

Ms. Heard has again filed a gratuitous motion, wasting the Court's resources. This time she pushes an open door, seeking an Order for Mr. Depp to appear for deposition, to which he has agreed to do after he completes shooting of "Fantastic Beasts 3" in London, several weeks prior to the close of discovery. Requiring Mr. Depp to disrupt the shooting, which involves 750 people, and to make what would be unnecessary round-trip flights between London and Virginia during the COVID pandemic, as Ms. Heard irresponsibly requests, would also endanger Mr. Depp's health, and that of everyone with whom he would come into contact. And Mr. Depp is producing herewith all documents responsive to Ms. Heard's 9th set of RFA's, even though these documents are not germane to any issue in the case. Indeed, those documents appear to show that Ms. Heard's counsel lacked candor in describing her communications with Warner Bros. in-house attorneys relating to Ms. Heard's potential schedule for another film to be produced by that studio. As set forth below, the Court should deny both of Ms. Heard's improper requests for relief.

The Court Should Deny Both of Defendant's Motions

1. Mr. Depp Agrees to Sit for Two Days of Deposition in March 2021, Several Weeks Before the Close of Discovery on April 16, 2021

A. Plaintiff Is Contractually Obligated to Remain in London through Mid-February 2021

On August 7, 2020, without any prior consultation with Plaintiff's counsel, Ms. Heard unilaterally propounded a notice of deposition to Mr. Depp, demanding that he physically appear for five days of deposition in Virginia from October 4 through October 9, 2020. We apprised Defendant's counsel that five days would be excessive, especially given that Mr. Depp recently testified for several days in London on the very same subject, and that the parties would have to agree to mutually convenient dates from both Mr. Depp's and Ms. Heard's depositions, which

should be the same length. Three days later, on August 10, Ms. Heard filed her three-count Counterclaims against Plaintiff seeking \$100 million in damages, to which Mr. Depp has demurred.

On August 19, Warner Bros. first apprised Mr. White's manager Edward White, principal of the CPA firm Edward White & Co., that the shooting of "Fantastic Beasts 3," long delayed by COVID, would commence in London in early October 2020:

Pursuant to the Agreements between Company and L.R.D. Productions ("Lender") f/s/o Johnny Depp ("Artist"), Artist is currently scheduled to render service on the Picture in London on an exclusive basis commencing in early October 2020, and running through and including the middle of February, 2021.¹

Exhibit A (Letter from Glenn A. Eckerle, Senior Vice President, Legal Affairs), Warner Bros. Pictures, dated August 19, 2020 (emphasis added).

Undersigned counsel *immediately* informed Ms. Heard's counsel of Mr. Depp's mandatory contractual obligation to Warner Bros., providing her a copy of Mr. Eckerle's letter, and sought her agreement to Mr. Depp's forthcoming motion to continue the January 11, 2020 trial date, with which the shooting conflicted. **Exhibit B.** Ms. Bredehoff then called Mr. Eckerle and apparently had a telephone conversation with him and his Warner Bros. colleague Wayne M. Smith, Esq. Ms. Heard ultimately filed an opposition to Mr. Depp's continuance motion, and served her ninth set of RFP's, demanding all of Mr. Depp's communications with Warner Bros., to which Plaintiff properly objected as not germane to any issues in the case.

¹ L.R.D. Productions is one of Mr. Depp's three loan-out companies for which he has provided financial information in this case, including redacted page one of Forms 1120S for all three entities, which Plaintiff produced to Ms. Heard on September 30, 2020.

Mr. Eckerle's August 19 letter proved to be spot-on accurate, as Mr. Depp's mandatory two-week London quarantine begins on October 3, 2020, and shooting of "Fantastic Beasts 3" will commence on October 19, proceeding through mid-February 2021.

B. The Logistics of Mr. Depp's Returning This Month Would Be Impractical

Ms. Heard's motion to compel that Mr. Depp sit for deposition prior to October 30 is improper because she, as an actress who works for the same studio, Warner Bros., which produces the "Aquaman" series, knows that Mr. Depp has a strict, exclusive engagement that would not allow him to travel from London to Virginia to prepare for, and participate, in a two- or three-day deposition in Virginia. The "Fantastic Beasts 3" shooting in London involves 750 people in addition to Mr. Depp, who plays the lead role (Gellert Grindelwald) in the film. Even if Mr. Depp's contractual obligations permitted him to leave for several days in the middle of shooting – they do not – the logistics would be impracticable. Shooting would have to shut down for a few weeks, as, upon his returning from Virginia, U.K. law would require Mr. Depp to quarantine *again* for 14 days. See <https://uk.usembassy.gov/covid-19-coronavirus-information/>.

Exhibit C.²

2. Nothing Requires Expedition Here

Ms. Heard already knows **exactly** what Mr. Depp will say at his disposition because he submitted seven detailed witness statements – responding to Ms. Heard's ever-shifting testimony - in the *Sun* case. Moreover, the *Sun*'s Q.C. Sasha Wass cross examined Mr. Depp for three full days (July 7 – July 10, 2021) on precisely the same subject matter at issue here. Finally, the trial judge, Sir Andrew George Lindsay Nichol, questioned Mr. Depp both during Q.C. Wass's cross

² The United States is not in the travel corridor of countries excused from the 14-day quarantine requirement. *Id.*

examination, and during Mr. Depp's one-day re-examination by his U.K. counsel David Sherborne.³ Virtually all of the other deposition witnesses in this case also testified at the *Sun* trial, so there would be no prejudice whatsoever to Ms. Heard in taking Mr. Depp's deposition in March 2021, still weeks before the close of discovery. Ms. Heard and Ms. Bredehoft attended the *entire* three-week trial and have all of the trial transcripts and trial bundles.

Trial is still 7 and 1/2 months away, and Mr. Depp's demurrer to Defendant's recently filed Counterclaims has yet to be heard. No exigency exists which might justify requiring Mr. Depp to return in the middle of shooting, especially in that it would halt a huge production for the better part of a month, given U.K. quarantine requirements. Ordering Mr. Depp to make unnecessary round-trip between London and Virginia would also present health risks to Mr. Depp and those with whom he comes into contact.⁴

3. The Court Should Deny Defendant's Motion on Her Ninth RFP's as Moot

These RFP's demanded all correspondence between Mr. Depp and Warner Bros. relating to the shooting schedule for "Fantastic Beasts 3" and were never relevant to any issue in this case, especially after Plaintiff's motion for trial continuance was mooted by the Court's own initiative continuing the trial date to May 17, 2020. But to spare further time and resources, Mr. Depp submits herewith all responsive documents. *See Exhibit D* (DEPP 00018405 – DEPP 00018416).

Mr. Depp's travel to the San Sebastian and Zurich Film Festivals in late September, Defendant's Br. at p. 4, is a *non sequitur*, as that was fully consistent with the time frame set

³ The Honorable Mr. Justice Nichol took the case under advisement after the bench trial.

⁴ In fairness, Mr. Depp would agree not to take Ms. Heard's deposition until March 2021.

forth in Mr. Eckerle's letter, and Mr. Depp is returning to London by the October 3 deadline.⁵ Ms. Heard's disparaging remark, Defendant's Br. at p. 2, concerning Mr. Smith's letter of September 8, 2020, *see Exhibit D* (DEPP 00018416-last page of **Exhibit D**), which referenced a return to London by September 17, is misplaced. As the correspondence set forth in **Exhibit D** shows, the purpose of Mr. Smith's letter was not to lay out Mr. Depp's mandatory schedule, which Mr. Eckerle had already done in his earlier letter to Mr. White, *see Exhibit A*, but rather to correct Ms. Heard's misstatement to the Court in her brief in opposition to Plaintiff's Motion for Continuance:

Warner Bros. counsel said they do not know when *Aquaman 2* will begin filming, **but it will be sometime in the Spring of 2021, which is also a basis for denying the continuance - ...**

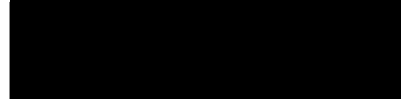
Ms. Heard's Brief (September 4, 2020) at p. 2 (emphasis added). Upon reading that misstatement, Mr. Smith decided to correct the record. In the September 8 Letter, Mr. Smith states what he *actually* told Ms. Bredehoff: "As to *Aquaman 2*, that film will **not** start production any earlier than May 31, 2020." **Exhibit D** (DEPP 00018416) (emphasis added).

Conclusion

Based on the aforesaid, the Court should deny Defendant's latest motion.

⁵ Mr. Depp produced "Crock of Gold," a documentary about musician Shane McGowan, which won the Special Jury Prize in San Sebastian, and was featured at Zurich as well.

Respectfully submitted,



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Counsel for Plaintiff John C. Depp, II

Dated: October 2, 2020

Chew, Benjamin G.

From: Edward White <ewhite@ewccpas.com>
Sent: Wednesday, August 19, 2020 5:32 PM
To: Chew, Benjamin G.
Cc: Vasquez, Camille M.; Larry Leavitt
Subject: Fantastic Beasts 3 / Johnny Depp
Attachments: E.White.8.19.20.ltr.pdf

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

Dear Ben,

Please review the following e-mail letter I received from Warner Bros. and the related attachment. In response to your inquiry, today is the first day that Warner Bros. informed me of Mr. Depp's requirements and the commencement date for his services.

Best regards,

Ed

Edward White
Edward White & Co., LLP
Certified Public Accountants

Warner Center Towers
21700 Oxnard Street, Suite 400
Woodland Hills, California 91367
Telephone: 818-716-1120
Facsimile: 818-716-2670

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From: Eckerle, Glenn <Glenn.Eckerle@warnerbros.com>
Sent: Wednesday, August 19, 2020 2:24 PM
To: Edward White <ewhite@ewccpas.com>; Larry Leavitt <lleavitt@ewccpas.com>
Cc: Levinson, Jodi <Jodi.Levinson@warnerbros.com>; Bryan Lourd <blourd@caa.com>; Sheldon Sroloff, Esq.

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A

(SSroloff@caa.com) <SSroloff@caa.com>; McCorry, Nigel <Nigel.McCorry@warnerbros.com>; Breard, Margaret <Margaret.Breard@warnerbros.com>

Subject: Fantastic Beasts 3 / Johnny Depp

Hi,

Per your request, please see the attached letter regarding Mr. Depp's schedule on Fantastic Beasts 3.

Please also note that an estimated 750 individuals will be working on the Picture.

Best,

Glenn

Glenn A. Eckerle
Senior Vice President, Legal Affairs
Warner Bros. Pictures
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Phone: (818) 954-4911 | Fax: (818) 954-3490
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WARNER BROS.
PICTURES

Glenn A. Eckerle
Senior Vice President, Legal Affairs

August 19, 2020

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

BY EMAIL

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

Dear Edward:

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

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

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

Very truly yours,

Glenn A. Eckerle

cc: Lawrence Leavitt (all by email)
Bryan Lourd
Sheldon Sroloff
Jodi Levinson
Nigel McCorry

A Division of WB Studio Enterprises Inc.
A Warner Bros. Entertainment Company
4000 Warner Boulevard, Burbank, California 91522
(818) 954-4911 • Fax: (818) 954-3490 • glenn.eckerle@warnerbros.com

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DEPP00018407

Chew, Benjamin G.

From: Chew, Benjamin G.
Sent: Wednesday, August 19, 2020 6:29 PM
To: 'Elaine Bredehoft'
Cc: Vasquez, Camille M.; Crawford, Andrew C.; brottenborn@woodsrogers.com; Joshua Treece; Adam Nadelhaft; David Murphy; Leslie Hoff; Michelle Bredehoft
Subject: Request for Meet and Confer re 1) Consent Order respecting Rule 3:25(D) Attorneys' fees and costs award; and 2) Mr. Depp's Forthcoming Motion to Continue the Current Trial Date

Good evening, Elaine,

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

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

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

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

Best regards,

Ben

brownrudnick

Benjamin G. Chew
Partner

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4. Aviation passenger experience (<https://www.gov.uk/transport/aviation-passenger-experience>)

Guidance

Coronavirus (COVID-19): travel corridors

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

Published 3 July 2020

Last updated 26 September 2020 — see all updates

From:

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

Applies to:

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

Contents

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- Travel corridor exemption rules
- Arrival in the UK – passenger locator form
- Travelling abroad from the UK – foreign travel advice
- If you have coronavirus symptoms

Stay up to date

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

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

Countries, territories and regions on the travel corridor list

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

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

- Akrotiri and Dhekelia
- Anguilla (<https://www.gov.uk/foreign-travel-advice/anguilla>)
- Antigua and Barbuda (<https://www.gov.uk/foreign-travel-advice/antigua-and-barbuda>)
- Australia (<https://www.gov.uk/foreign-travel-advice/australia>)
- the Azores
- Barbados (<https://www.gov.uk/foreign-travel-advice/barbados>)
- Bermuda (<https://www.gov.uk/foreign-travel-advice/bermuda>)
- Bonaire, St Eustatius and Saba (<https://www.gov.uk/foreign-travel-advice/bonaire-st-eustatius-saba>)
- British Antarctic Territory (<https://www.gov.uk/foreign-travel-advice/british-antarctic-territory>)
- British Indian Ocean Territory
- British Virgin Islands (<https://www.gov.uk/foreign-travel-advice/british-virgin-islands>)
- Brunei (<https://www.gov.uk/foreign-travel-advice/brunei>)
- Cayman Islands (<https://www.gov.uk/foreign-travel-advice/cayman-islands>)
- the Channel Islands
- Cuba (<https://www.gov.uk/foreign-travel-advice/cuba>)
- Cyprus (<https://www.gov.uk/foreign-travel-advice/cyprus>)
- Dominica (<https://www.gov.uk/foreign-travel-advice/dominica>)
- Estonia (<https://www.gov.uk/foreign-travel-advice/estonia>)
- Falkland Islands (<https://www.gov.uk/foreign-travel-advice/falkland-islands>)
- Faroe Islands (<https://www.gov.uk/foreign-travel-advice/denmark>)
- Fiji (<https://www.gov.uk/foreign-travel-advice/fiji>)
- Finland (<https://www.gov.uk/foreign-travel-advice/finland>)
- Gibraltar (<https://www.gov.uk/foreign-travel-advice/gibraltar>)
- Germany (<https://www.gov.uk/foreign-travel-advice/germany>)
- Greece (<https://www.gov.uk/foreign-travel-advice/greece>) (except the islands of Crete, Lesbos, Mykonos, Santorini, Serifos, Tinos and Zakynthos – if you arrive in England from any of these islands you will need to self-isolate (<https://www.gov.uk/government/publications/coronavirus-covid-19-how-to-self-isolate-when-you-travel-to-the-uk/coronavirus-covid-19-how-to-self-isolate-when-you-travel-to-the-uk>))
- Greenland (<https://www.gov.uk/foreign-travel-advice/denmark>)
- Grenada (<https://www.gov.uk/foreign-travel-advice/grenada>)
- Hong Kong (<https://www.gov.uk/foreign-travel-advice/hong-kong>)
- Ireland (<https://www.gov.uk/foreign-travel-advice/ireland>)
- the Isle of Man
- Italy (<https://www.gov.uk/foreign-travel-advice/italy>)
- Japan (<https://www.gov.uk/foreign-travel-advice/japan>)

- Latvia (<https://www.gov.uk/foreign-travel-advice/latvia>)
- Liechtenstein (<https://www.gov.uk/foreign-travel-advice/liechtenstein>)
- Lithuania (<https://www.gov.uk/foreign-travel-advice/lithuania>)
- Macao (Macau) (<https://www.gov.uk/foreign-travel-advice/macao>)
- Madeira
- Malaysia (<https://www.gov.uk/foreign-travel-advice/malaysia>)
- Mauritius (<https://www.gov.uk/foreign-travel-advice/mauritius>)
- Montserrat (<https://www.gov.uk/foreign-travel-advice/montserrat>)
- New Caledonia (<https://www.gov.uk/foreign-travel-advice/new-caledonia>)
- New Zealand (<https://www.gov.uk/foreign-travel-advice/new-zealand>)
- Norway (<https://www.gov.uk/foreign-travel-advice/norway>)
- Pitcairn, Henderson, Ducie and Oeno Islands (<https://www.gov.uk/foreign-travel-advice/pitcairn-island>)
- Poland (<https://www.gov.uk/foreign-travel-advice/poland>)
- San Marino (<https://www.gov.uk/foreign-travel-advice/san-marino>)
- Seychelles (<https://www.gov.uk/foreign-travel-advice/seychelles>)
- Singapore (<https://www.gov.uk/foreign-travel-advice/singapore>) (if you arrived in England from Singapore before 4am 19 September 2020 you will need to self-isolate (<https://www.gov.uk/government/publications/coronavirus-covid-19-how-to-self-isolate-when-you-travel-to-the-uk/coronavirus-covid-19-how-to-self-isolate-when-you-travel-to-the-uk>))
- South Korea (<https://www.gov.uk/foreign-travel-advice/south-korea>)
- South Georgia and the South Sandwich Islands (<https://www.gov.uk/foreign-travel-advice/south-georgia-and-south-sandwich-islands>)
- St Barthélemy (<https://www.gov.uk/foreign-travel-advice/st-martin-and-st-barthelemy>)
- St Helena, Ascension and Tristan da Cunha (<https://www.gov.uk/foreign-travel-advice/st-helena-ascension-and-tristan-da-cunha>)
- St Kitts and Nevis (<https://www.gov.uk/foreign-travel-advice/st-kitts-and-nevis>)
- St Lucia (<https://www.gov.uk/foreign-travel-advice/st-lucia>)
- St Pierre and Miquelon (<https://www.gov.uk/foreign-travel-advice/st-pierre-and-miquelon>)
- St Vincent and the Grenadines (<https://www.gov.uk/foreign-travel-advice/st-vincent-and-the-grenadines>)
- Sweden (<https://www.gov.uk/foreign-travel-advice/sweden>)
- Taiwan (<https://www.gov.uk/foreign-travel-advice/taiwan>)
- Thailand (<https://www.gov.uk/foreign-travel-advice/thailand>) (if you arrived in England from Thailand before 4am 19 September 2020 you will need to self-isolate (<https://www.gov.uk/government/publications/coronavirus-covid-19-how-to-self-isolate-when-you-travel-to-the-uk/coronavirus-covid-19-how-to-self-isolate-when-you-travel-to-the-uk>))
- Turkey (<https://www.gov.uk/foreign-travel-advice/turkey>)
- Vatican City State (<https://www.gov.uk/foreign-travel-advice/italy>)
- Vietnam (<https://www.gov.uk/foreign-travel-advice/vietnam>)

Updates to the travel corridor list

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

Countries, territories or regions removed from the travel corridor list

The following countries and territories were removed from the exempt list at 4am Saturday 26 September 2020:

- Curaçao (<https://www.gov.uk/foreign-travel-advice/curacao>)
- Denmark (<https://www.gov.uk/foreign-travel-advice/denmark>)
- Iceland (<https://www.gov.uk/foreign-travel-advice/iceland>)
- Slovakia (<https://www.gov.uk/foreign-travel-advice/slovakia>)

If you arrive in England from Curaçao, Denmark, Iceland or Slovakia after 4am 26 September, you will need to self-isolate (<https://www.gov.uk/government/publications/coronavirus-covid-19-how-to-self-isolate-when-you-travel-to-the-uk/coronavirus-covid-19-how-to-self-isolate-when-you-travel-to-the-uk>).

If you arrived in England from Curaçao, Denmark, Iceland or Slovakia before 4am 26 September, you may not need to self-isolate. Read the rules about when you need to self-isolate and for how long (<https://www.gov.uk/guidance/coronavirus-covid-19-travel-corridors#travel-corridor-exemption-rules>).

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

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

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

Countries or territories added to the travel corridor list

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

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

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

Travel corridor exemption rules

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

This applies to UK residents and visitors to the UK.

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

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

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

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

Example of when you would need to self-isolate

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

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

Transit stops

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

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

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

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

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

Private vehicles

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

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

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

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

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

Arrival in the UK – passenger locator form

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

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

It applies to UK residents and visitors.

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

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

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

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

Failure to complete the form is a criminal offence.

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

Travelling abroad from the UK – foreign travel advice

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

Before travelling abroad, you should check government advice on:

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

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

If you have coronavirus symptoms

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

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

Published 3 July 2020

Last updated 26 September 2020 + show all updates

1. 26 September 2020

Curaçao, Denmark, Iceland and Slovakia removed from the travel corridors list at 4am, Saturday 26 September 2020.

2. 24 September 2020

Curaçao, Denmark, Iceland and Slovakia will be removed from the England travel corridors list at 4am, Saturday 26 September 2020.

3. 19 September 2020

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

4. 17 September 2020

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

5. 12 September 2020

French Polynesia, Hungary, Portugal and Réunion removed from the travel corridors list at 4am Saturday 12 September 2020. Sweden added to the list at 4am Saturday 12 September.

6. 10 September 2020

French Polynesia, Hungary, Portugal and Réunion to be removed from the travel corridors list at 4am Saturday 12 September 2020. Sweden to be added to the list at 4am Saturday 12 September.

7. 9 September 2020

Crete, Lesvos, Mykonos, Santorini, Serifos, Tinos and Zakynthos removed from the travel corridor list at 4am Wednesday 9 September 2020.

8. 7 September 2020

Crète, Lesvos, Mykonos, Santorini, Serifos, Tinos and Zakynthos to be removed from the travel corridor list at 4am Wednesday 9 September 2020.

9. 29 August 2020
Czech Republic, Jamaica and Switzerland removed from the travel corridor list at 4am Saturday 29 August 2020. Cuba added to the list at 4am Saturday 29 August.
10. 27 August 2020
Czech Republic, Jamaica and Switzerland to be removed from the exempt list for arrivals from 4am, Saturday, 29 August 2020.
11. 22 August 2020
Austria, Croatia and Trinidad and Tobago removed from the travel corridor list at 4am Saturday 22 August. Portugal added to the list at 4am Saturday 22 August.
12. 20 August 2020
Austria, Croatia and Trinidad and Tobago to be removed from the travel corridor list at 4am Saturday 22 August. Portugal to be added to the list at 4am Saturday 22 August.
13. 15 August 2020
France, the Netherlands, Monaco, Malta, Turks and Caicos Islands and Aruba removed from the exempt list.
14. 13 August 2020
France, the Netherlands, Monaco, Malta, Turks and Caicos Islands and Aruba to be removed from the exempt list for arrivals from 4am Saturday 15 August 2020.
15. 11 August 2020
Brunei and Malaysia added to list.
16. 7 August 2020
Andorra, The Bahamas and Belgium will be removed from the exempt list for arrivals at 4am, 8 August 2020.
17. 30 July 2020
Luxembourg removed from the exempt list for arrivals from 31 July 2020.
18. 28 July 2020
Estonia, Latvia, Slovakia, Slovenia and St Vincent and the Grenadines added to the exempt list.
19. 25 July 2020
Spain removed from the exempt list for arrivals from 26 July 2020.
20. 10 July 2020
Arrivals from Serbia to England removed from the exempt list.
21. 8 July 2020
More information on transit stops, passengers arriving in England before 10 July 2020 and British overseas territories.
22. 3 July 2020
First published.

Related content

- Provide your journey and contact details before you travel to the UK (<https://www.gov.uk/provide-journey-contact-details-before-travel-uk>)
- Coronavirus (COVID-19): countries and territories exempt from advice against 'all but essential' international travel (<https://www.gov.uk/guidance/coronavirus-covid-19-countries-and-territories-exempt-from-advice-against-all-but-essential-international-travel>)
- Travel advice: coronavirus (COVID-19) (<https://www.gov.uk/guidance/travel-advice-novel-coronavirus>)

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

Detailed guidance

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

Collection

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

Explore the topic

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

Chew, Benjamin G.

From: Edward White <ewhite@ewccpas.com>
Sent: Wednesday, August 19, 2020 5:32 PM
To: Chew, Benjamin G.
Cc: Vasquez, Camille M.; Larry Leavitt
Subject: Fantastic Beasts 3 / Johnny Depp
Attachments: E.White.8.19.20.ltr.pdf

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

Dear Ben,

Please review the following e-mail letter I received from Warner Bros. and the related attachment. In response to your inquiry, today is the first day that Warner Bros. informed me of Mr. Depp's requirements and the commencement date for his services.

Best regards,

Ed

Edward White
Edward White & Co., LLP
Certified Public Accountants

Warner Center Towers
21700 Oxnard Street, Suite 400
Woodland Hills, California 91367
Telephone: 818-716-1120
Facsimile: 818-716-2670

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From: Eckerle, Glenn <Glenn.Eckerle@warnerbros.com>
Sent: Wednesday, August 19, 2020 2:24 PM
To: Edward White <ewhite@ewccpas.com>; Larry Leavitt <lleavitt@ewccpas.com>
Cc: Levinson, Jodi <Jodi.Levinson@warnerbros.com>; Bryan Lourd <blourd@caa.com>; Sheldon Sroloff, Esq.

?
(SSroloff@caa.com) <SSroloff@caa.com>; McCorry, Nigel <Nigel.McCorry@warnerbros.com>; Breard, Margaret
<Margaret.Breard@warnerbros.com>
Subject: Fantastic Beasts 3 / Johnny Depp

Hi,

Per your request, please see the attached letter regarding Mr. Depp's schedule on Fantastic Beasts 3.

Please also note that an estimated 750 individuals will be working on the Picture.

Best,

Glenn

Glenn A. Eckerle
Senior Vice President, Legal Affairs
Warner Bros. Pictures
4000 Warner Boulevard | Bldg 3, Room 144 | Burbank, California 91522
Phone: (818) 954-4911 | Fax: (818) 954-3490
glenn.eckerle@warnerbros.com

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WARNER BROS.
PICTURES

Glenn A. Eckerle
Senior Vice President, Legal Affairs

August 19, 2020

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

BY EMAIL

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

Dear Edward:

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

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

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

Very truly yours,


Glenn A. Eckerle

cc: Lawrence Leavitt (all by email)
Bryan Lourd
Sheldon Sroloff
Jodi Levinson
Nigel McCorry

A Division of WB Studio Enterprises Inc.
A Warner Bros. Entertainment Company

4000 Warner Boulevard, Burbank, California 91522
(818) 954-1911 • Fax: (818) 954-3490 • glenn.eckerle@warnerbros.com

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DEPP00018407

Chew, Benjamin G.

From: Chew, Benjamin G.
Sent: Friday, September 04, 2020 2:11 PM
To: 'Smith, Wayne'
Subject: RE: Quick Follow Up Question

Wayne, many thanks, much appreciated! Hope you enjoy the long weekend. Warm regards, Ben

brownrudnick

Benjamin G. Chew
Partner

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



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of Trial Lawyers

----- Forwarded message -----

From: Smith, Wayne [<mailto:Wayne.Smith@warnerbros.com>]
Sent: Friday, September 04, 2020 1:50 PM
To: Chew, Benjamin G.
Subject: RE: Quick Follow Up Question

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

We generally need the star available well in advance of production start and also there is a potential quarantine issue, so I am advised that 5/31 is presently the latest date that we can confirm that we don't need her to be available.

-W

From: Chew, Benjamin G. <BCheW@brownrudnick.com>
Sent: Wednesday, September 2, 2020 9:39 AM
To: Smith, Wayne <Wayne.Smith@warnerbros.com>
Subject: Quick Follow Up Question

[CAUTION]

This email originated outside Warner Bros.

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DEPP00018408

Good morning, Wayne,

I understand what you said re the other film not commencing prior to May 31, 2021.

Is it also true that it will not commence any time prior to June 30, 2021, or is that a theoretical possibility?

Warm regards,

Ben

brownrudnick

Benjamin G. Chew
Partner

Brown Rudnick LLP
601 Thirteenth Street NW Suite 600
Washington, DC 20005
T: 202-536-1785
F: 617-269-0717
bchew@brownrudnick.com
www.brownrudnick.com



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.....

Chew, Benjamin G.

From: Chew, Benjamin G.
Sent: Friday, September 04, 2020 3:21 PM
To: wayne.smith@warnerbros.com
Subject: Fwd: Depp v. Heard : Civil Action No.: CL-2019-0002911 - Ms. Heard's Opposition to Mr. Depp's Motion for Continuance
Attachments: Opp to Mot for Continuance.pdf; ATT00001.htm; Opp to Mot for Continuance Attachments COMBINED.pdf; ATT00002.htm; Praeipce - Opp to Mot for Continuance.pdf; ATT00003.htm

Wayne,

Please see attached.

A short letter confirming that Aquaman 2 will not commence prior to May 31, 2021 would be most appreciated as Ms. Heard's counsel didn't not accurately set that forth in the attached opposition.

Warm regards,

Ben

Sent from my iPhone

Begin forwarded message:

From: "Rottenborn, Ben" <brottenborn@woodsrogers.com>
Date: September 4, 2020 at 2:49:57 PM EDT
To: "Elizabeth.Davis@fairfaxcounty.gov" <Elizabeth.Davis@fairfaxcounty.gov>
Cc: Elaine Bredehoft <ebredehoft@charlsonbredehoft.com>, "Treece, Joshua" <jtreece@woodsrogers.com>, Adam Nadelhaft <anadelhaft@cbcblaw.com>, David Murphy <DMurphy@cbcblaw.com>, Michelle Bredehoft <mbredehoft@charlsonbredehoft.com>, Leslie Hoff <lhoff@charlsonbredehoft.com>, "Vasquez, Camille M." <CVasquez@brownrudnick.com>, "Crawford, Andrew C." <ACrawford@brownrudnick.com>, "Chew, Benjamin G." <BCheW@brownrudnick.com>, "awaldman@theendeavorgroup.com" <awaldman@theendeavorgroup.com>
Subject: Depp v. Heard : Civil Action No.: CL-2019-0002911 - Ms. Heard's Opposition to Mr. Depp's Motion for Continuance

Chew, Benjamin G.

From: Chew, Benjamin G.
Sent: Tuesday, September 08, 2020 11:37 AM
To: 'Smith, Wayne'
Subject: Follow Up

Good morning, Wayne,

Hope you enjoyed the weekend.

Following up on my message to you of Friday afternoon, you saw that Ms. Heard's counsel represented in her brief at page 2 that "Warner Bros counsel said they do not know when Aquaman II will begin filming, but it will be sometime in Spring of 2021, which is also a basis for denying the continuance-...."

As you know, that representation by Ms. Heard's counsel is inaccurate. You told Ms. Bredehoft and me in separate conversations that "Aquaman II" would not begin shooting, and you would not need Ms. Heard to be available, prior to May 31, 2021.

Without asking you to take sides in any dispute between Mr. Depp and Ms. Heard, I would greatly appreciate your please kindly considering sending a short letter to that effect. (I do have your confirming email message of September 4, 1:50 p.m., which is helpful, but something on letterhead would be preferred if possible.) As to timing, we would greatly appreciate it today or tomorrow at the latest.

Warm regards,

Ben

brownrudnick

Benjamin G. Chew
Partner

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

Please do not disseminate this information outside of the intended recipients.

Chew, Benjamin G.

From: Chew, Benjamin G.
Sent: Tuesday, September 08, 2020 3:25 PM
To: Smith, Wayne
Subject: Re: Follow Up

Certainly!

Sent from my iPhone

On Sep 8, 2020, at 2:23 PM, Smith, Wayne <Wayne.Smith@warnerbros.com> wrote:

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

In 7 minutes I go dark for an hour.

From: Smith, Wayne
Sent: Tuesday, September 8, 2020 11:15 AM
To: Chew, Benjamin G. <BChew@brownrudnick.com>
Subject: RE: Follow Up

Available now.

From: Smith, Wayne
Sent: Tuesday, September 8, 2020 10:57 AM
To: Chew, Benjamin G. <BChew@brownrudnick.com>
Subject: RE: Follow Up

Can we roll back to 210pm EDT?

From: Chew, Benjamin G. <BChew@brownrudnick.com>
Sent: Tuesday, September 8, 2020 8:53 AM
To: Smith, Wayne <Wayne.Smith@warnerbros.com>
Subject: RE: Follow Up

Great, Wayne, will call then, many thanks! Warm regards, Ben

<image001.jpg>

Benjamin G. Chew
Partner

Brown Rudnick LLP
601 Thirteenth Street NW Suite 600
Washington, DC 20005
T: 202-536-1785
F: 617-289-0717

bchew@brownrudnick.com
www.brownrudnick.com
<Image002.jpg>

Please do not click on any links or attachments before you have received this message.

From: Smith, Wayne [<mailto:Wayne.Smith@warnerbros.com>]
Sent: Tuesday, September 08, 2020 11:52 AM
To: Chew, Benjamin G.
Subject: RE: Follow Up

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

I am available at 2pm your time if you want to talk for a couple of minutes. Number is below.

Wayne M. Smith | SVP, Corporate Legal | Warner Bros. Entertainment Inc.
Bldg. 156, Room 5120 | 4000 Warner Blvd. | Burbank, California 91522
☎ 818-424-1658 | ✉ wayne.smith@warnerbros.com

From: Chew, Benjamin G. <BCheW@brownrudnick.com>
Sent: Tuesday, September 8, 2020 8:37 AM
To: Smith, Wayne <Wayne.Smith@warnerbros.com>
Subject: Follow Up

[CAUTION]
This email originated outside Warner Bros.

Good morning, Wayne,

Hope you enjoyed the weekend.

Following up on my message to you of Friday afternoon, you saw that Ms. Heard's counsel represented in her brief at page 2 that "Warner Bros counsel said they do not know when Aquaman II will begin filming, but it will be sometime in Spring of 2021, which is also a basis for denying the continuance-...."

As you know, that representation by Ms. Heard's counsel is inaccurate. You told Ms. Bredehoft and me in separate conversations that "Aquaman II" would not begin shooting, and you would not need Ms. Heard to be available, prior to May 31, 2021.

Without asking you to take sides in any dispute between Mr. Depp and Ms. Heard, I would greatly appreciate your please kindly considering sending a short letter to that effect. (I do have your confirming email message of September 4, 1:50 p.m., which is helpful, but something on letterhead would be preferred if possible.) As to timing, we would greatly appreciate it today or tomorrow at the latest.

Warm regards,

Ben

<image001.jpg>

Benjamin G. Chew
Partner

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

Please consider the environment before reading this e-mail

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.....

.....

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

.....

Chew, Benjamin G.

From: Smith, Wayne <Wayne.Smith@warnerbros.com>
Sent: Tuesday, September 08, 2020 5:29 PM
To: Elaine Bredehoff; Chew, Benjamin G.
Cc: Eckerle, Glenn
Subject: Depp v. Heard
Attachments: Depp v Heard Counsel Ltr 090820.pdf

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

Dear Counsel:

Please see the attached correspondence regarding the referenced matter.

Regards,

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



WARNER BROS.
ENTERTAINMENT INC.

Wayne M. Smith
Senior Vice President
Corporate Legal

September 8, 2020

VIA EMAIL

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

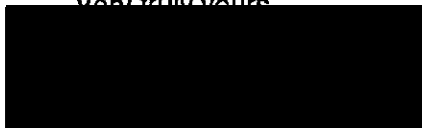
Benjamin G. Chew
Brown Rudnick LLP
601 Thirteenth Street NW Suite 600
Washington, DC 20005

Re: *Depp v. Heard*

Dear Ms. Bredehoft and Mr. Chew:

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

Very truly yours,



Wayne M. Smith

WMS:wb

A Time Warner Company

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

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DEPP00018416

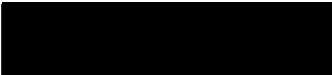
CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this 2nd day of October, 2020, I caused true and correct copies of the foregoing Opposition to be served via email (per written agreement between the Parties) on the following:

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

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

Counsel for Defendant Amber Laura Heard


Benjamin G. Chew