

CL-2019-2911

[] 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: Stephen Deuters c/o Infinitum Nihil, Inc.	
ADDRESS: 21700 Oxnard Street, Ste. 400 Woodland Hills, California 91367	
<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. CL2019-0002911

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

Fairfax County

Circuit Court

4110 Chain Bridge Road, Fairfax, Virginia 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

Stephen Deuters

NAME

c/o Infinitum Nihil, Inc., 21700 Oxnard Street, Ste. 400

STREET ADDRESS

Woodland Hills

California

91367

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

See Exhibit A

First Legal Records Retrieval
at 1511 West Beverly Blvd., Los Angeles, CA 90026

LOCATION

at January 13, 2020 at 10:00 a.m.

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

Amber Laura Heard

NAME OF REQUESTING PARTY

c/o Ben Rottenborn, Esq., Woods Rogers, PLC, 10 S. Jefferson Street, Ste. 1400

STREET ADDRESS

Roanoke

Virginia

24011

(540) 983-7540

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.

January 3rd, 2020
DATE ISSUED

JOHN T. FREY, CLERK

by



DEPUTY CLERK

J. Benjamin Rottenborn

84796

Virginia

NAME OF ATTORNEY FOR REQUESTING PARTY

BAR NUMBER

LICENSING STATE

Woods Rogers PLC, 10 S. Jefferson St.

(540) 983-7540

TELEPHONE NUMBER OF ATTORNEY

OFFICE ADDRESS

Suite 1400, Roanoke, Virginia 24011

(540) 983-7711

FACSIMILE NUMBER OF ATTORNEY

OFFICE ADDRESS

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)

All Counsel of Record

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jfink@kaplanhecker.com
jquinn@kaplanhecker.com

Counsel for Amber Laura Heard

EXHIBIT A

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, 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 the 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, 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.

i. **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. **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.

n. ***Relevant Date Range.*** A Relevant Date Range is any of the following date ranges (inclusive of the first and last day of each range):

- i. 08/01/2012 – 05/01/2013
- ii. 03/07/2013 – 03/21/2013
- iii. 05/24/2014 – 07/31/2014
- iv. 08/01/2014 – 09/07/2014
- v. 12/01/2014 – 12/31/2014
- vi. 01/20/2015 – 02/14/2015
- vii. 03/03/2015 – 04/21/2015
- viii. 03/21/2015 – 04/11/2015
- ix. 08/01/2015 – 09/15/2015
- x. 11/25/2015 – 12/13/2015
- xi. 12/01/2015 – 01/14/2016
- xii. 04/01/2016 – 05/20/2016

xiii. 05/21/2016 – 06/21/2016

xiv. 07/01/2016 – 08/01/2016

o. **Relevant Entity.** A “Relevant Entity” is any of the following:

A Contrario	JDSV Holdings, Inc.	SCI La Pierre Investment Trust
Brave Pictures, Inc.	John C. Depp II Insurance Trust	Stratton Films, Inc.
Contre Courant	John C. Depp II Living Trust	Swag LLC
Elisa’s Attic LLC	Junior Varsity Productions LLC	Sweetzer Trust, LLC
Gelt Valleyview Holdings LLC	L.R.D. Productions, Inc.	The Depp Irrevocable Trust
HST Archives, LLC	Le Hameau du Bebe, LLC	The Mooh Investment Trust
Infinitum Nihil Media, LLC	Matar II LLC	Unison Music Group
Infinitum Nihil Music, LLC	Matar LLC	Vajoliroja, LLC
Infinitum Nihil Publishing, LLC	P Music Group, LLC	Versailles Road Trust
Infinitum Nihil Records, LLC	Plus Capital Management, LLC	6909 Ventures LLC
Infinitum Nihil, Inc.	Scaramanga Bros., Inc.	
JDM Ventures, LLC	SCI La Pierre	

p. **Relevant Individual.** A “Relevant Individual” is any of the following individuals:

Eugene Arreola	Josh Drew	Kevin Murphy
Isaac Baruch	Trinity Esparza	Brandon Patterson
Robin Baum	Brad Furman	C.J. Roberts
Lisa Beane	Jason Gonet	Tara Roberts
Sean Bett	Tyler Hadden	Alejandro Romero
Paul Bettany	Cornelius Harrell	Melissa Saenz
Erin Falati (formerly Boerum)	Nathan Holmes	Trudy Salven
Malcolm Connolly	Jerry Judge	Miguel Sanchez
Dr. Connell Cowan	Ben King	Sam Sarkar
Bobby de Leon	Dr. David Kipper	Doug Stanhope
Elisa "Christi" Dembrowski	Damien Leonard	Norman Todd
Leonard Damian	Debbie Lloyd	Bruce Witkin
Gina Deuters	Joel Mandel	Keenan Wyatt
Stephen Deuters	Samantha McMillen	
Laura Divenere	Andrew Milner	

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

r. **Romantic Partners.** The term "Romantic Partners" shall mean any persons You know to have been in a romantic or sexually intimate relationship with Mr. Depp.

s. **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. All documents and/or communications with Mr. Depp that refer or relate to Ms. Heard.
2. All documents and/or communications with Ms. Heard that refer or relate to Mr. Depp.
3. All documents and/or communications concerning the relationship between Mr. Depp and Ms. Heard.
4. All documents and/or communications with Mr. Depp, Ms. Heard, or any Relevant Individual within a Relevant Date Range.
5. All documents and/or communications concerning any act or alleged act of physical violence and/or abuse involving Mr. Depp and any person (whether or not Mr. Depp himself was violent and/or abusive).

6. All documents and/or communications concerning any act or alleged act of Mr. Depp that resulted in damage to property.
7. All documents and/or communications concerning any use or alleged use of drugs (whether legal or illegal) and/or alcohol by Mr. Depp.
8. All documents and/or communications concerning any of Mr. Depp's Romantic Partners (other than Ms. Heard) concerning any act or alleged act of physical violence and/or abuse involving Mr. Depp (whether or not Mr. Depp himself was violent and/or abusive); any act or alleged act of Mr. Depp that resulted in damage to property; or any use or alleged use of drugs (whether legal or illegal) and/or alcohol by Mr. Depp.
9. All documents and/or communications concerning Mr. Depp's emotional, mental, or psychological condition or state, including but not limited to any erratic behavior, expressions of anger or rage, confusion, memory loss, delusions, and/or detachment from reality.
10. All documents and/or communications concerning any injury that Mr. Depp suffered to his hand(s) and/or finger(s) in Australia in or around March 2015.
11. All documents and/or communications concerning a flight from Boston on or around May 24, 2014.
12. All documents and/or communications concerning any statement by You to TMZ in relation to the article "Johnny Depp Assistant Says Texts Were Doctored," dated June 2, 2016 (*see <https://www.tMZ.com/2016/06/02/johnny-depp-assistant-denies-text-messages-amber-heard/>*).
13. Copies of any contracts, agreements, and/or understandings, whether formal or informal, entered into between You on the one hand, and Mr. Depp, any person or entity acting on Mr. Depp's behalf or Engaged by Mr. Depp, and/or any Relevant Individual, on the other.

14. All guidelines, instructions, directions, requests, or demands, whether formal or informal, provided to You in connection with (a) Your Engagement for Mr. Depp or (b) any actions You took on behalf of Mr. Depp or at the direction or request of Mr. Depp or any person or entity acting on Mr. Depp's behalf.

15. All documents and/or communications concerning any guidelines, instructions, directions, requests, or demands, whether formal or informal, written or oral relating to any person Engaged to provide security and/or personal protection services for Mr. Depp.

16. All documents and/or communications concerning any payments, gifts, or transfers of value of any kind, whether in monetary form or otherwise, from Mr. Depp (and/or any entity or person affiliated or associated with Mr. Depp or acting on his behalf) to or for the benefit of You (and/or any entity or person affiliated or associated with You or acting on Your behalf).

17. All documents and/or communications concerning any transactions, payments, gifts, or transfers of value of any kind, whether in monetary form or otherwise, made by You (and/or any entity or person affiliated or associated with You or acting on Your behalf) to or for the benefit of any Relevant Individual (and/or any entity or person affiliated or associated with any Relevant Individual or acting on behalf of a Relevant Individual).

18. All documents and/or communications concerning any transactions, payments, gifts, or transfers of value of any kind, whether in monetary form or otherwise, relating to any act or alleged act of physical violence and/or abuse by Mr. Depp.

19. All documents and/or communications concerning any transactions, payments, gifts, or transfers of value of any kind, whether in monetary form or otherwise, relating to any act or alleged act of Mr. Depp that resulted in damage to property.

20. All documents and/or communications within any Relevant Date Range concerning the provision of cleaning, housekeeping, restoration, repair, remediation, or maintenance and/or other domestic services in relation to any property owned or used by Mr. Depp (including any hotel, rental house, apartment, suite, or other accommodation).

21. All documents and/or communications concerning any testimony or statement, whether oral or written and whether in draft or final form, in relation to this Action and/or any other lawsuit or proceeding involving or relating to Mr. Depp.

* * *

ATTORNEY OR PARTY WITHOUT ATTORNEY (Name, State Bar number, and address): Davida Brook (SBN 275370) Susman Godfrey L.L.P. 1900 Avenue of the Stars, Suite 1400, Los Angeles, CA 90067 TELEPHONE NO.: 310-789-3100 FAX NO.: E-MAIL ADDRESS: dbrook@susmangodfrey.com ATTORNEY FOR (Name): Defendant AMBER LAURA HEARD	FOR COURT USE ONLY
Court for county in which discovery is to be conducted: SUPERIOR COURT OF CALIFORNIA, COUNTY OF Los Angeles STREET ADDRESS: 111 N. Hill Street MAILING ADDRESS: 111 N. Hill Street CITY, STATE, AND ZIP CODE: Los Angeles, CA 90012 BRANCH NAME: Central District	
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: United States	
PLAINTIFF/PETITIONER: JOHN C. DEPP, II DEFENDANT/RESPONDENT: AMBER LAURA HEARD	CALIFORNIA CASE NUMBER (if any assigned by court):
SUBPOENA FOR PRODUCTION OF BUSINESS RECORDS IN ACTION PENDING OUTSIDE CALIFORNIA	CASE NUMBER (of action pending outside California): CL-2019-0002911

THE PEOPLE OF THE STATE OF CALIFORNIA, TO (name, address, and telephone number of deponent, if known):
 Stephen Deuters, c/o Infinitum Nihil, Inc., 21700 Oxnard Street, Ste. 400, Woodland Hills, CA 91367

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

To (name of deposition officer): First Legal Records Retrieval On (date): 1/13/2020 At (time): 10:00 AM Location (address): 1511 Beverly Blvd, Los Angeles, CA 90026
Do not release the requested records to the deposition officer prior to the date and time stated above.

- 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):
See Attachment 3
 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): **See Attachment 4**

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

PLAINTIFF/PETITIONER: JOHN C. DEPP, II	CASE NUMBER (of action pending outside California):
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):

See Attachment 6

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: 12/19/2019

David Brook

(TYPE OR PRINT NAME)



(SIGNATURE OF PERSON ISSUING SUBPOENA)

Attorney for Defendant Amber Laura 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: 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 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 NO. 3

**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, 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 the 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, 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.

i. **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. **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.

n. ***Relevant Date Range.*** A Relevant Date Range is any of the following date ranges (inclusive of the first and last day of each range):

- i. 08/01/2012 – 05/01/2013
- ii. 03/07/2013 – 03/21/2013
- iii. 05/24/2014 – 07/31/2014
- iv. 08/01/2014 – 09/07/2014
- v. 12/01/2014 – 12/31/2014
- vi. 01/20/2015 – 02/14/2015
- vii. 03/03/2015 – 04/21/2015
- viii. 03/21/2015 – 04/11/2015
- ix. 08/01/2015 – 09/15/2015
- x. 11/25/2015 – 12/13/2015
- xi. 12/01/2015 – 01/14/2016
- xii. 04/01/2016 – 05/20/2016

xiii. 05/21/2016 – 06/21/2016

xiv. 07/01/2016 – 08/01/2016

o. **Relevant Entity.** A “Relevant Entity” is any of the following:

A Contrario	JDSV Holdings, Inc.	SCI La Pierre Investment Trust
Brave Pictures, Inc.	John C. Depp II Insurance Trust	Stratton Films, Inc.
Contre Courant	John C. Depp II Living Trust	Swag LLC
Elisa’s Attic LLC	Junior Varsity Productions LLC	Sweetzer Trust, LLC
Gelt Valleyview Holdings LLC	L.R.D. Productions, Inc.	The Depp Irrevocable Trust
HST Archives, LLC	Le Hameau du Bebe, LLC	The Mooh Investment Trust
Infinitum Nihil Media, LLC	Matar II LLC	Unison Music Group
Infinitum Nihil Music, LLC	Matar LLC	Vajoliroja, LLC
Infinitum Nihil Publishing, LLC	P Music Group, LLC	Versailles Road Trust
Infinitum Nihil Records, LLC	Plus Capital Management, LLC	6909 Ventures LLC
Infinitum Nihil, Inc.	Scaramanga Bros., Inc.	
JDM Ventures, LLC	SCI La Pierre	

p. **Relevant Individual.** A “Relevant Individual” is any of the following individuals:

Eugene Arreola	Josh Drew	Kevin Murphy
Isaac Baruch	Trinity Esparza	Brandon Patterson
Robin Baum	Brad Furman	C.J. Roberts
Lisa Beane	Jason Gonet	Tara Roberts
Sean Bett	Tyler Hadden	Alejandro Romero
Paul Bettany	Cornelius Harrell	Melissa Saenz
Erin Falati (formerly Boerum)	Nathan Holmes	Trudy Salven
Malcolm Connolly	Jerry Judge	Miguel Sanchez
Dr. Connell Cowan	Ben King	Sam Sarkar
Bobby de Leon	Dr. David Kipper	Doug Stanhope
Elisa "Christi" Dembrowski	Damien Leonard	Norman Todd
Leonard Damian	Debbie Lloyd	Bruce Witkin
Gina Deuters	Joel Mandel	Keenan Wyatt
Stephen Deuters	Samantha McMillen	
Laura Divenere	Andrew Milner	

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

r. **Romantic Partners.** The term "Romantic Partners" shall mean any persons You know to have been in a romantic or sexually intimate relationship with Mr. Depp.

s. **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. All documents and/or communications with Mr. Depp that refer or relate to Ms. Heard.
2. All documents and/or communications with Ms. Heard that refer or relate to Mr. Depp.
3. All documents and/or communications concerning the relationship between Mr. Depp and Ms. Heard.
4. All documents and/or communications with Mr. Depp, Ms. Heard, or any Relevant Individual within a Relevant Date Range.
5. All documents and/or communications concerning any act or alleged act of physical violence and/or abuse involving Mr. Depp and any person (whether or not Mr. Depp himself was violent and/or abusive).

6. All documents and/or communications concerning any act or alleged act of Mr. Depp that resulted in damage to property.
7. All documents and/or communications concerning any use or alleged use of drugs (whether legal or illegal) and/or alcohol by Mr. Depp.
8. All documents and/or communications concerning any of Mr. Depp's Romantic Partners (other than Ms. Heard) concerning any act or alleged act of physical violence and/or abuse involving Mr. Depp (whether or not Mr. Depp himself was violent and/or abusive); any act or alleged act of Mr. Depp that resulted in damage to property; or any use or alleged use of drugs (whether legal or illegal) and/or alcohol by Mr. Depp.
9. All documents and/or communications concerning Mr. Depp's emotional, mental, or psychological condition or state, including but not limited to any erratic behavior, expressions of anger or rage, confusion, memory loss, delusions, and/or detachment from reality.
10. All documents and/or communications concerning any injury that Mr. Depp suffered to his hand(s) and/or finger(s) in Australia in or around March 2015.
11. All documents and/or communications concerning a flight from Boston on or around May 24, 2014.
12. All documents and/or communications concerning any statement by You to TMZ in relation to the article "Johnny Depp Assistant Says Texts Were Doctored," dated June 2, 2016 (*see* <https://www.t TMZ.com/2016/06/02/johnny-depp-assistant-denies-text-messages-amber-heard/>).
13. Copies of any contracts, agreements, and/or understandings, whether formal or informal, entered into between You on the one hand, and Mr. Depp, any person or entity acting on Mr. Depp's behalf or Engaged by Mr. Depp, and/or any Relevant Individual, on the other.

14. All guidelines, instructions, directions, requests, or demands, whether formal or informal, provided to You in connection with (a) Your Engagement for Mr. Depp or (b) any actions You took on behalf of Mr. Depp or at the direction or request of Mr. Depp or any person or entity acting on Mr. Depp's behalf.

15. All documents and/or communications concerning any guidelines, instructions, directions, requests, or demands, whether formal or informal, written or oral relating to any person Engaged to provide security and/or personal protection services for Mr. Depp.

16. All documents and/or communications concerning any payments, gifts, or transfers of value of any kind, whether in monetary form or otherwise, from Mr. Depp (and/or any entity or person affiliated or associated with Mr. Depp or acting on his behalf) to or for the benefit of You (and/or any entity or person affiliated or associated with You or acting on Your behalf).

17. All documents and/or communications concerning any transactions, payments, gifts, or transfers of value of any kind, whether in monetary form or otherwise, made by You (and/or any entity or person affiliated or associated with You or acting on Your behalf) to or for the benefit of any Relevant Individual (and/or any entity or person affiliated or associated with any Relevant Individual or acting on behalf of a Relevant Individual).

18. All documents and/or communications concerning any transactions, payments, gifts, or transfers of value of any kind, whether in monetary form or otherwise, relating to any act or alleged act of physical violence and/or abuse by Mr. Depp.

19. All documents and/or communications concerning any transactions, payments, gifts, or transfers of value of any kind, whether in monetary form or otherwise, relating to any act or alleged act of Mr. Depp that resulted in damage to property.

20. All documents and/or communications within any Relevant Date Range concerning the provision of cleaning, housekeeping, restoration, repair, remediation, or maintenance and/or other domestic services in relation to any property owned or used by Mr. Depp (including any hotel, rental house, apartment, suite, or other accommodation).

21. All documents and/or communications concerning any testimony or statement, whether oral or written and whether in draft or final form, in relation to this Action and/or any other lawsuit or proceeding involving or relating to Mr. Depp.

* * *

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.)*

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(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 1 of 2*(Add pages as required)*

SHORT TITLE: Depp v. Heard	CASE NUMBER: CL-2019-0002911
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ATTACHMENT (Number): 4 Cont.*(This Attachment may be used with any Judicial Council form.)*

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Page 2 of 2*(Add pages as required)*

SHORT TITLE: Depp v. Heard	CASE NUMBER: CL-2019-0002911
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ATTACHMENT (Number): 6

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

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)

VIRGINIA:

IN THE CIRCUIT COURT OF FAIRFAX COUNTY

JOHN C. DEPP, II

Plaintiff,

v.

Civil Action No.: CL-2019-0002911

AMBER LAURA HEARD

Defendant.

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 and Subpoena Duces Tecum To Person Under Foreign Subpoena to be sent via email, per the parties' agreement regarding service by electronic mail, on the 19th day of December, 2019, to counsel of record.

 VSB 89602
/ permission

J. Benjamin Rottenborn

J. Benjamin Rottenborn (VSB #84796)
Joshua R. Treece (VSB #79149)
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brottenborn@woodsrogers.com
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Attorneys for Defendant Amber Laura Heard

I certify that on this 19th day of December 2019, a copy of the foregoing shall be served via email, per the parties' agreement regarding service by electronic mail, and by email, upon:

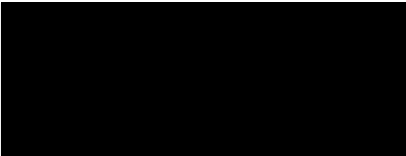
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December 19, 2019

FILED
CIVIL INTAKE
2019 DEC 20 PM 2:58
JOHN T. FREY
CLERK, CIRCUIT COURT
FAIRFAX, VA

VIA OVERNIGHT UPS DELIVERY

John T. Frey, Clerk
Fairfax County Circuit Court
4110 Chain Bridge Road
Fairfax, Virginia 22030

**Re: John C. Depp, II v. Amber Laura Heard;
Fairfax County Circuit Court Case No. CL2019-0002911
Subpoena for Documents (1) : Stephen Deuters**

Dear Mr. Frey,

In the above-referenced matter, enclosed for filing please find two 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 Subpoena for Production of Business Records in Action Pending Outside California and Subpoena Duces Tecum To Person Under Foreign Subpoena 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 a file-stamped copy of the same in the enclosed, self-addressed envelope.

Thank you for your assistance and please do not hesitate to call with any questions or concerns.

Very truly yours,

WOODS ROGERS PLC



*per 3/5/17
SB 89602*

Ben Rottenborn

JBR:jt
Enclosures

{2655556-1, 121024-00001-01}

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