

VIRGINIA:

IN THE CIRCUIT COURT OF FAIRFAX COUNTY

John C. Depp, II,	)
	)
Plaintiff,	)
	)
v.	)
	)
Amber Laura Heard,	)
	)
Defendant.	)

Civil Action No.: CL-2019-0002911

**PLAINTIFF JOHN C. DEPP, II'S MEMORANDUM IN SUPPORT OF PLAINTIFF'S MOTION TO COMPEL DEFENDANT AMBER LAURA HEARD'S RESPONSES TO SECOND AND THIRD REQUESTS FOR PRODUCTION OF DOCUMENTS AND SECOND INTERROGATORIES**

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*Counsel for Plaintiff John C. Depp, II*

With critical depositions mere weeks away, Ms. Heard is blatantly stonewalling Mr. Depp's attempts to take basic discovery, and is standing on patently improper objections. Mr. Depp served his Second Set of Requests for Production eleven months ago, and has yet to receive appropriate responses to several requests. **Exhibit 1**. Ms. Heard is also standing on frivolous objections to Mr. Depp's Third Request for Production, **Exhibit 2**, and Second Interrogatories, **Exhibit 3**. Mr. Depp respectfully requests that the Court order Ms. Heard to supplement her non-responses, and sanction Ms. Heard for her ongoing discovery misconduct.

**I. Mr. Depp's Requests for Production**

Mr. Depp's Second RFPs, No. 7 seeks documents sufficient to show Ms. Heard's prior arrest records. Although she moved to compel arrest records from Mr. Depp in September 2019, Ms. Heard has refused point blank to provide any documents in response to RFP No. 7, asserting that her prior arrests are not admissible at trial, and therefore are not discoverable. Ms. Heard is incorrect. The scope of discovery is obviously broader than that which is admissible at trial, and extends to "any matter, not privileged, which is relevant to the subject matter" of the action. Va. S. Ct. R. 4:1(b)(1). Here, Mr. Depp contends that Ms. Heard was the true abuser in their relationship, and her past records of arrest certainly have a potential tendency to shed light or disclose evidence in support of that claim. Moreover, Ms. Heard has now filed a Counterclaim for, among other things, defamation—*and as Ms. Heard herself specifically argued in her own motion to compel Mr. Depp's arrest records*, "[i]n a defamation case, prior acts that bear on a plaintiff's character and *modus operandi* are regularly deemed relevant," citing *Schafer v. Time, Inc.*, 142 F.3d 1361, 1370-71 (11th Cir. 1998). (See Ms. Heard's September 27, 2020 Motion to Compel at p. 4.) Given Mr. Depp's contention that Ms. Heard engaged in violent behavior, which she tried to cover by falsely accusing him, the appropriateness of RFP No. 7 is undeniable.

Mr. Depp's Second RFPs, No. 23, and Third RFPs, Nos. 50 and 51 all seek documents and communications between Ms. Heard and a U.K. tabloid, The Sun, which was a party to litigation in the UK with Mr. Depp for defamation. These RFPs seek documents related to the claims or defenses in this action, and the similar claims in the U.K. action. Ms. Heard served objection-only responses, and refused to provide *any* documents, asserting that these RFPs are irrelevant and/or violate the attorney-client privilege or common interest doctrine. Nonsense. In the first place, the RFPs generally seek documents and communications regarding the UK Action, and certainly encompass non-privileged communications, even assuming that any privilege could possibly apply. Moreover, before the common interest doctrine may be invoked as to any subset of such documents, there must first be an underlying privilege. No privilege protects communications between Ms. Heard and The Sun, as they are not in an attorney-client relationship. *See In re Zetia Antitrust Litig.*, 2019 WL 6122011 at \*2 (E.D. Va. Oct. 3, 2019) (the common interest doctrine “applies when two or more parties consult or retain an attorney concerning a legal matter in which they share a common interest[]” and only protects communications “which relate to the giving or receiving of legal advice”). Thus, direct communications between Ms. Heard and The Sun are not privileged. Even assuming that the common interest doctrine could be construed broadly enough to include communications among their respective attorneys, it would only apply to communications that involved the giving of legal advice as to a matter in which both parties had a legal interest, and not communication of mere underlying facts. *See In re Zetia*, 2019 WL 6122011 at \*2.

Moreover, *Ms. Heard was merely a third-party witness in the U.K. action, with no financial stake in its outcome, and no alleged liability in the U.K. Action.* Her only interest in its outcome and in assisting The Sun in the preparation and presentation of its case would have

been personal rather than legal, such as a concern about negative publicity. But that is not sufficient to invoke the doctrine. *See U.S. v. Aramony*, 88 F.3d 1369, 1391 (4th Cir. 1996) (the preservation of one's reputation is not a legal matter). Ms. Heard has not met her burden of establishing that all (indeed, any) of the documents sought by these RFPs are protected from disclosure. *Id.* at 1392. And even assuming (without conceding) that Ms. Heard had a viable argument that *some* such communications *might* be privileged, that would not justify her objection-only responses to these RFPs, which seek materials that are manifestly relevant. Rather, she must agree to produce all responsive, non-privileged documents, and any documents sought to be withheld on privilege grounds must be logged.

Mr. Depp's Third RFP Nos. 42, 43, and 52 seek communications between Ms. Heard and other persons, including her current girlfriend, Bianca Butti, regarding the Depp-Heard relationship; this action; the U.K. action; the subject matter of the same; and any injuries Ms. Heard contends she received as a result of conduct by Mr. Depp. Astoundingly, Ms. Heard has objected to these RFPs on relevance grounds. It simply does not pass the straight face test for Ms. Heard to argue that her communications regarding the Depp-Heard relationship and any injuries she claims to have sustained at the hands of Mr. Depp are not relevant. These RFPs relate directly to the subject matter of this action, i.e., Ms. Heard's false claims that she is an abuse victim. In any case, *relevance*, by itself, is not a valid objection in discovery. *See* Va. S. Ct. Rule 4:1. These categories of information are reasonably calculated to lead to the discovery of evidence, and as such are clearly appropriate.<sup>1</sup>

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<sup>1</sup> Mr. Depp notes, in passing, that Ms. Heard's own discovery has included similar but broader requests, such as her Fourth RFPs, No. 4, which demanded "All communications between Mr. Depp and any person or entity referring to or relating in any manner to Ms. Heard," without even limiting the scope of the RFP to the Depp/Heard relationship, as Mr. Depp has done in his RFPs.

Similarly, Ms. Heard's position that communications with Ms. Butti are excluded from discovery has no basis in law. To the extent that this is an attempt to invoke the marital privilege, it is invalid, since Ms. Heard and Ms. Butti are not married. *See* Va. Code § 8.01-398 ("a person has a privilege to refuse to disclose... any confidential communication between his *spouse* and him *during their marriage*") (emphasis added). To the extent that Ms. Heard is arguing that her communications with Ms. Butti are by definition irrelevant, her position makes no sense. These RFPs seek specific topics of communications that are at issue in this action. If Ms. Heard has communicated with any person, including Ms. Butti, regarding her claims of abuse or the Depp-Heard relationship, such communications are properly subject to discovery in this action.

Mr. Depp's Third RFPs, Nos. 44, 45, 46, and 47 seek documents related to Ms. Heard's widely-publicized claims that "money played no role" in her divorce of Mr. Depp and public allegations of abuse, which Ms. Heard sought to demonstrate by purportedly donating the entirety of the settlement proceeds from her divorce to charity. The relevance of these RFPs is clear. Mr. Depp contends that Ms. Heard invented out of whole cloth a completely false narrative of abuse. Ms. Heard's motives for fabricating her claims will very likely be an issue at trial. Mr. Depp contends that she sought to leverage these allegations to obtain a larger divorce settlement, and to market herself to the world as a courageous survivor, rather than an abuser. But Ms. Heard has publicly claimed that her motives had nothing to do with money, and will presumably testify to that effect at trial. Mr. Depp seeks to test those claims in discovery.

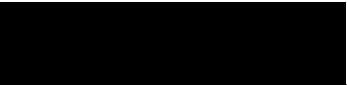
It was widely publicized that Ms. Heard was not keeping any of the settlement, and intended to donate it all to charity. Ms. Heard herself drew a connection between her claimed donations and her motives, publicly announcing that: "*As described in the restraining order and divorce settlement, money played no role for me personally and never has, except to the extent*

*that I could donate it to charity and, in doing so, hopefully help those less able to defend themselves. As reported in the media, the amount received in the divorce was \$7 million and \$7 million is being donated.*” With this discovery, Mr. Depp merely seeks to test Ms. Heard’s public claims that “money played no role” in her actions. Mr. Depp anticipates that at trial, Ms. Heard may seek to testify that she had no motive to invent a false narrative of abuse. Confirming whether she actually donated the settlement proceeds to charity as she publicly claims to have done could be critical in preparing to address that testimony. As such, this subject is relevant, and appropriately subject to discovery. Nor is there *any* valid privacy interest in purported donations that were widely reported in the media, and were announced by Ms. Heard herself to the world. **Exhibits 4-7.**

## **II. Mr. Depp’s Second Set of Interrogatories**

Mr. Depp’s Second Interrogatory Nos. 1, 7, 8, and 9 seek the identification of witnesses and contact information; Ms. Heard’s romantic partners in the past 10 years (potential witnesses to her pattern of abusive behavior); description of separation agreements and the like with other romantic partners (relevant for the same reason); and allegations of physical violence, abuse and destruction of property from any other romantic partner (same). Mr. Depp contends that Ms. Heard is abusive and violent, and covered her own abusive behavior by falsely accusing him. Seeking discovery into past episodes of Ms. Heard’s violence may tend to bolster Mr. Depp’s arguments, give insight into Ms. Heard’s patterns of similar behavior, identify potential witnesses, and guide further discovery. Ms. Heard has successfully sought the identification of Mr. Depp’s past romantic partners, and cannot complain that Mr. Depp is seeking the same discovery. In addition, Ms. Heard must supplement her response to Interrogatory No. 1 to add contact information for witnesses.

Respectfully submitted,

  
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*Counsel for Plaintiff John C. Depp, II*

Dated: October 29, 2020

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this 29th day of October 2020, I caused copies of the foregoing to be served via email (per written agreement between the Parties) on the following:

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*Counsel for Defendant Amber Laura Heard*

  
\_\_\_\_\_  
Andrew C. Crawford



# **Exhibit 1**

VIRGINIA:

IN THE CIRCUIT COURT OF FAIRFAX COUNTY

JOHN C. DEPP, II

Plaintiff,

v.

AMBER LAURA HEARD

Defendant.

Civil Action No.: CL-2019-0002911

**DEFENDANT AMBER LAURA HEARD'S RESPONSES AND OBJECTIONS TO  
PLAINTIFF'S SECOND SET OF REQUESTS FOR PRODUCTION**

Pursuant to Rule 4:9 of the Rules of the Supreme Court of Virginia ("Rules"), Defendant Amber Laura Heard, by and through her attorneys, submits these responses and objections (the "Responses") to Plaintiff John C. Depp's Second Set of Requests for Production dated November 4, 2019 (the "Requests").

**GENERAL OBJECTIONS**

The following general objections and responses (the "General Objections") are incorporated into each specific objection and response (the "Specific Objections") as if fully set forth therein:

1. Defendant objects to the Requests to the extent they are duplicative, cumulative, or seek information that has been or will be provided through other means of discovery.
2. Defendant objects to the Requests to the extent they are vague, ambiguous, overly broad, unduly burdensome, seek information not relevant to the claims or defenses of any party, or are not proportional to the needs of the case.

3. Defendant objects to the Requests to the extent they impose any obligations or requirements beyond the scope of the Rules or any case law interpreting them.

4. Defendant's Responses are not intended to be and shall not be construed as an agreement or concurrence that all information provided is admissible with respect to Plaintiff's claims.

5. Defendant objects to each Request to the extent that it calls for information that: (a) may be derived or ascertained from documents that have been or will be produced in this action; (b) is already in Plaintiff's possession, custody, or control; (c) is publicly available; or (d) is otherwise independently available to Plaintiff or his counsel.

6. Defendant objects to the Requests to the extent they purport to call for documents or information that: (a) are subject to the attorney-client privilege; (b) constitute attorney work product; (c) are protected from disclosure based on common interest or a similar privilege; or (d) are otherwise protected from disclosure under applicable privilege, law, or rule. Defendant will not produce such information in response to the Requests, and any inadvertent production thereof shall not be deemed a waiver of any privilege with respect to such information.

7. Defendant objects to the Requests to the extent they require unreasonable measures to locate and produce responsive information or documents. Defendant will construe the requests to require a reasonable and diligent search of its reasonably-accessible files where it would reasonably expect to find information, documents, or things related to the requests, and specifically states that it will limit its search for ESI by use of the agreed and identified search terms and ESI protocol proposed by Defendant.

8. Defendant objects to the Requests to the extent they seek information that is not within Defendant's possession, custody, or control. Subject to this General Objection, in

responding to the Requests, Defendant will provide only responsive information within Defendant's possession, custody, or control.

9. Defendant objects to the Definitions and Instructions to the extent they seek to impose obligations greater than those imposed by the Rules or any other applicable law, rule, or agreement of the parties.

10. Defendant objects to the Requests to the extent they are based on a false premise and contain express or implied assumptions of fact or law with respect to matters at issue in this case. Defendant's Responses to the Requests are not intended to be and shall not be construed as an agreement or concurrence with Plaintiff's characterization of any facts, circumstances, or legal obligations. Defendant reserves the right to contest any such characterization as inaccurate.

11. Defendant expressly reserves all rights and privileges under the Rules and any other applicable law or rule. The failure to assert such rights and privileges or the inadvertent disclosure by Defendant of information or documents protected by such rights or privileges shall not constitute a waiver thereof, either with respect to these Responses or with respect to any future discovery objections or responses.

12. Defendant's Responses to the Requests are made to the best of her present knowledge, information, and belief. These Responses are at all times subject to such additional or different information that discovery or further investigation may disclose and, while based on the present state of Defendant's knowledge and investigation, are subject to such additional knowledge of facts as may result from Defendant's further discovery or investigation.

## SPECIFIC OBJECTIONS AND RESPONSES

### REQUEST NO. 1

All Documents and Communications between You and any person employed by You or working on your behalf pertaining to any act of violence, or attempted acts of violence by You or Mr. Depp in the past 10 years.

### RESPONSE TO REQUEST NO. 1

Defendant objects to Request No. 1 to the extent that it seeks information that is not relevant to any party's claims or defenses. The issue in dispute is whether or not statements in the Op-ed are defamatory and whether there is an implication therein that Defendant was subject to domestic abuse by Plaintiff. Defendant's actions involving persons other than Plaintiff are not relevant or likely to lead to the discovery of admissible evidence. Subject to and without waiving the foregoing objections, Defendant will conduct a reasonable search for documents responsive to this Request, including by applying the search terms agreed to in Defendant's October 29, 2019 Letter. Defendant will thereafter produce any non-privileged documents that are responsive to this Request and that refer or relate to the claims and defenses in this case.

### REQUEST NO. 2

All Documents and Communications between You and any person employed by You or working on your behalf pertaining to the use of narcotics by You or Mr. Depp from 2013 to present.

### RESPONSE TO REQUEST NO. 2

Defendant objects to Request No. 2 to the extent that it seeks information that is not relevant to any party's claims or defenses. Defendant is not alleged to have any addiction or dependency issue that are in dispute in this action. Defendant objects to this request to the extent it relates to the use of narcotics by Defendant on the grounds that it is overly broad, unduly burdensome, and seeks information that is not relevant to either party's claims or defenses and is

disproportionate to the needs of this case because it is not reasonably limited to medications for injuries or conditions Defendant suffered as a result of Mr. Depp's abuse. Subject to and without waiving the foregoing objections, Defendant will conduct a reasonable search for documents responsive to this Request, including by applying the search terms agreed to in Defendant's October 29, 2019 Letter. Defendant will thereafter produce any non-privileged documents that are responsive to this Request and that refer or relate to the claims and defenses in this case.

### **REQUEST NO. 3**

**All Documents and Communications pertaining to any treatment for alcohol or drug use or abuse by You or Mr. Depp from 2013 to present.**

### **RESPONSE TO REQUEST NO. 3**

Defendant objects to Request No. 3 to the extent that it seeks information that is not relevant to any party's claims or defenses. Defendant is not alleged to have any alcohol, drug, addiction or dependency issue that are in dispute in this action. Defendant objects to this request to the extent it relates to the use of drugs or alcohol by Defendant on the grounds that it is overly broad, unduly burdensome, and seeks information that is not relevant to either party's claims or defenses and is disproportionate to the needs of this case because it is not reasonably limited to treatment for alcohol or drug use or abuse by Plaintiff or treatment for injuries or conditions Defendant suffered as a result of Mr. Depp's domestic abuse. Subject to and without waiving the foregoing objections, Defendant will conduct a reasonable search for documents responsive to this Request, including by applying the search terms agreed to in Defendant's October 29, 2019 Letter. Defendant will thereafter produce any non-privileged documents that are responsive to this Request and that refer or relate to the claims and defenses in this case.

#### **REQUEST NO. 4**

**Documents sufficient to show payments You or anyone acting on your behalf made to any firm or entity that provides services related to print, television, newspaper or other traditional media from 2015 to present, not including for services related to marketing films.**

#### **RESPONSE TO REQUEST NO. 4**

Defendant objects to Request No. 4 on the grounds that it is overly broad, unduly burdensome, and seeks information not relevant to the claims or defenses of any party. Defendant will not produce documents responsive to this request.

#### **REQUEST NO. 5**

**All Documents and Communications by and between you and Raquel Pennington, iO Tillett Wright, Elizabeth Marz, Whitney Heard, or Josh Drew that mention Mr. Depp or any of Your other Romantic Partners from 2010 to April, 2019.**

#### **RESPONSE TO REQUEST NO. 5**

Defendant objects to Request No. 5 to the extent it seeks information related to other Romantic Partners of Defendant on the grounds that it is overly broad, unduly burdensome, and seeks information not relevant to the claims or defenses of any party. The issue in dispute is whether or not statements in the Op-ed are defamatory and whether there is an implication therein that Defendant was subject to domestic abuse *by Plaintiff*. Defendant's relationships with others are not relevant to Plaintiff's domestic abuse of Defendant. Subject to and without waiving the foregoing objections, Defendant will conduct a reasonable search for documents responsive to this Request, including by applying the search terms agreed to in Defendant's October 29, 2019 Letter. Defendant will thereafter produce any non-privileged documents that are responsive to this Request and that refer or relate to the claims and defenses in this case.

### **REQUEST NO. 6**

**All Documents and Communications exchanged between You or anyone acting on Your behalf and Dr. David Kipper that mention Mr. Depp or any of Your other Romantic Partners from 2010 to present.**

### **RESPONSE TO REQUEST NO. 6**

Defendant objects to Request No. 6 to the extent it seeks information related to other Romantic Partners of Defendant on the grounds that it is overly broad, unduly burdensome, and seeks information not relevant to the claims or defenses of any party. The issue in dispute is whether or not statements in the Op-ed are defamatory and whether there is an implication therein that Defendant was subject to domestic abuse *by Plaintiff*. Defendant's relationships with others are not relevant to Plaintiff's domestic abuse of Defendant. Defendant further objects to this request on the grounds that it is not reasonably limited to treatment for physical and/or mental injuries or conditions Defendant suffered as a result of Mr. Depp's abuse. Subject to and without waiving the foregoing objections, Defendant will conduct a reasonable search for documents responsive to this Request, including by applying the search terms agreed to in Defendant's October 29, 2019 Letter. Defendant will thereafter produce any non-privileged documents that are responsive to this Request and that refer or relate to the claims and defenses in this case.

### **REQUEST NO. 7**

**Documents sufficient to show each time You were arrested and the reason(s) for the arrest.**

### **RESPONSE TO REQUEST NO. 7**

Defendant objects to Request No. 7 on the grounds that it seeks information not relevant to the claims or defenses of any party and that it seeks documents not within the custody or control of Defendant. The issue in dispute is whether or not statements in the Op-ed are defamatory and



whether there is an implication therein that Defendant was subject to domestic abuse *by Plaintiff*.

Defendant's arrests are not relevant to Plaintiff's domestic abuse of Defendant.

#### **REQUEST NO. 8**

**A complete copy of all medical records, charts and files from any mental and/or physical health care providers who have seen, consulted, examined or provided treatment or services to You from 2010 to the present, including but not limited to Dr. David Kipper.**

#### **RESPONSE TO REQUEST NO. 8**

Defendant objects to Request No. 8 on the grounds that it is overly broad, unduly burdensome, and seeking information that is not relevant to either party's claims or defenses and disproportionate to the needs of this case because it is not reasonably limited to treatment for physical and/or mental injuries or conditions Defendant suffered as a result of Mr. Depp's abuse. Subject to and without waiving the foregoing objections, Defendant will produce medical records, if any, related to relevant services and treatment she received from the medical providers identified in Defendant's Response to Interrogatory 5 of Plaintiff's Second Set of Interrogatories.

#### **REQUEST NO. 9**

**Copies of all of Your personal journals and/or diaries from 2010 to the present.**

#### **RESPONSE TO REQUEST NO. 9**

Defendant objects to Request No. 9 on the grounds that it is overly broad and unduly burdensome because it is not reasonably limited to information relating to Plaintiff's domestic abuse of Defendant and therefore seeks information that is not relevant to any party's claims or defenses. Subject to and without waiving the foregoing objections, Defendant will conduct a reasonable search for responsive documents in her custody and will non-privileged materials that refer or relate to the claims and defenses in this case, should any exist.

### **REQUEST NO. 10**

**Copies of any and all correspondence or other records that You or anyone acting on Your behalf received from or sent to: (1) any mental and/or physical health care providers from 2010 to the present; and (2) any health insurer providing you coverage for any medical, psychiatric, counseling, rehabilitation or other care from 2010 to the present.**

### **RESPONSE TO REQUEST NO. 10**

Defendant objects to Request No. 10 on the grounds that it is overly broad, unduly burdensome, and seeks information not relevant to the claims or defenses of any party because it is not reasonably limited to treatment for physical and/or mental injuries or conditions Defendant suffered as a result of Mr. Depp's abuse. Subject to and without waiving the foregoing objections, Defendant will produce medical records, if any, related to relevant services and treatment she received from the medical providers identified in Defendant's Response to Interrogatory 5 of Plaintiff's Second Set of Interrogatories.

### **REQUEST NO. 11**

**Documents sufficient to show any prescription drugs You have obtained from January 2010 to the present, including any prescription drugs that You currently take.**

### **RESPONSE TO REQUEST NO. 11**

Defendant objects to Request No. 11 on the grounds that it is overly broad, unduly burdensome, and seeks information not relevant to the claims or defenses of any party because it is not reasonably limited to treatment for physical and/or mental injuries or conditions Defendant suffered as a result of Mr. Depp's abuse. Subject to and without waiving the foregoing objections, Defendant will produce medical records, if any, related to services and treatment she received from the medical providers identified in Defendant's Response to Interrogatory 5 of Plaintiff's Second Set of Interrogatories.

**REQUEST NO. 12**

**Copies of any reports, written memoranda or notes prepared by each expert witness that You will or may call as a witness at the trial of this matter.**

**RESPONSE TO REQUEST NO. 12**

Defendant objects to Request No. 12 as premature. Defendant is working to identify experts and prepare expert disclosures that will be disclosed to Plaintiff on or before Defendant's expert disclosure deadline.

**REQUEST NO. 13**

**Copies of all journal articles, learned treatises, periodicals, pamphlets, or any other type of publication that each of Your expert witnesses or specialists has used or relied upon in forming his or her opinion in this case, or that You otherwise will or may use at trial.**

**RESPONSE TO REQUEST NO. 13**

Defendant objects to Request No. 13 as premature. Defendant will comply with all expert disclosure obligations under the Rules.

**REQUEST NO. 14**

**Copies of all exhibits or demonstrative exhibits You or Your attorneys will or may use, introduce or attempt to introduce at the trial of this matter.**

**RESPONSE TO REQUEST NO. 14**

Defendant objects to Request No. 14 as premature. Defendant has not yet determined which exhibits or demonstrative exhibits it will introduce at trial. Defendant will comply with all disclosure obligations relating to exhibits under the Rules.

**REQUEST NO. 15**

**Copies of all written statements taken or assembled in connection with this Action or with Your investigation, formal or informal, of the matters at issue in this Action, and all drafts and redlines/blacklines or edits thereof.**

### **RESPONSE TO REQUEST NO. 15**

Defendant objects to Request No. 15 on the grounds that it calls for information protected by one or more privileges, including the attorney-client, work product, and/or common interest privileges. Subject to and without waiving the foregoing objections, Defendant will conduct a reasonable search for documents responsive to this Request. Defendant will thereafter produce any non-privileged documents that are responsive to this Request and that refer or relate to the claims and defenses in this case.

### **REQUEST NO. 16**

**All documents viewed by, relied upon, or referred to in answering any Interrogatory propounded by Mr. Depp.**

### **RESPONSE TO REQUEST NO. 16**

Defendant objects to Request No. 16 to the extent that it calls for information protected by one or more privileges, including the attorney-client, work product, and/or common interest privileges. Defendant objects to this request to the extent it is overly broad, unduly burdensome, and seeks information not relevant to the claims or defenses of any party. Defendant will produce non-privileged responsive documents only to the extent that they are responsive to another Request or Interrogatory to which Defendant has indicated that she will respond.

### **REQUEST NO. 17**

**To the extent not provided in response to other requests, all non-privileged documents, notes, records, tape recordings, video recordings, or other written or recorded materials prepared by You or on Your behalf concerning the occurrences described in the Complaint, Your Declaration, Your Op-Ed, and Your 2016 declaration submitted in support of your request for a temporary restraining order.**

### **RESPONSE TO REQUEST NO. 17**

Defendant objects to Request No. 17 to the extent that it calls for information protected by one or more privileges, including the attorney-client, work product, and/or common interest

privileges. Defendant objects to this request on the grounds that it is overly broad and unduly burdensome. Subject to and without waiving the foregoing objections, Defendant will conduct a reasonable search for documents responsive to this Request, including by applying the search terms agreed to in Defendant's October 29, 2019 Letter. Defendant will thereafter produce any non-privileged documents that are responsive to this Request and that refer or relate to the claims and defenses in this case.

#### **REQUEST NO. 18**

**All Documents and Communications by and between you and any person relating to the claims or defenses in this Action.**

#### **RESPONSE TO REQUEST NO. 18**

Defendant objects to Request No. 18 to the extent that it calls for information protected by one or more privileges, including the attorney-client, work product, and/or common interest privileges. Defendant further objects to this request to the extent that it is overly broad and unduly burdensome. Subject to and without waiving the foregoing objections, Defendant will conduct a reasonable search for documents responsive to this Request, including by applying the search terms agreed to in Defendant's October 29, 2019 Letter. Defendant will thereafter produce any non-privileged documents that are responsive to this Request and that refer or relate to the claims and defenses in this case.

#### **REQUEST NO. 19**

**All Documents and Communications by and between You and any person working or purporting to work on behalf of the American Civil Liberties Union ("ACLU") related to the Op-Ed, Your Declaration, and any claims or defenses in this Action.**

#### **RESPONSE TO REQUEST NO. 19**

Defendant objects to Request No. 19 on the grounds that it calls for information protected by one or more privileges, including the attorney-client, work product, and/or common interest

privileges. Defendant further objects to this request to the extent it is overly broad and unduly burdensome. Subject to and without waiving the foregoing objections, Defendant will conduct a reasonable search for documents responsive to this Request, including by applying the search terms agreed to in Defendant's October 29, 2019 Letter. Defendant will thereafter produce any non-privileged documents that are responsive to this Request and that refer or relate to the claims and defenses in this case.

#### **REQUEST NO. 20**

**All Documents and Communications by and between You and any person working or purporting to work on behalf of the Washington Post related to the Op-Ed, Your Declaration, and any claims or defenses in this Action.**

#### **RESPONSE TO REQUEST NO. 20**

Defendant objects to Request No. 20 on the grounds that it calls for information protected by one or more privileges, including the attorney-client, work product, and/or common interest privileges. Subject to and without waiving the foregoing objections, Defendant will conduct a reasonable search for documents responsive to this Request, including by applying the search terms agreed to in Defendant's October 29, 2019 Letter. Defendant will thereafter produce any non-privileged documents that are responsive to this Request and that refer or relate to the claims and defenses in this case.

#### **REQUEST NO. 21**

**All Documents and Communications by and between You and any person working or purporting to work on behalf of the Virginia Press Association related to the Op-Ed, Your Declaration, and any claims or defenses in this Action, including the Virginia Press Association's motion for leave to file an amicus brief in this Action.**

#### **RESPONSE TO REQUEST NO. 21**

Defendant objects to Request No. 21 on the grounds that it calls for information protected by one or more privileges, including the attorney-client, work product, and/or common interest

privileges. Defendant further objects to this request on the grounds that it is overly broad, unduly burdensome, and seeks information not relevant to the claims or defenses of any party. Subject to and without waiving the foregoing objections, Defendant will conduct a reasonable search for documents responsive to this Request, including by applying the search terms agreed to in Defendant's October 29, 2019 Letter. Defendant will thereafter produce any non-privileged documents that are responsive to this Request and that refer or relate to the claims and defenses in this case.

#### **REQUEST NO. 22**

**All Documents and Communications by and between You and any person related to the ACLU's email to Plaintiff's counsel on September 13, 2019 containing a request to file an amicus brief in this Action.**

#### **RESPONSE TO REQUEST NO. 22**

Defendant objects to Request No. 22 on the grounds that it calls for information protected by one or more privileges, including the attorney-client, work product, and/or common interest privileges. Defendant further objects to this request on the grounds that it is overly broad, unduly burdensome, and seeks information not relevant to the claims or defenses of any party. Defendant will not produce documents responsive to this request, if any exist.

#### **REQUEST NO. 23**

**All Documents and Communications by and between You and any person working or purporting to work on behalf of The Sun related to the Op-Ed, Your Declaration, and any claims or defenses in this Action, and any claims or defenses in the action currently pending in London between Mr. Depp and The Sun.**

#### **RESPONSE TO REQUEST NO. 23**

Defendant objects to Request No. 23 on the grounds that it calls for information protected by one or more privileges, including the attorney-client, work product, and/or common interest privileges. Defendant further objects to this request on the grounds that it is overly broad, unduly

burdensome, and seeks information not relevant to the claims or defenses of any party. Defendant will not produce documents responsive to this request, if any exist.

**REQUEST NO. 24**

**All Documents and Communications that You produced either voluntarily or pursuant to subpoena or Court order in the action pending in London between Mr. Depp and The Sun.**

**RESPONSE TO REQUEST NO. 24**

Defendant agrees to produce such documents at such time as Plaintiff produces all documents he has produced in the action pending in London between Plaintiff and The Sun.

**REQUEST NO. 25**

**All Documents and Communications by and between You and any person working or purporting to work on Your behalf and any third party regarding providing You with financial assistance with this Action and/or paying Your legal fees and costs related to this Action.**

**RESPONSE TO REQUEST NO. 25**

Defendant objects to Request No. 25 on the grounds that it seeks information not relevant to the claims or defenses of any party. In light of the foregoing objection, Defendant will not produce responsive materials, if any exist.

**REQUEST NO. 26**

**All Documents obtained by way of subpoena, threat of subpoena, and/or voluntarily in relation to this Action.**

**RESPONSE TO REQUEST NO. 26**

Defendant objects to Request No. 26 on the grounds that it is vague, ambiguous, overly broad, unduly burdensome, and seek information not relevant to the claims or defenses of any party. Subject to and without waiving the foregoing objections, Defendant will re-produce to Plaintiff documents produced to it by third-parties in connection with this case.

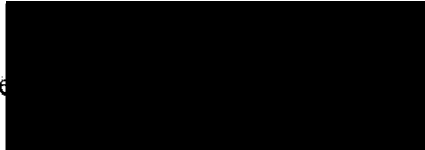


Dated this 25th day of November, 2019

Respectfully submitted,

Amber L. Heard

By Counsel



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*Counsel to Defendant Amber Laura Heard*

## CERTIFICATE OF SERVICE

I certify that on this 25<sup>th</sup> day of November 2019, a copy of the foregoing was served by

email upon:

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## **Exhibit 2**

**VIRGINIA:**

**IN THE CIRCUIT COURT OF FAIRFAX COUNTY**

JOHN C. DEPP, II

Plaintiff,

v.

AMBER LAURA HEARD

Defendant.

Civil Action No.: CL-2019-0002911

**DEFENDANT AMBER LAURA HEARD'S RESPONSES AND OBJECTIONS TO  
PLAINTIFF'S THIRD SET OF REQUESTS FOR PRODUCTION**

Pursuant to Rule 4:9 of the Rules of the Supreme Court of Virginia ("Rules"), Defendant Amber Laura Heard, by and through her attorneys, submits these responses and objections (the "Responses") to Plaintiff John C. Depp's Third Set of Requests for Production dated August 14, 2020 (the "Requests").

**GENERAL OBJECTIONS**

The following general objections and responses (the "General Objections") are incorporated into each specific objection and response (the "Specific Objections") as if fully set forth therein:

1. Defendant objects to the Requests to the extent they are duplicative, cumulative, or seek information that has been or will be provided through other means of discovery.
2. Defendant objects to the Requests to the extent they are vague, ambiguous, overly broad, unduly burdensome, seek information not relevant to the claims or defenses of any party, or are not proportional to the needs of the case.
3. Defendant objects to the Requests to the extent they impose any obligations or requirements beyond the scope of the Rules or any case law interpreting them.

4. Defendant's Responses are not intended to be and shall not be construed as an agreement or concurrence that all information provided is admissible with respect to Plaintiff's claims.

5. Defendant objects to each Request to the extent that it calls for information that: (a) may be derived or ascertained from documents that have been or will be produced in this action; (b) is already in Plaintiff's possession, custody, or control; (c) is publicly available; or (d) is otherwise independently available to Plaintiff or his counsel.

6. Defendant objects to the Requests to the extent they purport to call for documents or information that: (a) are subject to the attorney-client privilege; (b) constitute attorney work product; (c) are protected from disclosure based on common interest or a similar privilege; or (d) are otherwise protected from disclosure under applicable privilege, law, or rule. Defendant will not produce such information in response to the Requests, and any inadvertent production thereof shall not be deemed a waiver of any privilege with respect to such information.

7. Defendant objects to the Requests to the extent they require unreasonable measures to locate and produce responsive information or documents. Defendant will construe the requests to require a reasonable and diligent search of its reasonably-accessible files where it would reasonably expect to find information, documents, or things related to the requests.

8. Defendant objects to the Requests to the extent they seek information that is not within Defendant's possession, custody, or control. Subject to this General Objection, in responding to the Requests, Defendant will provide only responsive information within Defendant's possession, custody, or control.

9. Defendant objects to the Definitions and Instructions to the extent they seek to impose obligations greater than those imposed by the Rules or any other applicable law, rule, ruling of this court or agreement of the parties.

10. Defendant objects to the Requests to the extent they are based on a false premise and contain express or implied assumptions of fact or law with respect to matters at issue in this case. Defendant's Responses to the Requests are not intended to be and shall not be construed as an agreement or concurrence with Plaintiff's characterization of any facts, circumstances, or legal obligations. Defendant reserves the right to contest any such characterization as inaccurate.

11. Defendant expressly reserves all rights and privileges under the Rules and any other applicable law or rule. The failure to assert such rights and privileges or the inadvertent disclosure by Defendant of information or documents protected by such rights or privileges shall not constitute a waiver thereof, either with respect to these Responses or with respect to any future discovery objections or responses.

12. Defendant's Responses to the Requests are made to the best of her present knowledge, information, and belief. These Responses are at all times subject to such additional or different information that discovery or further investigation may disclose and, while based on the present state of Defendant's knowledge and investigation, are subject to such additional knowledge of facts as may result from Defendant's further discovery or investigation.

## SPECIFIC OBJECTIONS AND RESPONSES

1. **All photographs, pictures, and any other Documents that evidence, reflect, or depict any physical or other injuries You contend that You have sustained as a result of any action by Mr. Depp, including all associated metadata.**

**RESPONSE:**

Subject to the foregoing general objections, Defendant has produced in this action and/or in the U.K. litigation (which Plaintiff already possesses from the trial bundles) non-privileged responsive documents and will produce any additional, non-privileged documents that are identified by a reasonable search for such information that Defendant believes are responsive to this request.

2. **All Documents and/or Communications that refer, reflect, or relate to any purported act of violence or attempted violence involving Mr. Depp.**

**RESPONSE:**

Defendant objects to this request to the extent it is overbroad and unduly burdensome. Defendant objects to this request to the extent it seeks information that is in the possession, custody or control of Plaintiff or third parties. Defendant further objects to this request to the extent it seeks information that is available to and equally accessible to Plaintiff. Subject to the foregoing specific and general objections, Defendant has produced in this action and/or the U.K. litigation (which Plaintiff already possesses from the trial bundles) non-privileged responsive documents and will produce any additional, non-privileged documents that are identified by a reasonable search for such information that Defendant believes are responsive to this request.

3. **All Documents and/or Communications that refer, reflect, or relate to any physical or mental injuries You contend You have ever sustained as a result of any act of violence involving Mr. Depp.**

**RESPONSE:**

Defendant objects to this request to the extent it is overbroad and unduly burdensome. Defendant objects to this request to the extent it seeks information that is in the possession, custody or control of Plaintiff or third parties. Defendant further objects to this request to the extent it seeks information that is available to and equally accessible to Plaintiff. Subject to the foregoing specific and general objections, Defendant has produced in this action and/or the U.K. litigation (which Plaintiff already possesses from the trial bundles) non-privileged responsive documents and will produce any additional, non-privileged documents that are identified by a reasonable search for such information that Defendant believes are responsive to this request.

**4. All Documents and/or Communications that refer, reflect, or relate to any treatment You have ever received for any physical or mental injuries You sustained as a result of any act of violence involving Mr. Depp.**

**RESPONSE:**

Defendant objects to this request to the extent it is overbroad and unduly burdensome. Defendant objects to this request to the extent it seeks information that is in the possession, custody or control of Plaintiff or third parties. Defendant further objects to this request to the extent it seeks information that is available to and equally accessible to Plaintiff. Subject to the foregoing specific and general objections, Defendant has produced in this action and/or the U.K. litigation (which Plaintiff already possesses from the trial bundles) non-privileged responsive documents and will produce any additional, non-privileged documents that are identified by a reasonable search for such information that Defendant believes are responsive to this request.

**5. All Communications between You and any other Person regarding this Action and/or the subject matter thereof.**



**RESPONSE:**

Defendant objects to this request on the grounds that it is overbroad, unduly burdensome, and not relevant or likely to lead to the discovery of admissible evidence. Defendant objects to this request to the extent it seeks privileged information protected from disclosure, including information protected by the attorney-client privilege or work product doctrine and any other applicable privilege, immunity or protection. Subject to the foregoing specific and general objections, Defendant has produced in this action and/or the U.K. litigation (which Plaintiff already possesses from the trial bundles) non-privileged responsive documents and will produce any additional, non-privileged documents that are identified by a reasonable search that refer or relate to the claims or defenses in this case.

**6. All Communications between You and any other Person regarding the Divorce Action and/or the subject matter thereof.**

**RESPONSE:**

Defendant objects to this request on the grounds that it is overbroad, unduly burdensome and seeks information that is not relevant to the claims or defenses in this action and not relevant or reasonably calculated to lead to the discovery of admissible evidence. Defendant further objects to this request to the extent it seeks information that is already available to and equally accessible to Plaintiff. Defendant objects to this request to the extent it seeks privileged information protected from disclosure, including information protected by the attorney-client privilege or work product doctrine and any other applicable privilege, immunity or protection. Subject to the foregoing specific and general objections, Defendant has produced in this action and/or the U.K. litigation (which Plaintiff already possesses from the trial bundles) non-privileged responsive documents and will produce any additional, non-privileged documents that are identified by a reasonable search that refer or relate to the claims and defenses in this case.

**7. All Documents and/or Communications between You and any other Person pertaining to any act of violence, or attempted acts of violence by You or Mr. Depp in the past 10 years.**

**RESPONSE:**

Defendant objects to this request on the grounds that it is overbroad and unduly burdensome and seeks information that is not relevant to the claims or defenses in this action and not reasonably calculated to lead to the discovery of admissible evidence. Defendant further objects to this request to the extent it seeks information that is already available to and equally accessible to Plaintiff. Defendant objects to this request to the extent it seeks privileged information protected from disclosure, including information protected by the attorney-client privilege or work product doctrine and any other applicable privilege, immunity or protection. Subject to the foregoing specific and general objections, Defendant has produced in this action and/or the U.K. litigation (which Plaintiff already possesses from the trial bundles) non-privileged responsive documents and will produce any additional, non-privileged documents that are identified by a reasonable search that refer or relate to the claims and defenses in this case.

**8. All Communications between You and Raquel Pennington that refer or relate to Your relationship with Mr. Depp, including without limitation any Communications that refer or relate to the Action, the Divorce Action, the U.K. Action, any claims of abuse or violence involving Mr. Depp, and any injuries You contend You suffered as a result of any conduct by Mr. Depp.**

**RESPONSE:**

Defendant objects to this request on the grounds that it is overbroad and unduly burdensome and seeks information that is not relevant to the claims or defenses in this action and not reasonably calculated to lead to the discovery of admissible evidence. Defendant further objects to this request to the extent it seeks information that is already available to and equally accessible to Plaintiff. Defendant objects to this request to the extent it seeks privileged

information protected from disclosure, including information protected by the attorney-client privilege or work product doctrine and any other applicable privilege, immunity or protection. Subject to the foregoing specific and general objections, Defendant has produced in this action and/or the U.K. litigation (which Plaintiff already possesses from the trial bundles) non-privileged responsive documents and will produce any additional, non-privileged documents that are identified by a reasonable search that refer or relate to the claims and defenses in this case.

**9. All Communications between You and iO Tillett Wright that refer or relate to Your relationship with Mr. Depp, including without limitation any Communications that refer or relate to the Action, the Divorce Action, the U.K. Action, any claims of abuse or violence involving Mr. Depp, and any injuries You contend You suffered as a result of any conduct by Mr. Depp.**

**RESPONSE:**

Defendant objects to this request on the grounds that it is overbroad and unduly burdensome and seeks information that is not relevant to the claims or defenses in this action and not reasonably calculated to lead to the discovery of admissible evidence. Defendant further objects to this request to the extent it seeks information that is already available to and equally accessible to Plaintiff. Defendant objects to this request to the extent it seeks privileged information protected from disclosure, including information protected by the attorney-client privilege or work product doctrine and any other applicable privilege, immunity or protection. Subject to the foregoing specific and general objections, Defendant has produced in this action and/or the U.K. litigation (which Plaintiff already possesses from the trial bundles) non-privileged responsive documents and will produce any additional, non-privileged documents that are identified by a reasonable search that refer or relate to the claims and defenses in this case.

**10. All Communications between You and Elizabeth Marz that refer or relate to Your relationship with Mr. Depp, including without limitation any Communications that refer or relate to the Action, the Divorce Action, the U.K. Action, any claims of abuse or violence involving Mr. Depp, and any injuries You contend You suffered as a result of any conduct by Mr. Depp.**

**RESPONSE:**

Defendant objects to this request on the grounds that it is overbroad and unduly burdensome and seeks information that is not relevant to the claims or defenses in this action and not reasonably calculated to lead to the discovery of admissible evidence. Defendant further objects to this request to the extent it seeks information that is already available to and equally accessible to Plaintiff. Defendant objects to this request to the extent it seeks privileged information protected from disclosure, including information protected by the attorney-client privilege or work product doctrine and any other applicable privilege, immunity or protection. Subject to the foregoing specific and general objections, Defendant has produced in this action and/or the U.K. litigation (which Plaintiff already possesses from the trial bundles) non-privileged responsive documents and will produce any additional, non-privileged documents that are identified by a reasonable search that refer or relate to the claims and defenses in this case.

**11. All Communications between You and Whitney Henriquez that refer or relate to Your relationship with Mr. Depp, including without limitation any Communications that refer or relate to the Action, the Divorce Action, the U.K. Action, any claims of abuse or violence involving Mr. Depp, and any injuries You contend You suffered as a result of any conduct by Mr. Depp.**

**RESPONSE:**

Defendant objects to this request on the grounds that it is overbroad and unduly burdensome and seeks information that is not relevant to the claims or defenses in this action and not reasonably calculated to lead to the discovery of admissible evidence. Defendant further objects to this request to the extent it seeks information that is already available to and equally

accessible to Plaintiff. Defendant objects to this request to the extent it seeks privileged information protected from disclosure, including information protected by the attorney-client privilege or work product doctrine and any other applicable privilege, immunity or protection. Subject to the foregoing specific and general objections, Defendant has produced in this action and/or the U.K. litigation (which Plaintiff already possesses from the trial bundles) non-privileged responsive documents and will produce any additional, non-privileged documents that are identified by a reasonable search that refer or relate to the claims and defenses in this case.

**12. All Communications between You and Josh Drew that refer or relate to Your relationship with Mr. Depp, including without limitation any Communications that refer or relate to the Action, the Divorce Action, the U.K. Action, any claims of abuse or violence involving Mr. Depp, and any injuries You contend You suffered as a result of any conduct by Mr. Depp.**

**RESPONSE:**

Defendant objects to this request on the grounds that it is overbroad and unduly burdensome and seeks information that is not relevant to the claims or defenses in this action and not reasonably calculated to lead to the discovery of admissible evidence. Defendant further objects to this request to the extent it seeks information that is already available to and equally accessible to Plaintiff. Defendant objects to this request to the extent it seeks privileged information protected from disclosure, including information protected by the attorney-client privilege or work product doctrine and any other applicable privilege, immunity or protection. Subject to the foregoing specific and general objections, Defendant has produced in this action and/or the U.K. litigation (which Plaintiff already possesses from the trial bundles) non-privileged responsive documents and will produce any additional, non-privileged documents that are identified by a reasonable search that refer or relate to the claims and defenses in this case.

**13. All Communications between You and Jodi Gottlieb that refer or relate to Your relationship with Mr. Depp, including without limitation any Communications that refer or relate to the Action, the Divorce Action, the U.K. Action, any claims of abuse or violence involving Mr. Depp, and any injuries You contend You suffered as a result of any conduct by Mr. Depp.**

**RESPONSE:**

Defendant objects to this request on the grounds that it is overbroad and unduly burdensome and seeks information that is not relevant to the claims or defenses in this action and not reasonably calculated to lead to the discovery of admissible evidence. Defendant further objects to this request to the extent it seeks information that is already available to and equally accessible to Plaintiff. Defendant objects to this request to the extent it seeks privileged information protected from disclosure, including information protected by the attorney-client privilege or work product doctrine and any other applicable privilege, immunity or protection. Subject to the foregoing specific and general objections, Defendant has produced in this action and/or the U.K. litigation (which Plaintiff already possesses from the trial bundles) non-privileged responsive documents and will produce any additional, non-privileged documents that are identified by a reasonable search that refer or relate to the claims and defenses in this case.

**14. All Communications between You and Amanda de Cadenet that refer or relate to Your relationship with Mr. Depp, including without limitation any Communications that refer or relate to the Action, the Divorce Action, the U.K. Action, any claims of abuse or violence involving Mr. Depp, and any injuries You contend You suffered as a result of any conduct by Mr. Depp.**

**RESPONSE:**

Defendant objects to this request on the grounds that it is overbroad and unduly burdensome and seeks information that is not relevant to the claims or defenses in this action and not reasonably calculated to lead to the discovery of admissible evidence. Defendant further objects to this request to the extent it seeks information that is already available to and equally

accessible to Plaintiff. Defendant objects to this request to the extent it seeks privileged information protected from disclosure, including information protected by the attorney-client privilege or work product doctrine and any other applicable privilege, immunity or protection. Subject to the foregoing specific and general objections, Defendant has produced in this action and/or the U.K. litigation (which Plaintiff already possesses from the trial bundles) non-privileged responsive documents and will produce any additional, non-privileged documents that are identified by a reasonable search that refer or relate to the claims and defenses in this case.

**15. All Communications between You and Brandon McCulloch that refer or relate to Your relationship with Mr. Depp, including without limitation any Communications that refer or relate to the Action, the Divorce Action, the U.K. Action, any claims of abuse or violence involving Mr. Depp, and any injuries You contend You suffered as a result of any conduct by Mr. Depp.**

**RESPONSE:**

Defendant objects to this request on the grounds that it is overbroad and unduly burdensome and seeks information that is not relevant to the claims or defenses in this action and not reasonably calculated to lead to the discovery of admissible evidence. Defendant further objects to this request to the extent it seeks information that is already available to and equally accessible to Plaintiff. Defendant objects to this request to the extent it seeks privileged information protected from disclosure, including information protected by the attorney-client privilege or work product doctrine and any other applicable privilege, immunity or protection. Subject to the foregoing specific and general objections, Defendant will produce non-privileged documents that are identified by a reasonable search that refer or relate to the claims and defenses in this case.

**16. All Communications between You and Connell Cowan that refer or relate to Your relationship with Mr. Depp, including without limitation any Communications that refer or relate to the Action, the Divorce Action, the U.K. Action, any claims of abuse or violence involving Mr. Depp, and any injuries You contend You suffered as a result of any conduct by Mr. Depp.**

**RESPONSE:**

Defendant objects to this request on the grounds that it is overbroad and unduly burdensome and seeks information that is not relevant to the claims or defenses in this action and not reasonably calculated to lead to the discovery of admissible evidence. Defendant objects to this request to the extent it seeks confidential medical records and information that are not relevant to this action and/or unreasonably invades upon Defendant's medical privacy rights. The Court has already ruled on this issue. Subject to the foregoing specific and general objections, Defendant has produced in this action and/or the U.K. litigation (which Plaintiff already possesses from the trial bundles) all responsive documents in her possession, custody or control, subject to the ruling of the Court.

**17. All Documents that evidence or reflect any treatment You have received from Connell Cowan in connection with Your relationship with Mr. Depp.**

**RESPONSE:**

Defendant objects to this request on the grounds that it is overbroad and unduly burdensome and seeks information that is not relevant to the claims or defenses in this action and not reasonably calculated to lead to the discovery of admissible evidence. Defendant objects to this request on the grounds that it seeks confidential medical records and information that are not relevant to this action and unreasonably invades upon Defendant's medical privacy rights. Defendant further objects to this request to the extent it is duplicative of Request 16. The Court has already ruled on this issue. Subject to the foregoing specific and general objections, Defendant



has produced in this action and/or the U.K. litigation (which Plaintiff already possesses from the trial bundles) all responsive documents in her possession, custody or control, subject to the ruling of the Court.

**18. All Communications between You and Connell Cowan that refer or relate to Your relationship with Mr. Depp, including without limitation any Communications that refer or relate to the Action, the Divorce Action, the U.K. Action, any claims of abuse or violence involving Mr. Depp, and any injuries You contend You suffered as a result of any conduct by Mr. Depp.**

**RESPONSE:**

Defendant objects to this request on the grounds that it is overbroad and unduly burdensome and seeks Information that is not relevant to the claims or defenses in this action and not reasonably calculated to lead to the discovery of admissible evidence. Defendant objects to this request to the extent it seeks confidential medical records and information that are not relevant to this action and/or unreasonably invades upon Defendant's medical privacy rights; Defendant objects to this request to the extent it is duplicative of Requests 16-17. The Court has already ruled on this issue. Subject to the foregoing specific and general objections, Defendant has produced in this action and/or the U.K. litigation (which Plaintiff already possesses from the trial bundles) all responsive documents in her possession, custody or control, subject to the ruling of the Court.

**19. All Communications between You and David Heard that refer or relate to Your relationship with Mr. Depp, including without limitation any Communications that refer or relate to the Action, the Divorce Action, the U.K. Action, any claims of abuse or violence involving Mr. Depp, and any injuries You contend You suffered as a result of any conduct by Mr. Depp.**

**RESPONSE:**

Defendant objects to this request on the grounds that it is overbroad and unduly burdensome and seeks information that is not relevant to the claims or defenses in this action and not reasonably calculated to lead to the discovery of admissible evidence. Defendant further

objects to this request to the extent it seeks information that is already available to and equally accessible to Plaintiff. Defendant objects to this request to the extent it seeks privileged information protected from disclosure, including information protected by the attorney-client privilege or work product doctrine and any other applicable privilege, immunity or protection. Subject to the foregoing specific and general objections, Defendant has produced in this action and/or the U.K. litigation (which Plaintiff already possesses from the trial bundles) all non-privileged documents that are identified by a reasonable search that refer or relate to the claims and defenses in this case.

**20. All Communications between You and Paige Heard that refer or relate to Your relationship with Mr. Depp, including without limitation any Communications that refer or relate to the Action, the Divorce Action, the U.K. Action, any claims of abuse or violence involving Mr. Depp, and any injuries You contend You suffered as a result of any conduct by Mr. Depp.**

**RESPONSE:**

Defendant objects to this request on the grounds that it is overbroad and unduly burdensome and seeks information that is not relevant to the claims or defenses in this action and not reasonably calculated to lead to the discovery of admissible evidence. Defendant further objects to this request to the extent it seeks information that is already available to and equally accessible to Plaintiff. Defendant objects to this request to the extent it seeks privileged information protected from disclosure, including information protected by the attorney-client privilege or work product doctrine and any other applicable privilege, immunity or protection. Subject to the foregoing specific and general objections, Defendant has produced in this action and/or the U.K. litigation (which Plaintiff already possesses from the trial bundles) all non-privileged documents that are identified by a reasonable search that refer or relate to the claims and defenses in this case.

**21. All Communications between You and Debbie Lloyd that refer or relate to Your relationship with Mr. Depp, including without limitation any Communications that refer or relate to the Action, the Divorce Action, the U.K. Action, any claims of abuse or violence involving Mr. Depp, and any injuries You contend You suffered as a result of any conduct by Mr. Depp.**

**RESPONSE:**

Defendant objects to this request on the grounds that it is overbroad and unduly burdensome and seeks information that is not relevant to the claims or defenses in this action and not reasonably calculated to lead to the discovery of admissible evidence. Defendant objects to this request to the extent it seeks confidential medical records and information that are not relevant to this action and/or unreasonably invades upon Defendant's medical privacy rights. Subject to the foregoing specific and general objections, Defendant has produced in this action and/or the U.K. litigation (which Plaintiff already possesses from the trial bundles) all non-privileged documents that are identified by a reasonable search that refer or relate to the claims and defenses in this case.

**22. All Communications between You and Tasya van Ree that refer or relate to Your relationship with Mr. Depp, including without limitation any Communications that refer or relate to the Action, the Divorce Action, the U.K. Action, any claims of abuse or violence involving Mr. Depp, and any injuries You contend You suffered as a result of any conduct by Mr. Depp.**

**RESPONSE:**

Defendant objects to this request on the grounds that it is overbroad and unduly burdensome and seeks information that is not relevant to the claims or defenses in this action and not reasonably calculated to lead to the discovery of admissible evidence. Defendant further objects to this request to the extent it seeks information that is already available to and equally accessible to Plaintiff. Defendant objects to this request to the extent it seeks privileged information protected from disclosure, including information protected by the attorney-client

privilege or work product doctrine and any other applicable privilege, immunity or protection. Subject to the foregoing specific and general objections, Defendant has produced in this action and/or the U.K. litigation (which Plaintiff already possesses from the trial bundles) all non-privileged documents that are identified by a reasonable search that refer or relate to the claims and defenses in this case.

**23. All Communications between You and Erin Boerum that refer or relate to Your relationship with Mr. Depp, including without limitation any Communications that refer or relate to the Action, the Divorce Action, the U.K. Action, any claims of abuse or violence involving Mr. Depp, and any injuries You contend You suffered as a result of any conduct by Mr. Depp.**

**RESPONSE:**

Defendant objects to this request on the grounds that it is overbroad and unduly burdensome and seeks information that is not relevant to the claims or defenses in this action and not reasonably calculated to lead to the discovery of admissible evidence. Defendant further objects to this request to the extent it seeks information that is already available to and equally accessible to Plaintiff. Defendant objects to this request to the extent it seeks privileged information protected from disclosure, including information protected by the attorney-client privilege or work product doctrine and any other applicable privilege, immunity or protection. Subject to the foregoing specific and general objections, Defendant has produced in this action and/or the U.K. litigation (which Plaintiff already possesses from the trial bundles) all non-privileged documents that are identified by a reasonable search that refer or relate to the claims and defenses in this case.

**24. All Communications between You and Jessica Weitz that refer or relate to Your relationship with Mr. Depp, including without limitation any Communications that refer or relate to the Action, the Divorce Action, the U.K. Action, any claims of abuse or violence involving Mr. Depp, and any injuries You contend You suffered as a result of any conduct by Mr. Depp.**

**RESPONSE:**

Defendant objects to this request on the grounds that it is overbroad and unduly burdensome and seeks information that is not relevant to the claims or defenses in this action and not reasonably calculated to lead to the discovery of admissible evidence. Defendant further objects to this request to the extent it seeks information that is already available to and equally accessible to Plaintiff. Defendant objects to this request to the extent it seeks privileged information protected from disclosure, including information protected by the attorney-client privilege or work product doctrine and any other applicable privilege, immunity or protection. Subject to the foregoing specific and general objections, Defendant has produced in this action and/or the U.K. litigation (which Plaintiff already possesses from the trial bundles) all non-privileged documents and will produce any further that are identified by a reasonable search that refer or relate to the claims and defenses in this case.

**25. All Communications between You and Kevin Murphy that refer or relate to Your relationship with Mr. Depp, including without limitation any Communications that refer or relate to the Action, the Divorce Action, the U.K. Action, any claims of abuse or violence involving Mr. Depp, and any injuries You contend You suffered as a result of any conduct by Mr. Depp.**

**RESPONSE:**

Defendant objects to this request on the grounds that it is overbroad and unduly burdensome and seeks information that is not relevant to the claims or defenses in this action and not reasonably calculated to lead to the discovery of admissible evidence. Defendant further objects to this request to the extent it seeks information that is already available to and equally

accessible to Plaintiff. The Court has already ruled on this issue. Subject to the foregoing specific and general objections, Defendant has produced in this action and/or the U.K. litigation (which Plaintiff already possesses from the trial bundles) all non-privileged documents that are identified by a reasonable search that refer or relate to the claims and defenses in this case.

**26. All Communications between You and Laura Divenere that refer or relate to Your relationship with Mr. Depp, including without limitation any Communications that refer or relate to the Action, the Divorce Action, the U.K. Action, any claims of abuse or violence involving Mr. Depp, and any injuries You contend You suffered as a result of any conduct by Mr. Depp.**

**RESPONSE:**

Defendant objects to this request on the grounds that it is overbroad and unduly burdensome and seeks information that is not relevant to the claims or defenses in this action and not reasonably calculated to lead to the discovery of admissible evidence. Defendant further objects to this request to the extent it seeks information that is already available to and equally accessible to Plaintiff. Defendant objects to this request to the extent it seeks privileged information protected from disclosure, including information protected by the attorney-client privilege or work product doctrine and any other applicable privilege, immunity or protection. The Court has already ruled on this issue. Subject to the foregoing specific and general objections, Defendant has produced in this action and/or the U.K. litigation (which Plaintiff already possesses from the trial bundles) all non-privileged documents that are identified by a reasonable search that refer or relate to the claims and defenses in this case.

**27. All Communications between You and Kristina Sexton that refer or relate to Your relationship with Mr. Depp, including without limitation any Communications that refer or relate to the Action, the Divorce Action, the U.K. Action; any claims of abuse or violence involving Mr. Depp, and any injuries You contend You suffered as a result of any conduct by Mr. Depp.**

**RESPONSE:**

Defendant objects to this request on the grounds that it is overbroad and unduly burdensome and seeks information that is not relevant to the claims or defenses in this action and not reasonably calculated to lead to the discovery of admissible evidence. Defendant further objects to this request to the extent it seeks information that is already available to and equally accessible to Plaintiff. Defendant objects to this request to the extent it seeks privileged information protected from disclosure, including information protected by the attorney-client privilege or work product doctrine and any other applicable privilege, immunity or protection. The Court has already ruled on this issue. Subject to the foregoing specific and general objections, Defendant has produced in this action and/or the U.K. litigation (which Plaintiff already possesses from the trial bundles) all non-privileged documents that are identified by a reasonable search that refer or relate to the claims and defenses in this case.

**28. All Communications between You and Bonnie Jacobs that refer or relate to Your relationship with Mr. Depp, including without limitation any Communications that refer or relate to the Action, the Divorce Action, the U.K. Action, any claims of abuse or violence involving Mr. Depp, and any injuries You contend You suffered as a result of any conduct by Mr. Depp.**

**RESPONSE:**

Defendant objects to this request on the grounds that it is overbroad and unduly burdensome and seeks information that is not relevant to the claims or defenses in this action and not reasonably calculated to lead to the discovery of admissible evidence. Defendant objects to this request to the extent it seeks confidential medical records and information that are not relevant to this action and/or unreasonably invades upon Defendant's medical privacy rights. The Court has already ruled on this issue. Subject to the foregoing specific and general objections, Defendant has produced in this action and/or the U.K. litigation (which Plaintiff already possesses from the

trial bundles) all responsive documents in her possession, custody or control, subject to the ruling of the Court.

**29. All Documents that evidence or reflect any treatment You have received from Bonnie Jacobs in connection with Your relationship with Mr. Depp.**

**RESPONSE:**

Defendant objects to this request on the grounds that it is overbroad and unduly burdensome and seeks Information that is not relevant to the claims or defenses in this action and not reasonably calculated to lead to the discovery of admissible evidence. Defendant objects to this request to the extent it seeks confidential medical records and information that are not relevant to this action and/or unreasonably invades upon Defendant's medical privacy rights. Defendant objects to this request to the extent it is duplicative of Requests 28. The Court has already ruled on this issue. Subject to the foregoing specific and general objections, Defendant has produced in this action and/or the U.K. litigation (which Plaintiff already possesses from the trial bundles) all responsive documents in her possession, custody or control, subject to the ruling of the Court.

**30. All Communications between You and Laurel Anderson that refer or relate to Your relationship with Mr. Depp, including without limitation any Communications that refer or relate to the Action, the Divorce Action, the U.K. Action, any claims of abuse or violence involving Mr. Depp, and any injuries You contend You suffered as a result of any conduct by Mr. Depp.**

**RESPONSE:**

Defendant objects to this request on the grounds that it is overbroad and unduly burdensome and seeks Information that is not relevant to the claims or defenses in this action and not reasonably calculated to lead to the discovery of admissible evidence. Defendant objects to this request to the extent it seeks confidential medical records and information that are not relevant to this action and/or unreasonably invades upon Defendant's medical privacy rights. The Court has already ruled on this issue. Subject to the foregoing specific and general objections, Defendant



has produced in this action and/or the U.K. litigation (which Plaintiff already possesses from the trial bundles) all responsive documents in her possession, custody or control, subject to the ruling of the Court.

**31. All Documents that evidence or reflect any treatment You have received from Laurel Anderson in connection with Your relationship with Mr. Depp.**

**RESPONSE:**

Defendant objects to this request on the grounds that it is overbroad and unduly burdensome and seeks Information that is not relevant to the claims or defenses in this action and not reasonably calculated to lead to the discovery of admissible evidence. Defendant objects to this request to the extent it seeks confidential medical records and information that are not relevant to this action and/or unreasonably invades upon Defendant's medical privacy rights. Defendant objects to this request to the extent it is duplicative of Requests 30. The Court has already ruled on this issue. Subject to the foregoing specific and general objections, Defendant has produced in this action and/or the U.K. litigation (which Plaintiff already possesses from the trial bundles) all responsive documents in her possession, custody or control, subject to the ruling of the Court.

**32. All Communications between You and Amy Banks that refer or relate to Your relationship with Mr. Depp, including without limitation any Communications that refer or relate to the Action, the Divorce Action, the U.K. Action, any claims of abuse or violence involving Mr. Depp, and any injuries You contend You suffered as a result of any conduct by Mr. Depp.**

**RESPONSE:**

Defendant objects to this request on the grounds that it is overbroad and unduly burdensome and seeks Information that is not relevant to the claims or defenses in this action and not reasonably calculated to lead to the discovery of admissible evidence. Defendant objects to this request to the extent it seeks confidential medical records and information that are not relevant to this action and/or unreasonably invades upon Defendant's medical privacy rights. The Court

has already ruled on this issue. Subject to the foregoing specific and general objections, Defendant has produced in this action and/or the U.K. litigation (which Plaintiff already possesses from the trial bundles) all responsive documents in her possession, custody or control, subject to the ruling of the Court.

**33. All Documents that evidence or reflect any treatment You have received from Amy Banks in connection with Your relationship with Mr. Depp.**

**RESPONSE:**

Defendant objects to this request on the grounds that it is overbroad and unduly burdensome and seeks Information that is not relevant to the claims or defenses in this action and not reasonably calculated to lead to the discovery of admissible evidence. Defendant objects to this request to the extent it seeks confidential medical records and information that are not relevant to this action and/or unreasonably invades upon Defendant's medical privacy rights. Defendant objects to this request to the extent it is duplicative of Requests 32. The Court has already ruled on this issue. Subject to the foregoing specific and general objections, Defendant has produced in this action and/or the U.K. litigation (which Plaintiff already possesses from the trial bundles) all responsive documents in her possession, custody or control, subject to the ruling of the Court.

**34. All Communications between You and Joseph Sugerman that refer or relate to Your relationship with Mr. Depp, including without limitation any Communications that refer or relate to the Action, the Divorce Action, the U.K. Action, any claims of abuse or violence involving Mr. Depp, and any injuries You contend You suffered as a result of any conduct by Mr. Depp.**

**RESPONSE:**

Defendant objects to this request on the grounds that it is overbroad and unduly burdensome and seeks Information that is not relevant to the claims or defenses in this action and not reasonably calculated to lead to the discovery of admissible evidence. Defendant objects to this request to the extent it seeks confidential medical records and information that are not relevant

to this action and/or unreasonably invades upon Defendant's medical privacy rights. The Court has already ruled on this issue. Subject to the foregoing specific and general objections, Defendant has produced in this action and/or the U.K. litigation (which Plaintiff already possesses from the trial bundles) all responsive documents in her possession, custody or control, subject to the ruling of the Court.

**35. All Documents that evidence or reflect any treatment You have received from Joseph Sugerman in connection with Your relationship with Mr. Depp.**

**RESPONSE:**

Defendant objects to this request on the grounds that it is overbroad and unduly burdensome and seeks Information that is not relevant to the claims or defenses in this action and not reasonably calculated to lead to the discovery of admissible evidence. Defendant objects to this request to the extent it seeks confidential medical records and information that are not relevant to this action and/or unreasonably invades upon Defendant's medical privacy rights. Defendant objects to this request to the extent it is duplicative of Requests 34. The Court has already ruled on this issue. Subject to the foregoing specific and general objections, Defendant has produced in this action and/or the U.K. litigation (which Plaintiff already possesses from the trial bundles) all responsive documents in her possession, custody or control, subject to the ruling of the Court.

**36. All Communications between You and David Kipper that refer or relate to Your relationship with Mr. Depp, including without limitation any Communications that refer or relate to the Action, the Divorce Action, the U.K. Action, any claims of abuse or violence involving Mr. Depp, and any injuries You contend You suffered as a result of any conduct by Mr. Depp.**

**RESPONSE:**

Defendant objects to this request on the grounds that it is overbroad and unduly burdensome and seeks Information that is not relevant to the claims or defenses in this action and not reasonably calculated to lead to the discovery of admissible evidence. Defendant objects to

this request to the extent it seeks confidential medical records and information that are not relevant to this action and/or unreasonably invades upon Defendant's medical privacy rights. The Court has already ruled on this issue. Subject to the foregoing specific and general objections, Defendant has produced in this action and/or the U.K. litigation (which Plaintiff already possesses from the trial bundles) all responsive documents in her possession, custody or control, subject to the ruling of the Court.

**37. All Documents that evidence or reflect any treatment You have received from David Kipper in connection with Your relationship with Mr. Depp.**

**RESPONSE:**

Defendant objects to this request on the grounds that it is overbroad and unduly burdensome and seeks Information that is not relevant to the claims or defenses in this action and not reasonably calculated to lead to the discovery of admissible evidence. Defendant objects to this request to the extent it seeks confidential medical records and information that are not relevant to this action and/or unreasonably invades upon Defendant's medical privacy rights. Defendant objects to this request to the extent it is duplicative of Requests 36. The Court has already ruled on this issue. Subject to the foregoing specific and general objections, Defendant has produced in this action and/or the U.K. litigation (which Plaintiff already possesses from the trial bundles) all responsive documents in her possession, custody or control, subject to the ruling of the Court.

**38. All Communications between You and Lisa Beane that refer or relate to Your relationship with Mr. Depp, including without limitation any Communications that refer or relate to the Action, the Divorce Action, the U.K. Action, any claims of abuse or violence involving Mr. Depp, and any injuries You contend You suffered as a result of any conduct by Mr. Depp.**

**RESPONSE:**

Defendant objects to this request on the grounds that it is overbroad and unduly burdensome and seeks Information that is not relevant to the claims or defenses in this action and

not reasonably calculated to lead to the discovery of admissible evidence. Defendant objects to this request to the extent it seeks confidential medical records and information that are not relevant to this action and/or unreasonably invades upon Defendant's medical privacy rights. Subject to the foregoing specific and general objections, Defendant has produced in this action and/or the U.K. litigation (which Plaintiff already possesses from the trial bundles) non-privileged responsive documents and will produce any additional, non-privileged documents that are identified by a reasonable search that refer or relate to the claims and defenses in this case.

**39. All Communications between You and Leonard Damian that refer or relate to Your relationship with Mr. Depp, including without limitation any Communications that refer or relate to the Action, the Divorce Action, the U.K. Action, any claims of abuse or violence involving Mr. Depp, and any injuries You contend You suffered as a result of any conduct by Mr. Depp.**

**RESPONSE:**

Defendant objects to this request on the grounds that it is overbroad and unduly burdensome and seeks information that is not relevant to the claims or defenses in this action and not reasonably calculated to lead to the discovery of admissible evidence. Defendant further objects to this request to the extent it seeks information that is already available to and equally accessible to Plaintiff. Defendant objects to this request to the extent it seeks privileged information protected from disclosure, including information protected by the attorney-client privilege or work product doctrine and any other applicable privilege, immunity or protection. Subject to the foregoing specific and general objections, Defendant has produced in this action and/or the U.K. litigation (which Plaintiff already possesses from the trial bundles) non-privileged responsive documents and will produce any additional, non-privileged documents that are identified by a reasonable search that refer or relate to the claims and defenses in this case.

**40. All Communications between You and Melanie Inglessis that refer or relate to Your relationship with Mr. Depp, including without limitation any Communications that**

**refer or relate to the Action, the Divorce Action, the U.K. Action, any claims of abuse or violence involving Mr. Depp, and any injuries You contend You suffered as a result of any conduct by Mr. Depp.**

**RESPONSE:**

Defendant objects to this request on the grounds that it is overbroad and unduly burdensome and seeks Information that is not relevant to the claims or defenses in this action and not reasonably calculated to lead to the discovery of admissible evidence. Defendant further objects to this request to the extent it seeks information that is already available to and equally accessible to Plaintiff. Defendant objects to this request to the extent it seeks privileged information protected from disclosure, including information protected by the attorney-client privilege or work product doctrine and any other applicable privilege, immunity or protection. Subject to the foregoing specific and general objections, Defendant has produced in this action and/or the U.K. litigation (which Plaintiff already possesses from the trial bundles) non-privileged responsive documents and will produce any additional, non-privileged documents that are identified by a reasonable search that refer or relate to the claims and defenses in this case.

41. All Communications between You and Rami Sarabi that refer or relate to Your relationship with Mr. Depp, including without limitation any Communications that refer or relate to the Action, the Divorce Action, the U.K. Action, any claims of abuse or violence involving Mr. Depp, and any injuries You contend You suffered as a result of any conduct by Mr. Depp.

**RESPONSE:**

Defendant objects to this request on the grounds that it is overbroad and unduly burdensome and seeks Information that is not relevant to the claims or defenses in this action and not reasonably calculated to lead to the discovery of admissible evidence. Defendant further objects to this request to the extent it seeks information that is already available to and equally accessible to Plaintiff. Defendant objects to this request to the extent it seeks privileged information protected from disclosure, including information protected by the attorney-client privilege or work product doctrine and any other applicable privilege, immunity or protection. Subject to the foregoing specific and general objections, Defendant has produced in this action and/or the U.K. litigation (which Plaintiff already possesses from the trial bundles) non-privileged responsive documents and will produce any additional, non-privileged documents that are identified by a reasonable search that refer or relate to the claims and defenses in this case.

42. All Communications between You and Bianca Butti that refer or relate to Your relationship with Mr. Depp, including without limitation any Communications that refer or relate to the Action, the Divorce Action, the U.K. Action, any claims of abuse or violence involving Mr. Depp, and any injuries You contend You suffered as a result of any conduct by Mr. Depp.

**RESPONSE:**

Defendant objects to this request on the grounds that it is overbroad and unduly burdensome because it seeks information that is not relevant to the claims or defenses in this action and not reasonably calculated to lead to the discovery of admissible evidence. Defendant objects to this request to the extent it seeks privileged information protected from disclosure, including

information protected by the attorney-client privilege or work product doctrine and any other applicable privilege, immunity or protection.

Notwithstanding any non-privileged, responsive documents Defendant may have produced in this action and/or the U.K. litigation (which Plaintiff already possesses from the trial bundles), Defendant stands on the objections.

**43. All Communications between You and any other Person that refer or relate to Your relationship with Mr. Depp, including without limitation any Communications that refer or relate to the Action, the Divorce Action, the U.K. Action, any claims of abuse or violence involving Mr. Depp, and any injuries You contend You suffered as a result of any conduct by Mr. Depp.**

**RESPONSE:**

Defendant objects to this request on the grounds that it is overbroad and unduly burdensome because it seeks information that is not relevant to the claims or defenses in this action and not reasonably calculated to lead to the discovery of admissible evidence. Defendant further objects to this request to the extent it seeks information that is already available to and equally accessible to Plaintiff. Defendant objects to this request to the extent it seeks privileged information protected from disclosure, including information protected by the attorney-client privilege or work product doctrine and any other applicable privilege, immunity or protection.

Notwithstanding any non-privileged, responsive documents Defendant may have produced in this action and/or the U.K. litigation (which Plaintiff already possesses from the trial bundles), Defendant stands on the objections.

**44. All Documents that evidence or reflect any donations made by You of any settlement payments made to You by Mr. Depp in connection with the Divorce Action.**

**RESPONSE:**



Defendant objects to this request on the grounds that it seeks information that is irrelevant and not reasonably calculated to lead to the discovery of admissible evidence. The information sought herein simply has no bearing on the claims or defenses at issue and establishes a bad precedent for the confidentiality of donations.

Notwithstanding any non-privileged, responsive documents Defendant may have produced in this action and/or the U.K. litigation (which Plaintiff already possesses from the trial bundles), Defendant stands on the objections.

**45. Documents sufficient to identify any and all entities to which You made any donations from any settlement payments made to You by Mr. Depp in connection with the Divorce Action, and the amount(s) of any such donation(s).**

**RESPONSE:**

Defendant objects to this request on the grounds that it seeks information that is irrelevant and not reasonably calculated to lead to the discovery of admissible evidence. The information sought herein simply has no bearing on the claims or defenses at issue.

Notwithstanding any non-privileged, responsive documents Defendant may have produced in this action and/or the U.K. litigation (which Plaintiff already possesses from the trial bundles), Defendant stands on the objections.

**46. All Documents that evidence or reflect what You did with all funds You received in connection with any settlement payments made to You by Mr. Depp in connection with the Divorce Action.**

**RESPONSE:**

Defendant objects to this request on the grounds that it seeks information that is irrelevant and not reasonably calculated to lead to the discovery of admissible evidence. The information sought herein simply has no bearing on the claims or defenses at issue.

Notwithstanding any non-privileged, responsive documents Defendant may have produced in this action and/or the U.K. litigation (which Plaintiff already possesses from the trial bundles), Defendant stands on the objections.

**47. All Documents that contain, constitute, refer, reflect, or relate to any and all Communications between You and any other Person regarding any donations made by You from any settlement payments made to You by Mr. Depp.**

**RESPONSE:**

Defendant objects to this request on the grounds that it seeks information that is irrelevant and not reasonably calculated to lead to the discovery of admissible evidence. The information sought herein simply has no bearing on the claims or defenses at issue.

Notwithstanding any non-privileged, responsive documents Defendant may have produced in this action and/or the U.K. litigation (which Plaintiff already possesses from the trial bundles), Defendant stands on the objections.

**48. All Documents that contain, constitute, refer, reflect, or relate to any and all Communications between You and any other Person regarding the Divorce Action or the settlement thereof.**

**RESPONSE:**

Defendant objects to this request on the grounds that it is overbroad and unduly burdensome because it seeks information that is not relevant to the claims or defenses in this action and not reasonably calculated to lead to the discovery of admissible evidence. Defendant further objects to this request to the extent it seeks information that is already available to and equally accessible to Plaintiff. Defendant objects to this request to the extent it seeks privileged information protected from disclosure, including information protected by the attorney-client privilege or work product doctrine and any other applicable privilege, immunity or protection. Subject to the foregoing specific and general objections, Defendant has produced in this action

and/or the U.K. litigation (which Plaintiff already possesses from the trial bundles) responsive documents and will produce any additional, non-privileged documents that are identified by a reasonable search that refer or relate to the claims and defenses in this case.

**49. All Documents that contain, constitute, refer, reflect, or relate to any and all Communications between You, or anyone acting on Your behalf, on the one hand, and any other Person, on the other hand, regarding the UK Action.**

**RESPONSE:**

Defendant objects to this request on the grounds that it is overbroad and unduly burdensome because it seeks information that is not relevant to the claims or defenses in this action and not reasonably calculated to lead to the discovery of admissible evidence. Defendant further objects to this request to the extent it seeks information that is already available to and equally accessible to Plaintiff. Defendant objects to this request to the extent it seeks privileged information protected from disclosure, including information protected by the attorney-client privilege or work product doctrine and any other applicable privilege, immunity or protection. Subject to the foregoing specific and general objections, Defendant has produced in this action and/or the U.K. litigation (which Plaintiff already possesses from the trial bundles) responsive documents and will produce any additional, non-privileged documents that are identified by a reasonable search that refer or relate to the claims and defenses in this case.

**50. All Documents that contain, constitute, refer, reflect, or relate to any and all Communications between You, or anyone acting on Your behalf, on the one hand, and NGN, or any person acting on NGN's behalf, on the other hand, regarding the UK Action, Mr. Depp, the relationship between You and Mr. Depp, the Divorce Action, and/or the subject matter of this action.**

**RESPONSE:**

Defendant objects to this request on the grounds that it is overbroad and unduly burdensome, and because the information sought is neither relevant to any issue in this litigation, nor reasonably calculated to lead to the discovery of admissible evidence. Defendant also objects to this request on the grounds that it seeks information that is protected by the joint and/or common interest privilege.

Notwithstanding any non-privileged, responsive documents Defendant may have produced in this action and/or the U.K. litigation (which Plaintiff already possesses from the trial bundles), Defendant stands on the objections.

**51. All Documents, including all Communications, that refer, reflect, or relate to the UK Action.**

**RESPONSE:**

Defendant objects to this request on the grounds that it is overbroad and unduly burdensome, and because the information sought is neither relevant to any issue in this litigation, nor reasonably calculated to lead to the discovery of admissible evidence. Defendant further objects to this request to the extent it seeks information that is already available to and equally accessible to Plaintiff. Defendant objects to this request to the extent it seeks privileged information protected from disclosure, including information protected by the attorney-client privilege or work product doctrine and any other applicable privilege, immunity or protection.

Notwithstanding any non-privileged, responsive documents Defendant may have produced in this action and/or the U.K. litigation (which Plaintiff already possesses from the trial bundles), Defendant stands on the objections.

**52. All Documents, including all Communications, that refer, reflect, or relate to Your relationship with Mr. Depp.**

**RESPONSE:**

Defendant objects to this request on the grounds that it is overbroad and unduly burdensome and not reasonably calculated to lead to the discovery of admissible evidence. Defendant further objects to this request to the extent it seeks information that is already available to and equally accessible to Plaintiff. Defendant objects to this request to the extent it seeks privileged information protected from disclosure, including information protected by the attorney-client privilege or work product doctrine and any other applicable privilege, immunity or protection.

Notwithstanding any non-privileged, responsive documents Defendant may have produced in this action and/or the U.K. litigation (which Plaintiff already possesses from the trial bundles), Defendant stands on the objections.

**53. All Communications between You or anyone acting on Your behalf, on the one hand, and any member of the news media, on the other hand, that refer, reflect, or relate to Your relationship with Mr. Depp, this Action, Divorce Action, the U.K. Action, or the subject matter of any of the same.**

**RESPONSE:**

Defendant objects to this request on the grounds that it is overbroad and unduly burdensome and not reasonably calculated to lead to the discovery of admissible evidence. Defendant further objects to this request to the extent it seeks information that is already available to and equally accessible to Plaintiff. Defendant objects to this request to the extent it seeks privileged information protected from disclosure, including information protected by the attorney-client privilege or work product doctrine and any other applicable privilege, immunity or protection.

Notwithstanding any non-privileged, responsive documents Defendant may have produced in this action and/or the U.K. litigation (which Plaintiff already possesses from the trial bundles), Defendant stands on the objections.

**54. All Documents, including all drafts, that refer, reflect, or relate to any Communications between You or anyone acting on Your behalf, on the one hand, and any member of the news media, on the other hand, regarding Your relationship with Mr. Depp, this Action, Divorce Action, the U.K. Action, or the subject matter of any of the same.**

**RESPONSE:**

Defendant objects to this request on the grounds that it is overbroad and unduly burdensome and not reasonably calculated to lead to the discovery of admissible evidence. Defendant further objects to this request to the extent it seeks information that is already available to and equally accessible to Plaintiff. Defendant objects to this request to the extent it seeks privileged information protected from disclosure, including information protected by the attorney-client privilege or work product doctrine and any other applicable privilege, immunity or protection.

Notwithstanding any non-privileged, responsive documents Defendant may have produced in this action and/or the U.K. litigation (which Plaintiff already possesses from the trial bundles), Defendant stands on the objections.

September 4, 2020

AS TO OBJECTIONS:



Elaine Charlson Bredehoff (VSB No. 23766)  
Adam S. Nadelhaft (VSB No. 91717)  
David E. Murphy (VSB No. 90938)  
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*Counsel to Defendant Amber Laura Heard*

CERTIFICATE OF SERVICE

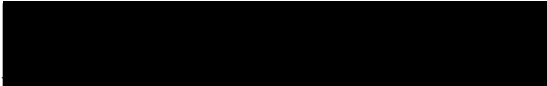
I hereby certify that a true and correct copy of the foregoing was served this 4<sup>th</sup> day of September 2020, by email, by agreement of the parties, addressed as follows:

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Andrew C. Crawford, Esq.  
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# **Exhibit 3**

**VIRGINIA:**

**IN THE CIRCUIT COURT OF FAIRFAX COUNTY**

JOHN C. DEPP, II

Plaintiff,

v.

AMBER LAURA HEARD

Defendant.

Civil Action No.: CL-2019-0002911

**DEFENDANT AMBER LAURA HEARD'S RESPONSES AND OBJECTIONS TO  
PLAINTIFF'S SECOND SET OF INTERROGATORIES**

Pursuant to Rule 4:8 of the Rules of the Supreme Court of Virginia ("Rules"), Defendant Amber Laura Heard, by and through her attorneys, submits these responses and objections (the "Responses") to Plaintiff John C. Depp's Second Set of Interrogatories dated November 4, 2019 (the "Interrogatories").

**GENERAL OBJECTIONS**

The following general objections and responses (the "General Objections") are incorporated into each specific objection and response (the "Specific Objections") as if fully set forth therein:

1. Defendant objects to the Interrogatories to the extent they are duplicative, cumulative, or seek information that has been or will be provided through other means of discovery.
2. Defendant objects to the Interrogatories to the extent they are vague, ambiguous, overly broad, unduly burdensome, seek information not relevant to the claims or defenses of any party, or are not proportional to the needs of the case.

3. Defendant objects to the Interrogatories to the extent they impose any obligations or requirements beyond the scope of the Rules or any case law interpreting them.

4. Defendant's Responses are not intended to be and shall not be construed as an agreement or concurrence that all information provided is admissible with respect to Plaintiff's claims.

5. Defendant objects to each Interrogatory to the extent that it calls for information that: (a) may be derived or ascertained from documents that have been or will be produced in this action; (b) is already in Plaintiff's possession, custody, or control; (c) is publicly available; or (d) is otherwise independently available to Plaintiff or his counsel.

6. Defendant objects to the Interrogatories to the extent they purport to call for documents or information that: (a) are subject to the attorney-client privilege; (b) constitute attorney work product; (c) are protected from disclosure based on common interest or a similar privilege; or (d) are otherwise protected from disclosure under applicable privilege, law, or rule. Defendant will not produce such information in response to the Interrogatories, and any inadvertent production thereof shall not be deemed a waiver of any privilege with respect to such information.

7. Defendant objects to the Interrogatories to the extent they require unreasonable measures to locate and produce responsive information or documents. Defendant will construe the Interrogatories to require a reasonable and diligent search of its reasonably-accessible files where it would reasonably expect to find information, documents, or things related to the Interrogatories, and specifically states that it will limit its search for ESI by use of the agreed and identified search terms and ESI protocol proposed by Defendant.

8. Defendant objects to the Interrogatories to the extent they seek information that is not within Defendant's possession, custody, or control. Subject to this General Objection, in responding to the Interrogatories, Defendant will provide only responsive information within Defendant's possession, custody, or control.

9. Defendant objects to the Definitions and Instructions to the extent they seek to impose obligations greater than those imposed by the Rules or any other applicable law, rule or agreement by the parties.

10. Defendant objects to the Interrogatories to the extent they are based on a false premise and contain express or implied assumptions of fact or law with respect to matters at issue in this case. Defendant's Responses to the Interrogatories are not intended to be and shall not be construed as an agreement or concurrence with Plaintiff's characterization of any facts, circumstances, or legal obligations. Defendant reserves the right to contest any such characterization as inaccurate.

11. Defendant expressly reserves all rights and privileges under the Rules and any other applicable law or rule. The failure to assert such rights and privileges or the inadvertent disclosure by Defendant of information or documents protected by such rights or privileges shall not constitute a waiver thereof, either with respect to these Responses or with respect to any future discovery objections or responses.

12. Defendant's Responses to the Interrogatories are made to the best of her present knowledge, information, and belief. These Responses are at all times subject to such additional or different information that discovery or further investigation may disclose and, while based on the present state of Defendant's knowledge and investigation, are subject to such additional knowledge of facts as may result from Defendant's further discovery or investigation.

**SPECIFIC OBJECTIONS AND RESPONSES**

**INTERROGATORY NO. 1**

**Identify all persons with knowledge, documents, or information concerning any of the claims or defenses in this case, including but not limited to Your or Mr. Depp's alleged: (a) substance abuse; (b) damage of property; (c) acts of violence; (d) abuse in any form of any Romantic Partner; and (e) relationship with each other.**

**RESPONSE TO INTERROGATORY NO. 1**

Defendant objects to Interrogatory No. 1 on the grounds that it is overly broad, unduly burdensome, and seeks information related to Defendant that is not relevant to any party's claims or defenses and is disproportionate to the needs of this case. Defendant further objects to the extent that Interrogatory No. 1 calls for Defendant to speculate as to the scope of someone else's knowledge. Subject to and without waiving the foregoing objections, Defendant identifies the following persons who Defendant believes have non-privileged knowledge or information relevant to the claims and defenses in this case.

Alejandro Romero
Amanda de Cadenet
Andy Milner
Anthony Romero
Ben King
Bobby de Leon
Brandon McCulloch
Brandon Patterson
Bruce Witkin
C.J. Roberts
Christian Carino
Connell Cowan
Cornelius Harrell
David Heard
David Kipper
Debbie Depp

Debbie Lloyd
Doug Stanhope
Elisa "Christi" Dembrowski
Elizabeth Marz
Ellen Barkin
Elon Musk
Erin Boerum
Eugene Arreola
iO Tillett Wright
Isaac Baruch
Jack Whigham
Jacob Bloom
Jerry Judge
Jessica Weitz
Jodi Gottlieb
Joel Mandel
Josh Drew
Keenan Wyatt
Kevin Murphy
Kristina Sexton
Laura Divenere
Lauren Shapiro
Leonard Damian
Lisa Beane
Malcolm Connolly
Melanie Inglessis
Melissa Saenz
Miguel Sanchez
Monroe Tinker
Nathan Holmes
Norman Todd
Paige Heard
Paul Bettany
Rami Sarabi
Raquel Pennington
Robin Baum
Robin Shulman
Sam Sarkar
Samantha McMillen
Savannah McMillan
Sean Bett
Sepher Daghighian
Starling Jenkins
Stephen Deuters
Susan Wiesner

Tara Roberts
Tasya van Ree
Tracey Jacobs
Travis McGivern
Trinity Esparza
Trudy Salven
Tyler Hadden
Whitney Henriquez (formerly Heard)

### **INTERROGATORY NO. 2**

**State whether You or anyone acting on Your behalf, including Your attorneys or investigator(s), have ever taken, received, or assisted in drafting or preparing any declaration, affidavit, or other written statement of any person relating to this lawsuit and/or the factual allegations that are the substance of this suit. If so, please provide the names, current addresses, telephone numbers and occupation of each such person giving such a statement, and the date of each such statement.**

### **RESPONSE TO INTERROGATORY NO. 2**

Defendant objects to Interrogatory No. 2 on the grounds that it seeks information that is subject to one or more privileges, including attorney-client, work product, or common interest privileges. Subject to and without waiving the foregoing objections, Defendant states that she has received the following declarations filed in connection with Plaintiff's and Defendant's divorce proceedings: Raquel Rose Pennington (executed May 27, 2016), iO Tillett Wright (executed June 13, 2016), Samantha Spector (executed May 27, 2016); and Kevin Cohen (executed June 2016). Additional information responsive to this Interrogatory may be contained in Defendant's document productions.

### **INTERROGATORY NO. 3**

**Identify all devices in Your possession, custody, or control in which ESI that relates to the claims or defenses in this case, or is reasonably likely to lead to the discovery of admissible evidence, is or is reasonably likely to be stored. For the avoidance of doubt, include in your response all devices in your possession, custody, or control that are or were owned or used by Mr. Depp.**

### **RESPONSE TO INTERROGATORY NO. 3**

Subject to and without waiving the foregoing objections, Defendant states that ESI that relates to the claims or defenses in this case may reside on the following devices: one cell phone, one iPad, two laptops, and two iCloud accounts. Additional information responsive to this Interrogatory may be contained in Defendant's document productions.

### **INTERROGATORY NO. 4**

**Identify all email addresses, social media accounts, and Chat Applications that You have used to communicate in relation to this Action or the claims and defenses therein.**

### **RESPONSE TO INTERROGATORY NO. 4**

Subject to and without waiving the foregoing objections, Defendant states that she may have used the email addresses [arrowsarc@gmail.com](mailto:arrowsarc@gmail.com) and [readypistol@gmail.com](mailto:readypistol@gmail.com) to communicate in related to this Action or the claims and defenses therein.

### **INTERROGATORY NO. 5**

**Identify each mental and/or physical health care provider (including drug and/or alcohol addiction/dependency care or treatment providers, counselors or therapists) that You saw from January 1, 2010 to the present and state the reason and duration You saw or consulted or received treatment or services from each identified provider. The answer to this Interrogatory should include visits to emergency rooms; and addiction, drug or alcohol treatment or therapy session(s); and visits with or physical or mental health treatment from any doctor, surgeon, psychiatrist, nurse, psychologist, therapist, counselor, medical advisor, specialist, or other provider.**

### **RESPONSE TO INTERROGATORY NO. 5**

Defendant objects to Interrogatory No. 5 on the grounds that Defendant is not alleged to have any alcohol, addiction or dependency issue or treatment that are in dispute in this action, and therefore, Plaintiff's request for information related thereto is wholly irrelevant and not likely to lead to the discovery of admissible evidence. Defendant objects to this interrogatory on the



grounds that it is overly broad, unduly burdensome, and seeks information that is not relevant to either party's claims or defenses and is disproportionate to the needs of this case because it is not reasonably limited to treatment for physical and/or mental injuries or conditions Defendant suffered as a result of Mr. Depp's abuse. Defendant further objects to this interrogatory to the extent it calls for disclosure of expert witnesses or testimony prior to Defendant's expert disclosure deadline. Subject to and without waiving the foregoing objections, Defendant identifies the following mental and/or physical health care providers who provided treatment or services relevant to the claims or defenses in this action:

<b>Provider</b>	<b>Treatment Type</b>
Dr. David Kipper	General medicine
Dr. Connell Cowan	Psychotherapy
Dr. Bonnie Jacobs	Psychology
Dr. Laurel Anderson	Psychology
Dr. Amy Banks	Psychology
Dr. Joseph Sugerman	Ears, Nose, and Throat medicine

**INTERROGATORY NO. 6**

**For each prescription drug You have been prescribed to take since 2010 or that you currently take: (a) identify the physician and/or health care provider who wrote the prescription; (b) state the name of the drug and the dosage to be taken; and (c) identify each pharmacist who filled the prescription and such pharmacist's pharmacy and/or place of employment.**

**RESPONSE TO INTERROGATORY NO. 6**

Defendant objects to Interrogatory No. 6 on the grounds that Defendant is not alleged to have any addictions or dependency issues that are in dispute in this action, and therefore, Plaintiff's request for information related thereto is wholly irrelevant and not likely to lead to the discovery

of admissible evidence. Defendant objects to this interrogatory on the grounds that it is overly broad, unduly burdensome, and seeks information that is not relevant to either party's claims or defenses and is disproportionate to the needs of this case because it is not reasonably limited to treatment for injuries or conditions Defendant suffered as a result of Mr. Depp's abuse. Defendant further objects to this interrogatory to the extent it calls for disclosure of expert witnesses or testimony prior to Defendant's expert disclosure deadline. Defendant further objects to Interrogatory No. 6 as requesting information that can be derived or ascertained from documents that have been or will be produced in this action. Subject to and without waiving the foregoing objections, Defendant has and/or will identify and produce medical records relating to relevant treatment or services obtained from the relevant medical providers listed in response to Interrogatory 5. Defendant refers Plaintiff to those productions.

#### **INTERROGATORY NO. 7**

**Identify each Romantic Partner, other than Mr. Depp, that You have had in the past 10 years.**

#### **RESPONSE TO INTERROGATORY NO. 7**

Defendant objects to Interrogatory No. 7 on the grounds that it seeks information that is not relevant to any party's claims or defenses. The issue in dispute is whether or not statements in the Op-ed are defamatory and whether there is an implication therein that Defendant was subject to domestic abuse by Plaintiff. Defendant's relationships with others are not relevant to Plaintiff's domestic abuse of Plaintiff. In light of the foregoing objection, Defendant will not respond to this Interrogatory.

#### **INTERROGATORY NO. 8**

**Describe in detail any separation agreements, settlements, releases, tolling agreements, confidentiality and/or non-disclosure agreements, forbearance agreements, Mary Carter agreements, or any other agreements of any kind which You have negotiated with any**

**Romantic Partner. Your answer should include any such agreements that have been negotiated in order to gain the assistance or compliance of another person and/or entity with regard to this or any other matter.**

**RESPONSE TO INTERROGATORY NO. 8**

Defendant objects to Interrogatory No. 8 to the extent it seeks information related to agreements with any person other than Plaintiff on the grounds that is not relevant to any party's claims or defenses. The issue in dispute is whether or not statements in the Op-ed are defamatory and whether there is an implication therein that Defendant was subject to domestic abuse by Plaintiff. Defendant's relationships and agreements with others are not relevant to Plaintiff's domestic abuse of Defendant. Subject to and without waiving the foregoing objections, Defendant identifies her settlement agreement with Plaintiff. Because Mr. Depp was a party to this settlement, Ms. Heard will not further describe it.

**INTERROGATORY NO. 9**

**Identify and describe facts relating to each instance where any person, other than Mr. Depp, alleged (publicly or privately) that You engaged in any act of physical violence, abuse, or destruction of property at any point in the past 15 years, including (i) the identity of the person(s) that accused You of such conduct; (ii) the person and/or property toward which Your alleged conduct was directed; (iii) whether You were, or were alleged to have been, under the influence of alcohol, medication or illegal drugs at the time of Your alleged conduct; (iv) the date, time and location(s) of each such instance; and (v) the identity of all persons present that the time of the alleged incident.**

**RESPONSE TO INTERROGATORY NO. 9**

Defendant objects to Interrogatory No. 9 on the grounds that it seeks information that is not relevant to any party's claims or defenses. The issue in dispute is whether or not statements in the Op-ed are defamatory and whether there is an implication therein that Defendant was subject to domestic abuse by Plaintiff. Allegations of others related to Defendant, if any, are not relevant to Plaintiff's abuse of Defendant. Defendant further objects on the grounds that Defendant is not alleged to have any alcohol, addiction or dependency issue that are in dispute in this action, and

therefore, Plaintiff's request for information related thereto is wholly irrelevant and not likely to lead to the discovery of admissible evidence. In light of the foregoing objection, Defendant will not respond to this Interrogatory.

#### **INTERROGATORY NO. 10**

**Provide the name address, profession, and qualifications of each expert witness who You intend to call to testify at the trial of this case, including any rebuttal experts and/or experts to address any alleged new matters raised in Plaintiff's designation of experts. For each such expert, state the subject matter in which the expert is expected to testify; the substance of the facts as to which the expert is expected to testify; the substance of the opinions which the expert is expected to give; a summary of the grounds for each such opinion; the terms of the expert's compensation, and attach to Your answers any available list of publications written by the expert and any written report made by the expert concerning the expert's finding and opinions in this matter.**

#### **RESPONSE TO INTERROGATORY NO. 10**

Defendant objects to Interrogatory No. 10 as premature. Defendant is working to identify experts and prepare expert disclosures that will be disclosed to Plaintiff on or before Defendant's expert disclosure deadline.

#### **INTERROGATORY NO. 11**

**Identify each judicial or administrative proceeding (including all details needed to locate the docket) in which You have had any involvement (including as a party, witness, or non party) from January 1, 2010 to the present, and include a description of (i) the nature of each proceeding; (ii) the court in which the proceeding was/is maintained; (iii) Your involvement in the proceeding; (iv) the status of the proceeding; and (v) the result, if the proceeding has concluded.**

#### **RESPONSE TO INTERROGATORY NO. 11**

Defendant objects to Interrogatory No. 11 on the grounds that it is overly broad, unduly burdensome, and seeks information that is not relevant to any party's claims or defenses. Subject to and without waiving the foregoing objections, Defendant identifies her divorce proceeding and subsequent, related litigation with Plaintiff. Because Mr. Depp was a party to these proceedings, Ms. Heard will not provide further description. Defendant further identifies the court proceeding

in Australia relating to Plaintiff's and Defendant's dogs. Because Plaintiff is aware of this proceeding and because it bears no relevance to this matter, Ms. Heard will not further describe it. In addition, Defendant identifies *Nicola Six v. Heard*, a breach of contract suit filed against Ms. Heard in California Superior Court, which was settled, and *Heard v. Stanhope*, a defamation suit filed in Cochise County Superior Court in Arizona, which was dismissed by stipulation.

#### **INTERROGATORY NO. 12**

**Identify all persons You or anyone working on Your behalf has spoken to or communicated with regarding the claims or defenses in this Action, Your Op-Ed, and Your Declaration, including all persons spoken to or communicated with at the Washington Post, ACLU, and Virginia Press Association.**

#### **RESPONSE TO INTERROGATORY NO. 12**

Defendant objects to Interrogatory No. 12 to the extent it is overly broad, unduly burdensome, and seeks information that is not relevant to any party's claims or defenses. Defendant further objects to Interrogatory No. 12 on the grounds that it seeks information that is subject to one or more privileges, including attorney-client, work product, or common interest privileges. Subject to and without waiving the foregoing objections, Defendant incorporates her answer to Interrogatory No. 2 and will conduct a reasonable search for any additional responsive information in her custody and will produce relevant, non-privileged materials, should any exist.

#### **INTERROGATORY NO. 13**

**Identify all persons and entities that are providing You with financial assistance with this Action and/or paying Your legal fees and costs related to this Action.**

#### **RESPONSE TO INTERROGATORY NO. 13**

Defendant objects to Interrogatory No. 13 on the grounds that it seeks information that is not relevant to any party's claims or defenses. In light of the foregoing objection, Defendant will not respond to this Interrogatory at this time.

**CERTIFICATION**

I, Amber Laura Heard, certify under penalty of perjury that the foregoing answers to Plaintiff John C. Depp's Second Set of Interrogatories are true and correct to the best of my knowledge, information and belief. I reserve the right to make any changes in these answers if it should appear at any time that omissions or errors have been made or that additional or more accurate information has been obtained.

  
\_\_\_\_\_  
AMBER LAURA HEARD

Dated this 25th day of November, 2019

Respectfully submitted,

Amber L. Heard

By Counsel:

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John C. Quinn (admitted *pro hac vice*)  
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*Counsel to Defendant Amber Laura Heard*

## CERTIFICATE OF SERVICE

I certify that on this 25<sup>th</sup> day of November 2019, a copy of the foregoing was served by email, upon:

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Elliot J. Weingarten, Esq.  
Andrew C. Crawford, Esq.  
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# **Exhibit 4**

This article is more than 4 years old

## Amber Heard to donate \$7m Depp divorce settlement to charities

**The actor says she plans to split money from the divorce between a charity for sick children and another that will use it to combat violence against women**



Amber Heard and Johnny Depp settled their contentious divorce on Tuesday. Photograph: Suzanne Plunkett/Reuters

### **Elle Hunt and agencies**

Thu 18 Aug 2016 23.11 EDT

Amber Heard is to give her \$7m divorce settlement from Johnny Depp to a charity that supports victims of domestic violence and a children's hospital.

Heard wrote in a statement released on Thursday that the entire settlement would be split between the American Civil Liberties Union (ACLU) and the Children's Hospital Los Angeles, with the ACLU's share of \$3.5m going specifically towards its efforts to combat violence against women.

She and Depp settled their contentious divorce on Tuesday, one day before the actors were scheduled to begin a restraining order hearing that would center on Heard's allegations Depp repeatedly abused her during their marriage.

Depp denied he abused Heard, and his attorney alleged she was making the domestic violence allegations to obtain a more favorable settlement.

Court filings show Heard had initially requested \$50,000 a month in spousal support, which was denied by the judge.

"As described in the restraining order and divorce settlement, money played no role for me personally and never has, except to the extent that I could donate it to charity and, in doing so, hopefully help those less able to defend themselves," Heard wrote.

She added that she planned to support the organizations with future donations.

The executive director of the ACLU, Anthony Romero, issued a statement thanking Heard for her generous support and said she could feel "confident that this gift will help other women live safely and freely".

After Heard filed for divorce in May, many of Depp's famous friends rallied publicly in his support, with the comedian Doug Stanhope accusing Heard of blackmail and the director Terry Gilliam stating she was a "better actress than [he] thought".

In the joint statement announcing the statement released on Tuesday, the former couple acknowledged volatility in their relationship, which began after they met on the set of the 2011 film *The Rum Diary*.

"Our relationship was intensely passionate and at times volatile, but always bound by love," the actors' statement said. "Neither party has made false accusations for financial gain. There was never any intent of physical or emotional harm."

It said that Heard would be donating the proceeds from the divorce to a charity but did not specify that it was to be one supporting victims of domestic violence.

Even in the wake of the settlement, there continues to be back-and-forth between each party's representatives over how the split is portrayed in public.

ABC News's report of the announcement was amended to retract a statement made by Heard's lawyers, Samantha F Spector and Joseph P Koenig, that she had been "vindicated in the court of public opinion".

In a subsequent statement, Spector said that assertion was made without Heard's knowledge or approval and was untrue: "We regret the error and apologize to Johnny Depp."

Heard filed for divorce in May and days later obtained a temporary restraining order, accusing the Pirates of the Caribbean star of hitting her during a fight in their Los Angeles apartment in May.

Heard, who came to court with a bruise on her right cheek below the eye, accused Depp of repeatedly hitting her and throwing a cellphone during the fight.

Police said they responded to the actors' apartment but found no evidence of a crime.

The case has received significant media coverage, propelled by photos, images and even text messages purportedly relating to alleged abuse being leaked to the media.

#### Topics

- Johnny Depp
- Amber Heard
- news

# **Exhibit 5**

Amber Heard donates Johnny Depp divorce settlement to charity: Read her statement in full

The actress will give \$3.5 million to a domestic violence charity and \$3.5million to a children's hospital

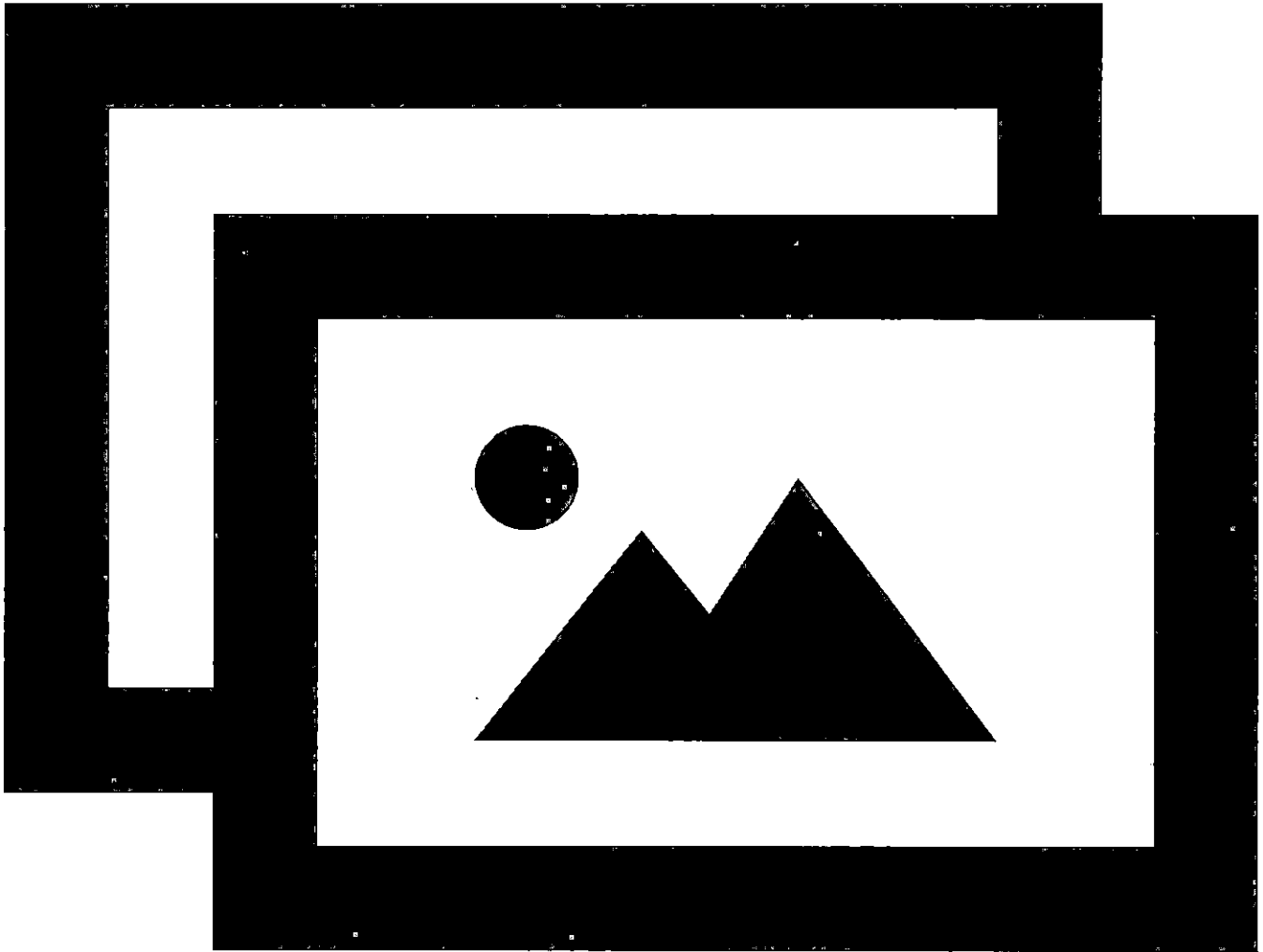


Amber Heard(Getty)

Amber Heard is to donate the settlement from her divorce with Johnny Depp to charity.

The actress and her estranged husband reached a settlement this week after a high-profile split. During the proceedings, Heard accused the *Pirates of the Caribbean* actor of physical and emotional abuse throughout their marriage. Depp has always denied the claims.

In a statement released on Thursday, the 30-year-old said she will donate the entirety of the \$7million (£5.3million) equally between an organisation which supports victims of domestic violence and the Children's Hospital of Los Angeles.



## People news in pictures

[Show all 18](#)



**Read the statement below:**

*"As described in the restraining order and divorce settlement, money played no role for me personally and never has, except to the extent that I could donate it to charity and, in doing so, hopefully help those less able to defend themselves.*

*As reported in the media, the amount received in the divorce was \$7 million and \$7 million is being donated. This is over and above any funds that I have given away in the past and will continue to give away in the future.*

*The donation will be divided equally between the ACLU, with a particular focus to stop violence against women, and the Children's Hospital of Los Angeles, where I have worked as a volunteer for the past 10 years alongside organisations like the Art of Elysium. Over the years, I have seen firsthand how more funding for staffing, better equipment and better medication can make the difference between life or death for a child.*

*I know these organisations will put the funds to good use and look forward to continuing to support them in the future. Hopefully, this experience results in a positive change in the lives of people who need it the most."*

# **Exhibit 6**



Aug 21, 2016, 02:11pm EDT

# Amber Heard Donates Johnny Depp's \$7 Million Divorce Settlement To Charity; Could Face Huge Tax Bill



Tony Nitti Senior Contributor ©  
Taxes

⌚ This article is more than 4 years old.

Actor Johnny Depp and actress Amber Heard recently finalized their divorce after 15 months of marriage, their relationship turning ugly this spring when Heard filed for a temporary restraining order against Depp, alleging he had been both verbally and physically abusive to her throughout their marriage. Reports soon emerged that Heard was seeking \$50,000 a month in alimony, but last week, the two reached a settlement that will have Depp making a one-time payment to Heard of \$7 million.

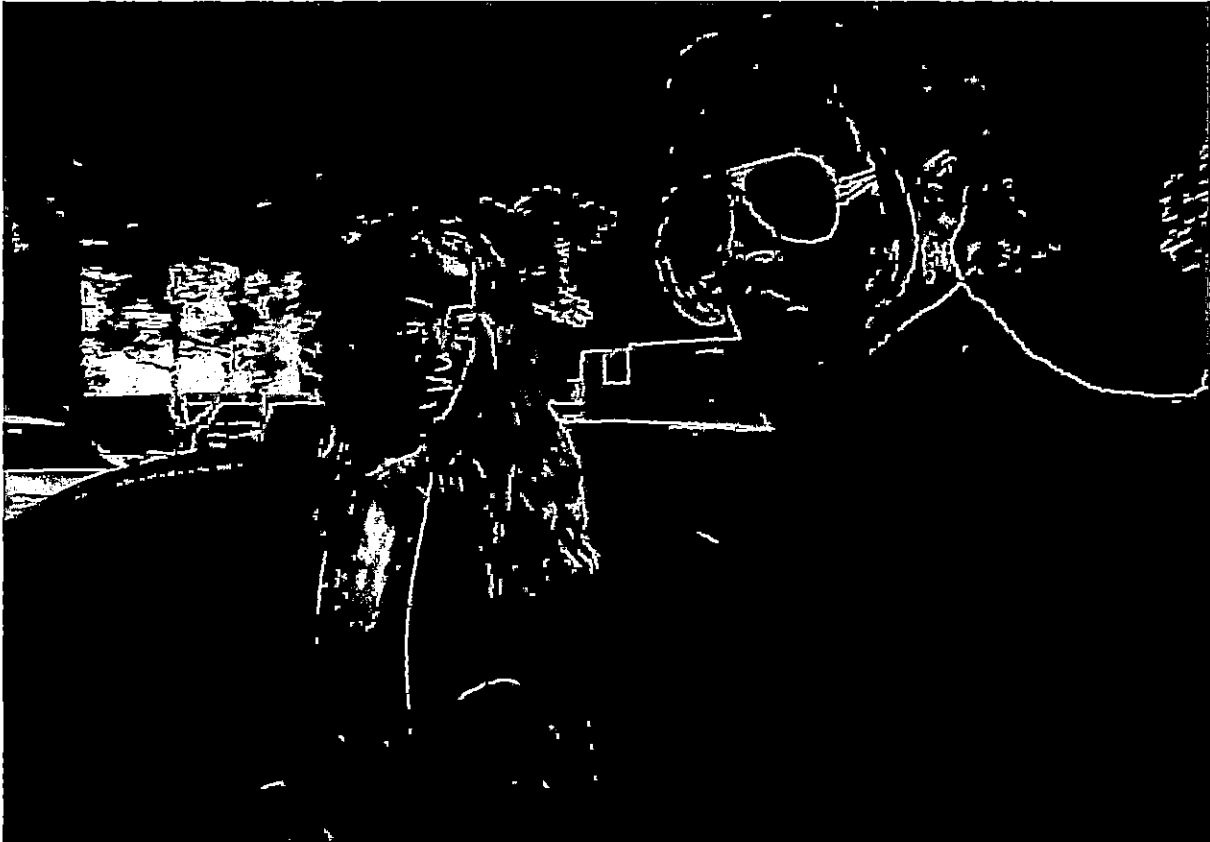
That was not the most newsworthy part of the end of their pairing, however. Heard immediately released a statement explaining that she will contribute the *entire \$7 million to charity*:

"As described in the restraining order and divorce settlement, money played no role for me personally and never has, except to the extent that I could donate it to charity and, in doing so, hopefully help those less able to defend themselves."

To that end, the \$7 million will be split between two charities: the American Civil Liberties Union -- with the money earmarked to prevent violence

against women -- and the Children's Hospital of Los Angeles, with Heard adding, "I know these organizations will put the funds to good use and look forward to continuing to support them in the future. Hopefully, this experience results in a positive change in the lives of people who need it the most."

BETA



Johnny Depp and Amber Heard back on April 18, 2016 arriving at an Australian court hearing over ...  
[+]

While Heard's donation of her settlement payment is undeniably admirable, depending on the way the settlement was structured, it may well yield an untenable tax situation.

Generally, payments from one spouse to another "incident to a divorce" are tax-free to the recipient under Section 1041 of the Internal Revenue Code. Property is transferred incident to a divorce if the transfer occurs within one year of the end of the marriage or is related to the cessation of the marriage. Payments made under Section 1041 are generally treated as a gift, meaning neither the transferor spouse nor transferee spouse recognize gain, loss, income or deduction related to the transfer.

Because California is a community property state, the payment from Depp to Heard may well have been structured to compensate the actress for her share of the marital property. If this is the case, the payment should be tax-free under Section 1041. Heard would have no taxable income, and would claim a \$7 million charitable contribution deduction.

BETA

While donations to charity are tax deductible, they are subject to various limitations depending on the nature of both the property being donated and the donee organization. When cash is being contributed to so-called "public charities" -- churches, schools, hospitals, governmental entities, private operating foundations, and other nonprofit agencies -- the taxpayer may only deduct the contribution up to 50% of the taxpayer's "adjusted gross income," which is generally taxable income less a few specific and rarely available deductions.

Because Heard would have no taxable income related to the payment received from Depp, she would get no corresponding charitable contribution deduction. But wait, you might say, Heard is a working actress, with roles in such illustrious works as *Magic Mike XXL* and *Zombieland*..surely she has significant income of her own that the charitable contribution can offset. Unfortunately, that's not the reality according to Heard's financial disclosures released as part of her request for alimony, which revealed that she earned only \$260,000 in 2016 *before* agent's commissions.

As a result, Heard could deduct only \$130,000 of her \$7 million contribution in 2016. The good news: a taxpayer may carry forward any unused charitable contribution deduction for five years. The bad news: if Heard will only be earning \$260,000 a year into the future, it would take her approximately 54 years to get the benefit of her entire \$7 million charitable contribution deduction.

There is also the possibility, however slim, that the payment from Depp to Heard was structured as alimony. Section 71 of the Code provides that a taxpayer must include in income "amounts received as alimony or separate

maintenance payments." This is further defined as any payments made from one spouse to the other, in cash, pursuant to a divorce or separation agreement. Interestingly, payments made for child support are *not* included in the recipient's taxable income, nor are they deductible on the tax return of the spouse making the payment. Because Heard and Depp had no children together (Depp has two from a previous marriage), however, that's not a possibility in this situation.

BETA

OK, so if Heard has to include \$7 million in taxable income in 2016, it's no big deal, she'll just deduct the \$7 million charitable contribution and wipe it all out, right? Wrong. As discussed above, Heard's deduction would be limited to 50% of the \$7 million, leaving the actress with net taxable income of \$3.5 million resulting from the two transfers.

It gets worse. A charitable contribution is claimed as an "itemized deduction." As a method of extracting more tax dollars from the wealthiest 2% of taxpayers, after January 1, 2013, any taxpayer with adjusted gross income in excess of \$250,000 (if single, \$300,000 if married filing jointly) will lose 3% of most itemized deductions for every dollar adjusted gross income exceeds that threshold. As a result, Heard could lose another \$200,000 of her charitable contribution to this "Pease limitation."

That would leave Heard in a bit of a conundrum: \$3.7 million of taxable income for a single taxpayer will result in a federal tax bill in the neighborhood of \$1.4 million. The problem, of course, is that Heard just *gave away all of her cash*, which begs the question: how the heck would she pay her tax bill? After all, as discussed above, Heard only earned \$260,000 last year, so unless she was paid a king's ransom for her turn in *Pineapple Express*, she'd better hope her divorce attorney was able to fit the \$7 million payment under Section 1041, resulting in tax-free treatment.

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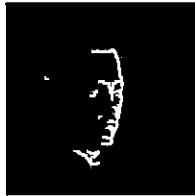
As further evidence that Heard may lack liquid assets, her career arc appears to be following the well-traveled path of "actor in desperate need of cash" (see Cage, Nicholas). She's signed on for not one, but two super-hero

films, with Heard set to appear in Justice League and Aquaman in the next two years.

BETA

Hey, you've gotta' pay the bills somehow, and pretending to communicate with undersea animals seems a more palatable option than most.

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DIVORCE · Published April 10, 2018

# Amber Heard donates \$7M Johnny Depp divorce settlement to children's hospital, charities



By Katherine Lam, | Fox News

## Amber Heard divorcing Johnny Depp

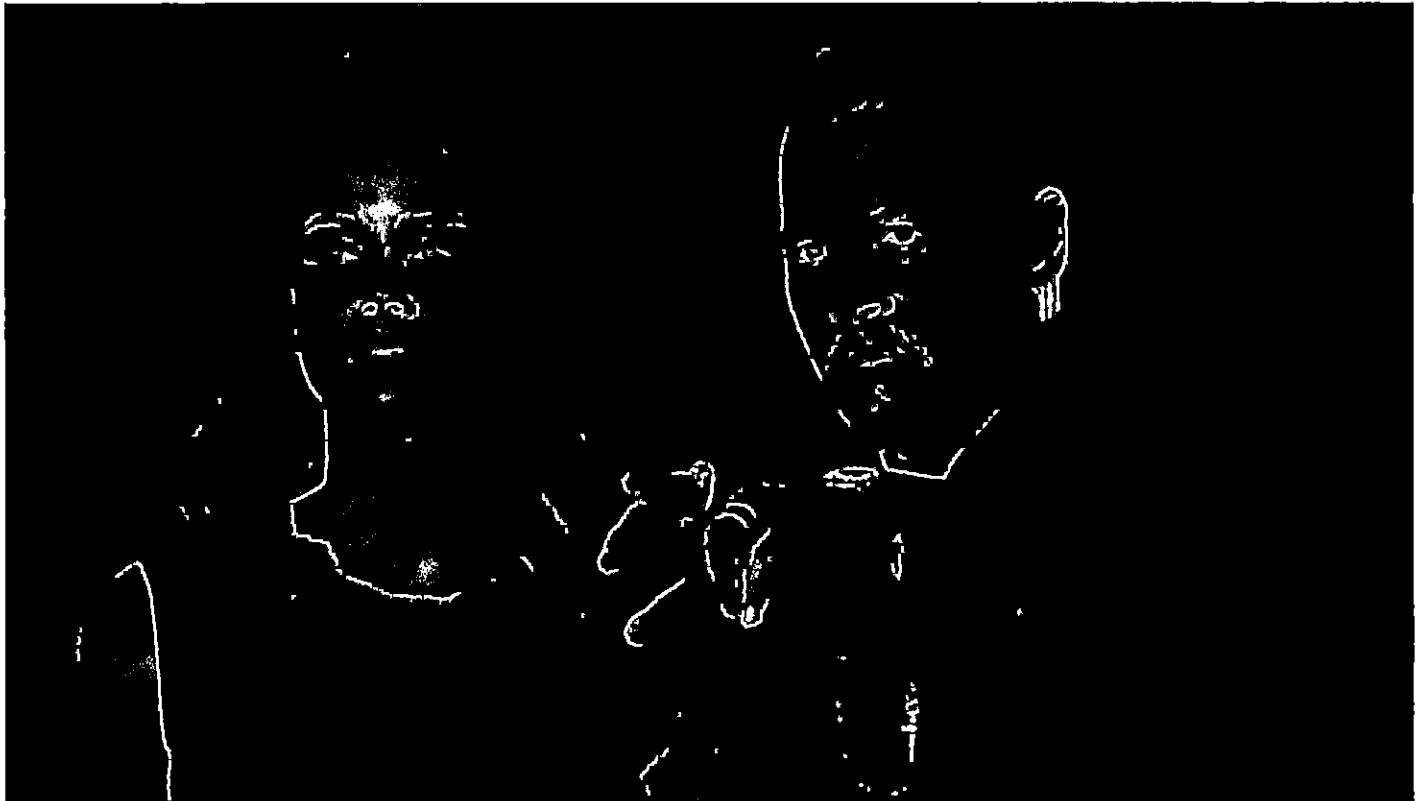
Fox411: Actress files for divorce 15 months after tying knot

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Amber Heard stayed true to her word and donated her \$7 million divorce settlement from Johnny Depp to charities focused on helping to stop violence against women and the Children's Hospital Los Angeles.

Children's Hospital Los Angeles revealed Monday that the 31-year-old actress donated between \$1 million and \$5 million sometime during the July 2016 to June 2017 fiscal year.

"On behalf of all the children and families whose lives you have impacted, and everyone at Children's Hospital Los Angeles, we offer our sincere thanks," the hospital wrote in its 2017 annual [report](#) under the "Honor Roll of Donors."



Amber Heard donated her \$7 million divorce settlement from Johnny Depp to charities and children's hospital. (Reuters)

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The rest of the divorce settlement money was divided among charities with "a particular focus to stop violence against women," [People](#) reported. Heard previously said her philanthropic work "centered around medical care, especially women and children."

It's unclear when Heard made the donations to the other charities.

Heard filed for divorce from Depp in 2016 after being married for 15 months. The couple met on the set of "The Rum Diary" in 2011. Their ugly split was surrounded by claims that Depp physically and verbally abused Heard. Depp was accused of throwing a cellphone at Heard during a drunken attack.

Heard announced in August she would be donating the money.

"As described in the restraining order and divorce settlement, money played no role for me personally and never has, except to the extent that I could donate it to charity and, in doing so, hopefully help those less able to defend themselves," Heard said in a statement.

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Katherine Lam is a breaking and trending news digital producer for Fox News. Follow her on Twitter at [@bykatherinelam](#)