[] 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.

	RESS: 601	Bett Clo Ben Chew Esq Brown Rudnick Thirteenth Street NW STE 600 Dh DC 20005		
[]	PERSONAL SEF	l Tal		
Bein	g unable to mak	e 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:			
[]		It door or such other door as appears to be the main entrance of usual place of abode, address Other authorized recipient not found.)		
[]	not found	, Sheriff		
,	DATE	by, Deputy Sheriff		

SUBPOENA/SUBPOE		File No	
1	FOREIGN SUBPOENA		
	VA CODE §§ 8.01-412.8—8.01-412.15;	Rule 4:9	
Fairfax County			att. a
		***************************************	Circuit Court
4110 Chain Bridge Road, F			
	ADDRESS OF	FCOURT	بي
John C. Depp, II	v./In 1	e: Amber Laura Heard	8
O THE PERSON AUTI	IORIZED BY LAW TO SERV	E THIS PROCESS:	
ou are commanded to sur	nmon Sean Bett c/o Ben	Chew. Esq.	1 28°C
	Brown Ruc	•	夏克艺 *
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paar (1 (Street, NW, Ste. 600	<u>\</u> \ \ \ \ \ \ \ \ \ \ \ \ \ \ \ \ \ \
Markington D	STREET AL	DDRESS	20005
Washington, D.	C. STATE	, , , , , , , , , , , , , , , , , , ,	ZIP
	· · · · · ·		
O THE PERSON SUM	MONED: You are commanded	to	
attend and give testime	ny at a denosition		
attend and give testime	my at a deposition		
I meadured the books doe	uments records electronically si	tored information, and fanor	ble things designated and
	amonts, rocords, orconomount s	tored information, and tangi	0 0
described below		orea intermation, and tange	
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described below		oreo mormanon, and tangi	
described below			
described below See A	Attachment	oreo information, and tange	
described below See A	Attachment		2020 of 10:00 o m
described below See A	Attachment		2020 of 10:00 o m
described below See A First Legal Records F at 1511 West Beverly B	Attachment Retrieval Ivd., Los Angeles, CA 90026	February 24,	2020 at 10:00 a.m.
First Legal Records F at 1511 West Beverly B and to permit inspection	Retrieval lvd., Los Angeles, CA 90026	February 24, at	2020 at 10:00 a.m.
First Legal Records F at 1511 West Beverly B and to permit inspectio designated items in you	Retrieval location and copying by the requesting ur possession, custody or control	February 24, at	2020 at 10:00 a.m.
First Legal Records F at 1511 West Beverly B and to permit inspection	Retrieval location and copying by the requesting ur possession, custody or control	February 24, at	2020 at 10:00 a.m.
First Legal Records F at 1511 West Beverly B and to permit inspection designated items in your permit inspection of the	Retrieval location and copying by the requesting ur possession, custody or control	February 24, at	2020 at 10:00 a.m.
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First Legal Records F at 1511 West Beverly B and to permit inspection designated items in your permit inspection of the tithe following location	Retrieval lyd., Los Angeles, CA 90026 LOCATION In and copying by the requesting or possession, custody or control e premises	February 24, at	2020 at 10:00 a.m.
First Legal Records F at 1511 West Beverly B and to permit inspection designated items in your permit inspection of that the following location	Retrieval location and copying by the requesting ur possession, custody or control e premises	February 24, at	2020 at 10:00 a.m.
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First Legal Records F at 1511 West Beverly B and to permit inspection designated items in your permit inspection of the tithe following location	Retrieval location and copying by the requesting ur possession, custody or control e premises	party or someone acting in h	2020 at 10:00 a.m.
First Legal Records F at 1511 West Beverly B and to permit inspection designated items in your permit inspection of the the following location	Retrieval Ivd., Los Angeles, CA 90026 LOCATION In and copying by the requesting our possession, custody or control e premises LOCAT TIME on the request of the party named Amber Laur	party or someone acting in h	2020 at 10:00 a.m.
First Legal Records F at 1511 West Beverly B and to permit inspection designated items in your permit inspection of the the following location DATE AND This subpoena is issued up	Retrieval Ivd., Los Angeles, CA 90026 LOCATION In and copying by the requesting our possession, custody or control e premises LOCAT TIME On the request of the party named Amber Laur	February 24, at party or someone acting in h	2020 at 10:00 a.m.
First Legal Records F at 1511 West Beverly B and to permit inspection designated items in your permit inspection of the the following location DATE AND C/O Ben Rottenbo	Retrieval Ivd., Los Angeles, CA 90026 LOCATION In and copying by the requesting our possession, custody or control e premises LOCAT TIME on the request of the party named Amber Laur	February 24, at	2020 at 10:00 a.m.
First Legal Records F at 1511 West Beverly B and to permit inspection designated items in your permit inspection of the the following location DATE AND C/O Ben Rottenbo	Retrieval lyd., Los Angeles, CA 90026 LOCATION In and copying by the requesting our possession, custody or control e premises LOCATION TIME on the request of the party name of Amber Laur NAME OF REQUE TIME, Esq., Woods Rogers, PLC, 10 S	February 24, at	2020 at 10:00 a.m.

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 x on attached list.

February 5, 2020	ИНОЕ	t. Frey, Clerk
DATE ISSUED		
•	by	
		DEPUTY CLERK
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	***************************************	HONE NUMBER OF ATTORNEY
Suite 1400, Roanoke, Virginia 24011	(540) 983-7711	
OFFICE ADDRESS	******************************	MILE NUMBER OF ATTORNEY
NAME	BAR NUMBER	LICENSING STATE
STREET ADDRESS		TELEPHONE NUMBER
STREET ADDRESS	***************************************	FACSIMILE NUMBE
NAME	BAR NUMBER	LICENSING STATE
STREET ADDRESS	***************************************	TELEPHONE NUMBER
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-		
NAME	BAR NUMBER	LICENSING STATE
STREET ADDRESS		TELEPHONE NUMBER
STREET ADDRESS		PACSIMILE NUMBER

RETURN OF SERVICE (see page three of this form)



BEN ROTTENBORN (540) 983-7540 brottenborn@woodsrogers.com

February 3, 2020

VIA OVERNIGHT UPS DELIVERY

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

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

Fairfax County Circuit Court Case No. CL2019-0002911

Subpoena for Documents: Sean Bett

Dear Mr. Frey,

Re:

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 Subpoena Duces Tecum 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

Sprain

Ben Romenoom

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

VIRGINIA:



IN THE CIRCUIT COURT OF FAIRFAX COUNTY EB -4 AM !!: 4 |

JOHN C. DEPP, II

Plaintiff,

JOHN T. FREY CLERK-CIRCUIT COLIRT SAIRFAX, VA

v.

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 email, per the parties' agreement regarding service by electronic mail, on the 3rd day of February, 2020, 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
itreece@woodsrogers.com

Attorneys for Defendant Amber Laura Heard

{2655445-1, 121024-00001-01}

I certify that on this 3rd day of February, 2020, a copy of the foregoing shall be served by email, per the parties' agreement regarding service by electronic mail, 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
Telephone: (202) 536-1700
Facsimile: (202) 536-1701
bchew@brownrudnick.com
eweingarten@brownrudnick.com
acrawford@brownrudnick.com

Camille M. Vasquez, Esq. BROWN RUDNICK LLP 2211 Michelson Drive Irvine, CA 92612

Telephone: (949) 752-7100 Facsimile: (949) 252-1514 cvasquez@brownrudnick.com Adam R. Waldman, Esq.
THE ENDEAVOR LAW FIRM, P.C.
1775 Pennsylvania Avenue, N.W., Suite 350
Washington, DC 20006
awaldman@theendeavorgroup.com

Robert Gilmore, Esq.
Kevin Attridge, Esq.
STEIN MITCHELL BEATO & MISSNER LLP
901 Fifteenth Street, N.W.
Suite 700
Washington, D.C. 20005
Telephone: (202) 601-1589
Facsimile: (202) 296-8312
rgilmore@steinmitchell.com
kattridge@steinmitchell.com

Counsel for Plaintiff John C. Depp, II

2 Commission

V3889602

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
brottenborn@woodsrogers.com
itreece@woodsrogers.com

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, 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, 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.
 - i. *Including.* The term "including" means including but not limited to.
- j. *Person*. The term "person" is defined as any natural person, business, company, partnership, legal entity, governmental entity, and/or association.
- k. *Plaintiff and/or Mr. Depp*. The terms "Plaintiff" and/or "Mr. Depp" refer to Plaintiff John C. Depp, II, including his agents, representatives, employees, assistants, bodyguards, assigns, and all persons acting on his behalf.
- 1. Relevant Dates. A Relevant Date is any of the following dates (inclusive of the first and last day of any range):
 - i. December 31, 2012

- ii. March 8, 2013
- iii. May 24, 2014
- iv. August 17, 2014
- v. December 17, 2014;
- vi. January 25, 2015
- vii. March 3-6, 2015
- viii. March 22, 2015
- ix. July 25-28, 2015
- x. November 26, 2015
- xi. December 15, 2015
- xii. April 21, 2016
- xiii. May 21, 2016.
- m. Requests. The term "Requests" shall mean the requests for documents to be produced under this Subpoena as set forth in this Attachment
- n. Romantic Partners. The term "Romantic Partners" shall mean any persons You know to have been in a romantic or sexually intimate relationship with Mr. Depp.
- 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 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.
- 9. Unless otherwise specified, these document requests cover the period from January 1, 2010, through the present, up to and through trial in this Action.

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 documents or communications with Mr. Depp that refer or relate to Ms. Heard.
- 2. All documents or communications with Ms. Heard that refer or relate to Mr. Depp.
- 3. All documents or communications concerning the relationship between Mr. Depp and Ms. Heard, including, but not necessarily limited to any violence or abuse between Mr. Depp and Ms. Heard.
- 4. All documents or communications concerning any actual, alleged, or attempted act of violence involving Mr. Depp.
- 5. All documents or communications concerning any actual, alleged, or attempted alcohol or drug use or abuse by Mr. Depp from 2013 to present.
- 6. All documents or communications concerning any actual or alleged act of Mr.

 Depp that resulted in damage to property exceeding \$1,500 in damage within one month of any

 Relevant Date.
- 7. All documents or communications concerning any alleged injury or property damage involving Mr. Depp on or around April 21, 2016.
- 8. All documents or communications concerning any transactions, payments, gifts, or transfers of value of any kind, whether in monetary form or otherwise, relating to any act of violence, alleged act of violence, or attempted act of violence involving Mr. Depp.

9. Documents sufficient to show transactions, payments, gifts, or transfers of value of any kind, whether in monetary form or otherwise, relating to the damage or destruction of property by Mr. Depp within one week of any Relevant Date.

* * *

Certification of Business Records

Name of Business:
Date:
Records Recipient:
Regarding the records of:
[Employee Name]
[Employee Date of Birth]
I
Sign:
Print:
Title

All Counsel of Record

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

Camille M. Vasquez

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Washington, DC 20005

Tel. (202) 601-1602, or 1589

Fax (202) 296-8312

rgilmore@steinmitchell.com

Joshua R. Treece, Esq.

J. Benjamin Rottenborn, Esq.

WOODS ROGERS PLC

10 S. Jefferson Street, Suite 1400

Roanoke, VA 24011

T: 540.983.7730

F: 540.322.3885

itreece@woodsrogers.com

brottenbom@woodsrogers.com

Counsel for John C. Depp, II

Counsel for Amber Laura Heard

Timothy J. McEvoy, Esq. (VSB No. 33277)
Sean Patrick Roche, Esq. (VSB No. 71412)
CAMERON/McEVOY, PLLC
4100 Monument Corner Drive,
Suite 420 Fairfax, Virginia 22030
703.460.9343 (Direct)
703.273.8898 (Office)
703.273.8897 (Fax)
tmcevoy@cameronmcevoy.com
sroche@cameronmcevoy.com

Counsel for Amber Laura Heard

Davida Brook, Esq. (SBN 275370) SUSMAN GODFREY L.L.P. 1900 Avenue of the Stars, Suite 1400 Los Angeles, CA 90067 Tel. (310) 789-3105 dbrook@susmangodfrey.com Counsel for Amber Laura Heard

Roberta A. Kaplan, Esq.
John C. Quinn, Esq.
Julie E. Fink, Esq.
KAPLAN HECKER & FINK LLP
350 Fifth Avenue, Suite 7110 New
York, New York 10118 T:
212.763.0883
rkaplan@kaplanhecker.com
jink@kaplanhecker.com

Counsel for Amber Laura Heard

SUBP-035

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.: 31U-789-31UU FAX NO.: E-MAIL ADDRESS: dbrook@susmanqodfrev.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	FOR COURT USE ONLY
	4
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	
PLAINTIFF/PETITIONER: JOHN C. DEPP, II	CALIFORNIA CASE NUMBER (if any assigned by court):
DEFENDANT/RESPONDENT: AMBER LAURA HEARD	
SUBBOENA FOR BRODUCTION OF BUSINESS PROSPES	CASE NUMBER (of action pending outside California):
SUBPOENA FOR PRODUCTION OF BUSINESS RECORDS IN ACTION PENDING OUTSIDE CALIFORNIA	CL-2019-0002911

THE PEOPLE OF THE STATE OF CALIFORNIA, TO (name, address, and telephone number of deponent, if known):
Sean Bett c/o Ben Chew, Brown Rudnick, 601 Thirteenth St., NW Suite 600, Washington, DC

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): 2/24/2020 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. Dy 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 copyling 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).

THE PROPERTY OF THE PROPERTY O	CASE NUMBER (of action pending outside California):	
PLAINTIFF/PETITIONER: JOHN C. DEPP, II		
DEFENDANT/RESPONDENT: AMBER LAURA HEARD		
5. If you have been served with this subpoena as a custodian o Procedure section 1985.6 and a motion to quash or an object the parties, witnesses, and consumer or employee affected n consumer or employee records.	tion has been served on you, a court order or agreement of	
6. Other terms or provisions from out-of-state subpoena, if an	y (specify):	
See Attachment 6		
✓ Continued on Attachment 6 (use form MC-025).		
DISOBEDIENCE OF THIS SUBPOENA MAY BE PUNISHED AS FOR THE SUM OF \$500 AND ALL DAMAGES R		
Date issued: 02/03/2020		
Davida Brook	(SIGNATURE OF PERSON ISSUING SUBPOENA)	
(TYPE OR PRINT NAME)	(SIGNATURE OF PERSON ISSUING SUBPOENA)	
·	Attorney for Defendant Amber Laura Heard	
PROOF OF SERVICE	·	
PRODUCTION OF BU		
 I served this Subpoena for Production of Business Records In Act to the person served as follows: a. Person served (name): b. Address where served: 	ction Pending Outside California by personally delivering a copy	
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 employe amount tendered was (specify): \$		
f. Fee for service: \$		
2. I received this subpoena for service on (date):		
 I also served a completed Proof of Service of Notice to Co by personally delivering a copy to the person served as de Person serving: 	nsumer or Employee and Objection (form SUBP-025) escribed in 1 above.	
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)		
h. Name, address, telephone number, and, if applicable, county		
I declare under penalty of perjury under the laws of the State of	(For California shariff or marchal use anim)	
California that the foregoing is true and correct.	(For California sheriff or marshal use only) I certify that the foregoing is true and correct.	
Date:	Date:	
•	•	
(SIGNATURE)	(SIGNATURE)	

		MC-02
SHORT TITLE:	CASE NUMBER:	
Depp v. Heard	CL-2019-0002911	l
ATTACHMEN	T (Number): 3	
(This Attachment may be used w		
See attached.		
		•
	·	
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;		
(If the item that this Attachment concerns is made under penalty of perju	ury, all statements in this Page	of
Attachment are made under penalty of perjury.)	(Add pages as	

ATTACHMENT NO. 3

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, 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, 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.
 - i. Including. The term "including" means including but not limited to.
- j. *Person.* The term "person" is defined as any natural person, business, company, partnership, legal entity, governmental entity, and/or association.
- k. *Plaintiff and/or Mr. Depp*. The terms "Plaintiff" and/or "Mr. Depp" refer to Plaintiff John C. Depp, II, including his agents, representatives, employees, assistants, bodyguards, assigns, and all persons acting on his behalf.
- 1. Relevant Dates. A Relevant Date is any of the following dates (inclusive of the first and last day of any range):
 - i. December 31, 2012

- ii. March 8, 2013
- iii. May 24, 2014
- iv. August 17, 2014
- v. | December 17, 2014;
- vi. | January 25, 2015
- vii. March 3-6, 2015
- viii. March 22, 2015
- ix. July 25-28, 2015
- x. November 26, 2015
- xi. December 15, 2015
- xii. April 21, 2016
- xiii. May 21, 2016.
- m. Requests. The term "Requests" shall mean the requests for documents to be produced under this Subpoena as set forth in this Attachment
- n. Romantic Partners. The term "Romantic Partners" shall mean any persons You know to have been in a romantic or sexually intimate relationship with Mr. Depp.
- 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 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.
- 9. Unless otherwise specified, these document requests cover the period from January 1, 2010, through the present, up to and through trial in this Action.

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 documents or communications with Mr. Depp that refer or relate to Ms. Heard.
- 2. All documents or communications with Ms. Heard that refer or relate to Mr. Depp.
- 3. All documents or communications concerning the relationship between Mr. Depp and Ms. Heard, including, but not necessarily limited to any violence or abuse between Mr. Depp and Ms. Heard.
- 4. All documents or communications concerning any actual, alleged, or attempted act of violence involving Mr. Depp.
- 5. All documents or communications concerning any actual, alleged, or attempted alcohol or drug use or abuse by Mr. Depp from 2013 to present.
- 6. All documents or communications concerning any actual or alleged act of Mr.

 Depp that resulted in damage to property exceeding \$1,500 in damage within one month of any

 Relevant Date.
- 7. All documents or communications concerning any alleged injury or property damage involving Mr. Depp on or around April 21, 2016.
- 8. All documents or communications concerning any transactions, payments, gifts, or transfers of value of any kind, whether in monetary form or otherwise, relating to any act of violence, alleged act of violence, or attempted act of violence involving Mr. Depp.

9. Documents sufficient to show transactions, payments, gifts, or transfers of value of any kind, whether in monetary form or otherwise, relating to the damage or destruction of property by Mr. Depp within one week of any Relevant Date.

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SHORT TITLE:

Depp v. Heard

CASE NUMBER:

CL-2019-0002911

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 2

(Add pages as required)

SHORT TITLE:

Depp v. Heard

CL-2019-0002911

ATTACHMENT (Number): 4 Cont.

(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 2 of 2

(Add pages as required)

Form Approved for Optional Use Judicial Council of California MC-025 [Rev. July 1, 2009]

ATTACHMENT to Judicial Council Form

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			MC-02
SHORT TITLE:		CASE NUMBER:	
Depp v. Heard		CL-26	019-0002911
	ATTACHMENT (Number): 6		
	(This Attachment may be used with any Judicial Cou	ıncil form.)	
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Form Approved for Optional Use Judicial Council of California MC-025 [Rev. July 1, 2009]

Attachment are made under penalty of perjury.)

ATTACHMENT to Judicial Council Form

(Add pages as required)
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