

VIRGINIA:

IN THE CIRCUIT COURT OF FAIRFAX COUNTY

JOHN C. DEPP, II,

Plaintiff and Counterclaim
Defendant,

v.

AMBER LAURA HEARD,

Defendant and Counterclaim
Plaintiff.

Civil Action No.: CL-2019-0002911

FILED
CIVIL PROCESSING
2022 MAR 29 10 33 AM
JOHN T. FREY
CLERK, CIRCUIT COURT
FAIRFAX, VA

**PLAINTIFF AND COUNTERCLAIM DEFENDANT JOHN C. DEPP, II'S
OBJECTIONS TO DEFENDANT AND COUNTERCLAIM PLAINTIFF
AMBER LAURA HEARD'S WITNESS LIST**

COMES NOW Plaintiff and Counterclaim Defendant John C. Depp, II ("Plaintiff" or "Mr. Depp), by counsel, hereby objects to the witnesses identified by Amber Laura Heard ("Ms. Heard" or "Plaintiff") as set forth below. The Objections identified below are not intended to reflect all objections pertinent to the witness' potential testimony or related documents; objections to particular testimony, the appropriate scope and subject of testimony, and any particular documents, are expressly reserved. Furthermore, the fact that a particular witness is not objected to below is not intended and should not be construed as a concession that such witness' testimony is relevant, appropriate, admissible, or otherwise necessary for the trier of fact. Mr. Depp reserves the right to withdraw, supplement, or otherwise modify the below objections as appropriate, including based on developments at trial or in pre-trial rulings.

Name

Objections

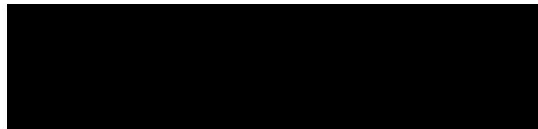
Ackert, Julian	Objection. Mr. Ackert should be excluded entirely for the reasons set forth in Mr. Depp's pending Motion <i>in Limine</i> (No. 19) and Motion for Sanctions.
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Arnold, Kathryn	Objection. Ms. Arnold should be excluded or her testimony limited for the reasons set forth in Mr. Depp's pending Motion <i>in Limine</i> (No. 15).
Banks, Amy	Objection. Ms. Banks' testimony should be excluded in its entirety for the reasons set forth in Mr. Depp's pending Motion <i>in Limine</i> (No. 23).
Barkin, Ellen	Objection. Ms. Barkin's testimony should be excluded in its entirety for the reasons set forth in Mr. Depp's pending Motion <i>in Limine</i> (No. 13).
Bercovici, Adam	Objection. Mr. Bercovici's testimony should be excluded in its entirety for the reasons set forth in Mr. Depp's pending Motion <i>in Limine</i> (No. 12).
Bloom, Jacob	Objection. Mr. Bloom should be excluded on relevance grounds and for the reasons set forth in Mr. Depp's pending Motion <i>in Limine</i> (No. 11).
Brooks, Natasha	Objection. Defendant has identified Ms. Brooks as a witness that will testify by deposition designation, but failed to designate any of Ms. Brooks' deposition testimony; and Ms. Brooks has no firsthand knowledge or relevant testimony.
Custodian of Records/Corporate Designee – Action Property Management	Objection. Improper designation of custodian declaration. All objections to particular documents and sufficiency of declaration are reserved.
Custodian of Records/Corporate Designee – Pegasus Elite Aviation	Objection. Improper designation of custodian declaration, not appropriately included on witness list. All objections to particular documents and sufficiency of declaration are reserved.
Custodian of Records/Corporate Designee – Warner Brothers Entertainment, Inc.	Objection. Improper designation of custodian declaration, not appropriately included on witness list. All objections to particular documents and sufficiency of declaration are reserved.
Custodian of Records/Corporate Designee – LAPD	Objection. Improper designation of custodian declaration, not appropriately included on witness list. All objections to particular documents and sufficiency of declaration are reserved.
Corporate Designee – William Morris Endeavor Entertainment, LLC	Objection. Improper designation of custodian declaration, not appropriately included on witness list. All objections to particular documents and sufficiency of declaration are reserved.
Custodian of Records/Corporate Designee – American Civil Liberties Union	Objection. Improper designation of custodian declaration, not appropriately included on witness list. All objections to particular documents and sufficiency of declaration are reserved.
Custodian of Records/Corporate Designee – Children's Hospital of Los Angeles	Objection. Improper designation of custodian declaration, not appropriately included on witness list. All objections to particular documents and sufficiency of declaration are reserved.

Custodian of Records/Corporate Designee – Walt Disney Motion Pictures Group, Inc.	Objection. Improper designation of custodian declaration, not appropriately included on witness list. All objections to particular documents and sufficiency of declaration are reserved.
Gottlieb, Jodi	Objection. Ms. Gottlieb was never produced for deposition despite having been served with a valid subpoena. Indeed, Ms. Gottlieb is in open contempt of a California subpoena. Moreover, she was in communication with Ms. Heard’s counsel prior to failing to appear for her deposition. Ms. Gottlieb should be excluded entirely. In the alternative, Ms. Gottlieb should not be permitted to testify without sitting for deposition by Mr. Depp’s counsel.
Harrell, Cornelius	Objection. Relevance.
Henriquez, Whitney	<p>Objection. Ms. Henriquez is represented in this action by Ms. Heard’s counsel. When Ms. Henriquez was deposed in this action, Ms. Heard’s counsel cut short her deposition after a mere 3.5 hours, and then represented to counsel for Mr. Depp that Ms. Henriquez was unable to resume the deposition for an extended period of time for medical reasons, while also asserting that Ms. Heard’s counsel intended to consume any remaining time at deposition by posing questions to their own client. The Monday after the Friday March 11, 2022, discovery cutoff, Ms. Heard’s counsel subsequently offered Ms. Henriquez for deposition, but continued to insist that Ms. Heard’s counsel would consume the questioning time.</p> <p>Ms. Henriquez should be excluded entirely due to Ms. Heard’s counsel’s deliberate and blatant efforts to obstruct her deposition. In the alternative, she should be required to sit for a further 3.5 hours of deposition by Mr. Depp’s counsel, before being allowed to testify at trial.</p>
Hughes, Dawn	Objection. Dr. Hughes’ testimony should be excluded or limited for the reasons set forth in Mr. Depp’s pending Motion in Limine (No. 18).
Kouvelis, Peter (Sgt.) (PMK – Los Angeles Police Department)	Objection. Peter Kouvelis should be excluded for the reasons set forth in Mr. Depp’s pending Motion in Limine (No. 3).
Lemoyne, Armand (Sgt.) (PMK – Los Angeles Police Department)	Objection. Armand LeMoyne should be excluded for the reasons set forth in Mr. Depp’s pending Motion in Limine (No. 3).

Lopez, Roberto (Officer) (PMK – Los Angeles Police Department)	Objection. Roberto Lopez should be excluded for the reasons set forth in Mr. Depp’s pending Motion in Limine (No. 3).
Mandel, Joel	Objection. Joel Mandel should be excluded on relevance grounds.
Newman, Tina (PMK - Walt Disney Motion Pictures Group, Inc.)	Objection. Relevance, Lack of Personal Knowledge.
Sandanaga, Marie (LAPD)	Objection. Ms. Sadanaga should be excluded for the reasons set forth in Mr. Depp’s pending Motion in Limine (No. 3).
Schnell, Ronald	Objection. Mr. Schnell should be excluded for the reasons set forth in Mr. Depp’s pending Motion in Limine (No. 15).
Spiegel, David	Objection. Mr. Spiegel should be excluded for the reasons set forth in Mr. Depp’s pending Motion in Limine (No. 14).

Respectfully submitted,



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Dated: March 29, 2022

CERTIFICATE OF SERVICE

I hereby certify that on this 29th day of March 2022, I caused copies of the foregoing to be served via email (per written agreement between the Parties) on the following:

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