

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: Person Most Qualified at Children's Hospital -	
ADDRESS: c/o Cogency Global, Inc. Los Angeles 1325 J Street, Suite 1550	
<input type="checkbox"/> PERSONAL SERVICE	Tel. No. Sacramento, CA 95814
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. CL-2019-0002911

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

Person Most Qualified at Children's Hospital Los Angeles

NAME

c/o Cogency Global Inc., 1325 J Street, Suite 1550

STREET ADDRESS

Sacramento

CA

CITY

STATE

FILED
CIVIL INTAKE
FEB 12 PM 12:13
JOHN T. FREEMANT
CLERK, CIRCUIT COURT
FAIRFAX, VA 22034

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 Attachment A

Remote via video-conference

at Brown Rudnick LLP, 2211 Michelson Drive, Irvine, CA 92612 at March 26, 2020 at 10:00 a.m. PST,

LOCATION

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

John C. Depp, II

NAME OF REQUESTING PARTY

c/o Benjamin G. Chew, 601 Thirteenth Street, N.W., Suite 600

STREET ADDRESS

Washington

DC

20005

(202) 536-1700

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.

February 16th, 2021
DATE ISSUED

JOHN T. FREY, CLERK

by



Benjamin G. Chew
NAME OF ATTORNEY FOR REQUESTING PARTY
601 Thirteenth Street, N.W., Suite 600
OFFICE ADDRESS
Washington, DC 20005
OFFICE ADDRESS

29113
BAR NUMBER
VA
LICENSING STATE
(202) 536-1700
TELEPHONE NUMBER OF ATTORNEY
(202) 536-1701
FACSIMILE NUMBER OF ATTORNEY

NAME
STREET ADDRESS
STREET ADDRESS

BAR NUMBER
LICENSING STATE
TELEPHONE NUMBER
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LICENSING STATE
TELEPHONE NUMBER
FACSIMILE NUMBER

RETURN OF SERVICE (see page three of this form)

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:

Benjamin G. Chew (VSB No. 29113)
Andrew C. Crawford (VSB No. 89093)
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bchew@brownrudnick.com
acrawford@brownrudnick.com

Camille M. Vasquez (*pro hac vice*)
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cvasquez@brownrudnick.com

Counsel for Plaintiff John C. Depp, II

SERVICE LIST

J. Benjamin Rottenborn (VSB No. 84796)
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Elaine Charlson Bredehoft (VSB No. 23766)
Carla D. Brown (VSB No. 44803)
Adam S. Nadelhaft (VSB No. 91717)
David E. Murphy (VSB No. 90938)
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anadelhaft@cbcblaw.com
dmurphy@cbcblaw.com

Counsel for Defendant Amber Laura Heard

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ATTACHMENT A

PERSON MOST QUALIFIED DESCRIPTION

Children’s Hospital Los Angeles (“CHLA”) is hereby requested and required to designate and produce the person or persons most qualified to testify on behalf of CHLA as to the following subjects:

1. The dates and amounts of Defendant Amber Laura Heard's promised donations to CHLA from her divorce settlement with Plaintiff John C. Depp, II (“Mr. Depp”), from 2016-present.
2. The dates and amounts of Ms. Heard's actual donations to CHLA from her divorce settlement with Mr. Depp, from 2016-present.
3. Any communications between CHLA and Ms. Heard related to Ms. Heard's actual or promised donations to CHLA from her divorce settlement with Mr. Depp, from 2016-present.
4. Any communications between CHLA and Ms. Heard related to any publicity for Ms. Heard's actual or promised donations to CHLA from her divorce settlement with Mr. Depp, from 2016-present.

ATTORNEY OR PARTY WITHOUT ATTORNEY (Name, State Bar number, and address): BROWN RUDNICK LLP LEO J. PRESIADO, #166721 / CAMILLE M. VASQUEZ, #273377 SAMUEL A. MONIZ, #313274 2211 Michelson Drive, Seventh Floor, Irvine, CA 92612 TELEPHONE NO.: (949) 752-7100 FAX NO. (Optional): (949) 252-1514 E-MAIL ADDRESS (Optional): lpresiado@brownrudnick.com /cvasquez@brownrudnick.com ATTORNEY FOR (Name): John C. Depp, II	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 90012 BRANCH NAME: Stanley Mosk	
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, Suite 320 CITY, STATE, AND ZIP CODE: Fairfax, Virginia 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):

 Person Most Qualified at Children's Hospital Los Angeles
 c/o Cogency Global Inc., 1325 J Street, Suite 1550, Sacramento, CA 95814

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: March 26, 2021	Time: 10:00 a.m. PST	Address: Remote via video-conference Brown Rudnick LLP, 2211 Michelson Drive, Irvine, CA 92612
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- 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:
 See Attachment 2

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 3

Continued on Attachment 3 (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	

4. Other terms or provisions from out-of-state subpoena, if any (specify):
See attached Fairfax County Circuit Court Subpoena

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: February 12, 2021

CAMILLE M. VASQUEZ

(TYPE OR PRINT NAME)

Attorney for John C. Depp, II
(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.

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

Date:

Date:

(SIGNATURE)

(SIGNATURE)

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ATTACHMENT 2

PERSON MOST QUALIFIED DESCRIPTION

Children’s Hospital Los Angeles (“CHLA”) is hereby requested and required to designate and produce the person or persons most qualified to testify on behalf of CHLA as to the following subjects:

1. The dates and amounts of Defendant Amber Laura Heard’s promised donations to CHLA from her divorce settlement with Plaintiff John C. Depp, II (“Mr. Depp”), from 2016-present.

2. The dates and amounts of Ms. Heard’s actual donations to CHLA from her divorce settlement with Mr. Depp, from 2016-present.

3. Any communications between CHLA and Ms. Heard related to Ms. Heard’s actual or promised donations to CHLA from her divorce settlement with Mr. Depp, from 2016-present.

4. Any communications between CHLA and Ms. Heard related to any publicity for Ms. Heard’s actual or promised donations to CHLA from her divorce settlement with Mr. Depp, from 2016-present.

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.)

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 Camille M. Vasquez (*pro hac vice*)
 Samuel A. Moniz
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 Joshua R. Treece (VSB No. 79149)
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 Carla D. Brown (VSB No. 44803)
 Adam S. Nadelhaft (VSB No. 91717)
 David E. Murphy (VSB No. 90938)
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 jcogger@grsm.com
 kblocher@grsm.com

Counsel for Defendant Amber Laura Heard

(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 1

(Add pages as required)

CERTIFICATE OF SERVICE


I HEREBY CERTIFY that on this 12th day of February 2021, I caused copies of the foregoing to be served via email (per written agreement between the Parties) on the following:

Elaine Charlson Bredehoft (VSB No. 23766)
Carla D. Brown (VSB No. 44803)
Adam S. Nadelhaft (VSB No. 91717)
David E. Murphy (VSB No. 90938)
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kblocher@grsm.com

Counsel for Defendant Amber Laura Heard



Benjamin G. Chew

brownrudnick

BENJAMIN G. CHEW
direct dial: 202.536.1785
bchew@brownrudnick.com

FILED
CIVIL INTAKE
2021 FEB 12 PM 12:12
JOHN T. FREY
CLERK, CIRCUIT COURT
FAIRFAX, VA

February 12, 2021

VIA HAND DELIVERY

The Honorable John T. Frey, Clerk
Fairfax County Circuit Court
4110 Chain Bridge Road, Suite 320
Fairfax, Virginia 22030

RE: *John C. Depp, II v. Amber Laura Heard*
Case No. CL-2019-0002911
Subpoena: Children's Hospital Los Angeles

Dear Mr. Frey,

Please find enclosed two copies of an original foreign subpoena for third-party witness Children's Hospital Los Angeles' pursuant to Virginia Code Section 8.01-412.10 and California Civil Procedure Code Section 2029.100, et seq. The enclosed subpoenas have been issued in accordance with both Acts and the reciprocal privileges included therein.

The enclosed will be served by private process server. Please file one copy of the subpoena with the Court's papers in this case and issue one copy in accordance with the Uniform Interstate Depositions and Discovery Act. Also enclosed is a check for the Court's fee. Thank you for your assistance.

Regards,

BROWN RUDNICK LLP



Benjamin G. Chew

Enclosures

Fairfax Circuit Court
Circuit Court
Receipt No. 924288
Receipt Date: 02/16/2021 10:26 AM

Received of: Andrew Charles Crawford, \$ 4.00

Four and 00/100

John C Depp II vs. Amber Laura Heard

Filer(s): Depp, John C II

<u>Case</u>	<u>Amount</u>
CL-2019-0002911	
Copy - Certified	4.00

Total: 4.00

Balance due court: \$ 0.00

Next fine/fee due date:

Next restitution due date:

Check (Num: 241, Exp: xx/xx)

Amount Tendered: 4.00

Overage: 0.00

Change Due: 0.00

John T. Frey, Clerk of Circuit Court

By: _____
Deputy Clerk
Clerk: CSMI32