

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>Laura Divenere c/o Lee A. Sherman, Esq.</u>	
ADDRESS: <u>2601 Main Street, Suite 900</u> <u>Irvine, CA 92614</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

LAURA DIVENERE c/o Lee A. Sherman, Esq.

NAME

2601 Main Street, Suite 900

STREET ADDRESS

Irvine CA 92614  
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

at Remote Via Zoom Per Judicial Council of California Emergency Rule 11 at December 10, 2020 at 9:00am PST  
LOCATION DATE AND TIME

and to permit inspection and copying by the requesting party or someone acting in his or her half 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 Bredehoft Cohen & Brown, P.C., 11260 Roger Bacon Drive, Suite 201  
STREET ADDRESS

Reston VA 20190 703 318 6800  
CITY STATE ZIP TELEPHONE NUMBER

FILED  
CIVIL INTAKE  
2020 NOV -4 PM 2:32  
JOHN T. REYBERT  
CLERK, CIRCUIT COURT  
FAIRFAX, VA

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.

November 10<sup>th</sup>, 2020  
DATE ISSUED

**JOHN T. FREY, CLERK**

by



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 <a href="mailto:bchew@brownrudnick.com">bchew@brownrudnick.com</a> <a href="mailto:acrawford@brownrudnick.com">acrawford@brownrudnick.com</a> <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 <a href="mailto:cvasquez@brownrudnick.com">cvasquez@brownrudnick.com</a> <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 &amp; Brown, P.C. 11260 Roger Bacon Drive, Suite 201 Reston, Virginia 20190 Telephone: (703) 318-6800 <a href="mailto:ebredehoft@cbcblaw.com">ebredehoft@cbcblaw.com</a> <a href="mailto:anadelhaft@cbcblaw.com">anadelhaft@cbcblaw.com</a> <a href="mailto:dmurphy@cbcblaw.com">dmurphy@cbcblaw.com</a> <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 <a href="mailto:broddenborn@woodsrogers.com">broddenborn@woodsrogers.com</a> <a href="mailto:jtreece@woodsrogers.com">jtreece@woodsrogers.com</a> <i>Counsel for Defendant Amber Laura Heard</i></p>

ATTORNEY OR PARTY WITHOUT ATTORNEY (Name, State Bar number, and address): <b>Craig J. Mariam (SBN 225280) John P. Cogger (SBN 172808)</b> <b>GORDON REES SCULLY MANSUKHANI, LLP</b> <b>633 West Fifth Street, 52<sup>nd</sup> Floor</b> <b>Los Angeles, CA 90071</b> TELEPHONE NO.: 213.576.5000 FAX NO. (Optional): E-MAIL ADDRESS (Optional): cmariam@grsm.com; jcogger@grsm.com ATTORNEY FOR (Name): <b>AMBER LAURA HEARD</b>	<b>FOR COURT USE ONLY</b>
Court for county in which discovery is to be conducted: <b>SUPERIOR COURT OF CALIFORNIA, COUNTY OF Los Angeles</b> STREET ADDRESS: 111 N. Hill Street MAILING ADDRESS: 111 N. Hill Street CITY AND ZIP CODE: Los Angeles, CA 90012 BRANCH NAME: Stanley Mosk Courthouse	
Court in which action is pending: <b>Name of Court: Circuit Court of Fairfax County</b> STREET ADDRESS: 4110 Chain Bridge Road MAILING ADDRESS: 4110 Chain Bridge Road CITY, STATE, AND ZIP CODE: Fairfax, VA 22030 COUNTRY: United States of America	
PLAINTIFF/PETITIONER: John C. Depp, II DEFENDANT/RESPONDENT: Amber Laura Heard	CALIFORNIA CASE NUMBER (if any assigned by court): <b>19STCP04763</b>
<b>DEPOSITION SUBPOENA FOR PERSONAL APPEARANCE          IN ACTION PENDING OUTSIDE CALIFORNIA</b>	CASE NUMBER (of action pending outside California): <b>CL-2019-0002911</b>

THE PEOPLE OF THE STATE OF CALIFORNIA, TO (name, address, and telephone number of deponent, if known):  
 LAURA DIVENERE c/o Lee A. Sherman, Esq., 2601 Main Stret, Suite 900, Irvine, CA 92614

1. YOU ARE ORDERED TO APPEAR IN PERSON TO TESTIFY AS A WITNESS in the action specified above at the following date, time, and place:

Date: December 10, 2020	Time: 9:00 AM	Address: Remote Via Zoom Per Judicial Council of California Emergency Rule 11
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- a.  As a deponent who is not a natural person, you are ordered to designate one or more persons to testify on your behalf as to the matters described in item 2. (Code Civ. Proc., § 2025.230.)
- b. This deposition will be recorded stenographically  through the instant visual display of testimony and by  audiotape  videotape.
2.  If the witness is a representative of a business or other entity, the matters upon which the witness is to be examined are as follows:

Continued on Attachment 2 (use form MC-025).

3. Attorneys of record in this action or parties without attorneys are (name, address, telephone number, and name of party represented):  
 See Attachment 3

Continued on Attachment 3 (use form MC-025).

**DEPOSITION SUBPOENA FOR PERSONAL APPEARANCE  
IN ACTION PENDING OUTSIDE CALIFORNIA**

PLAINTIFF/PETITIONER: John C. Depp, II, DEFENDANT/RESPONDENT: Amber Laura Heard.	CASE NUMBER (of action pending outside California): 19STCP04763C
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4.  Other terms or provisions from out-of-state subpoena, if any (specify):

Continued on Attachment 4 (use form MC-025).

5. At the deposition, you will be asked questions under oath. Questions and answers are recorded stenographically at the deposition; later they are transcribed for possible use at trial. You may read the written record and change any incorrect answers before you sign the deposition. You are entitled to receive witness fees and mileage actually traveled both ways. The money must be paid, at the option of the party giving notice of the deposition, either with service of this subpoena or at the time of the deposition. Unless the court orders or you agree otherwise, if you are being deposed as an individual, the deposition must take place within 75 miles of your residence. The location of the deposition for all deponents is governed by Code of Civil Procedure section 2025.250.

**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: 2020-11-04

Craig J. Mariam, Esq.

(TYPE OR PRINT NAME)

(SIGNATURE OF PERSON ISSUING SUBPOENA)

Attorney for Amber Laura Heard

(TITLE)

**PROOF OF SERVICE OF DEPOSITION SUBPOENA FOR PERSONAL APPEARANCE**

1. I served this Deposition Subpoena for Personal Appearance in Action Pending Outside California by personally delivering a copy to the person served as follows:

- a. Person served
- 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. 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. 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.

(SIGNATURE)

Date:

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

Date:

▲  
\_\_\_\_\_  
(SIGNATURE)



SHORT TITLE: Depp v. Heard	CASE NUMBER: CL-2019-0002911 .
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ATTACHMENT (Number): 3

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

See Attachment 3- Service List.

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

*(Add pages as required)*

**SERVICE LIST**

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

<p>Benjamin G. Chew, Esq. Elliot J. Weingarten, Esq. Andrew C. Crawford, Esq. BROWN RUDNICK LLP 601 Thirteenth Street, N.W. Washington, D.C. 20005 Tel: 202-536-1700; Fax: 202-536-1701 <a href="mailto:bchew@brownrudnick.com">bchew@brownrudnick.com</a> <a href="mailto:eweingarten@brownrudnick.com">eweingarten@brownrudnick.com</a> <a href="mailto:acrawford@brownrudnick.com">acrawford@brownrudnick.com</a></p> <p>Camille M. Vasquez, Esq. Leo J. Preciado, Esq. Ronald Rus, Esq. Samuel A. Moniz, Esq. BROWN RUDNICK LLP 2211 Michelson Drive Irvine, CA 92612 Tel: 949-752-7100; Fax 949-252-1514 <a href="mailto:cvasquez@brownrudnick.com">cvasquez@brownrudnick.com</a> <a href="mailto:lpresiado@brownrudnick.com">lpresiado@brownrudnick.com</a> <a href="mailto:rrus@brownrudnick.com">rrus@brownrudnick.com</a> <a href="mailto:smoniz@brownrudnick.com">smoniz@brownrudnick.com</a></p> <p>Robert Gilmore, Esq. Kevin Attridge, Esq. STEIN MITCHELL BEATO &amp; MISSNER LLP 901 Fifteenth Street, N.W., Suite 700 Washington, D.C. 20005 Tel: 202-601-1589; Fax: 202-296-8312 <a href="mailto:rgilmore@steinmitchell.com">rgilmore@steinmitchell.com</a> <a href="mailto:kattridge@steinmitchell.com">kattridge@steinmitchell.com</a></p>	<p><i>Attorneys for Plaintiff JOHN C. DEPP, II</i></p>
<p>J. Benjamin Rottenborn, Esq. Joshua R. Treece, Esq. WOODS ROGERS PLC 10. S Jefferson Street, Suite 1400 P.O. Box 14125 Roanoke, Virginia 24011 Tel: 540-983-7540 Email: <a href="mailto:broddenborn@woodsrogers.com">broddenborn@woodsrogers.com</a> <a href="mailto:jtreece@woodsrogers.com">jtreece@woodsrogers.com</a></p>	<p><i>Attorneys for Defendant Amber Heard</i></p>
<p>Elaine Charlson Brèdehoft, Esq. Carla D. Brown, Esq. Adam S. Nadelhaft, Esq. David E. Murphy, Esq. Charlson Brèdehoft Cohen &amp; Brown, P.C.</p>	<p><i>Attorneys for Defendant Amber Heard</i></p>

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11260 Roger Bacon Drive, Suite 201 Reston, VA 20190 Tel: 703-318-6800 Mobile: 703-919-2735 Fax: 703-318-6808 Email: <a href="mailto:ebredehft@charlsonbredehft.com">ebredehft@charlsonbredehft.com</a> <a href="mailto:cbrown@cbcblaw.com">cbrown@cbcblaw.com</a> <a href="mailto:anadelhaft@cbcblaw.com">anadelhaft@cbcblaw.com</a> <a href="mailto:dmurphy@cbcblaw.com">dmurphy@cbcblaw.com</a>	
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SHORT TITLE: Depp v. Heard	CASE NUMBER: CL-2019-0002911 .
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ATTACHMENT (Number): 4

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

Due to the ongoing COVID-19 pandemic, the deposition will be taken by audio-video conference, via a link to be provided, pursuant to Code of Civil Procedure §§ 2025.220 and 2025.330. If requested, the deponent need not be physically present with the deposition officer at the time of the deposition. (Judicial Council of California Emergency Rule 11 [April 6, 2020].) Counsel for all parties and their clients will be able to participate from various separate locations. This deposition will be taken before a certified shorthand reporter who is authorized to administer an oath in accordance with the provisions of California Code of Civil Procedure § 2025.010, et seq.

The deposition may also be videotaped and audiotaped for use as evidence in this action, at trial, or for such other purposes as are permitted, as authorized by Code of Civil Procedure § 2025.340 and any applicable Virginia law.

The deposition testimony may also be recorded through Summation, an instant visual display of the testimony, of which a rough draft of the testimony will be requested, as authorized by Code of Civil Procedure § 2025.340.

If the deposition is not completed on the date set forth above, the taking of the deposition will be continued from day to day thereafter, except for Saturdays, Sundays and holidays, until completed.

*(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 2 of 3

*(Add pages as required)*

VIRGINIA:

IN THE CIRCUIT COURT OF FAIRFAX COUNTY

JOHN C. DEPP, II,

Plaintiff,

v.

AMBER LAURA HEARD,

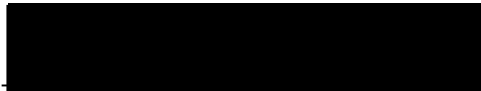
Defendant.

Civil Action No.: CL-2019-0002911

CERTIFICATE OF COUNSEL

This is to certify that I caused a true and accurate copy of the enclosed Deposition Subpoena for Personal Appearance in Action Pending Outside California to be sent by email this 4<sup>th</sup> day of November, 2020.

November 4, 2020

  
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](mailto:ebredehoft@cbcblaw.com)  
[anadelhaft@cbcblaw.com](mailto:anadelhaft@cbcblaw.com)  
[dmurphy@cbcblaw.com](mailto: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](mailto:brottenborn@woodsrogers.com)  
[jtreece@woodsrogers.com](mailto:jtreece@woodsrogers.com)  
*Counsel to Defendant Amber Laura Heard*

**CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of the foregoing was served this 4<sup>th</sup> Day of November, by email, by agreement of the parties, addressed 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](mailto:bchew@brownrudnick.com)  
[acrawford@brownrudnick.com](mailto: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](mailto:cvasquez@brownrudnick.com)

*Counsel for Plaintiff John C. Depp, II*

  
Elaine Charlson Bredehoff (VSB No. 23766)

CHARLSON BREDEHOFT COHEN & BROWN, P.C.

ATTORNEYS AND COUNSELORS AT LAW

CURTIS L. CHARLSON (1925-2010)  
ELAINE CHARLSON BREDEHOFT◊  
PETER C. COHEN◊  
CARLA D. BROWN◊□  
ADAM S. NADELHAFT◊%

KATHLEEN Z. QUILL◊♦  
DAPHNE S. GEBAUER◊  
YVONNE A. MILLER•  
DAVID E. MURPHY◊◊

◊ALSO ADMITTED IN D.C.  
□ ALSO ADMITTED IN MARYLAND  
♦ALSO ADMITTED IN MASSACHUSETTS  
% ALSO ADMITTED IN NEW YORK  
◊ ALSO ADMITTED IN WISCONSIN  
•ONLY ADMITTED IN MARYLAND

November 4, 2020

FILED  
CIVIL INTAKE  
2020 NOV -4 PM 2:51  
JOHN T. FREY  
CLERK, CIRCUIT COURT  
FAIRFAX, VA

**BY MESSENGER**

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

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 subpoena issued pursuant to Virginia Code Section 8.01-412.10, and California Civil Procedure Code Section 2029.100 (collectively, "Acts"). The enclosed Subpoena for Production of Business Records in Action Pending Outside California and Subpoenas Duces Tecum to Person Under Foreign Subpoena have been issued in accordance with both Acts and the reciprocal privileges included therein.

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

Thank you very much for your assistance.

Very truly yours,

  
Elaine Charlson Bredehoft

Enclosures