

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: <u>Hector Galindo</u>	
ADDRESS: <u>Macias Gini & O'Connell, LLP, 2029 Century Park East #1500</u> <u>Los Angeles, CA 90067</u>	
<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**

**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 HEARD

TO THE PERSON AUTHORIZED BY LAW TO SERVE THIS PROCESS:

You are commanded to summon

Hector Galindo

NAME

Macias Gini & O'Connell, LLP, 2029 Century Park East #1500

STREET ADDRESS

Los Angeles

CA

90067

CITY

STATE

ZIP

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

See Attachment A

FILED
CIVIL INTAKE
2021 OCT 22 AM 11:44
JOHN T. FREY
CLERK, CIRCUIT COURT
FAIRFAX, VA

First Legal Records

at 1511 Beverly Blvd., Los Angeles, CA 90026

LOCATION

at November 19, 2021 at 10:00 a.m.

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 and of parties not represented by counsel are provided below of

October 26, 2019
DATE ISSUED

J0

by

Benjamin G. Chew

29

NAME OF ATTORNEY FOR REQUESTING

B/

601 Thirteenth Street, N.W., Suite 600

OFFICE ADDRESS

TELEPHONE NUMBER OF ATTORNEY

Washington, DC 20005

(202) 536-1701

OFFICE ADDRESS

FACSIMILE NUMBER OF ATTORNEY

NAME

BAR NUMBER

LICENSING STATE

STREET ADDRESS

TELEPHONE NUMBER

STREET ADDRESS

FACSIMILE NUMBER

NAME

BAR NUMBER

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STREET ADDRESS

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NAME

BAR NUMBER

LICENSING STATE

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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)
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Camille M. Vasquez (*pro hac vice*)
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Facsimile: (212) 209-4801
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Counsel for Plaintiff and Counterclaim Defendant John C. Depp, II

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Adam S. Nadelhaft
Clarissa K. Pintado
David E. Murphy
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jcogger@grsm.com
kblocher@grsm.com
hpangan@grsm.com
mdailey@grsm.com

*Counsel for Defendant and Counterclaim
Plaintiff Amber Laura Heard*

1 6. “DIVORCE ACTION” shall mean and refer to the action entitled *In re the*
2 *Marriage of Amber Laura Depp and John Christopher Depp II*, Los Angeles Superior Court Case
3 No. BD641052.

4 7. “DOCUMENT” and/or “DOCUMENTS” unless otherwise indicated, are used in
5 their customarily broad sense and shall refer to and mean all writings and other tangible things of
6 any nature whatsoever, and shall include, but not be limited to, all writings (or drafts thereof),
7 COMMUNICATIONS, medical records, drawings, graphs, charts, photographs, phone records,
8 other data compilations or storage devices from which information can be obtained (even if such
9 information must be translated into a reasonably usable form), magnetically recorded or stored
10 information generated by a computer, contracts, agreements, communications, correspondence,
11 telegrams, memoranda, records, reports, books, summaries or records of telephone conversations,
12 summaries or records of personal conversations or interviews, diaries, forecasts, statistical
13 statements, work papers, drafts, accounts, analytical records, minutes or records of meetings or
14 conferences, records, reports or summaries of negotiations, brochures, pamphlets, circulars,
15 calendars, notes, marginal notations, bills, invoices, checks, lists, journals, advertising, and all
16 other written, printed, recorded or photographic matter or sound reproductions, or tangible
17 representations of things, however produced or reproduced, including ELECTRONICALLY
18 STORED INFORMATION and all nonidentical copies of the foregoing.

19 8. “MR. DEPP” means and refers to Plaintiff John C. Depp, II.

20 9. “MS. HEARD” means and refers to Defendant Amber Laura Heard.

21 10. “PERSON” and/or “PERSONS” shall be broadly construed to include all natural
22 and artificial persons.

23 11. “PROFESSIONAL ACTIVITIES” shall mean and refer to all of MS. HEARD’s
24 professional activities, to include without limitation her involvement in any capacity (as an actress
25 or otherwise) with any films, television programs, theatre performances, advertisements, public
26 appearances, speeches, publications, and social media.

27 12. “PROFESSIONAL OPPORTUNITIES” shall mean and refer to any potential
28 involvement by MS. HEARD with any films, television programs, theatre performances,

1 advertisements, public appearances, speeches, publications, and social media.

2 13. "THE SUN CASE" shall mean and refer to the action entitled *John Christopher*
3 *Depp II and News Group Newspapers LTD and Dan Wooton*, The High Court of Justice Queen's
4 Bench Division Media and Communications List, Claim No. QB-2018-006323.

5 14. "MR. WALDMAN" shall mean and refer to Adam Waldman.

6 **INSTRUCTIONS**

7 15. When necessary, the singular form of a word shall be interpreted as plural, and the
8 masculine gender shall be deemed to include the feminine, in order to bring within the scope any
9 DOCUMENTS which might otherwise be construed to be outside the scope of these Requests.
10 The terms, "and" and "or," have both conjunctive and disjunctive meanings, and "each," "any,"
11 and "all" mean "each and every."

12 16. All undefined terms shall be interpreted according to their plain and commonsense
13 meaning.

14 17. DOCUMENTS should be produced as single page .tiff format files imaged at 300
15 dpi, with the exception of stand-alone Databases (e.g., Access), spreadsheets (e.g., Excel), slide
16 presentations (e.g., PowerPoint), video files, and audio files, which should be produced in native
17 format. Each .tiff file should have a unique name matching the Bates number labeled on the
18 corresponding page. Color DOCUMENTS should be produced in color.

19 18. DOCUMENTS should be produced with (a) a delimited data file (.dat), and (b) an
20 image load file (.opt and/or .lfp). Each .tiff in a production must be referenced in the
21 corresponding image load file. The total number of documents referenced in a production's data
22 load file should match the total number of designated document breaks in the image load file for
23 the production.

24 19. DOCUMENTS should be produced with extracted metadata for each DOCUMENT
25 in the form of a .dat file. The metadata should include the following fields, to the extent such
26 fields are available in the original DOCUMENT as it originally existed in its native format:

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Field	Description
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Bates_Begin	The bates label of the first page of the document
Bates_End	The bates label of the last page of the document
Attach_Begin	The bates label of the first page of a family of documents (e.g., email and attachment)
Attach_End	The bates label of the last page of a family of documents
Sent_Date	For email, the sent date of the message
Sent_Time	For email, the sent time of the message converted to GMT
Email_Author	The sender of an email message (email FROM)
Recipient	The recipients of an email message (email TO)
CC	The recipients of a copy of an email message (email CC)
BCC	The recipients of a blind copy of an email message (email BCC)
Custodian	The custodian in whose file the document was found, including all duplicate custodians
Datercvd	Date received
Datesent	Date sent
Subject	E-mail subject
Author	The person who created the document
Modifier	The person who last modified the document
Created	The creation date of the document
Last_Modified	The last modified date of the document
Title	The title of the document

1	File_Name	The name of the file
2	File_Extension	The file extension of the document
3	MD5Hash	The MD5 Hash Value of the document
4	Message_ID	The Message ID of the email and/or attachment
5	Mailstore	The name of the Mailstore in which the email and/or
6		attachment is contained
7	File_Size	The size of the file
8	File_Path	Original file path of the document as it existed in the normal
9		course of business or the folder location if the
10		document/email is contained in a Mailstore
11	Number_Pages	The number of pages in the document
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15 20. All DOCUMENTS attached to and/or embedded in an e-mail and/or other
16 DOCUMENT must be produced contemporaneously and sequentially after the parent e-
17 mail/document.

18 21. In producing DOCUMENTS, you shall furnish all DOCUMENTS in your
19 possession, custody, or control. Without limitation of the term "control," a DOCUMENT is
20 deemed to be in your control if you have the right to secure the DOCUMENT or a copy thereof
21 from another person or public or private entity having actual possession thereof, or if you have the
22 practical ability to obtain the DOCUMENT from a third-party, irrespective of any legal
23 entitlement to the DOCUMENT. If any original DOCUMENT requested is not in your possession,
24 custody, or control, then you are required to produce the best available copy, and to state, to the
25 best of your knowledge, the name and address of the person in possession and/or control of the
26 original. The fact that a DOCUMENT is in possession of another person or entity does not relieve
27 you of the obligation to produce your copy of the DOCUMENT, even if the two DOCUMENTS
28 are identical. In addition, any copy of a DOCUMENT shall be produced if it differs in any respect

1 from the original (e.g., by reason of handwritten notes or comments having been added to copy
2 which do not appear on the original or otherwise).

3 22. If responsive DOCUMENTS no longer exist because they have been destroyed,
4 cannot be located, or are otherwise no longer in your possession or subject to your control,
5 identify each DOCUMENT and describe the circumstances under which it was lost or destroyed.

6 23. All DOCUMENTS should be organized and labeled to correspond by number with
7 the numbered categories set forth in these Requests. If a DOCUMENT is responsive to more than
8 one Request, reference that DOCUMENT in your written response to each Request to which it is
9 responsive or in a load file identifying the same.

10 24. A Request for a DOCUMENT shall be deemed to include a request for any and all
11 file folders within which the DOCUMENT was contained, transmittal sheets, cover letters,
12 exhibits, enclosures, or attachments to the DOCUMENT in addition to the DOCUMENT itself.

13 25. If you claim that any DOCUMENT is, in whole or in part, beyond the scope of
14 permissible discovery (including but not limited to any claim of privilege or confidentiality),
15 specify in detail each and every ground on which such claim rests and identify generally what the
16 document is. If you assert any claim of privilege, then at the time of production you are to furnish
17 a privilege log that specifically identifies each DOCUMENT (or portion) withheld by (a) date, (b)
18 author, (c) recipient, (d) persons copied, (e) general description of the subject matter of the
19 DOCUMENT, and (f) a statement of the specific privilege claimed and the basis upon which such
20 privilege is claimed as to each separate DOCUMENT (or portion) withheld. The privilege log
21 should contain enough specificity, but without disclosing privileged information, to allow
22 Plaintiffs and the Court to adequately assess the privilege claimed.

23 26. To the extent you consider any portion of the following Requests to be
24 objectionable, (a) identify the portion of the Request claimed to be objectionable, (b) state the
25 nature and basis of the objection, and (c) produce DOCUMENTS responsive to any portion of
26 such Request that is not claimed to be objectionable.

27 27. If you believe that any Request is unclear, unintelligible, or because of its wording
28 otherwise prevents you from responding fully to that Request, identify the ambiguity or source of

1 confusion and explain the definition and understanding that you relied upon in responding. It shall
2 be insufficient to object to a particular Request on the grounds that it is vague, ambiguous, or
3 otherwise unclear, and withhold DOCUMENTS on that basis without seeking clarification.

4 28. Unless otherwise stated, the timeframe of these requests is January 1, 2010 through
5 and including the present.

6 **DOCUMENT REQUESTS**

7 **REQUEST NO. 1:**

8 DOCUMENTS sufficient to show MS. HEARD's total annual income from
9 PROFESSIONAL ACTIVITIES in each year from January 1, 2010 through and including the
10 present.

11 **REQUEST NO. 2:**

12 All DOCUMENTS that evidence or reflect any decline in MS. HEARD's income from
13 PROFESSIONAL ACTIVITIES after May 21, 2016 through the present.

14 **REQUEST NO. 3:**

15 All DOCUMENTS that evidence or reflect any increase in MS. HEARD's income from
16 PROFESSIONAL ACTIVITIES after May 21, 2016 through the present.

17 **REQUEST NO. 4:**

18 DOCUMENTS sufficient to show MS. HEARD's compensation from each film or
19 television program with which she has been professionally involved from January 1, 2010 through
20 and including the present.

21 **REQUEST NO. 5:**

22 All contracts that memorialize or reflect MS. HEARD's compensation from any
23 PROFESSIONAL ACTIVITIES from January 1, 2010 through and including the present.

24 **REQUEST NO. 6:**

25 All DOCUMENTS that memorialize or reflect MS. HEARD's potential compensation
26 from any PROFESSIONAL OPPORTUNITIES that were offered to her but not accepted from
27 January 1, 2010 through and including the present.

28 ///.

1 **REQUEST NO. 7:**

2 All COMMUNICATIONS with MS. HEARD regarding MR. DEPP.

3 **REQUEST NO. 8:**

4 All COMMUNICATIONS with MS. HEARD regarding MR. WALDMAN.

5 **REQUEST NO. 9:**

6 All COMMUNICATIONS with MS. HEARD regarding the DEFAMATION ACTION.

7 **REQUEST NO. 10:**

8 All COMMUNICATIONS with MS. HEARD regarding the DIVORCE ACTION.

9 **REQUEST NO. 11:**

10 All COMMUNICATIONS with MS. HEARD regarding the SUN CASE.

11 **REQUEST NO. 12:**

12 All DOCUMENTS and COMMUNICATIONS concerning the relationship between MR.
13 DEPP and MS. HEARD.

14 **REQUEST NO. 13:**

15 All DOCUMENTS and COMMUNICATIONS regarding any of the COUNTERCLAIM
16 STATEMENTS.

17 **REQUEST NO. 14:**

18 All DOCUMENTS and COMMUNICATIONS regarding MS. HEARD's allegations of
19 abuse against MR. DEPP.

20 **REQUEST NO. 15:**

21 All DOCUMENTS and COMMUNICATIONS regarding MR. DEPP's allegations of
22 abuse against MS. HEARD.

23 **REQUEST NO. 16:**

24 All DOCUMENTS and COMMUNICATIONS related to any PROFESSIONAL
25 OPPORTUNITIES offered to MS. HEARD from May 21, 2016 through and including the present.

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1 **REQUEST NO. 17:**

2 All DOCUMENTS and COMMUNICATIONS that evidence or reflect any
3 PROFESSIONAL OPPORTUNITIES lost by MS. HEARD from May 21, 2016 through and
4 including the present.
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<p>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.: (949) 252-1514 E-MAIL ADDRESS: lpresiado@brownrudnick.com /cvasquez@brownrudnick.com ATTORNEY FOR (Name): John C. Depp, II</p>	<p>FOR COURT USE ONLY</p>
<p>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, STATE, AND ZIP CODE: Los Angeles 90012 BRANCH NAME: Stanley Mosk</p>	
<p>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</p>	
<p>PLAINTIFF/PETITIONER: John C. Depp, II DEFENDANT/RESPONDENT: Amber Laura Heard</p>	<p>CALIFORNIA CASE NUMBER (if any assigned by court): 19STCP04763</p>
<p>SUBPOENA FOR PRODUCTION OF BUSINESS RECORDS IN ACTION PENDING OUTSIDE CALIFORNIA</p>	<p>CASE NUMBER (of action pending outside California): CL-2019-0002911</p>

THE PEOPLE OF THE STATE OF CALIFORNIA, TO (name, address, and telephone number of deponent, if known):
 Hector Galindo, Macias Gini & O'Connell, LLP, 2029 Century Park East #1500, Los Angeles, CA 90067

1. YOU ARE ORDERED TO PRODUCE THE BUSINESS RECORDS described in item 3, as follows:

<p>To (name of deposition officer): First Legal Records On (date): November 19, 2021 At (time): 10:00 a.m. Location (address): 1511 Beverly Blvd., Los Angeles, CA 90026</p> <p>Do not release the requested records to the deposition officer prior to the date and time stated above.</p>
--

- 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 subpoena 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).

1 ATTACHMENT 3

2 DEFINITIONS

3 1. "YOU" and/or "YOUR" shall mean and refer to Hector Galindo.

4 2. "COMMUNICATION" and/or "COMMUNICATIONS" shall mean and refer to
5 any written and/or verbal exchanges between any person or persons or entities, including but not
6 limited to verbal conversations, telephone calls, letters, e-mails, memoranda, reports, telegraphs,
7 faxes, exhibits, drawings, text messages, and any other documents which confirm or relate to the
8 written or verbal exchange, including applicable ELECTRONICALLY STORED
9 INFORMATION.

10 3. "COUNTERCLAIM STATEMENTS" shall mean and refer to the alleged
11 statements by MR. DEPP and/or MR. WALDMAN that are the basis of MS. HEARD's pending
12 Counterclaim in the DEFAMATION ACTION.

13 4. "ELECTRONICALLY STORED INFORMATION" means data that is stored in an
14 electronic medium and shall include, by way of example only, computer programs, electronic mail
15 (including message contents, header information and logs of electronic mail usage), output
16 resulting from the use of any software program, including electronic, digital, or any other recorded
17 material whatsoever, including but not limited to, any notes, memoranda, videotapes, affidavits,
18 statements, papers, files, forms, data, tapes, printouts, letters, reports, communications, contracts,
19 agreements, telegrams, records, financial records, applications, correspondence, diaries, calendars,
20 recordings and transcriptions of recordings, voice mail messages recorded electronically and in
21 writing, email messages and printouts, photographs, diagrams, or any other writings, however
22 produced or reproduced, word processing documents, spreadsheets, databases, telephone logs,
23 contact manager information, Internet usage files, PDF files, .JPG files, .TIF files, .TXT files,
24 batch files, ASCII files, and any and all miscellaneous files and data and shall include all active
25 data, deleted data, file fragments, metadata, native file formats and forensic images thereof.

26 5. "DEFAMATION ACTION" shall mean and refer to the action entitled *John C.*
27 *Depp II v. Amber Laura Heard*, Circuit Court of Fairfax County Virginia Civil Action No. CL-
28 2019-0002911.

1 6. “DIVORCE ACTION” shall mean and refer to the action entitled *In re the*
2 *Marriage of Amber Laura Depp and John Christopher Depp II*, Los Angeles Superior Court Case
3 No. BD641052.

4 7. “DOCUMENT” and/or “DOCUMENTS” unless otherwise indicated, are used in
5 their customarily broad sense and shall refer to and mean all writings and other tangible things of
6 any nature whatsoever, and shall include, but not be limited to, all writings (or drafts thereof),
7 COMMUNICATIONS, medical records, drawings, graphs, charts, photographs, phone records,
8 other data compilations or storage devices from which information can be obtained (even if such
9 information must be translated into a reasonably usable form), magnetically recorded or stored
10 information generated by a computer, contracts, agreements, communications, correspondence,
11 telegrams, memoranda, records, reports, books, summaries or records of telephone conversations,
12 summaries or records of personal conversations or interviews, diaries, forecasts, statistical
13 statements, work papers, drafts, accounts, analytical records, minutes or records of meetings or
14 conferences, records, reports or summaries of negotiations, brochures, pamphlets, circulars,
15 calendars, notes, marginal notations, bills, invoices, checks, lists, journals, advertising, and all
16 other written, printed, recorded or photographic matter or sound reproductions, or tangible
17 representations of things, however produced or reproduced, including ELECTRONICALLY
18 STORED INFORMATION and all nonidentical copies of the foregoing.

19 8. “MR. DEPP” means and refers to Plaintiff John C. Depp, II.

20 9. “MS. HEARD” means and refers to Defendant Amber Laura Heard.

21 10. “PERSON” and/or “PERSONS” shall be broadly construed to include all natural
22 and artificial persons.

23 11. “PROFESSIONAL ACTIVITIES” shall mean and refer to all of MS. HEARD’s
24 professional activities, to include without limitation her involvement in any capacity (as an actress
25 or otherwise) with any films, television programs, theatre performances, advertisements, public
26 appearances, speeches, publications, and social media.

27 12. “PROFESSIONAL OPPORTUNITIES” shall mean and refer to any potential
28 involvement by MS. HEARD with any films, television programs, theatre performances,

1 advertisements, public appearances, speeches, publications, and social media.

2 13. "THE SUN CASE" shall mean and refer to the action entitled *John Christopher*
3 *Depp II and News Group Newspapers LTD and Dan Wooton*, The High Court of Justice Queen's
4 Bench Division Media and Communications List, Claim No. QB-2018-006323.

5 14. "MR. WALDMAN" shall mean and refer to Adam Waldman.

6 **INSTRUCTIONS**

7 15. When necessary, the singular form of a word shall be interpreted as plural, and the
8 masculine gender shall be deemed to include the feminine, in order to bring within the scope any
9 DOCUMENTS which might otherwise be construed to be outside the scope of these Requests.
10 The terms, "and" and "or," have both conjunctive and disjunctive meanings, and "each," "any,"
11 and "all" mean "each and every."

12 16. All undefined terms shall be interpreted according to their plain and commonsense
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15 dpi, with the exception of stand-alone Databases (e.g., Access), spreadsheets (e.g., Excel), slide
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21 corresponding image load file. The total number of documents referenced in a production's data
22 load file should match the total number of designated document breaks in the image load file for
23 the production.

24 19. DOCUMENTS should be produced with extracted metadata for each DOCUMENT
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Field	Description
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Bates_Begin	The bates label of the first page of the document
Bates_End	The bates label of the last page of the document
Attach_Begin	The bates label of the first page of a family of documents (e.g., email and attachment)
Attach_End	The bates label of the last page of a family of documents
Sent_Date	For email, the sent date of the message
Sent_Time	For email, the sent time of the message converted to GMT
Email_Author	The sender of an email message (email FROM)
Recipient	The recipients of an email message (email TO)
CC	The recipients of a copy of an email message (email CC)
BCC	The recipients of a blind copy of an email message (email BCC)
Custodian	The custodian in whose file the document was found, including all duplicate custodians
Datercvd	Date received
Datesent	Date sent
Subject	E-mail subject
Author	The person who created the document
Modifier	The person who last modified the document
Created	The creation date of the document
Last_Modified	The last modified date of the document
Title	The title of the document

1	File_Name	The name of the file
2	File_Extension	The file extension of the document
3	MD5Hash	The MD5 Hash Value of the document
4	Message_ID	The Message ID of the email and/or attachment
5	Mailstore	The name of the Mailstore in which the email and/or
6		attachment is contained
7	File_Size	The size of the file
8	File_Path	Original file path of the document as it existed in the normal
9		course of business or the folder location if the
10		document/email is contained in a Mailstore
11	Number_Pages	The number of pages in the document
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15 20. All DOCUMENTS attached to and/or embedded in an e-mail and/or other
16 DOCUMENT must be produced contemporaneously and sequentially after the parent e-
17 mail/document.

18 21. In producing DOCUMENTS, you shall furnish all DOCUMENTS in your
19 possession, custody, or control. Without limitation of the term "control," a DOCUMENT is
20 deemed to be in your control if you have the right to secure the DOCUMENT or a copy thereof
21 from another person or public or private entity having actual possession thereof, or if you have the
22 practical ability to obtain the DOCUMENT from a third-party, irrespective of any legal
23 entitlement to the DOCUMENT. If any original DOCUMENT requested is not in your possession,
24 custody, or control, then you are required to produce the best available copy, and to state, to the
25 best of your knowledge, the name and address of the person in possession and/or control of the
26 original. The fact that a DOCUMENT is in possession of another person or entity does not relieve
27 you of the obligation to produce your copy of the DOCUMENT, even if the two DOCUMENTS
28 are identical. In addition, any copy of a DOCUMENT shall be produced if it differs in any respect

1 from the original (e.g., by reason of handwritten notes or comments having been added to copy
2 which do not appear on the original or otherwise).

3 22. If responsive DOCUMENTS no longer exist because they have been destroyed,
4 cannot be located, or are otherwise no longer in your possession or subject to your control,
5 identify each DOCUMENT and describe the circumstances under which it was lost or destroyed.

6 23. All DOCUMENTS should be organized and labeled to correspond by number with
7 the numbered categories set forth in these Requests. If a DOCUMENT is responsive to more than
8 one Request, reference that DOCUMENT in your written response to each Request to which it is
9 responsive or in a load file identifying the same.

10 24. A Request for a DOCUMENT shall be deemed to include a request for any and all
11 file folders within which the DOCUMENT was contained, transmittal sheets, cover letters,
12 exhibits, enclosures, or attachments to the DOCUMENT in addition to the DOCUMENT itself.

13 25. If you claim that any DOCUMENT is, in whole or in part, beyond the scope of
14 permissible discovery (including but not limited to any claim of privilege or confidentiality),
15 specify in detail each and every ground on which such claim rests and identify generally what the
16 document is. If you assert any claim of privilege, then at the time of production you are to furnish
17 a privilege log that specifically identifies each DOCUMENT (or portion) withheld by (a) date, (b)
18 author, (c) recipient, (d) persons copied, (e) general description of the subject matter of the
19 DOCUMENT, and (f) a statement of the specific privilege claimed and the basis upon which such
20 privilege is claimed as to each separate DOCUMENT (or portion) withheld. The privilege log
21 should contain enough specificity, but without disclosing privileged information, to allow
22 Plaintiffs and the Court to adequately assess the privilege claimed.

23 26. To the extent you consider any portion of the following Requests to be
24 objectionable, (a) identify the portion of the Request claimed to be objectionable, (b) state the
25 nature and basis of the objection, and (c) produce DOCUMENTS responsive to any portion of
26 such Request that is not claimed to be objectionable.

27 27. If you believe that any Request is unclear, unintelligible, or because of its wording
28 otherwise prevents you from responding fully to that Request, identify the ambiguity or source of

1 confusion and explain the definition and understanding that you relied upon in responding. It shall
2 be insufficient to object to a particular Request on the grounds that it is vague, ambiguous, or
3 otherwise unclear, and withhold DOCUMENTS on that basis without seeking clarification.

4 28. Unless otherwise stated, the timeframe of these requests is January 1, 2010 through
5 and including the present.

6 **DOCUMENT REQUESTS**

7 **REQUEST NO. 1:**

8 DOCUMENTS sufficient to show MS. HEARD's total annual income from
9 PROFESSIONAL ACTIVITIES in each year from January 1, 2010 through and including the
10 present.

11 **REQUEST NO. 2:**

12 All DOCUMENTS that evidence or reflect any decline in MS. HEARD's income from
13 PROFESSIONAL ACTIVITIES after May 21, 2016 through the present.

14 **REQUEST NO. 3:**

15 All DOCUMENTS that evidence or reflect any increase in MS. HEARD's income from
16 PROFESSIONAL ACTIVITIES after May 21, 2016 through the present.

17 **REQUEST NO. 4:**

18 DOCUMENTS sufficient to show MS. HEARD's compensation from each film or
19 television program with which she has been professionally involved from January 1, 2010 through
20 and including the present.

21 **REQUEST NO. 5:**

22 All contracts that memorialize or reflect MS. HEARD's compensation from any
23 PROFESSIONAL ACTIVITIES from January 1, 2010 through and including the present.

24 **REQUEST NO. 6:**

25 All DOCUMENTS that memorialize or reflect MS. HEARD's potential compensation
26 from any PROFESSIONAL OPPORTUNITIES that were offered to her but not accepted from
27 January 1, 2010 through and including the present.

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1 **REQUEST NO. 7:**

2 All COMMUNICATIONS with MS. HEARD regarding MR. DEPP.

3 **REQUEST NO. 8:**

4 All COMMUNICATIONS with MS. HEARD regarding MR. WALDMAN.

5 **REQUEST NO. 9:**

6 All COMMUNICATIONS with MS. HEARD regarding the DEFAMATION ACTION.

7 **REQUEST NO. 10:**

8 All COMMUNICATIONS with MS. HEARD regarding the DIVORCE ACTION.

9 **REQUEST NO. 11:**

10 All COMMUNICATIONS with MS. HEARD regarding the SUN CASE.

11 **REQUEST NO. 12:**

12 All DOCUMENTS and COMMUNICATIONS concerning the relationship between MR.
13 DEPP and MS. HEARD.

14 **REQUEST NO. 13:**

15 All DOCUMENTS and COMMUNICATIONS regarding any of the COUNTERCLAIM
16 STATEMENTS.

17 **REQUEST NO. 14:**

18 All DOCUMENTS and COMMUNICATIONS regarding MS. HEARD's allegations of
19 abuse against MR. DEPP.

20 **REQUEST NO. 15:**

21 All DOCUMENTS and COMMUNICATIONS regarding MR. DEPP's allegations of
22 abuse against MS. HEARD.

23 **REQUEST NO. 16:**

24 All DOCUMENTS and COMMUNICATIONS related to any PROFESSIONAL
25 OPPORTUNITIES offered to MS. HEARD from May 21, 2016 through and including the present.

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1 **REQUEST NO. 17:**

2 All DOCUMENTS and COMMUNICATIONS that evidence or reflect any
3 PROFESSIONAL OPPORTUNITIES lost by MS. HEARD from May 21, 2016 through and
4 including the present.

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SHORT TITLE: John C. Depp, II v. Amber Laura Heard	CASE NUMBER: CL-2019-0002911
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ATTACHMENT (Number): 4*(This Attachment may be used with any Judicial Council form.)*

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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 1 of 1

(Add pages as required)

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this 22nd day of October 2021, I caused copies of the foregoing to be served via email (per written agreement between the Parties) on the following:

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