TO the person authorized to serve this process: Upon execution, the return of this process shall be made to the Clerk of Court.
NAME: Debbie Lloyd
ADDRESS: 71 Tempe Trail
Palm Desert, California 92211
[ ] PERSONAL SERVICE Tel. No.
Being unable to make personal service, a copy was delivered in the following manner:
[ ] Delivered to family member (not temporary sojourner or guest) age 16 or older at usual place of abode of party named above after giving information of its purport. List name, age of recipient, and relation of recipient to party named above:
Posted on front door or such other door as appears to be the main entrance of usual place of abode, address
listed above. (Other authorized recipient not found.)
[ ] not found , Sheriff
by, Deputy Sheriff

[ ] This Subpoena/Subpoena Duces Tecum to Person Under Foreign Subpoena is being served by a private

process server who must provide proof of service in accordance with Va. Code § 8.01-325.

JOHN T. FREY, CLERK FAIRFAX COUNTY CIRCUIT COURT 4110 CHAIN BRIDGE ROAD FAIRFAX, VIRGINIA 22030

SUBPOENA/SUBPOENA DUCES TECUM		CL2019-0002911 File No		
TO PERSON UNDE	R FOREIGN SUBPOENA ia VA CODE §§ 8.01-412.8—8.01-412.15			
	······		Circuit Cour	
•	d, Fairfax, Virginia 22030		701	
!==q=====;	ADDRESS O			
John C. Depp, II	v/In i	e: Amber Laura Heard	20年 18	
to the levoon at	THORIVED BY LAW TO SEKA	E THIS PROCESS:	301	
You are commanded to	summon		グラコー電	
	Debbie Llo	oyd	* See = = = = = = = = = = = = = = = = = =	
***************************************	NAM	E	5 5	
<del>doctorias Bib</del> os (danocecenterops) (r 1800aa - Montoniaganya 1865-1865)	71 Tempe		9 O	
Dalas Dagast	STREET AI	DDRESS	<del>ermi/14-ct () maide</del> r, fi compagnity physiological <del>construction (natural construction ad</del> construction and	
Palm Desert	California	-	92211	
СПҮ	STATE		ZIP	
described below	·			
1900 Avenue of th	e Stars, Ste. 400, 00067 LOCATION	at December	17, 2019 at 9:00 a.m.	
and to permit inspec designated items in	etion and copying by the requesting your possession, custody or control	party or someone acting in		
permit inspection of	the premises			
at the following location	1			
***************************************	LOCAT	ION		
DATE A	ND TIME			
his subpoena is issued	upon the request of the party named Amber Laura	a Heard		
c/o Ben Rotten	NAME OF REQUE born, Esq., Woods Rogers, PLC, 10 S	stingparty . Jefferson Street, Ste. 1400		
_	STREET AL	DDRESS	F644495);;de444444(14;f494444444444444444444444444444444444	
Roanoke	Virginia	24011	(540) 983-7540	
CITY	STATE	ZIP	TELEPHONE NUMBER	

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

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

December 4,2019	_JOHN T_	FREY CLERK	
DATE ISSUED			
	by		
J. Benjamin Rottenborn	84796	Virginia	
NAME OF ATTORNEY FOR REQUESTING PARTY	BAR NUMBER	LICENSING STATE	
Woods Rogers PLC, 10 S. Jefferson St.	(540) 983-7540		
OFFICE ADDRESS	***************************************	MBER OF ATTORNEY	
Suite 1400, Roanoke, Virginia 24011	(540) 983-7711		
OFFICE ADDRESS	FACSIMILE NUMBER OF ATTORNEY		
NAME	BAR NUMBER	LICENSING STATE	
STREET ADDRESS	TELEPH	ONE NUMBER	
STREET ADDRESS		MILE NUMBE	
	•		
NAME	BAR NUMBER	LICENSING STATE	
STREET ADDRESS		ONE NUMBER	
STREET ADDRESS		IILE NUMBER	
	<del>.</del>		
NAME	BAR NUMBER	LICENSING STATE	
STREET ADDRESS	TELEPH	ONE NUMBER	
STREET ADDRESS		IILE NUMBER	

RETURN OF SERVICE (see page three of this form)

# John C. Depp, II v. Amber Laura Heard Fairfax County Case No. CL-2019-0002911

#### All Counsel of Record

Benjamin G. Chew, Esq. (VSB 29113) Elliot J. Weingarten Andrew C. Crawford (VSB No. 89093) BROWN RUDNICK LLP 601 Thirteenth Street, NW Washington, DC 20005 (202) 536-1700 (202) 536-1701 — FAX bchew@brownrudnick.com Counsel for John C. Depp, II

Camille M. Vasquez
BROWN RUDNICK LLP
2211 Michelson Drive
Irvine, CA 92612
Tel. (949) 752-7100
Fax (949) 252-1514
evasquez@brownrudnick.com

Counsel for John C. Depp, II

Adam R. Waldman, Esq. THE ENDEAVOR LAW FIRM, P.C. 1775 Pennsylvania Avenue, NW, Suite 350 Washington, DC 20006 Counsel for John C. Depp, II

Robert Gilmore, Esq.
Kevin L. Attridge, Esq.
STEIN MITCHELL BEATO & MISSNER LLP
901 Fifteenth Street, NW, Suite 700
Washington, DC 20005
Tel. (202) 601-1602, or 1589
Fax (202) 296-8312
rgilmore@steinmitchell.com

Counsel for John C. Depp, II

Joshua R. Treece, Esq.
J. Benjamin Rottenborn, Esq.
WOODS ROGERS PLC
10 S. Jefferson Street, Suite 1400
Roanoke, VA 24011
T: 540.983.7730
F: 540.322.3885
jtreece@woodsrogers.com
brottenbom@woodsrogers.com

Counsel for Amber Laura Heard

Timothy J. McEvoy, Esq. (VSB No. 33277)
Sean Patrick Roche, Esq. (VSB No. 71412)
CAMERON/McEVOY, PLLC
4100 Monument Corner Drive,
Suite 420 Fairfax, Virginia 22030
703.460.9343 (Direct)
703.273.8898 (Office)
703.273.8897 (Fax)
tmcevoy@cameronmcevoy.com
sroche@cameronmcevoy.com

Davida Brook, Esq. (SBN 275370) SUSMAN GODFREY L.L.P. 1900 Avenue of the Stars, Suite 1400 Los Angeles, CA 90067 Tel. (310) 789-3105 dbrook@susmangodfrey.com

Roberta A. Kaplan, Esq.
John C. Quinn, Esq.
Julie E. Fink, Esq.
KAPLAN HECKER & FINK LLP
350 Fifth Avenue, Suite 7110 New
York, New York 10118 T:
212.763.0883
rkaplan@kaplanhecker.com
jfink@kaplanhecker.com
jquinn@kaplanhecker.com

Counsel for Amber Laura Heard

Counsel for Amber Laura Heard

Counsel for Amber Laura Heard

	ı	SUBP-040
ATTORNEY OR PARTY WITHOUT ATTORNEY (Name, State Ber number, and address):  Davida Brook (SBN 275370)  Susman Godfrey L.L.P.  1900 Avenue of the Stars, Suite 1400, Los Angeles, TELEPHONE NO.: 310-789-3100  E-MAIL ADDRESS (Optional): dbrook@susmangodfrev.com ATTORNEY FOR (Name): Defendant Amber Laura Heard  Court for county in which discovery is to be conducted: SUPERIOR COURT OF CALIFORNIA, COUNTY OF LOS Ange STREET ADDRESS: 111 N. Hill Street MAILING ADDRESS: 111 N. Hill Street CITY AND ZIP CODE: Los Angeles, CA 90012 BRANCH NAME: Central District  Court in which action is pending: Name of Court: In the Circuit Court of Fairfax, Virging STREET ADDRESS: 4110 Chain Bridge Road MAILING ADDRESS: CITY, STATE, AND ZIP CODE: Fairfax, VA 22030-4009	les	FOR COURT USE ONLY
COUNTRY: United States		
PLAINTIFF/PETITIONER: JOHN C. DEPP, II DEFENDANT/RESPONDENT: AMBER LAURA HEARD		CALIFORNIA CASE NUMBER (if any assigned by court):
DEPOSITION SUBPOENA FOR PERSONAL A IN ACTION PENDING OUTSIDE CALIF		CASE NUMBER (of action pending outside California):  CL-2019-0002911
THE PEOPLE OF THE STATE OF CALIFORNIA, TO (name, ac Debbie Lloyd, 71 Tempe Trail, Palm Desert, CA 92211  1. YOU ARE ORDERED TO APPEAR IN PERSON TO TESTIF date, time, and place:	•	
Date: Time:	Address:	
December 17, 2019 9:00 AM	1900 Avenue of the S	Stars, Ste 1400, LA, CA 90067
a. As a deponent who is not a natural person, you are or to the matters described in item 2. (Code Civ. Proc., §	<del>-</del>	more persons to testify on your behalf as
<ul> <li>b. This deposition will be recorded stenographically  the and by  audiotape  videotape.</li> </ul>	rough the instant visual dis	play of testimony
If the witness is a representative of a business or other of follows:	entity, the matters upon wh	ich the witness is to be examined are as
Continued on Attachment 2 (use form MC-025).  3. Attorneys of record in this action or parties without attorneys a represented):  See Attachment 3	are (name, address, telepho	one number, and name of party

Continued on Attachment 3 (use form MC-025).

Page 1 of 2

SUBP-040 CASE NUMBER (of action pending outside California): PLAINTIFF/PETITIONER: JOHN C. DEPP, II CL-2019-0002911 DEFENDANT/RESPONDENT: AMBER LAURA HEARD Other terms or provisions from out-of-state subpoena, if any (specify): See Attachment 4 ✓ Continued on Attachment 4 (use form MC-025). 5. At the deposition, you will be asked questions under oath. Questions and answers are recorded stenographically at the deposition; later they are transcribed for possible use at trial. You may read the written record and change any incorrect answers before you sign the deposition. You are entitled to receive witness fees and mileage actually traveled both ways. The money must be paid, at the option of the party giving notice of the deposition, either with service of this subpoena or at the time of the deposition. Unless the court orders or you agree otherwise, if you are being deposed as an individual, the deposition must take place within 75 miles of your residence. The location of the deposition for all deponents is governed by Code of Civil Procedure section 2025.250. DISOBEDIENCE OF THIS SUBPOENA MAY BE PUNISHED AS CONTEMPT BY THIS COURT. YOU WILL ALSO BE LIABLE FOR THE SUM OF \$500 AND ALL DAMAGES RESULTING FROM YOUR FAILURE TO OBEY. Date issued: 11/26/2019 Davida Brook (TYPE OR PRINT NAME) (SIGNATURE OF PERSON ISSUING SUBPOENA) Attorney for Defendant Amber Laura Heard PROOF OF SERVICE OF DEPOSITION SUBPOENA FOR PERSONAL APPEARANCE 1. I served this Deposition Subpoena for Personal Appearance in Action Pending Outside California by personally delivering a copy to the person served as follows: a. Person served b. Address where served: c. Date of delivery: d. Time of delivery: e. Witness fees and mileage both ways (check one): were not paid. were tendered to the witness's public entity employer as required by Government Code section 68097.2. The amount tendered was (specify): 2. I received this subpoena for service on (date): 3. Person serving: a. Not a registered California process server b. California sheriff or marshal C. Registered California process server d. Employee or independent contractor of a registered California process server Exempt from registration under Business and Professions Code section 22350(b) f. Name, address, telephone number, and, if applicable, county of registration and number:

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

(SIGNATURE)

(For California sheriff or marshal use only) I certify that the foregoing is true and correct.

Date:

	(SIGNATURE)

Date:

SHORT TITLE:	1	CASE NUMBER:
Depp v. Heard	, ,	CL-2019-0002911

ATTACHMENT (Number): 3

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

Benjamin G. Chew, Esq. (VSB 29113) Elliot J. Weingarten Andrew C. Crawford (VSB No. 89093) **BROWN RUDNICK LLP** 601 Thirteenth Street, NW Washington, DC 20005 (202) 536-1700 (202) 536-1701 - FAX bchew@brownrudnick.com

Counsel for John C. Depp, II

Camille M. Vasquez **BROWN RUDNICK LLP** 2211 Michelson Drive Irvine, CA 92612 Tel. (949) 752-7100 Fax (949) 252-1514 cvasquez@brownrudnick.com

Counsel for John C. Depp, II

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

Counsel for John C. Depp, II

Robert Gilmore, Esq. Kevin L. Attridge, Esq. STEIN MITCHELL BEATO & MISSNER LLP 901 Fifteenth Street, NW, Suite 700 Washington, DC 20005 Tel. (202) 601-1602, or 1589 Fax (202) 296-8312 rgilmore@steinmitchell.com

Counsel for John C. Depp, II

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

Page 1 of 2

(Add pages as required)

SHORT TITLE:

Depp v. Heard

CASE NUMBER:

CL-2019-0002911

# ATTACHMENT (Number): 3 Cont.

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

Joshua R. Treece, Esq.
J. Benjamin Rottenborn, Esq.
WOODS ROGERS PLC
10 S. Jefferson Street, Suite 1400
Roanoke, VA 24011
T: 540.983.7730
F: 540.322.3885
jtreece@woodsrogers.com
brottenborn@woodsrogers.com

Counsel for Amber Laura Heard

Timothy J. McEvoy, Esq. (VSB No. 33277)
Sean Patrick Roche, Esq. (VSB No. 71412)
CAMERON/McEVOY, PLLC
4100 Monument Corner Drive, Suite 420
Fairfax, Virginia 22030
703.460.9343 (Direct)
703.273.8898 (Office)
703.273.8897 (Fax)
tmcevoy@cameronmcevoy.com
sroche@cameronmcevoy.com

Counsel for Amber Laura Heard

Davida Brook, Esq. (SBN 275370) SUSMAN GODFREY L.L.P. 1900 Avenue of the Stars, Suite 1400 Los Angeles, CA 90067 Tel. (310) 789-3105 dbrook@susmangodfrey.com

Counsel for Amber Laura Heard

Roberta A. Kaplan, Esq.
John C. Quinn, Esq.
Julie E. Fink, Esq.
KAPLAN HECKER & FINK LLP
350 Fifth Avenue, Suite 7110
New York, New York 10118
T: 212.763.0883
rkaplan@kaplanhecker.com
jfink@kaplanhecker.com

Counsel for Amber Laura Heard

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

Page 2 of 2

(Add pages as required)

		;		MC-025
SHORT TITLE:	-	1	CASE NUMBER:	
Depp v. Heard			CL-2019-0002911	
ATTACHMENT (Number): 4				
(This Attachment may be used with any Judicial Council form.)				
See Attached.				

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

Page 1 of \_\_\_\_\_(Add pages as required)

CIVIL INTAKE

VIRGINIA:

2019 NOY 27 AM 11:50

JOHIN T. FREY TURK-CIRCUIT COUNT

CAIREAY, VA.

### IN THE CIRCUIT COURT OF FAIRFAX COUNTY

JOHN C. DEPP, II

Plaintiff,

٧.

Civil Action No.: CL-2019-0002911

AMBER LAURA HEARD

Defendant.

### **CERTIFICATE OF COUNSEL**

This is to certify that I caused a true and accurate copy of the enclosed Deposition

Subpoena for Personal Appearance in Action Pending Outside California and Virginia Subpoena

To Person Under Foreign Subpoena to be sent via United States Mail on the 26<sup>th</sup> day of

November, 2019, to counsel of record

VSB 7960C

J. Benjamin Rottenborn

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

Attorneys for Defendant Amber Laura Heard

I certify that on this 26th day of November 2019, a copy of the foregoing shall be served by first class mail, postage prepaid, and by email, upon:

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

Camille M. Vasquez, Esq. BROWN RUDNICK LLP 2211 Michelson Drive Irvine, CA 92612

Telephone: (949) 752-7100 Facsimile: (949) 252-1514 cvasquez@brownrudnick.com Adam R. Waldman, Esq.
THE ENDEAVOR LAW FIRM, P.C.
1775 Pennsylvania Avenue, N.W., Suite 350
Washington, DC 20006
awaldman@theendeavorgroup.com

Robert Gilmore, Esq.
Kevin Attridge, Esq.
STEIN MITCHELL BEATO & MISSNER LLP
901 Fifteenth Street, N.W.
Suite 700
Washington, D.C. 20005
Telephone: (202) 601-1589
Facsimile: (202) 296-8312
rgilmore@steinmitchell.com
kattridge@steinmitchell.com

Counsel for Plaintiff John C. Depp, II

USB 89602 Uper mission

J. Benjamin Rottenborn Joshua Treece WOODS ROGERS PLC 10 S. Jefferson Street

**Suite 1400** 

Roanoke, VA 24011

Telephone: (540) 983-7540 Facsimile: (540) 983-7711 <u>brottenborn@woodsrogers.com</u> itreece@woodsrogers.com



BEN ROTTENBORN (540) 983-7540 brottenborn@woodsrogers.com

November 26, 2019

### VIA OVERNIGHT UPS DELIVERY

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

> Re: John C. Depp, II v. Amber Laura Heard;

Fairfax County Circuit Court Case No. CL2019-0002911

Dear Mr. Frey,

In the above-referenced matter, enclosed for filing please find two copies of Defendant's Certificate of Counsel and corresponding subpoenas issued pursuant to Virginia Code Section 8.01-412.10 and California Civil Procedure Code Section 2029.100 (collectively, "Acts"). The enclosed Deposition Subpoena for Personal Appearance in Action Pending Outside California and Virginia Subpoena To Person Under Foreign Subpoena have been issued in accordance with both Acts and the reciprocal privileges included therein.

The enclosed documents will be served by private process server and affidavits of service will be filed as necessary. Please file these documents with the Court's papers in this case and return a file-stamped copy of the same in the enclosed, self-addressed envelope.

Thank you for your assistance and please do not hesitate to call with any questions or concerns.

Very truly yours,

WOODS ROGERS PLC

5B 896 02 Upenission

Ben Rottenborn

JBR:jt **Enclosures** 

{2655556-1, 121024-00001-01}

P.O. Box 14125, Roanoke, Virginia 24038-4125 10 S. Jefferson Street, Suite 1400, Roanoke VA 24011 P (540) 983-7600 • F (540) 983-7711