

[] 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: LAPD Corporate Designee, SDT Processing Unit	
ADDRESS: 200 N. Spring St., Suite 1900 Los Angeles, CA 90012	
<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. 2019-002911

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

Fairfax County

Circuit Court

4110 Chain Bridge Road, 3rd Floor, Fairfax, VA 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

LAPD CORPORATE DESIGNEE

NAME

SDT Processing Unit, 200 N. Spring St., Suite 1900

STREET ADDRESS

Los Angeles

CA

90012

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

FILED
CIVIL INTAKE
2020 AUG 17 PM 3:06
JOHN T. FREY
CLERK
FAIRFAX, VA

at Gordon Rees, 633 West Fifth Street, 52nd Floor, Los Angeles, CA 90071

LOCATION

at September 14, 2020 at 9:00am

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

Defendant Amber Laura Heard

NAME OF REQUESTING PARTY

c/o Charlson Bredehoff Cohen & Brown, P.C., 11260 Roger Bacon Drive, Suite 201

STREET ADDRESS

Reston

VA

20190

703-318-6800

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.

August 19th, 2020
DATE ISSUED

JOHN T. FREY, CLERK

by [REDACTED]
DEPUTY CLERK

Elaine Charlson Bredehoft for Defendant
NAME OF ATTORNEY FOR REQUESTING PARTY

23766 VA
BAR NUMBER LICENSING STATE

11260 Roger Bacon Drive, Suite 201
OFFICE ADDRESS

703-318-6800
TELEPHONE NUMBER OF ATTORNEY

Reston, VA 20190
OFFICE ADDRESS

703-318-6808
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)

VIRGINIA:

IN THE CIRCUIT COURT OF FAIRFAX COUNTY

JOHN C. DEPP, II,

Plaintiff,

v.

AMBER LAURA HEARD,

Defendant.

Civil Action No.: CL-2019-0002911

COUNSEL OF RECORD FOR ALL PARTIES

<p>Benjamin G. Chew (VSB 29113) Andrew C. Crawford (VSB 89093) BROWN RUDNICK LLP 601 Thirteenth Street, N.W. Washington, D.C. 20005 Telephone: (202) 536-1700 Facsimile: (202) 536-1701 bchew@brownrudnick.com acrawford@brownrudnick.com <i>Counsel for Plaintiff John C. Depp, II</i></p>	<p>Camille M. Vasquez (admitted <i>pro hac vice</i>) BROWN RUDNICK LLP 2211 Michelson Drive Irvine, CA 92612 Telephone: (949) 752-7100 Facsimile: (949) 252-1514 cvasquez@brownrudnick.com <i>Counsel for Plaintiff John C. Depp, II</i></p>
	<p>Adam R. Waldman THE ENDEAVOR LAW FIRM, P.C. 1775 Pennsylvania Avenue, N.W., Suite 350 Washington, DC 20006 awaldman@theendeavorgroup.com <i>Counsel for Plaintiff John C. Depp, II</i></p>
<p>Elaine Charlson Bredehoft (VSB No. 23766) 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, Virginia 20190 Telephone: (703) 318-6800 ebredehoft@cbcblaw.com anadelhaft@cbcblaw.com dmurphy@cbcblaw.com <i>Counsel for Defendant Amber Laura Heard</i></p>	<p>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, Virginia 24011 Telephone: (540) 983-7540 brottenborn@woodsrogers.com jtreece@woodsrogers.com <i>Counsel for Defendant Amber Laura Heard</i></p>

ATTACHMENT

John C. Depp, II v. Amber Laura Heard
Fairfax County Circuit Court: CL 2019-0002911

DEFINITIONS

- a. **Action.** The term "Action" means the above-captioned action.
- b. **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.
- c. **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, photographs, video or audio tape recordings, 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).
- d. **Complaint.** The term "Complaint" means the Complaint, dated March 1, 2019, filed in the Action.
- e. **Concerning.** The term "concerning" includes relating to, referring to, describing, evidencing, or constituting.
- f. **Correspondence.** The term "correspondence" means any document(s) and/or communication(s) sent to or received from another entity and/or person.
- g. **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.
- h. **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, audio or video recordings, 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.

l. **Engaged.** The term "Engaged," in relation to a person (as defined herein), means contracted, directed, hired, retained, formed an agreement with (whether formal or informal, binding or nonbinding, written or oral), and/or procured the services of, whether or not in exchange for remuneration or other valuable consideration.

j. **Including.** The term "including" means including but not limited to.

k. **Person.** The term "person" is defined as any natural person, business, company, partnership, legal entity, governmental entity, and/or association.

l. **Performance.** The term "Performance," in relation to Mr. Depp, means any creative work in which Mr. Depp or his likeness is, was, will be, may be, or is contemplated to appear, whether or not in exchange for payment or other benefit to Mr. Depp, and includes (without limitation) any appearance (or potential appearance) by Mr. Depp in any film, TV series, product endorsement, advertisement, musical performance, or in-person appearance. To avoid doubt, a Performance includes any creative work in which it was contemplated that Mr. Depp or his likeness would be featured, even if the work was ultimately created without Mr. Depp or his likeness appearing.

m. **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 both individually or as entities.

n. **Requests.** The term "Requests" shall mean the requests for documents to be produced under this Subpoena as set forth in this Attachment.

o. **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, the singular form of a word shall be interpreted as its plural to whatever extent is necessary to bring within the scope of these Topics any information which might otherwise be construed to be outside their scope.
3. Unless otherwise indicated, these Topics 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 these Topics, 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 Topics, 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 Topic 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 Topics are continuing in character so as to require You to promptly amend or supplement Your deposition within a reasonable time if You obtain or become aware of any further or contradictory information.

TOPICS FOR CORPORATE DESIGNEE UNDER THIS SUBPOENA

In response to this subpoena, you are required to produce a designee or designees to testify to the following:

1. All information relating to body cameras and footage for Officer Melissa Saenz and Officer Tyler Hadden on May 21, 2016. This includes whether they were wearing body cameras, if not, why not, if so, what happened to the footage, and any communications of any nature relating to this topic.
2. All information relating to all documents, including policies, procedures, and/or protocols respecting the use of and policies and procedure relating to LAPD body cameras, including preservation and use, in effect during the period May 21, 2016 – June 7, 2016.
3. All information relating to all documents and communications of any nature respecting any efforts to observe and/or preserve the body camera footage of Officer Melissa Saenz and Officer Tyler Hadden from their on duty May 21, 2016 activities and responses.
4. If body camera footage was destroyed, all information relating to, and all documents and communications of any nature reflecting when, where and why.
5. All information relating to documents and communications of any nature respecting any investigation of, and any disciplinary actions taken against, Officers Saenz and Hadden for any conduct up through December 31, 2016.
6. All information relating to documents and communications of any nature respecting any investigation into whether Officers Saenz and Hadden followed LAPD policy, procedures and/or protocols in responding to the call at Eastern Columbia Building on May 21, 2016 respecting Ms. Heard.
7. All information relating to documents and communications of any nature respecting any investigation into whether Officers Saenz and Hadden followed LAPD policy, procedures and/or protocols in the use of their body cameras and/or preservation of the video footage from their body cameras, in responding to the call at Eastern Columbia Building on May 21, 2016 respecting Ms. Heard.
8. All information relating to training materials from any training program taken by, or otherwise provided to, Officer Saenz and/or Officer Hadden prior to and including May 21, 2016.

9. All information relating to records reflecting training taken by Officers Saenz and Hadden on or before May 21, 2016. Please include the types of training, dates and whether in person or on line.
10. All information relating to policies, procedures and protocols in place as of May 21, 2016 with respect to all actions to be taken by officers responding to calls of potential domestic abuse or violence, or assault and battery.
11. All information relating to policies, procedures and protocols in place as of May 21, 2016 specifically impacting Officers Saenz and Hadden respecting wearing body cameras while responding to calls and if they were not, all documents and communications of any nature reflecting why they were not.
12. All information relating to documents and communications of any nature generated, sent or received by the LAPD relating to the responses to the 911 calls relating to the Eastern Columbia Building on May 21, 2016 relating to Ms. Heard. This includes all internal and external reports, communications, and other documents.
13. All information relating to documents and communications of any nature between the LAPD and any employees, with Mr. Depp, and/or any of Mr. Depp's agents, security detail, attorneys or others acting on his behalf, from May 21, 2016 through the present.

ATTORNEY OR PARTY WITHOUT ATTORNEY (Name, State Bar number, and address): Craig J. Mariam (SBN: 225280); John P. Cogger (SBN: 172808) Gordon Rees Scully Mansukhani LLP 633 West Fifth Street, 52nd Floor, Los Angeles, CA 90071 TELEPHONE NO.: 213.576.5000 FAX NO. (Optional): 877.305.0043 E-MAIL ADDRESS (Optional): cmariam@qrsm.com; icoqger@qrsm.com ATTORNEY FOR (Name): Amber Laura Heard	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, CA 90012 BRANCH NAME: Stanley Mosk Courthouse	
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 CITY, STATE, AND ZIP CODE: Fairfax, VA 22030 COUNTRY: United States	
PLAINTIFF/PETITIONER: John C. Depp, II DEFENDANT/RESPONDENT: Amber 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):

Corporate Designee - LAPD, SDT Processing Unit, 200 N. Spring St., Suite 1900, LA, CA 90012

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:	Time:	Address:
September 14, 2020	9:00am	633 West Fifth St, 52nd Floor, Los Angeles, CA 90071

- 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

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

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

4. Other terms or provisions from out-of-state subpoena, if any (specify):

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:

Craig J. Mariam

(TYPE OR PRINT NAME)

(SIGNATURE OF PERSON ISSUING SUBPOENA)
Attorney for Amber Laura Heard

(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.

Date:

(SIGNATURE)

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

Date:

(SIGNATURE)

SHORT TITLE: John C. Depp, II v. Amber Laura Heard	CASE NUMBER: CL-2019-0002911
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ATTACHMENT (Number): 3

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

COUNSEL OF RECORD

(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 _____ of _____
(Add pages as required)

VIRGINIA:

IN THE CIRCUIT COURT OF FAIRFAX COUNTY

JOHN C. DEPP, II,

Plaintiff,

v.

AMBER LAURA HEARD,

Defendant.

Civil Action No.: CL-2019-0002911

COUNSEL OF RECORD FOR ALL PARTIES

<p>Benjamin G. Chew (VSB 29113) Andrew C. Crawford (VSB 89093) BROWN RUDNICK LLP 601 Thirteenth Street, N.W. Washington, D.C. 20005 Telephone: (202) 536-1700 Facsimile: (202) 536-1701 bchew@brownrudnick.com acrawford@brownrudnick.com <i>Counsel for Plaintiff John C. Depp, II</i></p>	<p>Camille M. Vasquez (admitted <i>pro hac vice</i>) BROWN RUDNICK LLP 2211 Michelson Drive Irvine, CA 92612 Telephone: (949) 752-7100 Facsimile: (949) 252-1514 cvasquez@brownrudnick.com <i>Counsel for Plaintiff John C. Depp, II</i></p>
	<p>Adam R. Waldman THE ENDEAVOR LAW FIRM, P.C. 1775 Pennsylvania Avenue, N.W., Suite 350 Washington, DC 20006 awaldman@theendeavorgroup.com <i>Counsel for Plaintiff John C. Depp, II</i></p>
<p>Elaine Charlson Bredehoft (VSB No. 23766) 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, Virginia 20190 Telephone: (703) 318-6800 ebredehoft@cbcblaw.com anadelhaft@cbcblaw.com dmurphy@cbcblaw.com <i>Counsel for Defendant Amber Laura Heard</i></p>	<p>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, Virginia 24011 Telephone: (540) 983-7540 brottenborn@woodsrogers.com jtreece@woodsrogers.com <i>Counsel for Defendant Amber Laura Heard</i></p>

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.)

CERTIFICATE OF COUNSEL

(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 _____ of _____
(Add pages as required)

VIRGINIA:

IN THE CIRCUIT COURT OF FAIRFAX COUNTY

JOHN C. DEPP, II,

Plaintiff,

v.

AMBER LAURA HEARD,

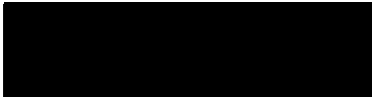
Defendant.

Civil Action No.: CL-2019-0002911

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 to be sent by email this 17th day of August, 2020.

August 17, 2020


Elaine Charlson Bredehoff (VSB No. 23766)
Adam S. Nadelhaft (VSB No. 91717)
David E. Murphy (VSB No. 90938)
Charlson Bredehoff Cohen & Brown, P.C.
11260 Roger Bacon Drive, Suite 201
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Telephone: (703) 318-6800
ebredehoff@cbcblaw.com
anadelhaft@cbcblaw.com
dmurphy@cbcblaw.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, Virginia 24011
Telephone: (540) 983-7540
brottenborn@woodsrogers.com
jtreece@woodsrogers.com

Counsel to Defendant Amber Laura Heard

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing was served this 17th day of August 2020, by email, by agreement of the parties, addressed as follows:

Benjamin G. Chew, 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
acrawford@brownrudnick.com

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Adam R. Waldman, Esq.
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1775 Pennsylvania Avenue, N.W., Suite 350
Washington, DC 20006
awaldman@theendeavorgroup.com

Counsel for Plaintiff John C. Depp, II


Elaine Charlson Bredehoff (VSB No. 23766)

CHARLSON BREDEHOFT COHEN & BROWN, P.C.

ATTORNEYS AND COUNSELORS AT LAW

CURTIS L. CHARLSON (1925-2010)
ELAINE CHARLSON BREDEHOFT
PETER C. COHEN
CARLA D. BROWN
ADAM S. NADELHAFT

HANS H. CHEN
KATHLEEN Z. QUILL
DAPHNE S. GEBAUER
YVONNE A. MILLER
DAVID E. MURPHY

ALSO ADMITTED IN D.C.
◊ ALSO ADMITTED IN MARYLAND
♦ ALSO ADMITTED IN MASSACHUSETTS
% ALSO ADMITTED IN NEW YORK
○ ALSO ADMITTED IN WISCONSIN
• ONLY ADMITTED IN MARYLAND

August 17, 2020

BY MESSENGER

John T. Frey, Clerk
Fairfax County Circuit Court
4110 Chain Bridge Road, 3rd Floor
Fairfax, VA 22030

FILED
CIVIL INTAKE
2020 AUG 17 PM 2:58
JOHN T. FREY
CLERK, CIRCUIT COURT
FAIRFAX, VA

Re: *Case No. CL-2019-0002911 – John C. Depp, II v. Amber Laura Heard*

Dear Mr. Frey:

Enclosed for filing in the above referenced matter, please find four 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 Subpoenas for Production of Business Records in Action Pending Outside California, Subpoenas Duces Tecum to Person Under Foreign Subpoena, and Deposition Subpoena for Personal Appearance in Action Pending Outside California 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 file stamped copies of the same via the awaiting messenger.

Thank you very much for your assistance.

Very truly yours,


Elaine Charlson Bredehoff

Enclosures