

In her responses to Mr. Depp's Fourth Requests for Production,¹ Ms. Heard has taken positions that are entirely indefensible, in an improper attempt to stonewall basic discovery. For instance, Ms. Heard asserted blanket objections to requests that merely ask for *communications regarding her own claims to have been violently abused by Mr. Depp—the central issue in this case*. The deficiencies in Ms. Heard's responses include the following: (1) Ms. Heard asserted blanket objections to clearly appropriate requests; (2) she included improper limiting language that will drastically and impermissibly narrow the scope of any production; and (3) she has produced no documents. Mr. Depp respectfully requests that the Court order Ms. Heard to provide supplemental responses without objections; remove her improper limiting language; and immediately produce documents. Mr. Depp also requests that Ms. Heard be sanctioned.

I. Ms. Heard Improperly Limits The Scope Of Documents To Be Produced In Response To RFP Nos. 9, 11-14, 16, 18, 20, 22, 24, 26, 28, and 29-33

In response to Mr. Depp's RFP Nos. 9, 11, 12, 13, 14, 16, 18, 20, 22, 24, 26, 28, 29, 30, 31, 32, and 33, Ms. Heard agreed to produce documents, but improperly limited the scope by stating that she would only "produce non-privileged documents in response to this Request **relevant to the statements at issue.**" (Emphasis added). In meet and confer discussions, Ms. Heard appeared to take the position that she only needs to produce documents that specifically relate to the three alleged statements by Mr. Depp's personal attorney, Adam Waldman, that form the basis of the remaining portion of her surviving Second Counterclaim for defamation. Thus, for example, in response to RFP No. 9, which seeks documents and communications "that evidence or reflect the impact of any and all public statements by Adam Waldman on [Ms. Heard's] reputation and or career," Ms. Heard evidently intends to withhold any documents that do not specifically relate to one of the three statements that survived Mr. Depp's Plea in Bar.

¹ Mr. Depp's Fourth RFPs are attached hereto as Exhibit 1. Ms. Heard's responses to the Fourth RFPs are attached as Exhibit 2. A meet and confer email regarding Ms. Heard's responses is attached as Exhibit 3.

In short, Ms. Heard is attempting to withhold highly relevant documents. For instance, a hypothetical document discussing the truth or falsity of an earlier statement by Mr. Waldman about Ms. Heard, or its effect on Ms. Heard's reputation, might be withheld on the specious grounds that it does not specifically relate to one of the three specific statements that survived Mr. Depp's Plea in Bar. But such a document could nonetheless be highly relevant to issues such as the truth or falsity of Mr. Waldman's later statements. Similarly, such a document could be critically relevant to a damages analysis, to show that any alleged damages to Ms. Heard's reputation were actually attributable to earlier statements that are now time-barred. The scope of discovery in Virginia is broad, and Ms. Heard may not withhold documents relevant to the subject of this action, based on her unilateral determination that they do not specifically relate to one of the three surviving statements in her Counterclaim. Va. R. Sup. Ct. 4:1(a).

II. Improper Limiting Language In Response To RFP Nos. 2, 18, and 19

RFP No. 2 seeks documents reflecting acting projects for which Ms. Heard was rejected, from 2010 to present. This is essential to analyzing Ms. Heard's \$100 million Counterclaim, which is based on Ms. Heard's contention that a handful of tweets by Adam Waldman caused \$100 million in damages to her career. Ms. Heard only agreed to produce documents dated *after April 8, 2020*, apparently based on the date of Mr. Waldman's alleged statements. That is not a reasonable position. To assess Ms. Heard's claimed \$100 million in damages, Mr. Depp must assess Ms. Heard's plausible income and career trajectory over a period of time. The state of Ms. Heard's career prior to April 8, 2020 is relevant to evaluating the impact, if any, of any tweets by Mr. Waldman. If Ms. Heard was frequently rejected for acting jobs prior to April 8, 2020, that would undermine any claim that subsequent rejections are attributable to Mr. Waldman's tweets. Indeed, no damages analysis can be conducted without such information.

RFP No. 18 seeks drafts of Ms. Heard's op-ed in the *Washington Post*, which forms the basis of Mr. Depp's Complaint for defamation. Ms. Heard's response limits the scope of production to "non-privileged" drafts. But Ms. Heard asserted the defense of advice of counsel in her fourth affirmative defense in her Answer ("Defendant relied upon counsel in writing and publishing the Op-Ed..."), which waives the privilege. Having asserted a defense that she relied on counsel in drafting the Op-ed, Ms. Heard cannot withhold drafts of the Op-ed on privilege grounds. *See, e.g., 7600 Limited Partnership v. QuesTech, Inc.*, 41 Va. Cir. 60 (1996).

RFP No. 19 seeks documents and communications regarding the op-ed in *The Washington Post* that forms the basis of Mr. Depp's Complaint in this action. The request clearly seeks directly relevant, discoverable information. Incredibly, Ms. Heard only agreed to produce drafts of the op-ed, but no communications or other documents.

III. Ms. Heard's Document Production Is Long Overdue

Ms. Heard's documents were due on January 19, 2021. Va. R. Sup. Ct. 4:9. No documents have been produced. The parties are in the midst of depositions, and the discovery cutoff is a bare two months away. Immediate production should be ordered.

IV. Ms. Heard Refuses Outright To Produce Any Documents In Response To RFP Nos. 3, 4, 5-8, 10, 15, 17, 19, 21, 23, 25, 27, and 34-42

Ms. Heard's objections to the RFPs set forth below should be overruled:

RFP Nos. 3 and 4 seek documents and contracts reflecting Ms. Heard's compensation from professional projects (i.e., acting jobs). Mr. Depp cannot properly evaluate and present evidence as to whether Ms. Heard's claim to have suffered \$100 million in damages is plausible without taking discovery as to her actual and projected income and career prospects.

RFP Nos. 5, 6, 7, 8, 10 seek documents reflecting the impact of the Depp/Heard relationship, the parties' divorce, the parties' subsequent litigation, and Ms. Heard's public abuse

allegations against Mr. Depp on Ms. Heard's reputation and career. By asserting a \$100 million Counterclaim for defamation, Ms. Heard put her reputation directly at issue. Mr. Depp is entitled to explore the relative impact of each of these events on Ms. Heard's career and reputation. For instance, if documents suggest that Ms. Heard's career was damaged more by the parties' widely publicized litigation than by a few tweets from Mr. Waldman, that fact would be relevant to challenge her claimed damages. Mr. Depp also contends that Ms. Heard manipulated the public and the press to falsely portray herself as a heroic survivor of abuse, in part to burnish her reputation and raise her profile, and is entitled to seek discovery to support that contention.

RFP No. 15 seeks documents related to the domestic violence restraining order sought by Ms. Heard when the parties divorced, *in which Ms. Heard publicly alleged in court filings that she had been abused by Mr. Depp*. While a subset of responsive documents might be privileged, any non-privileged documents that pertain to the restraining order or its contents are directly relevant. To state the obvious, *the truth or falsity of Ms. Heard's abuse allegations are at the heart of this case*. Documents and communications regarding the restraining order are reasonably calculated to lead to admissible evidence on that issue, and cannot be withheld.

RFP No. 17, 21, 23, 25, and 27 seek documents related to any contention that Ms. Heard suffered damages as a result of statements by Mr. Depp and Mr. Waldman that have now been eliminated as part of Ms. Heard's Counterclaim by Mr. Depp's Plea in Bar. However, the information sought by these RFPs remains relevant to a damages analysis. Mr. Depp is entitled to explore how much of Ms. Heard's \$100 million in alleged damages was claimed to be attributable to the five statements that are no longer part of Ms. Heard's Counterclaim. In other words, Mr. Depp is entitled to explore issues such as whether Ms. Heard's claimed damages are attributable, in whole or in part, to earlier statements as to which any claim is time-barred.


RFP No. 34 seeks documents and communications between Ms. Heard and film studios or similar entities regarding the alleged defamatory statements by Mr. Depp and Mr. Waldman in her Counterclaim, as well as the publicity surrounding this action and related litigation involving Mr. Depp. This, again, is relevant to Ms. Heard's alleged damages. Mr. Depp is entitled to explore whether these matters have had any actual impact on Ms. Heard's career, and whether any film studios have raised the drama in her personal life as a problem for her professionally, or cited any statements by Mr. Waldman (or cited this litigation) as a reason not to employ her.

RFP No. 35 seeks communications between Ms. Heard and her girlfriend, Bianca Butti regarding her claims of violent abuse by Mr. Depp. Such communications are relevant *to the central issue in this case*, and not privileged. Ms. Heard's objections are invalid on their face.

RFP No. 36 similarly seeks non-privileged communications between Ms. Heard and other persons regarding her claims of violent abuse against Mr. Depp. Once again, the relevance and appropriateness of this request could not be clearer. *Ms. Heard's claims of violent abuse are the central issue in this case*—any communications regarding her claims of abuse are relevant and discoverable. Quite frankly, any such documents should have been produced years ago. Astoundingly, Ms. Heard served blanket, boilerplate objections and refused to produce anything.

RFP Nos. 37-42 seek documents related to publicity Ms. Heard received from her (false) promise to donate the entirety of her divorce settlement from Mr. Depp to charity; documents sufficient to confirm the dates and amounts of any donations from the settlement proceeds that were actually made; and documents reflecting an anonymous donor who appears to have made donations on Ms. Heard's behalf. Ms. Heard has put these matters at issue, including by testifying that she could not have been financially motivated in accusing Mr. Depp of abuse, because she supposedly had kept none of the settlement proceeds.

Respectfully submitted,


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Counsel for Plaintiff John C. Depp, II

Dated: February 12, 2021

Exhibit 1

Facebook Messenger, WhatsApp, WeChat, Slack, Twitter, Skype, Instagram, Kik, Signal, Telegram, Viber, Threema, Dust, and Wickr.

3. The term “Communication” shall mean every written or oral manner of transmitting or receiving facts, ideas, information and opinions, including, without limitation: correspondence; telexes; telecopies; electronic mail; all attachments and enclosures thereto; text messages; computer tapes; discs; telephone tape recordings; recordings of any other type in any medium of written or oral communications; phone logs; message logs; and notes and memoranda of, referring to, or relating to, written or oral communications.

4. The term “Divorce Action” shall mean and refer to the dissolution proceeding entitled *In re the Marriage of Amber Laura Depp and John Christopher Depp II*, Los Angeles Superior Court Case No. BD641052.

5. “Document” and “Documents” are used in their broadest possible sense within the meaning under law and shall include by way of example, but not limitation, any written, printed, typed, spoken, computerized, or other graphic, phonic, or recorded matter of any kind or nature, however produced or reproduced, whether sent or received or neither, including drafts and copies bearing notations or marks not found on the original, including the following:

a. all contracts, agreements, representations, warranties, certificates, and opinions;

b. all letters or other forms of correspondence or communication, including electronic mail, facsimiles, envelopes, notes, memoranda, telegrams, cables, text messages, voice-mail messages, messages sent or received via social media platform, and messages (including reports, notes, notations, diary entries, and memoranda or other records of or relating to telephone conversations or conferences);

c. all memoranda, reports, financial statements, valuations, reports, notes, transcripts, tabulations, studies, analyses, evaluations, projections, work papers, notebooks, corporate or other records or copies thereof, lists, comparisons, questionnaires, surveys, charts, curves, graphs, summaries, extracts, statistical records, and compilations;

d. all desk and pocket calendars, appointment books, diaries, and logs;

e. all books, scrapbooks, articles, speeches, press releases, magazines, newspapers, booklets, circulars, bulletins, notices, instructions, brochures, and manuals;

f. all transcripts or records of meetings, discussions, or conferences, including tape recordings and minutes;

g. all photographs, microfilm, microfiche, phonographs, tapes or other records, punch cards, magnetic tapes, disks, data cells, drums, printouts, and other electronic, computerized, or other data compilations from which information can or may be obtained; and

h. all presentation materials, including computer generated or other electronic presentation pages, slides, overhead projections overlays, handouts, pamphlets, charts, posters, films, and videos.

6. The term “Mr. Depp” shall mean and refer to Plaintiff John C. Depp, II and all persons acting on his behalf, including but not limited to his agents, representatives, employees, and assigns.

7. The terms “Ms. Heard” and/or “You” or “Your” shall mean and refer to Defendant Amber Laura Heard and all Persons or entities acting on her behalf or under her control, including but not limited to her agents, representatives, employees, and assigns.

8. The term “Op-ed” shall mean the writing submitted by Ms. Heard in December 2018 for publication in the Washington Post, which is the subject, at least in part, of the Action.

9. The term “Person” shall mean any natural person or any business, legal, or government entity, or association.

10. The term “UK Action” shall mean and refer to the litigation between Mr. Depp and News Group Newspapers Limited, before the High Court of Justice, Queen’s Bench Division, the subject matter of which included, at least in part, the relationship between You and Mr. Depp.

11. In order to bring matters within the scope of these requests which might otherwise be construed to be outside their scope:

- a. “each” includes the word “every,” and “every” includes the word “each”;
- b. “any” includes the word “all,” and “all” includes the work “any”;
- c. “and,” “or” or “and/or” shall be construed conjunctively or disjunctively as necessary to make the request inclusive rather than exclusive;
- d. “all” shall also include “each of” and vice-versa; and
- e. the singular includes the plural and vice-versa.

12. All words, terms and phrases not specifically defined in these requests are to be given their normal and customary meaning in the context in which they are used herein.

Instructions

1. You are requested to produce all responsive documents in your possession, custody or control, wherever located, including, without limitation, those in the custody of your attorneys, agents, representatives and affiliates.

2. You shall provide a written response to each request herein.

3. The request shall be deemed to be continuing and you are required to promptly produce in the form of a supplemental document production any document requested herein that

is unavailable to you at the time of the production called for, but which becomes available to you or your attorneys, agents or representatives up to the conclusion of the proceedings herein. The date such additional documents came into your possession shall be specified, as well as the identity of the individuals who furnished such additional documents to the person preparing the response.

4. If any part of the following requests cannot be responded to in full, please respond to the extent possible, specifying the reason(s) for your inability to respond to the remainder and stating whatever information or knowledge you have concerning the portion to which you do not respond.

5. If an objection is made to any request contained herein, for each item or category objected to:

- a. State the specific ground for each objection;
- b. Identify each such document by giving its date, the name of each author (and each address or, if different), the name of each addressee (and each recipient, if different), and by giving any other information necessary to identify such document or part thereof; and
- c. Provide a description of the subject matter of each document or item.

Any ground not stated in an objection within the time frame provided by the relevant rule, or any extensions thereof, shall be waived.

6. If there are no documents in existence that are requested in a particular paragraph of this request, the Response must include a statement to that effect in writing.

7. Where any copy of any document whose production is sought herein, whether a draft or final version, is not identical to any copy thereof, by reason of alterations, notes, comments, initials, underscoring, indication of routing, or other material contained thereon or attached thereto, all such non-identical copies are to be produced separately.

8. If any document requested herein was formerly in your possession, custody or control (or that of your representative) and has been lost or destroyed or otherwise disposed of, you are requested to submit in lieu of any such document a written statement (a) describing in detail the nature of the document and its contents, including the document's date, subject matter, number of pages, and attachments and appendices, (b) identifying the person(s) who prepared or authored the document and, if applicable, the person(s) to whom the document was sent, distributed, shown, or explained, (c) specifying the date on which the document was prepared or transmitted, (d) specifying the date on which the document was lost or destroyed and, if destroyed, the conditions of and reasons for such destruction and the person(s) requesting and performing the destruction, and (e) where the document was maintained prior to its destruction.

9. Hard copies of all documents should be produced, in addition, copies of all documents available electronically should be delivered on a DVD or CD-ROM.

10. A request for any document shall be deemed to include a request for any and all transmittal sheets, cover letters, exhibits, enclosures, or attachments to such document, in addition to the document in its full and unexpurgated form.

11. Documents should be segregated according to the number of the request to which you are responding or produced in the manner they are kept in the ordinary course of business. Documents attached to each other should not be separated.

12. With the exception of any spreadsheets or database documents (e.g. documents created on software such as Microsoft Excel or Microsoft Access), which shall be produced in their native format, all electronically-stored information ("ESI") images shall be produced in one of the following formats: CCITT Group 4, Single-Paged TIFF files or Single-Paged JPG files with an Opticon image load file. A Concordance DAT metadata load file of all such ESI shall

also be provided with a link to the text files and shall contain extractable metadata, including at least the following: Beginning Bates, Ending Bates, Beginning Bates Attachment, Ending Bates Attachment, Custodian, File Name, From, Recipient, CC, BCC, Subject, Date Sent, Time Sent, Last Modified Date, Author, Title, Date Created, Time Created, Document Extension, Page Count, MD5Hash, Text Path and Native File Path. The text file format shall be Multi-Paged Document level text files. In addition, if documents are produced with slip-sheets, please include the native file, as well as links to the natives in the DAT file. Hard copy documents or any documents or things that do not qualify as ESI shall be scanned and produced in single page TIFF format with separate OCR files for each document, and shall be included in the load file for ESI.

13. If any privilege is claimed as to any communication requested or sought to be identified herein:

- a. State the nature of the privilege of the claim (i.e., attorney/client, work product, etc.),
- b. State the name of the party claiming privilege and the name of the attorney, if any, with respect to whom the privilege is claimed,
- c. State the basis for claiming the privilege as to the specific communication,
- d. Identify all persons present at any communication to which privilege is claimed and all persons to whom the subject matter of the communication was discussed or disclosed, and
- e. State the date of each such communication.

14. If any privilege is claimed as to any document requested or sought to be identified herein:

- a. State the nature of the privilege claimed (i.e., attorney/client, work product, etc.),
- b. State the basis for claiming the privilege as to the specific information or documents, and

c. State the date of such document, identify the type of document (i.e., letter, memo, etc.), set forth the subject matter thereof, identify each person who prepared it and each person (if any) who signed it, identify each person to whom it was directed, circulated or shown, and identify each person now in possession of the document.

15. For purposes of each document request, each such request for documents to be produced by you expressly includes documents in the possession of your attorneys, and any consultants or experts retained by you or your attorneys in connection with this action.

16. Produce all responsive documents as they are kept in the usual course of business or organize and label them to correspond with the categories in this request.

17. Plaintiff hereby reserves the right to expand or supplement all requests for information and documents set forth herein.

REQUESTS FOR PRODUCTION

1. Portions of Your state and federal tax returns from 2010 to present, sufficient to reflect Your gross income in each year from 2010 to present.

RESPONSE:

2. All Documents and Communications that evidence or reflect any film, movie, television, commercial, or other project from 2010 to present for which You were considered and rejected.

RESPONSE:

3. Documents sufficient to show Your total actual and/or anticipated compensation for each film, television, commercial, or other project with which You have been professionally involved from 2010 to present.

RESPONSE:

4. All contracts that memorialize Your professional involvement in any film, television, commercial, or other project from 2010 to present.

RESPONSE:

5. All Documents and Communications that evidence or reflect the impact of Your relationship with Mr. Depp on Your reputation and/or career.

RESPONSE:

6. All Documents and Communications that evidence or reflect the impact of the Divorce Action on Your reputation and/or career.

RESPONSE:

7. All Documents and Communications that evidence or reflect the impact of the U.K. Action on Your reputation and/or career.

RESPONSE:

8. All Documents and Communications that evidence or reflect the impact of Your allegations of abuse against Mr. Depp on Your reputation and/or career.

RESPONSE:

9. All Documents and Communications that evidence or reflect the impact of any and all public statements by Adam Waldman on Your reputation and/or career.

RESPONSE:

10. All Documents and Communications that evidence or reflect the impact of any and all public statements by Mr. Depp on Your reputation and/or career.

RESPONSE:

11. All Documents and Communications that refer, reflect, or relate to any contention that You have suffered damages as a result of any alleged statement by Mr. Depp or Adam Waldman.

RESPONSE:

12. All Documents and Communications that support or otherwise relate to Your allegation in paragraph 1 of Your Counterclaim in the above-captioned action that “Mr. Depp and/or his agents acting on his behalf have orchestrated a false and defamatory smear campaign against Ms. Heard.”

RESPONSE:

13. All Documents and Communications that support or otherwise relate to any contention that You have suffered damages in any form as a result of the “false and defamatory smear campaign” alleged in Your Counterclaim in the above-captioned action at paragraph 1.

RESPONSE:

14. All Documents and Communications that support or otherwise relate to Your allegation in paragraph 8 of Your Counterclaim in the above-captioned action that Mr. Depp and/or his agents “created, coordinated, controlled, and/or manipulated social media accounts created specifically for the purpose of targeting Ms. Heard[.]”

RESPONSE:

15. All Documents and Communications that refer, reflect, or relate to the “Domestic Violence Restraining Order” referenced in Your Counterclaim at paragraph 24.

RESPONSE:

16. All Documents and Communications that refer, reflect, or relate to the “GQ interview” referenced in Your Counterclaim at paragraphs 33 and 34, and attached as Exhibit A thereto.

RESPONSE:

17. All Documents and Communications that support or otherwise relate to any contention that You have suffered monetary or any other damages as a result of the “GQ

interview” referenced in Your Counterclaim at paragraphs 33 and 34, and attached as Exhibit A thereto.

RESPONSE:

18. All drafts of Your op-ed published in the *Washington Post*, which is referenced in Your Counterclaim at paragraph 37, and is the subject, at least in part, of the above-captioned action.

RESPONSE:

19. All Documents and Communications regarding Your op-ed published in the *Washington Post*, which is referenced in Your Counterclaim at paragraph 37, and is the subject, at least in part, of the above-captioned action.

RESPONSE:

20. All Documents and Communications that refer, reflect, or relate to the alleged statement by Adam Waldman on April 12, 2019, referenced in Your Counterclaim at paragraph 42, and attached as Exhibit B thereto.

RESPONSE:

21. All Documents and Communications that support or otherwise relate to any contention that You have suffered monetary or any other damages as a result of the alleged statement by Adam Waldman on April 12, 2019, referenced in Your Counterclaim at paragraph 42, and attached as Exhibit B thereto.

RESPONSE:

22. All Documents and Communications that refer, reflect, or relate to the alleged statement by Adam Waldman in June 2019, referenced in Your Counterclaim at paragraph 43, and attached as Exhibit C thereto.

RESPONSE:

23. All Documents and Communications that support or otherwise relate to any contention that You have suffered monetary or any other damages as a result of the alleged statement by Adam Waldman in June 2019, referenced in Your Counterclaim at paragraph 43, and attached as Exhibit C thereto.

RESPONSE:

24. All Documents and Communications that refer, reflect, or relate to the alleged statement by Adam Waldman in July 2019, referenced in Your Counterclaim at paragraph 44, and attached as Exhibit D thereto.

RESPONSE:

25. All Documents and Communications that support or otherwise relate to any contention that You have suffered monetary or any other damages as a result of the alleged statement by Adam Waldman in July 2019, referenced in Your Counterclaim at paragraph 44, and attached as Exhibit D thereto.

RESPONSE:

26. All Documents and Communications that refer, reflect, or relate to the alleged statement by Adam Waldman in July 2019, referenced in Your Counterclaim at paragraph 44, and attached as Exhibit E thereto.

RESPONSE:

27. All Documents and Communications that support or otherwise relate to any contention that You have suffered monetary or any other damages as a result of the alleged statement by Adam Waldman in July 2019, referenced in Your Counterclaim at paragraph 44, and attached as Exhibit E thereto.

RESPONSE:

28. All Documents and Communications that refer, reflect, or relate to the alleged statement by Adam Waldman in April 2020, referenced in Your Counterclaim at paragraph 45, and attached as Exhibit F thereto.

RESPONSE:

29. All Documents and Communications that support or otherwise relate to any contention that You have suffered monetary or any other damages as a result of the alleged statement by Adam Waldman in April 2020, referenced in Your Counterclaim at paragraph 45, and attached as Exhibit F thereto.

RESPONSE:

30. All Documents and Communications that refer, reflect, or relate to the alleged statement by Adam Waldman in April 2020, referenced in Your Counterclaim at paragraph 46, and attached as Exhibit G thereto.

RESPONSE:

31. All Documents and Communications that support or otherwise relate to any contention that You have suffered monetary or any other damages as a result of the alleged statement by Adam Waldman in April 2020, referenced in Your Counterclaim at paragraph 46, and attached as Exhibit G thereto.

RESPONSE:

32. All Documents and Communications that refer, reflect, or relate to the alleged statement by Adam Waldman in June 2020, referenced in Your Counterclaim at paragraph 47, and attached as Exhibit G thereto.

RESPONSE:

33. All Documents and Communications that support or otherwise relate to any contention that You have suffered monetary or any other damages as a result of the alleged statement by Adam Waldman in June 2020, referenced in Your Counterclaim at paragraph 47, and attached as Exhibit G thereto.

RESPONSE:

34. All Communications between You and/or Your agents, on the one hand, and any film studio or other Person or entity with which You are professionally involved, on the other hand, regarding any of the following topics: (1) Mr. Depp's claims against You in this Action; (2) the U.K. Action; (3) any of the allegedly defamatory statements by Mr. Depp and/or Adam Waldman referenced in Your Counterclaim and/or attached to Your Counterclaim as Exhibits A-H; and (4) any other public statements by Mr. Depp or Adam Waldman regarding You.

RESPONSE:

35. All Communications between You and Bianca Butti regarding Your allegations of violence or abuse against Mr. Depp.

RESPONSE:

36. All Communications between You and any other Person, other than Your attorneys, regarding Your allegations of violence or abuse against Mr. Depp.

RESPONSE:

37. All Documents and Communications that refer, reflect, or relate to the impact that Your purported donation of the proceeds of Your settlement with Mr. Depp to charity had on Your reputation and career.

RESPONSE:

38. All Documents and Communications that refer, reflect, or relate to any and all publicity arising from Your divorce from Mr. Depp, including but not limited to any publicity associated with Your public claims to have donated the entirety of the proceeds of the divorce settlement to charity.

RESPONSE:

39. All Documents and Communications that refer, reflect, or relate to any anonymous donations made on Your behalf on in Your name to the Children's Hospital, Los Angeles, from January 1, 2016 to present.

RESPONSE:

40. All Documents and Communications that refer, reflect, or relate to any anonymous donations made on Your behalf on in Your name to the American Civil Liberties Union, from January 1, 2016 to present.

RESPONSE:

41. All Documents and Communications that refer, reflect, or relate to any anonymous donations made on Your behalf from January 1, 2016 to present.

RESPONSE:

42. Documents sufficient to show whether and when You donated any portion of the settlement proceeds from the Divorce Action to charity, to the extent not previously produced.

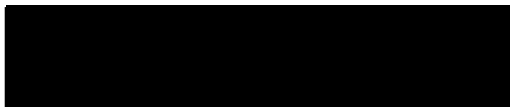
RESPONSE:

43. All Documents and Communications that evidence or reflect any damages alleged or sought by You in Your Counterclaim in this Action.

RESPONSE:

Dated: December 29, 2020

Respectfully submitted,



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CERTIFICATE OF SERVICE

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

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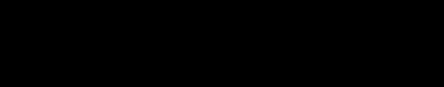

Benjamin G. Chew

Exhibit 2

VIRGINIA:

IN THE CIRCUIT COURT OF FAIRFAX COUNTY

JOHN C. DEPP, II,

Plaintiff and Counterclaim Defendant,

v.

AMBER LAURA HEARD,

Defendant and Counterclaim Plaintiff.

Civil Action No.: CL-2019-0002911

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

Pursuant to Rule 4:9 of the Rules of the Supreme Court of Virginia ("Rules"), Defendant and Counterclaim Plaintiff Amber Laura Heard, by and through her attorneys, submits these responses and objections (the "Responses") to Plaintiff and Counterclaim Defendant John C. Depp's Fourth Set of Requests for Production dated December 29, 2020 (the "Requests").

GENERAL OBJECTIONS

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

1. Defendant and Counterclaim Plaintiff objects to the Requests to the extent they are duplicative, cumulative, or seek information that has already been provided through other means of discovery. Defendant and Counterclaim Plaintiff will not reproduce documents already produced in discovery.

2. Defendant and Counterclaim Plaintiff objects to the Requests to the extent they are vague, ambiguous, overly broad, unduly burdensome, seek information not relevant to the claims or defenses of any party, or are not proportional to the needs of the case.

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

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

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

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

7. Defendant and Counterclaim Plaintiff objects to the Requests to the extent they require unreasonable measures to locate and produce responsive information or documents.

Defendant and Counterclaim Plaintiff will construe the requests to require a reasonable and diligent search of its reasonably-accessible files where it would reasonably expect to find information, documents, or things related to the requests.

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

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

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

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

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

OBJECTIONS TO DEFINITIONS

1. Defendant and Counterclaim Plaintiff objects to Definitions No. 3 on the grounds that it is overly broad, unduly burdensome, and seeks information not reasonably calculated to lead to the discovery of admissible evidence regarding the claims and defenses in this case, taking into account the needs of the case, the amount in controversy, limitations on the parties' resources, and the importance of the discovery in resolving the issues to the extent it seeks documents beyond Va. Sup. Ct. R. 4:9(a). Since a "Communication" is a form of a "Document," Defendant and Counterclaim Plaintiff will interpret the word "Communication" in accordance with the definition included in Va. Sup. Ct. R. 4:9(a).

2. Defendant and Counterclaim Plaintiff objects to Definition No. 5 on the grounds that it is overly broad, unduly burdensome, and seeks information not reasonably calculated to lead to the discovery of admissible evidence regarding the claims and defenses in this case, taking into account the needs of the case, the amount in controversy, limitations on the parties' resources, and the importance of the discovery in resolving the issues to the extent it seeks documents beyond Va. Sup. Ct. R. 4:9(a). Defendant and Counterclaim Plaintiff will interpret the word "Document" in accordance with the definition included in Va. Sup. Ct. R. 4:9(a).

3. Defendant and Counterclaim Plaintiff objects to Definition No. 11 as vague, ambiguous, and failing to define with particularity the information that it seeks as it defines words in a circular confusing manner, and is therefore unduly burdensome.

4. Defendant and Counterclaim Plaintiff objects to Definition No. 12 as vague, ambiguous, and failing to define with particularity the information that it seeks.

OBJECTIONS TO INSTRUCTIONS

1. Defendant and Counterclaim Plaintiff objects to Instruction No. 1 to the extent it exceeds the requirements of Va. Sup. Ct. R. 4:9(a), which only requires the production of documents “which are in the possession, custody, or control of the party upon whom the request is served,” and is therefore overly broad, unduly burdensome, and seeks information not reasonably calculated to lead to the discovery of admissible evidence regarding the claims and defenses in this case. Defendant and Counterclaim Plaintiff will produce documents in accordance with Va. Sup. Ct. R. 4:9(a).

2. Defendant and Counterclaim Plaintiff objects to the portion of Instruction No. 3 seeking “The date such additional documents came into your possession shall be specified, as well as the identity of the individuals who furnished such additional documents to the person preparing the response” because it exceeds the requirements of Va. Sup. Ct. R 4:9, and is therefore overly broad, unduly burdensome, and seeks information not reasonably calculated to lead to the discovery of admissible evidence regarding the claims and defenses in this case.

3. Defendant and Counterclaim Plaintiff objects to Instruction No. 4 because the request to “specify the reason(s) for your inability to respond to the remainder and stating whether information or knowledge you have concerning the portion to which you do not

respond” exceeds the requirements of Va. Sup. Ct. R 4:9, and is therefore overly broad, unduly burdensome, and seeks information not reasonably calculated to lead to the discovery of admissible evidence regarding the claims and defenses in this case.

4. Defendant and Counterclaim Plaintiff objects to Instruction No. 5(b) and (c) because the requests to identify each document in the manner requested and to “provide a description of the subject matter of each document or item” exceed the requirements of Va. Sup. Ct. R 4:9, and are therefore overly broad, unduly burdensome, and seek information not reasonably calculated to lead to the discovery of admissible evidence regarding the claims and defenses in this case.

5. Defendant and Counterclaim Plaintiff objects to Instruction No. 6 as unduly burdensome because the Plaintiff and Counterclaim Defendant has an ongoing duty under Va. Sup. Ct. R. 4:1(e) to supplement document production and responses when and where necessary, and this instruction is therefore overly broad and unduly burdensome.

6. Defendant and Counterclaim Plaintiff objects to Instruction No. 7 because it seeks documents and information protected by the attorney-client privilege, and on the grounds that this Request invades protected litigation work product and would require disclosure of core opinion work product and mental impression of counsel, which is prohibited by 4:1(b)(3) of the Rules of the Virginia Supreme Court.

7. Defendant and Counterclaim Plaintiff objects to Instruction No. 8 because it exceeds the requirements of Va. Sup. Ct. R 4:9, and is therefore overly broad, unduly burdensome, and seeks information not reasonably calculated to lead to the discovery of admissible evidence regarding the claims and defenses in this case.

8. Defendant and Counterclaim Plaintiff objects to Instruction No. 9 on the grounds

that it exceeds the requirements of Va. Sup. Ct. R 4:9, and is therefore overly broad, unduly burdensome, and seeks information not reasonably calculated to lead to the discovery of admissible evidence regarding the claims and defenses in this case. Defendant and Counterclaim Plaintiff will produce documents as they are kept in the usual course of business pursuant to Va. Sup. Ct. R. 4:9(b)(iii)(A).

9. Defendant and Counterclaim Plaintiff objects to Instruction No. 10 seeking “transmittal sheets and cover letters” on the grounds that such documents are overly broad, unduly burdensome, and seeks information not reasonably calculated to lead to the discovery of admissible evidence regarding the claims and defenses in this case. Defendant and Counterclaim Plaintiff further objects because this Instruction seeks information protected by the attorney-client privilege, and on the grounds that this Request invades protected litigation work product and would require disclosure of core opinion work product and mental impression of counsel, which is prohibited by 4:1(b)(3) of the Rules of the Virginia Supreme Court.

10. Defendant and Counterclaim Plaintiff objects to Instruction No. 11 on the grounds that it exceeds the requirements of Va. Sup. Ct. R 4:9, and is therefore overly broad, unduly burdensome, and seeks information not reasonably calculated to lead to the discovery of admissible evidence regarding the claims and defenses in this case. Defendant and Counterclaim Plaintiff will produce documents as they are kept in the usual course of business pursuant to Va. Sup. Ct. R. 4:9(b)(iii)(A).

11. Defendant and Counterclaim Plaintiff objects to Instruction No. 12 on the grounds that it exceeds the requirements of Va. Sup. Ct. R 4:9, and is therefore overly broad, unduly burdensome, and seeks information not reasonably calculated to lead to the discovery of admissible evidence regarding the claims and defenses in this case. Defendant and

Counterclaim Plaintiff will produce documents as they are kept in the usual course of business pursuant to Va. Sup. Ct. R. 4:9(b)(iii)(A). The Instruction is also ambiguous because it contradicts Instruction No. 9.

12. Defendant and Counterclaim Plaintiff objects to Instruction Nos. 13 and 14 on the grounds that they exceed the requirements of Va. Sup. Ct. R 4:9 and 4:1(b)(6), and are therefore overly broad, unduly burdensome, and seeks information not reasonably calculated to lead to the discovery of admissible evidence regarding the claims and defenses in this case.

13. Defendant and Counterclaim Plaintiff objects to Instruction No. 15 because it seeks information protected by the attorney-client privilege, and on the grounds that this Request invades protected litigation work product and would require disclosure of core opinion work product and mental impression of counsel, which is prohibited by 4:1(b)(3) of the Rules of the Virginia Supreme Court.

14. Defendant and Counterclaim Plaintiff objects to Instruction No. 16 on the grounds that it exceeds the requirements of Va. Sup. Ct. R 4:9, and is therefore overly broad, unduly burdensome, and seeks information not reasonably calculated to lead to the discovery of admissible evidence regarding the claims and defenses in this case. Defendant and Counterclaim Plaintiff will produce documents as they are kept in the usual course of business pursuant to Va. Sup. Ct. R. 4:9(b)(iii)(A). The Instruction is also cumulative and duplicative of earlier Instructions.

15. Defendant and Counterclaim Plaintiff objects to Instruction No. 17 as unduly burdensome by seeking to later “expand” these already-served Requests for Production of Documents.

REQUESTS FOR PRODUCTION

1. **Portions of Your state and federal tax returns from 2010 to present, sufficient to reflect Your gross income in each year from 2010 to present.**

OBJECTION: Defendant and Counterclaim Plaintiff objects to this Request seeking financial information on the grounds that it is vague, ambiguous, and fails to define with particularity the information that it seeks, and is overly broad, unduly burdensome, harassing, and seeks information not reasonably calculated to lead to the discovery of admissible evidence regarding the claims and defenses in this case, taking into account the needs of the case, the amount in controversy, limitations on the parties' resources, the importance of the discovery in resolving the issues, and critically the Court's prior rulings defining the scope of relevant discovery in this case quoted in detail below.

On July 24, 2020 the Court ruled that Request No. 14 of Ms. Heard's 2nd Request for Documents seeking "income from all sources from 2010 to the present" was overbroad because "those types of things aren't anything that would be helpful in this case," along with ruling that discovery seeking "outflow, what his expenses are and whether he spends more money than he makes" was overbroad and beyond the scope of relevant discovery in this case. The Court also ruled that Request 16 of Ms. Heard's 2nd Request for Documents seeking all transactions from January 1, 2010 to the present with a list of individuals was "overly broad" and beyond the scope of discovery in this case unless these individuals were "going to be potential witnesses" in the case.

On September 18, 2020 the Court ruled that Request Nos. 1-6 and 8 of Ms. Heard's 7th Requests for Documents and Request Nos. 1, 3, 5, and 7 of Ms. Heard's 7th Requests seeking financial related documents during the parties' marriage and related to the divorce case was

overbroad and beyond the scope of relevant discovery in this case because “its denied under the doctrine of enough is enough. You all have been through the divorce already. We’re not going to retry that divorce in this case.”

Also on September 18, 2020 the Court specifically defined the narrow scope of relevant tax-return discovery in this case as only requiring “the documents which show the gross income...The supporting documents are not to be produced,” and further Ordered that only “the amount of income” from the tax returns is relevant and that only involved “limited parts of [the tax return] that would show the income.” The Court reiterated this scope of tax-return discovery on November 20 when it further ruled that only the “return pages” of tax returns needed to be produced, and “the supplementary documents that are attached to” the returns were beyond the scope of relevant discovery in this case. Any other tax-related documents are therefore beyond the scope of relevant discovery in this case.

On November 20, 2020 the Court also ruled that Requests 1-5 of Ms. Heard’s 8th Requests for Documents seeking deposition transcripts, pleadings, discovery responses, and document production from four other specific litigations regarding disputes over Mr. Depp’s finances were “overly broad [and] burdensome” and beyond the scope of discovery in this case.

Defendant and Counterclaim Plaintiff further objects to the timeframe of this Request of 2010 to the present as overly broad, unduly burdensome, harassing, and seeks information not reasonably calculated to lead to the discovery of admissible evidence regarding the claims and defenses in this case, taking into account the needs of the case, the amount in controversy, limitations on the parties’ resources, the importance of the discovery in resolving the issues, and critically the Court’s prior rulings defining the scope of relevant discovery in this case.

RESPONSE: Subject to and without waiving the objections, Defendant and Counterclaim Plaintiff will produce non-privileged documents in response to this Request.

2. **All Documents and Communications that evidence or reflect any film, movie, television, commercial, or other project from 2010 to present for which You were considered and rejected.**

OBJECTION: Defendant and Counterclaim Plaintiff objects to this Request seeking financial information on the grounds that it is vague, ambiguous, and fails to define with particularity the information that it seeks, and is overly broad, unduly burdensome, harassing, and seeks information not reasonably calculated to lead to the discovery of admissible evidence regarding the claims and defenses in this case, taking into account the needs of the case, the amount in controversy, limitations on the parties' resources, the importance of the discovery in resolving the issues, and critically the Court's prior rulings defining the scope of relevant discovery in this case quoted in detail below.

On July 24, 2020 the Court ruled that Request No. 14 of Ms. Heard's 2nd Request for Documents seeking "income from all sources from 2010 to the present" was overbroad because "those types of things aren't anything that would be helpful in this case," along with ruling that discovery seeking "outflow, what his expenses are and whether he spends more money than he makes" was overbroad and beyond the scope of relevant discovery in this case. The Court also ruled that Request 16 of Ms. Heard's 2nd Request for Documents seeking all transactions from January 1, 2010 to the present with a list of individuals was "overly broad" and beyond the scope of discovery in this case unless these individuals were "going to be potential witnesses" in the case.

On September 18, 2020 the Court ruled that Request Nos. 1-6 and 8 of Ms. Heard's 7th Requests for Documents and Request Nos. 1, 3, 5, and 7 of Ms. Heard's 7th Requests seeking

financial related documents during the parties' marriage and related to the divorce case was overbroad and beyond the scope of relevant discovery in this case because "its denied under the doctrine of enough is enough. You all have been through the divorce already. We're not going to retry that divorce in this case."

Also on September 18, 2020 the Court specifically defined the narrow scope of relevant tax-return discovery in this case as only requiring "the documents which show the gross income...The supporting documents are not to be produced," and further Ordered that only "the amount of income" from the tax returns is relevant and that only involved "limited parts of [the tax return] that would show the income." The Court reiterated this scope of tax-return discovery on November 20 when it further ruled that only the "return pages" of tax returns needed to be produced, and "the supplementary documents that are attached to" the returns were beyond the scope of relevant discovery in this case. Any other tax-related documents are therefore beyond the scope of relevant discovery in this case.

On November 20, 2020 the Court also ruled that Requests 1-5 of Ms. Heard's 8th Requests for Documents seeking deposition transcripts, pleadings, discovery responses, and document production from four other specific litigations regarding disputes over Mr. Depp's finances were "overly broad [and] burdensome" and beyond the scope of discovery in this case.

Defendant and Counterclaim Plaintiff further objects to the timeframe of this Request of 2010 to the present as overly broad, unduly burdensome, harassing, and seeks information not reasonably calculated to lead to the discovery of admissible evidence regarding the claims and defenses in this case, taking into account the needs of the case, the amount in controversy, limitations on the parties' resources, the importance of the discovery in resolving the issues, and critically the Court's prior rulings defining the scope of relevant discovery in this case.

Defendant and Counterclaim Plaintiff further objects to this Request because it seeks information protected by the attorney-client privilege, and on the grounds that this Request invades protected litigation work product and would require disclosure of core opinion work product and mental impression of counsel, which is prohibited by 4:1(b)(3) of the Rules of the Virginia Supreme Court. Plaintiff and Counterclaim Defendant has not made the requisite showing under the Rules.

RESPONSE: Subject to and without waiving the objections, Defendant and Counterclaim Plaintiff has produced or will produce non-privileged documents in response to this Request from April 8, 2020.

- 3. Documents sufficient to show Your total actual and/or anticipated compensation for each film, television, commercial, or other project with which You have been professionally involved from 2010 to present.**

OBJECTION: Defendant and Counterclaim Plaintiff objects to this Request seeking financial information on the grounds that it is vague, ambiguous, and fails to define with particularity the information that it seeks, and is overly broad, unduly burdensome, harassing, and seeks information not reasonably calculated to lead to the discovery of admissible evidence regarding the claims and defenses in this case, taking into account the needs of the case, the amount in controversy, limitations on the parties' resources, the importance of the discovery in resolving the issues, and critically the Court's prior rulings defining the scope of relevant discovery in this case quoted in detail below.

On July 24, 2020 the Court ruled that Request No. 14 of Ms. Heard's 2nd Request for Documents seeking "income from all sources from 2010 to the present" was overbroad because "those types of things aren't anything that would be helpful in this case," along with ruling that discovery seeking "outflow, what his expenses are and whether he spends more money than he

makes” was overbroad and beyond the scope of relevant discovery in this case. The Court also ruled that Request 16 of Ms. Heard’s 2nd Request for Documents seeking all transactions from January 1, 2010 to the present with a list of individuals was “overly broad” and beyond the scope of discovery in this case unless these individuals were “going to be potential witnesses” in the case.

On September 18, 2020 the Court ruled that Request Nos. 1-6 and 8 of Ms. Heard’s 7th Requests for Documents and Request Nos. 1, 3, 5, and 7 of Ms. Heard’s 7th Requests seeking financial related documents during the parties’ marriage and related to the divorce case was overbroad and beyond the scope of relevant discovery in this case because “its denied under the doctrine of enough is enough. You all have been through the divorce already. We’re not going to retry that divorce in this case.”

Also on September 18, 2020 the Court specifically defined the narrow scope of relevant tax-return discovery in this case as only requiring “the documents which show the gross income...The supporting documents are not to be produced,” and further Ordered that only “the amount of income” from the tax returns is relevant and that only involved “limited parts of [the tax return] that would show the income.” The Court reiterated this scope of tax-return discovery on November 20 when it further ruled that only the “return pages” of tax returns needed to be produced, and “the supplementary documents that are attached to” the returns were beyond the scope of relevant discovery in this case. Any other tax-related documents are therefore beyond the scope of relevant discovery in this case.

On November 20, 2020 the Court also ruled that Requests 1-5 of Ms. Heard’s 8th Requests for Documents seeking deposition transcripts, pleadings, discovery responses, and

document production from four other specific litigations regarding disputes over Mr. Depp's finances were "overly broad [and] burdensome" and beyond the scope of discovery in this case.

Defendant and Counterclaim Plaintiff further objects to the timeframe of this Request of 2010 to the present as overly broad, unduly burdensome, harassing, and seeks information not reasonably calculated to lead to the discovery of admissible evidence regarding the claims and defenses in this case, taking into account the needs of the case, the amount in controversy, limitations on the parties' resources, the importance of the discovery in resolving the issues, and critically the Court's prior rulings defining the scope of relevant discovery in this case.

Defendant and Counterclaim Plaintiff further objects to this Request because it seeks information protected by the attorney-client privilege, and on the grounds that this Request invades protected litigation work product and would require disclosure of core opinion work product and mental impression of counsel, which is prohibited by 4:1(b)(3) of the Rules of the Virginia Supreme Court. Plaintiff and Counterclaim Defendant has not made the requisite showing under the Rules.

RESPONSE: Subject to and without waiving the objections, please refer to the Defendant and Counterclaim Plaintiff's response and document production to Request No. 1 of these 4th Requests for Production of Documents. Defendant and Counterclaim Plaintiff otherwise stands on her objections to this Request.

4. All contracts that memorialize Your professional involvement in any film, television, commercial, or other project from 2010 to present.

OBJECTION: Defendant and Counterclaim Plaintiff objects to this Request seeking financial information, including seeking documents "relating to" it, on the grounds that it is vague, ambiguous, and fails to define with particularity the information that it seeks, and is

overly broad, unduly burdensome, harassing, and seeks information not reasonably calculated to lead to the discovery of admissible evidence regarding the claims and defenses in this case, taking into account the needs of the case, the amount in controversy, limitations on the parties' resources, the importance of the discovery in resolving the issues, and critically the Court's prior rulings defining the scope of relevant discovery in this case quoted in detail below.

On July 24, 2020 the Court ruled that Request No. 14 of Ms. Heard's 2nd Request for Documents seeking "income from all sources from 2010 to the present" was overbroad because "those types of things aren't anything that would be helpful in this case," along with ruling that discovery seeking "outflow, what his expenses are and whether he spends more money than he makes" was overbroad and beyond the scope of relevant discovery in this case. The Court also ruled that Request 16 of Ms. Heard's 2nd Request for Documents seeking all transactions from January 1, 2010 to the present with a list of individuals was "overly broad" and beyond the scope of discovery in this case unless these individuals were "going to be potential witnesses" in the case.

On September 18, 2020 the Court ruled that Request Nos. 1-6 and 8 of Ms. Heard's 7th Requests for Documents and Request Nos. 1, 3, 5, and 7 of Ms. Heard's 7th Requests seeking financial related documents during the parties' marriage and related to the divorce case was overbroad and beyond the scope of relevant discovery in this case because "its denied under the doctrine of enough is enough. You all have been through the divorce already. We're not going to retry that divorce in this case."

Also on September 18, 2020 the Court specifically defined the narrow scope of relevant tax-return discovery in this case as only requiring "the documents which show the gross income...The supporting documents are not to be produced," and further Ordered that only "the

amount of income” from the tax returns is relevant and that only involved “limited parts of [the tax return] that would show the income.” The Court reiterated this scope of tax-return discovery on November 20 when it further ruled that only the “return pages” of tax returns needed to be produced, and “the supplementary documents that are attached to” the returns were beyond the scope of relevant discovery in this case. Any other tax-related documents are therefore beyond the scope of relevant discovery in this case.

On November 20, 2020 the Court also ruled that Requests 1-5 of Ms. Heard’s 8th Requests for Documents seeking deposition transcripts, pleadings, discovery responses, and document production from four other specific litigations regarding disputes over Mr. Depp’s finances were “overly broad [and] burdensome” and beyond the scope of discovery in this case.

Defendant and Counterclaim Plaintiff further objects to the timeframe of this Request of 2010 to the present as overly broad, unduly burdensome, harassing, and seeks information not reasonably calculated to lead to the discovery of admissible evidence regarding the claims and defenses in this case, taking into account the needs of the case, the amount in controversy, limitations on the parties’ resources, the importance of the discovery in resolving the issues, and critically the Court’s prior rulings defining the scope of relevant discovery in this case.

Defendant and Counterclaim Plaintiff further objects to this Request because it seeks information protected by the attorney-client privilege, and on the grounds that this Request invades protected litigation work product and would require disclosure of core opinion work product and mental impression of counsel, which is prohibited by 4:1(b)(3) of the Rules of the Virginia Supreme Court. Plaintiff and Counterclaim Defendant has not made the requisite showing under the Rules.

RESPONSE: Subject to and without waiving the objections, Defendant and Counterclaim Plaintiff stands on her objections to this Request.

5. All Documents and Communications that evidence or reflect the impact of Your relationship with Mr. Depp on Your reputation and/or career.

OBJECTION: Defendant and Counterclaim Plaintiff objects to this Request on the grounds that it is vague, ambiguous, and fails to define with particularity the information that it seeks, and is overly broad, unduly burdensome, harassing, and seeks information not reasonably calculated to lead to the discovery of admissible evidence regarding the claims and defenses in this case, taking into account the needs of the case, the amount in controversy, limitations on the parties' resources, the importance of the discovery in resolving the issues, and critically the Court's prior rulings defining the scope of relevant discovery in this case quoted in detail below.

On November 20, 2020 the Court ruled that Request No. 6 of Ms. Heard's 8th Document Requests seeking documents revealing the impact of other litigation on Mr. Depp's "reputation and career" as overly broad, burdensome, and unreasonably vague, and therefore holding that the subject was beyond the scope of discovery in this case.

Defendant and Counterclaim Plaintiff further objects to this Request seeking documents evidencing or reflecting "your relationship with Mr. Depp" on the grounds that it is vague, ambiguous, and fails to define with particularity the information that it seeks, and is overly broad, unduly burdensome, harassing, and seeks information not reasonably calculated to lead to the discovery of admissible evidence regarding the claims and defenses in this case, taking into account the needs of the case, the amount in controversy, limitations on the parties' resources, the importance of the discovery in resolving the issues, and critically the Court's prior rulings defining the scope of relevant discovery in this case quoted in detail below.

On December 18, 2020, the Court ruled that Request 51 of Mr. Depp's 3rd Requests for Documents seeking all communications between Ms. Heard and anyone relating to her relationship with Mr. Depp, claims of abuse or violence involving Mr. Depp, and injuries Ms. Heard contends she suffered as a result of Mr. Depp's conduct was overbroad, and therefore beyond the scope of discovery in this case. The Court also ruled that Request 52 of Mr. Depp's 3rd Requests for Documents seeking all documents and communications relating to Ms. Heard's "relationship with Mr. Depp" was also overbroad, and therefore beyond the scope of discovery in this case.

Defendant and Counterclaim Plaintiff further objects to this Request because it seeks information protected by the attorney-client privilege, and on the grounds that this Request invades protected litigation work product and would require disclosure of core opinion work product and mental impression of counsel, which is prohibited by 4:1(b)(3) of the Rules of the Virginia Supreme Court. Plaintiff and Counterclaim Defendant has not made the requisite showing under the Rules.

RESPONSE: Subject to and without waiving the objections, Defendant and Counterclaim Plaintiff stands on her objections to this Request.

6. All Documents and Communications that evidence or reflect the impact of the Divorce Action on Your reputation and/or career.

OBJECTION: Defendant and Counterclaim Plaintiff objects to this Request seeking financial information on the grounds that it is vague, ambiguous, and fails to define with particularity the information that it seeks, and is overly broad, unduly burdensome, harassing, and seeks information not reasonably calculated to lead to the discovery of admissible evidence regarding the claims and defenses in this case, taking into account the needs of the case, the

amount in controversy, limitations on the parties' resources, the importance of the discovery in resolving the issues, and critically the Court's prior rulings defining the scope of relevant discovery in this case quoted in detail below.

On July 24, 2020 the Court ruled that Request No. 14 of Ms. Heard's 2nd Request for Documents seeking "income from all sources from 2010 to the present" was overbroad because "those types of things aren't anything that would be helpful in this case," along with ruling that discovery seeking "outflow, what his expenses are and whether he spends more money than he makes" was overbroad and beyond the scope of relevant discovery in this case. The Court also ruled that Request 16 of Ms. Heard's 2nd Request for Documents seeking all transactions from January 1, 2010 to the present with a list of individuals was "overly broad" and beyond the scope of discovery in this case unless these individuals were "going to be potential witnesses" in the case.

On September 18, 2020 the Court ruled that Request Nos. 1-6 and 8 of Ms. Heard's 7th Requests for Documents and Request Nos. 1, 3, 5, and 7 of Ms. Heard's 7th Requests seeking financial related documents during the parties' marriage and related to the divorce case was overbroad and beyond the scope of relevant discovery in this case because "its denied under the doctrine of enough is enough. You all have been through the divorce already. We're not going to retry that divorce in this case."

Also on September 18, 2020 the Court specifically defined the narrow scope of relevant tax-return discovery in this case as only requiring "the documents which show the gross income...The supporting documents are not to be produced," and further Ordered that only "the amount of income" from the tax returns is relevant and that only involved "limited parts of [the tax return] that would show the income." The Court reiterated this scope of tax-return discovery

on November 20 when it further ruled that only the “return pages” of tax returns needed to be produced, and “the supplementary documents that are attached to” the returns were beyond the scope of relevant discovery in this case. Any other tax-related documents are therefore beyond the scope of relevant discovery in this case.

On November 20, 2020 the Court also ruled that Requests 1-5 of Ms. Heard’s 8th Requests for Documents seeking deposition transcripts, pleadings, discovery responses, and document production from four other specific litigations regarding disputes over Mr. Depp’s finances were “overly broad [and] burdensome” and beyond the scope of discovery in this case.

Defendant and Counterclaim Plaintiff further objects to this Request because it seeks information protected by the attorney-client privilege, and on the grounds that this Request invades protected litigation work product and would require disclosure of core opinion work product and mental impression of counsel, which is prohibited by 4:1(b)(3) of the Rules of the Virginia Supreme Court. Plaintiff and Counterclaim Defendant has not made the requisite showing under the Rules.

RESPONSE: Subject to and without waiving the objections, Defendant and Counterclaim Plaintiff stands on her objections to this Request.

7. All Documents and Communications that evidence or reflect the impact of the U.K. Action on Your reputation and/or career.

OBJECTION: Defendant and Counterclaim Plaintiff objects to this Request on the grounds that it is vague, ambiguous, and fails to define with particularity the information that it seeks, and is overly broad, unduly burdensome, harassing, and seeks information not reasonably calculated to lead to the discovery of admissible evidence regarding the claims and defenses in this case, taking into account the needs of the case, the amount in controversy, limitations on the

parties' resources, the importance of the discovery in resolving the issues, and critically the Court's prior rulings defining the scope of relevant discovery in this case quoted in detail below.

On November 20, 2020 the Court ruled that discovery seeking documents "sufficient to reflect the impact" of the UK litigation "on Mr. Depp's reputation and career" was overly broad, unduly burdensome, and unreasonably vague, and therefore beyond the scope of discovery in this case.

On December 18, 2020 the Court ruled that Request No. 23 of Mr. Depp's 1st Requests for Document and Request 50 of Mr. Depp's 3rd Requests for Documents seeking all documents and communications between Ms. Heard and The Sun/NGN was overbroad, and therefore beyond the scope of relevant discovery in this case. The Court also ruled that Request No. 51 of Mr. Depp's 3rd Requests for Documents seeking all documents and communications relating to the UK Action was also overbroad, and therefore beyond the scope of relevant discovery in this case.

Defendant and Counterclaim Plaintiff further objects to this Request to the extent it seeks financial information, including seeking documents "relating to" it, on the grounds that it is vague, ambiguous, and fails to define with particularity the information that it seeks, and is overly broad, unduly burdensome, harassing, and seeks information not reasonably calculated to lead to the discovery of admissible evidence regarding the claims and defenses in this case, taking into account the needs of the case, the amount in controversy, limitations on the parties' resources, the importance of the discovery in resolving the issues, and critically the Court's prior rulings defining the scope of relevant discovery in this case quoted in detail below.

On July 24, 2020 the Court ruled that Request No. 14 of Ms. Heard's 2nd Request for Documents seeking "income from all sources from 2010 to the present" was overbroad because

“those types of things aren’t anything that would be helpful in this case,” along with ruling that discovery seeking “outflow, what his expenses are and whether he spends more money than he makes” was overbroad and beyond the scope of relevant discovery in this case. The Court also ruled that Request 16 of Ms. Heard’s 2nd Request for Documents seeking all transactions from January 1, 2010 to the present with a list of individuals was “overly broad” and beyond the scope of discovery in this case unless these individuals were “going to be potential witnesses” in the case.

On September 18, 2020 the Court ruled that Request Nos. 1-6 and 8 of Ms. Heard’s 7th Requests for Documents and Request Nos. 1, 3, 5, and 7 of Ms. Heard’s 7th Requests seeking financial related documents during the parties’ marriage and related to the divorce case was overbroad and beyond the scope of relevant discovery in this case because “its denied under the doctrine of enough is enough. You all have been through the divorce already. We’re not going to retry that divorce in this case.”

Also on September 18, 2020 the Court specifically defined the narrow scope of relevant tax-return discovery in this case as only requiring “the documents which show the gross income...The supporting documents are not to be produced,” and further Ordered that only “the amount of income” from the tax returns is relevant and that only involved “limited parts of [the tax return] that would show the income.” The Court reiterated this scope of tax-return discovery on November 20 when it further ruled that only the “return pages” of tax returns needed to be produced, and “the supplementary documents that are attached to” the returns were beyond the scope of relevant discovery in this case. Any other tax-related documents are therefore beyond the scope of relevant discovery in this case.

On November 20, 2020 the Court also ruled that Requests 1-5 of Ms. Heard's 8th Requests for Documents seeking deposition transcripts, pleadings, discovery responses, and document production from four other specific litigations regarding disputes over Mr. Depp's finances were "overly broad [and] burdensome" and beyond the scope of discovery in this case.

Defendant and Counterclaim Plaintiff further objects to this Request because it seeks information protected by the attorney-client privilege, and on the grounds that this Request invades protected litigation work product and would require disclosure of core opinion work product and mental impression of counsel, which is prohibited by 4:1(b)(3) of the Rules of the Virginia Supreme Court. Plaintiff and Counterclaim Defendant has not made the requisite showing under the Rules.

RESPONSE: Subject to and without waiving the objections, Defendant and Counterclaim Plaintiff stands on her objections to this Request.

8. All Documents and Communications that evidence or reflect the impact of Your allegations of abuse against Mr. Depp on Your reputation and/or career.

OBJECTION: Defendant and Counterclaim Plaintiff objects to this Request on the grounds that it is vague, ambiguous, and fails to define with particularity the information that it seeks, and is overly broad, unduly burdensome, harassing, and seeks information not reasonably calculated to lead to the discovery of admissible evidence regarding the claims and defenses in this case, taking into account the needs of the case, the amount in controversy, limitations on the parties' resources, the importance of the discovery in resolving the issues, and critically the Court's prior rulings defining the scope of relevant discovery in this case quoted in detail below.

On November 20, 2020 the Court ruled that Request No. 6 of Ms. Heard's 8th Document Requests seeking documents revealing the impact of other litigation on Mr. Depp's "reputation

and career” as overly broad, burdensome, and unreasonably vague, and therefore holding that the subject was beyond the scope of discovery in this case.

Defendant and Counterclaim Plaintiff further objects to this Request to the extent it seeks financial information, including seeking documents “relating to” it, on the grounds that it is vague, ambiguous, and fails to define with particularity the information that it seeks, and is overly broad, unduly burdensome, harassing, and seeks information not reasonably calculated to lead to the discovery of admissible evidence regarding the claims and defenses in this case, taking into account the needs of the case, the amount in controversy, limitations on the parties’ resources, the importance of the discovery in resolving the issues, and critically the Court’s prior rulings defining the scope of relevant discovery in this case quoted in detail below.

On July 24, 2020 the Court ruled that Request No. 14 of Ms. Heard’s 2nd Request for Documents seeking “income from all sources from 2010 to the present” was overbroad because “those types of things aren’t anything that would be helpful in this case,” along with ruling that discovery seeking “outflow, what his expenses are and whether he spends more money than he makes” was overbroad and beyond the scope of relevant discovery in this case. The Court also ruled that Request 16 of Ms. Heard’s 2nd Request for Documents seeking all transactions from January 1, 2010 to the present with a list of individuals was “overly broad” and beyond the scope of discovery in this case unless these individuals were “going to be potential witnesses” in the case.

On September 18, 2020 the Court ruled that Request Nos. 1-6 and 8 of Ms. Heard’s 7th Requests for Documents and Request Nos. 1, 3, 5, and 7 of Ms. Heard’s 7th Requests seeking financial related documents during the parties’ marriage and related to the divorce case was overbroad and beyond the scope of relevant discovery in this case because “its denied under the

doctrine of enough is enough. You all have been through the divorce already. We're not going to retry that divorce in this case."

Also on September 18, 2020 the Court specifically defined the narrow scope of relevant tax-return discovery in this case as only requiring "the documents which show the gross income...The supporting documents are not to be produced," and further Ordered that only "the amount of income" from the tax returns is relevant and that only involved "limited parts of [the tax return] that would show the income." The Court reiterated this scope of tax-return discovery on November 20 when it further ruled that only the "return pages" of tax returns needed to be produced, and "the supplementary documents that are attached to" the returns were beyond the scope of relevant discovery in this case. Any other tax-related documents are therefore beyond the scope of relevant discovery in this case.

On November 20, 2020 the Court also ruled that Requests 1-5 of Ms. Heard's 8th Requests for Documents seeking deposition transcripts, pleadings, discovery responses, and document production from four other specific litigations regarding disputes over Mr. Depp's finances were "overly broad [and] burdensome" and beyond the scope of discovery in this case.

Defendant and Counterclaim Plaintiff further objects to this Request because it seeks information protected by the attorney-client privilege, and on the grounds that this Request invades protected litigation work product and would require disclosure of core opinion work product and mental impression of counsel, which is prohibited by 4:1(b)(3) of the Rules of the Virginia Supreme Court. Plaintiff and Counterclaim Defendant has not made the requisite showing under the Rules.

RESPONSE: Subject to and without waiving the objections, Defendant and Counterclaim Plaintiff stands on her objections to this Request.

9. All Documents and Communications that evidence or reflect the impact of any and all public statements by Adam Waldman on Your reputation and/or career.

OBJECTION: Defendant and Counterclaim Plaintiff objects to this Request on the grounds that it is vague, ambiguous, and fails to define with particularity the information that it seeks, and is overly broad, unduly burdensome, harassing, and seeks information not reasonably calculated to lead to the discovery of admissible evidence regarding the claims and defenses in this case, taking into account the needs of the case, the amount in controversy, limitations on the parties' resources, the importance of the discovery in resolving the issues, and critically the Court's prior rulings defining the scope of relevant discovery in this case quoted in detail below.

On November 20, 2020 the Court ruled that Request No. 6 of Ms. Heard's 8th Document Requests seeking documents revealing the impact of other litigation on Mr. Depp's "reputation and career" as overly broad, burdensome, and unreasonably vague, and therefore holding that the subject was beyond the scope of discovery in this case.

Defendant and Counterclaim Plaintiff further objects to this Request to the extent it seeks financial information, including seeking documents "relating to" it, on the grounds that it is vague, ambiguous, and fails to define with particularity the information that it seeks, and is overly broad, unduly burdensome, harassing, and seeks information not reasonably calculated to lead to the discovery of admissible evidence regarding the claims and defenses in this case, taking into account the needs of the case, the amount in controversy, limitations on the parties' resources, the importance of the discovery in resolving the issues, and critically the Court's prior rulings defining the scope of relevant discovery in this case quoted in detail below.

On July 24, 2020 the Court ruled that Request No. 14 of Ms. Heard's 2nd Request for Documents seeking "income from all sources from 2010 to the present" was overbroad because

“those types of things aren’t anything that would be helpful in this case,” along with ruling that discovery seeking “outflow, what his expenses are and whether he spends more money than he makes” was overbroad and beyond the scope of relevant discovery in this case. The Court also ruled that Request 16 of Ms. Heard’s 2nd Request for Documents seeking all transactions from January 1, 2010 to the present with a list of individuals was “overly broad” and beyond the scope of discovery in this case unless these individuals were “going to be potential witnesses” in the case.

On September 18, 2020 the Court ruled that Request Nos. 1-6 and 8 of Ms. Heard’s 7th Requests for Documents and Request Nos. 1, 3, 5, and 7 of Ms. Heard’s 7th Requests seeking financial related documents during the parties’ marriage and related to the divorce case was overbroad and beyond the scope of relevant discovery in this case because “its denied under the doctrine of enough is enough. You all have been through the divorce already. We’re not going to retry that divorce in this case.”

Also on September 18, 2020 the Court specifically defined the narrow scope of relevant tax-return discovery in this case as only requiring “the documents which show the gross income...The supporting documents are not to be produced,” and further Ordered that only “the amount of income” from the tax returns is relevant and that only involved “limited parts of [the tax return] that would show the income.” The Court reiterated this scope of tax-return discovery on November 20 when it further ruled that only the “return pages” of tax returns needed to be produced, and “the supplementary documents that are attached to” the returns were beyond the scope of relevant discovery in this case. Any other tax-related documents are therefore beyond the scope of relevant discovery in this case.

On November 20, 2020 the Court also ruled that Requests 1-5 of Ms. Heard's 8th Requests for Documents seeking deposition transcripts, pleadings, discovery responses, and document production from four other specific litigations regarding disputes over Mr. Depp's finances were "overly broad [and] burdensome" and beyond the scope of discovery in this case.

Defendant and Counterclaim Plaintiff further objects to this Request as overly broad, unduly burdensome, and seeking information not reasonably calculated to lead to the discovery of admissible evidence regarding the claims and defenses in this case, based on the Court's January 4, 2021 ruling on the *demurrer* and plea in bar dismissing certain allegations from the Counterclaim.

Defendant and Counterclaim Plaintiff further objects to this Request because it seeks information protected by the attorney-client privilege, and on the grounds that this Request invades protected litigation work product and would require disclosure of core opinion work product and mental impression of counsel, which is prohibited by 4:1(b)(3) of the Rules of the Virginia Supreme Court. Plaintiff and Counterclaim Defendant has not made the requisite showing under the Rules.

RESPONSE: Subject to and without waiving the objections, Defendant and Counterclaim Plaintiff has produced or will produce non-privileged documents in response to this Request relevant to the statements at issue.

10. All Documents and Communications that evidence or reflect the impact of any and all public statements by Mr. Depp on Your reputation and/or career.

OBJECTION: Defendant and Counterclaim Plaintiff objects to this Request on the grounds that it is vague, ambiguous, and fails to define with particularity the information that it seeks, and is overly broad, unduly burdensome, harassing, and seeks information not reasonably

calculated to lead to the discovery of admissible evidence regarding the claims and defenses in this case, taking into account the needs of the case, the amount in controversy, limitations on the parties' resources, the importance of the discovery in resolving the issues, and critically the Court's prior rulings defining the scope of relevant discovery in this case quoted in detail below.

On November 20, 2020 the Court ruled that Request No. 6 of Ms. Heard's 8th Document Requests seeking documents revealing the impact of other litigation on Mr. Depp's "reputation and career" as overly broad, burdensome, and unreasonably vague, and therefore holding that the subject was beyond the scope of discovery in this case.

Defendant and Counterclaim Plaintiff further objects to this Request to the extent it seeks financial information, including seeking documents "relating to" it, on the grounds that it is vague, ambiguous, and fails to define with particularity the information that it seeks, and is overly broad, unduly burdensome, harassing, and seeks information not reasonably calculated to lead to the discovery of admissible evidence regarding the claims and defenses in this case, taking into account the needs of the case, the amount in controversy, limitations on the parties' resources, the importance of the discovery in resolving the issues, and critically the Court's prior rulings defining the scope of relevant discovery in this case quoted in detail below.

On July 24, 2020 the Court ruled that Request No. 14 of Ms. Heard's 2nd Request for Documents seeking "income from all sources from 2010 to the present" was overbroad because "those types of things aren't anything that would be helpful in this case," along with ruling that discovery seeking "outflow, what his expenses are and whether he spends more money than he makes" was overbroad and beyond the scope of relevant discovery in this case. The Court also ruled that Request 16 of Ms. Heard's 2nd Request for Documents seeking all transactions from January 1, 2010 to the present with a list of individuals was "overly broad" and beyond the scope

of discovery in this case unless these individuals were “going to be potential witnesses” in the case.

On September 18, 2020 the Court ruled that Request Nos. 1-6 and 8 of Ms. Heard’s 7th Requests for Documents and Request Nos. 1, 3, 5, and 7 of Ms. Heard’s 7th Requests seeking financial related documents during the parties’ marriage and related to the divorce case was overbroad and beyond the scope of relevant discovery in this case because “its denied under the doctrine of enough is enough. You all have been through the divorce already. We’re not going to retry that divorce in this case.”

Also on September 18, 2020 the Court specifically defined the narrow scope of relevant tax-return discovery in this case as only requiring “the documents which show the gross income...The supporting documents are not to be produced,” and further Ordered that only “the amount of income” from the tax returns is relevant and that only involved “limited parts of [the tax return] that would show the income.” The Court reiterated this scope of tax-return discovery on November 20 when it further ruled that only the “return pages” of tax returns needed to be produced, and “the supplementary documents that are attached to” the returns were beyond the scope of relevant discovery in this case. Any other tax-related documents are therefore beyond the scope of relevant discovery in this case.

On November 20, 2020 the Court also ruled that Requests 1-5 of Ms. Heard’s 8th Requests for Documents seeking deposition transcripts, pleadings, discovery responses, and document production from four other specific litigations regarding disputes over Mr. Depp’s finances were “overly broad [and] burdensome” and beyond the scope of discovery in this case.

Defendant and Counterclaim Plaintiff further objects to this Request as overly broad, unduly burdensome, and seeking information not reasonably calculated to lead to the discovery

of admissible evidence regarding the claims and defenses in this case, based on the Court's January 4, 2021 ruling on the *demurrer* and plea in bar dismissing certain allegations from the Counterclaim.

Defendant and Counterclaim Plaintiff further objects to this Request because it seeks information protected by the attorney-client privilege, and on the grounds that this Request invades protected litigation work product and would require disclosure of core opinion work product and mental impression of counsel, which is prohibited by 4:1(b)(3) of the Rules of the Virginia Supreme Court. Plaintiff and Counterclaim Defendant has not made the requisite showing under the Rules.

RESPONSE: Subject to and without waiving the objections, Defendant and Counterclaim Plaintiff stands on her objections to this Request.

11. All Documents and Communications that refer, reflect, or relate to any contention that You have suffered damages as a result of any alleged statement by Mr. Depp or Adam Waldman.

OBJECTION: Defendant and Counterclaim Plaintiff objects to this Request, including seeking documents "relating to" it, on the grounds that it is vague, ambiguous, and fails to define with particularity the information that it seeks, and is overly broad, unduly burdensome, harassing, and seeks information not reasonably calculated to lead to the discovery of admissible evidence regarding the claims and defenses in this case, taking into account the needs of the case, the amount in controversy, limitations on the parties' resources, the importance of the discovery in resolving the issues, and critically the Court's prior rulings defining the scope of relevant discovery in this case quoted in detail below.

On November 20, 2020 the Court ruled that Request No. 6 of Ms. Heard's 8th Document Requests seeking documents revealing the impact of other litigation on Mr. Depp's "reputation

and career” as overly broad, burdensome, and unreasonably vague, and therefore holding that the subject was beyond the scope of discovery in this case.

Defendant and Counterclaim Plaintiff further objects to this Request to the extent it seeks financial information, including seeking documents “relating to” it, on the grounds that it is vague, ambiguous, and fails to define with particularity the information that it seeks, and is overly broad, unduly burdensome, harassing, and seeks information not reasonably calculated to lead to the discovery of admissible evidence regarding the claims and defenses in this case, taking into account the needs of the case, the amount in controversy, limitations on the parties’ resources, the importance of the discovery in resolving the issues, and critically the Court’s prior rulings defining the scope of relevant discovery in this case quoted in detail below.

On July 24, 2020 the Court ruled that Request No. 14 of Ms. Heard’s 2nd Request for Documents seeking “income from all sources from 2010 to the present” was overbroad because “those types of things aren’t anything that would be helpful in this case,” along with ruling that discovery seeking “outflow, what his expenses are and whether he spends more money than he makes” was overbroad and beyond the scope of relevant discovery in this case. The Court also ruled that Request 16 of Ms. Heard’s 2nd Request for Documents seeking all transactions from January 1, 2010 to the present with a list of individuals was “overly broad” and beyond the scope of discovery in this case unless these individuals were “going to be potential witnesses” in the case.

On September 18, 2020 the Court ruled that Request Nos. 1-6 and 8 of Ms. Heard’s 7th Requests for Documents and Request Nos. 1, 3, 5, and 7 of Ms. Heard’s 7th Requests seeking financial related documents during the parties’ marriage and related to the divorce case was overbroad and beyond the scope of relevant discovery in this case because “its denied under the

doctrine of enough is enough. You all have been through the divorce already. We're not going to retry that divorce in this case."

Also on September 18, 2020 the Court specifically defined the narrow scope of relevant tax-return discovery in this case as only requiring "the documents which show the gross income...The supporting documents are not to be produced," and further Ordered that only "the amount of income" from the tax returns is relevant and that only involved "limited parts of [the tax return] that would show the income." The Court reiterated this scope of tax-return discovery on November 20 when it further ruled that only the "return pages" of tax returns needed to be produced, and "the supplementary documents that are attached to" the returns were beyond the scope of relevant discovery in this case. Any other tax-related documents are therefore beyond the scope of relevant discovery in this case.

On November 20, 2020 the Court also ruled that Requests 1-5 of Ms. Heard's 8th Requests for Documents seeking deposition transcripts, pleadings, discovery responses, and document production from four other specific litigations regarding disputes over Mr. Depp's finances were "overly broad [and] burdensome" and beyond the scope of discovery in this case.

Defendant and Counterclaim Plaintiff further objects to this Request as overly broad, unduly burdensome, and seeking information not reasonably calculated to lead to the discovery of admissible evidence regarding the claims and defenses in this case, based on the Court's January 4, 2021 ruling on the *demurrer* and plea in bar dismissing certain allegations from the Counterclaim.

Defendant and Counterclaim Plaintiff further objects to this Request because it seeks information protected by the attorney-client privilege, and on the grounds that this Request invades protected litigation work product and would require disclosure of core opinion work

product and mental impression of counsel, which is prohibited by 4:1(b)(3) of the Rules of the Virginia Supreme Court. Plaintiff and Counterclaim Defendant has not made the requisite showing under the Rules.

RESPONSE: Subject to and without waiving the objections, Defendant and Counterclaim Plaintiff has produced or will produce non-privileged documents in response to this Request relevant to the statements at issue.

12. All Documents and Communications that support or otherwise relate to Your allegation in paragraph 1 of Your Counterclaim in the above-captioned action that “Mr. Depp and/or his agents acting on his behalf have orchestrated a false and defamatory smear campaign against Ms. Heard.

OBJECTION: Defendant and Counterclaim Plaintiff objects to this Request seeking documents “otherwise relating to” allegations in the Counterclaim on the grounds that it is vague, ambiguous, and fails to define with particularity the information that it seeks, and is overly broad, unduly burdensome, harassing, and seeks information not reasonably calculated to lead to the discovery of admissible evidence regarding the claims and defenses in this case, taking into account the needs of the case, the amount in controversy, limitations on the parties’ resources, the importance of the discovery in resolving the issues, and critically the Court’s prior rulings defining the scope of relevant discovery in this case quoted in detail below.

On December 18, 2020, the Court ruled that Request 51 of Mr. Depp’s 3rd Requests for Documents seeking all communications between Ms. Heard and anyone relating to her relationship with Mr. Depp, claims of abuse or violence involving Mr. Depp, and injuries Ms. Heard contends she suffered as a result of Mr. Depp’s conduct was overbroad, and therefore beyond the scope of discovery in this case. The Court also ruled that Request 52 of Mr. Depp’s 3rd Requests for Documents seeking all documents and communications relating to Ms. Heard’s

“relationship with Mr. Depp” was also overbroad, and therefore beyond the scope of discovery in this case.

Defendant and Counterclaim Plaintiff further objects to this Request as overly broad, unduly burdensome, and seeking information not reasonably calculated to lead to the discovery of admissible evidence regarding the claims and defenses in this case, based on the Court’s January 4, 2021 ruling on the *demurrer* and plea in bar dismissing certain allegations from the Counterclaim.

Defendant and Counterclaim Plaintiff further objects to this Request because it seeks information protected by the attorney-client privilege, and on the grounds that this Request invades protected litigation work product and would require disclosure of core opinion work product and mental impression of counsel, which is prohibited by 4:1(b)(3) of the Rules of the Virginia Supreme Court. Plaintiff and Counterclaim Defendant has not made the requisite showing under the Rules.

RESPONSE: Subject to and without waiving the objections, Defendant and Counterclaim Plaintiff has produced or will produce non-privileged documents in response to this Request relevant to the statements at issue.

13. All Documents and Communications that support or otherwise relate to any contention that You have suffered damages in any form as a result of the “false and defamatory smear campaign” alleged in Your Counterclaim in the above-captioned action at paragraph 1.

OBJECTION: Defendant and Counterclaim Plaintiff objects to this Request seeking financial information, including seeking documents “otherwise relating to” it, on the grounds that it is vague, ambiguous, and fails to define with particularity the information that it seeks, and is overly broad, unduly burdensome, harassing, and seeks information not reasonably calculated to

lead to the discovery of admissible evidence regarding the claims and defenses in this case, taking into account the needs of the case, the amount in controversy, limitations on the parties' resources, the importance of the discovery in resolving the issues, and critically the Court's prior rulings defining the scope of relevant discovery in this case quoted in detail below.

On July 24, 2020 the Court ruled that Request No. 14 of Ms. Heard's 2nd Request for Documents seeking "income from all sources from 2010 to the present" was overbroad because "those types of things aren't anything that would be helpful in this case," along with ruling that discovery seeking "outflow, what his expenses are and whether he spends more money than he makes" was overbroad and beyond the scope of relevant discovery in this case. The Court also ruled that Request 16 of Ms. Heard's 2nd Request for Documents seeking all transactions from January 1, 2010 to the present with a list of individuals was "overly broad" and beyond the scope of discovery in this case unless these individuals were "going to be potential witnesses" in the case.

On September 18, 2020 the Court ruled that Request Nos. 1-6 and 8 of Ms. Heard's 7th Requests for Documents and Request Nos. 1, 3, 5, and 7 of Ms. Heard's 7th Requests seeking financial related documents during the parties' marriage and related to the divorce case was overbroad and beyond the scope of relevant discovery in this case because "its denied under the doctrine of enough is enough. You all have been through the divorce already. We're not going to retry that divorce in this case."

Also on September 18, 2020 the Court specifically defined the narrow scope of relevant tax-return discovery in this case as only requiring "the documents which show the gross income...The supporting documents are not to be produced," and further Ordered that only "the amount of income" from the tax returns is relevant and that only involved "limited parts of [the

tax return] that would show the income.” The Court reiterated this scope of tax-return discovery on November 20 when it further ruled that only the “return pages” of tax returns needed to be produced, and “the supplementary documents that are attached to” the returns were beyond the scope of relevant discovery in this case. Any other tax-related documents are therefore beyond the scope of relevant discovery in this case.

On November 20, 2020 the Court also ruled that Requests 1-5 of Ms. Heard’s 8th Requests for Documents seeking deposition transcripts, pleadings, discovery responses, and document production from four other specific litigations regarding disputes over Mr. Depp’s finances were “overly broad [and] burdensome” and beyond the scope of discovery in this case.

Defendant and Counterclaim Plaintiff further objects to this Request as overly broad, unduly burdensome, and seeking information not reasonably calculated to lead to the discovery of admissible evidence regarding the claims and defenses in this case, based on the Court’s January 4, 2021 ruling on the *demurrer* and plea in bar dismissing certain allegations from the Counterclaim.

Defendant and Counterclaim Plaintiff further objects to this Request because it seeks information protected by the attorney-client privilege, and on the grounds that this Request invades protected litigation work product and would require disclosure of core opinion work product and mental impression of counsel, which is prohibited by 4:1(b)(3) of the Rules of the Virginia Supreme Court. Plaintiff and Counterclaim Defendant has not made the requisite showing under the Rule..

RESPONSE: Subject to and without waiving the objections, Defendant and Counterclaim Plaintiff has produced or will produce non-privileged documents in response to this Request relevant to the statements at issue.

14. All Documents and Communications that support or otherwise relate to Your allegation in paragraph 8 of Your Counterclaim in the above-captioned action that Mr. Depp and/or his agents “created, coordinated, controlled, and/or manipulated social media accounts created specifically for the purpose of targeting Ms. Heard[.]”

OBJECTION: Defendant and Counterclaim Plaintiff objects to this Request seeking documents “otherwise relating to” allegations in the Counterclaim on the grounds that it is vague, ambiguous, and fails to define with particularity the information that it seeks, and is overly broad, unduly burdensome, harassing, and seeks information not reasonably calculated to lead to the discovery of admissible evidence regarding the claims and defenses in this case, taking into account the needs of the case, the amount in controversy, limitations on the parties’ resources, the importance of the discovery in resolving the issues, and critically the Court’s prior rulings defining the scope of relevant discovery in this case quoted in detail below.

On December 18, 2020, the Court ruled that Request 51 of Mr. Depp’s 3rd Requests for Documents seeking all communications between Ms. Heard and anyone relating to her relationship with Mr. Depp, claims of abuse or violence involving Mr. Depp, and injuries Ms. Heard contends she suffered as a result of Mr. Depp’s conduct was overbroad, and therefore beyond the scope of discovery in this case. The Court also ruled that Request 52 of Mr. Depp’s 3rd Requests for Documents seeking all documents and communications relating to Ms. Heard’s “relationship with Mr. Depp” was also overbroad, and therefore beyond the scope of discovery in this case.

Defendant and Counterclaim Plaintiff further objects to this Request as overly broad, unduly burdensome, and seeking information not reasonably calculated to lead to the discovery of admissible evidence regarding the claims and defenses in this case, based on the Court’s

January 4, 2021 ruling on the *demurrer* and plea in bar dismissing certain allegations from the Counterclaim.

Defendant and Counterclaim Plaintiff further objects to this Request because it seeks information protected by the attorney-client privilege, and on the grounds that this Request invades protected litigation work product and would require disclosure of core opinion work product and mental impression of counsel, which is prohibited by 4:1(b)(3) of the Rules of the Virginia Supreme Court. Plaintiff and Counterclaim Defendant has not made the requisite showing under the Rules.

RESPONSE: Subject to and without waiving the objections, Defendant and Counterclaim Plaintiff has produced or will produce non-privileged documents in response to this Request relevant to the statements at issue.

15. All Documents and Communications that refer, reflect, or relate to the “Domestic Violence Restraining Order” referenced in Your Counterclaim at paragraph 24.

OBJECTION: Defendant and Counterclaim Plaintiff objects to this Request, including seeking documents “relating to” it, on the grounds that it is vague, ambiguous, and fails to define with particularity the information that it seeks, and is overly broad, unduly burdensome, harassing, and seeks information not reasonably calculated to lead to the discovery of admissible evidence regarding the claims and defenses in this case, taking into account the needs of the case, the amount in controversy, limitations on the parties’ resources, the importance of the discovery in resolving the issues, and critically the Court’s prior rulings defining the scope of relevant discovery in this case quoted in detail below.

On September 18, 2020 the Court ruled that Request Nos. 1-6 and 8 of Ms. Heard’s 7th Requests for Documents and Request Nos. 1, 3, 5, and 7 of Ms. Heard’s 7th Requests seeking

financial related documents during the parties' marriage and related to the divorce case was overbroad and beyond the scope of relevant discovery in this case because "its denied under the doctrine of enough is enough. You all have been through the divorce already. We're not going to retry that divorce in this case."

Defendant and Counterclaim Plaintiff further objects to this Request because it seeks information protected by the attorney-client privilege, and on the grounds that this Request invades protected litigation work product and would require disclosure of core opinion work product and mental impression of counsel, which is prohibited by 4:1(b)(3) of the Rules of the Virginia Supreme Court. Plaintiff and Counterclaim Defendant has not made the requisite showing under the Rules.

RESPONSE: Subject to and without waiving the objections, Defendant and Counterclaim Plaintiff stands on her objections to this Request.

16. All Documents and Communications that refer, reflect, or relate to the "GQ interview" referenced in Your Counterclaim at paragraphs 33 and 34, and attached as Exhibit A thereto.

OBJECTION: Defendant and Counterclaim Plaintiff objects to this Request seeking documents "relating to" allegations in the Counterclaim on the grounds that it is vague, ambiguous, and fails to define with particularity the information that it seeks, and is overly broad, unduly burdensome, harassing, and seeks information not reasonably calculated to lead to the discovery of admissible evidence regarding the claims and defenses in this case, taking into account the needs of the case, the amount in controversy, limitations on the parties' resources, the importance of the discovery in resolving the issues, and critically the Court's prior rulings defining the scope of relevant discovery in this case quoted in detail below.

On December 18, 2020, the Court ruled that Request 51 of Mr. Depp's 3rd Requests for Documents seeking all communications between Ms. Heard and anyone relating to her relationship with Mr. Depp, claims of abuse or violence involving Mr. Depp, and injuries Ms. Heard contends she suffered as a result of Mr. Depp's conduct was overbroad, and therefore beyond the scope of discovery in this case. The Court also ruled that Request 52 of Mr. Depp's 3rd Requests for Documents seeking all documents and communications relating to Ms. Heard's "relationship with Mr. Depp" was also overbroad, and therefore beyond the scope of discovery in this case.

Defendant and Counterclaim Plaintiff further objects to this Request as overly broad, unduly burdensome, and seeking information not reasonably calculated to lead to the discovery of admissible evidence regarding the claims and defenses in this case, based on the Court's January 4, 2021 ruling on the *demurrer* and plea in bar dismissing certain allegations from the Counterclaim.

Defendant and Counterclaim Plaintiff further objects to this Request because it seeks information protected by the attorney-client privilege, and on the grounds that this Request invades protected litigation work product and would require disclosure of core opinion work product and mental impression of counsel, which is prohibited by 4:1(b)(3) of the Rules of the Virginia Supreme Court. Plaintiff and Counterclaim Defendant has not made the requisite showing under the Rules.

RESPONSE: Subject to and without waiving the objections, Defendant and Counterclaim Plaintiff has produced or will produce non-privileged documents in response to this Request relevant to the statements at issue.

17. All Documents and Communications that support or otherwise relate to any

contention that You have suffered monetary or any other damages as a result of the “GQ interview” referenced in Your Counterclaim at paragraphs 33 and 34, and attached as Exhibit A thereto.

OBJECTION: Defendant and Counterclaim Plaintiff objects to this Request seeking financial information, including seeking documents “otherwise relating to” it, on the grounds that it is vague, ambiguous, and fails to define with particularity the information that it seeks, and is overly broad, unduly burdensome, harassing, and seeks information not reasonably calculated to lead to the discovery of admissible evidence regarding the claims and defenses in this case, taking into account the needs of the case, the amount in controversy, limitations on the parties’ resources, the importance of the discovery in resolving the issues, and critically the Court’s prior rulings defining the scope of relevant discovery in this case quoted in detail below.

On July 24, 2020 the Court ruled that Request No. 14 of Ms. Heard’s 2nd Request for Documents seeking “income from all sources from 2010 to the present” was overbroad because “those types of things aren’t anything that would be helpful in this case,” along with ruling that discovery seeking “outflow, what his expenses are and whether he spends more money than he makes” was overbroad and beyond the scope of relevant discovery in this case. The Court also ruled that Request 16 of Ms. Heard’s 2nd Request for Documents seeking all transactions from January 1, 2010 to the present with a list of individuals was “overly broad” and beyond the scope of discovery in this case unless these individuals were “going to be potential witnesses” in the case.

On September 18, 2020 the Court ruled that Request Nos. 1-6 and 8 of Ms. Heard’s 7th Requests for Documents and Request Nos. 1, 3, 5, and 7 of Ms. Heard’s 7th Requests seeking financial related documents during the parties’ marriage and related to the divorce case was overbroad and beyond the scope of relevant discovery in this case because “its denied under the

doctrine of enough is enough. You all have been through the divorce already. We're not going to retry that divorce in this case."

Also on September 18, 2020 the Court specifically defined the narrow scope of relevant tax-return discovery in this case as only requiring "the documents which show the gross income...The supporting documents are not to be produced," and further Ordered that only "the amount of income" from the tax returns is relevant and that only involved "limited parts of [the tax return] that would show the income." The Court reiterated this scope of tax-return discovery on November 20 when it further ruled that only the "return pages" of tax returns needed to be produced, and "the supplementary documents that are attached to" the returns were beyond the scope of relevant discovery in this case. Any other tax-related documents are therefore beyond the scope of relevant discovery in this case.

On November 20, 2020 the Court also ruled that Requests 1-5 of Ms. Heard's 8th Requests for Documents seeking deposition transcripts, pleadings, discovery responses, and document production from four other specific litigations regarding disputes over Mr. Depp's finances were "overly broad [and] burdensome" and beyond the scope of discovery in this case.

Defendant and Counterclaim Plaintiff further objects to this Request because it seeks information protected by the attorney-client privilege, and on the grounds that this Request invades protected litigation work product and would require disclosure of core opinion work product and mental impression of counsel, which is prohibited by 4:1(b)(3) of the Rules of the Virginia Supreme Court. Plaintiff and Counterclaim Defendant has not made the requisite showing under the Rules.

Defendant and Counterclaim Plaintiff further objects to this Request as overly broad, unduly burdensome, and seeking information not reasonably calculated to lead to the discovery

of admissible evidence regarding the claims and defenses in this case, based on the Court's January 4, 2021 ruling on the *demurrer* and plea in bar dismissing certain allegations from the Counterclaim.

RESPONSE: Subject to and without waiving the objections, Defendant and Counterclaim Plaintiff stands on her objections to this Request.

18. All drafts of Your op-ed published in the *Washington Post*, which is referenced in Your Counterclaim at paragraph 37, and is the subject, at least in part, of the above-captioned action.

OBJECTION: Defendant and Counterclaim Plaintiff further objects to this Request because it seeks information protected by the attorney-client privilege, and on the grounds that this Request invades protected litigation work product and would require disclosure of core opinion work product and mental impression of counsel, which is prohibited by 4:1(b)(3) of the Rules of the Virginia Supreme Court. Plaintiff and Counterclaim Defendant has not made the requisite showing under the Rules.

RESPONSE: Subject to and without waiving the objections, Defendant and Counterclaim Plaintiff has produced or will produce non-privileged documents in response to this Request relevant to the statements at issue.

19. All Documents and Communications regarding Your op-ed published in the *Washington Post*, which is referenced in Your Counterclaim at paragraph 37, and is the subject, at least in part, of the above-captioned action.

OBJECTION: Defendant and Counterclaim Plaintiff objects to this Request on the grounds that it is vague, ambiguous, and fails to define with particularity the information that it seeks, and is overly broad, unduly burdensome, harassing, and seeks information not reasonably calculated to lead to the discovery of admissible evidence regarding the claims and defenses in this case, taking into account the needs of the case, the amount in controversy, limitations on the parties' resources, the importance of the discovery in resolving the issues, and critically the Court's prior rulings defining the scope of relevant discovery in this case quoted in detail below.

On December 18, 2020, the Court ruled that Request 51 of Mr. Depp's 3rd Requests for Documents seeking all communications between Ms. Heard and anyone relating to her relationship with Mr. Depp, claims of abuse or violence involving Mr. Depp, and injuries Ms. Heard contends she suffered as a result of Mr. Depp's conduct was overbroad, and therefore beyond the scope of discovery in this case. The Court also ruled that Request 52 of Mr. Depp's 3rd Requests for Documents seeking all documents and communications relating to Ms. Heard's "relationship with Mr. Depp" was also overbroad, and therefore beyond the scope of discovery in this case.

Defendant and Counterclaim Plaintiff further objects to this Request because it seeks information protected by the attorney-client privilege, and on the grounds that this Request invades protected litigation work product and would require disclosure of core opinion work product and mental impression of counsel, which is prohibited by 4:1(b)(3) of the Rules of the Virginia Supreme Court. Plaintiff and Counterclaim Defendant has not made the requisite showing under the Rules.

RESPONSE: Subject to and without waiving the objections, please refer to the Defendant and Counterclaim Plaintiff's response and document production to Request No. 18 of these 4th Requests for Production of Documents. Defendant and Counterclaim Plaintiff otherwise stands on her objections to this Request.

20. All Documents and Communications that refer, reflect, or relate to the alleged statement by Adam Waldman on April 12, 2019, referenced in Your Counterclaim at paragraph 42, and attached as Exhibit B thereto.

OBJECTION: Defendant and Counterclaim Plaintiff objects to this Request seeking documents "relating to" allegations in the Counterclaim on the grounds that it is vague, ambiguous, and fails to define with particularity the information that it seeks, and is overly broad, unduly burdensome, harassing, and seeks information not reasonably calculated to lead to the discovery of admissible evidence regarding the claims and defenses in this case, taking into account the needs of the case, the amount in controversy, limitations on the parties' resources, the importance of the discovery in resolving the issues, and critically the Court's prior rulings defining the scope of relevant discovery in this case quoted in detail below.

On December 18, 2020, the Court ruled that Request 51 of Mr. Depp's 3rd Requests for Documents seeking all communications between Ms. Heard and anyone relating to her relationship with Mr. Depp, claims of abuse or violence involving Mr. Depp, and injuries Ms. Heard contends she suffered as a result of Mr. Depp's conduct was overbroad, and therefore beyond the scope of discovery in this case. The Court also ruled that Request 52 of Mr. Depp's 3rd Requests for Documents seeking all documents and communications relating to Ms. Heard's "relationship with Mr. Depp" was also overbroad, and therefore beyond the scope of discovery in this case.

Defendant and Counterclaim Plaintiff further objects to this Request as overly broad, unduly burdensome, and seeking information not reasonably calculated to lead to the discovery of admissible evidence regarding the claims and defenses in this case, based on the Court's January 4, 2021 ruling on the *demurrer* and plea in bar dismissing certain allegations from the Counterclaim.

Defendant and Counterclaim Plaintiff further objects to this Request because it seeks information protected by the attorney-client privilege, and on the grounds that this Request invades protected litigation work product and would require disclosure of core opinion work product and mental impression of counsel, which is prohibited by 4:1(b)(3) of the Rules of the Virginia Supreme Court. Plaintiff and Counterclaim Defendant has not made the requisite showing under the Rules.

RESPONSE: Subject to and without waiving the objections, Defendant and Counterclaim Plaintiff has produced or will produce non-privileged documents in response to this Request relevant to the statements at issue in the claims, allegations, and defenses in this case.

21. All Documents and Communications that support or otherwise relate to any contention that You have suffered monetary or any other damages as a result of the alleged statement by Adam Waldman on April 12, 2019, referenced in Your Counterclaim at paragraph 42, and attached as Exhibit B thereto.

OBJECTION: Defendant and Counterclaim Plaintiff objects to this Request seeking financial information, including seeking documents "otherwise relating to" it, on the grounds that it is vague, ambiguous, and fails to define with particularity the information that it seeks, and is overly broad, unduly burdensome, harassing, and seeks information not reasonably calculated to lead to the discovery of admissible evidence regarding the claims and defenses in this case,

taking into account the needs of the case, the amount in controversy, limitations on the parties' resources, the importance of the discovery in resolving the issues, and critically the Court's prior rulings defining the scope of relevant discovery in this case quoted in detail below.

On July 24, 2020 the Court ruled that Request No. 14 of Ms. Heard's 2nd Request for Documents seeking "income from all sources from 2010 to the present" was overbroad because "those types of things aren't anything that would be helpful in this case," along with ruling that discovery seeking "outflow, what his expenses are and whether he spends more money than he makes" was overbroad and beyond the scope of relevant discovery in this case. The Court also ruled that Request 16 of Ms. Heard's 2nd Request for Documents seeking all transactions from January 1, 2010 to the present with a list of individuals was "overly broad" and beyond the scope of discovery in this case unless these individuals were "going to be potential witnesses" in the case.

On September 18, 2020 the Court ruled that Request Nos. 1-6 and 8 of Ms. Heard's 7th Requests for Documents and Request Nos. 1, 3, 5, and 7 of Ms. Heard's 7th Requests seeking financial related documents during the parties' marriage and related to the divorce case was overbroad and beyond the scope of relevant discovery in this case because "its denied under the doctrine of enough is enough. You all have been through the divorce already. We're not going to retry that divorce in this case."

Also on September 18, 2020 the Court specifically defined the narrow scope of relevant tax-return discovery in this case as only requiring "the documents which show the gross income...The supporting documents are not to be produced," and further Ordered that only "the amount of income" from the tax returns is relevant and that only involved "limited parts of [the tax return] that would show the income." The Court reiterated this scope of tax-return discovery

on November 20 when it further ruled that only the “return pages” of tax returns needed to be produced, and “the supplementary documents that are attached to” the returns were beyond the scope of relevant discovery in this case. Any other tax-related documents are therefore beyond the scope of relevant discovery in this case.

On November 20, 2020 the Court also ruled that Requests 1-5 of Ms. Heard’s 8th Requests for Documents seeking deposition transcripts, pleadings, discovery responses, and document production from four other specific litigations regarding disputes over Mr. Depp’s finances were “overly broad [and] burdensome” and beyond the scope of discovery in this case.

Defendant and Counterclaim Plaintiff further objects to this Request as overly broad, unduly burdensome, and seeking information not reasonably calculated to lead to the discovery of admissible evidence regarding the claims and defenses in this case, based on the Court’s January 4, 2021 ruling on the *demurrer* and plea in bar dismissing certain allegations from the Counterclaim.

Defendant and Counterclaim Plaintiff further objects to this Request because it seeks information protected by the attorney-client privilege, and on the grounds that this Request invades protected litigation work product and would require disclosure of core opinion work product and mental impression of counsel, which is prohibited by 4:1(b)(3) of the Rules of the Virginia Supreme Court. Plaintiff and Counterclaim Defendant has not made the requisite showing under the Rules.

RESPONSE: Subject to and without waiving the objections, Defendant and Counterclaim Plaintiff stands on her objections to this Request.

22. All Documents and Communications that refer, reflect, or relate to the alleged statement by Adam Waldman in June 2019, referenced in Your Counterclaim at paragraph 43, and attached as Exhibit C thereto.

OBJECTION: Defendant and Counterclaim Plaintiff objects to this Request seeking documents “relating to” allegations in the Counterclaim on the grounds that it is vague, ambiguous, and fails to define with particularity the information that it seeks, and is overly broad, unduly burdensome, harassing, and seeks information not reasonably calculated to lead to the discovery of admissible evidence regarding the claims and defenses in this case, taking into account the needs of the case, the amount in controversy, limitations on the parties’ resources, the importance of the discovery in resolving the issues, and critically the Court’s prior rulings defining the scope of relevant discovery in this case quoted in detail below.

On December 18, 2020, the Court ruled that Request 51 of Mr. Depp’s 3rd Requests for Documents seeking all communications between Ms. Heard and anyone relating to her relationship with Mr. Depp, claims of abuse or violence involving Mr. Depp, and injuries Ms. Heard contends she suffered as a result of Mr. Depp’s conduct was overbroad, and therefore beyond the scope of discovery in this case. The Court also ruled that Request 52 of Mr. Depp’s 3rd Requests for Documents seeking all documents and communications relating to Ms. Heard’s “relationship with Mr. Depp” was also overbroad, and therefore beyond the scope of discovery in this case.

Defendant and Counterclaim Plaintiff further objects to this Request as overly broad, unduly burdensome, and seeking information not reasonably calculated to lead to the discovery of admissible evidence regarding the claims and defenses in this case, based on the Court’s January 4, 2021 ruling on the *demurrer* and plea in bar dismissing certain allegations from the Counterclaim.

Defendant and Counterclaim Plaintiff further objects to this Request because it seeks information protected by the attorney-client privilege, and on the grounds that this Request invades protected litigation work product and would require disclosure of core opinion work product and mental impression of counsel, which is prohibited by 4:1(b)(3) of the Rules of the Virginia Supreme Court. Plaintiff and Counterclaim Defendant has not made the requisite showing under the Rules.

RESPONSE: Subject to and without waiving the objections, Defendant and Counterclaim Plaintiff has produced or will produce non-privileged documents in response to this Request relevant to the statements at issue.

23. All Documents and Communications that support or otherwise relate to any contention that You have suffered monetary or any other damages as a result of the alleged statement by Adam Waldman in June 2019, referenced in Your Counterclaim at paragraph 43, and attached as Exhibit C thereto.

OBJECTION: Defendant and Counterclaim Plaintiff objects to this Request seeking financial information, including seeking documents “otherwise relating to” it, on the grounds that it is vague, ambiguous, and fails to define with particularity the information that it seeks, and is overly broad, unduly burdensome, harassing, and seeks information not reasonably calculated to lead to the discovery of admissible evidence regarding the claims and defenses in this case, taking into account the needs of the case, the amount in controversy, limitations on the parties’ resources, the importance of the discovery in resolving the issues, and critically the Court’s prior rulings defining the scope of relevant discovery in this case quoted in detail below.

On July 24, 2020 the Court ruled that Request No. 14 of Ms. Heard’s 2nd Request for Documents seeking “income from all sources from 2010 to the present” was overbroad because “those types of things aren’t anything that would be helpful in this case,” along with ruling that

discovery seeking “outflow, what his expenses are and whether he spends more money than he makes” was overbroad and beyond the scope of relevant discovery in this case. The Court also ruled that Request 16 of Ms. Heard’s 2nd Request for Documents seeking all transactions from January 1, 2010 to the present with a list of individuals was “overly broad” and beyond the scope of discovery in this case unless these individuals were “going to be potential witnesses” in the case.

On September 18, 2020 the Court ruled that Request Nos. 1-6 and 8 of Ms. Heard’s 7th Requests for Documents and Request Nos. 1, 3, 5, and 7 of Ms. Heard’s 7th Requests seeking financial related documents during the parties’ marriage and related to the divorce case was overbroad and beyond the scope of relevant discovery in this case because “its denied under the doctrine of enough is enough. You all have been through the divorce already. We’re not going to retry that divorce in this case.”

Also on September 18, 2020 the Court specifically defined the narrow scope of relevant tax-return discovery in this case as only requiring “the documents which show the gross income...The supporting documents are not to be produced,” and further Ordered that only “the amount of income” from the tax returns is relevant and that only involved “limited parts of [the tax return] that would show the income.” The Court reiterated this scope of tax-return discovery on November 20 when it further ruled that only the “return pages” of tax returns needed to be produced, and “the supplementary documents that are attached to” the returns were beyond the scope of relevant discovery in this case. Any other tax-related documents are therefore beyond the scope of relevant discovery in this case.

On November 20, 2020 the Court also ruled that Requests 1-5 of Ms. Heard’s 8th Requests for Documents seeking deposition transcripts, pleadings, discovery responses, and

document production from four other specific litigations regarding disputes over Mr. Depp's finances were "overly broad [and] burdensome" and beyond the scope of discovery in this case.

Defendant and Counterclaim Plaintiff further objects to this Request as overly broad, unduly burdensome, and seeking information not reasonably calculated to lead to the discovery of admissible evidence regarding the claims and defenses in this case, based on the Court's January 4, 2021 ruling on the *demurrer* and plea in bar dismissing certain allegations from the Counterclaim.

Defendant and Counterclaim Plaintiff further objects to this Request because it seeks information protected by the attorney-client privilege, and on the grounds that this Request invades protected litigation work product and would require disclosure of core opinion work product and mental impression of counsel, which is prohibited by 4:1(b)(3) of the Rules of the Virginia Supreme Court. Plaintiff and Counterclaim Defendant has not made the requisite showing under the Rules.

RESPONSE: Subject to and without waiving the objections, Defendant and Counterclaim Plaintiff stands on her objections to this Request.

24. All Documents and Communications that refer, reflect, or relate to the alleged statement by Adam Waldman in July 2019, referenced in Your Counterclaim at paragraph 44, and attached as Exhibit D thereto.

OBJECTION: Defendant and Counterclaim Plaintiff objects to this Request seeking documents "relating to" allegations in the Counterclaim on the grounds that it is vague, ambiguous, and fails to define with particularity the information that it seeks, and is overly broad, unduly burdensome, harassing, and seeks information not reasonably calculated to lead to the discovery of admissible evidence regarding the claims and defenses in this case, taking into account the needs of the case, the amount in controversy, limitations on the parties' resources,

the importance of the discovery in resolving the issues, and critically the Court's prior rulings defining the scope of relevant discovery in this case quoted in detail below.

On December 18, 2020, the Court ruled that Request 51 of Mr. Depp's 3rd Requests for Documents seeking all communications between Ms. Heard and anyone relating to her relationship with Mr. Depp, claims of abuse or violence involving Mr. Depp, and injuries Ms. Heard contends she suffered as a result of Mr. Depp's conduct was overbroad, and therefore beyond the scope of discovery in this case. The Court also ruled that Request 52 of Mr. Depp's 3rd Requests for Documents seeking all documents and communications relating to Ms. Heard's "relationship with Mr. Depp" was also overbroad, and therefore beyond the scope of discovery in this case.

Defendant and Counterclaim Plaintiff further objects to this Request as overly broad, unduly burdensome, and seeking information not reasonably calculated to lead to the discovery of admissible evidence regarding the claims and defenses in this case, based on the Court's January 4, 2021 ruling on the *demurrer* and plea in bar dismissing certain allegations from the Counterclaim.

Defendant and Counterclaim Plaintiff further objects to this Request because it seeks information protected by the attorney-client privilege, and on the grounds that this Request invades protected litigation work product and would require disclosure of core opinion work product and mental impression of counsel, which is prohibited by 4:1(b)(3) of the Rules of the Virginia Supreme Court. Plaintiff and Counterclaim Defendant has not made the requisite showing under the Rules.

RESPONSE: Subject to and without waiving the objections, Defendant and Counterclaim Plaintiff has produced or will produce non-privileged documents in response to

this Request relevant to the statements at issue in the claims, allegations, and defenses in this case.

25. All Documents and Communications that support or otherwise relate to any contention that You have suffered monetary or any other damages as a result of the alleged statement by Adam Waldman in July 2019, referenced in Your Counterclaim at paragraph 44, and attached as Exhibit D thereto.

OBJECTION: Defendant and Counterclaim Plaintiff objects to this Request seeking financial information, including seeking documents “relating to” it, on the grounds that it is vague, ambiguous, and fails to define with particularity the information that it seeks, and is overly broad, unduly burdensome, harassing, and seeks information not reasonably calculated to lead to the discovery of admissible evidence regarding the claims and defenses in this case, taking into account the needs of the case, the amount in controversy, limitations on the parties’ resources, the importance of the discovery in resolving the issues, and critically the Court’s prior rulings defining the scope of relevant discovery in this case quoted in detail below.

On July 24, 2020 the Court ruled that Request No. 14 of Ms. Heard’s 2nd Request for Documents seeking “income from all sources from 2010 to the present” was overbroad because “those types of things aren’t anything that would be helpful in this case,” along with ruling that discovery seeking “outflow, what his expenses are and whether he spends more money than he makes” was overbroad and beyond the scope of relevant discovery in this case. The Court also ruled that Request 16 of Ms. Heard’s 2nd Request for Documents seeking all transactions from January 1, 2010 to the present with a list of individuals was “overly broad” and beyond the scope of discovery in this case unless these individuals were “going to be potential witnesses” in the case.

On September 18, 2020 the Court ruled that Request Nos. 1-6 and 8 of Ms. Heard's 7th Requests for Documents and Request Nos. 1, 3, 5, and 7 of Ms. Heard's 7th Requests seeking financial related documents during the parties' marriage and related to the divorce case was overbroad and beyond the scope of relevant discovery in this case because "its denied under the doctrine of enough is enough. You all have been through the divorce already. We're not going to retry that divorce in this case."

Also on September 18, 2020 the Court specifically defined the narrow scope of relevant tax-return discovery in this case as only requiring "the documents which show the gross income...The supporting documents are not to be produced," and further Ordered that only "the amount of income" from the tax returns is relevant and that only involved "limited parts of [the tax return] that would show the income." The Court reiterated this scope of tax-return discovery on November 20 when it further ruled that only the "return pages" of tax returns needed to be produced, and "the supplementary documents that are attached to" the returns were beyond the scope of relevant discovery in this case. Any other tax-related documents are therefore beyond the scope of relevant discovery in this case.

On November 20, 2020 the Court also ruled that Requests 1-5 of Ms. Heard's 8th Requests for Documents seeking deposition transcripts, pleadings, discovery responses, and document production from four other specific litigations regarding disputes over Mr. Depp's finances were "overly broad [and] burdensome" and beyond the scope of discovery in this case.

Defendant and Counterclaim Plaintiff further objects to this Request as overly broad, unduly burdensome, and seeking information not reasonably calculated to lead to the discovery of admissible evidence regarding the claims and defenses in this case, based on the Court's

January 4, 2021 ruling on the *demurrer* and plea in bar dismissing certain allegations from the Counterclaim.

Defendant and Counterclaim Plaintiff further objects to this Request because it seeks information protected by the attorney-client privilege, and on the grounds that this Request invades protected litigation work product and would require disclosure of core opinion work product and mental impression of counsel, which is prohibited by 4:1(b)(3) of the Rules of the Virginia Supreme Court. Plaintiff and Counterclaim Defendant has not made the requisite showing under the Rules.

RESPONSE: Subject to and without waiving the objections, Defendant and Counterclaim Plaintiff stands on her objections to this Request.

26. All Documents and Communications that refer, reflect, or relate to the alleged statement by Adam Waldman in July 2019, referenced in Your Counterclaim at paragraph 44, and attached as Exhibit E thereto.

OBJECTION: Defendant and Counterclaim Plaintiff objects to this Request seeking documents “relating to” allegations in the Counterclaim on the grounds that it is vague, ambiguous, and fails to define with particularity the information that it seeks, and is overly broad, unduly burdensome, harassing, and seeks information not reasonably calculated to lead to the discovery of admissible evidence regarding the claims and defenses in this case, taking into account the needs of the case, the amount in controversy, limitations on the parties’ resources, the importance of the discovery in resolving the issues, and critically the Court’s prior rulings defining the scope of relevant discovery in this case quoted in detail below.

On December 18, 2020, the Court ruled that Request 51 of Mr. Depp’s 3rd Requests for Documents seeking all communications between Ms. Heard and anyone relating to her relationship with Mr. Depp, claims of abuse or violence involving Mr. Depp, and injuries Ms.

Heard contends she suffered as a result of Mr. Depp's conduct was overbroad, and therefore beyond the scope of discovery in this case. The Court also ruled that Request 52 of Mr. Depp's 3rd Requests for Documents seeking all documents and communications relating to Ms. Heard's "relationship with Mr. Depp" was also overbroad, and therefore beyond the scope of discovery in this case

Defendant and Counterclaim Plaintiff further objects to this Request as overly broad, unduly burdensome, and seeking information not reasonably calculated to lead to the discovery of admissible evidence regarding the claims and defenses in this case, based on the Court's January 4, 2021 ruling on the *demurrer* and plea in bar dismissing certain allegations from the Counterclaim.

Defendant and Counterclaim Plaintiff further objects to this Request because it seeks information protected by the attorney-client privilege, and on the grounds that this Request invades protected litigation work product and would require disclosure of core opinion work product and mental impression of counsel, which is prohibited by 4:1(b)(3) of the Rules of the Virginia Supreme Court. Plaintiff and Counterclaim Defendant has not made the requisite showing under the Rules.

RESPONSE: Subject to and without waiving the objections, Defendant and Counterclaim Plaintiff has produced or will produce non-privileged documents in response to this Request relevant to the statements at issue.

27. All Documents and Communications that support or otherwise relate to any contention that You have suffered monetary or any other damages as a result of the alleged statement by Adam Waldman in July 2019, referenced in Your Counterclaim at paragraph 44, and attached as Exhibit E thereto.

OBJECTION: Defendant and Counterclaim Plaintiff objects to this Request seeking financial information, including seeking documents “otherwise relating to” it, on the grounds that it is vague, ambiguous, and fails to define with particularity the information that it seeks, and is overly broad, unduly burdensome, harassing, and seeks information not reasonably calculated to lead to the discovery of admissible evidence regarding the claims and defenses in this case, taking into account the needs of the case, the amount in controversy, limitations on the parties’ resources, the importance of the discovery in resolving the issues, and critically the Court’s prior rulings defining the scope of relevant discovery in this case quoted in detail below.

On July 24, 2020 the Court ruled that Request No. 14 of Ms. Heard’s 2nd Request for Documents seeking “income from all sources from 2010 to the present” was overbroad because “those types of things aren’t anything that would be helpful in this case,” along with ruling that discovery seeking “outflow, what his expenses are and whether he spends more money than he makes” was overbroad and beyond the scope of relevant discovery in this case. The Court also ruled that Request 16 of Ms. Heard’s 2nd Request for Documents seeking all transactions from January 1, 2010 to the present with a list of individuals was “overly broad” and beyond the scope of discovery in this case unless these individuals were “going to be potential witnesses” in the case.

On September 18, 2020 the Court ruled that Request Nos. 1-6 and 8 of Ms. Heard’s 7th Requests for Documents and Request Nos. 1, 3, 5, and 7 of Ms. Heard’s 7th Requests seeking financial related documents during the parties’ marriage and related to the divorce case was

overbroad and beyond the scope of relevant discovery in this case because “its denied under the doctrine of enough is enough. You all have been through the divorce already. We’re not going to retry that divorce in this case.”

Also on September 18, 2020 the Court specifically defined the narrow scope of relevant tax-return discovery in this case as only requiring “the documents which show the gross income...The supporting documents are not to be produced,” and further Ordered that only “the amount of income” from the tax returns is relevant and that only involved “limited parts of [the tax return] that would show the income.” The Court reiterated this scope of tax-return discovery on November 20 when it further ruled that only the “return pages” of tax returns needed to be produced, and “the supplementary documents that are attached to” the returns were beyond the scope of relevant discovery in this case. Any other tax-related documents are therefore beyond the scope of relevant discovery in this case.

On November 20, 2020 the Court also ruled that Requests 1-5 of Ms. Heard’s 8th Requests for Documents seeking deposition transcripts, pleadings, discovery responses, and document production from four other specific litigations regarding disputes over Mr. Depp’s finances were “overly broad [and] burdensome” and beyond the scope of discovery in this case.

Defendant and Counterclaim Plaintiff further objects to this Request as overly broad, unduly burdensome, and seeking information not reasonably calculated to lead to the discovery of admissible evidence regarding the claims and defenses in this case, based on the Court’s January 4, 2021 ruling on the *demurrer* and plea in bar dismissing certain allegations from the Counterclaim.

Defendant and Counterclaim Plaintiff further objects to this Request because it seeks information protected by the attorney-client privilege, and on the grounds that this Request

invades protected litigation work product and would require disclosure of core opinion work product and mental impression of counsel, which is prohibited by 4:1(b)(3) of the Rules of the Virginia Supreme Court. Plaintiff and Counterclaim Defendant has not made the requisite showing under the Rules.

RESPONSE: Subject to and without waiving the objections, Defendant and Counterclaim Plaintiff stands on her objections to this Request.

28. All Documents and Communications that refer, reflect, or relate to the alleged statement by Adam Waldman in April 2020, referenced in Your Counterclaim at paragraph 45, and attached as Exhibit F thereto.

OBJECTION: Defendant and Counterclaim Plaintiff objects to this Request seeking documents “relating to” allegations in the Counterclaim on the grounds that it is vague, ambiguous, and fails to define with particularity the information that it seeks, and is overly broad, unduly burdensome, harassing, and seeks information not reasonably calculated to lead to the discovery of admissible evidence regarding the claims and defenses in this case, taking into account the needs of the case, the amount in controversy, limitations on the parties’ resources, the importance of the discovery in resolving the issues, and critically the Court’s prior rulings defining the scope of relevant discovery in this case quoted in detail below.

On December 18, 2020, the Court ruled that Request 51 of Mr. Depp’s 3rd Requests for Documents seeking all communications between Ms. Heard and anyone relating to her relationship with Mr. Depp, claims of abuse or violence involving Mr. Depp, and injuries Ms. Heard contends she suffered as a result of Mr. Depp’s conduct was overbroad, and therefore beyond the scope of discovery in this case. The Court also ruled that Request 52 of Mr. Depp’s 3rd Requests for Documents seeking all documents and communications relating to Ms. Heard’s

“relationship with Mr. Depp” was also overbroad, and therefore beyond the scope of discovery in this case.

Defendant and Counterclaim Plaintiff further objects to this Request because it seeks information protected by the attorney-client privilege, and on the grounds that this Request invades protected litigation work product and would require disclosure of core opinion work product and mental impression of counsel, which is prohibited by 4:1(b)(3) of the Rules of the Virginia Supreme Court. Plaintiff and Counterclaim Defendant has not made the requisite showing under the Rules.

RESPONSE: Subject to and without waiving the objections, Defendant and Counterclaim Plaintiff has produced or will produce non-privileged documents in response to this Request relevant to the statements at issue.

29. All Documents and Communications that support or otherwise relate to any contention that You have suffered monetary or any other damages as a result of the alleged statement by Adam Waldman in April 2020, referenced in Your Counterclaim at paragraph 45, and attached as Exhibit F thereto.

OBJECTION: Defendant and Counterclaim Plaintiff objects to this Request seeking financial information, including seeking documents otherwise relating to” it, on the grounds that it is vague, ambiguous, and fails to define with particularity the information that it seeks, and is overly broad, unduly burdensome, harassing, and seeks information not reasonably calculated to lead to the discovery of admissible evidence regarding the claims and defenses in this case, taking into account the needs of the case, the amount in controversy, limitations on the parties’ resources, the importance of the discovery in resolving the issues, and critically the Court’s prior rulings defining the scope of relevant discovery in this case quoted in detail below.

On July 24, 2020 the Court ruled that Request No. 14 of Ms. Heard's 2nd Request for Documents seeking "income from all sources from 2010 to the present" was overbroad because "those types of things aren't anything that would be helpful in this case," along with ruling that discovery seeking "outflow, what his expenses are and whether he spends more money than he makes" was overbroad and beyond the scope of relevant discovery in this case. The Court also ruled that Request 16 of Ms. Heard's 2nd Request for Documents seeking all transactions from January 1, 2010 to the present with a list of individuals was "overly broad" and beyond the scope of discovery in this case unless these individuals were "going to be potential witnesses" in the case.

On September 18, 2020 the Court ruled that Request Nos. 1-6 and 8 of Ms. Heard's 7th Requests for Documents and Request Nos. 1, 3, 5, and 7 of Ms. Heard's 7th Requests seeking financial related documents during the parties' marriage and related to the divorce case was overbroad and beyond the scope of relevant discovery in this case because "its denied under the doctrine of enough is enough. You all have been through the divorce already. We're not going to retry that divorce in this case."

Also on September 18, 2020 the Court specifically defined the narrow scope of relevant tax-return discovery in this case as only requiring "the documents which show the gross income...The supporting documents are not to be produced," and further Ordered that only "the amount of income" from the tax returns is relevant and that only involved "limited parts of [the tax return] that would show the income." The Court reiterated this scope of tax-return discovery on November 20 when it further ruled that only the "return pages" of tax returns needed to be produced, and "the supplementary documents that are attached to" the returns were beyond the

scope of relevant discovery in this case. Any other tax-related documents are therefore beyond the scope of relevant discovery in this case.

On November 20, 2020 the Court also ruled that Requests 1-5 of Ms. Heard's 8th Requests for Documents seeking deposition transcripts, pleadings, discovery responses, and document production from four other specific litigations regarding disputes over Mr. Depp's finances were "overly broad [and] burdensome" and beyond the scope of discovery in this case.

Defendant and Counterclaim Plaintiff further objects to this Request because it seeks information protected by the attorney-client privilege, and on the grounds that this Request invades protected litigation work product and would require disclosure of core opinion work product and mental impression of counsel, which is prohibited by 4:1(b)(3) of the Rules of the Virginia Supreme Court. Plaintiff and Counterclaim Defendant has not made the requisite showing under the Rules.

RESPONSE: Subject to and without waiving the objections, Defendant and Counterclaim Plaintiff has produced or will produce non-privileged documents in response to this Request relevant to the statements at issue.

30. All Documents and Communications that refer, reflect, or relate to the alleged statement by Adam Waldman in April 2020, referenced in Your Counterclaim at paragraph 46, and attached as Exhibit G thereto.

OBJECTION: Defendant and Counterclaim Plaintiff objects to this Request seeking documents "relating to" allegations in the Counterclaim on the grounds that it is vague, ambiguous, and fails to define with particularity the information that it seeks, and is overly broad, unduly burdensome, harassing, and seeks information not reasonably calculated to lead to the discovery of admissible evidence regarding the claims and defenses in this case, taking into account the needs of the case, the amount in controversy, limitations on the parties' resources,

the importance of the discovery in resolving the issues, and critically the Court's prior rulings defining the scope of relevant discovery in this case quoted in detail below.

On December 18, 2020, the Court ruled that Request 51 of Mr. Depp's 3rd Requests for Documents seeking all communications between Ms. Heard and anyone relating to her relationship with Mr. Depp, claims of abuse or violence involving Mr. Depp, and injuries Ms. Heard contends she suffered as a result of Mr. Depp's conduct was overbroad, and therefore beyond the scope of discovery in this case. The Court also ruled that Request 52 of Mr. Depp's 3rd Requests for Documents seeking all documents and communications relating to Ms. Heard's "relationship with Mr. Depp" was also overbroad, and therefore beyond the scope of discovery in this case.

Defendant and Counterclaim Plaintiff further objects to this Request because it seeks information protected by the attorney-client privilege, and on the grounds that this Request invades protected litigation work product and would require disclosure of core opinion work product and mental impression of counsel, which is prohibited by 4:1(b)(3) of the Rules of the Virginia Supreme Court. Plaintiff and Counterclaim Defendant has not made the requisite showing under the Rules.

RESPONSE: Subject to and without waiving the objections, Defendant and Counterclaim Plaintiff has produced or will produce non-privileged documents in response to this Request relevant to the statements at issue.

31. All Documents and Communications that support or otherwise relate to any contention that You have suffered monetary or any other damages as a result of the alleged statement by Adam Waldman in April 2020, referenced in Your Counterclaim at paragraph 46, and attached as Exhibit G thereto.

OBJECTION: Defendant and Counterclaim Plaintiff objects to this Request seeking financial information, including seeking documents “otherwise relating to” it, on the grounds that it is vague, ambiguous, and fails to define with particularity the information that it seeks, and is overly broad, unduly burdensome, harassing, and seeks information not reasonably calculated to lead to the discovery of admissible evidence regarding the claims and defenses in this case, taking into account the needs of the case, the amount in controversy, limitations on the parties’ resources, the importance of the discovery in resolving the issues, and critically the Court’s prior rulings defining the scope of relevant discovery in this case quoted in detail below.

On July 24, 2020 the Court ruled that Request No. 14 of Ms. Heard’s 2nd Request for Documents seeking “income from all sources from 2010 to the present” was overbroad because “those types of things aren’t anything that would be helpful in this case,” along with ruling that discovery seeking “outflow, what his expenses are and whether he spends more money than he makes” was overbroad and beyond the scope of relevant discovery in this case. The Court also ruled that Request 16 of Ms. Heard’s 2nd Request for Documents seeking all transactions from January 1, 2010 to the present with a list of individuals was “overly broad” and beyond the scope of discovery in this case unless these individuals were “going to be potential witnesses” in the case.

On September 18, 2020 the Court ruled that Request Nos. 1-6 and 8 of Ms. Heard’s 7th Requests for Documents and Request Nos. 1, 3, 5, and 7 of Ms. Heard’s 7th Requests seeking financial related documents during the parties’ marriage and related to the divorce case was

overbroad and beyond the scope of relevant discovery in this case because “its denied under the doctrine of enough is enough. You all have been through the divorce already. We’re not going to retry that divorce in this case.”

Also on September 18, 2020 the Court specifically defined the narrow scope of relevant tax-return discovery in this case as only requiring “the documents which show the gross income...The supporting documents are not to be produced,” and further Ordered that only “the amount of income” from the tax returns is relevant and that only involved “limited parts of [the tax return] that would show the income.” The Court reiterated this scope of tax-return discovery on November 20 when it further ruled that only the “return pages” of tax returns needed to be produced, and “the supplementary documents that are attached to” the returns were beyond the scope of relevant discovery in this case. Any other tax-related documents are therefore beyond the scope of relevant discovery in this case.

On November 20, 2020 the Court also ruled that Requests 1-5 of Ms. Heard’s 8th Requests for Documents seeking deposition transcripts, pleadings, discovery responses, and document production from four other specific litigations regarding disputes over Mr. Depp’s finances were “overly broad [and] burdensome” and beyond the scope of discovery in this case.

Defendant and Counterclaim Plaintiff further objects to this Request because it seeks information protected by the attorney-client privilege, and on the grounds that this Request invades protected litigation work product and would require disclosure of core opinion work product and mental impression of counsel, which is prohibited by 4:1(b)(3) of the Rules of the Virginia Supreme Court. Plaintiff and Counterclaim Defendant has not made the requisite showing under the Rules.

RESPONSE: Subject to and without waiving the objections, Defendant and Counterclaim Plaintiff has produced or will produce non-privileged documents in response to this Request relevant to the statements at issue.

32. All Documents and Communications that refer, reflect, or relate to the alleged statement by Adam Waldman in June 2020, referenced in Your Counterclaim at paragraph 47, and attached as Exhibit G thereto.

OBJECTION: Defendant and Counterclaim Plaintiff objects to this Request seeking documents “relating to” allegations in the Counterclaim on the grounds that it is vague, ambiguous, and fails to define with particularity the information that it seeks, and is overly broad, unduly burdensome, harassing, and seeks information not reasonably calculated to lead to the discovery of admissible evidence regarding the claims and defenses in this case, taking into account the needs of the case, the amount in controversy, limitations on the parties’ resources, the importance of the discovery in resolving the issues, and critically the Court’s prior rulings defining the scope of relevant discovery in this case quoted in detail below.

On December 18, 2020, the Court ruled that Request 51 of Mr. Depp’s 3rd Requests for Documents seeking all communications between Ms. Heard and anyone relating to her relationship with Mr. Depp, claims of abuse or violence involving Mr. Depp, and injuries Ms. Heard contends she suffered as a result of Mr. Depp’s conduct was overbroad, and therefore beyond the scope of discovery in this case. The Court also ruled that Request 52 of Mr. Depp’s 3rd Requests for Documents seeking all documents and communications relating to Ms. Heard’s “relationship with Mr. Depp” was also overbroad, and therefore beyond the scope of discovery in this case.

Defendant and Counterclaim Plaintiff further objects to this Request because it seeks information protected by the attorney-client privilege, and on the grounds that this Request

invades protected litigation work product and would require disclosure of core opinion work product and mental impression of counsel, which is prohibited by 4:1(b)(3) of the Rules of the Virginia Supreme Court. Plaintiff and Counterclaim Defendant has not made the requisite showing under the Rules.

RESPONSE: Subject to and without waiving the objections, Defendant and Counterclaim Plaintiff has produced or will produce non-privileged documents in response to this Request relevant to the statements at issue.

33. All Documents and Communications that support or otherwise relate to any contention that You have suffered monetary or any other damages as a result of the alleged statement by Adam Waldman in June 2020, referenced in Your Counterclaim at paragraph 47, and attached as Exhibit G thereto.

OBJECTION: Defendant and Counterclaim Plaintiff objects to this Request seeking financial information, including seeking documents “otherwise relating to” it, on the grounds that it is vague, ambiguous, and fails to define with particularity the information that it seeks, and is overly broad, unduly burdensome, harassing, and seeks information not reasonably calculated to lead to the discovery of admissible evidence regarding the claims and defenses in this case, taking into account the needs of the case, the amount in controversy, limitations on the parties’ resources, the importance of the discovery in resolving the issues, and critically the Court’s prior rulings defining the scope of relevant discovery in this case quoted in detail below.

On July 24, 2020 the Court ruled that Request No. 14 of Ms. Heard’s 2nd Request for Documents seeking “income from all sources from 2010 to the present” was overbroad because “those types of things aren’t anything that would be helpful in this case,” along with ruling that discovery seeking “outflow, what his expenses are and whether he spends more money than he makes” was overbroad and beyond the scope of relevant discovery in this case. The Court also

ruled that Request 16 of Ms. Heard's 2nd Request for Documents seeking all transactions from January 1, 2010 to the present with a list of individuals was "overly broad" and beyond the scope of discovery in this case unless these individuals were "going to be potential witnesses" in the case.

On September 18, 2020 the Court ruled that Request Nos. 1-6 and 8 of Ms. Heard's 7th Requests for Documents and Request Nos. 1, 3, 5, and 7 of Ms. Heard's 7th Requests seeking financial related documents during the parties' marriage and related to the divorce case was overbroad and beyond the scope of relevant discovery in this case because "its denied under the doctrine of enough is enough. You all have been through the divorce already. We're not going to retry that divorce in this case."

Also on September 18, 2020 the Court specifically defined the narrow scope of relevant tax-return discovery in this case as only requiring "the documents which show the gross income...The supporting documents are not to be produced," and further Ordered that only "the amount of income" from the tax returns is relevant and that only involved "limited parts of [the tax return] that would show the income." The Court reiterated this scope of tax-return discovery on November 20 when it further ruled that only the "return pages" of tax returns needed to be produced, and "the supplementary documents that are attached to" the returns were beyond the scope of relevant discovery in this case. Any other tax-related documents are therefore beyond the scope of relevant discovery in this case.

On November 20, 2020 the Court also ruled that Requests 1-5 of Ms. Heard's 8th Requests for Documents seeking deposition transcripts, pleadings, discovery responses, and document production from four other specific litigations regarding disputes over Mr. Depp's finances were "overly broad [and] burdensome" and beyond the scope of discovery in this case.

Defendant and Counterclaim Plaintiff further objects to this Request because it seeks information protected by the attorney-client privilege, and on the grounds that this Request invades protected litigation work product and would require disclosure of core opinion work product and mental impression of counsel, which is prohibited by 4:1(b)(3) of the Rules of the Virginia Supreme Court. Plaintiff and Counterclaim Defendant has not made the requisite showing under the Rules.

RESPONSE: Subject to and without waiving the objections, Defendant and Counterclaim Plaintiff has produced or will produce non-privileged documents in response to this Request relevant to the statements at issue in this case.

34. All Communications between You and/or Your agents, on the one hand, and any film studio or other Person or entity with which You are professionally involved, on the other hand, regarding any of the following topics: (1) Mr. Depp's claims against You in this Action; (2) the U.K. Action; (3) any of the allegedly defamatory statements by Mr. Depp and/or Adam Waldman referenced in Your Counterclaim and/or attached to Your Counterclaim as Exhibits A- H; and (4) any other public statements by Mr. Depp or Adam Waldman regarding You.

OBJECTION: Defendant and Counterclaim Plaintiff objects to this Request seeking documents "regarding" these broad topics on the grounds that it is vague, ambiguous, and fails to define with particularity the information that it seeks, and is overly broad, unduly burdensome, harassing, and seeks information not reasonably calculated to lead to the discovery of admissible evidence regarding the claims and defenses in this case, taking into account the needs of the case, the amount in controversy, limitations on the parties' resources, the importance of the discovery in resolving the issues, and critically the Court's prior rulings defining the scope of relevant discovery in this case quoted in detail below.

On December 18, 2020, the Court ruled that Request 51 of Mr. Depp's 3rd Requests for Documents seeking all communications between Ms. Heard and anyone relating to her

relationship with Mr. Depp, claims of abuse or violence involving Mr. Depp, and injuries Ms. Heard contends she suffered as a result of Mr. Depp's conduct was overbroad, and therefore beyond the scope of discovery in this case. The Court also ruled that Request 52 of Mr. Depp's 3rd Requests for Documents seeking all documents and communications relating to Ms. Heard's "relationship with Mr. Depp" was also overbroad, and therefore beyond the scope of discovery in this case.

Defendant and Counterclaim Plaintiff further objects to this Request because on November 20, 2020 the Court ruled that discovery seeking documents "sufficient to reflect the impact" of the UK litigation "on Mr. Depp's reputation and career" was overly broad, unduly burdensome, and unreasonably vague, and therefore beyond the scope of discovery in this case.

On December 18, 2020 the Court also ruled that Request No. 23 of Mr. Depp's 1st Requests for Document and Request 50 of Mr. Depp's 3rd Requests for Documents seeking all documents and communications between Ms. Heard and The Sun/NGN was overbroad, and therefore beyond the scope of relevant discovery in this case. The Court also ruled that Request No. 51 of Mr. Depp's 3rd Requests for Documents seeking all documents and communications relating to the UK Action was also overbroad, and therefore beyond the scope of relevant discovery in this case.

Defendant and Counterclaim Plaintiff further objects to this Request as overly broad, unduly burdensome, and seeking information not reasonably calculated to lead to the discovery of admissible evidence regarding the claims and defenses in this case, based on the Court's January 4, 2021 ruling on the *demurrer* and plea in bar dismissing certain allegations from the Counterclaim.

Defendant and Counterclaim Plaintiff further objects to this Request because it seeks information protected by the attorney-client privilege, and on the grounds that this Request invades protected litigation work product and would require disclosure of core opinion work product and mental impression of counsel, which is prohibited by 4:1(b)(3) of the Rules of the Virginia Supreme Court. Plaintiff and Counterclaim Defendant has not made the requisite showing under the Rules.

RESPONSE: Subject to and without waiving the objections, Defendant and Counterclaim Plaintiff stands on her objections to this Request.

35. All Communications between You and Bianca Butti regarding Your allegations of violence or abuse against Mr. Depp.

OBJECTION: Defendant and Counterclaim Plaintiff objects to this Request on the grounds that it is vague, ambiguous, and fails to define with particularity the information that it seeks, and is overly broad, unduly burdensome, harassing, and seeks information not reasonably calculated to lead to the discovery of admissible evidence regarding the claims and defenses in this case, taking into account the needs of the case, the amount in controversy, limitations on the parties' resources, the importance of the discovery in resolving the issues, and critically the Court's prior rulings defining the scope of relevant discovery in this case quoted in detail below.

On December 18, 2020, the Court ruled that Request No. 42 of Mr. Depp's 3rd Request for Documents seeking all communications between Ms. Heard and Bianca Butti relating to Ms. Heard's relationship with Mr. Depp, this litigation, the divorce litigation, the UK action, claims of abuse or violence involving Mr. Depp, and injuries Ms. Heard contended she suffered due to Mr. Depp's conduct was overbroad, and therefore beyond the scope of relevant discovery in this case.

The Court also ruled on December 18, 2020 that Request 51 of Mr. Depp's 3rd Requests for Documents seeking all communications between Ms. Heard and anyone relating to claims of abuse or violence involving Mr. Depp, and injuries Ms. Heard contends she suffered as a result of Mr. Depp's conduct was overbroad, and therefore beyond the scope of discovery in this case. The Court also ruled that Request 52 of Mr. Depp's 3rd Requests for Documents seeking all documents and communications relating to Ms. Heard's "relationship with Mr. Depp" was also overbroad, and therefore beyond the scope of discovery in this case.

RESPONSE: Subject to and without waiving the objections, Defendant and Counterclaim Plaintiff stands on her objections to this Request.

36. All Communications between You and any other Person, other than Your attorneys, regarding Your allegations of violence or abuse against Mr. Depp.

OBJECTION: Defendant and Counterclaim Plaintiff objects to this Request seeking documents regarding allegations in the Counterclaim on the grounds that it is vague, ambiguous, and fails to define with particularity the information that it seeks, and is overly broad, unduly burdensome, harassing, and seeks information not reasonably calculated to lead to the discovery of admissible evidence regarding the claims and defenses in this case, taking into account the needs of the case, the amount in controversy, limitations on the parties' resources, the importance of the discovery in resolving the issues, and critically the Court's prior rulings defining the scope of relevant discovery in this case quoted in detail below.

On December 18, 2020, the Court ruled that Request 51 of Mr. Depp's 3rd Requests for Documents seeking all communications between Ms. Heard and anyone relating to claims of abuse or violence involving Mr. Depp and injuries Ms. Heard contends she suffered as a result of Mr. Depp's conduct was overbroad, and therefore beyond the scope of discovery in this case.

The Court also ruled that Request 52 of Mr. Depp's 3rd Requests for Documents seeking all documents and communications relating to Ms. Heard's "relationship with Mr. Depp" was also overbroad, and therefore beyond the scope of discovery in this case.

Defendant and Counterclaim Plaintiff further objects to this Request because it seeks information protected by the attorney-client privilege, and on the grounds that this Request invades protected litigation work product and would require disclosure of core opinion work product and mental impression of counsel, which is prohibited by 4:1(b)(3) of the Rules of the Virginia Supreme Court. Plaintiff and Counterclaim Defendant has not made the requisite showing under the Rules.

RESPONSE: Subject to and without waiving the objections, Defendant and Counterclaim Plaintiff stands on her objections to this Request.

37. All Documents and Communications that refer, reflect, or relate to the impact that Your purported donation of the proceeds of Your settlement with Mr. Depp to charity had on Your reputation and career.

OBJECTION: Defendant and Counterclaim Plaintiff objects to this Request, including seeking documents "relating to," on the grounds that it is vague, ambiguous, and fails to define with particularity the information that it seeks, and is overly broad, unduly burdensome, harassing, and seeks information not reasonably calculated to lead to the discovery of admissible evidence regarding the claims and defenses in this case, taking into account the needs of the case, the amount in controversy, limitations on the parties' resources, the importance of the discovery in resolving the issues, and critically the Court's prior rulings defining the scope of relevant discovery in this case quoted in detail below.

On December 18, 2020, the Court narrowly defined the scope of discovery regarding charitable donations for this case as only applying to "the \$7 million donation or pledge" and

“that specific donation,” and held that related discovery seeking “how she spent her money and those types of things” was beyond the scope of discovery in this case. As part of this ruling, the court therefore ruled that Request 47 seeking all communications between Ms. Heard and anyone regarding any of her charitable donations and Request 46 seeking documents evidencing what Ms. Heard did with the divorce settlement funds beyond any that were donated to charity (both from Mr. Depp’s 3rd Requests for Documents) were beyond the scope of discovery in this case.

Defendant and Counterclaim Plaintiff further objects to this Request because it seeks information protected by the attorney-client privilege, and on the grounds that this Request invades protected litigation work product and would require disclosure of core opinion work product and mental impression of counsel, which is prohibited by 4:1(b)(3) of the Rules of the Virginia Supreme Court. Plaintiff and Counterclaim Defendant has not made the requisite showing under the Rules.

RESPONSE: Subject to and without waiving the objections, Defendant and Counterclaim Plaintiff stands on her objections to this Request.

38. All Documents and Communications that refer, reflect, or relate to any and all publicity arising from Your divorce from Mr. Depp, including but not limited to any publicity associated with Your public claims to have donated the entirety of the proceeds of the divorce settlement to charity.

OBJECTION: Defendant and Counterclaim Plaintiff objects to this Request seeking financial information, including seeking documents “relating to” it, on the grounds that it is vague, ambiguous, and fails to define with particularity the information that it seeks, and is overly broad, unduly burdensome, harassing, and seeks information not reasonably calculated to lead to the discovery of admissible evidence regarding the claims and defenses in this case, taking into account the needs of the case, the amount in controversy, limitations on the parties’

resources, the importance of the discovery in resolving the issues, and critically the Court's prior rulings defining the scope of relevant discovery in this case quoted in detail below.

On September 18, 2020 the Court ruled that Request Nos. 1-6 and 8 of Ms. Heard's 7th Requests for Documents and Request Nos. 1, 3, 5, and 7 of Ms. Heard's 7th Requests seeking financial related documents during the parties' marriage and related to the divorce case was overbroad and beyond the scope of relevant discovery in this case because "its denied under the doctrine of enough is enough. You all have been through the divorce already. We're not going to retry that divorce in this case."

On November 20, 2020 the Court also ruled that Requests 1-5 of Ms. Heard's 8th Requests for Documents seeking deposition transcripts, pleadings, discovery responses, and document production from four other specific litigations regarding disputes over Mr. Depp's finances were "overly broad [and] burdensome" and beyond the scope of discovery in this case.

On December 18, 2020, the Court narrowly defined the scope of discovery regarding charitable donations for this case as only applying to "the \$7 million donation or pledge" and "that specific donation," and held that related discovery seeking "how she spent her money and those types of things" was beyond the scope of discovery in this case. As part of this ruling, the court therefore ruled that Request 47 seeking all communications between Ms. Heard and anyone regarding any of her charitable donations and Request 46 seeking documents evidencing what Ms. Heard did with the divorce settlement funds beyond any that were donated to charity (both from Mr. Depp's 3rd Requests for Documents) were beyond the scope of discovery in this case.

Defendant and Counterclaim Plaintiff further objects to this Request because it seeks information protected by the attorney-client privilege, and on the grounds that this Request invades protected litigation work product and would require disclosure of core opinion work

product and mental impression of counsel, which is prohibited by 4:1(b)(3) of the Rules of the Virginia Supreme Court. Plaintiff and Counterclaim Defendant has not made the requisite showing under the Rules.

RESPONSE: Subject to and without waiving the objections, Defendant and Counterclaim Plaintiff stands on her objections to this Request.

39. All Documents and Communications that refer, reflect, or relate to any anonymous donations made on Your behalf on in Your name to the Children’s Hospital, Los Angeles, from January 1, 2016 to present.

OBJECTION: Defendant and Counterclaim Plaintiff objects to this Request, including seeking documents “relating to,” on the grounds that it is vague, ambiguous, and fails to define with particularity the information that it seeks, and is overly broad, unduly burdensome, harassing, and seeks information not reasonably calculated to lead to the discovery of admissible evidence regarding the claims and defenses in this case, taking into account the needs of the case, the amount in controversy, limitations on the parties’ resources, the importance of the discovery in resolving the issues, and critically the Court’s prior rulings defining the scope of relevant discovery in this case quoted in detail below.

On December 18, 2020, the Court narrowly defined the scope of discovery regarding charitable donations for this case as only applying to “the \$7 million donation or pledge” and “that specific donation,” and held that related discovery seeking “how she spent her money and those types of things” was beyond the scope of discovery in this case. As part of this ruling, the court therefore ruled that Request 47 seeking all communications between Ms. Heard and anyone regarding any of her charitable donations and Request 46 seeking documents evidencing what Ms. Heard did with the divorce settlement funds beyond any that were donated to charity (both from Mr. Depp’s 3rd Requests for Documents) were beyond the scope of discovery in this case.

Defendant and Counterclaim Plaintiff further objects to this Request because it seeks information protected by the attorney-client privilege, and on the grounds that this Request invades protected litigation work product and would require disclosure of core opinion work product and mental impression of counsel, which is prohibited by 4:1(b)(3) of the Rules of the Virginia Supreme Court. Plaintiff and Counterclaim Defendant has not made the requisite showing under the Rules.

RESPONSE: Subject to and without waiving the objections, Defendant and Counterclaim Plaintiff has produced documents in response to this Request identifying the amounts donated on her behalf to Children’s Hospital, Los Angeles. Defendant and Counterclaim Plaintiff otherwise stands on her objections to this Request.

40. All Documents and Communications that refer, reflect, or relate to any anonymous donations made on Your behalf on in Your name to the American Civil Liberties Union, from January 1, 2016 to present.

OBJECTION: Defendant and Counterclaim Plaintiff objects to this Request, including seeking documents “relating to,” on the grounds that it is vague, ambiguous, and fails to define with particularity the information that it seeks, and is overly broad, unduly burdensome, harassing, and seeks information not reasonably calculated to lead to the discovery of admissible evidence regarding the claims and defenses in this case, taking into account the needs of the case, the amount in controversy, limitations on the parties’ resources, the importance of the discovery in resolving the issues, and critically the Court’s prior rulings defining the scope of relevant discovery in this case quoted in detail below.

On December 18, 2020, the Court narrowly defined the scope of discovery regarding charitable donations for this case as only applying to “the \$7 million donation or pledge” and “that specific donation,” and held that related discovery seeking “how she spent her money and

those types of things” was beyond the scope of discovery in this case. As part of this ruling, the court therefore ruled that Request 47 seeking all communications between Ms. Heard and anyone regarding any of her charitable donations and Request 46 seeking documents evidencing what Ms. Heard did with the divorce settlement funds beyond any that were donated to charity (both from Mr. Depp’s 3rd Requests for Documents) were beyond the scope of discovery in this case.

Defendant and Counterclaim Plaintiff further objects to this Request because it seeks information protected by the attorney-client privilege, and on the grounds that this Request invades protected litigation work product and would require disclosure of core opinion work product and mental impression of counsel, which is prohibited by 4:1(b)(3) of the Rules of the Virginia Supreme Court. Plaintiff and Counterclaim Defendant has not made the requisite showing under the Rules.

RESPONSE: Subject to and without waiving the objections, Defendant and Counterclaim Plaintiff has produced documents in response to this Request identifying the amounts donated on her behalf to the ACLU. Defendant and Counterclaim Plaintiff otherwise stands on her objections to this Request.

41. All Documents and Communications that refer, reflect, or relate to any anonymous donations made on Your behalf from January 1, 2016 to present.

OBJECTION: Defendant and Counterclaim Plaintiff objects to this Request, including seeking documents “relating to,” on the grounds that it is vague, ambiguous, and fails to define with particularity the information that it seeks, and is overly broad, unduly burdensome, harassing, and seeks information not reasonably calculated to lead to the discovery of admissible evidence regarding the claims and defenses in this case, taking into account the needs of the case, the amount in controversy, limitations on the parties’ resources, the importance of the discovery

in resolving the issues, and critically the Court's prior rulings defining the scope of relevant discovery in this case quoted in detail below.

On December 18, 2020, the Court narrowly defined the scope of discovery regarding charitable donations for this case as only applying to "the \$7 million donation or pledge" and "that specific donation," and held that related discovery seeking "how she spent her money and those types of things" was beyond the scope of discovery in this case. As part of this ruling, the court therefore ruled that Request 47 seeking all communications between Ms. Heard and anyone regarding any of her charitable donations and Request 46 seeking documents evidencing what Ms. Heard did with the divorce settlement funds beyond any that were donated to charity (both from Mr. Depp's 3rd Requests for Documents) were beyond the scope of discovery in this case.

Defendant and Counterclaim Plaintiff further objects to this Request because it seeks information protected by the attorney-client privilege, and on the grounds that this Request invades protected litigation work product and would require disclosure of core opinion work product and mental impression of counsel, which is prohibited by 4:1(b)(3) of the Rules of the Virginia Supreme Court. Plaintiff and Counterclaim Defendant has not made the requisite showing under the Rules.

RESPONSE: Subject to and without waiving the objections, Defendant and Counterclaim Plaintiff stands on her objections to this Request.

42. Documents sufficient to show whether and when You donated any portion of the settlement proceeds from the Divorce Action to charity, to the extent not previously produced.

OBJECTION: Defendant and Counterclaim Plaintiff objects to this Request seeking financial information, including seeking documents "relating to" it, on the grounds that it is vague, ambiguous, and fails to define with particularity the information that it seeks, and is

overly broad, unduly burdensome, harassing, and seeks information not reasonably calculated to lead to the discovery of admissible evidence regarding the claims and defenses in this case, taking into account the needs of the case, the amount in controversy, limitations on the parties' resources, the importance of the discovery in resolving the issues, and critically the Court's prior rulings defining the scope of relevant discovery in this case quoted in detail below.

On December 18, 2020, the Court narrowly defined the scope of discovery regarding charitable donations for this case as only applying to "the \$7 million donation or pledge" and "that specific donation," and held that related discovery seeking "how she spent her money and those types of things" was beyond the scope of discovery in this case. As part of this ruling, the court therefore ruled that Request 47 seeking all communications between Ms. Heard and anyone regarding any of her charitable donations and Request 46 seeking documents evidencing what Ms. Heard did with the divorce settlement funds beyond any that were donated to charity (both from Mr. Depp's 3rd Requests for Documents) were beyond the scope of discovery in this case.

Defendant and Counterclaim Plaintiff further objects to this Request because it seeks information protected by the attorney-client privilege, and on the grounds that this Request invades protected litigation work product and would require disclosure of core opinion work product and mental impression of counsel, which is prohibited by 4:1(b)(3) of the Rules of the Virginia Supreme Court. Plaintiff and Counterclaim Defendant has not made the requisite showing under the Rules.

RESPONSE: Subject to and without waiving the objections, please refer to the Defendant and Counterclaim Plaintiff's response and document production to Request Nos. 39-40 of these 4th Requests for Production of Documents. Defendant and Counterclaim Plaintiff otherwise stands on her objections to this Request.

43. All Documents and Communications that evidence or reflect any damages alleged or sought by You in Your Counterclaim in this Action.

OBJECTION: Defendant and Counterclaim Plaintiff objects to this Request seeking financial information on the grounds that it is vague, ambiguous, and fails to define with particularity the information that it seeks, and is overly broad, unduly burdensome, harassing, and seeks information not reasonably calculated to lead to the discovery of admissible evidence regarding the claims and defenses in this case, taking into account the needs of the case, the amount in controversy, limitations on the parties' resources, the importance of the discovery in resolving the issues, and critically the Court's prior rulings defining the scope of relevant discovery in this case quoted in detail below.

On July 24, 2020 the Court ruled that Request No. 14 of Ms. Heard's 2nd Request for Documents seeking "income from all sources from 2010 to the present" was overbroad because "those types of things aren't anything that would be helpful in this case," along with ruling that discovery seeking "outflow, what his expenses are and whether he spends more money than he makes" was overbroad and beyond the scope of relevant discovery in this case. The Court also ruled that Request 16 of Ms. Heard's 2nd Request for Documents seeking all transactions from January 1, 2010 to the present with a list of individuals was "overly broad" and beyond the scope of discovery in this case unless these individuals were "going to be potential witnesses" in the case.

On September 18, 2020 the Court ruled that Request Nos. 1-6 and 8 of Ms. Heard's 7th Requests for Documents and Request Nos. 1, 3, 5, and 7 of Ms. Heard's 7th Requests seeking financial related documents during the parties' marriage and related to the divorce case was overbroad and beyond the scope of relevant discovery in this case because "its denied under the

doctrine of enough is enough. You all have been through the divorce already. We're not going to retry that divorce in this case."

Also on September 18, 2020 the Court specifically defined the narrow scope of relevant tax-return discovery in this case as only requiring "the documents which show the gross income...The supporting documents are not to be produced," and further Ordered that only "the amount of income" from the tax returns is relevant and that only involved "limited parts of [the tax return] that would show the income." The Court reiterated this scope of tax-return discovery on November 20 when it further ruled that only the "return pages" of tax returns needed to be produced, and "the supplementary documents that are attached to" the returns were beyond the scope of relevant discovery in this case. Any other tax-related documents are therefore beyond the scope of relevant discovery in this case.

On November 20, 2020 the Court also ruled that Requests 1-5 of Ms. Heard's 8th Requests for Documents seeking deposition transcripts, pleadings, discovery responses, and document production from four other specific litigations regarding disputes over Mr. Depp's finances were "overly broad [and] burdensome" and beyond the scope of discovery in this case.

Defendant and Counterclaim Plaintiff further objects to this Request because it seeks information protected by the attorney-client privilege, and on the grounds that this Request invades protected litigation work product and would require disclosure of core opinion work product and mental impression of counsel, which is prohibited by 4:1(b)(3) of the Rules of the Virginia Supreme Court. Plaintiff and Counterclaim Defendant has not made the requisite showing under the Rules.

RESPONSE: Subject to and without waiving the objections, Defendant and Counterclaim Plaintiff has produced or will produce non-privileged documents in response to this Request relevant to the statements at issue.

AS TO OBJECTIONS:

/S/ DAVID E. MURPHY

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CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing was served this 19th day of January 2021, by email, by agreement of the parties, addressed as follows:

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*Counsel for Plaintiff/Counterclaim
Defendant John C. Depp, II*

/S/ DAVID E. MURPHY
David E. Murphy (VSB No. 90938)

Exhibit 3

Suda, Casey

From: Vasquez, Camille M.
Sent: Monday, January 25, 2021 6:00 PM
To: Elaine Bredehoft; Ben Rottenborn; jtreece@woodsrogers.com
Cc: Chew, Benjamin G.; Crawford, Andrew C.; Moniz, Samuel A.; Suda, Casey
Subject: Depp/Heard: Request for M&C re Heard's Responses to Depp's Fourth RFPs

All,

We have reviewed Ms. Heard's responses and objections to Mr. Depp's Fourth RFPs, and have concluded that they are entirely inadequate, indicating a complete failure to engage in good faith with Ms. Heard's discovery obligations.

Please allow the following to briefly summarize some of the defects in Ms. Heard's non-responses:

- As an initial matter, we note that all of the RFP responses are preceded by improper and inapplicable boilerplate objections. In addition, Ms. Heard represented that responsive documents would be produced in response to a number of requests, but has so far failed to do so. Please confirm that documents will be produced within one week of today's date.
- We also note that even on those RFPs where Ms. Heard agrees to produce responsive documents, she has improperly qualified the scope of her production with the language "relevant to the statements at issue." The scope of discovery in Virginia is broader than pure relevance, and includes documents that are "reasonably calculated to lead to the discovery of admissible evidence." Va. R. S. Ct. 4:1. Moreover, the subject matter of this action is broader than whatever "statements" Ms. Heard deems to be "at issue," and includes her reputation, career prospects, and the truthfulness of her allegations of abuse against Mr. Depp. To the extent that any responsive, non-privileged documents are being withheld on the basis of this qualifying language, that is improper. See, RFP Nos. 9, 11, 12, 13, 14, 16, 18, 20, 22, 24, 26, 28, 29, 30, 31, 32, 33.
- RFP No. 2 seeks documents reflecting projects for which Ms. Heard was considered and rejected, from 2010 to present. Ms. Heard represented that she would only producing responsive documents *after* April 8, 2020. That is not an acceptable timeframe. Mr. Depp is entitled to evaluate Ms. Heard's career prospects and success before April 8, 2020, in order to evaluate whether there has been a decline after April 8, 2020. The relevance of the earlier information to a damages analysis is sufficiently obvious that it hardly needs to be stated. Please confirm that you will immediately produce all responsive documents from 2010 to present.
- RFP No. 3 and 4 seek documents and contracts reflecting Ms. Heard's compensation from projects performed in her professional capacity. This is obviously relevant to a damages analysis in assessing the plausibility of Ms. Heard's \$100 million Counterclaim. Ms. Heard improperly stands on boilerplate objections.
- RFP Nos. 5, 6, 7, 8, 10 seek documents reflecting the impact of the Depp/Heard relationship, divorce, litigation, and abuse allegations on Ms. Heard's reputation and career. Ms. Heard served blanket objections. By filing a \$100 million Counterclaim, Ms. Heard put her reputation and career prospects at issue. Mr. Depp is entitled to explore the impact of each of these events on Ms. Heard's career and reputation, to evaluate, inter alia, the relative impact of the purportedly defamatory statements alleged in Ms. Heard's Counterclaim. and Ms. Heard must produce responsive documents.
- RFP No. 15 seeks documents related to the domestic violence restraining order referenced in Ms. Heard's Counterclaim. Ms. Heard asserted blanket objections, but the relevance of this topic to the parties' dispute is obvious.

- RFP No. 17 seeks documents related to any contention that Ms. Heard suffered damages as a result of statements by Mr. Depp. To state the obvious, Ms. Heard put the status of her reputation at issue by filing her Counterclaim, and Mr. Depp is entitled to evaluate the relative damages alleged to have been caused by particular statements. Ms. Heard's blanket objections are patently improper.
- RFP No. 19 seeks documents and communications regarding the op-ed published in the Washington Post that is at issue in this action. Incredibly, Ms. Heard is standing on her improper objections in response to this request.
- RFP No. 21, 23, 25, 27, seek documents supporting any claim that Ms. Heard suffered damages from the statements alleged in her Counterclaim. Ms. Heard is improperly standing on objections.
- RFP No. 34 seeks documents and communications between Ms. Heard and film studios and other entities with which she is involved, regarding Mr. Depp's claims in this action, the UK Action, the alleged statements by Mr. Depp and/or Mr. Waldman alleged in the Counterclaim, and public statements by Mr. Depp and/or Mr. Waldman regarding Ms. Heard. The relevance of these topic areas to a damages analysis is obvious. Having asserted a \$100 million Counterclaim, Ms. Heard cannot plausibly resist discovery that seeks communications relevant to the basis of that claim.
- RFP No. 34 seeks communications between Ms. Heard and Bianca Butti regarding her claims of violence against Mr. Depp, and RFP No. 35 seeks non-privileged communications with other persons regarding the same. These RFPs go to a core issue in this case, and Ms. Heard's assertion of blanket objections is nothing short of outrageous.
- RFP Nos. 37 and 38 seek documents evidencing publicity Ms. Heard received from her public claims to have donated the proceeds of her settlement with Mr. Depp. Ms. Heard has put these matters at issue, including by testifying in the U.K. proceeding that she could not have been financially motivated in accusing Mr. Depp of abuse, because she supposedly had kept none of the proceeds. Mr. Depp contends that Ms. Heard sought to have her cake and eat it too—falsely accusing Mr. Depp of abuse to strengthen her position in the divorce action, while simultaneously falsely representing to the public (and later the Court) that she was not keeping the money. As such, these documents go directly to Ms. Heard's motives and veracity, and has already been determined by multiple courts to be relevant.
- RFP Nos. 39-41 seek documents relevant to Ms. Heard's anonymous donor, and is relevant for the same reasons.
- RFP No. 42 seeks document sufficient to show whether and when MS. Heard made her alleged donations and is relevant for the same reasons as 37/38, above.

Please provide a date and date early this week to meet and confer, in advance of our bringing a motion to compel and for sanctions.

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