

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

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

NAME: Erin Boerum	
ADDRESS: 585 1/2 Washington Blvd.	
Marina Del Ray, CA 90292	
<input type="checkbox"/> PERSONAL SERVICE	Tel. No. _____
Being unable to make personal service, a copy was delivered in the following manner:	
<input type="checkbox"/> Delivered to family member (not temporary sojourner or guest) age 16 or older at usual place of abode of party named above after giving information of its purport. List name, age of recipient, and relation of recipient to party named above:	

<input type="checkbox"/> Posted on front door or such other door as appears to be the main entrance of usual place of abode, address listed above. (Other authorized recipient not found.)	
<input type="checkbox"/> not found	_____, Sheriff
DATE _____	by _____, Deputy Sheriff

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

brownrudnick

BENJAMIN G. CHEW
direct dial: 202.536.1785
bchew@brownrudnick.com

January 12, 2021

FILED
CIVIL INTAKE

2021 JAN 12 PM 1:16

JOHN T. FREY
CLERK, CIRCUIT COURT
FAIRFAX, VA

VIA HAND DELIVERY

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

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

Dear Mr. Frey,

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

The enclosed documents will be served by private process server. Please file one copy with the Court's papers in this case and issue one copy in accordance with the Uniform Interstate Deposition and Discovery Act. We enclose a self-addressed, stamped envelope for the return copy. Thank you for your assistance.

Regards,

BROWN RUDNICK LLP

Benjamin G. Chew

Enclosures

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

File No. CL-2019-0002911

Commonwealth of Virginia VA CODE §§ 8.01-412.8—8.01-412.15; Rule 4:9

FAIRFAX COUNTY

Circuit Court

4110 CHAIN BRIDGE ROAD, FAIRFAX, VIRGINIA 22030

ADDRESS OF COURT

JOHN C. DEPP, II

v./In re:

AMBER LAURA HARRIS

TO THE PERSON AUTHORIZED BY LAW TO SERVE THIS PROCESS:

You are commanded to summon

Erin Boerum

NAME

585 1/2 Washington Blvd

STREET ADDRESS

Marina Del Rey

CA

90292

CITY

STATE

ZIP

FILED
CIVIL INTAKE
2021 JAN 12 PM 1:16
JOHN T. FREY
CLERK
FAIRFAX, VA
CIRCUIT COURT

TO THE PERSON SUMMONED: You are commanded to

attend and give testimony at a deposition

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

.....
.....
.....
.....

at Remote via video-conference at February 23, 2021 at 10:00 a.m.

LOCATION

DATE AND TIME

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

permit inspection of the premises

at the following location

.....
LOCATION

on
DATE AND TIME

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

John C. Depp, II

NAME OF REQUESTING PARTY

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

STREET ADDRESS

Washington

DC

20005

(202) 536-1700

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 on attached list.

January 12, 2021
DATE ISSUED

JOHN T. FREY, CLERK

by 
DEPUTY CLERK

Benjamin G. Chew
NAME OF ATTORNEY FOR REQUESTING PARTY

29113
BAR NUMBER

VA
LICENSING STATE

601 Thirteenth Street, N.W., Suite 600
OFFICE ADDRESS

(202) 536-1700
TELEPHONE NUMBER OF ATTORNEY

Washington, DC 20005
OFFICE ADDRESS

(202) 536-1701
FACSIMILE NUMBER OF ATTORNEY

NAME

BAR NUMBER

LICENSING STATE

STREET ADDRESS

TELEPHONE NUMBER

STREET ADDRESS

FACSIMILE NUMBER

NAME

BAR NUMBER

LICENSING STATE

STREET ADDRESS

TELEPHONE NUMBER

STREET ADDRESS

FACSIMILE NUMBER

NAME

BAR NUMBER

LICENSING STATE

STREET ADDRESS

TELEPHONE NUMBER

STREET ADDRESS

FACSIMILE NUMBER

RETURN OF SERVICE (see page three of this form)

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

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

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

Counsel for Plaintiff John C. Depp, II

SERVICE LIST

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

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

Counsel for Defendant Amber Laura Heard

ATTORNEY OR PARTY WITHOUT ATTORNEY (Name, State Bar number, and address): BROWN RUDNICK LLP LEO J. PRESIADO, #166721 / CAMILLE M. VASQUEZ, #273377 SAMUEL A. MONIZ, #313274 2211 Michelson Drive, Seventh Floor, Irvine, CA 92612 TELEPHONE NO.: (949) 752-7100 FAX NO. (Optional): (949) 252-1514 E-MAIL ADDRESS (Optional): lpresiado@brownrudnick.com/cvasquez@brownrudnick.com ATTORNEY FOR (Name): John C. Depp, II	FOR COURT USE ONLY
Court for county in which discovery is to be conducted: SUPERIOR COURT OF CALIFORNIA, COUNTY OF LOS ANGELES STREET ADDRESS: 111 N. Hill Street MAILING ADDRESS: 111 N. Hill Street CITY AND ZIP CODE: Los Angeles 90012 BRANCH NAME: Stanley Mosk	
Court in which action is pending: Name of Court: Circuit Court of Fairfax County STREET ADDRESS: 4110 Chain Bridge Road MAILING ADDRESS: 4110 Chain Bridge Road, Suite 320 CITY, STATE, AND ZIP CODE: Fairfax, Virginia 22030 COUNTRY: United States	
PLAINTIFF/PETITIONER: John C. Depp, II DEFENDANT/RESPONDENT: Ambér Laura Heard	CALIFORNIA CASE NUMBER (if any assigned by court): 19STCP04763
DEPOSITION SUBPOENA FOR PERSONAL APPEARANCE IN ACTION PENDING OUTSIDE CALIFORNIA	CASE NUMBER (of action pending outside California): CL-2019-0002911

THE PEOPLE OF THE STATE OF CALIFORNIA, TO (name, address, and telephone number of deponent, if known):
 Erin Boerum, 585 ½ Washington Blvd, Marina Del Rey, CA 90292

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

Date: February 23, 2021	Time: 10:00 a.m.	Address: Remote via video-conference
----------------------------	---------------------	---

- a. As a deponent who is not a natural person, you are ordered to designate one or more persons to testify on your behalf as to the matters described in item 2. (Code Civ. Proc., § 2025.230.)
- b. This deposition will be recorded stenographically through the instant visual display of testimony and by audiotape videotape.
2. If the witness is a representative of a business or other entity, the matters upon which the witness is to be examined are as follows:

Continued on Attachment 2 (use form MC-025).

3. Attorneys of record in this action or parties without attorneys are (name, address, telephone number, and name of party represented):
 See Attachment 3

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

PLAINTIFF/PETITIONER: John C. Depp, II	CASE NUMBER (of action pending outside California): CL-2019-0002911
DEFENDANT/RESPONDENT: Amber Laura Heard	

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

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: January 12, 2021

CAMILLE M. VASQUEZ
(TYPE OR PRINT NAME)

[Redacted Signature]

(SIGNATURE OF PERSON ISSUING SUBPOENA)
Attorney for John C. Depp, II
(TITLE)

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):
 - (1) were paid. Amount: \$ _____
 - (2) were not paid.
 - (3) were tendered to the witness's public entity employer as required by Government Code section 68097.2. The amount tendered was (specify): \$ _____
 - f. Fee for service: \$ _____
2. I received this subpoena for service on (date):
3. Person serving:
 - a. Not a registered California process server
 - b. California sheriff or marshal
 - c. Registered California process server
 - d. Employee or independent contractor of a registered California process server
 - e. Exempt from registration under Business and Professions Code section 22350(b)
 - f. Name, address, telephone number, and, if applicable, county of registration and number:

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

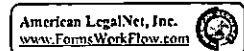
(For California sheriff or marshal use only)
I certify that the foregoing is true and correct.

Date: _____
▶

(SIGNATURE)

Date: _____
▶

(SIGNATURE)



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

ATTACHMENT (Number): 3

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

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

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

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

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

Counsel for Plaintiff John C. Depp, II

Craig J. Mariam
 John P. Cogger
 Kristin Blocher
 Gordon Rees Scully Mansukhani, LLP
 633 West Fifth Street, 52nd floor
 Los Angeles, CA 90071
 Telephone: (213) 576-5000
 Facsimile: (877) 306-0043
 cmariam@grsm.com
 jcogger@grsm.com
 kblocher@grsm.com

Counsel for Defendant Amber Laura Heard

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

Page 1 of 1

(Add pages as required)

CERTIFICATE OF SERVICE


I HEREBY CERTIFY that on this 12th day of January 2021, I caused copies of the foregoing to be served via email (per written agreement between the Parties) on the following:

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

Craig J. Mariam
John P. Cogger
Kristin Blocher
Gordon Rees Scully Mansukhani, LLP
633 West Fifth Street, 52nd floor
Los Angeles, CA 90071
Telephone: (213) 576-5000
Facsimile: (877) 306-0043
cmariam@grsm.com
jcogger@grsm.com
kblocher@grsm.com

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

Counsel for Defendant Amber Laura Heard


Benjamin G. Chew

brownrudnick

BENJAMIN G. CHEW
direct dial: 202.536.1785
bchew@brownrudnick.com

FILED
CIVIL INTAKE

2021 JAN 12 PM 1:17

JOHN T. FREY
CLERK, CIRCUIT COURT
FAIRFAX, VA

January 12, 2021

VIA HAND DELIVERY

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

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

Dear Mr. Frey,

Please find enclosed two copies of an original foreign subpoena duces tecum of third party witness Erin Boerum pursuant to Virginia Code Section 8.01-412.10 and California Civil Procedure Code Section 2029.100 et seq. The enclosed subpoena has been issued in accordance with both Acts and the reciprocal privileges included therein.

The enclosed documents will be served by private process server. Please file one copy with the Court's papers in this case and issue one copy in accordance with the Uniform Interstate Deposition and Discovery Act. We enclose a self-addressed, stamped envelope for the return copy. Thank you for your assistance.

Regards,

BROWN RUDNICK LLP


Benjamin G. Chew

Enclosures

Fairfax Circuit Court
Circuit Court
Receipt No. 920328
Receipt Date: 01/12/2021 03:49 PM

Received of: Benjamin Chew, \$ 11.00

Eleven and 00/100

John C Depp II vs. Amber Laura Heard

Filer(s): Depp, John C II

<u>Case</u>	<u>Amount</u>
CL-2019-0002911	
Copy - Certified	6.00
Subpoena Duces Tecum Clerks Fee	5.00
<hr/>	
Total:	11.00

Balance due court: \$ 0.00
Next fine/fee due date:
Next restitution due date:

Check (Num: 292, Exp: xx/xx)

Amount Tendered: 11.00
Overage: 0.00
Change Due: 0.00

John T. Frey, Clerk of Circuit Court

By: _____

Deputy Clerk
Clerk: JCALLI