UK testimony that You did not file tax returns on Mr. Depp's behalf for 17 years.
4. Copies of all documents reflecting or disputing Mr. Depp's claims and testimony that You caused Mr. Depp to lose his entire fortune.
5. Copies of all documents reflecting Mr. Depp's claims that he was essentially bankrupt as a result of Your actions and inactions.
6. Copies of all depositions, including videos, and all transcripts of any proceedings in the Mandel Lawsuit.
7. Copies of all documents relating to Ms. Heard.
8. Copies of all documents relating in any manner to Mr. Depp's use of drugs or alcohol, including but not limited to the types, amount and any payment for drugs and alcohol, or consequences for drug and/or alcohol use by Mr. Depp.
9. Copies of all documents relating in any manner to Mr. Depp engaging in any destruction of property, including any photographs, videos, audio recordings, invoices or payments to any individual or entity for repairs, replacements or to otherwise compensate for damage;
10. Copies of all documents relating in any manner to Mr. Depp engaging in violence of any nature, including any person or property. This includes the type of violence, upon whom or what inflicted, any evidence of the damages, any medical records or other documentations, any photographs, videos or audio recordings, and any payments made as a result of such violence.
11. All documents relating in any manner to efforts by Mr. Depp to obtain a prenuptial or postnuptial agreement with Ms. Heard.
12. All documents reflecting any study or examination of trends in Mr. Depp's career successes or failures, including any projections of income over any period of time.
13. All documents reflecting Mr. Depp being aware of his financial condition during the period December 1, 2015 through and including May 30, 2016.
14. All documents supporting or otherwise relating to the allegations of the Second Amended Cross Claim in the Mandel Lawsuit.

<p>ATTORNEY OR PARTY WITHOUT ATTORNEY (Name, State Bar number, and address): Craig J. Mariam, SBN: 225280 / John P. Cogger, SBN: 172808 Gordon Rees Scully Mansuhkani, LLP 633 West Broadway, 52nd Floor Los Angeles, CA 90071 TELEPHONE NO.: 213-576-5000 FAX NO.: 877-306-0043 E-MAIL ADDRESS: cmariam@grsm.com/jcogger@grsm.com ATTORNEY FOR (Name): Petitioner Amber Heard</p>	<p>FOR COURT USE ONLY</p>
<p>Court for county in which discovery is to be conducted: SUPERIOR COURT OF CALIFORNIA, COUNTY OF Los Angeles STREET ADDRESS: 111 North Hill Street MAILING ADDRESS: CITY, STATE, AND ZIP CODE: Los Angeles, 90012 BRANCH NAME: Central District</p>	
<p>Court in which action is pending: Name of Court: In the Circuit Court of Fairfax, Virginia STREET ADDRESS: 4110 Chain Bridge Road MAILING ADDRESS: CITY, STATE, AND ZIP CODE: Fairfax, VA 22030-4009 COUNTRY: USA</p>	
<p>PLAINTIFF/PETITIONER: John C. Depp II DEFENDANT/RESPONDENT: Amber Laura Heard</p>	<p>CALIFORNIA CASE NUMBER (if any assigned by court): 19STCP04763</p>
<p align="center">SUBPOENA FOR PRODUCTION OF BUSINESS RECORDS IN ACTION PENDING OUTSIDE CALIFORNIA</p>	<p>CASE NUMBER (of action pending outside California): CL-2019-0002911</p>

THE PEOPLE OF THE STATE OF CALIFORNIA, TO (name, address, and telephone number of deponent, if known):
 Custodian of Records of The Mandel Company, Inc., 8383 Wilshire Blvd., Suite 400, Beverly Hills, CA 90211

1. YOU ARE ORDERED TO PRODUCE THE BUSINESS RECORDS described in item 3, as follows:

<p>To (name of deposition officer): Gordon Rees On (date): September 11, 2020 At (time): 9:00am Location (address): 633 West Fifth Street, 52nd Floor, Los Angeles, CA 90071</p> <p align="center">Do not release the requested records to the deposition officer prior to the date and time stated above.</p>
--

- a. by delivering a true, legible, and durable copy of the business records described in item 3, enclosed in a sealed inner wrapper with the title and number of the action, name of witness, and date of subpoena clearly written on it. The inner wrapper shall then be enclosed in an outer envelope or wrapper, sealed, and mailed to the deposition officer at the address in item 1.
 - b. by delivering a true, legible, and durable copy of the business records described in item 3 to the deposition officer at the witness's address, on receipt of payment in cash or by check of the reasonable costs of preparing the copy, as determined under Evidence Code section 1563(b).
 - c. by making the original business records described in item 3 available for inspection at your business address by the attorney's representative and permitting copying at your business address under reasonable conditions during normal business hours.
2. The records are to be produced by the date and time shown in item 1 (but not sooner than 20 days after the issuance of the deposition subpoena, or 15 days after service, whichever date is later). Reasonable costs of locating records, making them available or copying them, and postage, if any, are recoverable as set forth in Evidence Code section 1563(b). The records must be accompanied by an affidavit of the custodian or other qualified witness pursuant to Evidence Code section 1561.
3. The records to be produced are described as follows (if electronically stored information is demanded, the form or forms in which each type of information is to be produced may be specified): PLEASE SEE ATTACHMENT
- Continued on Attachment 3 (use form MC-025).
4. Attorneys of record in this action or parties without attorneys are (name, address, telephone number, and name of party represented): PLEASE SEE ATTACHED
- Continued on Attachment 4 (use form MC-025).

PLAINTIFF/PETITIONER: JOHN C DEPP, II	CASE NUMBER (of action pending outside California): 19STCP04763
DEFENDANT/RESPONDENT: AMBER LAURA HEARD	

5. If you have been served with this subpoena as a custodian of consumer or employee records under Code of Civil Procedure section 1985.6 and a motion to quash or an objection has been served on you, a court order or agreement of the parties, witnesses, and consumer or employee affected must be obtained before you are required to produce consumer or employee records.

6. Other terms or provisions from out-of-state subpoena, if any (specify):
PLEASE SEE ATTACHED

Continued on Attachment 6 (use form MC-025).

DISOBEDIENCE OF THIS SUBPOENA MAY BE PUNISHED AS CONTEMPT BY THIS COURT. YOU WILL ALSO BE LIABLE FOR THE SUM OF \$500 AND ALL DAMAGES RESULTING FROM YOUR FAILURE TO OBEY.

Date issued:

Craig J. Mariam _____
(TYPE OR PRINT NAME)

(SIGNATURE OF PERSON ISSUING SUBPOENA)

Attorney for Petitioner Amber Heard _____
(TITLE)

PROOF OF SERVICE OF SUBPOENA FOR PRODUCTION OF BUSINESS RECORDS

1. I served this Subpoena for Production of Business Records In Action Pending Outside California by personally delivering a copy to the person served as follows:

- a. Person served (name):
- b. Address where served:

c. Date of delivery: _____ d. Time of delivery: _____

e. Witness fees and mileage both ways (check one):

(1) were paid. Amount:..... \$ _____

(2) were not paid.

(3) were tendered to the witness's public entity employer as required by Government Code section 68097.2. The amount tendered was (specify): \$ _____

f. Fee for service:..... \$ _____

2. I received this subpoena for service on (date):

3. I also served a completed Proof of Service of Notice to Consumer or Employee and Objection (form SUBP-025) by personally delivering a copy to the person served as described in 1 above.

4. Person serving:

- a. Not a registered California process server
- b. California sheriff or marshal
- c. Registered California process server
- d. Employee or independent contractor of a registered California process server
- e. Exempt from registration under Business and Professions Code section 22350(b)
- f. Registered professional photocopier
- g. Exempt from registration under Business and Professions Code section 22451
- h. Name, address, telephone number, and, if applicable, county of registration and number:

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

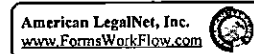
Date: _____

(SIGNATURE)

(For California sheriff or marshal use only)
I certify that the foregoing is true and correct.

Date: _____

(SIGNATURE)



SHORT TITLE: John C. Depp, II v. Amber Laura Heard	CASE NUMBER: CL-2019-0002911
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ATTACHMENT (Number): 3

(This Attachment may be used with any Judicial Council form.)

DEFINITIONS, INSTRUCTIONS AND DOCUMENTS TO BE PRODUCED
SEE ATTACHED

(If the item that this Attachment concerns is made under penalty of perjury, all statements in this Attachment are made under penalty of perjury.)

Page _____ of _____
(Add pages as required)

ATTACHMENT

John C. Depp, II v. Amber Laura Heard Fairfax County Circuit Court: CL 2019-0002911

DEFINITIONS

- a. **Action.** The term "Action" means the above-captioned action.
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- f. **Correspondence.** The term "correspondence" means any document(s) and/or communication(s) sent to or received from another entity and/or person.
- g. **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 all persons acting on her behalf.
- h. **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, audio or video recordings, 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.

l. **Engaged.** The term "Engaged," in relation to a person (as defined herein), means contracted, directed, hired, retained, formed an agreement with (whether formal or informal, binding or nonbinding, written or oral), and/or procured the services of, whether or not in exchange for remuneration or other valuable consideration.

j. **Including.** The term "including" means including but not limited to.

k. **The Mandel Lawsuit.** The term means the litigation entitled John C. Depp, II, et al. v. The Mandel Company, Inc., et al., Case No. BC 646882.

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

l. **Performance.** The term "Performance," in relation to Mr. Depp, means any creative work in which Mr. Depp or his likeness is, was, will be, may be, or is contemplated to appear, whether or not in exchange for payment or other benefit to Mr. Depp, and includes (without limitation) any appearance (or potential appearance) by Mr. Depp in any film, TV series, product endorsement, advertisement, musical performance, or in-person appearance. To avoid doubt, a Performance includes any creative work in which it was contemplated that Mr. Depp or his likeness would be featured, even if the work was ultimately created without Mr. Depp or his likeness appearing.

m. **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 both individually or as entities.

n. **Requests.** The term "Requests" shall mean the requests for documents to be produced under this Subpoena as set forth in this Attachment.

o. **You and/or Your.** The terms "You" and/or "Your" refer to the recipient of this Subpoena, as well as all persons and entities over which said recipient has "control" as understood by the Rules of this Court.

INSTRUCTIONS

1. Where information in Your possession is requested, such request includes non- privileged information in the possession of Your agent(s), employee(s), assign(s), representative(s), and all others acting on Your behalf.
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3. 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.
4. 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.
5. If You perceive any ambiguities in a question, instruction, definition, or other aspect of this Subpoena, set forth the matter deemed ambiguous and the construction used in answering.
6. 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 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.
7. 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 as to permit an informed ruling on the objection.
8. These Requests are continuing in character so as to require You to promptly amend or supplement Your production of documents within a reasonable time if You obtain or become aware of any further documents responsive to this Subpoena.

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2. Copies of all discovery pleadings exchanged between the parties in the Mandel Lawsuit.
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5. Copies of all documents reflecting Mr. Depp's claims that he was essentially bankrupt as a result of Your actions and inactions.
6. Copies of all depositions, including videos, and all transcripts of any proceedings in the Mandel Lawsuit.
7. Copies of all documents relating to Ms. Heard.
8. Copies of all documents relating in any manner to Mr. Depp's use of drugs or alcohol, including but not limited to the types, amount and any payment for drugs and alcohol, or consequences for drug and/or alcohol use by Mr. Depp.
9. Copies of all documents relating in any manner to Mr. Depp engaging in any destruction of property, including any photographs, videos, audio recordings, invoices or payments to any individual or entity for repairs, replacements or to otherwise compensate for damage;
10. Copies of all documents relating in any manner to Mr. Depp engaging in violence of any nature, including any person or property. This includes the type of violence, upon whom or what inflicted, any evidence of the damages, any medical records or other documentations, any photographs, videos or audio recordings, and any payments made as a result of such violence.
11. All documents relating in any manner to efforts by Mr. Depp to obtain a prenuptial or postnuptial agreement with Ms. Heard.
12. All documents reflecting any study or examination of trends in Mr. Depp's career successes or failures, including any projections of income over any period of time.
13. All documents reflecting Mr. Depp being aware of his financial condition during the period December 1, 2015 through and including May 30, 2016.
14. All documents supporting or otherwise relating to the allegations of the Second Amended Cross Claim in the Mandel Lawsuit.

SHORT TITLE: John C. Depp, II v. Amber Laura Heard	CASE NUMBER: CL-2019-0002911
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ATTACHMENT (Number): 4

(This Attachment may be used with any Judicial Council form.)

COUNSEL OF RECORD

(If the item that this Attachment concerns is made under penalty of perjury, all statements in this Attachment are made under penalty of perjury.)

Page _____ of _____
(Add pages as required)

VIRGINIA:

IN THE CIRCUIT COURT OF FAIRFAX COUNTY

JOHN C. DEPP, II,

Plaintiff,

v.

AMBER LAURA HEARD,

Defendant.

Civil Action No.: CL-2019-0002911

COUNSEL OF RECORD FOR ALL PARTIES

<p>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 <i>Counsel for Plaintiff John C. Depp, II</i></p>	<p>Camille M. Vasquez (admitted <i>pro hac vice</i>) BROWN RUDNICK LLP 2211 Michelson Drive Irvine, CA 92612 Telephone: (949) 752-7100 Facsimile: (949) 252-1514 cvasquez@brownrudnick.com <i>Counsel for Plaintiff John C. Depp, II</i></p>
	<p>Adam R. Waldman THE ENDEAVOR LAW FIRM, P.C. 1775 Pennsylvania Avenue, N.W., Suite 350 Washington, DC 20006 awaldman@theendevorgroup.com <i>Counsel for Plaintiff John C. Depp, II</i></p>
<p>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 <i>Counsel for Defendant Amber Laura Heard</i></p>	<p>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 <i>Counsel for Defendant Amber Laura Heard</i></p>

SHORT TITLE: John C. Depp, II v. Amber Laura Heard	CASE NUMBER: CL-2019-0002911
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ATTACHMENT (Number): 6

(This Attachment may be used with any Judicial Council form.)

CERTIFICATE OF COUNSEL

(If the item that this Attachment concerns is made under penalty of perjury, all statements in this Attachment are made under penalty of perjury.)

Page ____ of ____
(Add pages as required)

VIRGINIA:

IN THE CIRCUIT COURT OF FAIRFAX COUNTY

JOHN C. DEPP, II,

Plaintiff,

v.

AMBER LAURA HEARD,

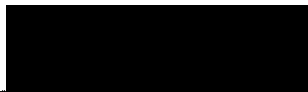
Defendant.

Civil Action No.: CL-2019-0002911

CERTIFICATE OF COUNSEL

This is to certify that I caused a true and accurate copy of the enclosed Subpoena for Production of Business Records in Action Pending Outside California to be sent by email this 17th day of August, 2020.

August 17, 2020


Elaine Charlson Bredenhof (VSB No. 23766)
Adam S. Nadelhaft (VSB No. 91717)
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Counsel to Defendant Amber Laura Heard

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing was served this 17th day of August 2020, by email, by agreement of the parties, addressed as follows:

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DAVID E. MURPHY◊◊

ALSO ADMITTED IN D.C.
◻ ALSO ADMITTED IN MARYLAND
◊ ALSO ADMITTED IN MASSACHUSETTS
% ALSO ADMITTED IN NEW YORK
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• ONLY ADMITTED IN MARYLAND

August 17, 2020

BY MESSENGER

John T. Frey, Clerk
Fairfax County Circuit Court
4110 Chain Bridge Road, 3rd Floor
Fairfax, VA 22030

FILED
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2020 AUG 17 PM 2:58
JOHN T. FREY
CLERK, CIRCUIT COURT
FAIRFAX, VA

Re: *Case No. CL-2019-0002911 – John C. Depp, II v. Amber Laura Heard*

Dear Mr. Frey:

Enclosed for filing in the above referenced matter, please find four copies of Defendant's Certificate of Counsel and corresponding subpoenas issued pursuant to Virginia Code Section 8.01-412.10, and California Civil Procedure Code Section 2029.100 (collectively, "Acts"). The enclosed Subpoenas for Production of Business Records in Action Pending Outside California, Subpoenas Duces Tecum to Person Under Foreign Subpoena, and Deposition Subpoena for Personal Appearance in Action Pending Outside California have been issued in accordance with both Acts and the reciprocal privileges included therein.

The enclosed documents will be served by private process server, and affidavits of service will be filed as necessary. Please file these documents with the Court's papers in this case and return file stamped copies of the same via the awaiting messenger.

Thank you very much for your assistance.

Very truly yours,

Elaine Charlson Bredehoff

Enclosures