

VIRGINIA:

IN THE CIRCUIT COURT OF FAIRFAX COUNTY

JOHN C. DEPP, II,

Plaintiff,

v.

AMBER LAURA HEARD,

Defendant.

Civil Action No.: CL-2019-0002911

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JOHN T. FREY
CLERK, CIRCUIT COURT
FAIRFAX, VA

**DEFENDANT AMBER LAURA HEARD'S MEMORANDUM IN SUPPORT OF
HER MOTION TO COMPEL PRODUCTION OF DOCUMENTS AND RESPONSES TO
INTERROGATORIES AND REQUESTS FOR ADMISSION**

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

Elaine Charlson Bredehoft (VSB #23766)
Carla D. Brown (VSB #44803)
Adam S. Nadelhaft (VSB #91717)
David E. Murphy (VSB #90938)
CHARLSON BREDEHOFT COHEN & BROWN, P.C.
11260 Roger Bacon Drive, Suite 201
Reston, VA 20190
(703) 318-6800
ebredehoft@cbcblaw.com
cbrown@cbcblaw.com
anadelhaft@cbcblaw.com
dmurphy@cbcblaw.com

Counsel to Defendant Amber Laura Heard

PRELIMINARY STATEMENT

Mr. Depp continues to make a mockery of Virginia's broad discovery Rules and Court Orders through a months-long campaign to avoid producing responsive documents or responding to Interrogatories and Requests for Admission harmful to his case, even when Ordered, and has instead resorted to boilerplate objections because he views discovery and this Court's Orders as an "invasion of his privacy." But it was Mr. Depp who brought this lawsuit and placed his deplorable conduct and reputation at issue by seeking \$50 million in damages against Ms. Heard for damage to his reputation. Ms. Heard has sent numerous deficiency letters, engaged in multiple meet and confer teleconferences, obtained a Court Order, and trusted Mr. Depp when he promised to supplement his discovery-to no avail. Even now, among other things, Mr. Depp has failed and refused to provide any response or documents supporting his \$50 million damages claim, and admits, but cannot explain why, he has not produced documents harmful to his claims, such as his communications directly relevant to Mr. Depp's claims and Ms. Heard's defenses.

Ms. Heard asks this Court hold Mr. Depp accountable for his discovery misconduct, compel the discovery requested in this Motion, and award Ms. Heard her attorney's fees, costs, and expenses incurred for having to bring yet another Motion to obtain relevant discovery.

ARGUMENT

A. Interrogatories Relating to Payments to Former Romantic Partners and Damages

Although Mr. Depp has placed at issue whether he has engaged in domestic violence against his prior romantic partners, Mr. Depp has refused to respond to interrogatories seeking information about payments made to them. Mr. Depp has also refused to respond to his income from his performances since 2010, while claiming his reputation has been damaged and he has suffered financial losses and is suing for \$50 million. **Exhibit 1, 2nd** Interrogatories 1-2. How does Mr. Depp plan to prove loss of revenue damages at trial without producing this evidence? Both of these Requests have been pending since December 20, 2019, yet Mr. Depp has not

provided any final agreement (two partials) and has not supplemented. Mr. Depp's response is a typical smattering of boilerplate and obstructionist objections, including objections to the use of the words "transfers" and "any," assertions of irrelevance and overbreadth, and a suggestion that the request invades Mr. Depp's privacy. *Id.* Mr. Depp then states that he has agreed to produce documents in response to a document request on this issue, but does not even identify the documents at issue and refuses to respond to the Interrogatory in a transparent dodge. *Id.*

Mr. Depp's objections are meritless. For Interrogatory 1, rather than answer the interrogatory's straightforward request for "payments" and "gifts" to former Romantic Partners, Mr. Depp uses faux-confusion over other words in his refusal to answer. The information called for is relevant, particularly because Mr. Depp himself has leaked declarations (again, without having produced them in this litigation) that he believes support his case. *See* Heard 6/12/20 Mot. to Compel at 2-3. Obviously, Ms. Heard has the right to test the credibility of these declarations with the information requested. And while Rule 4:8 allows a party to produce business records in lieu of responding to an interrogatory, that is only when the burden of deriving or ascertaining the answer is substantially the same on both parties, and the interrogatory must nevertheless specify the records produced. Va. Sup. Ct. R. 4:8(f) (requiring responding party to "specify the records from which the answer may be derived or ascertained" and to include "sufficient detail to permit the interrogating party to locate and to identify, as readily as can the party served, the records from which the answer may be ascertained"). Neither of these conditions is met here.¹ Mr. Depp

¹ The Court has already found that Mr. Depp's gratuitous allegations that he has never been violent toward any woman place these matters at issue. **Exhibit 2**, 10/18/19 Tr. at 21:12-22:14, 27:2-3 (granting the Motion to Compel and stating, *inter alia*, "Let me ask [Mr. Depp's counsel] a question. Does your complaint say that your client avers that he's not a domestic abuser and has never abused anyone? If that is in the complaint, why aren't they entitled to do discovery to find out whether that's a truthful statement that your client has put in the complaint? [Depp's Counsel]

should be required to provide a complete interrogatory response without objection within 14 days.

For Interrogatory 2 (Income from every performance 2010 to the present), Mr. Depp's objections are similarly boilerplate, and he simply refuses to answer the interrogatory. **Exhibit 1**, Interrogatory No. 2. But the fees Mr. Depp has earned from these performances are highly probative to his claim that Ms. Heard's Washington Post op-ed has caused him \$50 million in damages. Mr. Depp's public reputation and related income generation, exactly what he is suing Ms. Heard over, has already been falling for some time, and he is no longer the box office draw that perhaps he once was. **Exhibit 3**, *Anatomy of a Fallen Movie Star*, Variety, May 29, 2016.² It is likely that Mr. Depp has also made far less acting income in recent years, and Ms. Heard has the right to test Mr. Depp's theory of damages in this manner. Mr. Depp cannot evade compliance through boilerplate objections and a vague agreement to produce documents, without any specification of those documents or any showing of substantially similar burden, which he cannot make here. Va. Sup. Ct. R. 4:8. He should be ordered to produce these documents within 14 days.

B. Requests for Admission Regarding Mr. Depp's Conduct and Statements to Ms. Heard

Mr. Depp has flatly refused to respond to the following Requests for Admission on the grounds that the material sought is irrelevant, harassing, and an "invasion of privacy":

First RFAs #11: "Admit that You destroyed or damaged property in the presence of Amber Heard."

First RFAs #12: "Admit that You called Amber Heard a 'slut.'"

First RFAs #13: "Admit that You called Amber Heard a 'whore.'"

First RFAs #14: "Admit that You communicated to Amber Heard that she would not have any work as an actress when she got old and her 'tits sag.'"

That is a truthful statement. That is his claim ...[but] it is not relevant.... [Court:] [S]omebody thought it was relevant enough to put it in the complaint.").

² <https://variety.com/2016/film/box-office/johnny-depp-box-office-1201785126/>.

First RFAs #15: “Admit that You told Amber Heard that she would, should, or wanted to ‘get raped.’”

Exhibit 4, First Requests for Admissions Nos. 11-15. The information sought is relevant, and Virginia’s rules do not permit a party to refuse to answer on the bases cited. The Court has already ruled that Mr. Depp was required to produce information relating to destruction of property. *See* 10/18/19 Order. Mr. Depp’s tendency to violently destroy property when he is under the influence of drugs or alcohol is highly relevant to his propensity to be violent towards Ms. Heard when he is in the same state of mind. And Mr. Depp’s violent and crude ad hominem attacks on Ms. Heard are relevant to his state of mind as he committed violence towards her and his views toward her generally, which is certainly relevant to the ultimate factual issue in this case.

To the extent Mr. Depp believes that such information is not admissible under Virginia’s Rules of Evidence, that is a question best saved for trial, as ruled by the Court. *See Exhibit 2*, 10/18/19 Hrg. Tr. at 16:11-12 (“It doesn’t mean it’s admissible just because it is discovery.”).

C. Continuing Deficiencies, Including Violations of the Court’s October 18 Order

Mr. Depp has either declined or only partially produced information relating to the following categories of relevant discovery that Ms. Heard has sought for months without success:

- Documents and information in support of his claimed \$50 million in damages (*see, e.g.*, Heard First RFPs # 11-12 (**Exhibit 5**); Second RFPs #13-14 (**Exhibit 6**); First Interrogatories #16 (**Exhibit 7**);
- Documents responsive to certain of Ms. Heard’s Second RFPs #4 (acts of violence against other romantic partners), 10 (finger injury records), and 16 (payments by you to potential witnesses) (**Exhibit 6**);
- Information responsive to Ms. Heard’s First Interrogatories #1 (witness identification), 7 (business entities Plaintiff owns or controls), 8 (financial records for payments to witnesses), 12 (romantic partners), 13 (agreements with romantic partners) (attached as **Exhibit 7**);

All of these documents and the information requested are relevant to this lawsuit and, like everything else above, should have been produced months ago and should now be compelled.

D. Communications to and from Mr. Depp Regarding Violence Against Women

Mr. Depp has failed to produce highly relevant and damaging documents in response to Ms. Heard's Request for "documents and communications, from 2010 to the present, authored, written, transmitted, sent, or received by Mr. Depp containing discussion of or language reflecting misogyny, sexism, hatred of women, racism, homophobia, rape, violence toward women, abuse of women, and/or killing women." **Exhibit 8**, Third RFPs to Depp, No. 4. These documents are not only highly relevant to Mr. Depp's claimed reputation damages in this case, but also go to the truth of the underlying statements and conduct at the heart of Mr. Depp's claims. Mr. Depp has admitted that he has responsive documents, including extremely vile and disturbing texts from Mr. Depp to actor Paul Bettany on November 6, 2013 including: "Let's burn Amber!!!" and "Let's drown her before we burn her!!! I'll fuck her burnt corpse afterwards to make sure she is dead."³ Mr. Depp cannot reasonably claim communications with this content are irrelevant- rather, they are merely harmful to his claims, which on the contrary makes them readily discoverable and highly relevant.

Mr. Depp has only refused to produce these documents because they confirm his abusive tendencies, often highlighted by profound drug and alcohol abuse, and they should be produced.

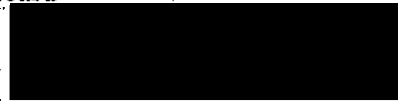
For all of these reasons, Ms. Heard respectfully requests the Court compel the requested discovery, and award her attorney's fees, costs, and expenses incurred in this Motion.

³ Mr. Depp sent additional texts to Mr. Bettany on May 30, 2014 recounting a plane flight in which Mr. Depp abused Ms. Heard while under the influence of a staggering cocktail of drugs and alcohol: "I'm gonna properly stop the booze thing, darling... Drank all night before I picked Amber up to fly to LA, this past Sunday... Ugly, mate... No food for days... Powders... Half a bottle of Whiskey, a thousand red bull and vodkas, pills, 2 bottles of Champers on plane and what do you get...??? An angry, aggro Injun in a fuckin' blackout, screaming obscenities and insulting any fuck who got near...I'm done. I am admittedly too fucked in the head to spray my rage at the one I love... For little reason, as well I'm too old to be that guy But, pills are fine!!!" Ms. Heard only learned about these messages when they were read in open court in the UK defamation case Mr. Depp brought against NGN, the parent company of *The Sun* newspaper.

Dated this 2nd day of July 2020

Respectfully submitted,

Amber L. Heard



By Counsel: _____

Elaine Charlson Bredehoft (VSB #23766)
Carla D. Brown (VSB #44803)
Adam S. Nadelhaft (VSB #91717)
David E. Murphy (VSB #90938)
CHARLSON BREDEHOFT COHEN & BROWN, P.C.
11260 Roger Bacon Drive, Suite 201
Reston, VA 20190
(703) 318-6800
ebredehoft@cbcblaw.com
cbrown@cbcblaw.com
anadelhaft@cbcblaw.com
dmurphy@cbcblaw.com

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

Counsel to Defendant Amber Laura Heard

CERTIFICATE OF SERVICE

I certify that on this 2nd day of July 2020, a copy of the foregoing shall be served by first class mail, postage prepaid, and by email, upon:

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

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

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

Counsel for Plaintiff John C. Depp, II



J. Benjamin Rottenborn
Joshua Treece
WOODS ROGERS PLC
10 S. Jefferson Street
Suite 1400
Roanoke, VA 24011
Telephone: (540) 983-7540
Facsimile: (540) 983-7711
broddenborn@woodsrogers.com
jtreece@woodsrogers.com

scope, and vague and ambiguous in its use of the terms “direct contact” and “sexual manner.” Plaintiff further objects to this term to the extent that it is inflammatory and harassing, assumes facts not in evidence, lacks foundation, calls for a medical and/or legal conclusion and seeks information unrelated to this case and that is unlikely to lead to the discovery of admissible evidence. Plaintiff will agree to meet and confer with Defendant regarding this term.

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

RESPONSE: No objection.

INTERROGATORIES

1. Identify any payments, gifts, or transfers of value of any kind, whether in monetary form or otherwise, made by You (and/or any entity or person affiliated or associated with You or acting on Your behalf) or concerning or for the benefit of You (and/or any entity or person affiliated or associated with You or acting on Your behalf), from 2012 to present to Winona Ryder, Jennifer Grey, Lori Allison, Sherilynn Fenn, Holly Robinson, Traci Lords, Juliette Lewis, Tatjana Patitz, Ellen Barkin, Kate Moss, Naomi Campbell, Vanessa Paradis, Christina Ricci, Keira Knightly, Marion Cotillard, Angelina Jolie, Eva Green, Ashley Oslen, Ruth Wilson, Robin Baum, Polina Glen, or any other Romantic Partners.

ANSWER:

In addition to the foregoing General Objections and Objections to Definitions and Instructions, Plaintiff objects to this Interrogatory as overly broad and unduly burdensome to the extent it asks Plaintiff to identify any “transfer” of any kind to any of 21 identified individuals plus an indefinite number of “romantic partners.” Plaintiff further objects to this Interrogatory to the extent it seeks documents and communications regarding “any” “romantic partners.” Plaintiff further objects to this Interrogatory as unlikely to lead to the discovery of admissible evidence and that it seeks documents and communications that are irrelevant, immaterial, or unnecessary to the issues in this Action. Plaintiff further objects to this Interrogatory to the extent it is intended to harass Plaintiff, and constitutes an invasion of privacy. Plaintiff further objects to this Interrogatory as unreasonably cumulative and duplicative of Defendant’s document requests,

specifically Request No. 2 in Defendant's Third Request for Production of Documents, and for which Plaintiff has agreed to produce responsive documents.

In light of the foregoing objections, Plaintiff will not respond to this Interrogatory.

2. State Your fees from every Performance from 2010 to the present.

ANSWER:

In addition to the foregoing General Objections and Objections to Definitions and Instructions, Plaintiff objects to this Interrogatory as overly broad and unduly burdensome, and to the extent that it seeks the information protected by the attorney-client privilege, the work product doctrine, or any other applicable privilege, immunity, or protection. Plaintiff further objects to this Interrogatory as unlikely to lead to the discovery of admissible evidence and that it seeks documents and communications that are irrelevant, immaterial, or unnecessary to the issues in this Action. Plaintiff further objects to this Interrogatory as unreasonably cumulative and duplicative of Defendant's document requests, specifically Request No. 3 in Defendant's Third Request for Production of Documents, and for which Plaintiff has agreed to produce responsive documents.

In light of the foregoing objections, Plaintiff will not respond to this Interrogatory.

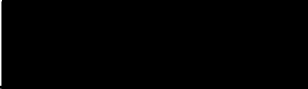
3. If you denied or objected to any of Defendant's First Set of Requests for Admission, state the basis of bases or reasons for your denials or objections.

ANSWER:

In addition to the foregoing General Objections and Objections to Definitions and Instructions, Plaintiff objects to this Interrogatory as overly broad and unduly burdensome, and to the extent that it seeks the production of documents or communications protected by the attorney-client privilege, the work product doctrine, or any other applicable privilege, immunity, or protection. Plaintiff further objects to this Interrogatory as unlikely to lead to the discovery of

Dated: December 20, 2019

Respectfully submitted,


Benjamin G. Chew (VSB #29113)
Elliot J. Weingarten (*pro hac vice*)
Camille M. Vasquez (*pro hac vice*)
Andrew C. Crawford (VSB #89093)
BROWN RUDNICK, LLP

601 Thirteenth Street NW, Suite 600
Washington, DC 20005
Phone: (202) 536-1785
Fax: (617) 289-0717
bchew@brownrudnick.com

- and -

Robert B. Gilmore (*pro hac vice*)
Kevin L. Attridge (*pro hac vice*)
STEIN MITCHELL BEATO & MISSNER LLP
901 15th Street NW, Suite 700
Washington, DC 20005
Phone: (202) 601-1589
Fax: (202) 296-8312
rgilmore@steinmitchell.com

Adam R. Waldman (*pro hac vice*)
THE ENDEAVOR GROUP LAW FIRM, P.C.
1775 Pennsylvania Avenue NW, Suite 350
Washington, DC 20006

Counsel for Plaintiff John C. Depp, II

CERTIFICATE OF SERVICE

I hereby certify that on this 20th day of December 2019, I caused copies of the foregoing to be served via email (per written agreement between the Parties) on the following:

Roberta A. Kaplan (*pro hac vice*)
Julie E. Fink (*pro hac vice*)
John C. Quinn (*pro hac vice*)
KAPLAN HECKER & FINK, LLP
350 Fifth Avenue, Suite 7110
New York, New York 10118
Telephone: (212) 763-0883
rkaplan@kaplanhecker.com
jfink@kaplanhecker.com
jqinn@kaplanhecker.com

Davida Brook (*pro hac vice*)
SUSMAN GODFREY LLP
1900 Avenue of the Stars
Suite 1400
Los Angeles, California
Telephone: (310) 789-3105
dbrooke@susmangodfrey.com

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

Timothy J. McEvoy, Esq. (VSB No. 33277)
Sean Patrick Roche, Esq. (VSB No. 71412)
CAMERON/McEVOY, PLLC
4100 Monument Corner Drive, Suite 420
Fairfax, Virginia 22030
Telephone: (703) 273-8898
Facsimile: (703) 273-8897
tmcevoy@cameronmcevoy.com
sroche@cameronmcevoy.com

Counsel for Defendant Amber Laura Heard

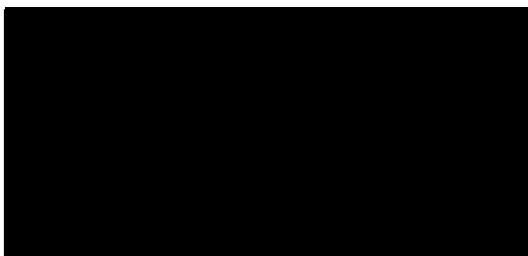

Benjamin G. Chew

CERTIFICATION

I hereby certify under penalty of perjury that the contents of the foregoing are true and accurate to the best of my knowledge, information and belief.

Dated: December 20, 2019

Location: Los Angeles, CA



John C. Devin III



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V I R G I N I A:

IN THE CIRCUIT COURT OF FAIRFAX COUNTY

-----X

JOHN C. DEPP, II,)

Plaintiff,)

-vs-)

NO. CL-2019-0002911

AMBER LAURA HEARD,)

Defendant.)

-----X

Hearing

BEFORE THE HONORABLE BRUCE D. WHITE

Fairfax, Virginia

Friday, October 18, 2019

10:49 a.m.

Job No.: 268360

Pages: 1 - 28

Reported by: Theresa R. Hollister, CCR

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1 THE COURT: Okay. Thank you.

2 MR. GILMORE: Good morning, Your Honor
3 Robert Gilmore for Plaintiff Johnny Depp.

4 THE COURT: Good morning.

5 MR. GILMORE: Defendant's motion to
6 compel is a fishing expedition, plain and simple,
7 Your Honor. It's intended to harass Mr. Depp and
8 it's intended to distract the court, the parties,
9 the jury from what's the sole issue in this case.

10 THE COURT: It isn't distracting the jury
11 because this is discovery. It doesn't mean it's
12 admissible just because it is discovery.

13 MR. GILMORE: Well, discovery has to be
14 reasonably calculated to lead to the discovery of --

15 THE COURT: No, I've said that because
16 you said it's going to mislead the jury.

17 MR. GILMORE: I think --

18 THE COURT: Hold on. I think you are
19 telling me something that's not really an issue for
20 me today.

21 MR. GILMORE: Well, whether it's
22 admissible is, to some extent, an issue today,

1 Ms. Heard's lawyers tried to wave around what they
2 thought were embarrassing and salacious documents to
3 pressure us to accede to their position on the
4 motion for the protective order. We're worried that
5 they're going to try to do those tactics throughout
6 this case. And that's why we think that allowing
7 this kind of discovery is just going to feed into
8 that. They want to taint the jury, harass my
9 client, and distract from what's at in their case,
10 whether their client is lying. That's not a proper
11 purpose for discovery.

12 Finally, with respect to Mr. Depp's past
13 alleged acts, those are not discoverable, because it
14 is, again, the kind of classic propensity evidence
15 that Rule 404 does not allow.

16 The prior allegation, we're not aware of
17 any document, Mr. Depp having any document
18 reflecting an allegation by any of Mr. Depp's other
19 romantic partners.

20 THE COURT: Let me ask you a question.
21 Does your complaint say that your client avers that
22 he's not a domestic abuser and has never abused

1 anyone? If that is in the complaint, why aren't
2 they entitled to do discovery to find out whether
3 that's a truthful statement that your client has put
4 in the complaint?

5 MR. GILMORE: That is a truthful
6 statement. That is his claim.

7 THE COURT: Then why aren't they allowed
8 to do discovery to see whether it is truthful or
9 not? They don't just need to take his word for it,
10 do they?

11 MR. GILMORE: That statement is not
12 relevant to what is at issue in this case.

13 THE COURT: Well, somebody thought it was
14 relevant enough to put it in the complaint.

15 MR. GILMORE: Understood. There are many
16 reasons why things are said in complaints. Truthful
17 statements are made. But whether that is a relevant
18 issue for the case to allow open-ended discovery on,
19 is a wholly different matter, Your Honor. Mr. Depp
20 understood that this case, since the public op-ed,
21 is going to be in the public press. And so it's
22 important for him to say that. But what's at issue

1 the lawsuit. And that's a little troubling.

2 But nonetheless, the motion to compel is
3 granted as to all matters at this point.

4 Would you all do an order. Of course,
5 note your exceptions.

6 MR. ROTTENBORN: Yes, Your Honor. Thank
7 you very much.

8 THE COURT: And the time for production,
9 you all are able to come up with an agreement on
10 that?

11 MR. CHEW: We actually planned to discuss
12 that right after this hearing.

13 THE COURT: Okay. Thank you. Hope
14 everybody has a good weekend.

15 (The hearing was concluded at 11:11 a.m.)

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Johnny Depp: Anatomy of a Fallen Movie Star

By Brent Lang ▾

89



Chelsea Lauren/Variety/REX/Shutterstock

In a 2005 episode of “Entourage” a super-agent played by Malcolm McDowell tells Jeremy Piven’s Ari Gold that his eight-year-old daughter knew that Johnny Depp was going to be a star when she watched “Platoon.”

“You showed her ‘Platoon’ when she was eight years old?” the hyper-caffinated Gold asks incredulously.

The joke may be about bad parenting, but the reality is that Depp was marked for stardom by Hollywood almost from the time he first turned heads in the Vietnam drama. After a brief detour into

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teen heartthrob-dom with the TV show "21 Jump Street," Depp began justifying that initial enthusiasm, amassing well received turns in the likes of "Ed Wood" and "Edward Scissorhands."

The movie industry was so convinced that the actor possessed that rare alchemy of talent and charisma that marks a true star, that it stuck by Depp for over a decade until he found his box office footing. Finally, with 2003's "Pirates of the Caribbean," Depp made good on that faith, scoring a global blockbuster and earning an Oscar nomination to boot.

ADVERTISEMENT

He quickly rose to the top of the A-list. His friendships with Hunter S. Thompson and Marlon Brando, fascination with pop culture flotsam and penchant for fedoras marked him as the most fascinating of the movie business' biggest names. Stardom seemed a lark for him; a grand caper he couldn't quite believe he pulled off.

Along with hits like "Alice in Wonderland" and "Charlie and the Chocolate Factory," he offered glossy magazines good copy. He owned a country estate in France, an island in the Bahamas and dug Baudelaire — a trifecta guaranteed to leave Graydon Carter inflamed.

But with this failure of "Alice Through the Looking Glass" this weekend and a tabloid-ready divorce from Amber Heard dominating airwaves, moviegoers may be growing tired of the actor. As Deadline's Anthony D'Alessandro notes, 35% of people cited Depp as the major reason for seeing "Through the Looking Glass." Five years ago, 51% of moviegoers said the star was the reason they saw its predecessor, "Alice in Wonderland." It's a signal that Depp's reign, which lasted for much of the early aughts, could be nearing its end.

There have been flops aplenty. "Transcendence" and "Mortdecai" didn't just bomb, they were excoriated by critics. "Lone Ranger," a \$225 million disaster that allowed Depp to fulfill a childhood fantasy of wearing a dead bird on his head, ranks alongside "Ishtar" and "Heaven's Gate" as one of the film industry's biggest disasters. And "Black Mass," with Depp's chameleonic turn as Whitey Bulger, reminded audiences of his shape-shifting talent, but cost too much and made too little. Plus, Depp's lack of campaigning for awards contributed to a snub at Oscar time.

"Into the Woods" was a hit, but Depp's work as the Wolf barely registered as a cameo, and wasn't heavily emphasized in marketing materials. Aside from that it's been a stream of duds and disappointments.

More damaging than the grosses, is that what made Depp so memorable and arresting — his rock star outfits, affected voice and scenery chewing performances — now feels tired. Depp still has the ability to break the internet. Witness the media furor over his legal headaches for sneaking his dogs into Australia. However, when it came to his bizarre, hostage-like video apology for violating the country's laws, people were laughing at Depp and not with him.

His divorce from Heard could further erode his standing. The actress is claiming Depp physically abused her and was dependent on drugs and alcohol. Photos showing Heard's bruised face have already appeared online. In the case of "Alice Through the Looking Glass," which was pitched at female audiences, the images may have depressed turnout.

Attorneys for the actor counter that the allegations have no merit and are an attempt to "secure a premature financial resolution." Yet, in the social media age, when stars' personal lives and careers collapse on each other, scandals can do lasting damage to reputations. Stardom is always ephemeral. Many actors are lucky to spend a decade topping casting lists. Now, the immediacy of Twitter and Facebook is acting as a double-edged sword. It magnifies an actor's virtues, propelling them into the popular consciousness, but if they stumble, the blowback is savage and unrelenting.

Like his idol, Brando, Depp could rebound. In the early '70s, Brando was so out of favor that he had to submit to a screen test to win the part of Don Corleone. That led to an Oscar for "The Godfather" and another nomination for "Last Tango in Paris"; two films that cemented his legacy.

"Depp is a fantastic actor, thus will always have a draw with the right project," said Jeff Bock, a box office analyst with Exhibitor Relations. "He needs to do what he always does...another pirate adventure and another team-up with his creative twin, Tim Burton."

Looking ahead, Depp is following part of that advice to the letter. He will return for a fifth "Pirates of the Caribbean" and has signed on for a remake of "Invisible Man," both of which could score commercially.

ADVERTISEMENT

Depp will also have to prove that he still has what it takes to astound audiences — not because of his off-screen antics or bizarre costume choices, but with the intensity of his talent. That won't be satisfied with another stint as Capt. Jack Sparrow. It may require facing the camera without the crutch of a gonzo hair style or an ocean of mascara.

"Audiences want to see the 'Donnie Brasco' Johnny Depp or the 'Blow' Johnny Depp," said Paul Dergarabedian, senior media analyst at ComScore. "They want him to play a real character again."

Correction: An earlier version of this article misidentified the actor playing the super agent in "Entourage."

89 COMMENTS

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because “threw” is not a defined term. Plaintiff will interpret this term in accordance with its ordinary English language usage.

Subject to and without waiving the foregoing objections, Plaintiff denies this Request.

11. Admit that You destroyed or damaged property in the presence of Amber Heard.

ANSWER:

In addition to the foregoing General Objections and Objections to Definitions and Instructions, Plaintiff objects to this Request to the extent it is intended to harass Plaintiff, and constitutes an invasion of privacy. Plaintiff further objects to this Request as unlikely to lead to the discovery of admissible evidence and that it seeks information that is irrelevant, immaterial, or unnecessary to the issues in this Action.

In light of the foregoing objections, Plaintiff will not respond to this Request.

12. Admit that You called Amber Heard a “slut.”

ANSWER:

In addition to the foregoing General Objections and Objections to Definitions and Instructions, Plaintiff objects to this Request to the extent it is intended to harass Plaintiff, and constitutes an invasion of privacy. Plaintiff further objects to this Request as unlikely to lead to the discovery of admissible evidence and that it seeks information that is irrelevant, immaterial, or unnecessary to the issues in this Action.

In light of the foregoing objections, Plaintiff will not respond to this Request.

13. Admit that You called Amber Heard a “whore.”

ANSWER:

In addition to the foregoing General Objections and Objections to Definitions and Instructions, Plaintiff objects to this Request to the extent it is intended to harass Plaintiff, and constitutes an invasion of privacy. Plaintiff further objects to this Request as unlikely to lead to

the discovery of admissible evidence and that it seeks information that is irrelevant, immaterial, or unnecessary to the issues in this Action.

In light of the foregoing objections, Plaintiff will not respond to this Request.

14. Admit that You communicated to Amber Heard that she would not have any work as an actress when she got old and her “tits sag.”

ANSWER:

In addition to the foregoing General Objections and Objections to Definitions and Instructions, Plaintiff objects to this Request to the extent it is intended to harass Plaintiff, and constitutes an invasion of privacy. Plaintiff further objects to this Request as unlikely to lead to the discovery of admissible evidence and that it seeks information that is irrelevant, immaterial, or unnecessary to the issues in this Action.

In light of the foregoing objections, Plaintiff will not respond to this Request.

15. Admit that You told Amber Heard that she would, should, or wanted to “get raped.”

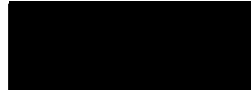
ANSWER:

In addition to the foregoing General Objections and Objections to Definitions and Instructions, Plaintiff objects to this Request to the extent it is intended to harass Plaintiff, and constitutes an invasion of privacy. Plaintiff further objects to this Request as unlikely to lead to the discovery of admissible evidence and that it seeks information that is irrelevant, immaterial, or unnecessary to the issues in this Action.

In light of the foregoing objections, Plaintiff will not respond to this Request.

Dated: December 20, 2019

Respectfully submitted,



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

- and -

Robert B. Gilmore (*pro hac vice*)
Kevin L. Attridge (*pro hac vice*)
STEIN MITCHELL BEATO & MISSNER LLP
901 15th Street NW, Suite 700
Washington, DC 20005
Phone: (202) 601-1589
Fax: (202) 296-8312
rgilmore@steinmitchell.com

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

Counsel for Plaintiff John C. Depp, II

CERTIFICATE OF SERVICE

I hereby certify that on this 20th day of December 2019, I caused copies of the foregoing to be served via email (per written agreement between the Parties) on the following:

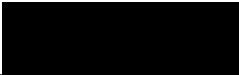
Roberta A. Kaplan (*pro hac vice*)
Julie E. Fink (*pro hac vice*)
John C. Quinn (*pro hac vice*)
KAPLAN HECKER & FINK, LLP
350 Fifth Avenue, Suite 7110
New York, New York 10118
Telephone: (212) 763-0883
rkaplan@kaplanhecker.com
jfink@kaplanhecker.com
jqinn@kaplanhecker.com

Davida Brook (*pro hac vice*)
SUSMAN GODFREY LLP
1900 Avenue of the Stars
Suite 1400
Los Angeles, California
Telephone: (310) 789-3105
dbrooke@susmangodfrey.com

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

Timothy J. McEvoy, Esq. (VSB No. 33277)
Sean Patrick Roche, Esq. (VSB No. 71412)
CAMERON/McEVOY, PLLC
4100 Monument Corner Drive, Suite 420
Fairfax, Virginia 22030
Telephone: (703) 273-8898
Facsimile: (703) 273-8897
tmcevoy@cameronmcevoy.com
sroche@cameronmcevoy.com

Counsel for Defendant Amber Laura Heard


Benjamin G. Chew

In addition to the foregoing General Objections and Objections to Definitions and Instructions, Plaintiff objects to this Request as overly broad and unduly burdensome, and to the extent that it seeks the production of documents or communications protected by the attorney-client privilege, the work product doctrine, or any other applicable privilege, immunity, or protection. Plaintiff further objects to this Request to the extent that it calls for a legal conclusion.

Subject to and without waiving the foregoing objections, Plaintiff will produce non-privileged documents responsive to this Request, if any, that are located after a reasonable search, and in accordance with a schedule to be agreed upon by the parties.

10. All DOCUMENTS and COMMUNICATIONS supporting YOUR contention that “Ms. Heard’s false implication prejudiced Mr. Depp in his career as a film actor and incalculably (and immediately) damaged his reputation as a public figure,” as alleged in paragraph 4 of YOUR COMPLAINT.

RESPONSE:

In addition to the foregoing General Objections and Objections to Definitions and Instructions, Plaintiff objects to this Request as overly broad and unduly burdensome, and to the extent that it seeks the production of documents or communications protected by the attorney-client privilege, the work product doctrine, or any other applicable privilege, immunity, or protection.

Subject to and without waiving the foregoing objections, Plaintiff will produce non-privileged documents responsive to this Request, if any, that are located after a reasonable search, and in accordance with a schedule to be agreed upon by the parties.

11. All DOCUMENTS and COMMUNICATIONS related to your termination as the character “Captain Jack Sparrow” in the Pirates of the Caribbean movie franchise.

RESPONSE:

In addition to the foregoing General Objections and Objections to Definitions and Instructions, Plaintiff objects to this Request as overly broad and unduly burdensome, and to the extent that it seeks the production of documents or communications protected by the attorney-client privilege, the work product doctrine, or any other applicable privilege, immunity, or protection. Plaintiff further objects to this Request to the extent it seeks production of documents outside of Plaintiff's possession, custody or control.

Subject to and without waiving the foregoing objections, Plaintiff will produce non-privileged documents responsive to this Request, if any, that are located after a reasonable search, and in accordance with a schedule to be agreed upon by the parties.

12. All DOCUMENTS and COMMUNICATIONS related to any other acting roles which were not provided to YOU, or which were rescinded, as a result of the op-ed in question.

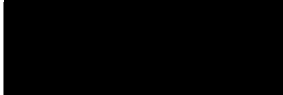
RESPONSE:

In addition to the foregoing General Objections and Objections to Definitions and Instructions, Plaintiff objects to this Request as overly broad and unduly burdensome, and to the extent that it seeks the production of documents or communications protected by the attorney-client privilege, the work product doctrine, or any other applicable privilege, immunity, or protection. Plaintiff further objects to this Request to the extent it seeks production of documents outside of Plaintiff's possession, custody or control.

Subject to and without waiving the foregoing objections, Plaintiff will produce non-privileged documents responsive to this Request, if any, that are located after a reasonable search, and in accordance with a schedule to be agreed upon by the parties.

13. All "security video footage" from the Eastern Columbia Building from 2013 to 2016, as referenced in paragraph 51 of YOUR COMPLAINT.

RESPONSE:


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

- and -

Robert B. Gilmore (*pro hac vice*)
Kevin L. Attridge (*pro hac vice*)
STEIN MITCHELL BEATO & MISSNER LLP
901 15th Street NW, Suite 700
Washington, DC 20005
Phone: (202) 601-1589
Fax: (202) 296-8312
rgilmore@steinmitchell.com

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

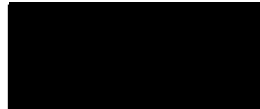
Counsel for Plaintiff John C. Depp, II

CERTIFICATE OF SERVICE

I hereby certify that on this 3rd day of September, 2019, I caused a copy of the foregoing document to be served by email and first class mail pursuant to Rule 1:12 of the Supreme Court of Virginia to the following:

Timothy J. McEvoy, Esq.
Sean Patrick Roche, Esq.
CAMERON/McEVOY, PLLC
4100 Monument Corner Drive, Suite 420
Fairfax, VA 22030
Phone: (703) 273-8898
Fax: (703) 273-8897
tmcevoy@cameronmcevoy.com
sroche@cameronmcevoy.com

Eric M. George, Esq.
Richard A. Schwartz, Esq.
BROWNE GEORGE ROSS LLP
2121 Avenue of the Stars, Suite 2800
Los Angeles, CA 90067
Phone: (310) 274-1700
Fax: (310) 275-5697
egeorge@bgrfirm.com
rschwartz@bgrfirm.com


Benjamin G. Chew

unlikely to lead to the discovery of admissible evidence and that it seeks documents and communications that are irrelevant, immaterial, or unnecessary to the issues in this Action. Plaintiff further objects to this Request to the extent it is intended to harass Plaintiff, and constitutes an invasion of privacy.

Subject to and without waiving the foregoing objections, Plaintiff will produce non-privileged documents responsive to this Request concerning Defendant and that refer or relate to the claims and defenses in this case, if any, that are located after a reasonable search, and in accordance with a schedule to be agreed upon by the parties.

4. All documents and/or communications with anyone not listed in Request 51 that refer or relate to You, Ms. Heard, any act of violence committed by You against any other of Your Romantic Partners, or the claims and defenses in this Action, from January 1, 2010 to the present.

RESPONSE:

In addition to the foregoing General Objections and Objections to Definitions and Instructions, Plaintiff objects to this Request as overly broad and unduly burdensome, and to the extent that it seeks the production of documents or communications protected by the attorney-client privilege, the work product doctrine, or any other applicable privilege, immunity, or protection. Plaintiff further objects to this Request to the extent it seeks documents and communications regarding “any” “romantic partners.” Plaintiff further objects to this Request as unlikely to lead to the discovery of admissible evidence and that it seeks documents and communications that are irrelevant, immaterial, or unnecessary to the issues in this Action. Plaintiff further objects to this Request to the extent it is intended to harass Plaintiff, and constitutes an invasion of privacy. Plaintiff further objects to this Request to the extent that it refers to “Request 51.” Defendant has not served any request for production numbered “51.”

In light of the foregoing objections, Plaintiff will not produce any documents in response to this Request until Defendant clarifies "Request 51." Upon clarification of this ambiguity, Plaintiff will re-evaluate this Request to determine whether he will produce documents in response.

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

RESPONSE:

In addition to the foregoing General Objections and Objections to Definitions and Instructions, Plaintiff objects to this Request as overly broad and unduly burdensome, and to the extent that it seeks the production of documents or communications protected by the attorney-client privilege, the work product doctrine, or any other applicable privilege, immunity, or protection. Plaintiff further objects to this Request as unlikely to lead to the discovery of admissible evidence and that it seeks documents and communications that are irrelevant, immaterial, or unnecessary to the issues in this Action. Plaintiff further objects to this Request to the extent it is intended to harass Plaintiff, and constitutes an invasion of privacy.

Subject to and without waiving the foregoing objections, Plaintiff will produce non-privileged documents responsive to this Request concerning Defendant and that refer or relate to the claims and defenses in this case, if any, that are located after a reasonable search, and in accordance with a schedule to be agreed upon by the parties.

6. 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 that are identified in response to Interrogatory No. 9, from 2010 to the present, including but not limited to Dr. David Kipper.

RESPONSE:

In addition to the foregoing General Objections and Objections to Definitions and Instructions, Plaintiff objects to this Request as overly broad and unduly burdensome, and to the

Accountability Act of 1996 (“HIPAA”). Plaintiff further objects on the grounds that this Request calls for a medical and/or legal conclusion.

Subject to and without waiving the foregoing objections, Plaintiff will produce non-privileged documents responsive to this Request concerning Defendant and that refer or relate to the claims and defenses in this case, if any, that are located after a reasonable search, and in accordance with a schedule to be agreed upon by the parties.

9. All documents and/or communications concerning the alleged injury to Your finger referred to in Paragraphs 15 and 28 of the Complaint with any person or entity involved in the production of any film.

RESPONSE:

In addition to the foregoing General Objections and Objections to Definitions and Instructions, Plaintiff objects to this Request as overly broad and unduly burdensome, and to the extent that it seeks the production of documents or communications protected by the attorney-client privilege, the work product doctrine, or any other applicable privilege, immunity, or protection.

Subject to and without waiving the foregoing objections, Plaintiff will produce non-privileged documents responsive to this Request, if any, that are located after a reasonable search, and in accordance with a schedule to be agreed upon by the parties.

10. All documents and/or communications concerning the alleged injury to Your finger referred to in Paragraphs 15 and 28 of the Complaint with any insurer, or relating to any insurer or insurance policy.

RESPONSE:

In addition to the foregoing General Objections and Objections to Definitions and Instructions, Plaintiff objects to this Request as overly broad and unduly burdensome, and to the extent that it seeks the production of documents or communications protected by the attorney-client privilege, the work product doctrine, or any other applicable privilege, immunity, or

protection. Plaintiff further objects to this Request to the extent it calls for confidential, personal business, financial, medical, or other proprietary information protected by law, including information that may be protected by the physician-patient privilege and/or the Privacy Rule of the Health Insurance Portability and Accountability Act of 1996 (“HIPAA”). Plaintiff further objects on the grounds that this Request calls for a medical and/or legal conclusion.

Subject to and without waiving the foregoing objections, Plaintiff will produce non-privileged documents responsive to this Request, if any, that are located after a reasonable search, and in accordance with a schedule to be agreed upon by the parties.

11. All documents and/or communications, from 2010 to the present, with any person or entity regarding any attempts to purchase or procure insurance for any film, performance, appearance or advertisement involving You, including, without limitation, all films referred to in paragraphs 71-73 of the Complaint.

RESPONSE:

In addition to the foregoing General Objections and Objections to Definitions and Instructions, Plaintiff objects to this Request as overly broad and unduly burdensome, and to the extent that it seeks the production of documents or communications protected by the attorney-client privilege, the work product doctrine, or any other applicable privilege, immunity, or protection. Plaintiff further objects to this Request to the extent it is intended to harass Plaintiff, and constitutes an invasion of privacy. Plaintiff further objects to this Request to the extent that it seeks documents outside of his possession, custody or control. Plaintiff further objects to this Request as unlikely to lead to the discovery of admissible evidence and that it seeks documents and communications that are irrelevant, immaterial, or unnecessary to the issues in this Action.

Subject to and without waiving the foregoing objections, Plaintiff will produce non-privileged documents responsive to this Request, if any, that are located after a reasonable search, and in accordance with a schedule to be agreed upon by the parties.

12. All documents and/or communications, from 2010 to the present, with any person or entity involved in any film, performance, appearance or advertisement involving You regarding the loss of any opportunity for You in connection with such film, performance, appearance or advertisement, including, without limitation, all films referred to in paragraphs 71- 73 of the Complaint.

RESPONSE:

In addition to the foregoing General Objections and Objections to Definitions and Instructions, Plaintiff objects to this Request as overly broad and unduly burdensome, and to the extent that it seeks the production of documents or communications protected by the attorney-client privilege, the work product doctrine, or any other applicable privilege, immunity, or protection. Plaintiff further objects to this Request to the extent it is intended to harass Plaintiff, and constitutes an invasion of privacy. Plaintiff further objects to this Request to the extent that it seeks documents outside of his possession, custody or control. Plaintiff further objects to this Request as unlikely to lead to the discovery of admissible evidence and that it seeks documents and communications that are irrelevant, immaterial, or unnecessary to the issues in this Action.

Subject to and without waiving the foregoing objections, Plaintiff will produce non-privileged documents responsive to this Request, if any, that are located after a reasonable search, and in accordance with a schedule to be agreed upon by the parties.

13. All documents referring or relating to damages or losses for which You seek recovery in this Action.

RESPONSE:

Subject to and without waiving the foregoing General Objections and Objections to Definitions and Instructions, Plaintiff will produce non-privileged documents responsive to this Request, if any, that are located after a reasonable search, and in accordance with a schedule to be agreed upon by the parties.

14. Documents sufficient to show Your income, all sources thereof, and any related expenses for each calendar year from 2010 to the present.

RESPONSE:

In addition to the foregoing General Objections and Objections to Definitions and Instructions, Plaintiff objects to this Request as overly broad and unduly burdensome, and to the extent that it seeks the production of documents or communications protected by the attorney-client privilege, the work product doctrine, or any other applicable privilege, immunity, or protection. Plaintiff further objects to this Request to the extent it is intended to harass Plaintiff, and constitutes an invasion of privacy. Plaintiff further objects to this Request as unlikely to lead to the discovery of admissible evidence and that it seeks documents and communications that are irrelevant, immaterial, or unnecessary to the issues in this Action.

In light of the foregoing objections, Plaintiff will not be producing documents in response to this Request.

15. Documents sufficient to show the ownership and control of and/or management rights over each entity listed in Your response to Interrogatory No. 7 for each calendar year from January 1, 2010 to present.

RESPONSE:

In addition to the foregoing General Objections and Objections to Definitions and Instructions, Plaintiff objects to this Request as overly broad and unduly burdensome, and to the extent that it seeks the production of documents or communications protected by the attorney-client privilege, the work product doctrine, or any other applicable privilege, immunity, or protection. Plaintiff further objects to this Request to the extent it is intended to harass Plaintiff, and constitutes an invasion of privacy. Plaintiff further objects to this Request as unlikely to lead to the discovery of admissible evidence and that it seeks documents and communications that are irrelevant, immaterial, or unnecessary to the issues in this Action.

In light of the foregoing objections, Plaintiff will not be producing documents in response to this Request.

16. Documents sufficient to show all transactions from January 1, 2010 to the present between you or any of the entities listed in Your response to Interrogatory No. 7, on the one hand, and any of the following individuals, on the other: Alejandro Romero, Ben King, Bobby de Leon, Brandon Patterson, Bruce Witkin, C.J. Roberts, Christi Dembrowski, Dr. Connell Cowan, Cornelius Harrell, Dr. David Kipper, Debbi Lloyd, Erin Boerum (Falati), Isaac Baruch, Jerry Judge, Joel Mandel, Josh Drew, Keenan Wyatt, Kevin Murphy, Laura Divenere, Lisa Beane, Malcolm Connolly, Melissa Saenz, Nathan Holmes, Samantha McMillen, Sam Sarkar, Savannah McMillan, Sean Bett, Stephen Deuters, Tara Roberts, Todd Norman, Trinity Esparza, Trudy Salven, Tyler Hadden.

RESPONSE:

In addition to the foregoing General Objections and Objections to Definitions and Instructions, Plaintiff objects to this Request as overly broad and unduly burdensome, and to the extent that it seeks the production of documents or communications protected by the attorney-client privilege, the work product doctrine, or any other applicable privilege, immunity, or protection. Plaintiff further objects to this Request to the extent it is intended to harass Plaintiff, and constitutes an invasion of privacy. Plaintiff further objects to this Request as unlikely to lead to the discovery of admissible evidence and that it seeks documents and communications that are irrelevant, immaterial, or unnecessary to the issues in this Action.

In light of the foregoing objections, Plaintiff will not be producing documents in response to this Request.

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

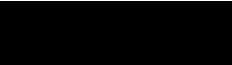
RESPONSE:

In addition to the foregoing General Objections and Objections to Definitions and Instructions, Plaintiff objects to this Request as premature, and expressly reserves his right to supplement his response to this Request.

Subject to and without waiving the foregoing objections, Plaintiff will produce non-privileged documents responsive to this Request, if any, in accordance with a schedule to be

Dated: October 28, 2019

Respectfully submitted,


Benjamin G. Chew (VSB #29113)
Elliot J. Weingarten (*pro hac vice*)
Camille M. Vasquez (*pro hac vice*)
Andrew C. Crawford (VSB #89093)
BROWN RUDNICK, LLP

601 Thirteenth Street NW, Suite 600
Washington, DC 20005
Phone: (202) 536-1785
Fax: (617) 289-0717
bchew@brownrudnick.com

- and -

Robert B. Gilmore (*pro hac vice*)
Kevin L. Attridge (*pro hac vice*)
STEIN MITCHELL BEATO & MISSNER LLP
901 15th Street NW, Suite 700
Washington, DC 20005
Phone: (202) 601-1589
Fax: (202) 296-8312
rgilmore@steinmitchell.com

Adam R. Waldman (*pro hac vice*)
THE ENDEAVOR GROUP LAW FIRM, P.C.
1775 Pennsylvania Avenue NW, Suite 350
Washington, DC 20006

Counsel for Plaintiff John C. Depp, II

CERTIFICATE OF SERVICE

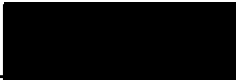
I hereby certify that on this 28th day of October 2019, I caused copies of the foregoing to be served via email (per written agreement between the Parties) on the following:

Roberta A. Kaplan (*pro hac vice*)
Julie E. Fink (*pro hac vice*)
John C. Quinn (*pro hac vice*)
Joshua Matz (*pro hac vice*)
KAPLAN HECKER & FINK, LLP
350 Fifth Avenue, Suite 7110
New York, New York 10118
Telephone: (212) 763-0883
rkaplan@kaplanhecker.com
jfink@kaplanhecker.com
jqquinn@kaplanhecker.com
jmatz@kaplanhecker.com

Eric M. George (*pro hac vice*)
Richard A. Schwartz (*pro hac vice*)
BROWNE GEORGE ROSS LLP
2121 Avenue of the Stars, Suite 2800
Los Angeles, California 90067
Telephone: (310) 274-7100
Facsimile: (310) 275-5697
egeorge@bgrfirm.com
rschwartz@bgrfirm.com

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

Counsel for Defendant Amber Laura Heard



Benjamin G. Chew

EXHIBIT 7

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

RESPONSE: No objection.

INTERROGATORIES

1. Identify each person having any knowledge or information about any of the claims or defenses in this case, including but not limited to Your (a) substance abuse, (b) damage of property, (c) acts of violence, (d) abuse in any form of any Romantic Partner, and (e) relationship with Ms. Heard. The answer to this Interrogatory should include contact information, to the extent known, for the following: Alejandro Romero, Ben King, Bobby de Leon, Brandon Patterson, Bruce Witkin, Christi Dembrowski, C.J. Roberts, Dr. Connell Cowan, Cornelius Harrell, Dr. David Kipper, Debbie Lloyd, Erin Boerum (Falati), Isaac Baruch, Joel Mandel, Kevin Murphy, Jerry Judge, Josh Drew, Keenan Wyatt, Laura Divenere, Lisa Beane, Malcolm Connolly, Melissa Saenz, Nathan Holmes, Samantha McMillan, Sam Sarkar, Sean Bett, Stephen Deuters, Tara Roberts, Todd Norman, Trinity Esparza, Trudy Salven, Tyler Hadden.

ANSWER:

In addition to the foregoing General Objections and Objections to Definitions and Instructions, Plaintiff objects to this Interrogatory as overly broad and unduly burdensome, and to the extent that it seeks the information protected by the attorney-client privilege, the work product doctrine, or any other applicable privilege, immunity, or protection. Plaintiff further objects to this Interrogatory as calling for information that is neither relevant nor proportional to this case. Plaintiff’s purported substance abuse, damage of property, acts of violence, and “abuse in any form” are irrelevant to the claims or defenses in this case. Plaintiff further objects to the extent that this Interrogatory assumes facts not in evidence, and contains allegations that Mr. Depp intends to disprove.

Subject to and without waiving the foregoing objections, Plaintiff identifies the following individuals with knowledge of the claims or defenses in this case:

Person	Contact Information
Isaac Baruch	Unknown
Lisa Beane	Unknown
Sean Bett	Contact through Plaintiff's counsel.
Robin Baum	901 Highland Ave, Los Angeles , CA 90038 (310) 461-0100
Erin Boerum	Unknown
Malcolm Connolly	Unknown
Dr. Connell Cowan	Unknown
Bobby de Leon	Unknown
Elisa "Christi" Dembrowski	To be contacted through counsel Dylan Ruga, Stalwart Law Group, 1100 Glendon Ave., 17th Floor Los Angeles, CA 90024, 310-954-2000
Gina Deuters	Contact through Plaintiff's counsel.
Stephen Deuters	Contact through Plaintiff's counsel.
Laura Divenere	Unknown
Josh Drew	Unknown
Trinity Esparza	Unknown
Tyler Hadden	Unknown
Cornelius Harrell	Unknown
Nathan Holmes	Unknown
Jerry Judge	Deceased
Ben King	Unknown
Dr. David Kipper	Unknown

Debbie Lloyd	Unknown
Joel Mandel	To be contacted through Michael Kump and Suann MacIsaac, Kinsella Weitzman Iser Kump & Aldisert LLP, 808 Wilshire Blvd., Santa Monica, CA 90401, 310-566-9800
Samantha McMillen	Unknown
Kevin Murphy	Unknown
Todd Norman	Unknown
Brandon Patterson	Unknown
C.J. Roberts	Unknown
Tara Roberts	Unknown
Alejandro Romero	Unknown
Anthony Romero	Unknown
Melissa Saenz	Unknown
Trudy Salven	Unknown
Sam Sarkar	Unknown
Robin Schulman	Unknown
Doug Stanhope	Unknown
Laura Wasser	2049 Century Park East, Suite 800 Los Angeles, CA 90067, (310) 277-7117
Wasser, Cooperman & Mandles, P.C.	2049 Century Park East, Suite 800 Los Angeles, CA 90067, (310) 277-7117
Jessica Weitz	Unknown
Bruce Witkin	Unknown
Keenan Wyatt	Unknown

Blair Berk	Unknown
Jacob Bloom	Unknown

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 a statement, and the date of each such statement.

ANSWER:

In addition to the foregoing General Objections and Objections to Definitions and Instructions, Plaintiff objects to this Interrogatory as overly broad and unduly burdensome, and to the extent that it seeks the information protected by the attorney-client privilege, the work product doctrine, or any other applicable privilege, immunity, or protection.

Subject to and without waiving the foregoing objections, Plaintiff identifies the following statements: Plaintiff's declaration in support of his opposition to the motion to dismiss and Kevin Murphy's (Plaintiff's former estate manager) declaration in support of Plaintiff's opposition to the motion to dismiss.

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 Ms. Heard.

ANSWER:

In addition to the foregoing General Objections and Objections to Definitions and Instructions, Plaintiff objects to this Interrogatory as overly broad and unduly burdensome, and to the extent that it seeks the production of documents or communications protected by the attorney-client privilege, the work product doctrine, or any other applicable privilege, immunity,

or protection. Plaintiff further objects to this Interrogatory as referring to “any person identified in Your answer to Interrogatory No. 2” as vague and ambiguous. Plaintiff will interpret this phrase to mean “any person identified in Your answer to Interrogatory No. 1.”

Subject to and without waiving the foregoing objections, Plaintiff identifies the following: “J,” “JD,” “Johnny,” “Sparrow,” “Steve,” “Him,” “David Michael,” and “Peter D.”.

6. Identify each private aircraft company that You used for travel between January 1, 2010 to the present.

ANSWER:

In addition to the foregoing General Objections and Objections to Definitions and Instructions, Plaintiff objects to this Interrogatory as overly broad and unduly burdensome, and to the extent that it seeks the information protected by the attorney-client privilege, the work product doctrine, or any other applicable privilege, immunity, or protection. Plaintiff further objects to this Interrogatory as calling for information that is neither relevant nor proportional to this case. Not every private aircraft used by Mr. Depp is relevant to this case.

Subject to and without waiving the foregoing objections, Plaintiff identifies the following: TourJet, Trans-Exec Air Service, Inc., FreeSpeed Aviation, LLC, and ExecuJet Aviation Group.

7. Identify each entity (including, without limitation, corporation, company, partnership, or any other kind of business association) under Your direct or indirect control, or over which You hold a direct or indirect ownership interest.

ANSWER:

In addition to the foregoing General Objections and Objections to Definitions and Instructions, Plaintiff objects to this Interrogatory as overly broad and unduly burdensome, and to the extent that it seeks the information protected by the attorney-client privilege, the work product doctrine, or any other applicable privilege, immunity, or protection. Plaintiff further

objects to this Interrogatory as calling for information that is neither relevant nor proportional to this case. Not every entity in which Mr. Depp holds an interest is relevant to this case.

Subject to and without waiving the foregoing objections, Plaintiff identifies the following: A Contrario, Brave Pictures, Inc., Contre Courant, The Depp Irrevocable Trust, HST Archives, LLC, Scaramanga Bros., Inc., L.R.D. Productions, Inc., Infinitum Nihil, Inc., Infinitum Nihil Publishing, LLC, Infinitum Nihil Records, LLC, Infinitum Nihil Media, LLC, Infinitum Nihil Music, LLC, JDM Ventures, LLC, John C. Depp II Insurance Trust, John C. Depp II Living Trust, L.R.D. Productions, Inc., Le Hameau du Bebe, LLC, Stratton Films, Inc., The Mooh Investment Trust, P Music Group, LLC, Versailles Road Trust, Sweetzer Trust, LLC, SCI La Pierre, Stratton Films, Inc., and Vajoliroja, LLC.

8. Identify and describe any and all electronic systems You and/or any entities listed in Your answer to Interrogatory No. 7 use to effect, track, monitor, or create records of incoming and outgoing payments, including without limitation any system maintained with or having any relation to City National Bank. Further identify and describe any and all outgoing and incoming payments, from 2010 to the present, to or from the individuals listed in Defendant's Request for Production No. 16 made using each such system, including the amount and purpose of each such payment.

ANSWER:

In addition to the foregoing General Objections and Objections to Definitions and Instructions, Plaintiff objects to this Interrogatory as overly broad and unduly burdensome, and to the extent that it seeks the information protected by the attorney-client privilege, the work product doctrine, or any other applicable privilege, immunity, or protection. Plaintiff further objects to this Interrogatory as calling for information that is neither relevant nor proportional to this case.

In light of the foregoing objections, Plaintiff will not be responding to this Interrogatory.

9. 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 or consulted or who examined You or provided treatment or services to You from

ANSWER:

In addition to the foregoing General Objections and Objections to Definitions and Instructions, Plaintiff objects to this Interrogatory as overly broad and unduly burdensome, and to the extent that it seeks the information protected by the attorney-client privilege, the work product doctrine, or any other applicable privilege, immunity, or protection. Plaintiff further objects to this Interrogatory as calling for information that is neither relevant nor proportional to this case. Plaintiff further objects to this Interrogatory because it assumes facts not in evidence, and assumes the truth of Ms. Heard's Declaration. Mr. Depp disputes the allegations of Ms. Heard's allegations. Plaintiff further objects to this Interrogatory because it seeks information more readily obtained by other means, including by way to deposition testimony and/or document discovery. Plaintiff further objects to this Interrogatory to the extent it is intended to harass Plaintiff, and constitutes an invasion of privacy. Plaintiff further objects to this Interrogatory because it calls for a legal conclusion. Plaintiff further objects to this Interrogatory because it is compound.

In light of the foregoing objections, Plaintiff will not respond Interrogatory because he denies all allegations of physical violence and abuse in Ms. Heard's declaration.

12. Identify each Romantic Partner, other than Ms. Heard, that You have had in the past 10 years.

ANSWER:

In addition to the foregoing General Objections and Objections to Definitions and Instructions, Plaintiff objects to this Interrogatory as overly broad and unduly burdensome, and to the extent that it seeks the information protected by the attorney-client privilege, the work product doctrine, or any other applicable privilege, immunity, or protection. Plaintiff further objects to this Interrogatory as calling for information that is neither relevant nor proportional to

this case. Plaintiff further objects to this Interrogatory because it seeks information more readily obtained by other means, including by way to deposition testimony and/or document discovery. Plaintiff further objects to this Interrogatory to the extent it is intended to harass Plaintiff, and constitutes an invasion of privacy. Plaintiff further objects to this Interrogatory as calling for information that is neither relevant nor proportional to this case.

Subject to and without waiving the foregoing objections, none of Mr. Depp's prior Romantic Partners have ever alleged any acts of physical violence or abuse by Mr. Depp other than Ms. Heard. Notwithstanding the foregoing, Mr. Depp has had romantic relationships in the past ten years with Vanessa Paradis and Polina Glen.

13. 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.

ANSWER:

In addition to the foregoing General Objections and Objections to Definitions and Instructions, Plaintiff objects to this Interrogatory as overly broad and unduly burdensome, and to the extent that it seeks the information protected by the attorney-client privilege, the work product doctrine, or any other applicable privilege, immunity, or protection. Plaintiff further objects to this Interrogatory as calling for information that is neither relevant nor proportional to this case. Plaintiff further objects to this Interrogatory because it seeks information more readily obtained by other means, including by way to deposition testimony and/or document discovery. Plaintiff further objects to this Interrogatory to the extent it is intended to harass Plaintiff, and constitutes an invasion of privacy. Plaintiff further objects to this Interrogatory as calling for information that is neither relevant nor proportional to this case.

Subject to and without waiving the foregoing objections, Plaintiff identifies the divorce settlement with Ms. Heard. As Ms. Heard is a party to that agreement, Mr. Depp will not further describe that agreement. Plaintiff also identifies the Settlement Agreement with Ms. Vanessa Paradis with respect to the parentage, custody and support of their two minor children, Lily-Rose Depp and [REDACTED]. No agreements with any Romantic Partners have ever been negotiated in order to gain the assistance or compliance of another person and/or entity with regard to this matter.

14. Identify and describe facts relating to each instance where any person, other than Ms. Heard, 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 at the time of the alleged incident.

ANSWER:

In addition to the foregoing General Objections and Objections to Definitions and Instructions, Plaintiff objects to this Interrogatory as overly broad and unduly burdensome, and to the extent that it seeks the information protected by the attorney-client privilege, the work product doctrine, or any other applicable privilege, immunity, or protection. Plaintiff further objects to this Interrogatory as calling for information that is neither relevant nor proportional to this case. Plaintiff further objects to this Interrogatory because it assumes facts not in evidence, and characterizes Plaintiff as engaging in acts of violence. Plaintiff denies any allegation that he engaged in an act of violence. Plaintiff further objects to this Interrogatory because it seeks information more readily obtained by other means, including by way to deposition testimony and/or document discovery. Plaintiff further objects to this Interrogatory to the extent it is intended to harass Plaintiff, and constitutes an invasion of privacy.

In addition to the foregoing General Objections and Objections to Definitions and Instructions, Plaintiff objects to this Interrogatory as premature given the early stage of discovery.

In light of the foregoing objections, Plaintiff will respond to this Interrogatory in accordance with his obligations under a Stipulation and Order Governing Expert Discovery in this Action and according to a schedule to be agreed upon by the parties or entered by the Court.

16. State in detail all facts which support and/or otherwise relate to any claim for monetary relief as part of this matter. Include in Your answer: (i) an itemization of all damages, loss or injury for which You are claiming or seeking to recover in this action—including each and every employment opportunity which You claim You have lost as a result of the actions complained of; (ii) an explanation of how the damages were computed; (iii) all assumptions made in computing the damages, and the basis for such assumptions; (iv) an explanation of how the damages are attributable to Defendant; and (v) all efforts to mitigate the damages.

ANSWER:

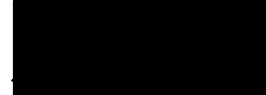
In addition to the foregoing General Objections and Objections to Definitions and Instructions, Plaintiff objects to this Interrogatory as overly broad and unduly burdensome, and to the extent that it seeks the information protected by the attorney-client privilege, the work product doctrine, or any other applicable privilege, immunity, or protection. Plaintiff further objects to this Interrogatory because it seeks information more readily obtained by other means, including by way to deposition testimony and/or document discovery. Plaintiff further objects to this Interrogatory because it would be more appropriately addressed by other means including expert discovery.

In light of the foregoing objections, Plaintiff will not be responding to this Interrogatory at this time, and reserves his right to supplement this response to the extent necessary following the completion of fact and expert discovery.

17. 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

Dated: October 28, 2019

Respectfully submitted,



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

- and -

Robert B. Gilmore (*pro hac vice*)
Kevin L. Attridge (*pro hac vice*)
STEIN MITCHELL BEATO & MISSNER LLP
901 15th Street NW, Suite 700
Washington, DC 20005
Phone: (202) 601-1589
Fax: (202) 296-8312
rgilmore@steinmitchell.com

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

Counsel for Plaintiff John C. Depp, II

CERTIFICATE OF SERVICE

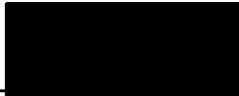
I hereby certify that on this 28th day of October 2019, I caused copies of the foregoing to be served via email (per written agreement between the Parties) on the following:

Roberta A. Kaplan (*pro hac vice*)
Julie E. Fink (*pro hac vice*)
John C. Quinn (*pro hac vice*)
Joshua Matz (*pro hac vice*)
KAPLAN HECKER & FINK, LLP
350 Fifth Avenue, Suite 7110
New York, New York 10118
Telephone: (212) 763-0883
rkaplan@kaplanhecker.com
jfink@kaplanhecker.com
jqquinn@kaplanhecker.com
jmatz@kaplanhecker.com

Eric M. George (*pro hac vice*)
Richard A. Schwartz (*pro hac vice*)
BROWNE GEORGE ROSS LLP
2121 Avenue of the Stars, Suite 2800
Los Angeles, California 90067
Telephone: (310) 274-7100
Facsimile: (310) 275-5697
egeorge@bgrfirm.com
rschwartz@bgrfirm.com

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

Counsel for Defendant Amber Laura Heard


Benjamin G. Chew

CERTIFICATION

I hereby certify under penalty of perjury that the contents of the foregoing are true and accurate to the best of my knowledge, information and belief.

Dated: 28 Oct., 2019

Location: _____



John C. Depp 

and when Plaintiff has already reviewed and coded a significant number of documents based on Defendant's first and second requests of production

In light of the foregoing objections, Plaintiff will produce his contracts for acting or producing or other services, his fees, and production reports, if any, that are located after a reasonable search.

4. All documents and/or communications, from 2010 to the present, authored, written transmitted, sent, or received by Mr. Depp containing discussion of or language reflecting misogyny, sexism, hatred of women, racism, homophobia, rape, violence toward women, abuse of women, and/or killing women.

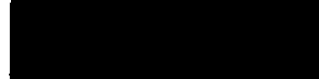
RESPONSE:

In addition to the foregoing General Objections and Objections to Definitions and Instructions, Plaintiff objects to this Request as overly broad and unduly burdensome. Plaintiff further objects to this Request to the extent it seeks "all" documents and communications from 2010 to present regarding many broad topics without any reasonable limitation in scope. Plaintiff further objects to this Request as unlikely to lead to the discovery of admissible evidence and that it seeks documents and communications that are irrelevant, immaterial, or unnecessary to the issues in this Action. Plaintiff further objects to this Request to the extent it is intended to harass Plaintiff, and constitutes an invasion of privacy. Plaintiff further objects to this Request to extent that it seeks broad categories of documents and communications at a time when Plaintiff has already collected and run search terms through documents, and when Plaintiff has already reviewed and coded a significant number of documents based on Defendant's first and second requests of production. Plaintiff further objects to this Interrogatory as unreasonably cumulative and duplicative of Defendant's First and Second Requests for Production, and for which Plaintiff has agreed to produce responsive documents.

In light of the foregoing objections, Plaintiff will not produce any documents in response to this Request other than documents Plaintiff has already agreed to produce in response to Defendant's First and Second Requests for Production.

Dated: December 20, 2019

Respectfully submitted,



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

- and -

Robert B. Gilmore (*pro hac vice*)
Kevin L. Attridge (*pro hac vice*)
STEIN MITCHELL BEATO & MISSNER LLP
901 15th Street NW, Suite 700
Washington, DC 20005
Phone: (202) 601-1589
Fax: (202) 296-8312
rgilmore@steinmitchell.com

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

Counsel for Plaintiff John C. Depp, II

CERTIFICATE OF SERVICE

I hereby certify that on this 20th day of December 2019, I caused copies of the foregoing to be served via email (per written agreement between the Parties) on the following:

Roberta A. Kaplan (*pro hac vice*)
Julie E. Fink (*pro hac vice*)
John C. Quinn (*pro hac vice*)
KAPLAN HECKER & FINK, LLP
350 Fifth Avenue, Suite 7110
New York, New York 10118
Telephone: (212) 763-0883
rkaplan@kaplanhecker.com
jfink@kaplanhecker.com
jqinn@kaplanhecker.com

Dauida Brook (*pro hac vice*)
SUSMAN GODFREY LLP
1900 Avenue of the Stars
Suite 1400
Los Angeles, California
Telephone: (310) 789-3105
dbrooke@susmangodfrey.com

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

Timothy J. McEvoy, Esq. (VSB No. 33277)
Sean Patrick Roche, Esq. (VSB No. 71412)
CAMERON/McEVOY, PLLC
4100 Monument Corner Drive, Suite 420
Fairfax, Virginia 22030
Telephone: (703) 273-8898
Facsimile: (703) 273-8897
tmcevoy@cameronmcevoy.com
sroche@cameronmcevoy.com

Counsel for Defendant Amber Laura Heard


Benjamin G. Chew