

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>Sepehr Daghighian, Haddler Daghighian Martino &amp; Novak</u>	
ADDRESS: <u>10250 Constellation Blvd Ste 2500</u> <u>Los Angeles, California 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**

FILED  
CIVIL INTAK.

2019 OCT 18 AM 8:30

JOHN T. FREY  
CLERK, CIRCUIT COURT  
FAIRFAX, VA

**SUBPOENA/SUBPOENA DUCES TECUM  
TO PERSON UNDER FOREIGN SUBPOENA**

File No. CL2019-0002911

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

Sepehr Daghighian, Hackler Daghighian Martino & Novak

NAME

10250 Constellation Blvd., Ste. 2500

STREET ADDRESS

Los Angeles California 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 Exh. A

at First Legal Records Retrieval (1511 West Beverly Boulevard) at November 18, 2019 at 10:00 a.m.  
LOCATION Los Angeles, California 90026 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

Amber Laura Heard

NAME OF REQUESTING PARTY

c/o Ben Rottenborn, Woods Rogers, PLC, 10 S. Jefferson Street, Suite 1400

STREET ADDRESS

Roanoke Virginia 24011 (540) 983-7540

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.

October 28, 2019

DATE ISSUED

**JOHN T. FREY, CLERK**

by



J. Benjamin Rottenborn

NAME OF ATTORNEY FOR REQUESTING PARTY

Woods Rogers PLC, 10 S. Jefferson St.

OFFICE ADDRESS

Suite 1400, Roanoke, Virginia 24011

OFFICE ADDRESS

84796

Virginia

BAR NUMBER

LICENSING STATE

(540) 983-7540

TELEPHONE NUMBER OF ATTORNEY

(540) 983-7711

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)

**Exhibit A**

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

**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. Any and all Deposition Transcripts in your possession, custody, or control, from depositions taken in the matter of *Jane Doe v. John Christopher Depp, II, et al.*, LASC Case Number BC482823.
2. Any and all Settlement Agreements in your possession, custody, or control, and in the matter of *Jane Doe v. John Christopher Depp, II, et al.*, LASC Case Number BC482823.

ATTORNEY OR PARTY WITHOUT ATTORNEY (Name, State Bar number, and address): Richard A. Schwartz (SBN 267469)/ Milin Chun (SBN 262674) Browne George Ross LLP 2121 Avenue of the Stars Los Angeles, CA 90067 TELEPHONE NO.: 310.274.7100 FAX NO.: 310.275.5697 E-MAIL ADDRESS: rschwartz@bgrfirm.com ATTORNEY FOR (Name): Defendant AMBER LAURA HEARD	FOR COURT USE ONLY
Court for county in which discovery is to be conducted: SUPERIOR COURT OF CALIFORNIA, COUNTY OF  STREET ADDRESS: MAILING ADDRESS: CITY, STATE, AND ZIP CODE: BRANCH NAME:	
Court in which action is pending: Name of Court: In The Circuit State Court of Fairfax County, Virginia STREET ADDRESS: 4110 Chain Bridge Road MAILING ADDRESS: CITY, STATE, AND ZIP CODE: Fairfax, VA 22030-4009 COUNTRY: U.S.A.	
PLAINTIFF/PETITIONER: JOHN C. DEPP, II  DEFENDANT/RESPONDENT: AMBER LAURA HEARD	CALIFORNIA CASE NUMBER (if any assigned by court):
<b>SUBPOENA FOR PRODUCTION OF BUSINESS RECORDS          IN ACTION PENDING OUTSIDE CALIFORNIA</b>	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):  
 Sepehr Daghighian, Hackler Daghighian Martino & Novak, 10250 Constellation Blvd., Ste. 2500, Los Angeles, California 90067

**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): November 17, 2019 At (time): 10:00 a.m. Location (address): 1511 West Beverly Boulevard, Los Angeles, California 90026
<b>Do not release the requested records to the deposition officer prior to the date and time stated above.</b>

- 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).

PLAINTIFF/PETITIONER: JOHN C. DEPP, II	CASE NUMBER (of action pending outside California): CL-2019-0002911
DEFENDANT/RESPONDENT: AMBER LAURA HEARD	

5. If you have been served with this subpoena as a custodian of consumer or employee records under Code of Civil Procedure section 1985.6 and a motion to quash or an objection has been served on you, a court order or agreement of the parties, witnesses, and consumer or employee affected must be obtained before you are required to produce consumer or employee records.

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

Continued on Attachment 6 (use form MC-025).

**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: October \_\_\_\_, 2019

Richard A. Schwartz

(TYPE OR PRINT NAME)



(SIGNATURE OF PERSON ISSUING SUBPOENA)

Attorneys for Defendant AMBER LAURA HEARD

(TITLE)

**PROOF OF SERVICE OF SUBPOENA FOR PRODUCTION OF BUSINESS RECORDS**

1. I served this Subpoena for Production of Business Records In Action Pending Outside California by personally delivering a copy to the person served as follows:

- a. Person served (name):
- 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.  I also served a completed Proof of Service of Notice to Consumer or Employee and Objection (form SUBP-025) by personally delivering a copy to the person served as described in 1 above.

4. 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.  Registered professional photocopier
- g.  Exempt from registration under Business and Professions Code section 22451
- h. 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)

**ATTACHMENT 3**

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

**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. Any and all Deposition Transcripts in your possession, custody, or control, from depositions taken in the matter of *Jane Doe v. John Christopher Depp, II, et al.*, LASC Case Number BC482823.
2. Any and all Settlement Agreements in your possession, custody, or control, and in the matter of *Jane Doe v. John Christopher Depp, II, et al.*, LASC Case Number BC482823.

**ATTACHMENT NO. 4**

Benjamin G. Chew, Esq. (VSB 29113)  
Elliot J. Weingarten (pro hac vice pending)  
Andrew C. Crawford (VSB No. 89093)  
BROWN RUDNICK LLP  
601 Thirteenth Street, NW  
Washington, DC 20005  
(202) 536-1700  
(202) 536-1701 – FAX  
bchew@brownrudnick.com

*Counsel for John C. Depp, II*

Camille M. Vasquez (pro hac vice pending)  
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Tel. (949) 752-7100  
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cvasquez@brownrudnick.com

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*Counsel for John C. Depp, II*

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Kevin L. Attridge, Esq.  
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Tel. (202) 601-1602, or 1589  
Fax (202) 296-8312  
rgilmore@steinmitchell.com

*Counsel for John C. Depp, II*

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J. Benjamin Rottenborn, Esq.  
WOODS ROGERS PLC  
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Roanoke, VA 24011  
T: 540.983.7730  
F: 540.322.3885  
jtreece@woodsrogers.com  
brottenborn@woodsrogers.com

*Counsel for Amber Laura Heard*



**ATTACHMENT NO. 4 (cont'd)**

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

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Julie E. Fink, Esq.  
John C. Quinn, Esq.  
Joshua Matz, Esq.  
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jqinn@kaplanhecker.com  
jmatz@kaplanhecker.com

*Counsel for Amber Laura Heard*

SHORT TITLE: JOHN C. DEPP, II v. AMBER LAURA HEARD	CASE NUMBER: CL-2019-0002911
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ATTACHMENT (Number): 6

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

See attached Fairfax County Circuit Court Subpoena

*(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)*

FILED  
CIVIL INTAKE

2019 OCT 18 AM 8:33

VIRGINIA:

IN THE CIRCUIT COURT OF FAIRFAX COUNTY  
CLERK, CIRCUIT COURT  
FAIRFAX, VA

JOHN C. DEPP, II

Plaintiff,

v.

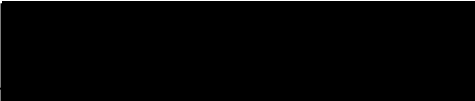
Civil Action No.: CL-2019-0002911

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 United States Mail on the 18th day of October, 2019, to counsel of record.

  
/ 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](mailto:brottenborn@woodsrogers.com)  
[jtreece@woodsrogers.com](mailto:jtreece@woodsrogers.com)

*Attorneys for Defendant Amber Laura Heard*

SERVICE LIST

<p>Robert Gilmore (<i>pro hac vice pending</i>) Kevin Attridge (<i>pro hac vice pending</i>) Brittany Whitesell Biles (<i>pro hac vice</i>) <b>STEIN MITCHELL BEATO &amp; MISSNER LLP</b> 901 Fifteenth Street, NW, Suite 700 Washington, DC 20005 (202) 601-1602 (202) 296-8312 - FAX <a href="mailto:rgilmore@steinmitchell.com">rgilmore@steinmitchell.com</a>; <a href="mailto:kattridge@steinmitchell.com">kattridge@steinmitchell.com</a> <a href="mailto:bbiles@steinmitchell.com">bbiles@steinmitchell.com</a></p> <p>Adam R. Waldman, Esq. (<i>pro hac vice pending</i>) <b>THE ENDEAVOR LAW FIRM, P.C.</b> 1775 Pennsylvania Avenue, NW Suite 350 Washington, DC 20006</p> <p>Benjamin G. Chew, Esq. (VSB 29113) Elliot J. Weingarten (<i>pro hac vice</i>) Andrew C. Crawford (VSB No. 89093) <b>BROWN RUDNICK LLP</b> 601 Thirteenth Street, NW Washington, DC 20005 (202) 536-1700 (202) 536-1701 – FAX <a href="mailto:bchew@brownrudnick.com">bchew@brownrudnick.com</a></p>	<p><i>Attorneys for Plaintiff, John C. Depp, II</i></p>
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BEN ROTTENBORN  
(540) 983-7540  
brottenborn@woodsrogers.com

2019 OCT 18 AM 8:33

JOHN T. FREY  
CLERK, CIRCUIT COURT  
October 18, 2019

**VIA U.S. MAIL**

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

**Re: John C. Depp, II v. Amber Laura Heard; Fairfax County Circuit Court Case  
No. CL2019-0002911**

Dear Mr. Frey,

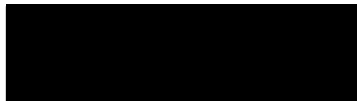
In the above-referenced matter, enclosed for filing please find two copies of Defendant's Certificate of Counsel and corresponding subpoena issued pursuant to Virginia Code Section 8.01-412.10 and California Civil Procedure Code Section 2029.100 (collectively, "Acts"). The enclosed Subpoena for Production 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 return envelope.

Thank you for your assistance and please do not hesitate to call with any questions or concerns.

Very truly yours,

WOODS ROGERS PLC



Ben Rottenborn

JBR:kpm

Fairfax Circuit Court  
Circuit Court  
Receipt No. 862953  
Receipt Date: 10/28/2019 11:41 AM

Received of: Treece,Joshua \$ 7.00

Seven and 00/100

John C Depp II vs. Amber Laura Heard

Filer(s): Heard, Amber Laura

<u>Case</u>	<u>Amount</u>
CL-2019-0002911	
Copy - Certified	2.00
Subpoena Duces Tecum Clerks Fee	5.00
<hr/>	
	Total: 7.00
	Balance due court: \$ 0.00
	Next fine/fee due date:
	Next restitution due date:

Check (Num: 63425, Exp: xx/xx)

Amount Tendered: 7.00

Overage: 0.00

Change Due: 0.00

John T. Frey, Clerk of Circuit Court

By: \_\_\_\_\_  
Deputy Clerk  
Clerk: TWOODE