# CL 2019 - 2911

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: LAPD Discovery Section, Subpoena Duces Tecum Processing Un ADDRESS: 200 N. Spring St. Ste 1900	ril
LOS Angeles California 90012  [] 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	
DATE	

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

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

CTIDDOENA/CTIDDO	ENA DUCES TECUM		2019-0002911
TO PERSON UNDE	R FOREIGN SUBPOENA  A VA CODE §§ 8.01-412.8—8.01-41	   2.15; Rule 4:9 	
4110 Chain Bridge Road	, Fairfax, Virginia 22030		Circuit Court
		RESS OF COURT	
John C. Depp, II	v.	/In re: Amber Laura Hea	ird 122
TO THE PERSON AU	THURIZED BY LAW TO SE	ERVE THIS PROCESS:	31.77
You are commanded to	summon LAPD	•	表 5 8 9 8 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1
Disc	overy Section, Subpoena Duces	NAME Tecum Processing Unit, 200	
Los Angeles	str Califo	EET ADDRESS	90012
CITY		лиа STATE	ZIP
X   produce the books, of described below   S	ee Exhibit A		
	y Blvd., Los Angeles, CA 90026 LOCATION	at	DATE AND TIME
	tion and copying by the reques your possession, custody or cor		ng in his or her behalf of the
permit inspection of	the premises		
at the following location	ı		
		LOCATION	
on	ND TIME		
This subpoena is issued	upon the request of the party na Amber	amed below Laura Heard	
c/o Ben Rotten	born, Esq., Woods Rogers, PLC,	REQUESTING PARTY  10 S. Jefferson Street, Ste.	1400
Roanoke	sm	REET ADDRESS	(540) 983-7540
CITY	Virginia state	24011 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  $\sqrt{\phantom{a}}$  below  $\sqrt{\phantom{a}}$  on attached list.

December 9,2019	JOHN 1	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		NE NUMBER OF ATTORNEY
Suite 1400, Roanoke, Virginia 24011	(540) 983-7711	
OFFICE ADDRESS		E NUMBER OF ATTORNEY
	-	
NAME	BAR NUMBER	LICENSING STATE
STREET ADDRESS		ELEPHONE NUMBER
STREET ADDRESS		ACSIMILE NUMBE
NAME	BAR NUMBER	LICENSING STATE
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STREET ADDRESS		ACSIMILE NUMBER
		-
NAME	BAR NUMBER	LICENSING STATE
STREET ADDRESS	TF	LEPHONE NUMBER
STREET ADDRESS	F	ACSIMILE NUMBER

**RETURN OF SERVICE** (see page three of this form)

FILED CIVIL INTAKE

VIRGINIA:

2019 NOV 27 AM 11:51

JOHN T. FREY TERK-CIRCUIT COURT

SAIREAX, VA

#### IN THE CIRCUIT COURT OF FAIRFAX COUNTY

JOHN C. DEPP, II

v.

Plaintiff,

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 Subpoena for

Production of Business Records in Action Pending Outside California and Subpoena Duces

Tecum To Person Under Foreign Subpoena to be sent via United States Mail on the 25th day of

November, 2019, to counsel of record.

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 25th 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
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awaldman@theendeavorgroup.com

Robert Gilmore, Esq.
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kattridge@steinmitchell.com

Counsel for Plaintiff John C. Depp, II

V5699602

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> <u>itreece@woodsrogers.com</u>

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

#### All Counsel of Record

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Counsel for Amber Laura Heard

Counsel for Amber Laura Heard

Counsel for Amber Laura Heard

# **ATTACHMENT NO. 3**

# John C. Depp, II v. Amber Laura Heard

Fairfax County Circuit Court: CL 2019-0002911

#### **DEFINITIONS**

- 1. Action. The term "Action" means the above-captioned action.
- 2. And/or. The use of "and/or" shall be interpreted in every instance both conjunctively and disjunctively in order to bring within the scope of these discovery requests any information which might otherwise be construed to be outside their scope.
- 3. Communication. The term "communication" means any oral or written exchange of words, thoughts, or ideas to another person, whether person-to-person, in a group, by phone, text (SMS), letter, fax, e-mail, internet post or correspondence, social networking post or correspondence or by any other process, electric, electronic, or otherwise. All such Communications are included without regard to the storage or transmission medium (electronically stored information and hard copies are included within this definition).
- 4. **Concerning.** The term "concerning" includes relating to, referring to, describing, evidencing, or constituting.
- 5. Correspondence. The term "correspondence" means any document(s) and/or communication(s) sent to or received from another entity and/or person.
- 6. **Defendant and/or Ms. Heard.** The terms "Defendant" and/or "Ms. Heard" refer to Defendant Amber Laura Heard, including her agents, representatives, employees, assigns, and all persons acting on her behalf.

- 7. **Document.** The term "document" is defined in its broadest terms currently recognized. The term shall include, without limitations: any written or other compilation of information (whether printed, handwritten, recorded, or encoded, produced, reproduced, or reproducible by any other process), drafts (revisions or finals), original or preliminary notes, and summaries of other documents, communications of any type (e-mail, text messages, blog posts, social media posts or other similar communications or correspondence), computer tape, computer files, and including all of their contents and attached files. The term "document" shall also include but not be limited to: correspondence, memoranda, contractual documents, specifications, drawings, photographs, images, aperture cards, notices of revisions, test reports, inspection reports, evaluations, technical reports, schedules, agreements, reports, studies, analyses, projections, forecasts, summaries, records of conversations or interviews, minutes or records of conferences or meetings, manuals, handbooks, brochures, pamphlets, advertisements, circulars, press releases, financial statements, calendars, diaries, trip reports, etc. A draft of a non-identical copy is a separate document within the meaning of this term.
  - 8. Including. The term "including" means including but not limited to.
- 9. *Person.* The term "person" is defined as any natural person, business, company, partnership, legal entity, governmental entity, and/or association.
- 10. Plaintiff and/or Mr. Depp. The terms "Plaintiff" and/or "Mr. Depp" refer to Plaintiff John C. Depp, II, including his agents, representatives, employees, assigns, and all persons acting on his behalf.
- 11. Requests. The term "Requests" shall mean the requests for documents to be produced under this Subpoena as set forth in this Attachment.

12. You and/or Your. The terms "You" and/or "Your" refer to the recipient of this Subpoena, as well as all persons and entities over which said recipient has "control" as understood by the Rules of this Court.

#### INSTRUCTIONS

- 1. Where information in Your possession is requested, such request includes non-privileged information in the possession of Your agent(s), employee(s), assign(s), representative(s), and all others acting on Your behalf.
- 2. Whenever appropriate in these Requests, the singular form of a word shall be interpreted as its plural to whatever extent is necessary to bring within the scope of these Requests any information which might otherwise be construed to be outside their scope.
- 3. Unless otherwise indicated, these Requests refer to the time, place, and circumstances of the occurrences mentioned or complained of in the pleadings in this case.
- 4. All references to an entity include the entity and its agents, officers, employees, representatives, subsidiaries, divisions, successors, predecessors, assigns, parents, affiliates, and unless privileged, its attorneys and accountants.
- 5. If You perceive any ambiguities in a question, instruction, definition, or other aspect of this Subpoena, set forth the matter deemed ambiguous and the construction used in answering.
- 6. If You assert a claim of privilege as to any of Your responses to the Requests, state the basis for the asserted privilege, specify the privilege claimed, and include in Your answer sufficient information to permit an informed ruling on the claim of privilege. If the claim relates to a privileged document, state the date, person or persons who prepared or participated in

preparing the document, the name and address of any person to whom the document was shown or sent, the general subject matter of the document, the present or last known location and custodian of the original of the document, and the basis for the claim of privilege with respect to the document. If the claim of privilege relates to a communication, state the date(s), place(s) and person(s) involved in the communication, the subject matter of the communication, and the basis for the claim of privilege with respect to that communication.

- 7. If You perceive any Request to be overly broad, unduly burdensome, or objectionable for any other reason, respond to the fullest extent possible and clearly note any objection so as to permit an informed ruling on the objection.
- 8. These Requests are continuing in character so as to require You to promptly amend or supplement Your production of documents within a reasonable time if You obtain or become aware of any further documents responsive to this Subpoena.

#### **DOCUMENTS TO BE PRODUCED UNDER THIS SUBPOENA**

In response to this subpoena, YOU are required to produce the original or an exact copy of the following:

- 1. All video footage recorded by the body worn camera of any officer relating to Incident No.

  LPD160521004756, including but not limited to any video footage recorded by the body worn

  cameras of Officer Melissa Saenz and/or Officer Tyler Hadden.
- 2. All video footage recorded by the body worn camera of any officer relating to Incident No. LPD160521005437.
- 3. All video footage recorded by the body worn camera of any officer relating to any incident at 849 S. Broadway, Los Angeles, CA 90014 on May 21, 2016, including but not limited to any

video footage recorded by the body worn cameras of Officer Melissa Saenz and/or Officer Tyler Hadden.

Q1	IR	D.	0.3	5

ATTORNEY OR PARTY WITHOUT ATTORNEY (Name, State Bar number, and address):  Davida Brook (SBN 275370)  Susman Godfrey L.L.P.  1900 Avenue of the Stars. Suite 1400. Los Angeles. CA 90067  TELEPHONE NO.: 37U-789-37UU  E-MAIL ADDRESS: dbrook@susmanqodfrey.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 Angeles  STREET ADDRESS: 111 N. Hill Street  MAILING ADDRESS:  CITY, STATE, 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, Virginia  STREET ADDRESS: 4110 Chain Bridge Road  MAILING ADDRESS:  CITY, STATE, AND ZIP CODE: Fairfax, VA 22030-4009  COUNTRY: United States	FOR COURT USE ONLY
PLAINTIFF/PETITIONER: JOHN C. DEPP, II DEFENDANT/RESPONDENT: AMBER LAURA HEARD	CALIFORNIA CASE NUMBER (if any assigned by court):
SUBPOENA FOR PRODUCTION OF BUSINESS RECORDS 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):
LAPD, Discovery Sect., Subpoena Duces Tecum Processing, 200 N. Spring St., 1900, LA, CA 90012

# 1. YOU ARE ORDERED TO PRODUCE THE BUSINESS RECORDS described in item 3, as follows: To (name of deposition officer): First Legal Records Retrieval On (date): 12/12/2019 At (time): 10:00 AM Location (address): 1511 Beverly Blvd, Los Angeles, CA 90026 Do not release the requested records to the deposition officer prior to the date and time stated above. a. by delivering a true, legible, and durable copy of the business records described in item 3, enclosed in a sealed inner wrapper with the title and number of the action, name of witness, and date of suppoena clearly written on it. The inner wrapper shall then be enclosed in an outer envelope or wrapper, sealed, and mailed to the deposition officer at the address in item 1. b. by delivering a true, legible, and durable copy of the business records described in item 3 to the deposition officer at the witness's address, on receipt of payment in cash or by check of the reasonable costs of preparing the copy, as determined under Evidence Code section 1563(b). c. \_\_\_\_ by making the original business records described in item 3 available for inspection at your business address by the attorney's representative and permitting copying at your business address under reasonable conditions during normal business hours. 2. The records are to be produced by the date and time shown in item 1 (but not sooner than 20 days after the issuance of the deposition subpoena, or 15 days after service, whichever date is later). Reasonable costs of locating records, making them available or copying them, and postage, if any, are recoverable as set forth in Evidence Code section 1563(b). The records must be accompanied by an affidavit of the custodian or other qualified witness pursuant to Evidence Code section 1561. 3. The records to be produced are described as follows (if electronically stored information is demanded, the form or forms in which each type of information is to be produced may be specified): See Attachment 3 ✓ Continued on Attachment 3 (use form MC-025). 4. Attorneys of record in this action or parties without attorneys are (name, address, telephone number, and name of party represented): See Attachment 4

Continued on Attachment 4 (use form MC-025).

		SUBP-035
PLAINTIFF/PETITIONER: JOHN C. DEPP, II	T	CASE NUMBER (of action pending outside California):
DEFENDANT/RESPONDENT: AMBER LAURA HEARD		
5. If you have been served with this subpoena as a custodia	bj€	ection has been served on you, a court order or agreement of
6. Other terms or provisions from out-of-state subpoena,	if	any (specify):
See Attachment 6		
Continued on Attachment 6 (use form MC-025).	!	
		AS CONTEMPT BY THIS COURT. YOU WILL ALSO BE LIABLE RESULTING FROM YOUR FAILURE TO OBEY.
Date issued: 11/25/2019		
Davida Brook	_	<u> </u>
(TYPE OR PRINT NAME)		(SIGNATURE OF PERSON ISSUING SUBPOENA)
	i	Attorney for Defendant Amber Laura Heard
PRODUCTION Of  1. I served this Subpoena for Production of Business Records to the person served as follows: a. Person served (name): b. Address where served:	FE	E OF SUBPOENA FOR BUSINESS RECORDS Action Pending Outside California by personally delivering a copy
Date of delivery:     Witness fees and mileage both ways (check one):	İ	d. Time of delivery:
(1) were paid. Amount: \$	<u> </u>	
(2) were not paid.		
(3) were tendered to the witness's public entity empartment amount tendered was (specify): \$	olc —	oyer as required by Government Code section 68097.2. The
f. Fee for service:	_	<u></u>
2. I received this subpoena for service on (date):		
by personally delivering a copy to the person served a		Consumer or Employee and Objection (form SUBP-025) described in 1 above.
<ul> <li>4. Person serving:</li> <li>a.  Not a registered California process server</li> <li>b.  California sheriff or marshal</li> <li>c.  Registered California process server</li> <li>d.  Employee or independent contractor of a registere</li> <li>e.  Exempt from registration under Business and Prof.  Registered professional photocopier</li> <li>g.  Exempt from registration under Business and Prof. Name, address, telephone number, and, if applicable, contractions are professional photocopier</li> </ul>	fe: ife:	ssions Code section 22350(b) ssions Code section 22451
I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.	f	(For California sheriff or marshal use only) I certify that the foregoing is true and correct.
Date:	Ŀ	Date:

(SIGNATURE)

(SIGNATURE)

MC-025 CASE NUMBER: SHORT TITLE: CL-2019-0002911 Depp v. Heard ATTACHMENT (Number): 3 (This Attachment may be used with any Judicial Council form.) See attached. Page \_\_1\_\_ of \_ (if the Item that this Attachment concerns is made under penalty of perjury, all statements in this Attachment are made under penalty of perjury.) (Add pages as required)



# John C. Depp, II v. Amber Laura Heard

Fairfax County Circuit Court: CL 2019-0002911

#### **DEFINITIONS**

- 1. Action. The term "Action" means the above-captioned action.
- 2. And/or. The use of "and/or" shall be interpreted in every instance both conjunctively and disjunctively in order to bring within the scope of these discovery requests any information which might otherwise be construed to be outside their scope.
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- 4. **Concerning.** The term "concerning" includes relating to, referring to, describing, evidencing, or constituting.
- 5. Correspondence. The term "correspondence" means any document(s) and/or communication(s) sent to or received from another entity and/or person.
- 6. **Defendant and/or Ms. Heard.** The terms "Defendant" and/or "Ms. Heard" refer to Defendant Amber Laura Heard, including her agents, representatives, employees, assigns, and all persons acting on her behalf.

!

- 7. **Document.** The term "document" is defined in its broadest terms currently recognized. The term shall include, without limitations: any written or other compilation of information (whether printed, handwritten, recorded, or encoded, produced, reproduced, or reproducible by any other process), drafts (revisions or finals), original or preliminary notes, and summaries of other documents, communications of any type (e-mail, text messages, blog posts, social media posts or other similar communications or correspondence), computer tape, computer files, and including all of their contents and attached files. The term "document" shall also include but not be limited to: correspondence, memoranda, contractual documents, specifications, drawings, photographs, images, aperture cards, notices of revisions, test reports, inspection reports, evaluations, technical reports, schedules, agreements, reports, studies, analyses, projections, forecasts, summaries, records of conversations or interviews, minutes or records of conferences or meetings, manuals, handbooks, brochures, pamphlets, advertisements, circulars, press releases, financial statements, calendars, diaries, trip reports, etc. A draft of a non-identical copy is a separate document within the meaning of this term.
  - 8. **Including.** The term "including" means including but not limited to.
- 9. **Person.** The term "person" is defined as any natural person, business, company, partnership, legal entity, governmental entity, and/or association.
- 10. Plaintiff and/or Mr. Depp. The terms "Plaintiff" and/or "Mr. Depp" refer to Plaintiff John C. Depp, II, including his agents, representatives, employees, assigns, and all persons acting on his behalf.
- 11. **Requests.** The term "Requests" shall mean the requests for documents to be produced under this Subpoena as set forth in this Attachment.

12. You and/or Your. The terms: "You" and/or "Your" refer to the recipient of this Subpoena, as well as all persons and entities over which said recipient has "control" as understood by the Rules of this Court.

#### INSTRUCTIONS

- 1. Where information in Your possession is requested, such request includes non-privileged information in the possession of Your agent(s), employee(s), assign(s), representative(s), and all others acting on Your behalf.
- 2. Whenever appropriate in these Requests, the singular form of a word shall be interpreted as its plural to whatever extent is necessary to bring within the scope of these Requests any information which might otherwise be construed to be outside their scope.
- 3. Unless otherwise indicated, these Requests refer to the time, place, and circumstances of the occurrences mentioned or complained of in the pleadings in this case.
- 4. All references to an entity include the entity and its agents, officers, employees, representatives, subsidiaries, divisions, successors, predecessors, assigns, parents, affiliates, and unless privileged, its attorneys and accountants.
- 5. If You perceive any ambiguities in a question, instruction, definition, or other aspect of this Subpoena, set forth the matter deemed ambiguous and the construction used in answering.
- 6. If You assert a claim of privilege as to any of Your responses to the Requests, state the basis for the asserted privilege, specify the privilege claimed, and include in Your answer sufficient information to permit an informed ruling on the claim of privilege. If the claim relates to a privileged document, state the date, person or persons who prepared or participated in

ı

preparing the document, the name and address of any person to whom the document was shown or sent, the general subject matter of the document, the present or last known location and custodian of the original of the document, and the basis for the claim of privilege with respect to the document. If the claim of privilege relates to a communication, state the date(s), place(s) and person(s) involved in the communication, the subject matter of the communication, and the basis for the claim of privilege with respect to that communication.

- 7. If You perceive any Request to be overly broad, unduly burdensome, or objectionable for any other reason, respond to the fullest extent possible and clearly note any objection so as to permit an informed ruling on the objection.
- 8. These Requests are continuing in character so as to require You to promptly amend or supplement Your production of documents within a reasonable time if You obtain or become aware of any further documents responsive to this Subpoena.

#### **DOCUMENTS TO BE PRODUCED UNDER THIS SUBPOENA**

In response to this subpoena, YOU are required to produce the original or an exact copy of the following:

- 1. All video footage recorded by the body worn camera of any officer relating to Incident No. LPD160521004756, including but not limited to any video footage recorded by the body worn cameras of Officer Melissa Saenz and/or Officer Tyler Hadden.
- 2. All video footage recorded by the body worn camera of any officer relating to Incident No. LPD160521005437.
- 3. All video footage recorded by the body worn camera of any officer relating to any incident at 849 S. Broadway, Los Angeles, CA 90014 on May 21, 2016, including but not limited to any

video footage recorded by the body worn cameras of Officer Melissa Saenz and/or Officer Tyler Hadden.

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

ATTACHMENT (Number): \_\_\_

(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

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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)

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Depp v. Heard

CASE NUMBER:

CL-2019-0002911

ATTACHMENT (Number): 5 Cont.

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

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J. Benjamin Rottenborn, Esq.
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Roanoke, VA 24011
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Sean Patrick Roche, Esq. (VSB No. 71412)
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(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)

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Depp v. Heard	<u>'</u>		CL-2019-00029	<del>/</del> 11
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See Attached.				
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BEN ROTTENBORN (540) 983-7540 brottenborn@woodsrogers.com

November 25, 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

Subpoena: LAPD

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 Subpoena for Production of Business Records 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

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

# Fairfax Circuit Court Circuit Court

# Receipt No. 868554

Receipt Date: 12/09/2019 10:23 AM

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			Joh	n T. Frey, Clerk of Circuit Court		
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			- •	Deputy Clerk		
				Clerk: TWOODE		