

VIRGINIA:

IN THE CIRCUIT COURT OF FAIRFAX COUNTY

JOHN C. DEPP, II,

Plaintiff and Counter-defendant,

v.

AMBER LAURA HEARD,

Defendant and Counter-plaintiff.

Civil Action No.: CL-2019-0002911

MOVED
2020 SEP 23 AM 11:48
JOHN T. FREY
CLERK, CIRCUIT COURT
FAIRFAX, VA

**DEFENDANT AMBER LAURA HEARD'S MEMORANDUM IN SUPPORT OF
HER MOTION TO COMPEL DEPOSITION OF JOHN C. DEPP II, PRODUCTION OF
DOCUMENTS IN RESPONSE TO DEFENDANT'S NINTH
REQUEST FOR PRODUCTION OF DOCUMENTS, AND FOR SANCTIONS**

September 23, 2020

Elaine Charlson Bredehoft (VSB No. 23766)
Adam S. Nadelhaft (VSB No. 91717)
David E. Murphy (VSB No. 90938)
Charlson Bredehoft Cohen & Brown, P.C.
11260 Roger Bacon Drive, Suite 201
Reston, Virginia 20190
Telephone: (703) 318-6800

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

Counsel to Defendant Amber Laura Heard

Defendant is forced to bring this motion after extensive efforts to obtain the deposition of Plaintiff, even after providing a two-month Notice of Deposition, asking for locations and dates for Mr. Depp prior to his filming, seeking discovery to ascertain Mr. Depp's exact filming schedule, and finally being told that the Plaintiff in this action, suing Defendant for \$50 million, will not make himself available for deposition until the filming of *Fantastic Beasts* is complete, sometime late February 2021, or possibly later. Mr. Depp relies upon the letter from a Warner Bros. Associate counsel claiming Mr. Depp is needed from September 17 through the completion of filming, to remain in the UK. Meanwhile, disproving the veracity of the letter, Mr. Depp is traveling around Europe and attending film festivals, each of which includes quarantine periods. Yet Mr. Depp is refusing to return to the US, where there is no quarantine requirement for his deposition. Mr. Depp is also refusing to produce any documents responsive to the 9th RFPs, which are focused on when Mr. Depp learned of the filming schedule (Warner Bros. admitted he would have been contacted in late June or July), the efforts Mr. Depp made to schedule his filming around his deposition and trial (none), and his exact filming schedule, so that Mr. Depp and counsel for Defendant could potentially work around the filming schedule (Warner Bros. declined to provide that filming schedule, despite two requests).

Defendant is entitled to depose Plaintiff at this point in the litigation, rather than wait until the end, to fully discover the facts Plaintiff is asserting, damages Plaintiff is claiming, determine further witnesses to be deposed, what discovery to pursue, and experts to retain. This cannot be accomplished at the end of discovery, two months before trial. There would be no time for issuing discovery, setting up and taking depositions, or retaining and disclosing experts.

Plaintiff cannot simply decide he is unavailable for deposition in a case he chose to bring in Virginia, because of his work schedule. Imagine if this Court recognized and legitimized such

an “excuse” for all litigants in Virginia. It is incumbent upon Plaintiff to be reasonably available for his deposition and discovery obligations, and trial. If Plaintiff is unable to attend his deposition as noticed, especially given a two-month notice and making NO effort to reschedule the deposition before leaving for filming or anytime during the general filming when he is not filming, then Plaintiff’s Complaint should be dismissed. Defendant should not have needed to bring this Motion – Plaintiff’s counsel should have worked with counsel for Defendant months ago to schedule this deposition. Defendant is also requesting attorneys’ fees and costs for having to bring this motion, and to compel Plaintiff to fully respond to the 9th RFPs.

ARGUMENT

On August 7, 2020, Plaintiff was properly noticed for deposition in Virginia.¹ **Att. 1.** Plaintiff was invited to inform of any conflicts or alternative dates. **Att. 2.** Plaintiff has not objected to locations or dates, has provided no alternative dates or objected to the suggested protocol, and has not filed any protective order for his deposition.² Counsel for Defendant learned through Warner Bros., not through Plaintiff, that Plaintiff had no intention of appearing at his deposition. This has since been confirmed by Plaintiff, that Plaintiff will not be produced for deposition until after *Fantastic Beasts 3* has completed filming, currently anticipated to be in mid-to-late February. Thus, Plaintiff’s position is that he does not need to appear for deposition

¹ Plaintiff testified in the UK for 4 days, not including the substance of his 4 Witness Statements. He testified lethargically, causing defense counsel to assess that up to 5 days may be required if he talks and moves in a similar manner, and thought it was best to simply reserve 5 days, with the hope that Mr. Depp would be motivated to speak and move more quickly to finish the deposition much sooner. Notwithstanding, counsel for Defendant has since asked Plaintiff to block off 3 days, and if more is needed, we can revisit and schedule at a later time.

² While not responding to any of the 20 suggested depositions and dates, Plaintiff instead (without consultation with counsel for Defendant) issued a subpoena for Elon Musk’s deposition on one of the dates Defendant suggested for another witness. **Att. 3.**

for seven months – from early August, when his deposition was first requested, through February, and will not agree to be deposed within two years of filing his Complaint.

When parties to litigation face conflicts, it is incumbent upon them to find solutions such that the judicially scheduled dates are prioritized for the effective administration of Justice. Yet Plaintiff made no effort whatsoever. After counsel for Defendant received no response to her questions about those efforts, **Att. 4, 5**, she proactively reached out to Warner Bros. counsel. **Att. 6.** According to Warner Bros., Plaintiff had been contacted in late June or July with the new filming dates, yet he did not alert Warner Bros. to the dates of his deposition (or trial, prior to it being continued). Plaintiff determined that, rather than speak with his employer to work his filming commitments around his deposition (Plaintiff is not filming throughout the entire five months – he has periods off, including during the holidays and is traveling around Europe during these dates), and though he is the Plaintiff in this action, he asks this Court and the Defendant to subserviently reschedule around his employment and the entire film schedule and production.

Plaintiff has refused to respond to Defendant's questions or provide any information on when Plaintiff first learned of the filming schedule, Plaintiff's efforts to schedule around his deposition and trial, and Plaintiff's time off during the filming. **Atts. 3, 4.** After Plaintiff refused to respond to these reasonable questions, Defendant issued expedited discovery requests. **Att. 7, 8.** Plaintiff did not respond to the email request for information for a meet and confer, did not expedite any responses, and refused to produce any documents. **Att. 9.** Defendant learned that, contrary to Plaintiff's representations to this Court, Plaintiff was aware well before the August 19 letter (in late June or July) and Plaintiff requested the letter from Warner Bros – it was not sent in the ordinary course of business. Counsel for Defendant then reached out and asked Plaintiff's counsel for all dates between August 26 and October 1 when Plaintiff would be

available for deposition. Plaintiff only suggested they were looking at London in late September by WebEx, but never provided any specifics, and never followed up at all. **Att. 10.**

This Court should not condone nor begin a precedent that a Plaintiff who chooses to bring an action in this Court will be entitled to continuances based on work schedules, particularly where Plaintiff has made no effort to work around the film schedule, is traveling around Europe to attend film festivals, provided no evidence of efforts to adjust his work schedule, and is eschewing his deposition without even telling or working with counsel for Defendant. Nor should this Court determine that an actor – who chose not to bring this case in California – is more important than any other employee in Virginia and should receive special consideration.

This is especially true where Plaintiff produced a letter from Warner Bros., claiming “we require Mr. Depp to be in the United Kingdom from September 17th through the anticipated end of production in mid-February 2021.” **Att. 11.**³ Yet we know this is not true, because Mr. Depp wasted no time in travelling to Spain this past weekend, after September 17, to appear at a Film Festival, **Att. 13**, and then is travelling to Switzerland in early October, almost at the same time he is scheduled to be in Virginia for his deposition. **Att. 14.** And though Mr. Depp would not be required to quarantine in the United States, he is required to quarantine for Spain and Switzerland and in all cases for the return to the UK. **Att. 15.** Therefore, the burden of traveling to the US is less than Mr. Depp’s planned travel to Spain and Switzerland in the same timeframe.

Defendant is severely prejudiced by Plaintiff’s refusal to appear for deposition as noticed and instead at the end of the discovery period. The purpose of depositions is to learn of the facts

³ Counsel for Defendant followed up on this letter by requesting Mr. Depp’s specific film schedule. **Att. 12.** To date, Mr. Smith has not responded and not provided Mr. Depp’s film schedule.

supporting the claims, both for liability, as well as damages. Many depositions are being scheduled in California, which will necessarily be *de bene esse*. Thus, the opportunity to learn what Mr. Depp claims are facts and damages, then obtain information from those individuals to potentially impeach those facts will be severely curtailed by having to take those depositions before the Plaintiff has been deposed. Moreover, it will be virtually impossible to retain expert witnesses and provide them with sufficient information prior to their disclosure deadlines.

Plaintiff has not taken his responsibilities as the moving party seriously. This Court should take strong action to send a message to Plaintiff, and all litigants, who treat the judicial system in so cavalier and disrespectful a manner.


CONCLUSION

Defendant Ms. Heard respectfully requests entry of an Order granting appropriate relief and sanctions, to include the dismissal of the Complaint, with prejudice, compelling production of the 9th RFPs, compelling Plaintiff Mr. Depp to appear for three successive days in counsel for Defendant's offices in Virginia on or before October 30, 2020 on dates and times agreeable to counsel for Defendant, and to award fees and costs to Defendant for having to bring this motion.

Dated this 23rd day of September 2020.

Respectfully submitted,

Amber L. Heard



Elaine Charlson Bredehoft (VSB No. 23766)
Adam S. Nadelhaft (VSB No. 91717)
David E. Murphy (VSB No. 90938)
Charlson Bredehoft Cohen & Brown, P.C.
11260 Roger Bacon Drive, Suite 201
Reston, Virginia 20190
Telephone: (703) 318-6800
ebredehoft@cbcblaw.com
anadelhaft@cbcblaw.com
dmurphy@cbcblaw.com

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

Counsel to Defendant Amber Laura Heard

CERTIFICATE OF SERVICE

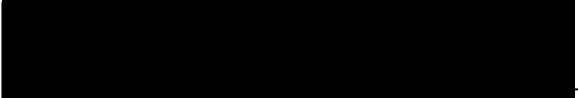
I certify that on this 23rd day of September 2020, a copy of the foregoing shall be served by via email, pursuant to the Agreed Order dated August 16, 2019, as follows:

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

Counsel for Plaintiff John C. Depp, II


Elaine Charlson Bredehoff (VSB No. 23766)

ATTACHMENT 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

NOTICE OF DEPOSITION BY VIDEO

PLEASE TAKE NOTICE that the Defendant, Amber Laura Heard, by counsel, will take the videotaped deposition upon oral examination of JOHN C. DEPP, II beginning at 9:30 a.m. on October 5, and each day at 9:30 a.m. through October 9, 2020, to be continued further if necessary and not completed. The deposition will be held at the offices of Charlson Bredehoft Cohen & Brown, P.C., 11260 Roger Bacon Drive, Suite 201, Reston, Virginia 20190. The deposition will be taken before an officer authorized by law to administer oaths and take testimony and will be transcribed by a certified Court Reporter and videographer. The deposition will continue until concluded, and will be used for all lawful purposes.

Dated this 7th day of August 2020

Respectfully submitted,

Amber L. Heard



Elaine Charlson Bredehoft (VSB No. 23766)
Carla D. Brown (VSB 44803)
Adam S. Nadelhaft (VSB No. 91717)
David E. Murphy (VSB No. 90938)
Charlson Bredehoft Cohen & Brown, P.C.
11260 Roger Bacon Drive, Suite 201
Reston, Virginia 20190
Telephone: (703) 318-6800
Facsimile: (703) 318-6808
ebredehoft@cbcblaw.com
cbrown@cbcblaw.com
anadelhaft@cbcblaw.com
dmurphy@cbcblaw.com

J. Benjamin Rottenborn, Esq.
Joshua R. Treece, Esq.
Woods Rogers PLC
10 S. Jefferson Street, Suite 1400
P.O. Box 14125
Roanoke, Virginia 24011
broddenborn@woodsrogers.com
jtreece@woodsrogers.com

Counsel to Defendant Amber Laura Heard

CERTIFICATE OF SERVICE


I certify that on this 7th day of August 2020, a copy of the foregoing shall be served by email, pursuant to agreement and Court Order, as follows:

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

Counsel for Plaintiff John C. Depp, II



Elaine Charlson Bredehoff (VSB No. 23766)
Carla D. Brown (VSB 44803)
Adam S. Nadelhaft (VSB No. 91717)
David E. Murphy (VSB No. 90938)
Charlson Bredehoff Cohen & Brown, P.C.
11260 Roger Bacon Drive, Suite 201
Reston, Virginia 20190
Telephone: (703) 318-6800
Facsimile: (703) 318-6808
ebredehoff@cbcblaw.com
cbrown@cbcblaw.com
anadelhaft@cbcblaw.com
dmurphy@cbcblaw.com

ATTACHMENT 2

Elaine Bredehoft

From: Elaine Bredehoft
Sent: Friday, August 07, 2020 4 24 PM
To: bchew@brownrudnick.com, Vasquez, Camille M.
Cc: brottenborn@woodsrogers.com, Treece, Joshua, Adam Nadelhaft, David Murphy, Leslie Hoff, Michelle Bredehoft, awaldman@theendeavorgroup.com
Subject: Deposition scheduling, Notice of Deposition, and suggested Protocol
Attachments: Notice of Dep Depp 8-7-20.pdf

TimeMattersID: MBFF3AC3997ED876
TM Contact: Heard, Amber
TM Matter No: 20-5294
TM Matter Reference: Heard, Amber

Ben and Camille:

Given the fast-impending trial date and the deadlines associated with the trial date, we would like to take a significant portion of the depositions during the months of September and October, beginning immediately after the Labor Day weekend.

Many of these depositions will be taken in California. We recognize in light of COVID-19, we will need to cooperate fully, respect the legitimate concerns of deponents and counsel, and develop protocol to handle these depositions to maximize fairness and protections.

We would like to take the deposition of the Plaintiff, Mr. Depp, the week of October 5. We would like to set the entire week aside for his deposition. After watching him on the stand in London, I believe this is a reasonable amount of time for his deposition. Under the Rules, he is required to appear in our offices for his deposition. However, if the COVID-19 threat remains, and he is not comfortable appearing in person, then we will agree to take his deposition remotely, but it will have to be under the circumstances and protocols set forth below.

Towards that end, I am attached a Notice of Deposition for Mr. Depp. I will be happy to work with you on this.

With respect to the other depositions, we would like to schedule the following during the month of September, beginning after September 8, 2020. I am suggesting dates, and would like you to let me know if you and your team have any conflicts with these dates. I plan to issue the subpoenas for those requiring subpoenas next week, so I would appreciate your letting me know your conflicts as soon as possible. I have doubled up where I believe we can take more than one in a day:

September 8, 2020: Brandon Patterson, Corporate Designee of ECB (9:00 a.m.; 1:00 p.m.)
September 9, 2020: Sean Bett (I understand you have agreed to accept service for him, and assuming you have produced the documents from his subpoena in sufficient time);
September 10, 2020: Stephen Deuters (same as above with Sean Bett);

September 11, 2020 Christy Dembrowski (assuming she has complied fully with the subpoenas duces teca by that time);
September 14, 2020 – LAPD Corporate Designee
September 15, 2020 - Officer Melissa Saenz, Officer Tyler Hadden;
September 16, 2020 – Ben King
September 17, 2020 – Robin Baum
September 18, 2020 – Malcolm Connolly; Nathan Holmes
September 21, 2020 – Trinity Esparza; Cornelius Harrell
September 22, 2020 – Joel Mandel
September 23, 2020 – Laura Wasser, Corporate Designee Wasser, Cooperman & Mandles
September 24, 2020 – Samantha McMillen
September 25, 2020 – CJ Roberts, Tara Roberts
September 28, 2020 – Edward White; Corporate Designee for Edward White;
September 29, 2020 – Keenan Wyatt
September 30, 2020 – Alejandro Romero; Laura Divenere

We obviously need to take more depositions, but we will await your supplementation to determine who, what, where and why.

On protocols: Please tell us which depositions you will attend in person. For any deposition you attend in person, we will also be present. If you do not tell us within 2 business days of our issuing the Notices or Subpoenas, we will ASSUME you intend to attend in person. We will provide you exactly the same courtesy. We need this much time, because of scheduling flights. If you do not inform us within 2 days, and inform us differently later, we will request reimbursement for any costs associated with the change and/or increase in flights and accommodations and will seek these from the Court in the event of disagreement. We will agree to the same standards on our end.

We will require the deponent to have the court reporter and the videographer present in the same room with the deponent regardless of whether counsel is remote. They can practice social distancing, and wear masks, but we need to ensure the deponent is free of any type of device to assist them in a manner which would be prohibited. If there are exceptions because of remoteness, we should discuss those asap and work out a mutually agreeable solution.

Please let me know as soon as possible whether any of these dates do not work for you and alternative dates in that event, and whether you represent any of the individuals (other than Mr. Depp, Mr. Betts and Mr. Deuters) so we can send you the Notice rather than issue subpoenas, and work directly through you on those.

Please also let me know as soon as possible whether you are in agreement with the suggested protocol, and if not, your suggested alternative protocols.

Thank you for your anticipated cooperation. We have a very intensive five months ahead of us before trial. I am hopeful we can work together in a professional manner to accomplish the objectives of both sides.

Elaine

Elaine Charlson Bredehoft
Charlson Bredehoft Cohen & Brown, P.C.
11260 Roger Bacon Drive
Suite 201
Reston, VA 20190
(703) 318-6800
(703) 919-2735 (mobile)
(703) 318-6808 (fax)
www.cbcbllaw.com

VIRGINIA:

IN THE CIRCUIT COURT OF FAIRFAX COUNTY

JOHN C. DEPP, II,

Plaintiff,

v.

AMBER LAURA HEARD,

Defendant

Civil Action No.: CL-2019-0002911

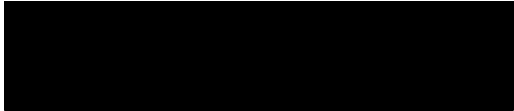
NOTICE OF DEPOSITION BY VIDEO

PLEASE TAKE NOTICE that the Defendant, Amber Laura Heard, by counsel, will take the videotaped deposition upon oral examination of JOHN C. DEPP, II beginning at 9.30 a.m. on October 5, and each day at 9:30 a.m. through October 9, 2020, to be continued further if necessary and not completed. The deposition will be held at the offices of Charlson Bredehoff Cohen & Brown, P.C., 11260 Roger Bacon Drive, Suite 201, Reston, Virginia 20190. The deposition will be taken before an officer authorized by law to administer oaths and take testimony and will be transcribed by a certified Court Reporter and videographer. The deposition will continue until concluded, and will be used for all lawful purposes.

Dated this 7th day of August 2020

Respectfully submitted,

Amber L. Heard



Elaine Charlson Bredehoft (VSB No. 25786)
Carla D. Brown (VSB 44803)
Adam S. Nadelhaft (VSB No. 91717)
David E. Murphy (VSB No. 90938)
Charlson Bredehoft Cohen & Brown, P.C.
11260 Roger Bacon Drive, Suite 201
Reston, Virginia 20190
Telephone: (703) 318-6800
Facsimile: (703) 318-6808
ebredehoft@cbeblaw.com
cbrown@cbeblaw.com
anadelhaft@cbeblaw.com
dmurphy@cbeblaw.com

J Benjamin Rottenborn, Esq.
Joshua R. Treece, Esq
Woods Rogers PLC
10 S. Jefferson Street, Suite 1400
P O. Box 14125
Roanoke, Virginia 24011
brottenborn@woodsrogers.com
jtreece@woodsrogers.com

Counsel to Defendant Amber Laura Heard

CERTIFICATE OF SERVICE

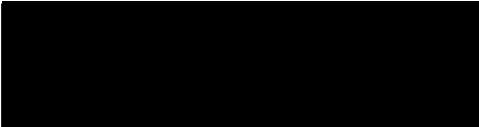
I certify that on this 7th day of August 2020, a copy of the foregoing shall be served by email, pursuant to agreement and Court Order, as follows:

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

Counsel for Plaintiff John C. Depp, II



Elaine Charlson Bredehoff (VSB No. 23766)
Carla D. Brown (VSB 44893)
Adam S. Nadelhaft (VSB No. 91717)
David E. Murphy (VSB No. 90938)
Charlson Bredehoff Cohen & Brown, P.C.
11260 Roger Bacon Drive, Suite 201
Reston, Virginia 20190
Telephone: (703) 318-6800
Facsimile: (703) 318-6808
ebredehoff@cbcbllaw.com
cbrown@cbcbllaw.com
anadelhaft@cbcbllaw.com
dmurphy@cbcbllaw.com

ATTACHMENT 3

brownrudnick

BENJAMIN G. CHEW
direct dial 202 536 1785
bchew@brownrudnick.com

August 13, 2020

VIA HAND DELIVERY

Mr. John T. Frey, Clerk
Fairfax County Circuit Court
4110 Chain Bridge Road, Suite 320
Fairfax, Virginia 22030

RE: *John C. Depp, II v. Amber Laura Heard,*
Case No. CL-2019-0002911
Subpoena: Elon Musk

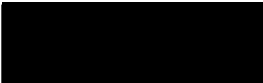
Dear Mr. Frey,

Please find enclosed an original attorney-issued foreign subpoena for deposition of third party witness Elon Musk issued pursuant to Virginia Code Section 8.01-412.10 and California Civil Procedure Code Section 2029.100 et seq. The enclosed deposition subpoena has been issued in accordance with both Acts and the reciprocal privileges included therein.

The enclosed documents will be served by private process server. Please file these documents with the Court's papers in this case and return a file-stamped copy of the same in the enclosed self-addressed envelope. Thank you for your assistance.

Regards,

BROWN RUDNICK LLP


Benjamin G. Chew VSB# 29113

Enclosures

VIRGINIA:

IN THE CIRCUIT COURT OF FAIRFAX COUNTY, VIRGINIA

JOHN C. DEPP, II	:	
	:	
Plaintiff,	:	
	:	
v.	:	Civil Action No.: CL-2019-0002911
	:	
AMBER LAURA HEARD	:	
	:	
Defendant.	:	

CERTIFICATE OF SERVICE

I hereby certify that I caused a true and correct copy of the enclosed Subpoena/Subpoena Duces Tecum to Person Under Foreign Subpoena and Deposition Subpoena for Personal Appearance and Production of Documents, Electronically Stored Information, and Things in Action Pending Outside California to CPLR 3119 to be sent via email (per written agreement between the Parties), on this 13th day of August 2020, to counsel of record.


Benjamin G. Chew (VSB No. 29113)

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

Benjamin G. Chew (VSB No. 29113)
Andrew C. Crawford (VSB No. 89093)
BROWN RUDNICK LLP
601 Thirteenth Street, N.W.
Washington, DC 20005
Telephone: (202) 536-1700
Facsimile: (202) 536-1701
bchew@brownrudnick.com
acrawford@brownrudnick.com

Adam R. Waldman (*pro hac vice*)
THE ENDEAVOR LAW FIRM, P.C.
1775 Pennsylvania Avenue, N.W.
Washington, DC 20006
Telephone: (202) 715-0966
Facsimile: (202) 715-0964
awaldman@theendeavorgroup.com

Counsel for Plaintiff John C. Depp, II

SERVICE LIST

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

Elaine Charlson Bredehoft (VSB No. 23766)
Carla D. Brown (VSB No. 44803)
Adam S. Nadelhaft (VSB No. 91717)
David E. Murphy (VSB No. 90938)
Charlson Bredehoft Cohen & Brown, P.C.
11260 Roger Bacon Drive, Suite 201
Reston, VA 20190
Telephone: (703) 318-6800
Facsimile: (703) 318-6808
ebredehoft@cbcblaw.com
cbrown@cbcblaw.com
anadelhaft@cbcblaw.com
dmurphy@cbcblaw.com

Counsel for Defendant Amber Laura Heard

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

File No. **CL-2019-0002911**

Commonwealth of Virginia VA CODE §§ 8 01-412 8—8 01-412 15; Rule 4 9

FAIRFAX COUNTY

Circuit Court

4110 CHAIN BRIDGE ROAD, FAIRFAX, VIRGINIA 22030

ADDRESS OF COURT

JOHN C. DEPP, II

v./In re:

AMBER LAURA HEARD

TO THE PERSON AUTHORIZED BY LAW TO SERVE THIS PROCESS:

You are commanded to summon

ELON MUSK

NAME

10911 CHALON ROAD

STREET ADDRESS

LOS ANGELES

CITY

CA

STATE

90077

ZIP

TO THE PERSON SUMMONED: You are commanded to

attend and give testimony at a deposition

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

See Attachment A

at **Brown Rudnick LLP**
2211 Michelson Drive, 7th Floor, Irvine, CA 92612 at **September 23, 2020 at 10:00 a.m.**

LOCATION

DATE AND TIME

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

permit inspection of the premises

at the following location

LOCATION

on **DATE AND TIME**

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

John C. Depp, II

NAME OF REQUESTING PARTY

c/o Benjamin G. Chew, 601 Thirteenth Street, N.W., Suite 600

STREET ADDRESS

Washington

CITY

DC

STATE

20005

ZIP

(202) 536-1700

TELEPHONE NUMBER

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

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

DATE ISSUED _____ CLERK _____
by _____ DEPUTY CLERK _____

Benjamin G. Chew [REDACTED] 13/20 29113 VA
NAME OF ATTORNEY FOR REQUESTING PARTY BAR NUMBER LICENSING STATE
601 Thirteenth Street, N.W., Suite 600 (202) 536-1700
OFFICE ADDRESS TELEPHONE NUMBER OF ATTORNEY
Washington, DC 20005 (202) 536-1701
OFFICE ADDRESS FACSIMILE NUMBER OF ATTORNEY

NAME BAR NUMBER LICENSING STATE
STREET ADDRESS TELEPHONE NUMBER
STREET ADDRESS FACSIMILE NUMBER

NAME BAR NUMBER LICENSING STATE
STREET ADDRESS TELEPHONE NUMBER
STREET ADDRESS FACSIMILE NUMBER

NAME BAR NUMBER LICENSING STATE
STREET ADDRESS TELEPHONE NUMBER
STREET ADDRESS FACSIMILE NUMBER

RETURN OF SERVICE (see page three of this form)

The names, addresses and telephone numbers of all counsel of record in the proceeding to which the subpoena relates and of parties not represented by counsel are:

Benjamin G. Chew (VSB No. 29113)
Andrew C. Crawford (VSB No. 89093)
BROWN RUDNICK LLP
601 Thirteenth Street, N.W., Suite 600
Washington, D.C. 20005
Telephone: (202) 536-1700
Facsimile: (202) 536-1701
bchew@brownrudnick.com
acrawford@brownrudnick.com

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

Adam R. Waldman (*pro hac vice*)
THE ENDEAVOR LAW FIRM, P.C.
1775 Pennsylvania Avenue, N.W., Suite 350
Washington, D.C. 20006
Telephone: (202) 715-0966
Facsimile: (202) 715-0964
awaldman@theendevorgroup.com

Counsel for Plaintiff John C. Depp, II

SERVICE LIST

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

Elaine Charlson Bredehoft (VSB No. 23766)
Carla D. Brown (VSB No. 44803)
Adam S. Nadelhaft (VSB No. 91717)
David E. Murphy (VSB No. 90938)
Charlson Bredehoft Cohen & Brown, P.C.
11260 Roger Bacon Drive, Suite 201
Reston, VA 20190
Telephone: (703) 318-6800
Facsimile: (703) 318-6808
ebredchoft@cbcblaw.com
cbrown@cbcblaw.com
anadelhaft@cbcblaw.com
dmurphy@cbcblaw.com

Counsel for Defendant Amber Laura Heard

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

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

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

1 ATTACHMENT A

2 DEFINITIONS

3 1. "YOU" and/or "YOUR" shall mean and refer to Elon Musk.

4 2. "COMMUNICATION" and/or "COMMUNICATIONS" shall mean and refer to
5 any written and verbal exchanges between any person or persons or entities, including but not
6 limited to verbal conversations, telephone calls, letters, e-mails, memoranda, reports, telegraphs,
7 faxes, exhibits, drawings, text messages, and any other documents which confirm or relate to the
8 written or verbal exchange, including applicable ELECTRONICALLY STORED
9 INFORMATION.

10 3. "ELECTRONICALLY STORED INFORMATION" means data that is stored in an
11 electronic medium and shall include, by way of example only, computer programs, electronic mail
12 (including message contents, header information and logs of electronic mail usage), output
13 resulting from the use of any software program, including electronic, digital, or any other recorded
14 material whatsoever, including but not limited to, any notes, memoranda, videotapes, affidavits,
15 statements, papers, files, forms, data, tapes, printouts, letters, reports, communications, contracts,
16 agreements, telegrams, records, financial records, applications, correspondence, diaries, calendars,
17 recordings and transcriptions of recordings, voice mail messages recorded electronically and in
18 writing, email messages and printouts, photographs, diagrams, or any other writings, however
19 produced or reproduced, word processing documents, spreadsheets, databases, telephone logs,
20 contact manager information, Internet usage files, PDF files, .JPG files, .TIF files, .TXT files,
21 batch files, ASCII files, and any and all miscellaneous files and data and shall include all active
22 data, deleted data, file fragments, metadata, native file formats and forensic images thereof.

23 4. "DEFAMATION ACTION" shall mean and refer to the action entitled *John C.*
24 *Depp II v. Amber Laura Heard*, Circuit Court of Fairfax County Virginia Civil Action No. CL-
25 2019-0002911.

26 5. "DIVORCE ACTION" shall mean and refer to the action entitled *In re the*
27 *Marriage of Amber Laura Depp and John Christopher Depp II*, Los Angeles Superior Court Case
28 No. BD641052.

1 12. All undefined terms shall be interpreted according to their plain and commonsense
2 meaning.

3 13. DOCUMENTS should be produced as single page .tiff format files imaged at 300
4 dpi, with the exception of stand-alone Databases (e g , Access), spreadsheets (e g , Excel), slide
5 presentations (e.g , PowerPoint), video files, and audio files, which should be produced in native
6 format. Each .tiff file should have a unique name matching the Bates number labeled on the
7 corresponding page. Color DOCUMENTS should be produced in color.

8 14. DOCUMENTS should be produced with (a) a delimited data file (.dat), and (b) an
9 image load file (opt and/or .lfp). Each .tiff in a production must be referenced in the
10 corresponding image load file. The total number of documents referenced in a production's data
11 load file should match the total number of designated document breaks in the image load file for
12 the production.

13 15. DOCUMENTS should be produced with extracted metadata for each DOCUMENT
14 in the form of a .dat file. The metadata should include the following fields, to the extent such
15 fields are available in the original DOCUMENT as it originally existed in its native format:

Field	Description
Bates_Begin	The bates label of the first page of the document
Bates_End	The bates label of the last page of the document
Attach_Begin	The bates label of the first page of a family of documents (e.g., email and attachment)
Attach_End	The bates label of the last page of a family of documents
Sent_Date	For email, the sent date of the message
Sent_Time	For email, the sent time of the message converted to GMT
Email_Author	The sender of an email message (email FROM)
Recipient	The recipients of an email message (email TO)

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

CC	The recipients of a copy of an email message (email CC)
BCC	The recipients of a blind copy of an email message (email BCC)
Custodian	The custodian in whose file the document was found, including all duplicate custodians
Datercvd	Date received
Datesent	Date sent
Subject	E-mail subject
Author	The person who created the document
Modifier	The person who last modified the document
Created	The creation date of the document
Last_Modified	The last modified date of the document
Title	The title of the document
File_Name	The name of the file
File_Extension	The file extension of the document
MD5Hash	The MD5 Hash Value of the document
Message_ID	The Message ID of the email and/or attachment
Mailstore	The name of the Mailstore in which the email and/or attachment is contained
File_Size	The size of the file
File_Path	Original file path of the document as it existed in the normal course of business or the folder location if the

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

	document/email is contained in a Mailstore
Number_Pages	The number of pages in the document

16. All DOCUMENTS attached to and/or embedded in an e-mail and/or other DOCUMENT must be produced contemporaneously and sequentially after the parent e-mail/document.

17. In producing DOCUMENTS, you shall furnish all DOCUMENTS in your possession, custody, or control. Without limitation of the term "control," a DOCUMENT is deemed to be in your control if you have the right to secure the DOCUMENT or a copy thereof from another person or public or private entity having actual possession thereof, or if you have the practical ability to obtain the DOCUMENT from a third-party, irrespective of any legal entitlement to the DOCUMENT. If any original DOCUMENT requested is not in your possession, custody, or control, then you are required to produce the best available copy, and to state, to the best of your knowledge, the name and address of the person in possession and/or control of the original. The fact that a DOCUMENT is in possession of another person or entity does not relieve you of the obligation to produce your copy of the DOCUMENT, even if the two DOCUMENTS are identical. In addition, any copy of a DOCUMENT shall be produced if it differs in any respect from the original (e.g., by reason of handwritten notes or comments having been added to copy which do not appear on the original or otherwise).

18. If responsive DOCUMENTS no longer exist because they have been destroyed, cannot be located, or are otherwise no longer in your possession or subject to your control, identify each DOCUMENT and describe the circumstances under which it was lost or destroyed.

19. All DOCUMENTS should be organized and labeled to correspond by number with the numbered categories set forth in these Requests. If a DOCUMENT is responsive to more than one Request, reference that DOCUMENT in your written response to each Request to which it is responsive or in a load file identifying the same.

///
///

1 **REQUEST NO. 3:**

2 All COMMUNICATIONS between YOU and MS. HEARD RELATING TO allegations
3 of physical abuse or domestic violence committed by either MR. DEPP or MS. HEARD.

4 **REQUEST NO. 4:**

5 All COMMUNICATIONS between YOU and MS. HEARD between March 7, 2013 and
6 March 15, 2013.

7 **REQUEST NO. 5:**

8 All COMMUNICATIONS between YOU and MS. HEARD between May 23, 2014 and
9 June 1, 2014.

10 **REQUEST NO. 6:**

11 All COMMUNICATIONS between YOU and MS. HEARD between August 16, 2014 and
12 August 24, 2014.

13 **REQUEST NO. 7:**

14 All COMMUNICATIONS between YOU and MS. HEARD between December 24, 2014
15 and January 1, 2015.

16 **REQUEST NO. 8:**

17 All COMMUNICATIONS between YOU and MS. HEARD between January 24, 2015 and
18 February 4, 2015.

19 **REQUEST NO. 9:**

20 All COMMUNICATIONS between YOU and MS. HEARD in March 2015.

21 **REQUEST NO. 10:**

22 All COMMUNICATIONS between YOU and MS. HEARD in August 2015.

23 **REQUFST NO. 11:**

24 All COMMUNICATIONS between YOU and MS. HEARD between November 25, 2015
25 and January 1, 2016

26 **REQUEST NO. 12:**

27 All COMMUNICATIONS between YOU and MS. HEARD between April 20, 2016 and
28 May 1, 2016.

1 **REQUEST NO. 13:**

2 All COMMUNICATIONS between YOU and MS. HEARD between May 20, 2016 and
3 June 15, 2016.

4 **REQUEST NO. 14:**

5 All COMMUNICATIONS between YOU and MS HEARD between June 15, 2016 and
6 the present relating to MR. DEPP

7 **REQUEST NO. 15:**

8 All COMMUNICATIONS between YOU and MS HEARD between June 15, 2016 and
9 the present relating to MS. HEARD'S relationship with MR. DEPP.

10 **REQUEST NO. 16:**

11 All COMMUNICATIONS between YOU and MS. HEARD between June 15, 2016 and
12 the present relating to the DIVORCE ACTION.

13 **REQUEST NO. 17:**

14 All COMMUNICATIONS between YOU and MS. HEARD between June 15, 2016 and
15 the present relating to MS. HEARD'S alleged donation of the proceeds from the DIVORCE
16 ACTION to the American Civil Liberties Union.

17 **REQUEST NO. 18:**

18 All COMMUNICATIONS between YOU and MS. HEARD between June 15, 2016 to the
19 present relating to MS. HEARD'S alleged donation of the proceeds from the DIVORCE ACTION
20 to Children's Hospital Los Angeles.

21 **REQUEST NO. 19:**

22 All COMMUNICATIONS between YOU and MS. HEARD between June 15, 2016 to the
23 present relating to the DIVORCE ACTION.

24 **REQUEST NO. 20:**

25 All COMMUNICATIONS between YOU and MS. HEARD between November 1, 2018 to
26 the present relating to the DEFAMATION ACTION.

27 ///

28 ///

1 REQUEST NO. 21:

2 All COMMUNICATIONS between YOU and MS. HEARD between November 1, 2018 to
3 the present relating to the DEFAMATION ACTION.

4 REQUEST NO. 22:

5 All COMMUNICATIONS between YOU and MS. HEARD relating to THE SUN CASE.
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

<p>ATTORNEY OR PARTY WITHOUT ATTORNEY (Name, State Bar number, and address) BROWN RUDNICK LLP CAMILLE M. VASQUEZ, #273377 2211 Michelson Drive, Seventh Floor Irvine, CA 92612 TELEPHONE NO (949) 752-7100 FAX NO (949) 252-1514 E-MAIL ADDRESS cvasquez@brownrudnick.com ATTORNEY FOR (Name) John C. Depp, II</p>	<p>FOR COURT USE ONLY</p>
<p>Court for county in which discovery is to be conducted SUPERIOR COURT OF CALIFORNIA, COUNTY OF LOS ANGELES STREET ADDRESS 111 N. Hill Street MAILING ADDRESS 111 N. Hill Street CITY AND ZIP CODE Los Angeles 90012 BRANCH NAME Stanley Mosk</p>	
<p>Court in which action is pending Name of Court Circuit Court of Fairfax County STREET ADDRESS 4110 Chain Bndge Road MAILING ADDRESS 4110 Chain Bridge Road, Suite 320 CITY, STATE, AND ZIP CODE Fairfax, Virginia 22030 COUNTRY United States</p>	
<p>PLAINTIFF/PETITIONER John C. Depp, II DEFENDANT/RESPONDENT Amber Laura Heard</p>	<p>CALIFORNIA CASE NUMBER (if any assigned by court)</p>
<p>DEPOSITION SUBPOENA FOR PERSONAL APPEARANCE AND PRODUCTION OF DOCUMENTS, ELECTRONICALLY STORED INFORMATION, AND THINGS IN ACTION PENDING OUTSIDE CALIFORNIA</p>	<p>CASE NUMBER (of action pending outside California) CL-2019-0002911</p>

THE PEOPLE OF THE STATE OF CALIFORNIA, TO (name, address, and telephone number of deponent, if known):
 Elon Musk, 10911 Chalon Road, Los Angeles, CA 90077

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

Date	September 23, 2020	Time	10.00 a m	Address	Brown Rudnick LLP, 2211 Michelson Drive, 7th Floor Irvine, CA 92612
------	--------------------	------	-----------	---------	--

- a. As a deponent who is not a natural person, you are ordered to designate one or more persons to testify on your behalf as to the matters described in item 4. (Code Civ. Proc., § 2025.230.)
 - b. You are ordered to produce the documents, electronically stored information, and things described in item 3.
 - c. This deposition will be recorded stenographically through the instant visual display of testimony and by audiotape videotape.
2. The personal attendance of the custodian or other qualified witness and the production of the original records are required by this subpoena. The procedure authorized by Evidence Code sections 1560(b), 1561, and 1562 will not be deemed sufficient compliance with this subpoena.
3. The documents, electronically stored information, and things to be produced and any testing or sampling being sought are described as follows ((if electronically stored information is required, the form or forms in which each type of information is to be produced may be specified) : See Attachment 3
- Continued on Attachment 3 (use form MC-025)
4. If the witness is a representative of a business or other entity, the matters upon which the witness is to be examined are described as follows:
- Continued on Attachment 4 (use form MC-025)
5. Attorneys for the parties to this action or parties without attorneys are (name, address, telephone number, and name of party represented). See Attachment 5
- Continued on Attachment 5 (use form MC-025)

PLAINTIFF/PETITIONER John C. Depp, II	CASE NUMBER
DEFENDANT/RESPONDENT Amber Laura Heard	CL-2019-0002911

6. Other terms or provisions from out-of-state subpoena, if any (specify):
See attached Fairfax County Circuit Court Subpoena

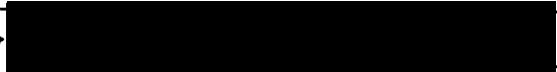
Continued on Attachment 6 (use form MC-025).

7. If you have been served with this subpoena as a custodian of consumer or employee records under Code of Civil Procedures section 1985.3 or 1985.6 and a motion to quash or an objection has been served on you, a court order or agreement of the parties, witnesses, and consumer or employee affected must be obtained before you are required to produce consumer or employee records.

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

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

Date issued August 13, 2020



(SIGNATURE OF PERSON ISSUING SUBPOENA)

CAMILLE M. VASQUEZ

Attorney for John C. Depp, II

(TYPE OR PRINT NAME)

(TITLE)

PROOF OF SERVICE OF DEPOSITION SUBPOENA FOR PERSONAL APPEARANCE AND PRODUCTION OF DOCUMENTS, ELECTRONICALLY STORED INFORMATION, AND THINGS

1. I served this Deposition Subpoena for Personal Appearance and Production of Documents, Electronically Stored Information, and Things in Action Pending Outside California by personally delivering a copy to the person served as follows.

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

c. Date of delivery:

d. Time of delivery

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

(1) were paid. Amount \$ _____

(2) were not paid.

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

f. Fee for service \$ _____

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

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

4. Person serving:

- a. Not a registered California process server
- b. California sheriff or marshal
- c. Registered California process server
- d. Employee or independent contractor of a registered California process server
- e. Exempt from registration under Business and Professions Code section 22350(b)

f. Name, address, telephone number, and, if applicable, county of registration and number:

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

Date:



(SIGNATURE)

(For California sheriff or marshal use only)

I certify that the foregoing is true and correct

Date:



(SIGNATURE)

1 ATTACHMENT 3

2 DEFINITIONS

3 1. "YOU" and/or "YOUR" shall mean and refer to Elon Musk.

4 2. "COMMUNICATION" and/or "COMMUNICATIONS" shall mean and refer to
5 any written and verbal exchanges between any person or persons or entities, including but not
6 limited to verbal conversations, telephone calls, letters, e-mails, memoranda, reports, telegraphs,
7 faxes, exhibits, drawings, text messages, and any other documents which confirm or relate to the
8 written or verbal exchange, including applicable ELECTRONICALLY STORED
9 INFORMATION.

10 3. "ELECTRONICALLY STORED INFORMATION" means data that is stored in an
11 electronic medium and shall include, by way of example only, computer programs, electronic mail
12 (including message contents, header information and logs of electronic mail usage), output
13 resulting from the use of any software program, including electronic, digital, or any other recorded
14 material whatsoever, including but not limited to, any notes, memoranda, videotapes, affidavits,
15 statements, papers, files, forms, data, tapes, printouts, letters, reports, communications, contracts,
16 agreements, telegrams, records, financial records, applications, correspondence, diaries, calendars,
17 recordings and transcriptions of recordings, voice mail messages recorded electronically and in
18 writing, email messages and printouts, photographs, diagrams, or any other writings, however
19 produced or reproduced, word processing documents, spreadsheets, databases, telephone logs,
20 contact manager information, Internet usage files, PDF files, .JPG files, .TIF files, .TXT files,
21 batch files, ASCII files, and any and all miscellaneous files and data and shall include all active
22 data, deleted data, file fragments, metadata, native file formats and forensic images thereof.

23 4. "DEFAMATION ACTION" shall mean and refer to the action entitled *John C.*
24 *Depp II v. Amber Laura Heard*, Circuit Court of Fairfax County Virginia Civil Action No. CL-
25 2019-0002911.

26 5. "DIVORCE ACTION" shall mean and refer to the action entitled *In re the*
27 *Marriage of Amber Laura Depp and John Christopher Depp II*, Los Angeles Superior Court Case
28 No. BD641052.

1 12. All undefined terms shall be interpreted according to their plain and commonsense
2 meaning.

3 13. DOCUMENTS should be produced as single page .tiff format files imaged at 300
4 dpi, with the exception of stand-alone Databases (e.g., Access), spreadsheets (e.g , Excel), slide
5 presentations (e.g , PowerPoint), video files, and audio files, which should be produced in native
6 format Each .tiff file should have a unique name matching the Bates number labeled on the
7 corresponding page. Color DOCUMENTS should be produced in color.

8 14. DOCUMENTS should be produced with (a) a delimited data file (.dat), and (b) an
9 image load file (.opt and/or .lfp). Each .tiff in a production must be referenced in the
10 corresponding image load file. The total number of documents referenced in a production's data
11 load file should match the total number of designated document breaks in the image load file for
12 the production.

13 15. DOCUMENTS should be produced with extracted metadata for each DOCUMENT
14 in the form of a .dat file. The metadata should include the following fields, to the extent such
15 fields are available in the original DOCUMENT as it originally existed in its native format:

Field	Description
Bates_Begin	The bates label of the first page of the document
Bates_End	The bates label of the last page of the document
Attach_Begin	The bates label of the first page of a family of documents (e.g., email and attachment)
Attach_End	The bates label of the last page of a family of documents
Sent_Date	For email, the sent date of the message
Sent_Time	For email, the sent time of the message converted to GMT
Email_Author	The sender of an email message (email FROM)
Recipient	The recipients of an email message (email TO)

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

CC	The recipients of a copy of an email message (email CC)
BCC	The recipients of a blind copy of an email message (email BCC)
Custodian	The custodian in whose file the document was found, including all duplicate custodians
Datercvd	Date received
Datesent	Date sent
Subject	E-mail subject
Author	The person who created the document
Modifier	The person who last modified the document
Created	The creation date of the document
Last_Modified	The last modified date of the document
Title	The title of the document
File_Name	The name of the file
File_Extension	The file extension of the document
MD5Hash	The MD5 Hash Value of the document
Message_ID	The Message ID of the email and/or attachment
Mailstore	The name of the Mailstore in which the email and/or attachment is contained
File_Size	The size of the file
File_Path	Original file path of the document as it existed in the normal course of business or the folder location if the

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

	document/email is contained in a Mailstore
Number_Pages	The number of pages in the document

16 All DOCUMENTS attached to and/or embedded in an e-mail and/or other DOCUMENT must be produced contemporaneously and sequentially after the parent e-mail/document.

17. In producing DOCUMENTS, you shall furnish all DOCUMENTS in your possession, custody, or control. Without limitation of the term "control," a DOCUMENT is deemed to be in your control if you have the right to secure the DOCUMENT or a copy thereof from another person or public or private entity having actual possession thereof, or if you have the practical ability to obtain the DOCUMENT from a third-party, irrespective of any legal entitlement to the DOCUMENT. If any original DOCUMENT requested is not in your possession, custody, or control, then you are required to produce the best available copy, and to state, to the best of your knowledge, the name and address of the person in possession and/or control of the original. The fact that a DOCUMENT is in possession of another person or entity does not relieve you of the obligation to produce your copy of the DOCUMENT, even if the two DOCUMENTS are identical. In addition, any copy of a DOCUMENT shall be produced if it differs in any respect from the original (e g , by reason of handwritten notes or comments having been added to copy which do not appear on the original or otherwise).

18. If responsive DOCUMENTS no longer exist because they have been destroyed, cannot be located, or are otherwise no longer in your possession or subject to your control, identify each DOCUMENT and describe the circumstances under which it was lost or destroyed.

19. All DOCUMENTS should be organized and labeled to correspond by number with the numbered categories set forth in these Requests. If a DOCUMENT is responsive to more than one Request, reference that DOCUMENT in your written response to each Request to which it is responsive or in a load file identifying the same.

///
///

1 20. A Request for a DOCUMENT shall be deemed to include a request for any and all
2 file folders within which the DOCUMENT was contained, transmittal sheets, cover letters,
3 exhibits, enclosures, or attachments to the DOCUMENT in addition to the DOCUMENT itself.

4 21. If you claim that any DOCUMENT is, in whole or in part, beyond the scope of
5 permissible discovery (including but not limited to any claim of privilege or confidentiality),
6 specify in detail each and every ground on which such claim rests and identify generally what the
7 document is. If you assert any claim of privilege, then at the time of production you are to furnish
8 a privilege log that specifically identifies each DOCUMENT (or portion) withheld by (a) date, (b)
9 author, (c) recipient, (d) persons copied, (e) general description of the subject matter of the
10 DOCUMENT, and (f) a statement of the specific privilege claimed and the basis upon which such
11 privilege is claimed as to each separate DOCUMENT (or portion) withheld. The privilege log
12 should contain enough specificity, but without disclosing privileged information, to allow
13 Plaintiffs and the Court to adequately assess the privilege claimed.

14 22. To the extent you consider any portion of the following Requests to be
15 objectionable, (a) identify the portion of the Request claimed to be objectionable, (b) state the
16 nature and basis of the objection, and (c) produce DOCUMENTS responsive to any portion of
17 such Request that is not claimed to be objectionable.

18 23. If you believe that any Request is unclear, unintelligible, or because of its wording
19 otherwise prevents you from responding fully to that Request, identify the ambiguity or source of
20 confusion and explain the definition and understanding that you relied upon in responding. It shall
21 be insufficient to object to a particular Request on the grounds that it is vague, ambiguous, or
22 otherwise unclear, and withhold DOCUMENTS on that basis without seeking clarification.

DOCUMENT REQUESTS

REQUEST NO. 1:

25 All DOCUMENTS or COMMUNICATIONS YOU reviewed and/or relied upon in
26 preparation for YOUR deposition.

REQUEST NO. 2:

28 All COMMUNICATIONS between YOU and MS. HEARD RELATING TO MR. DEPP.

1 **REQUEST NO. 3:**

2 All COMMUNICATIONS between YOU and MS. HEARD RELATING TO allegations
3 of physical abuse or domestic violence committed by either MR. DEPP or MS. HEARD.

4 **REQUEST NO. 4:**

5 All COMMUNICATIONS between YOU and MS. HEARD between March 7, 2013 and
6 March 15, 2013.

7 **REQUEST NO. 5:**

8 All COMMUNICATIONS between YOU and MS. HEARD between May 23, 2014 and
9 June 1, 2014.

10 **REQUEST NO. 6:**

11 All COMMUNICATIONS between YOU and MS. HEARD between August 16, 2014 and
12 August 24, 2014.

13 **REQUEST NO. 7:**

14 All COMMUNICATIONS between YOU and MS. HEARD between December 24, 2014
15 and January 1, 2015.

16 **REQUEST NO. 8:**

17 All COMMUNICATIONS between YOU and MS. HEARD between January 24, 2015 and
18 February 4, 2015.

19 **REQUEST NO. 9:**

20 All COMMUNICATIONS between YOU and MS. HEARD in March 2015.

21 **REQUEST NO. 10:**

22 All COMMUNICATIONS between YOU and MS. HEARD in August 2015.

23 **REQUEST NO. 11:**

24 All COMMUNICATIONS between YOU and MS HEARD between November 25, 2015
25 and January 1, 2016.

26 **REQUEST NO. 12:**

27 All COMMUNICATIONS between YOU and MS. HEARD between April 20, 2016 and
28 May 1, 2016.

1 REQUEST NO. 13:

2 All COMMUNICATIONS between YOU and MS. HEARD between May 20, 2016 and
3 June 15, 2016.

4 REQUEST NO. 14:

5 All COMMUNICATIONS between YOU and MS. HEARD between June 15, 2016 and
6 the present relating to MR. DEPP.

7 REQUEST NO. 15:

8 All COMMUNICATIONS between YOU and MS. HEARD between June 15, 2016 and
9 the present relating to MS. HEARD'S relationship with MR. DEPP.

10 REQUEST NO. 16:

11 All COMMUNICATIONS between YOU and MS. HEARD between June 15, 2016 and
12 the present relating to the DIVORCE ACTION.

13 REQUEST NO. 17:

14 All COMMUNICATIONS between YOU and MS. HEARD between June 15, 2016 and
15 the present relating to MS. HEARD'S alleged donation of the proceeds from the DIVORCE
16 ACTION to the American Civil Liberties Union.

17 REQUEST NO. 18:

18 All COMMUNICATIONS between YOU and MS. HEARD between June 15, 2016 to the
19 present relating to MS. HEARD'S alleged donation of the proceeds from the DIVORCE ACTION
20 to Children's Hospital Los Angeles.

21 REQUEST NO. 19:

22 All COMMUNICATIONS between YOU and MS. HEARD between June 15, 2016 to the
23 present relating to the DIVORCE ACTION.

24 REQUEST NO. 20:

25 All COMMUNICATIONS between YOU and MS. HEARD between November 1, 2018 to
26 the present relating to the DEFAMATION ACTION.

27 ///

28 ///

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

REQUEST NO. 21:

All COMMUNICATIONS between YOU and MS. HEARD between November 1, 2018 to the present relating to the DEFAMATION ACTION.

REQUEST NO. 22:

All COMMUNICATIONS between YOU and MS. HEARD relating to THE SUN CASE.

SHORT TITLE John C. Depp, II v. Amber Laura Heard	CASE NUMBER CL-2019-0002911
--	--------------------------------

ATTACHMENT (Number) 5

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

Benjamin G. Chew (VSB No. 29113)
 Andrew C. Crawford (VSB No. 89093)
 BROWN RUDNICK LLP
 601 Thirteenth Street, N.W.
 Washington, DC 20005
 Telephone: (202) 536-1700
 Facsimile: (202) 536-1701
 bchew@brownrudnick.com
 acrawford@brownrudnick.com

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

Adam R. Waldman (*pro hac vice*)
 THE ENDEAVOR LAW FIRM, P.C.
 1775 Pennsylvania Avenue, N.W.
 Washington, DC 20006
 Telephone: (202) 715-0966
 Facsimile: (202) 715-0964
 awaldman@theendeavorgroup.com

Counsel for Plaintiff John C. Depp, II

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

Elaine Charlson Bredehoft (VSB No. 23766)
 Carla D. Brown (VSB No. 44803)
 Adam S. Nadclhaft (VSB No. 91717)
 David E. Murphy (VSB No. 90938)
 Charlson Bredehoft Cohen & Brown, P.C.
 11260 Roger Bacon Drive, Suite 201
 Reston, VA 20190
 Telephone: (703) 318-6800
 Facsimile: (703) 318-6808
 ebredehoft@cbcblaw.com
 cbrown@cbcblaw.com
 anadelhaft@cbcblaw.com
 dmurphy@cbcblaw.com

Counsel for Defendant Amber Laura Heard

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

Page 1 of 1

(Add pages as required)

ATTACHMENT 4

Elaine Bredehoft

From: Elaine Bredehoft
Sent: Wednesday, August 19, 2020 3:35 PM
To: Chew, Benjamin G
Cc: Vasquez, Camille M; Crawford, Andrew C.; brottenborn@woodsrogers.com, Joshua Treece; Adam Nadelhaft; David Murphy, Leslie Hoff, Michelle Bredehoft
Subject: RE: Request for Meet and Confer re 1) Consent Order respecting Rule 3 25(D) Attorneys' fees and costs award, and 2) Mr. Depp's Forthcoming Motion to Continue the Current Trial Date

TimeMattersID: MABF4AC442D41941
TM Contact: Heard, Amber
TM Matter No: 20-5294
TM Matter Reference: Heard, Amber

Ben: Yes, I think it may be helpful for us to have a conversation to discuss the fee issue. We also need to talk about the 7th RFPs, and I would like to discuss some other issues that are coming up in the California subpoenas to see if we can resolve them.

On your request for a continuance of the trial, what is the filming schedule for Mr. Depp and when did he learn of this? Also, what is it that you think requires more time based on the Counterclaims?

I am fine with your taking the September 11 Friday hearing date. We would like to schedule our motions for the 18th and 25th. Since no one needs to file their motions this Friday and my Thursday is pretty tight, may I suggest we have the meet and confer Friday after our motions? Alternatively, if you are not available, how about Monday – I can be available Monday afternoon.

Let me know on the questions above and your availability Friday and Monday.

Elaine

Elaine Charlson Bredehoft
Charlson Bredehoft Cohen & Brown, P.C.
11260 Roger Bacon Drive
Suite 201
Reston, VA 20190
(703) 318-6800
(703) 919-2735 (mobile)
(703) 318-6808 (fax)
www.cbcblaw.com

From: Chew, Benjamin G. <BChew@brownrudnick.com>
Sent: Wednesday, August 19, 2020 12:52 PM
To: Elaine Bredehoft <ebredehoft@charlsonbredehoft.com>
Cc: Vasquez, Camille M. <CVasquez@brownrudnick.com>; Crawford, Andrew C. <ACrawford@brownrudnick.com>; brottenborn@woodsrogers.com; Joshua Treece <jtreece@woodsrogers.com>; Adam Nadelhaft <anadelhaft@cbcblaw.com>; David Murphy <DMurphy@cbcblaw.com>; Leslie Hoff <lhoff@charlsonbredehoft.com>, Michelle Bredehoft <mbredehoft@charlsonbredehoft.com>
Subject: Request for Meet and Confer re 1) Consent Order respecting Rule 3:25(D) Attorneys' fees and costs award; and 2) Mr. Depp's Forthcoming Motion to Continue the Current Trial Date

Dear Elaine:

I confess to being unfamiliar with this procedure and request that we have a meet and confer on this tomorrow at your convenience.

At the same time I would like to discuss whether Ms. Heard would agree to Mr. Depp's forthcoming motion to continue the existing trial date based on, inter alia, the conflict with the shooting of Fantastic Beasts 3 and the \$ 100 million Counterclaims you filed just last week (August 10). We plan to file the motion this Friday and set it for hearing on Friday, September 11.

I look forward to discussing these matters with you tomorrow.

Best regards,

Ben

Sent from my iPhone

On Aug 17, 2020, at 6 26 PM, Elaine Bredehoft <ebredehoft@charlsonbredehoft.com> wrote:

External E-mail. Use caution accessing links or attachments

Ben: May I have a response to this please? Thank you. Elaine

Elaine Charlson Bredehoft
Charlson Bredehoft Cohen & Brown, P.C.
11260 Roger Bacon Drive
Suite 201
Reston, VA 20190
(703) 318-6800
(703) 919-2735 (mobile)
(703) 318-6808 (fax)
www.cbcblaw.com<<http://www.cbcblaw.com>>

From: Elaine Bredehoft
Sent: Thursday, August 13, 2020 4 29 PM
To: bchew@brownrudnick.com; Vasquez, Camille M. <CVasquez@brownrudnick.com>; Crawford, Andrew C. <ACrawford@brownrudnick.com>

Cc: brottenborn@woodsrogers.com; Joshua Treece <jtreece@woodsrogers.com>; Adam Nadelhaft <anadelhaft@cbcblaw.com>; David Murphy <DMurphy@cbcblaw.com>; Leslie Hoff <lhoff@charlsonbredehoft.com>, Michelle Bredehoft <mbredehoft@charlsonbredehoft.com>
Subject: Consent Order respecting Rule 3.25(D) Attorneys' fees and costs award

Ben, Camille and Andrew: Attached for your review is a Consent Order respecting the treatment of attorneys' fees and costs by the Court in the event Ms. Heard prevails, and the Court determines an award of fees and costs are reasonable. Under Rule 3.25(D), any party may request this, or the Court may sua sponte order it. As you know, Ms. Heard has pleaded the Anti Slapp provision, and under the statute, if she prevails and the Court determines it qualifies under the First Amendment, she would be entitled to fees and costs.

Please review and let me know if you have any suggested edits and agree. If you are unwilling to enter into a Consent Order, please also let me know, so we can file the appropriate motion and schedule this before the Court. I hope that will not be necessary, as this is the preferred practice and one the Court suggests we resolve early on.

Please feel free to give me a call to discuss. I look forward to hearing from you. Elaine

Elaine Charlson Bredehoft
Charlson Bredehoft Cohen & Brown, P.C.
11260 Roger Bacon Drive
Suite 201
Reston, VA 20190
(703) 318-6800
(703) 919-2735 (mobile)
(703) 318-6808 (fax)
www.cbcblaw.com<<http://www.cbcblaw.com>>

The information contained in this electronic message may be legally privileged and confidential under applicable law, and is intended only for the use of the individual or entity named above. If the recipient of this message is not the above-named intended recipient, you are hereby notified that any dissemination, copy or disclosure of this communication is strictly prohibited. If you have received this communication in error, please notify Brown Rudnick LLP, (617) 856-8200 (if dialing from outside the US, 001-(617)-856-8200) and purge the communication immediately without making any copy or distribution.

To the extent Brown Rudnick is a "data controller" of the "personal data" (as each term is defined in the European General Data Protection Regulation) you have provided to us in this and other communications between us, please see our privacy statement and summary [here](#) which sets out details of the data controller, the personal data we have collected, the purposes for which we use it (including any legitimate interests on which we rely), the persons to whom we may transfer the data and how we intend to transfer it outside the European Economic Area.

Elaine Bredehoft

From: Elaine Bredehoft
Sent: Thursday, August 20, 2020 9:37 AM
To: Chew, Benjamin G
Cc: Vasquez, Camille M, Crawford, Andrew C ; brottenborn@woodsrogers.com, Joshua Treece; Adam Nadelhaft, David Murphy, Leslie Hoff, Michelle Bredehoft
Subject: RE: Request for Meet and Confer re 1) Consent Order respecting Rule 3.25(D) Attorneys' fees and costs award, and 2) Mr. Depp's Forthcoming Motion to Continue the Current Trial Date

TimeMattersID: M87EFAC44F853293
TM Contact: Heard, Amber
TM Matter No: 20-5294
TM Matter Reference: Heard, Amber

Ben: Happy Birthday early!

Please forward to me all communications between Warner Brothers and Mr. Depp, or anyone on his behalf, relating to restarting and scheduling of the filming of *Fantastic Beasts 3*, and specifically Mr. Depp's filming schedule, and any efforts Mr. Depp made to work around his scheduled deposition and the trial. This will assist us on our end in fully reviewing and evaluating the situation.

Your supplemental interrogatory responses are due tomorrow which we have been eagerly awaiting to obtain more information for those you believe have knowledge in this case. This will assist us in determining the number of depositions we still need to take, in addition to those we have scheduled for September and October.

Once we have all of the above information, let's schedule a call to discuss. Elaine

Elaine Charlson Bredehoft
Charlson Bredehoft Cohen & Brown, P.C.
11260 Roger Bacon Drive
Suite 201
Reston, VA 20190
(703) 318-6800
(703) 919-2735 (mobile)
(703) 318-6808 (fax)
www.cbcblaw.com

From: Chew, Benjamin G. <BChew@brownrudnick.com>
Sent: Wednesday, August 19, 2020 6:29 PM

To: Elaine Bredehoft <ebredehoft@charlsonbredehoft.com>

Cc: Vasquez, Camille M <CVasquez@brownrudnick.com>; Crawford, Andrew C <ACrawford@brownrudnick.com>; brottenborn@woodsrogers.com, Joshua Treece <jtreece@woodsrogers.com>; Adam Nadelhaft <anadelhaft@cbcblaw.com>, David Murphy <DMurphy@cbcblaw.com>; Leslie Hoff <lhoff@charlsonbredehoft.com>, Michelle Bredehoft <mbredehoft@charlsonbredehoft.com>

Subject: Request for Meet and Confer re 1) Consent Order respecting Rule 3 25(D) Attorneys' fees and costs award, and 2) Mr. Depp's Forthcoming Motion to Continue the Current Trial Date

Good evening, Elaine,

Thanks for your message and for agreeing to leave open September 11 for the hearing on Mr. Depp's forthcoming motion for continuance (That is three days after my birthday in case anyone is in a giving mood ☺)

Mr. White was informed today by Warner Bros. that shooting of *Fantastic Beasts 3* will commence in early October 2020 and run through the middle of February 2021. Accordingly, Mr. Depp plans to seek a continuance of the trial date to sometime between March and June 2021. Obviously we are willing to discuss your scheduling preferences if your client is amenable to what would be a relatively brief continuance from January 11.

On another subject, approximately how depositions does Ms. Heard plan to notice (understanding that your estimate is subject to change)?

Please let me know what time tomorrow would be most convenient to discuss this and the other issues you raised below.

Best regards,

Ben

brownrudnick

Benjamin G. Chew
Partner

Brown Rudnick LLP
601 Thirteenth Street NW Suite 600
Washington, DC 20005
T 202-536-1785
F 617-289-0717
bchew@brownrudnick.com
www.brownrudnick.com

Please consider the environment before printing this e-mail.

From: Elaine Bredehoft [mailto:ebredehoft@charlsonbredehoft.com]

Sent: Wednesday, August 19, 2020 3:35 PM

To: Chew, Benjamin G.

Cc: Vasquez, Camille M.; Crawford, Andrew C.; brottenborn@woodsrogers.com; Joshua Treece; Adam Nadelhaft; David Murphy; Leslie Hoff; Michelle Bredehoft
Subject: RE: Request for Meet and Confer re 1) Consent Order respecting Rule 3:25(D) Attorneys' fees and costs award; and 2) Mr. Depp's Forthcoming Motion to Continue the Current Trial Date

External E-mail. Use caution accessing links or attachments

Ben: Yes, I think it may be helpful for us to have a conversation to discuss the fee issue. We also need to talk about the 7th RFPs, and I would like to discuss some other issues that are coming up in the California subpoenas to see if we can resolve them.

On your request for a continuance of the trial, what is the filming schedule for Mr. Depp and when did he learn of this? Also, what is it that you think requires more time based on the Counterclaims?

I am fine with your taking the September 11 Friday hearing date. We would like to schedule our motions for the 18th and 25th. Since no one needs to file their motions this Friday and my Thursday is pretty tight, may I suggest we have the meet and confer Friday after our motions? Alternatively, if you are not available, how about Monday – I can be available Monday afternoon.

Let me know on the questions above and your availability Friday and Monday.

Elaine

Elaine Charlson Bredehoft
Charlson Bredehoft Cohen & Brown, P.C.
11260 Roger Bacon Drive
Suite 201
Reston, VA 20190
(703) 318-6800
(703) 919-2735 (mobile)
(703) 318-6808 (fax)
www.cbcblaw.com

From: Chew, Benjamin G. <BChew@brownrudnick.com>
Sent: Wednesday, August 19, 2020 12:52 PM
To: Elaine Bredehoft <ebredehoft@charlsonbredehoft.com>
Cc: Vasquez, Camille M. <CVasquez@brownrudnick.com>, Crawford, Andrew C <ACrawford@brownrudnick.com>, brottenborn@woodsrogers.com; Joshua Treece <jtreece@woodsrogers.com>; Adam Nadelhaft <anadelhaft@cbcblaw.com>, David Murphy <DMurphy@cbcblaw.com>, Leslie Hoff <lhoff@charlsonbredehoft.com>, Michelle Bredehoft <mubredehoft@charlsonbredehoft.com>
Subject: Request for Meet and Confer re 1) Consent Order respecting Rule 3 25(D) Attorneys' fees and costs award; and 2) Mr. Depp's Forthcoming Motion to Continue the Current Trial Date

Dear Elaine:

I confess to being unfamiliar with this procedure and request that we have a meet and confer on this tomorrow at your convenience

At the same time I would like to discuss whether Ms. Heard would agree to Mr. Depp's forthcoming motion to continue the existing trial date based on, inter alia, the conflict with the shooting of Fantastic Beasts 3 and the \$ 100 million Counterclaims you filed just last week (August 10) We plan to file the motion this Friday and set it for hearing on Friday, September 11

I look forward to discussing these matters with you tomorrow.

Best regards,

Ben

Sent from my iPhone

On Aug 17, 2020, at 6:26 PM, Elaine Bredehoft <ebredehoft@charlsonbredehoft.com> wrote.

External E-mail Use caution accessing links or attachments

Ben May I have a response to this please? Thank you Elaine

Elaine Charlson Bredehoft
Charlson Bredehoft Cohen & Brown, P C.
11260 Roger Bacon Drive
Suite 201
Reston, VA 20190
(703) 318-6800
(703) 919-2735 (mobile)
(703) 318-6808 (fax)
www.cbcbllaw.com<<http://www.cbcbllaw.com>>

From: Elaine Bredehoft
Sent: Thursday, August 13, 2020 4:29 PM
To: bchew@brownrudnick.com; Vasquez, Camille M. <CVasquez@brownrudnick.com>, Crawford, Andrew C. <ACrawford@brownrudnick.com>
Cc: brottenborn@woodsrogers.com, Joshua Treece <jtreece@woodsrogers.com>; Adam Nadelhaft <anadelhaft@cbcbllaw.com>; David Murphy <DMurphy@cbcbllaw.com>, Leslie Hoff <lhoff@charlsonbredehoft.com>, Michelle Bredehoft <mbredehoft@charlsonbredehoft.com>
Subject: Consent Order respecting Rule 3 25(D) Attorneys' fees and costs award

Ben, Camille and Andrew: Attached for your review is a Consent Order respecting the treatment of attorneys' fees and costs by the Court in the event Ms. Heard prevails, and the Court determines an award of fees and costs are reasonable Under Rule 3-25(D), any party may request this, or the Court may sua sponte order it As you know, Ms. Heard has pleaded the Anti Slapp provision, and under the statute, if she prevails and the Court determines it qualifies under the First Amendment, she would be entitled to fees and costs

Please review and let me know if you have any suggested edits and agree If you are unwilling to enter into a

Consent Order, please also let me know, so we can file the appropriate motion and schedule this before the Court I hope that will not be necessary, as this is the preferred practice and one the Court suggests we resolve early on

Please feel free to give me a call to discuss I look forward to hearing from you Elaine

Elaine Charlson Bredehoff
Charlson Bredehoff Cohen & Brown, P.C.
11260 Roger Bacon Drive
Suite 201
Reston, VA 20190
(703) 318-6800
(703) 919-2735 (mobile)
(703) 318-6808 (fax)
www.cbcbllaw.com<<http://www.cbcbllaw.com>>

.....

The information contained in this electronic message may be legally privileged and confidential under applicable law, and is intended only for the use of the individual or entity named above. If the recipient of this message is not the above-named intended recipient, you are hereby notified that any dissemination, copy or disclosure of this communication is strictly prohibited. If you have received this communication in error, please notify Brown Rudnick LLP, (617) 856-8200 (if dialing from outside the US, 001-(617)-856-8200) and purge the communication immediately without making any copy or distribution.

To the extent Brown Rudnick is a "data controller" of the "personal data" (as each term is defined in the European General Data Protection Regulation) you have provided to us in this and other communications between us, please see our privacy statement and summary [here](#) which sets out details of the data controller, the personal data we have collected, the purposes for which we use it (including any legitimate interests on which we rely), the persons to whom we may transfer the data and how we intend to transfer it outside the European Economic Area

.....

.....

The information contained in this electronic message may be legally privileged and confidential under applicable law, and is intended only for the use of the individual or entity named above. If the recipient of this message is not the above-named intended recipient, you are hereby notified that any dissemination, copy or disclosure of this communication is strictly prohibited. If you have received this communication in error, please notify Brown Rudnick LLP, (617) 856-8200 (if dialing from outside the US, 001-(617)-856-8200) and purge the communication immediately without making any copy or distribution.

To the extent Brown Rudnick is a "data controller" of the "personal data" (as each term is defined in the European General Data Protection Regulation) you have provided to us in this and other communications between us, please see our privacy statement and summary [here](#) which sets out details of the data controller, the personal data we have collected, the purposes for which we use it (including any legitimate interests on which we rely) the persons to whom we may transfer the data and how we intend to transfer it outside the European Economic Area

.....

ATTACHMENT 6

Elaine Bredehoft

From: Elaine Bredehoft
Sent: Monday, August 24, 2020 9:41 AM
To: glenn.eckerle@warnerbros.com
Subject: Depp v. Heard litigation and Filming of the Fantastic Beasts 3
Attachments: Ltr from Glenn Eckerle 8-19-20.pdf, Notice of Dep Depp 8-7-20.pdf, Calendar Control Scheduling Order 5-18-20 re new Trial date.pdf

TimeMattersID: M73D8AC46E7AC149
TM Contact: Heard, Amber
TM Matter No: 20-5294
TM Matter Reference: Heard, Amber

Mr. Eckerle:

I represent Amber Heard. I have been provided a copy of your letter to Mr. Edward White dated August 19, 2020, a copy of which I am attaching.

As you are surely aware, Mr. Depp filed suit against Amber Heard in Virginia in March 2018 and the trial date was set for February 3, 2020. That trial date was then continued -- on May 18, 2020, the Court set the new trial date beginning January 11, 2021. The good faith estimate of the parties is the trial, by jury, will last three weeks. I am attaching the Court's May 18, 2020 Scheduling Order setting the January trial date. Please note that Mr. Depp's counsel was present by telephone for the setting of the trial date and agreed with those dates for trial.

In preparation for trial, Mr. Depp's Deposition was properly noticed for October 5-9, 2020 in Virginia, where he brought the lawsuit. A copy of the Notice of Deposition of Mr. Depp, dated August 7, 2020, is attached for your ready reference.

I am sure you appreciate that these are serious legal obligations, to which Mr. Depp has agreed to adhere in filing and pursuing his lawsuit in our jurisdiction.

As we are all aware, studios attempt to work with their actors on scheduling filming. I am assuming Mr. Depp and his representatives have provided these documents (Notice of Deposition and Scheduling Order setting the January trial date) to you and brought to your attention that these may potentially conflict with the filming schedule. I would appreciate your confirming that Warner Bros. Pictures will be flexible with Mr. Depp's filming schedule to ensure he meets his legal obligations in Virginia and is able to attend his Deposition from October 5-9, 2020 and he will be available for trial during the period January 11-29, 2021.

Toward that end, I would appreciate your providing me with a copy of the current Shooting Schedule and Mr. Depp's Day Out of Days (DOOD). If for any reason the deposition or trial dates conflict with actual filming of Mr. Depp's parts, please let me know if you are able to reschedule to accommodate Mr. Depp's legal obligations. As I am sure you can appreciate, we are highly motivated for this trial to take place as quickly as possible.

Please feel free to contact me by telephone if you would like to discuss this further or need additional information. I greatly appreciate your assistance in navigating these apparently now competing schedules so that we may both achieve our desired goals.

Thank you for your cooperation and consideration.

Elaine

Elaine Charlson Bredehoft
Charlson Bredehoft Cohen & Brown, P.C.
11260 Roger Bacon Drive
Suite 201
Reston, VA 20190
(703) 318-6800
(703) 919-2735 (mobile)
(703) 318-6808 (fax)
www.cbcblaw.com



Glenn A. Eckerle
Senior Vice President, Legal Affairs

August 19, 2020

Edward White
Edward White & Co., LLP
Certified Public Accountants
Warner Center Towers
21700 Oxnard Street, Suite 400
Woodland Hills, California 91367

BY EMAIL

Re: "FANTASTIC BEASTS 3" / Johnny Depp / Actor

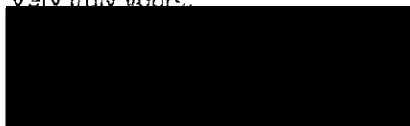
Dear Edward:

The theatrical motion picture presently entitled "Fantastic Beasts 3" (the "Picture") is being produced by Number Three Films Limited ("Company") for distribution by Warner Bros. Pictures.

Pursuant to the Agreements between Company and LRD Productions, Inc. ("Lender") f/s/o Johnny Depp ("Artist"), Artist is currently scheduled to render services on the Picture in London on an exclusive basis commencing in early October, 2020 and running through and including the middle of February, 2021.

Of course, as is normal for film production, these dates are subject to production exigencies and further scheduling changes, and Company may require Artist's services on the Picture for additional period of time (before and after such time periods) in order for Artist to complete his required services on the Picture.

Very truly yours,



Glenn A. Eckerle

cc Lawrence Leavitt (all by email)
Bryan Lourd
Sheldon Sro'off
Jodi Levinson
Nigel McCorry

VIRGINIA:

IN THE CIRCUIT COURT OF FAIRFAX COUNTY

JOHN C. DEPP, II.

Plaintiff,

v.

AMBER LAURA HEARD,

Defendant

Civil Action No.: CL-2019-0002911

NOTICE OF DEPOSITION BY VIDEO

PLEASE TAKE NOTICE that the Defendant, Amber Laura Heard, by counsel, will take the videotaped deposition upon oral examination of JOHN C DEPP, II beginning at 9.30 a.m on October 5, and each day at 9-30 a.m. through October 9, 2020. to be continued further if necessary and not completed. The deposition will be held at the offices of Charlson Bredehoft Cohen & Brown, P C , 11260 Roger Bacon Drive, Suite 201, Reston, Virginia 20190. The deposition will be taken before an officer authorized by law to administer oaths and take testimony and will be transcribed by a certified Court Reporter and videographer. The deposition will continue until concluded, and will be used for all lawful purposes

Dated this 7th day of August 2020

Respectfully submitted.

Amber L. Heard



Elaine Charlson Bredehoft (VSB No. 23766)
Carla D. Brown (VSB 44903)
Adam S. Nadelhaft (VSB No. 91717)
David E. Murphy (VSB No. 90938)
Charlson Bredehoft Cohen & Brown, P.C.
11260 Roger Bacon Drive, Suite 201
Reston, Virginia 20190
Telephone: (703) 318-6800
Facsimile: (703) 318-6808
ebredchoft@cbcblaw.com
cbrown@cbcblaw.com
anadelhaft@cbcblaw.com
dmurphy@cbcblaw.com

J. Benjamin Rottenborn, Esq.
Joshua R. Treece, Esq.
Woods Rogers PLC
10 S. Jefferson Street, Suite 1400
P.O. Box 14125
Roanoke, Virginia 24011
brottenborn@woodsrogers.com
jtreece@woodsrogers.com

Counsel to Defendant Amber Laura Heard

CERTIFICATE OF SERVICE

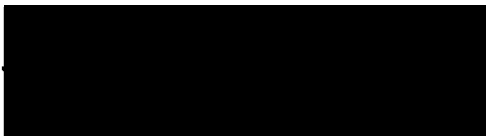
I certify that on this 7th day of August 2020, a copy of the foregoing shall be served by email, pursuant to agreement and Court Order, as follows

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



Elaine Charlson Bredehoff (VSB No. 23766)
Carla D Brown (VSB 44873)
Adam S Nadelhaft (VSB No. 91717)
David E Murphy (VSB No. 90938)
Charlson Bredehoff Cohen & Brown, P.C.
11260 Roger Bacon Drive, Suite 201
Reston, Virginia 20190
Telephone: (703) 318-6800
Facsimile: (703) 318-6808
ebredehoff@chcblaw.com
cbrown@chcblaw.com
anadelhaft@chcblaw.com
dmurphy@chcblaw.com



CIRCUIT COURT OF FAIRFAX COUNTY
CALENDAR CONTROL ORDER

PART ONE - TO BE COMPLETED BY THE PARTIES

Case number(s): CL 2019-2911

JOHN DEPP, III v. AMBER HEARD

Benjamin Chew Benjamin Potteboorn

Counsel for Plaintiff Pro Se Counsel for Defendant Pro Se

Signature By telephone VSB No. Signature By telephone VSB No.

Email Address / Telephone Number Email Address / Telephone Number

Action Requested by: Plaintiff Defendant

Notice of Calendar Control Appearance provided to opposing party on _____ (date) by _____ (method). Attach copy of notice if opposing party is not present.

Action Requested: COVID + LA COURTS CLOSING

Has a substantially similar request previously been made? No Yes, on _____
How did the Court rule on the previous request? _____

PART TWO - TO BE COMPLETED BY THE CALENDAR CONTROL JUDGE

The action requested is DENIED GRANTED, as follows _____

The hearing presently set for _____ (date) is removed from the docket.
8/3/20 11/11/2021 12 days of
Existing Date New Hearing Date Hearing Time Judge Assigned Hearing Length
trial

Jury Trial? No Yes, by request of Plaintiff Defendant

Two-week motion One-week motion with a judge without a judge

Long briefs approved: No Yes (attach Long Brief Form)

Is a necessary party incarcerated? No Yes, in _____

Interpreter Needed? No Yes _____ (language)

The Scheduling Order deadlines are MODIFIED and calculated from the new trial date
 are NOT MODIFIED by this Order shall be addressed by motion to be heard

Entered: 5/18/20 _____
Calendar Control Judge

ATTACHMENT 7

Elaine Bredehoft

From: Elaine Bredehoft
Sent: Thursday, August 20, 2020 5:01 PM
To: Chew, Benjamin G
Cc: Vasquez, Camille M; Crawford, Andrew C; brottenborn@woodsrogers.com, Joshua Treece, Adam Nadelhaft, David Murphy, Leslie Hoff, Michelle Bredehoft
Subject: RE: Request for Meet and Confer re 1) Consent Order respecting Rule 3.25(D) Attorneys' fees and costs award, and 2) Mr. Depp's Forthcoming Motion to Continue the Current Trial Date
Attachments: 9th RFP - Expedited 8-20-20.pdf
TimeMattersID: MFEB1AC45D071233
TM Contact: Heard, Amber
TM Matter No: 20-5294
TM Matter Reference: Heard, Amber

Ben: I have not heard back from you on the specifics I earlier requested relating to this sudden restart of filming during Depp's deposition and the trial. I have therefore drafted RFPs on this issue. I have asked for them to be expedited, asking you to respond by Sept. 1, to give us sufficient time to fully assess and respond. If you are not in agreement with the expedited responses, then they will be due Sept. 10, so we would ask that you move the motion back to another Friday to give us sufficient time (or we will request this of the Court). I hope you will consider expediting so we can resolve this more quickly.

Please let me know if you have any questions. I would happily accept this information sooner as well, so we can try to determine how to respond. Elaine

Elaine Charlson Bredehoft
Charlson Bredehoft Cohen & Brown, P.C.
11260 Roger Bacon Drive
Suite 201
Reston, VA 20190
(703) 318-6800
(703) 919-2735 (mobile)
(703) 318-6808 (fax)
www.cbcblaw.com

From: Chew, Benjamin G. <BChew@brownrudnick.com>
Sent: Wednesday, August 19, 2020 6:29 PM
To: Elaine Bredehoft <ebredehoft@charlsonbredehoft.com>
Cc: Vasquez, Camille M. <CVasquez@brownrudnick.com>, Crawford, Andrew C <ACrawford@brownrudnick.com>, brottenborn@woodsrogers.com, Joshua Treece <jtreece@woodsrogers.com>; Adam Nadelhaft

<anadelhaft@cbcblaw.com>; David Murphy <DMurphy@cbcblaw.com>; Leslie Hoff <lhoff@charlsonbredehoft.com>, Michelle Bredehoft <mbredehoft@charlsonbredehoft.com>
Subject: Request for Meet and Confer re 1) Consent Order respecting Rule 3 25(D) Attorneys' fees and costs award, and 2) Mr. Depp's Forthcoming Motion to Continue the Current Trial Date

Good evening, Elaine,

Thanks for your message and for agreeing to leave open September 11 for the hearing on Mr. Depp's forthcoming motion for continuance (That is three days after my birthday in case anyone is in a giving mood 😊)

Mr. White was informed today by Warner Bros. that shooting of *Fantastic Beasts 3* will commence in early October 2020 and run through the middle of February 2021. Accordingly, Mr. Depp plans to seek a continuance of the trial date to sometime between March and June 2021. Obviously we are willing to discuss your scheduling preferences if your client is amenable to what would be a relatively brief continuance from January 11

On another subject, approximately how depositions does Ms. Heard plan to notice (understanding that your estimate is subject to change)?

Please let me know what time tomorrow would be most convenient to discuss this and the other issues you raised below

Best regards,

Ben

brownrudnick

Benjamin G. Chew
Partner

Brown Rudnick LLP
601 Thirtieth Street NW Suite 600
Washington, DC 20005
T 202-536-1785
F 617-289-0717
bchew@brownrudnick.com
www.brownrudnick.com

Please consider the environment before printing this e-mail

From: Elaine Bredehoft [<mailto:ebredehoft@charlsonbredehoft.com>]
Sent: Wednesday, August 19, 2020 3:35 PM
To: Chew, Benjamin G.
Cc: Vasquez, Camille M.; Crawford, Andrew C.; brottenborn@woodsrogers.com; Joshua Treece; Adam Nadelhaft; David Murphy; Leslie Hoff; Michelle Bredehoft
Subject: RE: Request for Meet and Confer re 1) Consent Order respecting Rule 3:25(D) Attorneys' fees and costs award; and 2) Mr. Depp's Forthcoming Motion to Continue the Current Trial Date

External E-mail. Use caution accessing links or attachments.

Ben: Yes, I think it may be helpful for us to have a conversation to discuss the fee issue. We also need to talk about the 7th RFPs, and I would like to discuss some other issues that are coming up in the California subpoenas to see if we can resolve them.

On your request for a continuance of the trial, what is the filming schedule for Mr. Depp and when did he learn of this? Also, what is it that you think requires more time based on the Counterclaims?

I am fine with your taking the September 11 Friday hearing date. We would like to schedule our motions for the 18th and 25th. Since no one needs to file their motions this Friday and my Thursday is pretty tight, may I suggest we have the meet and confer Friday after our motions? Alternatively, if you are not available, how about Monday – I can be available Monday afternoon.

Let me know on the questions above and your availability Friday and Monday.

Elaine

Elaine Charlson Bredehoft
Charlson Bredehoft Cohen & Brown, P.C.
11260 Roger Bacon Drive
Suite 201
Reston, VA 20190
(703) 318-6800
(703) 919-2735 (mobile)
(703) 318-6808 (fax)
www.cbcbllaw.com

From: Chew, Benjamin G <BCheW@brownrudnick.com>
Sent: Wednesday, August 19, 2020 12:52 PM
To: Elaine Bredehoft <ebredehoft@charlsonbredehoft.com>
Cc: Vasquez, Camille M <CVasquez@brownrudnick.com>; Crawford, Andrew C. <ACrawford@brownrudnick.com>; brottenborn@woodsrogers.com; Joshua Treece <jtreece@woodsrogers.com>, Adam Nadelhaft <anadelhaft@cbcbllaw.com>, David Murphy <DMurphy@cbcbllaw.com>, Leslie Hoff <lhoff@charlsonbredehoft.com>; Michelle Bredehoft <mbredehoft@charlsonbredehoft.com>
Subject: Request for Meet and Confer re 1) Consent Order respecting Rule 3 25(D) Attorneys' fees and costs award, and 2) Mr Depp's Forthcoming Motion to Continue the Current Trial Date

Dear Elaine.

I confess to being unfamiliar with this procedure and request that we have a meet and confer on this tomorrow at your convenience

At the same time I would like to discuss whether Ms. Heard would agree to Mr Depp's forthcoming motion to continue the existing trial date based on, inter alia, the conflict with the shooting of Fantastic Beasts 3 and the \$ 100 million Counterclaims you filed just last week (August 10) We plan to file the motion this Friday and set it for hearing on Friday, September 11.

I look forward to discussing these matters with you tomorrow.

Best regards,

Ben

Sent from my iPhone

On Aug 17, 2020, at 6 26 PM, Elaine Bredehoft <ebredehoft@charlsonbredehoft.com> wrote

External E-mail Use caution accessing links or attachments.

Ben: May I have a response to this please? Thank you. Elaine

Elaine Charlson Bredehoft
Charlson Bredehoft Cohen & Brown, P C.
11260 Roger Bacon Drive
Suite 201
Reston, VA 20190
(703) 318-6800
(703) 919-2735 (mobile)
(703) 318-6808 (fax)
www.cbcbllaw.com<<http://www.cbcbllaw.com>>

From: Elaine Bredehoft
Sent Thursday, August 13, 2020 4:29 PM
To: bchew@brownrudnick.com; Vasquez, Camille M <CVasquez@brownrudnick.com>; Crawford, Andrew C. <ACrawford@brownrudnick.com>
Cc: brottenborn@woodsrogers.com, Joshua Treece <jtreece@woodsrogers.com>; Adam Nadelhaft <anadelhaft@cbcbllaw.com>, David Murphy <DMurphy@cbcbllaw.com>, Leslie Hoff <lhoff@charlsonbredehoft.com>, Michelle Bredehoft <mbredehoft@charlsonbredehoft.com>
Subject Consent Order respecting Rule 3.25(D) Attorneys' fees and costs award

Ben, Camille and Andrew Attached for your review is a Consent Order respecting the treatment of attorneys' fees and costs by the Court in the event Ms Heard prevails, and the Court determines an award of fees and costs are reasonable Under Rule 3 25(D), any party may request this, or the Court may sua sponte order it. As you know, Ms Heard has pleaded the Anti Slapp provision, and under the statute, if she prevails and the Court determines it qualifies under the First Amendment, she would be entitled to fees and costs.

Please review and let me know if you have any suggested edits and agree If you are unwilling to enter into a Consent Order, please also let me know, so we can file the appropriate motion and schedule this before the Court I hope that will not be necessary, as this is the preferred practice and one the Court suggests we resolve early on.

Please feel free to give me a call to discuss I look forward to hearing from you Elaine

Elaine Charlson Bredehoft
Charlson Bredehoft Cohen & Brown, P.C.
11260 Roger Bacon Drive
Suite 201
Reston, VA 20190
(703) 318-6800
(703) 919-2735 (mobile)
(703) 318-6808 (fax)
www.cbcbllaw.com<<http://www.cbcbllaw.com>>

.....

The information contained in this electronic message may be legally privileged and confidential under applicable law, and is intended only for the use of the individual or entity named above. If the recipient of this message is not the above-named intended recipient, you are hereby notified that any dissemination, copy or disclosure of this communication is strictly prohibited. If you have received this communication in error, please notify Brown Rudnick LLP, (617) 856-8200 (if dialing from outside the US, 001-(617)-856-8200) and purge the communication immediately without making any copy or distribution.

To the extent Brown Rudnick is a "data controller" of the "personal data" (as each term is defined in the European General Data Protection Regulation) you have provided to us in this and other communications between us, please see our privacy statement and summary [here](#) which sets out details of the data controller, the personal data we have collected, the purposes for which we use it (including any legitimate interests on which we rely), the persons to whom we may transfer the data and how we intend to transfer it outside the European Economic Area

.....

.....

The information contained in this electronic message may be legally privileged and confidential under applicable law, and is intended only for the use of the individual or entity named above. If the recipient of this message is not the above-named intended recipient, you are hereby notified that any dissemination, copy or disclosure of this communication is strictly prohibited. If you have received this communication in error, please notify Brown Rudnick LLP, (617) 856-8200 (if dialing from outside the US, 001-(617)-856-8200) and purge the communication immediately without making any copy or distribution.

To the extent Brown Rudnick is a "data controller" of the "personal data" (as each term is defined in the European General Data Protection Regulation) you have provided to us in this and other communications between us, please see our privacy statement and summary [here](#) which sets out details of the data controller, the personal data we have collected, the purposes for which we use it (including any legitimate interests on which we rely), the persons to whom we may transfer the data and how we intend to transfer it outside the European Economic Area

.....

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 EXPEDITED REQUEST - NINTH SET OF REQUESTS FOR PRODUCTION TO PLAINTIFF JOHN C. DEPP, II

Defendant Amber Laura Heard, by counsel, pursuant to Rules 4: 1 and 4:9 of the Rules of the Supreme Court of Virginia, requests that Plaintiff John C. Depp, II, respond to the following Requests for Production ("Requests") on an expedited basis, no later than September 1, 2020, in accordance with the Instructions and Definitions set forth below.

INSTRUCTIONS

1. In accordance with the Rules of this Court, You shall answer the following Requests separately and fully, in writing.
2. Where information in Your possession is requested, such request includes nonprivileged information in the possession of Your agent(s), employec(s), assign(s), representative(s), and all others acting on Your behalf.
3. Whenever appropriate in these Requests, the singular form of a word shall be interpreted as its plural to whatever extent is necessary to bring within the scope of these Requests
any information which might otherwise be construed to be outside their scope.
4. Unless otherwise indicated, these Requests refer to the time, place, and circumstances of the occurrences mentioned or complained of in the pleadings in this case.
5. All references to an entity include the entity and its agents, officers, employees, representatives, subsidiaries, divisions, successors, predecessors, assigns, parents, affiliates, and unless privileged, its attorneys and accountants

6 If You perceive any ambiguities in a question, instruction, definition, or other aspect of these discovery requests, set forth the matter deemed ambiguous and the construction used in answering.

7. If You assert a claim of privilege as to any of Your responses to the Requests, state the basis for the asserted privilege, specify the privilege claimed, and include in Your answer sufficient information to permit the Court to make an informed ruling on the claim of privilege. If the claim relates to a privileged document, state the date, person or persons who prepared or participated in preparing the document, the name and address of any person to whom the document was shown or sent, the general subject matter of the document, the present or last known location and custodian of the original of the document, and the basis for the claim of privilege with respect to the document. If the claim of privilege relates to a communication, state the date(s), place(s) and person(s) involved in the communication, the subject matter of the communication, and the basis for the claim of privilege with respect to that communication. Reliance on any claim of privilege is subject to the Rules of this Court, including the production of a privilege log.

8. If You perceive any Request to be overly broad, unduly burdensome, or objectionable for any other reason, respond to the fullest extent possible and clearly note any objection so that the Court will be permitted to make an informed ruling on the objection.

9. These Requests are continuing in character so as to require You to promptly amend or supplement Your responses in accordance with the Rules of the Supreme Court of Virginia within a reasonable time if You obtain or become aware of any further information responsive to these Requests. Ms. Heard reserves the right to propound additional Requests.

10. Unless otherwise indicated, these requests include the time from when the parties met, in 2008.

DEFINITIONS

a. *Action*. The term "Action" means the above-captioned action.

b. *Communication*. The term "communication" means any oral or written exchange of words, thoughts, or ideas to another person, whether person-to-person, in a group, by phone, text (SMS), letter, fax, e-mail, internet post or correspondence, social networking post or correspondence or by any other process, electric, electronic, or otherwise. All such

Communications are included without regard to the storage or transmission medium (electronically stored information and hard copies are included within this definition).

c. *Document.* The term "document" is defined in its broadest terms currently recognized. The term shall include, without limitations: any written or other compilation of information (whether printed, handwritten, recorded, or encoded, produced, reproduced, or reproducible by any other process), drafts (revisions or finals), original or preliminary notes, and summaries of other documents, communications of any type (e-mail, text messages, blog posts, social media posts or other similar communications or correspondence), computer tape, computer files, and including all of their contents and attached files. The term "document" shall also include but not be limited to: correspondence, memoranda, contractual documents, specifications, drawings, photographs, images, aperture cards, notices of revisions, test reports, inspection reports, evaluations, technical reports, schedules, agreements, reports, studies, analyses, projections, forecasts, summaries, records of conversations or interviews, minutes or records of conferences or meetings, manuals, handbooks, brochures, pamphlets, advertisements, circulars, press releases, financial statements, calendars, diaries, trip reports, etc. A draft of a non-identical copy is a separate document within the meaning of this term.

d. *Correspondence.* The term "correspondence" means any document(s) and/or communication(s) sent to or received from another entity and/or person.

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

f. *Concerning.* The term "concerning" includes relating to, referring to, describing, evidencing, or constituting.

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

h. *And/or.* The use of "and/or" shall be interpreted in every instance both conjunctively and disjunctively in order to bring within the scope of these discovery requests any information which might otherwise be construed to be outside their scope.

i. *Defendant and/or Ms. Heard.* The terms "Defendant" and/or "Ms. Heard" refer to Defendant Amber Laura Heard, including her agents, representatives, employees, assigns, and all persons acting on her behalf.

j. *Plaintiff and/or Mr. Depp.* The terms "Plaintiff" and/or "Mr. Depp" refer to

Plaintiff John C. Depp, II, including his agents, representatives, employees, assigns, and all persons acting on his behalf.

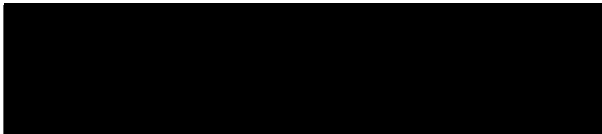
k. *Complaint*. The term "Complaint" shall mean the Complaint filed by Plaintiff in this Action.

1. *You and/or Yours*. 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.

REQUESTS

1. All communications between Warner Bros Entertainment Inc. and Mr. Depp, or anyone on his behalf, relating to restarting and scheduling of the filming of *Fantastic Beasts 3* in 2020 and 2021.
2. All communications between Warner Bros Entertainment Inc. and Mr. Depp, or anyone on his behalf, relating to Mr. Depp's specific filming schedule.
3. All communications between Warner Bros Entertainment Inc. and Mr. Depp, or anyone on his behalf, relating to any efforts by Mr. Depp to work around his scheduled deposition and trial.
4. All communications between Warner Bros Entertainment Inc. and Mr. Depp, or anyone on his behalf, relating to and including Mr. Depp's call sheet.
5. All insurance forms and doctor's reports relating to whether Mr. Depp has been cleared for and is fit to film *Fantastic Beasts 3*.
6. A sworn statement or Declaration by Mr. Depp stating when he has to report to the set of *Fantastic Beasts 3*, his very specific schedule for filming, his efforts to work around his scheduled Deposition in this case and the trial, and when he learned of his specific shooting schedule.

August 20, 2020



Elaine Charlson Bredehoff (VSB No. 23766)
Adam S. Nadelhaft (VSB No. 91717)
David E. Murphy (VSB No. 90938)
Charlson Bredehoff Cohen & Brown, P.C.
11260 Roger Bacon Drive, Suite 201
Reston, Virginia 20190
Telephone: (703) 318-6800
ebredehoff@cbeblaw.com
anadelhaft@cbeblaw.com
dmurphy@cbeblaw.com

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

Counsel to Defendant Amber Laura Head

CERTIFICATE OF SERVICE

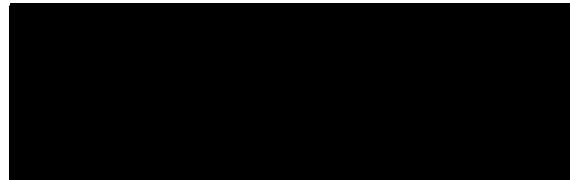
I hereby certify that a true and correct copy of the foregoing was served this 20th day of August 2020, by email, by agreement of the parties, addressed as follows.

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

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

Counsel for Plaintiff John C Depp II

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



Elaine Charlson Bredeholt (VSB No. 23766)

6. If You perceive any ambiguities in a question, instruction, definition, or other aspect of these discovery requests, set forth the matter deemed ambiguous and the construction used in answering.

7. If You assert a claim of privilege as to any of Your responses to the Requests, state the basis for the asserted privilege, specify the privilege claimed, and include in Your answer sufficient information to permit the Court to make an informed ruling on the claim of privilege. If the claim relates to a privileged document, state the date, person or persons who prepared or participated in preparing the document, the name and address of any person to whom the document was shown or sent, the general subject matter of the document, the present or last known location and custodian of the original of the document, and the basis for the claim of privilege with respect to the document. If the claim of privilege relates to a communication, state the date(s), place(s) and person(s) involved in the communication, the subject matter of the communication, and the basis for the claim of privilege with respect to that communication. Reliance on any claim of privilege is subject to the Rules of this Court, including the production of a privilege log.

8. If You perceive any Request to be overly broad, unduly burdensome, or objectionable for any other reason, respond to the fullest extent possible and clearly note any objection so that the Court will be permitted to make an informed ruling on the objection.

9. These Requests are continuing in character so as to require You to promptly amend or supplement Your responses in accordance with the Rules of the Supreme Court of Virginia within a reasonable time if You obtain or become aware of any further information responsive to these Requests. Ms. Heard reserves the right to propound additional Requests.

10. Unless otherwise indicated, these requests include the time from when the parties met, in 2008.

DEFINITIONS

a. ***Action.*** The term "Action" means the above-captioned action.

b. ***Communication.*** The term "communication" means any oral or written exchange of words, thoughts, or ideas to another person, whether person-to-person, in a group, by phone, text (SMS), letter, fax, e-mail, internet post or correspondence, social networking post or correspondence or by any other process, electric, electronic, or otherwise. All such

Communications are included without regard to the storage or transmission medium (electronically stored information and hard copies are included within this definition).

c. **Document.** The term "document" is defined in its broadest terms currently recognized. The term shall include, without limitations: any written or other compilation of information (whether printed, handwritten, recorded, or encoded, produced, reproduced, or reproducible by any other process), drafts (revisions or finals), original or preliminary notes, and summaries of other documents, communications of any type (e-mail, text messages, blog posts, social media posts or other similar communications or correspondence), computer tape, computer files, and including all of their contents and attached files. The term "document" shall also include but not be limited to: correspondence, memoranda, contractual documents, specifications, drawings, photographs, images, aperture cards, notices of revisions, test reports, inspection reports, evaluations, technical reports, schedules, agreements, reports, studies, analyses, projections, forecasts, summaries, records of conversations or interviews, minutes or records of conferences or meetings, manuals, handbooks, brochures, pamphlets, advertisements, circulars, press releases, financial statements, calendars, diaries, trip reports, etc. A draft of a non-identical copy is a separate document within the meaning of this term.

d. **Correspondence.** The term "correspondence" means any document(s) and/or communication(s) sent to or received from another entity and/or person.

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

f. **Concerning.** The term "concerning" includes relating to, referring to, describing, evidencing, or constituting.

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

h. **And/or.** The use of "and/or" shall be interpreted in every instance both conjunctively and disjunctively in order to bring within the scope of these discovery requests any information which might otherwise be construed to be outside their scope.

i. **Defendant and/or Ms. Heard.** The terms "Defendant" and/or "Ms. Heard" refer to Defendant Amber Laura Heard, including her agents, representatives, employees, assigns, and all persons acting on her behalf.

j. **Plaintiff and/or Mr. Depp.** The terms "Plaintiff" and/or "Mr. Depp" refer to

Plaintiff John C. Depp, II, including his agents, representatives, employees, assigns, and all persons acting on his behalf.


k. **Complaint.** The term "Complaint" shall mean the Complaint filed by Plaintiff in this Action.

1. **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.

REQUESTS

1. All communications between Warner Bros. Entertainment Inc. and Mr. Depp, or anyone on his behalf, relating to restarting and scheduling of the filming of Fantastic Beasts 3 in 2020 and 2021.
2. All communications between Warner Bros. Entertainment Inc. and Mr. Depp, or anyone on his behalf, relating to Mr. Depp's specific filming schedule.
3. All communications between Warner Bros. Entertainment Inc. and Mr. Depp, or anyone on his behalf, relating to any efforts by Mr. Depp to work around his scheduled deposition and trial.
4. All communications between Warner Bros. Entertainment Inc. and Mr. Depp, or anyone on his behalf, relating to and including Mr. Depp's call sheet.
5. All insurance forms and doctor's reports relating to whether Mr. Depp has been cleared for and is fit to film Fantastic Beasts 3.
6. A sworn statement or Declaration by Mr. Depp stating when he has to report to the set of Fantastic Beasts 3, his very specific schedule for filming, his efforts to work around his scheduled Deposition in this case and the trial, and when he learned of his specific shooting schedule.

August 20, 2020



Elaine Charlson Bredehoft (VSB No. 23766)
Adam S. Nadelhaft (VSB No. 91717)
David E. Murphy (VSB No. 90938)
Charlson Bredehoft Cohen & Brown, P.C.
11260 Roger Bacon Drive, Suite 201
Reston, Virginia 20190
Telephone: (703) 318-6800
ebredehoft@cbcblaw.com
anadelhaft@cbcblaw.com
dmurphy@cbcblaw.com

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

Counsel to Defendant Amber Laura Heard

CERTIFICATE OF SERVICE

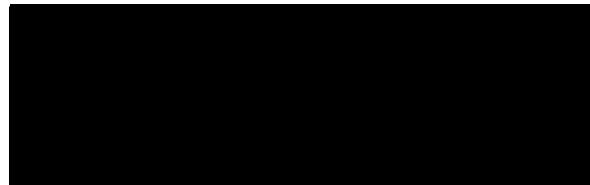
I hereby certify that a true and correct copy of the foregoing was served this 20th day of August 2020, by email, by agreement of the parties, addressed as follows:

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



Elaine Charlson Bredehoff (VSB No. 23766)

ATTACHMENT 9

2. Plaintiff objects to each and every Request to the extent that the Requests (including the “Definitions” and “Instructions” identified in the Requests) (a) are overly broad or unduly burdensome; (b) are vague, ambiguous, duplicative, cumulative, or do not identify with reasonable particularity the information sought; (c) call for information that is neither relevant nor reasonably calculated to lead to the discovery of admissible evidence; (d) seek to impose obligations on Plaintiff beyond or inconsistent with those required by Virginia law and the rules of this Court (“Rules”); or (e) purport to seek documents or information not in Plaintiff’s actual possession, custody, or control; any statement herein that Plaintiff will produce documents responsive to a specific Request means that Plaintiff will produce documents located through a reasonable search for documents in its possession, custody, and control.

3. Plaintiff objects to the extent that the discovery sought by the Requests is obtainable from some other source that is more convenient, less burdensome, or less expensive.

4. Plaintiff objects to the extent the discovery sought is unduly burdensome or expensive, taking into account the needs of the case, the amount in controversy, limitations on the parties’ resources, and the importance of the issues at stake in the litigation.

5. Plaintiff objects to each and every Request, Definition, and Instruction to the extent that they purport to require production of documents at a specified time or place, or in a specified manner. Plaintiff will make documents available in accordance with Rule 4:9 and any agreement among the parties or orders of the Court governing the conduct of discovery.

6. Plaintiff objects to the Requests to the extent that they seek documents or information protected by the attorney-client privilege, the work product doctrine, or any other applicable privilege, protection, exemption or immunity. Plaintiff will produce only non-privileged information. Inadvertent disclosure of any privileged or otherwise protected

documents or information shall not constitute a waiver of any claim of privilege, protection, exemption or immunity. Plaintiff reserves the right to redact documents produced in response to the Requests.

7. Plaintiff objects to the Requests, including the Definitions and Instructions contained therein, to the extent they seek documents or information protected from disclosure as being a trade secret or other confidential business or proprietary information, or documents or information that, if produced or disclosed, would result in the violation of any contractual obligation to third parties, or any applicable right to privacy of Plaintiff or third parties.

8. Plaintiff objects to any Request seeking “all” documents on the grounds that Plaintiff cannot guarantee that he has located every single document responsive to a particular Request. Subject to the general objections and any qualifications below, Plaintiff will respond to any Request seeking “all” documents by producing the responsive, non-privileged documents within its possession, custody, and control that can be located after a reasonable search conducted in good faith.

9. Plaintiff reserves the right to produce documents responsive to the Requests on a rolling basis at a time, place, and manner to be agreed on by the parties.

10. Plaintiff objects to the Requests, including the Definitions and Instructions contained therein, to the extent that they are redundant or duplicative of other specific Requests. Where information or a document may be responsive to more than one Request, Plaintiff will provide that information or produce that document only once.

11. Plaintiff objects to the Requests to the extent that they purport to require the identification and/or restoration of any deleted, legacy, backup, or archival data, or otherwise

seek the production of any document that is not accessible without undue burden or unreasonable expense.

12. Plaintiff objects to each of the Requests to the extent that the Requests or related Instructions purport to impose any discovery obligations on Plaintiff beyond those already imposed by applicable law.

13. Plaintiff's responses to the Requests are not intended to be, nor shall be deemed, an admission of matters stated, implied, or assumed by any or all of the Requests. In responding to the Requests, Plaintiff neither waives nor intends to waive, but expressly reserves, any and all objections as to the authenticity, relevance, competency, materiality, or admissibility at trial or during any proceeding of any information or documents produced, set forth, or referred to herein.

14. Any response by Plaintiff stating that it will produce documents is not intended as a representation that such documents exist within any requested category or categories but solely as an assertion that Plaintiff will produce (consistent with these Responses and Objections) any non-privileged, responsive documents or information within its actual possession, custody, or control that can be located after a reasonable search conducted in good faith.

15. Plaintiff objects to any factual assumptions, implications, and explicit or implicit characterizations of facts, events, circumstances, or issues in the Requests. Plaintiff's responses herein are not intended to mean that Plaintiff agrees with any factual assumptions, implications, or any explicit or implicit characterization of facts, events, circumstances, or issues in the Requests, and are without prejudice to Plaintiff's right to dispute facts and legal conclusions assumed in the Requests.

16. These objections and responses are based on Plaintiff's present knowledge, information, and belief, and therefore remain subject to change or modification based on further

discovery of facts or circumstances that may come to Plaintiff's attention. Plaintiff reserves the right to rely on any facts, documents, evidence, or other contentions that may develop or come to its attention at a later time and to supplement or amend the responses at any time prior to the trial. Plaintiff further reserves the right to raise any additional objections deemed necessary or appropriate in light of any further review.

OBJECTIONS TO INSTRUCTIONS AND DEFINITIONS

Instructions

1. In accordance with the Rules of this Court, You shall answer the following Requests separately and fully, in writing.

RESPONSE: No objection.

2. Where information in Your possession is requested, such request includes nonprivileged information in the possession of Your agent(s), employee(s), assign(s), representative(s), and all others acting on Your behalf.

RESPONSE: Plaintiff objects to this instruction as overly broad and unduly burdensome, to the extent that it requires production of documents from individuals not under Plaintiff's control. Plaintiff will produce documents from a limited number of custodians to be negotiated with Defendant in good faith.

3. Whenever appropriate in these Requests, the singular form of a word shall be interpreted as its plural to whatever extent is necessary to bring within the scope of these Requests any information which might otherwise be construed to be outside their scope.

RESPONSE: No objection.

4. Unless otherwise indicated, these Requests refer to the time, place, and circumstances of the occurrences mentioned or complained of in the pleadings in this case.

RESPONSE: Plaintiff objects to this instruction as overly broad and unduly burdensome, to the extent that it requires production of documents not within the possession, custody or control of Plaintiff. Plaintiff will produce documents from

a relevant time period to be negotiated with Defendant in good faith. Plaintiff further objects to this instruction as vague and ambiguous

5. All references to an entity include the entity and its agents, officers, employees, representatives, subsidiaries, divisions, successors, predecessors, assigns, parents, affiliates, and unless privileged, its attorneys and accountants.

RESPONSE: Plaintiff objects to this instruction as overly broad and unduly burdensome, to the extent that it requires production of documents from individuals and entities other than Plaintiff and/or documents that are not within Plaintiff's custody and control.

6. If You perceive any ambiguities in a question, instruction, definition, or other aspect of these discovery requests, set forth the matter deemed ambiguous and the construction used in answering.

RESPONSE: No objection.

7. If You assert a claim of privilege as to any of Your responses to the Requests, state the basis for the asserted privilege, specify the privilege claimed, and include in Your answer sufficient information to permit the Court to make an informed ruling on the claim of privilege. If the claim relates to a privileged document, state the date, person or persons who prepared or participated in preparing the document, the name and address of any person to whom the document was shown or sent, the general subject matter of the document, the present or last known location and custodian of the original of the document, and the basis for the claim of privilege with respect to the document. If the claim of privilege relates to a communication, state the date(s), place(s) and person(s) involved in the communication, the subject matter of the communication, and the basis for the claim of privilege with respect to that communication. Reliance on any claim of privilege is subject to the Rules of this Court, including the production of a privilege log.

RESPONSE: Plaintiff objects to this instruction as overly broad and unduly burdensome, to the extent that it requires Plaintiff to produce a privilege log in a specific manner at a specific time. Plaintiff will produce a privilege log at a time and in a manner to be negotiated with Defendant in good faith.

8. If You perceive any Request to be overly broad, unduly burdensome, or objectionable for any other reason, respond to the fullest extent possible and clearly note any objection so that the Court will be permitted to make an informed ruling on the objection.

RESPONSE: No objection.

9. These Requests are continuing in character so as to require You to promptly amend or supplement Your responses in accordance with the Rules of the Supreme Court of Virginia within a reasonable time if You obtain or become aware of any further information responsive to these Requests. Ms. Heard reserves the right to propound additional Requests.

RESPONSE: No objection.

10. Unless otherwise indicated, these requests include the time from when the parties met, in 2008.

RESPONSE: Plaintiff objects to this instruction as overly broad, unduly burdensome, and harassing to the extent that it purports to require Plaintiff to produce documents from a twelve-year timeframe that encompasses documents that are not relevant to the subject matter of this action.

Definitions

a. ***Action.*** The term “Action” means the above-captioned action.

RESPONSE: No objection.

b. ***Communication.*** The term “communication” means any oral or written exchange of words, thoughts, or ideas to another person, whether person-to-person, in a group, by phone, text (SMS), letter, fax, e-mail, internet post or correspondence, social networking post or correspondence or by any other process, electric, electronic, or otherwise. All such

Communications are included without regard to the storage or transmission medium (electronically stored information and hard copies are included within this definition).

RESPONSE: No objection.

c. ***Document.*** The term “document” is defined in its broadest terms currently recognized. The term shall include, without limitations: any written or other compilation of information (whether printed, handwritten, recorded, or encoded, produced, reproduced, or reproducible by any other process), drafts (revisions or finals), original or preliminary notes, and summaries of other documents, communications of any type (e-mail, text messages, blog posts, social media posts or other similar communications or correspondence), computer tape, computer files, and including all of their contents and attached files. The term “document” shall also include but not be limited to: correspondence, memoranda, contractual documents, specifications, drawings, photographs, images, aperture cards, notices of revisions, test reports, inspection reports, evaluations, technical reports, schedules, agreements, reports, studies, analyses, projections, forecasts, summaries, records of conversations or interviews, minutes or records of conferences or meetings, manuals, handbooks, brochures, pamphlets, advertisements, circulars, press releases, financial statements, calendars, diaries, trip reports, etc. A draft of a non-identical copy is a separate document within the meaning of this term.

RESPONSE: Plaintiff objects to this definition as overly broad and unduly burdensome, and to the extent that it seeks to impose burdens beyond what are required by the Rules.

d. ***Correspondence.*** The term “correspondence” means any document(s) and/or communication(s) sent to or received from another entity and/or person.

RESPONSE: Plaintiff objects to this definition as overly broad and unduly burdensome, to the extent that it is duplicative of the terms Document and Communication, and to the extent that it seeks to impose burdens beyond what are required by the Rules.

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

RESPONSE: No objection.

f. **Concerning.** The term “concerning” includes relating to, referring to, describing, evidencing, or constituting.

RESPONSE: No objection.

g. **Including.** The term “including” means including but not limited to.

RESPONSE: No objection.

h. **And/or.** The use of “and/or” shall be interpreted in every instance both conjunctively and disjunctively in order to bring within the scope of these discovery requests any information which might otherwise be construed to be outside their scope.

RESPONSE: No objection.

i. **Defendant and/or Ms. Heard.** The terms “Defendant” and/or “Ms. Heard” refer to Defendant Amber Laura Heard, including her agents, representatives, employees, assigns, and unless privileged, all persons acting on her behalf.

RESPONSE: Plaintiff objects to this definition as overly broad and unduly burdensome, to the extent that it is inclusive of “agents, representatives, employees, assigns, and unless privileged, all persons acting on her behalf.”

j. **Plaintiff and/or Mr. Depp.** The terms “Plaintiff” and/or “Mr. Depp” refer to Plaintiff John C. Depp, II, including his agents, representatives, employees, assigns, and all persons acting on his behalf.

RESPONSE: Plaintiff objects to this definition as overly broad and unduly burdensome, to the extent that it is inclusive of “agents, representatives, employees, assigns, and all persons acting on his behalf.” Plaintiff will interpret this term to exclude all privileged communications and documents.

k. **Complaint.** The term “Complaint” shall mean the Complaint filed by Plaintiff in this Action.

RESPONSE: No objection.

l. **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.

REQUESTS

1. All communications between Warner Bros. Entertainment Inc. and Mr. Depp, or anyone on his behalf, relating to restarting and scheduling of the filming of *Fantastic Beasts 3* in 2020 and 2021.

RESPONSE:

Plaintiff repeats and incorporates by this reference the General Objections and Objections to Definitions and Instruction above, as though set forth in full. Plaintiff further objects to this Request on the grounds that it seeks documents that are neither relevant nor reasonably calculated to lead to the discovery of admissible evidence. Plaintiff further objects to this Request on the grounds that it is overly broad, unduly burdensome, and harassing because it purports to seek information unrelated to the subject matter of this case. Plaintiff further objects to this Request on the grounds that it seeks confidential, proprietary, and private personal and/or business information of Plaintiff and/or third parties to this litigation, which is not subject to discovery in this action. Plaintiff further objects to this Request to the extent that it seeks documents protected by the attorney-client privilege, work product doctrine, and/or any other applicable privilege, immunity, or protection.

Accordingly, Plaintiff will not produce documents in response to this Request.

2. All communications between Warner Bros. Entertainment Inc. and Mr. Depp, or anyone on his behalf, relating to Mr. Depp's specific filming schedule.

RESPONSE:

Plaintiff repeats and incorporates by this reference the General Objections and Objections to Definitions and Instruction above, as though set forth in full. Plaintiff further objects to this Request on the grounds that it seeks documents that are neither relevant nor reasonably calculated to lead to the discovery of admissible evidence. Plaintiff further objects to this Request on the grounds that it is overly broad, unduly burdensome, and harassing because it purports to seek information unrelated to the subject matter of this case. Plaintiff further objects to this Request on the grounds that it seeks confidential, proprietary, and private personal and/or business information of Plaintiff and/or third parties to this litigation, which is not subject to discovery in this action. Plaintiff further objects to this Request to the extent that it seeks documents protected by the attorney-client privilege, work product doctrine, and/or any other applicable privilege, immunity, or protection.

Accordingly, Plaintiff will not produce documents in response to this Request.

3. All communications between Warner Bros. Entertainment Inc. and Mr. Depp, or anyone on his behalf, relating to any efforts by Mr. Depp to work around his scheduled deposition and trial.

RESPONSE:

Plaintiff repeats and incorporates by this reference the General Objections and Objections to Definitions and Instruction above, as though set forth in full. Plaintiff further objects to this Request on the grounds that it seeks documents that are neither relevant nor reasonably calculated to lead to the discovery of admissible evidence. Plaintiff further objects to this Request on the grounds that it is overly broad, unduly burdensome, and harassing because it purports to seek information unrelated to the subject matter of this case. Plaintiff further objects

to this Request on the grounds that it seeks confidential, proprietary, and private personal and/or business information of Plaintiff and/or third parties to this litigation, which is not subject to discovery in this action. Plaintiff further objects to this Request to the extent that it seeks documents protected by the attorney-client privilege, work product doctrine, and/or any other applicable privilege, immunity, or protection.

Accordingly, Plaintiff will not produce documents in response to this Request.

4. All communications between Warner Bros. Entertainment Inc. and Mr. Depp, or anyone on his behalf, relating to and including Mr. Depp's call sheet.

RESPONSE:

Plaintiff repeats and incorporates by this reference the General Objections and Objections to Definitions and Instruction above, as though set forth in full. Plaintiff further objects to this Request on the grounds that it seeks documents that are neither relevant nor reasonably calculated to lead to the discovery of admissible evidence. Plaintiff further objects to this Request on the grounds that it is overly broad, unduly burdensome, and harassing because it purports to seek information unrelated to the subject matter of this case. Plaintiff further objects to this Request on the grounds that it seeks confidential, proprietary, and private personal and/or business information of Plaintiff and/or third parties to this litigation, which is not subject to discovery in this action. Plaintiff further objects to this Request to the extent that it seeks documents protected by the attorney-client privilege, work product doctrine, and/or any other applicable privilege, immunity, or protection.

Accordingly, Plaintiff will not produce documents in response to this Request.

5. All insurance forms and doctor's reports relating to whether Mr. Depp has been cleared for and is fit to film *Fantastic Beasts 3*.

RESPONSE:

Plaintiff repeats and incorporates by this reference the General Objections and Objections to Definitions and Instruction above, as though set forth in full. Plaintiff further objects to this Request on the grounds that it seeks documents that are neither relevant nor reasonably calculated to lead to the discovery of admissible evidence. Plaintiff further objects to this Request on the grounds that it is overly broad, unduly burdensome, and harassing because it purports to seek information unrelated to the subject matter of this case. Plaintiff further objects to this Request on the grounds that it seeks confidential, proprietary, and private personal and/or business information of Plaintiff and/or third parties to this litigation, which is not subject to discovery in this action. Plaintiff further objects to this Request to the extent that it seeks documents protected by the attorney-client privilege, work product doctrine, and/or any other applicable privilege, immunity, or protection. Plaintiff further objects to this Request on the grounds that it seeks private personal medical information that is not at issue.

Accordingly, Plaintiff will not produce documents in response to this Request.

6. A sworn statement or Declaration by Mr. Depp stating when he has to report to the set of *Fantastic Beasts 3*, his very specific schedule for filming, his efforts to work around his scheduled Deposition in this case and the trial, and when he learned of his specific shooting schedule.

RESPONSE:

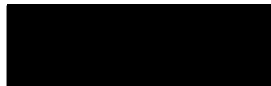
Plaintiff repeats and incorporates by this reference the General Objections and Objections to Definitions and Instruction above, as though set forth in full. Plaintiff further objects to this Request on the grounds that it seeks documents that are neither relevant nor reasonably calculated to lead to the discovery of admissible evidence. Plaintiff further objects to this Request on the grounds that it is overly broad, unduly burdensome, and harassing because it purports to seek information unrelated to the subject matter of this case. Plaintiff further objects to this Request on the grounds that it seeks confidential, proprietary, and private personal and/or

business information of Plaintiff and/or third parties to this litigation, which is not subject to discovery in this action. Plaintiff further objects to this Request to the extent that it seeks documents protected by the attorney-client privilege, work product doctrine, and/or any other applicable privilege, immunity, or protection. Plaintiff further objects to this Request on the grounds that it seeks to impose on Plaintiff an obligation to generate a declaration to be produced in discovery and exceeds the obligations applicable to discovery.

Accordingly, Plaintiff will not produce documents in response to this Request.

Dated: September 10, 2020

Respectfully submitted,



Benjamin G. Chew (VSB #29113)
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 -

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

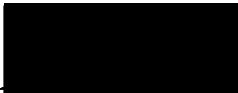
CERTIFICATE OF SERVICE

I hereby certify that on this ^{9th} 10th day of September 2020, I caused copies of the foregoing to be served via email (per written agreement between the Parties) on the following:

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
jtreecc@woodsrogers.com

Elaine Charlson Bredehoft (VSB No. 23766)
Carla D. Brown (VSB No. 44803)
Adam S. Nadelhaft (VSB No. 91717)
David E. Murphy (VSB No. 90938)
CHARLSON BREDEHOFT COHEN &
BROWN, P.C.
11260 Roger Bacon Dr., Suite 201
Reston, VA 20190
Phone: 703-318-6800
Fax: 703-318-6808
ebredehoft@cbcblaw.com
cbrown@cbcblaw.com
anadelhaft@cbcblaw.com
dmurphy@cbcblaw.com

63843480


Benjamin G. Chew

ATTACHMENT 10

Elaine Bredehoft

From: Elaine Bredehoft
Sent: Thursday, August 27, 2020 9:52 AM
To: Chew, Benjamin G
Cc: brottenborn@woodsrogers.com, Treece, Joshua, Adam Nadelhaft, David Murphy; Michelle Bredehoft, Leslie Hoff, Vasquez, Camille M ; cmariam@grsm.com, jcogger@grsm.com; Kristin Blocher; Crawford, Andrew C
Subject: RE Depp deposition and location

TimeMattersID: M3798AC46D655701
TM Contact: Heard, Amber
TM Matter No: 20-5294
TM Matter Reference: Heard, Amber

Ben: I have added the remainder of the team to this email chain, given the breadth of the issue.

Thanks for your response, but there is much more to this than a mere suggestion that you may make the Plaintiff in this case available by Web X in London in late September. Mr. Depp is currently under an obligation to appear in our offices the week of October 5. I am attempting to explore all potential alternatives in light of your motion for continuance (which, frankly, is your obligation, not mine, but I am genuinely trying to work this through).

First, you have 50-51 tapes between Ms. Heard and Mr. Depp that you have promised to produce, were due in July, and Chief Judge White told you that you cannot produce on a rolling basis, you need to produce them within the Rules. If we do not receive those today or tomorrow, so we can listen to them and transcribe, then it will be virtually impossible for us to be able to depose Mr. Depp before October 5, and likely we will have to move it later or leave the deposition open. That is not the only request that is far overdue now, and many others also are necessary for his deposition, but I think the tape recordings highlight the timing issue best.

Second, we will need to have a court reporter and a videographer present (unless the parties can agree to an alternative protocol, which I invited in early August and you have not proposed any protocols contrary to my suggestions). We also will require an attorney to be present, especially if Mr. Depp has one present. This would rule out London, because if the UK allows US citizens to enter in the country, there will be a 14 day quarantine rule in effect.

Third, we need sufficient facilities to be able to show and discuss documents, photographs, videos and audio recordings. Fairfax Circuit Court has recognized the limitations of the Web X system for these, and as a practical matter, the best way to accomplish this is for many of those documents and media to be presented in the room with the deponent. This is why I

asked for Mr. Depp's location from now until his travels for the filming – if, for example, he is in California, although he is obligated to appear in Fairfax County, we would be amenable to working with you to take his deposition there, because we have counsel present in California and could make all of this work through a combination of technology (zoom) and our legal team's conference room (assuming you deliver the far overdue documents and tapes asap).

So I again ask, where is Mr. Depp located, and what dates is he available between now and his travel to the UK? I also repeat my requests for you to provide the responses to my specific requests about this filming issue, both my email questions and the 9th Set of RFPs that I asked to be expedited. This entire issue is quiet serious, and we ask you to take this seriously and provide us with the requested information.

Thank you for your attention and consideration. Elaine

Elaine Charlson Bredehoft
Charlson Bredehoft Cohen & Brown, P.C.
11260 Roger Bacon Drive
Suite 201
Reston, VA 20190
(703) 318-6800
(703) 919-2735 (mobile)
(703) 318-6808 (fax)
www.cbcblaw.com

From: Chew, Benjamin G. <BChew@brownrudnick.com>
Sent: Wednesday, August 26, 2020 5:50 PM
To: Elaine Bredehoft <ebredehoft@charlsonbredehoft.com>
Subject: Depp deposition and location

Good evening, Elaine,

Without prejudice:

I am researching possible availability in late September prior to shooting of Beasts in October, likely via Webex or London

Hope to have more information by the time of our call Friday.

Best regards,

Ben

Sent from my iPhone

On Aug 26, 2020, at 1:12 PM, Elaine Bredehoft <ebredehoft@charlsonbredehoft.com> wrote.

External E-mail Use caution accessing links or attachments

Ben: I am trying to work through all of the potential solutions relating to your motion for continuance. Where is Mr Depp physically located currently? In other words, is he in L.A., Washington D.C., in some other country and if so, which one? What is Mr. Depp's availability to be deposed between now and October 1, 2020, and suggested locations for any/each dates? Thanks. Elaine

Elaine Charlson Bredehoft
Charlson Bredehoft Cohen & Brown, P.C.
11260 Roger Bacon Drive
Suite 201
Reston, VA 20190
(703) 318-6800
(703) 919-2735 (mobile)
(703) 318-6808 (fax)
www.cbcblaw.com<<http://www.cbcblaw.com>>

.....

The information contained in this electronic message may be legally privileged and confidential under applicable law, and is intended only for the use of the individual or entity named above. If the recipient of this message is not the above-named intended recipient, you are hereby notified that any dissemination, copy or disclosure of this communication is strictly prohibited. If you have received this communication in error, please notify Brown Rudnick LLP, (617) 856-8200 (if dialing from outside the US, 001-(617)-856-8200) and purge the communication immediately without making any copy or distribution.

To the extent Brown Rudnick is a "data controller" of the "personal data" (as each term is defined in the European General Data Protection Regulation) you have provided to us in this and other communications between us, please see our privacy statement and summary [here](#) which sets out details of the data controller, the personal data we have collected, the purposes for which we use it (including any legitimate interests on which we rely), the persons to whom we may transfer the data and how we intend to transfer it outside the European Economic Area.

.....

ATTACHMENT 11



WARNER BROS.
ENTERTAINMENT INC.

Wayne M. Smith
Senior Vice President
Corporate Legal

September 8, 2020

VIA EMAIL

Elaine Charlson Bredehoft
Charlson Bredehoft Cohen & Brown
11260 Roger Bacon Dr., Suite 201
Reston, VA 20190

Benjamin G. Chew
Brown Rudnick LLP
601 Thirteenth Street NW Suite 600
Washington, DC 20005

Re: *Depp v. Heard*

Dear Ms. Bredehoft and Mr. Chew:

Thank you both for taking the time to discuss with me the scheduling of various matters in your respective clients' lawsuit. As we have discussed, *Fantastic Beasts 3* began production this month in the United Kingdom, and we require Mr. Depp to be in the United Kingdom from September 17th through the anticipated end of production in mid-February, 2021. As to *Aquaman 2*, that film will not start production any earlier than May 31, 2021.

Very truly yours



Wayne M. Smith

WMS:wb

A Time Warner Company

4000 Warner Boulevard, Burbank, California 91522
(818) 954-6007 • Fax (818) 954-5434 • wayne.smith@warnerbros.com

ATTACHMENT 12

Elaine Bredehoft

From: Elaine Bredehoft
Sent: Wednesday, September 09, 2020 8:52 AM
To: Smith, Wayne, Chew, Benjamin G.
Cc: Eckerle, Glenn
Subject: RE: Depp v Heard

Thanks Wayne. Can you please send me the full film schedule and Mr. Depp's specific film schedule with the actual days filming? Thank you. Elaine

Elaine Charlson Bredehoft
Charlson Bredehoft Cohen & Brown, P.C.
11260 Roger Bacon Drive
Suite 201
Reston, VA 20190
(703) 318-6800
(703) 919-2735 (mobile)
(703) 318-6808 (fax)
www.cbcblaw.com

From: Smith, Wayne <Wayne.Smith@warnerbros.com>
Sent: Tuesday, September 08, 2020 5:29 PM
To: Elaine Bredehoft <ebredehoft@charlsonbredehoft.com>; Chew, Benjamin G <BChew@brownrudnick.com>
Cc: Eckerle, Glenn <Glenn.Eckerle@warnerbros.com>
Subject: Depp v. Heard

Dear Counsel,

Please see the attached correspondence regarding the referenced matter.

Regards,

Wayne M. Smith | SVP, Corporate Legal | Warner Bros. Entertainment Inc.
Bldg. 156, Room 5120 | 4000 Warner Blvd | Burbank, California 91522
☎ 818-954-6007 | ✉ wayne.smith@warnerbros.com

ATTACHMENT 13



SSIFF

Donostia Zinemaldia
Festival de San Sebastián
International Film Festival

Johnny Depp, Matt Dillon, Viggo Mortensen and Gina Gershon will attend San Sebastian Festival's 68th edition

British actor Joe Alwyn completes the official jury chaired by Luca Guadagnino

Elena Anaya, Candela Peña, Blanca Suárez, Paz Vega, Raúl Arévalo, Alejandro Sanz, Javier Cámara, Irene Escolar, Bárbara Lennie and Roberto Álamo are some of the Spanish cinema stars attendees currently confirmed

Thursday September 17th 2020

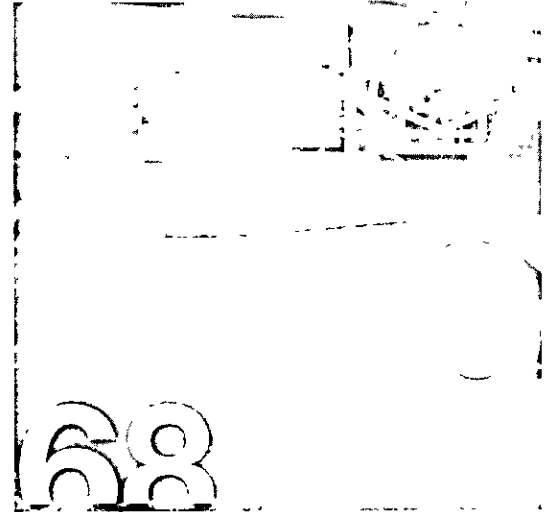
[Facebook](#) [Twitter](#) [Email](#) [Print](#)

San Sebastian Festival will have at its 68th edition a long list of guests who will visit the city to accompany the films and projects in which they participate. Among the personalities currently to have confirmed their presence are Hollywood stars, major figures from the field of European and Latin American cinema, and an extensive representation of the Spanish and Basque film industries.

Among other outstanding visits are those of Johnny Depp, producer of *Clock of Gold: A Few Rounds with Shane MacGowan* (competitive Official Selection), the documentary by Julien Temple on Shane MacGowan, leader of The Pogues. Its director will participate this year alongside another musical film showing in the Official Selection, *El gran Fellove* (Special Screening out of competition), directed by Matt Dillon, who returns to San Sebastian 14 years after receiving the Donostia Award. This accolade, the most important honorary award presented by the Festival, will be received on Thursday 24 by another actor turned director, Viggo Mortensen, who will show *Falling*, his debut behind the camera.

Woody Allen, the director of *Rifkin's Festival* (opening film of the Official Selection out of competition), will appear telematically from New York at the morning press conference, which will be attended in person by its female protagonists: the North American Gina Gershon and the Spanish actor Elena Anaya.

Among the reputed European moviemakers who will show their work in the competitive Official Selection are Danielle Arbid (*Passion simple*), accompanied by the actors Laetitia Dosch and Sergei Polunin, Šarūnas Bartas (*Sutemose / In The Dusk*), and Harry Macqueen (*Supernova*). Also worthy of note are first-timers such as the Georgian director Dea Kulumbegashvili (*Dasatskisi / Beginning*), who will also compete for the Golden Shell.



Furthermore, Luca Guadagnino will show the series *We Are Who We Are* as a Special Screening out of competition, as well as holding the position of president of an official jury rounded off with the fifth and last incorporation of British actor Joe Alwyn

Other sections will see the participation of the director and actor Suzanne Lindon and the actor Arnaud Valois (*16 printemps / Spring Blossom*, New Directors), the filmmaker Philippe Garrel and the actor Louise Chevillotte (*Le sel des larmes / The Salt of Tears*, Zabaltegi-Tabakalera), the director Adilkhan Yerzhanov (*Zheltaya koshka / Yellow Cat*, Zabaltegi-Tabakalera), the moviemaker and actor Maiwenn (*ADN / DNA*, Perlak), and the helmer Florian Zeller (*The Father*, Perlak) Furthermore, the Danish filmmaker Anna Sofie Hartmann will be the president of the Jury of Zabaltegi-Tabakalera

Latin American cinema will be represented by filmmakers including Pablo Aguero (*Akelarre*, Official Selection), Eduardo Crespo (*Nosotros nunca moriremos / We Will Never Die*, Official Selection), João Paulo Miranda Maria (*Casa de antiguidades / Memory House*, New Directors), Santiago Loza (*Edición ilimitada / Unlimited Edition*, Horizontes Latinos), Clarisa Navas (*Las mil y una / One in a Thousand*, Horizontes Latinos), Maite Alberdi (*El agente topo / The Mole Agent*, Perlak) and Michel Franco (*Nuevo orden / New Order*, Perlak) Other outstanding attendees are the director Jayro Bustamante, president of the Horizontes Award Jury, and the actor Mariana di Girolamo who, having shown *Ema* last year, returns together with the director Leonardo Medel (*La Verónica*, Horizontes Latinos)

THE ANTI-GENRE EXPERIMENT

Regarding attendees from the world of Spanish and Basque cinema, the actors Alex Brendemuhl and Amaia Aberasturi will accompany the director Pablo Aguero (*Akelarre*, Official Selection), while Rodrigo Sorogoyen, helmer of the series *Antidisturbios* (Official Selection out of competition), will return to the Festival at the head of an impressive cast including Alex García, Hovick Keuchkerian, Patrick Criado, Raúl Arévalo, Raul Prieto, Roberto Alamo and Vicky Luengo *Patria* (Special Screening) series will be represented by Aitor Gabilondo, its showrunner, and its cast –Jose Ramon Soroz, Mikel Laskurain, Jon Olivares, Susana Abaitua, Loreto Mauleon, Iñigo Aranbarry lead by Elena Irureta and Ane Gabarain The closing film, *El olvido que seremos* (*Forgotten We'll Be*, Official Selection out of competition), will be accompanied by its director, Fernando Trueba and the lead actor, Javier Cámara

Patricia López Arnaiz will participate twofold with the director David Perez Sañudo (*Ane / Ane Is Missing*, New Directors) and Imanol Rayo (*Hil Kanpaiak / Death Knell*, New Directors), alongside others who have also worked with the latter, such as Yon González and Eneko Sagardoy Pepón Nieto will accompany the film shot under the orders of Juan Cavestany (*Un efecto óptico / An Optical Illusion / Interval*, Zabaltegi-Tabakalera) and Carla Simón will go it alone to show her short film directed jointly with Dominga

Sotomayor (Correspondencia / *Correspondence*, Zabaltegi-Tabakalera) Other visitors to the city are the director Icíar Bollain and the actor Candela Peña (*La boda de Rosa / Rosa's Wedding*, Made in Spain), the actor Nerea Barros with the director Paula Cons (*La isla de las mentiras*, Made in Spain), and the co-director of *Hermanas* (Made in Spain), Diego Postigo, escorted by the actors Barbara Lennie and Irene Escolar The latter of the two will also appear with the director Eduard Cortés (*Dime quién soy*, Gala Movistar) in the company of the writer and screenwriter Julia Navarro and of the actor Oriol Pla

Within the RTVE Screenings, the director Cesc Gay will head the extensive cast featuring Alberto San Juan, Javier Cámara (*Sentimental*), while Nacho Álvarez will do the same with Ingrid García-Jonsson, Fernando Tejero and Natalia Millan (*Explota explota*) In addition, the helmer Carlos Sedes will take up his place at the head of an artistic cast including Blanca Suárez, Javier Rey, Carlos Cuevas, Guiomar Puerta, Maria Pedraza, Pablo Molinero and the musician Alejandro Sanz (*El verano que vivimos*, Charity Gala) For her part, Paz Vega will participate in the showing of *El lodo* (Other activities)

Gathering in the Zinemira section are figures including the musician Enrique Villarreal, lead figure of the documentary *El Drogas*, and Tanya Diane Ibar and Michael Ibar, wife and brother of Pablo Ibar, subject of the documentary series *El Estado contra Pablo Ibar / The Miramar Murders The State vs Pablo Ibar* In addition, Juan Mari and Elena Arzak head the list of chefs participating in the Culinary Zinema films and dinners, also attended, among others, by Ricard Camarena, Raul Balam and Carme Rusalleda

Thierry Frémaux, director of the Festival de Cannes, will participate tomorrow in the opening gala together with the San Sebastian Festival director, José Luis Rebordinos, who will give a speech in support of the French event and of other international festivals cancelled due to Covid-19

For her part, the filmmaker Isabel Coixet will also return to the city to receive the Spanish National Cinematography Prize, while the retinue accompanying the Tous Gala will include Tamara Falco, Eugenia Martínez de Irujo and Paula Echevarría, among other guests

JOE ALWYN IS THE MEMBER OF THE OFFICIAL JURY

British actor Joe Alwyn (1991) debuted in 2016 in the part lending its name to *Billy Lynn's Long Halftime Walk* (Ang Lee) The following year he starred alongside Jim Broadbent, Charlotte Rampling and Emily Mortimer in *The Sense of an Ending*, by Ritesh Batra, based on the book by Julian Barnes He also participated in *Operation Finale* (Chris Weitz, 2018), *Boy Erased* (Joel Edgerton, 2018) and *Mary Queen of Scots* (Josie Rourke, 2018), in the same year as he received the Chopard Trophy for best new actor of the year at Cannes After playing in *Harriet* (Kasi Lemmons, 2019), he appeared in the acclaimed *The Favourite* (2019), by Yorgos Lanthimos, alongside Emma Stone, Rachel Weisz and Olivia Colman Next year Alwyn will play in *The Last*

Letter from Your Lover (Augustine Frizzell), together with Felicity Jones and Shailene Woodley, and in the BBC Films production, *The Souvenir Part II*, with Tilda Swinton and Richard Ayoade



EUSKADI
BASQUE COUNTRY



rtve

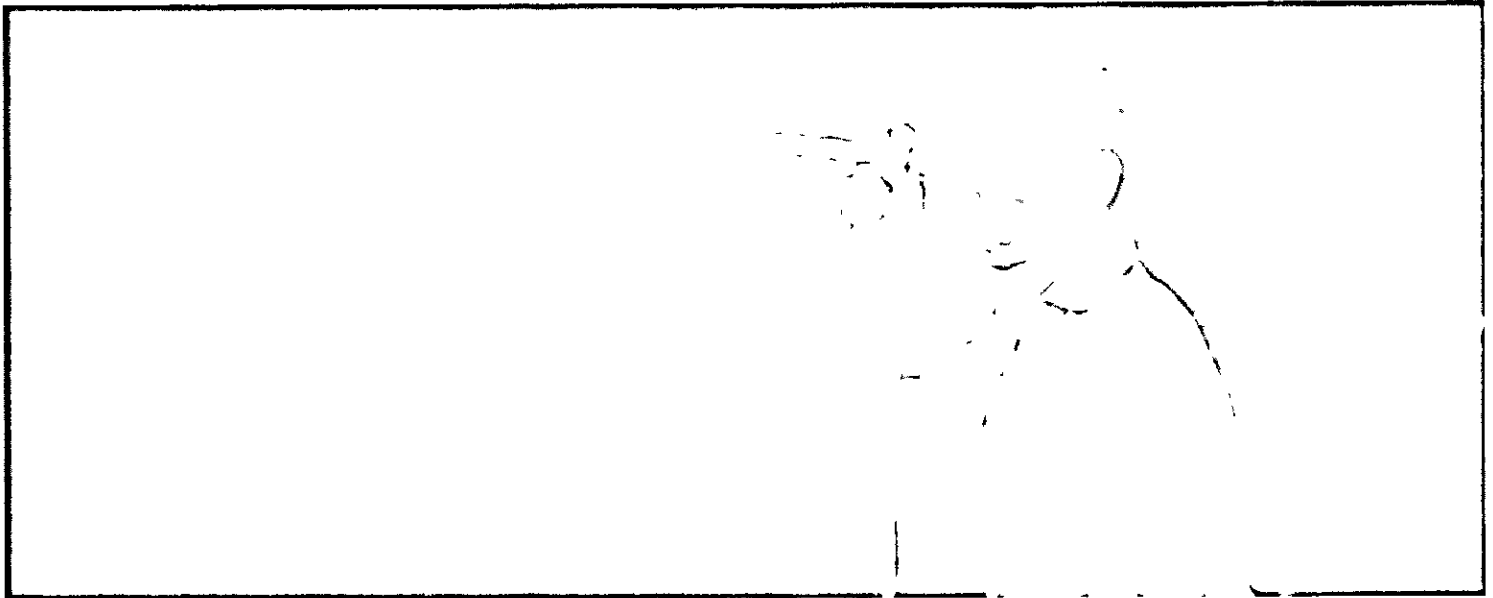


Posta kutxatila - Aptdo de correos 397
20080 Donostia / San Sebastian

T (+34) 943 481 212 E ssiff@sansebastianfestival.com
www.sansebastianfestival.com

© San Sebastian International Film Festival | Developed by [YoMontoProducciones](http://YoMontoProducciones.com)

ATTACHMENT 14



CROCK OF GOLD: A FEW ROUNDS WITH SHANE MCGOWAN

PROGRAMME 2020 (/EN/PROGRAMME/)

by *Julien Temple*

Gala Premieres

The Pogues were an Irish folk-punk band that landed a world hit in 1987 with the touching song "Fairytale of New York", which propelled them from playing in pubs to performing at the big concert venues. The songs of these catholic Irish stood for the independence of their homeland. Frontman Shane MacGowan, notorious for his excessive lifestyle, was particularly fond of making provocative, anti-British statements. Produced by Johnny Depp, this documentary by director Julien Temple looks back on the band's career and celebrates MacGowan as a nonconformist rebel. Depp himself sits down with his friend who, forever with a drink in his hand, talks to him about his career. Other Pogues band members and greats like Bono from U2 and Nick Cave also have their say. The film takes a bow to the career of punk poet MacGowan and makes you want to dust off your old Pogues records.

Time	Venue	
Fri. 02. Oct. 17:15*	Corso 1	TICKETS (HTTPS //WWW.STARTICKET.CH/EN/TICKETS/CROCK-OF-GOLD-A-FEW-ROUNDS-WITH-SHANE-MCGOWAN-20201002-1715-KINO-CORSO-1-ZURICH)
Fri. 02. Oct. 17:30**	Corso 2	TICKETS (HTTPS //WWW.STARTICKET.CH/EN/TICKETS/CROCK-OF-GOLD-A-FEW-ROUNDS-WITH-SHANE-MCGOWAN-20201002-1730-KINO-CORSO-2-ZURICH)

In attendance of

* Special Gala in attendance of Johnny Depp (Production), Victoria Mary Clarke (Associate producer and Mrs Shane MacGowan)

** Special Gala in attendance of Johnny Depp (Production), Victoria Mary Clarke (Associate producer and Mrs Shane MacGowan)

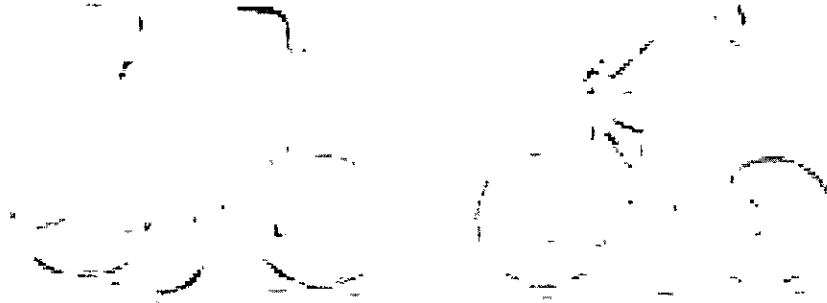
Genre: DOC: Arts & Culture

Country, Year: UK, Ireland, 2020

Runtime: 124 Min

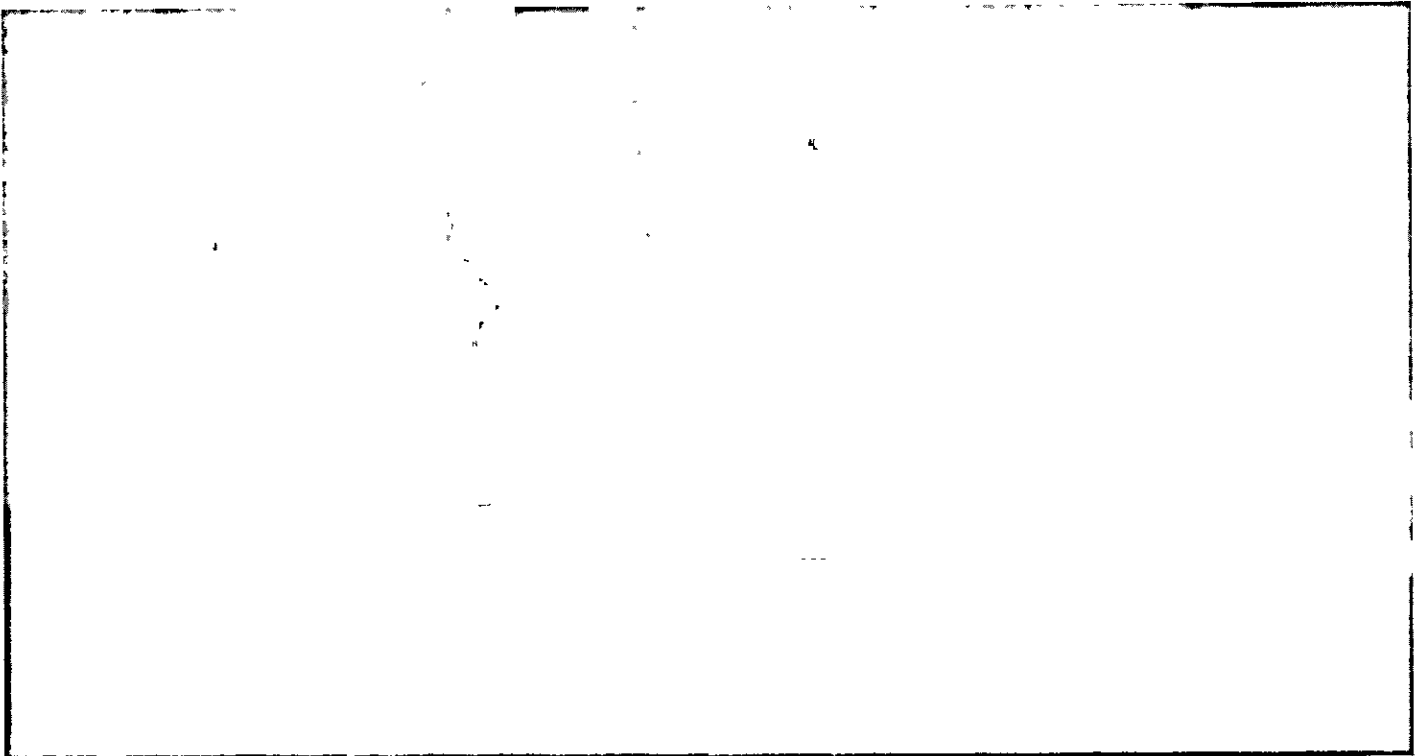
Languages: English

Subtitles: German



Here We Are

Gala Premieres (/en/archive/56877/)

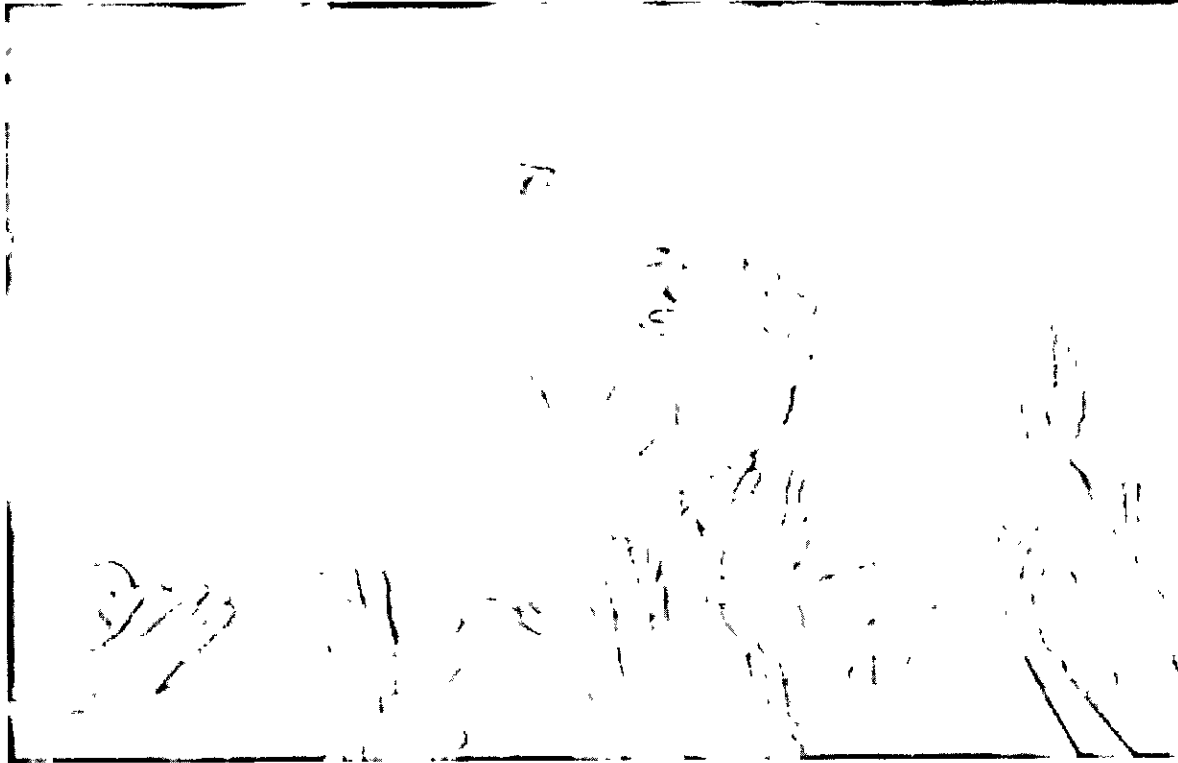


The Truffle Hunters

Gala Premieres (/en/archive/26728/)

Zurich Film Festival reveals 2020 line-up; Johnny Depp to attend

BY MICHAEL ROSSER | 10 SEPTEMBER 2020



SOURCE: NATALIA LACZYNSKA/LAVA FILMS

'SWEAT'

Switzerland's Zurich Film Festival (ZFF) has unveiled the full programme for its 2020 edition, which is set to go ahead as a physical event from September 24 to October 4.

Scroll down for list of competition titles

The 16th edition of the festival will comprise 165 films, of which 23 are world premieres and more than half of the competition titles are directed by women. ZFF also revealed that Oscar-winning UK actress Olivia Colman will receive an honorary award and Johnny Depp is set to attend the festival with a new documentary.

The feature film competition includes 14 titles that have proved festival highlights and award-winners throughout the year. These include Cannes label and Toronto title *Limbo*, from UK filmmaker Ben Sharrock, and Venice titles *Apples*, directed by Christos Nikou, *Shorta*, by Anders Ørholm and Frederik Louis Hviid, and *The Disciple*, by Chaitanya Tamhane.

The competition line-up also includes Yoon Dan-bi's *Moving On*, which won four prizes at Busan and the IFFR Bright Future award, *Never Rarely Sometimes Always*, which picked up a jury prize at Sundance and won director Eliza Hittman a Berlinale Silver Bear, and Cooper Raiff's *Shithouse*, which won the SXSW grand jury award.

Equally, the documentary competition includes acclaimed films such as Radu Ciorniciuc's *Acasa. My Home*, which has won several festival awards including the cinematography award at Sundance, and Nathan Grossman's Greta Thunberg film *I Am Greta*, which debuted at Venice and will screen at TIFF

ZFF's Focus competition, which selects first, second or third features from Switzerland, Germany or Austria, includes Visar Morina's *Exile*, which debuted at Sundance and recently won the top prize at Sarajevo

Stars lined up to attend

ZFF said that US actor Johnny Depp would attend the festival as the producer of documentary *Crock Of Gold A Few Rounds with Shane McGowan*, directed by Julien Temple, which will play in the Gala strand

Other stars set to attend include Juliette Binoche and Til Schweiger, who will both receive honorary Golden Eye awards and present their latest films respectively *How To Be A Good Wife* and *God, You're Such a Prick*

Colman, who stars in Netflix drama *The Crown* and won the best actress Oscar in 2019 for her performance in *The Favourite*, will also receive an honorary Golden Eye via a live stream *The Father*, in which she stars opposite Anthony Hopkins, will screen at the festival and director Florian Zeller will be in attendance

German actress Iris Berben was also set to receive an honorary award at the festival but accepted it today at the programme launch, as she will be filming in Greece and would need to quarantine in order to enter Zurich. The festival will host the world premiere of her latest feature, *Das Unwort*

**SOURCE: TIM HUGHES FOR ZURICH FILM FESTIVAL
IRIS BERBEN RECEIVES ZURICH FILM FESTIVAL GOLDEN EYE AWARD**

As previously announced, ZFF's Gala strand will include *Nomadland*, *The Courier*, Regina King's *One Night In Miami* and Venice opener *The Ties*

ZFF Competition Strands 2020

Feature Film Competition

Apples (Gre)

Dir Christos Nikou

Charter (Swe)

Dir Amanda Kernell

Gagarine (Fr)

Dir Fanny Liatard, Jérémy Trouilh

Limbo (UK)

Dir Ben Sharrock

Moving On (S Kor)

Dir Yoon Dan-bi

Never Rarely Sometimes Always (US-UK)

Dir Eliza Hittman

Preparations To Be Together For An Unknown Period Of Time (Hun)

Dir Lili Horvát

Shithouse (US)

Dir Cooper Raiff

Shorta (Den)

Dir Anders Ølholm, Frederik Louis Hviid

Identifying Features (Mex-Sp)

Dir. Fernanda Valadez

Slalom (Fr)

Dir Charlène Favier

Sweat (Pol-Swe)

Dir Magnus von Horn

The Disciple (Ind)

Dir Chaitanya Tamhane

Wildland (Den)

Dir Jeanette Nordahl

Documentary Competition

76 Days (US)

Dir Hao Wu, Weixi Chen, Anonymous

Acasa, My Home (Rom-Fin-Ger)

Dir. Radu Ciorniciuc

I Am Greta (Swe)

Dir Nathan Grossman

Jacinta (US)

Dir Jessica Earnshaw

King Of The Cruise (Neth)

Dir Sophie Dros

La Mami (Mex-Sp)

Dir Laura Herrero Garvin

Maya (UK)

Dir Jamshid Mojaddadi, Anson Hartford

Mayor (US)

Dir David Osit

Songs Of Repression (Den)

Dir Estephan Wagner, Marianne Hougen-Moraga

The Earth Is Blue As An Orange (Ukr)

Dir Iryna Tsilyk

The Painter And The Thief (Nor)

Dir Benjamin Ree

Time (US)

Dir. Garrett Bradley

Focus Competition

80.000 Schnitzel (Ger)

Dir. Hannah Schweier

Beyto (Swi)

Dir. Gitta Gsell

The Last Austrians

Dir. Lukas Pitscheider

Exile (Ger-Bel-Kos)

Dir. Visar Morina

Why Not You (Aus)

Dir. Evi Romen

Mirage (Swi)

Dir. Nina Stefanka

Not Me: A Journey With Not Vital (Swi)

Dir. Pascal Hofmann

Oeconomia (Ger)

Dir. Carmen Losmann

One Of These Days (Ger-US)

Dir. Bastian Gunther

Sami, Joe and I

Dir. Karin Heberlein

Grand Écart (Swi)

Dir. Christian Johannes Koch

Wood (Aus-Rom-Ger)

Dir. Monica Lazurean-Gorgan, Michaela Kirst, Ebba Sinzinger

- **How will the Covid-19 crisis transform the upcoming awards season?**

ATTACHMENT 15



New coronavirus: Mandatory quarantine for persons arriving in Switzerland

People arriving in Switzerland from certain countries and areas are required to go into quarantine. The list of these countries and areas was updated on 14 September 2020. A negative test result does not exempt you from the mandatory quarantine requirement.

- ✓ Who must go into quarantine?
- ✓ List of countries and areas
- ✓ What to do after entering Switzerland
- ✓ Information on quarantine
- ✓ Continued payment of wages or compensation for loss of earnings?
- ✓ Info sheet and poster to download
- ✓ Contact details for the cantonal authorities

Who must go into quarantine?

People who have spent time in a country or area with an increased risk of infection and then enter Switzerland must go into quarantine. The countries and areas affected are set down in a list. This list is regularly updated in line with the epidemiological situation.

The mandatory quarantine requirement is governed by the list valid at the moment of entry into Switzerland.

Check the list that is valid on your entry into Switzerland. Were you in one of the countries or areas on the list at any point in the 10 days before entry into Switzerland for more than 24 hours? If so, you are legally required to go into quarantine and report your arrival in Switzerland to the cantonal authorities. Follow the instructions under [What to do after entering Switzerland](#).

A negative test result does not exempt you from the mandatory quarantine requirement or shorten the quarantine period. This is because a negative test result does not rule out an infection with the new coronavirus. You will find the biological explanation for this on the [Frequently Asked Questions \(FAQs\)](#) page.

The mandatory quarantine requirement does not apply to transit passengers who have spent less than 24 hours in a country or area with an increased risk of infection. Further exceptions are set down in Article 4 of the [Covid-19 Ordinance on International Passenger Transport Measures](#).

List of countries and areas

The countries and areas with a high risk of infection are set down in the [Covid-19 Ordinance on International Passenger Transport Measures](#). This list is regularly updated.

No longer on the list since 14 September 2020: Ecuador, Faroe Islands, Guatemala, South Africa

The newly added countries and areas are written in bold.

Information regarding Spain: the Canary Islands are included on the list since 14 September, meaning that the whole of Spain is now on the list

List of countries and areas with a high risk of infection

- Albania
- Andorra
- Argentina
- Armenia
- Aruba
- The Bahamas
- Bahrain
- Belize
- Bolivia
- Bosnia and Herzegovina
- Brazil
- British Virgin Islands
- Cape Verde
- Chile
- Colombia
- Costa Rica
- Croatia
- Czech Republic
- Dominican Republic
- Gibraltar
- Guyana
- Honduras
- India
- Iraq
- Israel
- Kosovo
- Kuwait
- Lebanon
- Libya
- Maldives
- Malta
- Moldova
- Monaco
- Montenegro
- Namibia
- North Macedonia
- Occupied Palestinian Territory
- Panama
- Paraguay
- Peru
- Qatar
- Romania
- San Marino
- Sint Maarten
- Spain
- Suriname
- Trinidad and Tobago
- Turks and Caicos Islands
- Ukraine
- United Arab Emirates
- United States of America (including Puerto Rico, US Virgin Islands and Guam)

List of areas of neighbouring countries with a high risk of infection

France

- Region Centre-Val de Loire

- Region Corse
- Region Hauts-de-France
- Region Île de France
- Region Normandie
- Region Nouvelle-Aquitaine
- Region Occitanie
- Region Pays de la Loire
- Region Provence-Alpes-Côte d'Azur
- Overseas area French Guyana
- Overseas area Guadeloupe
- Overseas area French Polynesia
- Overseas area La Réunion
- Overseas area Martinique
- Overseas area Mayotte
- Overseas area Saint-Barthélemy
- Overseas area Saint-Martin

Austria

- Federal state Vienna

List valid upon arriving in Switzerland between 7 9 2020 and 13 9 2020

The newly added countries and areas are written in **bold** No longer on the list since 7 September 2020 Belgium, El Salvador, Eswatini (Swaziland), Kazakhstan, Kyrgyzstan, Luxembourg, Mexico, Oman

- Albania
- Andorra
- Argentina
- Armenia
- Aruba
- The Bahamas
- Bahrain
- Belize
- Bolivia
- Bosnia and Herzegovina
- Brazil
- Cape Verde
- Chile
- Colombia
- Costa Rica
- **Croatia**
- Dominican Republic
- Ecuador
- Faroe Islands
- **French Polynesia**
- Gibraltar
- Guam
- Guatemala
- **Guyana**
- Honduras
- India
- Iraq
- Israel
- Kosovo
- Kuwait
- **Lebanon**
- **Libya**
- Maldives
- Malta
- Moldova

- Monaco
- Montenegro
- Namibia
- North Macedonia
- Occupied Palestinian Territory
- Panama
- Paraguay
- Peru
- Qatar
- Romania
- **San Marino**
- Sint Maarten
- Spain including the Balearic Islands (without the Canary Islands)
- South Africa
- Suriname
- **Trinidad and Tobago**
- Turks and Caicos Islands
- **Ukraine**
- **United Arab Emirates**
- United States of America (including Puerto Rico and US Virgin Islands)

List valid upon arriving in Switzerland between 20 8 2020 and 6 9 2020

The newly added countries and areas are written in **bold** Removed from the list on 20 August 2020 Equatorial Guinea, São Tomé and Príncipe, Saudi Arabia, Serbia and Singapore.

- **Albania**
- **Andorra**
- Argentina
- Armenia
- **Aruba**
- The Bahamas
- Bahrain
- **Belgium**
- **Belize**
- Bolivia
- Bosnia and Herzegovina
- Brazil
- Cape Verde
- Chile
- Colombia
- Costa Rica
- Dominican Republic
- Ecuador
- El Salvador
- Eswatini (Swaziland)
- **Faroe Islands**
- **Gibraltar**
- **Guam**
- Guatemala
- Honduras
- **India**
- Iraq
- Israel
- Kazakhstan
- Kyrgyzstan
- Kosovo
- Kuwait
- Luxembourg

- Maldives
- Malta
- Mexico
- Moldova
- Monaco
- Montenegro
- Namibia
- North Macedonia
- Occupied Palestinian Territory
- Oman
- Panama
- Peru
- Qatar
- Romania
- Sint Maarten
- Spain including the Balearic Islands (without the Canary Islands)
- South Africa
- Suriname
- Turks and Caicos Islands
- United States of America (including Puerto Rico and US Virgin Islands)

List valid upon arriving in Switzerland between 8 8 2020 and 19 8 2020

The newly added countries and areas are written in bold. Removed from the list on 8 August 2020 Azerbaijan, Russia and the United Arab Emirates

- Argentina
- Armenia
- **The Bahamas**
- Bahrain
- Bolivia
- Bosnia and Herzegovina
- Brazil
- Cape Verde
- Chile
- Colombia
- Costa Rica
- Dominican Republic
- Ecuador
- El Salvador
- Eswatini (Swaziland)
- Equatorial Guinea
- Guatemala
- Honduras
- Iraq
- Israel
- Kazakhstan
- Kyrgyzstan
- Kosovo
- Kuwait
- Luxembourg
- Maldives
- Mexico
- Moldova
- Montenegro
- North Macedonia
- Occupied Palestinian Territory
- Oman
- Panama

- Peru
- Qatar
- Romania
- São Tomé and Príncipe
- Saudi Arabia
- Serbia
- Singapore
- Sint Maarten
- Spain (with the exception of the Balearic and Canary Islands)
- South Africa
- Suriname
- Turks and Caicos Islands
- United States of America (including Puerto Rico and US Virgin Islands)

Older lists can be found in the corresponding version of the “COVID-19 Ordinance on International Passenger Transport Measures”. Access to all versions of this ordinance can be gained in the classified compilation [↗](#) (listed on the right-hand side in a box).

What to do after entering Switzerland

- Upon arrival, go immediately to your home or to other suitable accommodation (e.g. a hotel or holiday apartment). On the way there, keep a minimum distance of 1.5 metres from other people. If you are unable to maintain this distance, we recommend that you wear a mask. Avoid public transport if possible.
- Report your arrival to the [cantonal authority responsible](#) within two days. Follow the instructions of the cantonal authority.
- For 10 days after your arrival in Switzerland you must stay in your home or other suitable accommodation without going out. Avoid contact with other people and follow the [instructions on quarantine](#) (PDF, 182 kB, 12.09.2020) ([/dam/bag/en/dokumente/mt/k-und-i/aktuelle-ausbrueche-pandemien/2019-nCoV/merkblatt-selbstquarantaene.pdf](#) download [pdf/covid-19_instructions_quarantine.pdf](#)).

Anyone who fails to comply with the quarantine requirement or the duty to report to the authorities is committing an offence under the Epidemics Act [↗](#) (in German), which can be punished by a fine of up to CHF 10,000.

The document ‘Instructions on quarantine’ can be found in various languages on our website [Downloads in various languages](#) [↗](#).

Information on quarantine

Anyone who may have become infected with the new coronavirus must go into quarantine. If they fall ill they should avoid all contact with other people in order to prevent the spread of the virus. The quarantined person should stay at home or in some other suitable accommodation and not leave for any reason.

Who has to go into quarantine and how long must they stay there? What should you do if you are in quarantine and live with other people? This and other information can be found in the document [Instructions on quarantine](#) (PDF, 182 kB, 12.09.2020) ([/dam/bag/en/dokumente/mt/k-und-i/aktuelle-ausbrueche-pandemien/2019-nCoV/merkblatt-selbstquarantaene.pdf](#) download [pdf/covid-19_instructions_quarantine.pdf](#)).

Children

Children entering Switzerland from a country or area mentioned on the list must also spend 10 days in quarantine.

Continued payment of wages or compensation for loss of earnings?

A check must first be conducted to see whether your employer is obliged to continue paying wages under the terms of your employment contract. The specific assessment of whether your wages are still payable is performed by you and your employer. In the event of a dispute, the courts will probably have to decide.

There are two cases in which an employer is obliged to continue paying wages:

- If your employer sends you to work in a country or area with an increased risk of infection and you have to go into quarantine upon your return to Switzerland.

- If you can still work from home despite being in quarantine.

If you are unable to work on account of the quarantine imposed on persons arriving in Switzerland and do not receive wages from your employer, the following applies

- You will be entitled to **compensation for Covid-related loss of earnings** if you have to go into quarantine through no fault of your own. This is the case if, at the time of your departure, your destination was not included on the list of countries and areas with an increased risk of infection and, at the time of your departure, you could not know, based on an official announcement, that your destination would be included on this list during your trip
- You will thus have no right to compensation if, at the time of your departure, your destination was on the list of countries and areas with an increased risk of infection

Payment of compensation for loss of earnings due to the corona crisis is organised by the OASI compensation offices. You will find further information on the OASI/DI Information Centre website (in German [↗](#), French [↗](#), Italian [↗](#)) or on the website of the Federal Social Insurance Office (FSIO) (in German [↗](#), French [↗](#) and Italian [↗](#)).

Compliance monitoring

The cantonal authorities are responsible for enforcing and monitoring compliance with the quarantine measures, and they carry out spot checks. For this purpose, they receive contact details for people subject to quarantine who entered Switzerland. These contact details come from flights or bus services selected at random on a weekly basis.

Members of the same household who have not been abroad

Does someone in your household have to go into quarantine after entering the country? If so, avoid contact with the quarantined person according to the [📄](#) Instructions on quarantine (PDF, 182 kB, 12.09.2020) ([/dam/bag/en/dokumente/mt/k-und-i/aktuelle-ausbrueche-pandemien/2019-nCoV/merkblatt-selbstquarantaene.pdf](#) download [pdf/covid-19_instructions_quarantine.pdf](#)). If all household members follow this advice, you can continue to live your life as normal and do not have to go into quarantine yourself.

The rules on hygiene and social distancing [↗](#) also remain important in this situation.

Further information

You will also find information in the document with the [📄](#) FAQs on quarantine (PDF, 38 kB, 17.07.2020) ([/dam/bag/en/dokumente/mt/k-und-i/aktuelle-ausbrueche-pandemien/2019-nCoV/faq-quarantaene-reisende.pdf](#) download [pdf/200717_FAQ-Quarantaene_EN.pdf](#)) and on the Frequently Asked Questions (FAQs) [↗](#) page.

Infoline for persons entering Switzerland +41 58 464 44 88 (daily from 6am to 11pm).

Info sheet and poster to download

[📄](#) Covid-19 International Passenger Transport Measures (Info sheet A5) (PDF, 1 MB, 09.07.2020) ([/dam/bag/en/dokumente/mt/k-und-i/aktuelle-ausbrueche-pandemien/2019-nCoV/flyer-a5-covid-19-massnahmen-internationaler-personenverkehr.pdf](#) download [pdf/COVID-19_International%20Passenger%20Transport%20Measures_Info%20sheet%20A5.pdf](#))

[📄](#) Covid-19 International Passenger Transport Measures (Poster A3) (PDF, 1 MB, 09.07.2020) ([/dam/bag/en/dokumente/mt/k-und-i/aktuelle-ausbrueche-pandemien/2019-nCoV/plakat-a5-covid-19-massnahmen-internationaler-personenverkehr.pdf](#) download [pdf/COVID-19_International%20Passenger%20Transport%20Measures_Poster%20A3.pdf](#))

Info sheet and poster in other languages [↗](#)

Contact details of the responsible cantonal authorities

Contact your local cantonal authority within two days of your arrival.

Canton	Contact details
Aargau	Online application form (In German) ↗
Appenzell Ausserrhoden	Online application form (In German) ↗
Appenzell Innerrhoden	Homepage (In German) ↗
Basel-Landschaft	Homepage (In German) ↗
Basel-Stadt	Homepage (In German) ↗
Bern	Online application form (In German) ↗
Fribourg	Homepage (In German) ↗
Geneva	Online application form (In French) ↗
Glarus	+41 55 646 61 40
Graubünden	Online application form (In German) ↗
Jura	+41 32 420 99 00 retour_voyage@jura.ch <small>(mailto:retour_voyage@jura.ch)</small> Online application form (In French) ↗
Lucerne	Homepage (In German) ↗
Neuchâtel	+41 32 889 11 00 Homepage (In French) ↗
Nidwalden	Homepage (In German) ↗
Obwalden	Online application form (In German) ↗ covid19@ow.ch (mailto:covid19@ow.ch)
St. Gallen	Online application form (In German) ↗
Schaffhausen	+41 52 632 70 01
Schwyz	Homepage (In German) ↗
Solethurn	Homepage (In German) ↗
Thurgau	+41 58 345 34 40 Homepage (In German) ↗
Ticino	Online application form ↗
Principality of Liechtenstein	Homepage (In German) ↗

Canton	Contact details
Uri	+41 41 874 34 33 Online application form (In German) ↗
Valais	+41 58 433 01 44 contact.covid19@psvalais.ch (mailto: contact.covid19@psvalais.ch) Online application form (In German) ↗
Vaud	Online application form (in French) ↗
Zug	+41 41 728 39 09 Online application form (In German) ↗
Zurich	Online application form ↗
Principality of Liechtenstein	Homepage (in German) ↗

Last modification 18 09 2020

Contact

We are unable to respond to enquiries related to COVID-19 in writing.

Please refer instead to our webpages, which are continuously updated

Under [Contacts and links](#) ([/bag/en/home/krankheiten/ausbrueche-epidemien-pandemien/aktuelle-ausbrueche-epidemien/novel-cov/faq-kontakte-downloads/kontakte-neues-coronavirus.html](https://www.bag.admin.ch/content/bag/en/home/krankheiten/ausbrueche-epidemien-pandemien/aktuelle-ausbrueche-epidemien/novel-cov/faq-kontakte-downloads/kontakte-neues-coronavirus.html)) you will find contact information for the FOPH, other federal agencies and the cantons.

T... [+41 58 464 44 88](tel:+41584644488)

<https://www.bag.admin.ch/content/bag/en/home/krankheiten/ausbrueche-epidemien-pandemien/aktuelle-ausbrueche-epidemien/novel-cov/empfehlungen-fuer-reisende/quarantaene-einreisende.html>

1. Home (<https://www.gov.uk/>)
2. Transport (<https://www.gov.uk/transport>)
3. Aviation (<https://www.gov.uk/transport/aviation>)
4. Aviation passenger experience (<https://www.gov.uk/transport/aviation-passenger-experience>)

Guidance

Coronavirus (COVID-19): travel corridors

List of countries, territories and regions from where you can travel to England and may not have to self-isolate.

Published 3 July 2020

Last updated 19 September 2020 — see all updates

From

Department for Transport (<https://www.gov.uk/government/organisations/department-for-transport>)

Applies to

England (see guidance for Wales (<https://gov.wales/exemptions-self-isolation-coronavirus-covid-19.html>), Scotland (<https://www.gov.scot/publications/coronavirus-covid-19-public-health-checks-at-borders/pages/exemptions/>), and Northern Ireland (<https://www.nidirect.gov.uk/articles/coronavirus-covid-19-countries-and-territories-exemptions>))

Contents

- Stay up to date
- Countries, territories and regions on the travel corridor list
- Updates to the travel corridor list
- Travel corridor exemption rules
- Arrival in the UK – passenger locator form
- Travelling abroad from the UK – foreign travel advice
- If you have coronavirus symptoms

Stay up to date

Countries, territories and regions can be taken off or added to this travel corridor list at any time

Sign up to get an email alert (<https://www.gov.uk/email-signup/?topic=/transport/aviation-passenger-experience>) whenever this page is updated

Countries, territories and regions on the travel corridor list

You may not have to self-isolate if you are travelling from one of the countries, territories or regions listed below. You will still need to complete the passenger locator form (<https://www.gov.uk/provide-journey-contact-details-before-travel-uk>) before you enter the **UK**

You will need to self-isolate if you visited or made a transit stop in a country, territory or region that is not on the list in the 14 days before you arrive in England

- Akrotiri and Dhekelia
- Anguilla (<https://www.gov.uk/foreign-travel-advice/anguilla>)
- Antigua and Barbuda (<https://www.gov.uk/foreign-travel-advice/antigua-and-barbuda>)
- Australia (<https://www.gov.uk/foreign-travel-advice/australia>)
- the Azores
- Barbados (<https://www.gov.uk/foreign-travel-advice/barbados>)
- Bermuda (<https://www.gov.uk/foreign-travel-advice/bermuda>)
- Bonaire, St Eustatius and Saba (<https://www.gov.uk/foreign-travel-advice/bonaire-st-eustatius-saba>)
- British Antarctic Territory (<https://www.gov.uk/foreign-travel-advice/british-antarctic-territory>)
- British Indian Ocean Territory
- British Virgin Islands (<https://www.gov.uk/foreign-travel-advice/british-virgin-islands>)
- Brunei (<https://www.gov.uk/foreign-travel-advice/brunei>)
- Cayman Islands (<https://www.gov.uk/foreign-travel-advice/cayman-islands>)

- the Channel Islands
- Cuba (<https://www.gov.uk/foreign-travel-advice/cuba>)
- Curaçao (<https://www.gov.uk/foreign-travel-advice/curacao>)
- Cyprus (<https://www.gov.uk/foreign-travel-advice/cyprus>)
- Denmark (<https://www.gov.uk/foreign-travel-advice/denmark>)
- Dominica (<https://www.gov.uk/foreign-travel-advice/dominica>)
- Estonia (<https://www.gov.uk/foreign-travel-advice/estonia>)
- Falkland Islands (<https://www.gov.uk/foreign-travel-advice/falkland-islands>)
- Faroe Islands (<https://www.gov.uk/foreign-travel-advice/denmark>)
- Fiji (<https://www.gov.uk/foreign-travel-advice/fiji>)
- Finland (<https://www.gov.uk/foreign-travel-advice/finland>)
- Gibraltar (<https://www.gov.uk/foreign-travel-advice/gibraltar>)
- Germany (<https://www.gov.uk/foreign-travel-advice/germany>)
- Greece (<https://www.gov.uk/foreign-travel-advice/greece>) (except the islands of Crete, Lesvos, Mykonos, Santonni, Serifos, Tinos and Zakynthos – if you arrive in England from any of these islands after 4am 9 September 2020 you will need to self-isolate (<https://www.gov.uk/government/publications/coronavirus-covid-19-how-to-self-isolate-when-you-travel-to-the-uk/coronavirus-covid-19-how-to-self-isolate-when-you-travel-to-the-uk>))
- Greenland (<https://www.gov.uk/foreign-travel-advice/denmark>)
- Grenada (<https://www.gov.uk/foreign-travel-advice/grenada>)
- Hong Kong (<https://www.gov.uk/foreign-travel-advice/hong-kong>)
- Iceland (<https://www.gov.uk/foreign-travel-advice/iceland>)
- Ireland (<https://www.gov.uk/foreign-travel-advice/ireland>)
- the Isle of Man
- Italy (<https://www.gov.uk/foreign-travel-advice/italy>)
- Japan (<https://www.gov.uk/foreign-travel-advice/japan>)
- Latvia (<https://www.gov.uk/foreign-travel-advice/latvia>)
- Liechtenstein (<https://www.gov.uk/foreign-travel-advice/liechtenstein>)
- Lithuania (<https://www.gov.uk/foreign-travel-advice/lithuania>)
- Macao (Macau) (<https://www.gov.uk/foreign-travel-advice/macao>)
- Madeira
- Malaysia (<https://www.gov.uk/foreign-travel-advice/malaysia>)
- Mauritius (<https://www.gov.uk/foreign-travel-advice/mauritius>)
- Montserrat (<https://www.gov.uk/foreign-travel-advice/montserrat>)
- New Caledonia (<https://www.gov.uk/foreign-travel-advice/new-caledonia>)
- New Zealand (<https://www.gov.uk/foreign-travel-advice/new-zealand>)
- Norway (<https://www.gov.uk/foreign-travel-advice/norway>)
- Pitcairn, Henderson, Ducie and Oeno Islands (<https://www.gov.uk/foreign-travel-advice/pitcairn-island>)
- Poland (<https://www.gov.uk/foreign-travel-advice/poland>)
- San Marino (<https://www.gov.uk/foreign-travel-advice/san-marino>)
- Seychelles (<https://www.gov.uk/foreign-travel-advice/seychelles>)
- Singapore (<https://www.gov.uk/foreign-travel-advice/singapore>) (if you arrived in England from Singapore before 4am 19 September 2020 you will need to self-isolate (<https://www.gov.uk/government/publications/coronavirus-covid-19-how-to-self-isolate-when-you-travel-to-the-uk/coronavirus-covid-19-how-to-self-isolate-when-you-travel-to-the-uk>))
- Slovakia (<https://www.gov.uk/foreign-travel-advice/slovakia>)
- South Korea (<https://www.gov.uk/foreign-travel-advice/south-korea>)
- South Georgia and the South Sandwich Islands (<https://www.gov.uk/foreign-travel-advice/south-georgia-and-south-sandwich-islands>)
- St Barthélemy (<https://www.gov.uk/foreign-travel-advice/st-martin-and-st-barthelemy>)
- St Helena, Ascension and Tristan da Cunha (<https://www.gov.uk/foreign-travel-advice/st-helena-ascension-and-tristan-da-cunha>)
- St Kitts and Nevis (<https://www.gov.uk/foreign-travel-advice/st-kitts-and-nevis>)
- St Lucia (<https://www.gov.uk/foreign-travel-advice/st-lucia>)
- St Pierre and Miquelon (<https://www.gov.uk/foreign-travel-advice/st-pierre-and-miquelon>)
- St Vincent and the Grenadines (<https://www.gov.uk/foreign-travel-advice/st-vincent-and-the-grenadines>)
- Sweden (<https://www.gov.uk/foreign-travel-advice/sweden>) (if you arrived in England from Sweden before 4am 12 September 2020 you will need to self-isolate (<https://www.gov.uk/government/publications/coronavirus-covid-19-how-to-self-isolate-when-you-travel-to-the-uk/coronavirus-covid-19-how-to-self-isolate-when-you-travel-to-the-uk>))
- Taiwan (<https://www.gov.uk/foreign-travel-advice/taiwan>)

- Thailand (<https://www.gov.uk/foreign-travel-advice/thailand>) (if you arrived in England from Thailand before 4am 19 September 2020 you will need to self-isolate (<https://www.gov.uk/government/publications/coronavirus-covid-19-how-to-self-isolate-when-you-travel-to-the-uk/coronavirus-covid-19-how-to-self-isolate-when-you-travel-to-the-uk>))
- Turkey (<https://www.gov.uk/foreign-travel-advice/turkey>)
- Vatican City State (<https://www.gov.uk/foreign-travel-advice/italy>)
- Vietnam (<https://www.gov.uk/foreign-travel-advice/vietnam>)

Updates to the travel corridor list

We will keep the conditions in these countries, territories and regions under review. If they worsen we will reintroduce self-isolation requirements.

Countries, territories or regions removed from the travel corridor list

Guadeloupe (<https://www.gov.uk/foreign-travel-advice/guadeloupe>) and Slovenia (<https://www.gov.uk/foreign-travel-advice/slovenia>) were removed from the travel corridor list at 4am, Saturday 19 September 2020.

If you arrive in England from Guadeloupe or Slovenia after 4am 19 September, you will need to self-isolate (<https://www.gov.uk/government/publications/coronavirus-covid-19-how-to-self-isolate-when-you-travel-to-the-uk/coronavirus-covid-19-how-to-self-isolate-when-you-travel-to-the-uk>).

If you arrived in England from Guadeloupe or Slovenia before 4am 19 September, you may not need to self-isolate. Read the rules about when you need to self-isolate and for how long (<https://www.gov.uk/guidance/coronavirus-covid-19-travel-corridors#exemption-rules>).

The following countries, territories and regions were removed from the exempt list at 4am Saturday 12 September 2020.

- French Polynesia (<https://www.gov.uk/foreign-travel-advice/french-polynesia>)
 - Hungary (<https://www.gov.uk/foreign-travel-advice/hungary>)
 - Portugal (<https://www.gov.uk/foreign-travel-advice/portugal>) (except the Azores and Madeira)
 - Réunion (<https://www.gov.uk/foreign-travel-advice/reunion>)
-

If you arrive in England from French Polynesia, Hungary, Portugal or Réunion after 4am 12 September 2020, you will need to self-isolate (<https://www.gov.uk/government/publications/coronavirus-covid-19-how-to-self-isolate-when-you-travel-to-the-uk/coronavirus-covid-19-how-to-self-isolate-when-you-travel-to-the-uk>).

If you arrived in England from French Polynesia, Hungary, Portugal or Réunion before 4am 12 September 2020 you may not need to self-isolate. Read the rules about when you need to self-isolate and for how long (<https://www.gov.uk/guidance/coronavirus-covid-19-travel-corridors#exemption-rules>).

Arrivals from the Azores and Madeira are not affected.

The following regions were removed from the exempt list at 4am Wednesday 9 September 2020.

- Crete
 - Lesbos
 - Mykonos
 - Santorini
 - Serifos
 - Tinos
 - Zakynthos
-

If you arrive in England from these Greek islands after 4am 9 September 2020, you will need to self-isolate (<https://www.gov.uk/government/publications/coronavirus-covid-19-how-to-self-isolate-when-you-travel-to-the-uk/coronavirus-covid-19-how-to-self-isolate-when-you-travel-to-the-uk>).

If you arrived in England from these Greek islands before 4am 9 September 2020 you may not need to self-isolate. Read the rules about when you need to self-isolate and for how long (<https://www.gov.uk/guidance/coronavirus-covid-19-travel-corridors#exemption-rules>).

Arrivals from other regions of Greece (<https://www.gov.uk/foreign-travel-advice/greece>) are not affected.

Countries or territories added to the travel corridor list

Singapore (<https://www.gov.uk/foreign-travel-advice/singapore>) and Thailand (<https://www.gov.uk/foreign-travel-advice/thailand>) were added to the travel corridor list at 4am, Saturday 19 September 2020.

If you arrive in England from Singapore or Thailand after 4am 19 September 2020 you may not need to self-isolate. Read the rules about when you need to self-isolate and for how long (<https://www.gov.uk/guidance/coronavirus-covid-19-travel-corridors#exemption-rules>).

If you arrived in England from Singapore or Thailand before 4am 19 September 2020, you will need to self-isolate (<https://www.gov.uk/government/publications/coronavirus-covid-19-how-to-self-isolate-when-you-travel-to-the-uk/coronavirus-covid-19-how-to-self-isolate-when-you-travel-to-the-uk>)

Sweden (<https://www.gov.uk/foreign-travel-advice/sweden>) was added to the exempt list at 4am Saturday 12 September 2020.

If you arrive in England from Sweden after 4am 12 September 2020 you may not need to self-isolate. Read the rules about when you need to self-isolate and for how long (<https://www.gov.uk/guidance/coronavirus-covid-19-travel-corridors#exemption-rules>).

If you arrived in England from Sweden before 4am 12 September 2020, you will need to self-isolate (<https://www.gov.uk/government/publications/coronavirus-covid-19-how-to-self-isolate-when-you-travel-to-the-uk/coronavirus-covid-19-how-to-self-isolate-when-you-travel-to-the-uk>)

Travel corridor exemption rules

Coronavirus (COVID-19) regulations mean that you must self-isolate for 14 days (<https://www.gov.uk/government/publications/coronavirus-covid-19-how-to-self-isolate-when-you-travel-to-the-uk/coronavirus-covid-19-how-to-self-isolate-when-you-travel-to-the-uk>) when you arrive in the UK.

This applies to UK residents and visitors to the UK.

You may not have to self-isolate when you arrive in England, if you are travelling from one of the countries, territories, regions or territories on the travel corridor list. That is because these are either

- covered by the travel corridor exemption
- within the common travel area - Ireland, the Channel Islands, the Isle of Man
- British overseas territories

You will need to self-isolate if you visited or made a transit stop in a country or territory that is not on the travel corridor list in the 14 days before you arrive in England.

This applies to all travel to England, by train, ferry, coach, air or any other route.

Example of when you would need to self-isolate

You are in a country that is not on the travel corridor list. You travel to a country, territory or region that is on the list and you stay there for 4 days from the day after you arrive. You then travel to England.

When you get to England, you will need to self-isolate for 10 days, not the usual 14 days. That is because you have spent 4 of the 14 days in a country, territory or region that is on the travel corridor list.

Transit stops

A transit stop is a stop where passengers can get on or off. It can apply to coaches, ferries, trains or flights. Your ticket should show if a stop is a transit stop.

If your journey involves a transit stop in a country, territory or region not on the travel corridor list, you will need to self-isolate when you arrive in England if

- new passengers get on
- you or other passengers get off the transport you are on and mix with other people, then get on again

You don't need to self-isolate beyond normal timescales if, during your transit stop in a non-exempt country, territory or region

- no new passengers get on

- no-one on-board gets off and mixes with people outside
- passengers get off but do not get back on

Private vehicles

You don't need to self-isolate if you travel through a non-exempt country, territory or region and you don't stop there

If you do make a stop, you don't need to self-isolate if

- no new people get into the vehicle
- no-one in the vehicle gets out, mixes with other people, and gets in again

You do need to self-isolate if you make a stop and

- new people get into the vehicle, or
- someone gets out of the vehicle, mixes with other people and gets in again

Arrival in the UK – passenger locator form

You must show proof of a completed passenger locator form at the UK border

This applies to people entering the UK from all countries, territories and regions

It applies to UK residents and visitors

You should complete the form before you enter the UK (<https://www.gov.uk/provide-journey-contact-details-before-travel-uk>).

You can complete it any time in the 48 hour period before you are due to arrive in the UK

Make sure you leave yourself enough time to complete it. If you do not complete the form before you arrive in the UK, it might take you longer to enter the UK

The form is an online form. You will need an internet connection and details of your journey to complete it.

Failure to complete the form is a criminal offence

There are a small number of people who don't have to complete the form because of the jobs they do (<https://www.gov.uk/government/publications/coronavirus-covid-19-travellers-exempt-from-uk-border-rules>). People on domestic flights and people arriving from Ireland, the Isle of Man or the Channel Islands also don't have to complete the form.

Travelling abroad from the UK – foreign travel advice

You will have to comply with coronavirus requirements in the country, territory or region you travel to. This may include self-isolating, providing your details to local authorities, testing for coronavirus, or even restrictions on entry

Before travelling abroad, you should check government advice on

- entry requirements for the country you're travelling to (<https://www.gov.uk/foreign-travel-advice>)
- foreign travel during coronavirus (<https://www.gov.uk/guidance/travel-advice-novel-coronavirus>)

Make sure you have appropriate travel insurance (<https://www.gov.uk/guidance/foreign-travel-insurance>) in case you have unexpected costs.

If you have coronavirus symptoms

Do not travel if you have coronavirus symptoms (<https://www.nhs.uk/conditions/coronavirus-covid-19/symptoms>).

Tell a member of the staff or crew if you develop symptoms while travelling

Published 3 July 2020

Last updated 19 September 2020 + show all updates

1 19 September 2020

Singapore and Thailand added to the England travel corridor list at 4am Saturday 19 September 2020 Guadeloupe and Slovenia removed from the list at 4am Saturday 19 September.

2. 17 September 2020

Singapore and Thailand to be added to the England travel corridor list at 4am Saturday 19 September 2020 Guadeloupe and Slovenia to be removed from the list at 4am Saturday 19 September.

- 3 12 September 2020
French Polynesia, Hungary, Portugal and Réunion removed from the travel corridors list at 4am Saturday 12 September 2020. Sweden added to the list at 4am Saturday 12 September.
- 4 10 September 2020
French Polynesia, Hungary, Portugal and Réunion to be removed from the travel corridors list at 4am Saturday 12 September 2020. Sweden to be added to the list at 4am Saturday 12 September.
5. 9 September 2020
Crete, Lesvos, Mykonos, Santorini, Serifos, Tinos and Zakynthos removed from the travel corridor list at 4am Wednesday 9 September 2020.
- 6 7 September 2020
Crete, Lesvos, Mykonos, Santorini, Serifos, Tinos and Zakynthos to be removed from the travel corridor list at 4am Wednesday 9 September 2020
7. 29 August 2020
Czech Republic, Jamaica and Switzerland removed from the travel corridor list at 4am Saturday 29 August 2020 Cuba added to the list at 4am Saturday 29 August
- 8 27 August 2020
Czech Republic, Jamaica and Switzerland to be removed from the exempt list for arrivals from 4am, Saturday, 29 August 2020.
- 9 22 August 2020
Austria, Croatia and Trinidad and Tobago removed from the travel corridor list at 4am Saturday 22 August. Portugal added to the list at 4am Saturday 22 August
- 10 20 August 2020
Austria, Croatia and Trinidad and Tobago to be removed from the travel corridor list at 4am Saturday 22 August. Portugal to be added to the list at 4am Saturday 22 August.
11. 15 August 2020
France, the Netherlands, Monaco, Malta, Turks and Caicos Islands and Aruba removed from the exempt list.
- 12 13 August 2020
France, the Netherlands, Monaco, Malta, Turks and Caicos Islands and Aruba to be removed from the exempt list for arrivals from 4am Saturday 15 August 2020
13. 11 August 2020
Brunei and Malaysia added to list.
- 14 7 August 2020
Andorra, The Bahamas and Belgium will be removed from the exempt list for arrivals at 4am, 8 August 2020.
15. 30 July 2020
Luxembourg removed from the exempt list for arrivals from 31 July 2020
- 16 28 July 2020
Estonia, Latvia, Slovakia, Slovenia and St Vincent and the Grenadines added to the exempt list
17. 25 July 2020
Spain removed from the exempt list for arrivals from 26 July 2020
18. 10 July 2020
Arrivals from Serbia to England removed from the exempt list
19. 8 July 2020
More information on transit stops, passengers arriving in England before 10 July 2020 and British overseas territories
- 20 3 July 2020
First published

Related content

- Provide your journey and contact details before you travel to the UK (<https://www.gov.uk/provide-journey-contact-details-before-travel-uk>)
- Coronavirus (COVID-19) countries and territories exempt from advice against 'all but essential' international travel (<https://www.gov.uk/guidance/coronavirus-covid-19-countries-and-territories-exempt-from-advice-against-all-but-essential-international-travel>)
- Travel advice coronavirus (COVID-19) (<https://www.gov.uk/guidance/travel-advice-novel-coronavirus>)
- Coronavirus (COVID-19) jobs that qualify for travel exemptions (<https://www.gov.uk/government/publications/coronavirus-covid-19-travellers-exempt-from-uk-border-rules>)
- Coronavirus (COVID-19) guidance and support (<https://www.gov.uk/coronavirus>)
- + 2 more
- Entering the UK (<https://www.gov.uk/uk-border-control>) and Provide your journey and contact details before you travel to the UK (<https://www.gov.uk/provide-journey-contact-details-before-travel-uk>)

Detailed guidance

- Coronavirus (COVID-19) safer air travel for passengers (<https://www.gov.uk/guidance/coronavirus-covid-19-safer-air-travel-guidance-for-passengers>)
- Coronavirus (COVID-19) safer travel guidance for passengers (<https://www.gov.uk/guidance/coronavirus-covid-19-safer-travel-guidance-for-passengers>)
- Coronavirus (COVID-19) countries and territories exempt from advice against 'all but essential' international travel (<https://www.gov.uk/guidance/coronavirus-covid-19-countries-and-territories-exempt-from-advice-against-all-but-essential-international-travel>)

- [Travel advice coronavirus \(COVID-19\) \(https //www gov uk/guidance/travel-advice-novel-coronavirus\)](https://www.gov.uk/guidance/travel-advice-novel-coronavirus)

Collection

- [Coronavirus \(COVID-19\) transport and travel guidance \(https //www gov uk/government/collections/coronavirus-covid-19-transport-and-travel-guidance\)](https://www.gov.uk/government/collections/coronavirus-covid-19-transport-and-travel-guidance)

Explore the topic

- [Aviation passenger experience \(https //www gov uk/transport/aviation-passenger-experience\)](https://www.gov.uk/transport/aviation-passenger-experience)
- [UK sea passengers \(https //www gov uk/transport/uk-sea-passengers\)](https://www.gov.uk/transport/uk-sea-passengers)
- [Rail \(https //www gov uk/transport/rail\)](https://www.gov.uk/transport/rail)
- [Driving and transport in the UK during coronavirus \(https //www gov uk/coronavirus-taxi/driving-and-transport-in-the-uk\)](https://www.gov.uk/coronavirus-taxi/driving-and-transport-in-the-uk)
- [International travel, immigration and repatriation during coronavirus \(https //www gov uk/coronavirus-taxi/international-travel-immigration-repatriation\)](https://www.gov.uk/coronavirus-taxi/international-travel-immigration-repatriation)