VIRGINIA:

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IN THE CIRCUIT COURT OF FAIRFAX COUNTY

JOHN C. DEPP, II,

Plaintiff and Counterclaim Defendant,

Civil Action No.: CL-2019-0002911

AMBER LAURA HEARD,

Defendant and Counterclaim Plaintiff.

CONSENT ORDER

WHEREFORE, Defendant and Counterclaim Plaintiff Amber Laura Heard ("Ms. Heard") and Plaintiff and Counterclaim Defendant John C. Depp, II ("Ms. Depp"), by counsel, having engaged in meet and confers respecting Ms. Heard's Motion to Compel Sixth, Seventh, Eighth, Ninth, and Tenth Requests for Admissions, Ms. Heard's Third, Fourth, and Fifth Interrogatories, and Ms. Heard's Nineteenth and Twentieth Requests for Production of Documents ("Ms. Heard's Motion"), and Mr. Depp having consented to an Order respecting certain of these discovery requests, as evidenced by the parties' signatures below, it is hereby:

ORDERED that as to Ms. Heard's 3rd Interrogatories, Interrogatories 2-4, Ms. Heard's Motion is most because Mr. Depp is providing substantive responses on March 11, 2022, subject to and without waiving his objections; and it is further

ORDERED that as to Ms. Heard's 19th Requests for Production, Mr. Depp shall produce any non-privileged responsive documents within his possession, custody, and control that support his responses to Ms. Heard's Third Interrogatories; and it is further

¹ This Consent Order is without prejudice to the remaining discovery sought in Ms. Heard's Motion that is not addressed by this Consent Order, which is noticed to be heard by the Court on March 11, 2022.

ORDERED that as to Ms. Heard's 20th Requests for Production, Mr. Depp shall produce any non-privileged responsive documents to those Requests within his possession, custody, and control responsive to the following Requests or Revised Requests;

Revised Request 1: Any non-privileged documents that reflect or refer to Mr. Depp's resignation from Fantastic Beasts, to the extent not previously produced.

Revised Request 3: Please produce any non-privileged documents supporting Your Responses to Ms. Heard's 4th Set of Interrogatories, to the extent not previously produced.

Request 5: If You deny any of the Requests in Ms. Heard's 6th Set of Requests for Admissions, please produce any non-privileged documents, if any, supporting such denial, to the extent not previously produced;

Request 6: If You deny any of the Requests in Ms. Heard's 7th Set of Requests for Admissions, please produce any non-privileged documents, if any, supporting such denial, to the extent not previously produced;

Request 7: If You deny any of the Requests in Ms. Heard's 8th Set of Requests for Admissions, please produce any non-privileged documents, if any, supporting such denial, to the extent not previously produced;

Request 8: If You deny any of the Requests in Ms. Heard's 9th Set of Requests for Admissions, please produce any non-privileged documents, if any, supporting such denial, to the extent not previously produced; and it is further

ORDERED that unless otherwise stated in this Order, Mr. Depp shall comply with the above Orders by March 22, 2022, and Ms. Heard may supplement her trial exhibits based on any additional information or documents produced by Mr. Depp responsive to this Order.

SO ORDERED.

March 1 , 2022

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Chief Judge, Fairfax County Circuit Court

Compliance with Rule 1:13 requiring the endorsement of counsel of record is modified by the Court, in its discretion, to permit the submission of the following electronic signatures of counsel in lieu of an original endorsement or dispensing with endorsement.

WE ASK FOR THIS:

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