VIRGINIA:

IN THE CIRCUIT COURT OF FAIRFAX COUNTY

JOHN C. DEPP, II

٧.

Plaintiff,

Civil Action No.: CL-2019-00022RK, CIRCUIT COURT

AMBER LAURA HEARD

Defendant.

CERTIFICATE OF COUNSEL

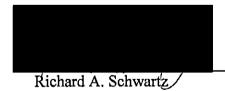
I, Richard A. Schwartz, counsel for Defendant, Amber Laura Heard, hereby certify that a copy of the following documents:

> Amended Subpoena for Production of Business Records in Action Pending Outside California; and Amended Subpoena Duces Tecum (Civil) - Attorney Issued - FilmLA:

Amended Subpoena for Production of Business Records in Action Pending Outside California; and Amended Subpoena Duces Tecum (Civil) - Attorney Issued - Jerry Bruckheimer Films; and

Amended Subpoena for Production of Business Records in Action Pending Outside California; and Amended Subpoena Duces Tecum (Civil) - Attorney Issued - Walt Disney Pictures

were emailed to counsel of record for Plaintiff (See Service List below), on the 21st day of August, 2019.



SERVICE LIST

John C. Depp, II v Amber Laura Heard Circuit Court of Fairfax County, Case No. CL-2019-0002911

Robert Gilmore (pro hac vice pending)
Kevin Attridge (pro hac vice pending)
STEIN MITCHELL BEATO
& MISSNER LLP
901 Fifteenth Street, NW, Suite 700
Washington, DC 20005
Tel. (202) 601-1602, or 1589
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rgilmore@steinmitchell.com;
kattridge@steinmitchell.com

م. ا

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THE ENDEAVOR LAW FIRM, P.C.
1775 Pennsylvania Avenue, NW, Suite 350
Washington, DC 20006

Benjamin G. Chew, Esq. (VSB 29113) Elliot J. Weingarten (pro hac vice) 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 eweingarten@brownrudnick.com

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Timothy J. McEvoy, Esq.
Sean Patrick Roche, Esq.
CAMERON/McEVOY, PLLC
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Fairfax, VA 22030
Tel. (703) 460-9343
Fax. (703) 273-8897
tmcevoy@cameronmcevoy.com
sroche@cameronmcevoy.com

Counsel for Plaintiff John C. Depp, II

Counsel for Defendant Amber Laura Heard

	SUBP-035
ATTORNEY OR PARTY WITHOUT ATTORNEY (Name, State flar number, and address): Richard A. Schwartz (SBN 267469)/ Milin Chun (SBN 262674)	FOR COURT USE ONLY
Browne George Ross LLP	
2121 Avenue of the Stars	F., _
Los Angeles, CA 90067	COURT SERVICES
TELEPHONE NO.: 310,274,7100 FAX NO.: 310,275,5697	COURT SERVICES
E-MAIL ADDRESS: rschwartz@bgrfirm.com	2010 1110 00
ATTORNEY FOR (Name): Defendant AMBER LAURA HEARD	2019 AUG 23 🗩 3: 02
Court for county in which discovery is to be conducted:	10Ust = '
SUPERIOR COURT OF CALIFORNIA, COUNTY OF	CLERK, CIPCUIT
STREET ADDRESS:	CLERK, CIRCUIT COURT FAIRFAX, VA
MAILING ADDRESS:	ДА, ҰД
CITY, STATE, AND ZIP CODE:	
BRANCH NAME:	
Court In which action is pending:	
Name of Court: In The Circuit 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	CALIFORNIA CASE NUMBER (if any assigned by court):
DEFENDANT/RESPONDENT: AMBER LAURA HEARD	·
SUBPOENA FOR PRODUCTION OF BUSINESS RECORDS 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 nu Film LA, 6255 W. Sunset Boulevard, 12th Floor, Hollywood, California 90028; Tel:	mber of deponent, If known): 213-977-8600
1. YOU ARE ORDERED TO PRODUCE THE BUSINESS RECORDS described in item	3, as follows:
To (name of deposition officer): First Legal Records Retrieval	
	10:00 a.m.
Location (address): 1511 West Beverly Boulevard, Los Angeles, California 90026	S
Do not release the requested records to the deposition officer prior to the	
a. So by delivering a true, legible, and durable copy of the business records describe wrapper with the title and number of the action, name of witness, and date of su wrapper shall then be enclosed in an outer envelope or wrapper, sealed, and maddress in item 1.	d in item 3, enclosed in a sealed inner ubpoena clearly written on it. The inner

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): September 13, 2019
Location (address): 1511 West Beverly Boulevard, Los Angeles, California 90026

Do not release the requested records to the deposition officer prior to the date and time stated above.

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.

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 1563(b). 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).

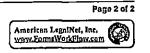
Attorneys

Oontinued on Attachment 4 (use form MC-025).

Page 1 of 2

www.courts.ca.gov

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 of Procedure section 1985.6 and a motion to quash or an objection the parties, witnesses, and consumer or employee affected muconsumer or employee records.	n has been served on you, a court order or agreement of
6. Other terms or provisions from out-of-state subpoena, if any (s	pecify): ´
Continued on Attachment 6 (use form MC-025).	
DISOBEDIENCE OF THIS SUBPOENA MAY BE PUNISHED AS C FOR THE SUM OF \$500 AND ALL DAMAGES RE	
Date issued: August 21, 2019	
Richard A. Schwartz	7 .
(TYPE OR PRINT NAME)	(SIGNATURE OF PERSON ISSUING SUBPOENA)
<u> </u>	Attorneys for Defendant AMBER LAURA HEARD
	(TITLE)
PROOF OF SERVICE O PRODUCTION OF BUS	
1. I served this Subpoena for Production of Business Records In Act to the person served as follows: a. Person served (name):	ion Pending Outside California by personally delivering a copy
b. Address where served:	
,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,	·
· 1	. 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 a	s 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 Consuby personally delivering a copy to the person served as described.	mer or Employee and Objection (form SUBP-025) ibed 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 	ornia process senier
De la Company de la constant de la Company d	
e. Exempt from registration under Business and Professions f. Registered professional photocopler	
g. Exempt from registration under Business and Profession	s 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	(For California sheriff or marshal use only)
California that the foregoing is true and correct.	I certify that the foregoing is true and correct. Date:
Date:	Date.
?	7
(SIGNATURE)	(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

- 1. Any and all Daily Production Reports from the set of City of Lies from April 13, 2017 to April 17, 2017.
- 2. Any and all metadata, including but not limited to, Custodian, eDoc_Author, eDoc_Create_DATE, eDoc_Create_TIME, eDoc_Mod-DATE, and eDoc_Mod_TIME, for the Daily Production Reports from the set of City of Lies from April 13, 2017 to April 17, 2017.

SHORT TITLE:

CASE NUMBER: CL-2019-0002911

JOHN C. DEPP, II v. AMBER LAURA HEARD	01-2010	0002011
ATTA	CHMENT (Number): 4	
(This Attachment may be Robert Gilmore (pro hac vice pending) STEIN MITCHELL BEATO & MISSNER LLP 901 Fifteenth Street, NW, Suite 700 Washington, DC 20005 Tel. (202) 601-1602, or 1589 Fax (202) 296-8312 rgilmore@steinmitchell.com	used with any Judicial Council form.) Counsel for John C. Depp	
Adam R. Waldman, Esq. (pro hac vice pending) THE ENDEAVOR LAW FIRM, P.C. 1775 Pennsylvania Avenue, NW, Suite 350 Washington, DC 20006	Counsel for John C. Depp	o, II
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),
Camille M. Vasquez (pro hac vice pending) BROWN RUDNICK LLP 2211 Michelson Drive Irvine, CA 92612 Tel. (949) 752-7100 Fax (949) 252-1514 cvasquez@brownrudnick.com	Counsel for John C. Dep	o, 1 l
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
Eric M. George, Esq. (SBN 166403) Richard A. Schwartz (SBN 267469) BROWNE GEORGE ROSS LLP 2121 Avenue of the Stars, Suite 2800 Los Angeles, CA 90067 Tel. (310) 274-7100 Fax. (310) 275-5697 egeorge@bgrfirm.com rschwartz@bgrfirm.com	Counsel for Amber Laura	a Heard
(If the Item that this Attachment concerns is made under pen	ally of perjury, all statements in this	Page of
Attachment are made under penalty of penury.)		(Add pages as required)

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

www.courtinfo.ca.gov American LegalNet, Inc. www.FormsWorkflow.com

ORT TITLE: JOHN C. DE	PP, II v. AMBER LA	AURA HEARD			CASE NUMBE CL-2019	R: -0002911		MC-02
<u> </u>		AT	TACHMENT	(Number): <u>6</u>			 .	
	(This Attachment may			Council 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)

www.courtinlo.ca.gov American LegalNet, Inc. www.FormsWorkflaw.com

SUBPOENA DUCES TECUM (CIVIL)		Case No :	CL2019-0002911
ATTORNEY ISSUED VA. CODE \$5 8.01-113, 16.1-49, 16	•		·
Commonwealth of Virginia Supremo Court Rules 1:4, 4:9	J, E-20J;	***************************************	3/2019 at 10:00 a.m.
-			EARING DATE AND TIME
Fai	rfax County Circui	***************************************	Cou
4110 Chain E	Bridge Road, Fairfa	, Virginia 22030	·
John C. Depp, II		A mher	Laura Heard
John С. Дорр, 11	V./111 Pe:		
TO THE PERSON AUTHORIZED BY	LAW TO SER	VE THIS PROCES	SS:
You are commanded to summon		•	
	., Inc., SERVE: Pat	l Audley, RA	•
~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~	NAME	***************************************	***************************************
6255	W. Sunset Blvd.,	2th Floor	***************************************
Hallywood	STREET ADDRESS	California	90028
Hollywood	STATE		ZIP
•			
TO the person summoned: You are condesignated and described below:  See Schedule A attached hereto.	·	·	•
designated and described below:			
designated and described below:  See Schedule A attached hereto.  First Legal Records Retrieval		,	
designated and described below:  See Schedule A attached hereto.  First Legal Records Retrieval  at1511 West Beverly Boulevard, Los Angeles,	CA 90026	at9/	
First Legal Records Retrieval at 1511 West Beverly Boulevard, Los Angeles, Location to permit such party or someone acting in tangible things in your possession, custod This Subpoena Duces Tecum is issued by	CA 90026 his or her behal y or control.	at9/ f to inspect and copy and on behalf of	
First Legal Records Retrieval  at 1511 West Beverly Boulevard, Los Angeles, to permit such party or someone acting in tangible things in your possession, custod This Subpoena Duces Tecum is issued by	CA 90026 his or her behalmy or control. the attorney for efendant Amber La	at9/ f to inspect and copy and on behalf of	, test or sample such
First Legal Records Retrieval at 1511 West Beverly Boulevard, Los Angeles, LOCATION to permit such party or someone acting in tangible things in your possession, custod This Subpoena Duces Tecum is issued by  Sean Patrick Roche/ Cameron McEvoy, PL	CA 90026 his or her behalmy or control. the attorney for efendant Amber La	at9/ f to inspect and copy and on behalf of	7, test or sample such
First Legal Records Retrieval at 1511 West Beverly Boulevard, Los Angeles, to permit such party or someone acting in tangible things in your possession, custod This Subpoena Duces Tecum is issued by  Sean Patrick Roche/ Cameron McEvoy, PLI NAME OF ATTORNEY	CA 90026 his or her behaley or control. the attorney for efendant Amber La	at9/ f to inspect and copy and on behalf of ara Heard	7, test or sample such 71412 STATE BAR NUMBER
First Legal Records Retrieval at 1511 West Beverly Boulevard, Los Angeles, LOCATION to permit such party or someone acting in tangible things in your possession, custod This Subpoena Duces Tecum is issued by  Sean Patrick Roche/ Cameron McEvoy, PLI NAME OF ATTORNEY 4100 Monument Corner Drive, Suite 420	CA 90026 his or her behaley or control. the attorney for efendant Amber La	at9/ f to inspect and copy and on behalf of ira Heard  VIRGINIA S 703	7, test or sample such
First Legal Records Retrieval  at	CA 90026 his or her behaley or control. the attorney for efendant Amber La	at9/ f to inspect and copy and on behalf of tra Heard  VIRGINIA S 703 TELEPHONE	71412 STATE BAR NUMBER -273-8898
First Legal Records Retrieval at 1511 West Beverly Boulevard, Los Angeles, LOCATION to permit such party or someone acting in tangible things in your possession, custod This Subpoena Duces Tecum is issued by  Sean Patrick Roche/ Cameron McEvoy, PLI NAME OF ATTORNEY 4100 Monument Corner Drive, Suite 420	CA 90026 his or her behaley or control. the attorney for efendant Amber La	at 9/ f to inspect and copy and on behalf of ira Heard  VIRGINIA S  703  TELEPHONE R  703	7, test or sample such 71412 STATE BAR NUMBER -273-8898 SUMBER OF ATTORNEY
First Legal Records Retrieval at 1511 West Beverly Boulevard, Los Angeles, LOCATION to permit such party or someone acting in tangible things in your possession, custod This Subpoena Duces Tecum is issued by  Sean Patrick Roche/ Cameron McEvoy, PLI NAME OF ATTORNEY 4100 Monument Corner Drive, Suite 420 OFFICE ADDRESS Fairfax, Virginia 22030	CA 90026 his or her behaley or control. the attorney for efendant Amber La	at 9/ f to inspect and copy and on behalf of ira Heard  VIRGINIA S  703  TELEPHONE R  703	71412 STATE BAR NUMBER -273-8898 SUMBER OF ATTORNEY -273-8897
First Legal Records Retrieval at 1511 West Beverly Boulevard, Los Angeles, LOCATION to permit such party or someone acting in tangible things in your possession, custod This Subpoena Duces Tecum is issued by  Sean Patrick Roche/ Cameron McEvoy, PLI NAME OF ATTORNEY 4100 Monument Corner Drive, Suite 420 OFFICE ADDRESS Fairfax, Virginia 22030	CA 90026 his or her behaley or control. the attorney for efendant Amber La	atat	71412 STATE BAR NUMBER -273-8898 SUMBER OF ATTORNEY -273-8897

RETURN OF SERVICE (see page two of this form)

		sis of your objection in that wr	<del></del>	who must provide
-	n authorized to s	e with Va. Code § 8.01-325.	ution, the return of th	is process shall be
NAME:	.,		***************************************	
ADDRESS:			,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,	}}-
\$			***************************************	
PERSON.	AL SERVICE	Tel. No.		
Being unable	to make personal	service, a copy was delivered	n the following man	ner:
		ve after giving information of	its purport. List nam	ne, age of recipient,
Posted o	on front door or st	o party named above:  uch other door as appear to be to be a support to be	he main entrance of	usual place of abod
Posted o	on front door or su listed above. (Oth	ich other door as appear to be t ner authorized recipient not fou	nd.)	usual place of abod
Posted o	on front door or su listed above. (Oth UND	uch other door as appear to be t	nd.) , Sheriff	
Posted of address NOT FOR	on front door or su listed above. (Oth UND	ich other door as appear to be t ner authorized recipient not fou	nd.) Sheriff Deputy Sl	<del> </del>
Posted of address NOT FOR	on front door or su listed above. (Oth UND by	uch other door as appear to be the authorized recipient not fou	nd.) , Sheriff Deputy Sl	neriff
Posted of address NOT FOR	on front door or su listed above. (Oth UND by	ch other door as appear to be the ner authorized recipient not fou	nd.) , Sheriff Deputy Sh UNSEL Defendant	neriff, hereby certi
Posted of address  NOT FOU  DATE  I,	on front door or su listed above. (Oth UND by	CERTIFICATE OF CO  , counsel for bpoena duces tecum was	nd.) , Sheriff Deputy Sh UNSEL Defendant email	heriff hereby certi
Posted of address  NOT FOU  DATE  I,	on front door or su listed above. (Oth UND by	ch other door as appear to be the ner authorized recipient not fou	nd.) , Sheriff Deputy Sh UNSEL Defendant email	heriff hereby certi
Posted of address  NOT FOR DATE  I, that a copy of to	by Sean Patrick Roche  f the foregoing su	CERTIFICATE OF CO  , counsel for bpoena duces tecum was	Deputy St  UNSEL  Defendant  email  DELIVERY METHO  for	heriff , hereby certifed Plaintiff

NOTICE: Upon receipt of the subpoenaed documents, the requesting party must, if requested, provide true and full copies of those documents to any other party or to the attorney for any other party, provided the other party or attorney for the other party pays the reasonable cost of copying or reproducing those documents. This does not apply when the subpoenaed documents are returnable to and maintained by the clerk of the court in which the action is pending. Va. Code § 8.01-417

#### SCHEDULE A

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

## DOCUMENTS TO BE PRODUCED UNDER THIS SUBPOENA

- Any and all Daily Production Reports from the set of City of Lies from April 13,
   2017 to April 17, 2017.
- 2. Any and all metadata, including but not limited to, Custodian, eDoc_Author, eDoc_Create_DATE, eDoc_Create_TIME, eDoc_Mod-DATE, and eDoc_Mod_TIME, for the Daily Production Reports from the set of City of Lies from April 13, 2017 to April 17, 2017.

	SUBP-0
ATTORNEY OR PARTY WITHOUT ATTORNEY (Name, State Bar number, and address): Richard A. Schwartz (SBN 267469)/ Milin Chun (SBN 262674)	FOR COURT USE ONLY
Browne George Ross LLP 2121 Avenue of the Stars	FUED
Los Angeles, CA 90067  TELEPHONE NO.: 310.274.7100  E-MAIL ADDRESS: rschwartz@bgrfirm.com	COURT SERVIC
ATTORNEY FOR (Name): Defendant AMBER LAURA HEARD  Court for county in which discovery is to be conducted:  SUPERIOR COURT OF CALIFORNIA, COUNTY OF	2019 AUG 23 (D) 3
STREET ADDRESS: MAILING ADDRESS:	CLERK, CIRCUIT CO FAIRFAX, VA
STAY, STATE, AND ZIP CODE: BRANCH NAME:	,
Court in which action is pending:  Name of Court: In The Circuit Court of Fairfax County, Virginia  street address: 4110 Chain Bridge Road  MAILING ADDRESS:	
TY, STATE, AND ZIP CODE: Fairfax, VA 22030-4009  COUNTRY: U.S.A.	
PLAINTIFF/PETITIONER: JOHN C. DEPP, II	CALIFORNIA CASE NUMBER (If any assigned by court):
DEFENDANT/RESPONDENT: AMBER LAURA HEARD	
SUBPOENA FOR PRODUCTION OF BUSINESS RECORDS IN ACTION PENDING OUTSIDE CALIFORNIA	CASE NUMBER (of action pending outside California): CL-2019-0002911

1.	YOU ARE ORDERED TO PRODUCE THE BUSINESS RECORDS described in Item 3, as follows:
Ī	To (name of deposition officer): First Legal Records Retrieval
	On (date): September 13, 2019 At (time): 10:00 a.m.
	Location (address): 1511 West Beverly Boulevard, Los Angeles, California 90026
	Do not release the requested records to the deposition officer prior to the date and time stated above.
	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).
İ	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.
	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.  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
ļ	Continued on Attachment 3 (use form MC-025).
<b>4</b> .	<ol> <li>Attorneys of record in this action or parties without attorneys are (name, address, telephone number, and name of party represented): See Attachment 4</li> </ol>
 	Continued on Attachment 4 (use form MC-025).     Page 1 of 2

**SUBP-035** 

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 8 (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.	PLAINTIFF/PETITIONER: JOHN C. DEPP, II	CASE NUMBER (of action pending outside California):
5. If you have been served with this subpoens 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 count 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 subpoens, if any (specify):  Continued on Attachment 8 (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: August 21, 2019  Richard Schwertz  (TYPE OF FRANT NAME)  PROOF OF SERVICE OF SUBPOENA FOR PRODUCTION OF BUSINESS RECORDS  1. I served this Subpoens 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:  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:  amount tendered was (specify):  g. Free for service:  by personally delivering a copy to the person served as described in 1 above.  Person 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.  Person service:  C. Fee service:  C. Fee for service:		\ \ \ \ \ \ \ \ \ \ \ \ \ \ \ \ \ \ \
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-stale subpoena, if any (specify):  Continued on Attachment 8 (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: August 21, 2019  Richard Schwartz  (TYPE OR PRINT NAME)  PROOF OF SERVICE OF SUBPOENA FOR PRODUCTION OF BUSINESS RECORDS  1. Issued 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 manue;  b. Address where served:  c. Date of delivery;  e. Witness fees and mileage both ways (check one):  (1)   were patid, Amount:   \$	DEFENDANT/RESPONDENT: AMBER LAURA HEARD	
DISOBEDIENCE OF THIS SUBPOEMA 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: August 21, 2019  Richard Schwartz  (TYPE OR PRINT NAME)  PROOF OF SERVICE OF SUBPOEMA FOR PRODUCTION OF BUSINESS RECORDS  1. I served this Subpoema for Production of Business Records in Action Pending Outside California by personally delivering a copy to the 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 paid. Amount: (3)   were tendered to the witness's public entity employer as required by Government Code section 88097.2. The amount tendered was (specify):  f. Fee for service:  2. I received this subpoema for service on (date): 3.   l 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 shertiff 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 22350(b) f.   Registered professional photocopier g.   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:  lideclare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.  Date:	Procedure section 1985.6 and a motion to quash or an objection the parties, witnesses, and consumer or employee affected must	n has been served on you, a court order or agreement of
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: August 21, 2019  Richard Schwartz  (TYPE OR PRINT NAME)  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:  e. Witness fees and mileage both ways (check one):  (1) were paid. Amount	6. Other terms or provisions from out-of-state subpoena, if any (se	pecify):
FOR THE SUM OF \$500 AND ALL DAMAGES RESULTING FROM YOUR FAILURE TO OBEY.    Richard Schwartz	☑ Continued on Attachment 6 (use form MC-025).	
Richard Schwartz  (TYPE OR PRINT NAME)  Attorneys for Defendant AMBER LAURA HEARD  PROOF OF SERVICE OF SUBPOENA FOR PRODUCTION OF BUSINESS RECORDS  1.   served this Subpoens 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:      lates 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    d.   Employee or independent contractor of a registered California process server    d.   Employee or independent contractor of a registered California process server    d.   Registered Professional photocopler    f.   Registered professional photocopler    g.   Exempt from registration under Business and Professions Code section 22451    h. Name, address, telephone number, and, if applicable, county of registration and number:  Idectare under penalty of perjury under the laws of the State of California sheriff or marshal use only) I certify that the foregoing is true and correct. Date:	DISOBEDIENCE OF THIS SUBPOENA MAY BE PUNISHED AS C FOR THE SUM OF \$500 AND ALL DAMAGES RES	ONTEMPT BY THIS COURT. YOU WILL ALSO BE LIABLE SULTING FROM YOUR FAILURE TO OBEY.
Attorneys for Defendant AMBER LAURA HEARD  PROOF OF SERVICE OF SUBPOENA FOR PRODUCTION OF BUSINESS RECORDS  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 patd. Amount: \$  (2) were not paid.  (3) were tendered to the witness's public entity employer as required by Government Code section 88097.2. The amount tendered was (specify):  f. Fee for service: \$  1 received this subpoena for service on (date):  3 lates 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:  Ildectare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.  Date:	Date issued: August 21, 2019	
Attorneys for Defendant AMBER LAURA HEARD  PROOF OF SERVICE OF SUBPOENA FOR PRODUCTION OF BUSINESS RECORDS  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 patd. Amount: \$  (2) were not paid.  (3) were tendered to the witness's public entity employer as required by Government Code section 88097.2. The amount tendered was (specify):  f. Fee for service: \$  1 received this subpoena for service on (date):  3 lates 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:  Ildectare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.  Date:	Piek and Oakssenter	<b>&gt;</b>
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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 and comme):  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 patd. Amount:  (2) were not pald.  (3) were tendered to the witness's public entity employer as required by Government Code section 89097.2. The amount tendered was (specify):  f. Fee for service:  \$  1. 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 photocopler  g. Exempt from registration under Business and Professions Code section 22451  h. Name, address, telephone number, and, if applicable, county of registration and number:  1 declare under penalty of perjury under the laws of the State of California sheriff or marshal use only) I certify that the foregoing is true and correct.  Date:		( )
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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 photocopler 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:  Date:	3.   l also served a completed <i>Proof of Service of Notice to Consul</i> by personally delivering a copy to the person served as descri	mer or Employee and Objection (form SUBP-025) bed in 1 above.
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:    Continue that the foregoing is true and correct. Date:	a. Not a 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:  1 declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.  Date:  Date:	·	·
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f. Registered professional photocopler 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:    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 Callfornia that the foregoing is true and correct.  Date:  (For California sheriff or marshal use only) I certify that the foregoing is true and correct.  Date:	f. Registered professional photocopler	•
I declare under penalty of perjury under the laws of the State of Callfornia that the foregoing is true and correct.  Date:  (For California sheriff or marshal use only) I certify that the foregoing is true and correct.  Date:	g. Exempt from registration under Business and Professions	s Code section 22451
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Date: Date:		I certify that the foregoing is true and correct.
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(SIGNATURE)		<b>•</b>
	(SIGNATURE)	(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

- 1. Any and all Daily Production Reports from the set of Pirates of the Caribbean:

  Dead Man Tell No Tales from February 17, 2015 through July 21, 2015.
- 2. Any and all metadata, including but not limited to, Custodian, eDoc_Author, eDoc_Create_DATE, eDoc_Create_TIME, eDoc_Mod_DATE, and eDoc_Mod_TIME, for Daily Production Reports from the set of Pirates of the Caribbean: Dead Man Tell No Tales from February 17, 2015 through July 21, 2015.
- 3. Any and all Daily Production Reports from the set of Pirates of the Caribbean: Dead Man Tell No Tales from March 24, 2016 through April 13, 2016.
- 4. Any and all metadata, including but not limited to, Custodian, eDoc_Author,
  eDoc_Create_DATE, eDoc_Create_TIME, eDoc_Mod_DATE, and eDoc_Mod_TIME, for Daily
  Production Reports from the set of Pirates of the Caribbean: Dead Man Tell No Tales from
  March 24, 2016 through April 13, 2016.

SHORT TITLE: JOHN C. DEPP, II v. AMBER LAURA HEARD

CASE NUMBER: CL-2019-0002911

<b>ATTACHMENT</b>	(Number):	
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(This Attachment may be used with any Judicial Council form.)

Robert Gilmore (pro hac vice pending) STEIN MITCHELL BEATO & MISSNER LLP

901 Fifteenth Street, NW, Suite 700

Washington, DC 20005

Tel. (202) 601-1602, or 1589

Fax (202) 296-8312

rgilmore@steinmitchell.com

Adam R. Waldman, Esq. (pro hac vice pending)

THE ENDEAVOR LAW FIRM, P.C.

17/75 Pennsylvania Avenue, NW, Suite 350

Washington, DC 20006

Benjamin G. Chew, Esq. (VSB 29113)

Elliot J. Weingarten (pro hac vice pending)

Andrew C. Crawford (VSB No. 89093)

**BROWN RUDNICK LLP** 

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(202) 536-1701 - FAX

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Camille M. Vasquez (pro hac vice pending)

**BROWN RUDNICK LLP** 

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Fax (949) 252-1514

cvasquez@brownrudnick.com

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Sean Patrick Roche, Esq. (VSB No. 71412)

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Eric M. George, Esq. (SBN 166403)

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Tel. (310) 274-7100

Fax. (310) 275-5697

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rschwartz@bgrfirm.com

Counsel for John C. Depp, Il

Counsel for John C. Depp, II

Counsel for John C. Depp, II

Counsel for John C. Depp, II

Counsel for Amber Laura Heard

Counsel for 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 ___ (Add pages as required)

> www.courtinto.ca.gov American LegalNet, Inc.

www.FormsWorkflow.com

	<del></del> _	MC-025
SHORT TITLE: JOHN C. DEPP, II v. AMBER LAURA HEARD	CASE NUMBER: CL-2019-000291	1
ATTACHMENT (Number): 6		
(This Attachment may be used with any Judicial	Council form.)	
ee attached Fairfax County Circuit Court Subpoena		
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Attachment are made under penalty of perjury.)		(Add pages as required)

SUBPOENA DUCES TECUM (CIVIL) -		Case No.:	CL2019-0002911
ATTORNEY ISSUED VA. CODB 55 8.01-413, 16.1-89, 16.1-	265;	6/1	3/2019 at 10:00 a.m.
Commonwealth of Virginia Supreme Court Rules 1:4,4:9		717 Fad+Connect+** annennantabet+************************************	EARING DATE AND TIME
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John C. Depp, II	v./In re:	Amber	Laura Heard
TO THE PERSON AUTHORIZED BY L	AW TO SERV	E THIS PROCES	SS:
You are commanded to summon	er Films, SERVE: J	ern Bruckheimer	
,	NAME	**************************************	***************************************
	1631 10th Street		
	STREET ADDRESS		90404-3705
Santa Monica	STATE	Manager of the second s	ZIP
lesignated and described below:	ianded to make		
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lesignated and described below:  See Schedule A attached hereto.  First Leval Records Retrieval			
designated and described below:  See Schedule A attached hereto.  First Legal Records Retrieval  at 1511 West Beverly Boulevard, Los Angeles	, CA 90026	at9/	13/2019 at 10:00 a.m.
First Legal Records Retrieval at 1511 West Beverly Boulevard, Los Angeles to permit such party or someone acting in h tangible things in your possession, custody This Subpoena Duces Tecum is issued by the	, CA 90026 is or her behalf or control. ne attorney for a	at9/ to inspect and copy and on behalf of	13/2019 at 10:00 a.m.
First Legal Records Retrieval at 1511 West Beverly Boulevard, Los Angeles Location to permit such party or someone acting in h tangible things in your possession, custody This Subpoena Duces Tecum is issued by the Defe	, CA 90026 is or her behalf or control. he attorney for a	at9/ to inspect and copy and on behalf of the ard	13/2019 at 10:00 a.m.  DATE AND TIME  7, test or sample such
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First Legal Records Retrieval at 1511 West Beverly Boulevard, Los Angeles to permit such party or someone acting in h tangible things in your possession, custody This Subpoena Duces Tecum is issued by the Sean Patrick Roche/ Cameron McEvoy, PLLC NAME OF ATTORNEY	, CA 90026 is or her behalf or control. he attorney for a	at9/ to inspect and copy and on behalf of theard  VIRGINIAS 703	13/2019 at 10:00 a.m.  DATE AND TIME 7, test or sample such 71412 TTATE BAR NUMBER -273-8898 RUMBER OF ATTORNEY
First Legal Records Retrieval at	, CA 90026 is or her behalf or control. he attorney for a	at 9/ to inspect and copy and on behalf of Heard VIRGINIA S 703 TELEPHONE N 703	13/2019 at 10:00 a.m.  DATE AND TIME  7, test or sample such  71412  TATE BAR NUMBER  -273-8898  NUMBER OF ATTORNEY  -273-8897
First Legal Records Retrieval at 1511 West Beverly Boulevard, Los Angeles LOCATION to permit such party or someone acting in h tangible things in your possession, custody  This Subpoena Duces Tecum is issued by the Defe  Sean Patrick Roche/ Cameron McEvoy, PLLC  NAME OF ATTORNEY  4100 Monument Corner Drive, Suite 420  OFFICE ADDRESS	, CA 90026 is or her behalf or control. he attorney for a	at 9/ to inspect and copy and on behalf of Heard VIRGINIA S 703 TELEPHONE N 703	13/2019 at 10:00 a.m.  DATE AND TIME 7, test or sample such 71412 TTATE BAR NUMBER -273-8898 RUMBER OF ATTORNEY
First Legal Records Retrieval at	, CA 90026 is or her behalf or control. he attorney for a	at 9/ to inspect and copy and on behalf of Heard VIRGINIA S 703 TELEPHONE N 703	13/2019 at 10:00 a.m.  DATE AND TIME  7, test or sample such  71412  TATE BAR NUMBER  -273-8898  NUMBER OF ATTORNEY  -273-8897

RETURN OF SERVICE (see page two of this form)

		CUM is being served by a private e with Va. Code § 8.01-325.	process server who	must provid
TO the personade to the	son authorized to clerk of court.	serve this process: Upon execution	n, the return of this j	process shall b
NAME:				******************************
		·		
ADDRESS:	***************************************			
PERSO	NAL SERVICE	Tel.   No		
Being unabl	le to make personal	l service, a copy was delivered in th	e following manner	4.1
	•	to party named above:		•
Poste	d on front door or s	such other door as appear to be the r	nain entrance of usu	al place of abo
addres	ss listed above. (Ot	such other door as appear to be the re- ther authorized recipient not found.)	main entrance of ust	ual place of abo
addres	ss listed above. (Ot	such other door as appear to be the r	main entrance of ust	ial place of abo
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addres	ss listed above. (Ot	such other door as appear to be the richer authorized recipient not found.)	nain entrance of usu ), Sheriff, Deputy Sher	nal place of abo
Address NOT F	by	certificate of count	nain entrance of usu ), Sheriff Deputy Sher	iff
Address NOT F	by Sean Patrick Roch	certificate of counse	nain entrance of usu ), Sheriff, Deputy Sher SEL  Defendant	iff
Address NOT F  DATE  I,	by Sean Patrick Roch	CERTIFICATE OF COUNS  c counsel for	nain entrance of usu ), Sheriff, Deputy Sher SEL  Defendantemailed	iff hereby cer
Address NOT F  DATE  I,	by Sean Patrick Roch	certificate of counse	nain entrance of usu ), Sheriff, Deputy Sher SEL  Defendantemailed	iff hereby cer
I, that a copy	by Sean Patrick Roch of the foregoing su	CERTIFICATE OF COUNS  e , counsel for , counsel of record for , counsel of record for	nain entrance of usu ) , Sheriff  Deputy Sher  SEL  Defendant  emailed  DELIVERY METHOD  Plai	iff hereby cer
I, that a copy	by Sean Patrick Roch of the foregoing su	CERTIFICATE OF COUNS  c counsel for	nain entrance of usu ) , Sheriff  Deputy Sher  SEL  Defendant  emailed  DELIVERY METHOD  Plai	iff hereby cer
I, that a copy	by Sean Patrick Roch of the foregoing su	CERTIFICATE OF COUNS  e , counsel for , counsel of record for , counsel of record for	nain entrance of usu ) , Sheriff  Deputy Sher  SEL  Defendant  emailed  DELIVERY METHOD  Plai	iff , hereby cer

### SCHEDULE A

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

## DOCUMENTS TO BE PRODUCED UNDER THIS SUBPOENA

- 1. Any and all Daily Production Reports from the set of Pirates of the Caribbean:
  Dead Man Tell No Tales from February 17, 2015 through July 21, 2015.
- 2. Any and all metadata, including but not limited to, Custodian, eDoc_Author,
  eDoc_Create_DATE, eDoc_Create_TIME, eDoc_Mod_DATE, and eDoc_Mod_TIME, for Daily
  Production Reports from the set of Pirates of the Caribbean: Dead Man Tell No Tales from
  February 17, 2015 through July 21, 2015.
- 3. Any and all Daily Production Reports from the set of Pirates of the Caribbean: Dead Man Tell No Tales from March 24, 2016 through April 13, 2016.
- 4. Any and all metadata, including but not limited to, Custodian, eDoc_Author, eDoc_Create_DATE, eDoc_Create_TIME, eDoc_Mod_DATE, and eDoc_Mod_TIME, for Daily Production Reports from the set of Pirates of the Caribbean: Dead Man Tell No Tales from March 24, 2016 through April 13, 2016.

	SUBP-035
ATTORNEY OR PARTY WITHOUT ATTORNEY (Name, Stale Bernumber, and address): Richard A. Schwartz (SBN 267469)/ Milin Chun (SBN 262674)	FOR COURT USE ONLY
Browne George Ross LLP	
2121 Avenue of the Stars	
Los Angeles, CA 90067	COURT SERVICES
TELEPHONE NO.: 310.274.7100 FAX NO.: 310.275.5697	COURT SERVICES
E-MAIL ADDRESS: rschwartz@bgrfirm.com	2010 AUC 00 00 00
ATTORNEY FOR (Name): Defendant AMBER LAURA HEARD	2019 AUG 23 ⊃ 3: 0:2
Court for county in which discovery is to be conducted:	JOHN T. FDF.V
SUPERIOR COURT OF CALIFORNIA, COUNTY OF	JOHN T. FREY CLERK, CIRCUIT COURT
STREET ADDRESS:	CLERK, CIRCUIT COURT FAIRFAX, VA
MAILING ADDRESS:	
CITY, STATE; AND ZIP CODE:	
BRANCH NAME:	
Court in which action is pending:	
Name of Court: In The Circuit 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	CALIFORNIA CASE NUMBER (if any assigned by court):
DEFENDANT/RESPONDENT: AMBER LAURA HEARD	·
SUBPOENA FOR PRODUCTION OF BUSINESS RECORDS 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): 22: Tel: 818-560-1000

1. 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): September 13, 2019 At (time): 10:00 a.m.
	Location (address): 1511 West Beverly Boulevard, Los Angeles, California 90026
	Do not release the requested records to the deposition officer prior to the date and time stated above.
16	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.
: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.
	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 subposens, or 15 days after service, whichever date is later). Reasonable costs of locating records, making them evallable 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.  The records to be produced are described as follows (if electronically stored information is demanded, the form or forms in which
4.	each type of Information is to be produced may be specified): See Attachment 3  Continued on Attachment 3 (use form MC-025).  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).  Page 1 of 2

· · · · · · · · · · · · · · · · · · ·	
PLAINTIFF/PETITIONER: JOHN C. DEPP, II	CASE NUMBER (of action panding outside Califords): CL-2019-0002911
DEFENDANT/RESPONDENT: AMBER LAURA HEARD	
5. If you have been served with this subpoena as a custodian of c Procedure section 1985.6 and a motion to quash or an objectio the parties, witnesses, and consumer or employee affected mu consumer or employee records.	n has been served on you. a court order or agreement of
6. Other terms or provisions from out-of-state subpoena, if any (st	pecify):
1	•
Continued on Attachment 6 (use form MC-025).	
DISOBEDIENCE OF THIS SUBPOENA MAY BE PUNISHED AS C FOR THE SUM OF \$500 AND ALL DAMAGES RE	CONTEMPT BY THIS COURT. YOU WILL ALSO BE LIABLE SULTING FROM YOUR FAILURE TO OBEY.
Daté issued: August 21, 2019	
Richard A. Schwartz	<b>&gt;</b>
(TYPE OR PRINT NAME)	(SIGNATURE OF PERSON ISSUING SUBPORNA)
	Attorneys for Defendant AMBER LAURA HEARD
•	(TITLE)
PROOF OF SERVICE O	
PRODUCTION OF BUS	
<ol> <li>I served this Subpoena for Production of Business Records in Act to the person served as follows:</li> <li>a. Person served (name):</li> </ol>	ion Pending Outside California by personally delivering a copy
b. Address where served:	
	Time of delivery
o, bate of denitory.	. Time of delivery:
e. Witness fees and mileage both ways (check one):	
<ul> <li>(1) ☐ were paid. Amount:\$</li> <li>(2) ☐ were not paid.</li> <li>(3) ☐ were tendered to the witness's public entity employer a</li> </ul>	•
amount tendered was (specify): \$	·
f. Fee for service:\$	
2.1 I received this subpoena for service on (date):	
3.  also served a completed Proof of Service of Notice to Consu	mer or Employee and Objection (form SUBP-025)
by personally delivering a copy to the person served as descr	Ded III 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 Calif	ornia process server
e. Exempt from registration under Business and Profession	s Code section 2235U(D)
f. Registered professional photocopier	c Code section 22451
g. Exempt from registration under Business and Profession h. Name, address, telephone number, and, if applicable, county	of registration and number:
The Mainton addition, total printing the state of the sta	-
the Other of	(5 Outservie should or marghal use only)
I declare under penalty of perjury under the laws of the State of	(For California sheriff or marshal use only) I certify that the foregoing is true and correct.
California that the foregoing is true and correct.  Date:	Date:
Date.	•
(SIGNATURE)	(SIGNATURE)
, laiona) onel	•

### Attachment 3

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

# DOCUMENTS TO BE PRODUCED UNDER THIS SUBPOENA

- 1. Any and all Daily Production Reports from the set of Pirates of the Caribbean: Dead Man Teil No Tales from February 17, 2015 through July 21, 2015.
- 2. Any and all metadata, including but not limited to, Custodian, eDoc_Author, eDoc_Create_DATE, eDoc_Create_TIME, eDoc_Mod_DATE, and eDoc_Mod_TIME, for Daily Production Reports from the set of Pirates of the Caribbean: Dead Man Tell No Tales from February 17, 2015 through July 21, 2015.
- 3. Any and all Daily Production Reports from the set of Pirates of the Caribbean: Dead Man Tell No Tales from March 24, 2016 through April 13, 2016.
- 4. Any and all metadata, including but not limited to, Custodian, eDoc_Author,
  eDoc_Create_DATE, eDoc_Create_TIME, eDoc_Mod_DATE, and eDoc_Mod_TIME, for Daily
  Production Reports from the set of Pirates of the Caribbean: Dead Man Tell No Tales from
  March 24, 2016 through April 13, 2016.

SHORT TITLE:

JOHN C. DEPP, II v. AMBER LAURA HEARD

CASE NUMBER: CL-2019-0002911

Counsel for John C. Depp, II

Counsel for John C. Depp, II

Counsel for John C. Depp, II

Counsel for Amber Laura Heard

Counsel for Amber Laura Heard

ATTA	CHMENT	(Number	):	Ļ
	(OI 1141 E 1 4 )	(110111001	,.	

(This Attachment may be used with any Judicial Council form.) Counsel for John C. Depp, II

Robert Gilmore (pro hac vice pending) STEIN MITCHELL BEATO & MISSNER LLP 901 Fifteenth Street, NW, Suite 700 Washington, DC 20005 Tel. (202) 601-1602, or 1589

Fax (202) 296-8312

rgilmore@steinmitchell.com

Adam R. Waldman, Esq. (pro hac vice pending)

THE ENDEAVOR LAW FIRM, P.C.

1775 Pennsylvania Avenue, NW, Suite 350

Washington, DC 20006

Benjamin G. Chew, Esq. (VSB 29113)

Elllot 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

Camille M. Vasquez (pro hac vice pending)

BROWN RUDNICK LLP.

2211 Michelson Drive

Irvine, CA 92612

Tel. (949) 752-7100

Fax (949) 252-1514

cvasquez@brownrudnick.com

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

Eric M. George, Esq. (SBN 166403)

Richard A. Schwartz (SBN 267469)

BROWNE GEORGE ROSS LLP

2121 Avenue of the Stars, Suite 2800

Los Angeles, CA 90067

Tel. (310) 274-7100

Fax. (310) 275-5697

egeorge@bgrfirm.com

rschwartz@bgrfirm.com

(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

(Add pages as required)

www.courtinfo.ca.gov American LegalNel, Inc. www.FormsWorkflow.com

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

ATTACHMENT to Judicial Council Form

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

SUBPOENA DUCES TECUM (CIV	VIL) –	Case No.:	CL2019-0002911
ATTORNEY ISSUED VA. CODB 45 8.01-413, 1	<del>-</del>	_	
ommonwealth of Virginia Supreme Court Rules 1:4	, 4:9	*******************************	/2019 at 10:00 a.m.
	Painfan Canata Cianti		
			Cou
4110 C	hain Bridge Road, Fairfax	Virginia 22030	
John C. Depp, II	v./In re:	Amber L	aura Heard
O THE PERSON AUTHORIZED	BY LAW TO SERV	E THIS PROCESS	S:
ou are commanded to summon			
Walt I	Disney Pictures, SERVE: 1	Marsha L. Reed	
, ją jogo 1 de 1000 1000 1000 1000 1000 1000 1000	NAME 500 S. Buena Vista S	traat	
	, STREET ADDRESS		>>====================================
Burbank	,	California	91521
CITY	STATE		ZIP
esignated and described below:			•
esignated and described below:			-
lesignated and described below: See Schedule A attached hereto.			2/2010 et 10:00 e m
lesignated and described below: See Schedule A attached hereto.  First Legal Records Retrieval at 1511 West Beverly Boulevard, Los A		at9/13	3/2019 at 10:00 a.m.
First Legal Records Retrieval  at	ngeles, CA 90026  ng in his or her behalf ustody or control.  ed by the attorney for a Defendant Amber Law	to inspect and copy,	
First Legal Records Retrieval  1511 West Beverly Boulevard, Los A LOCATION o permit such party or someone actinangible things in your possession, cu	ngeles, CA 90026  ng in his or her behalf ustody or control.  ed by the attorney for the defendant Amber Law PARTY NAME	to inspect and copy, and on behalf of a Heard	test or sample such
First Legal Records Retrieval  at1511 West Beverly Boulevard, Los A LOCATION to permit such party or someone actinangible things in your possession, cu	ngeles, CA 90026  ng in his or her behalf ustody or control.  ed by the attorney for the defendant Amber Law PARTY NAME	to inspect and copy, and on behalf of a Heard	0110217
First Legal Records Retrieval  This Legal Records Retrieval  Location  Permit such party or someone action angible things in your possession, cu  Sean Patrick Roche/ Cameron McEvo	ngeles, CA 90026  ng in his or her behalf ustody or control.  ed by the attorney for a Defendant Amber Laur PARTY NAME y, PLLC	to inspect and copy, and on behalf of a Heard  7 VIRGINIA ST	test or sample such
First Legal Records Retrieval  at1511 West Beverly Boulevard, Los A LOCATION  to permit such party or someone action angible things in your possession, ou one of the such party of the subpoena Duces Tecum is issued.  Sean Patrick Roche/ Cameron McEvo	ngeles, CA 90026  ng in his or her behalf ustody or control.  ed by the attorney for a Defendant Amber Laur PARTY NAME y, PLLC	to inspect and copy, and on behalf of a Heard  7 VIRGINIA ST. 703-2	test or sample such  1412  TE BAR NUMBER
First Legal Records Retrieval  At 1511 West Beverly Boulevard, Los A LOCATION To permit such party or someone acting angible things in your possession, cu  This Subpoena Duces Tecum is issued.  Sean Patrick Roche/ Cameron McEvoname of Attorney  4100 Monument Corner Drive, Suit	ngeles, CA 90026  ng in his or her behalf ustody or control.  ed by the attorney for a Defendant Amber Laur PARTY NAME y, PLLC	to inspect and copy, and on behalf of a Heard  7 VIRGINIA ST. 703-2 TELEPHONE NU 703-2	1412 ATE BAR NUMBER 273-8898 MHER OF ATTORNEY 273-8897
First Legal Records Retrieval  At 1511 West Beverly Boulevard, Los A LOCATION  to permit such party or someone active tangible things in your possession, cu  This Subpoena Duces Tecum is issue  Sean Patrick Roche/ Cameron McEvo  NAME OF ATTORNEY  4100 Monument Corner Drive, Suit  OFFICE ADDRESS	ngeles, CA 90026  ng in his or her behalf ustody or control.  ed by the attorney for a Defendant Amber Laur PARTY NAME y, PLLC	to inspect and copy, and on behalf of a Heard  7 VIRGINIA ST. 703-2 TELEPHONE NU 703-2	1412 ATE BAR NUMBER 273-8898 MBER OF ATTORNEY
at 1511 West Beverly Boulevard, Los A LOCATION to permit such party or someone acting tangible things in your possession, cu This Subpoena Duces Tecum is issued.  Sean Patrick Roche/ Cameron McEvo NAME OF ATTORNEY  4100 Monument Corner Drive, Suite Office Address Fairfax, Virginia 22030	ngeles, CA 90026  ng in his or her behalf ustody or control.  ed by the attorney for a Defendant Amber Laur PARTY NAME y, PLLC	to inspect and copy, and on behalf of a Heard  7 VIRGINIA ST. 703-2 TELEPHONE NU 703-2	1412 ATE BAR NUMBER 273-8898 MHER OF ATTORNEY 273-8897

RETURN OF SERVICE (see page two of this form)

If you are served with this subpoena less than 14 days prior to the date that compliance with this subpoena is required, you may object by notifying the party who issued the subpoena of your objection in writing and describing the basis of your objection in that writing. This SUBPOENA DUCES TECUM 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: PERSONAL SERVICE Tel. No. ..... Being unable to make 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: Posted on front door or such other door as appear to be the main entrance of usual place of abode, address listed above. (Other authorized recipient not found.) NOT FOUND by_______Deputy Sheriff DATE CERTIFICATE OF COUNSEL Sean Patrick Roche , counsel for Defendant , hereby certify , counsel of record for Plaintiff on the 21st day of August 2019

NOTICE: Upon receipt of the subpoenaed documents, the requesting party must, if requested, provide true and full copies of those documents to any other party or to the attorney for any other party, provided the other party or attorney for the other party pays the reasonable cost of copying or reproducing those documents. This does not apply when the subpoenaed documents are returnable to and maintained by the clerk of the court in which the action is pending. Va. Code § 8.01-417

TO the person summoned:

## SCHEDULE A

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

## DOCUMENTS TO BE PRODUCED UNDER THIS SUBPOENA

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  eDoc_Create_DATE, eDoc_Create_TIME, eDoc_Mod_DATE, and eDoc_Mod_TIME, for Daily
  Production Reports from the set of Pirates of the Caribbean: Dead Man Tell No Tales from
  March 24, 2016 through April 13, 2016.

Cameron McEvoy

Sean Patrick Roche

Attorney at Law **Direct:** (703) 460-9343

oche@cameronmcevoy.com

2019 AUG 23 🗩 3: 02

August 23, 2019 T. FREY
FAIRFAX, VA

## VIA HAND DELIVERY

Clerk of Court Fairfax County Circuit Court 4110 Chain Bridge Road Fairfax, VA 22030

Re:

John C. Depp, II v. Amber Laura Heard

Fairfax County Circuit Court Case No. CL2019-0002911

Dear Clerk:

I have enclosed for filing two copies of Defendant's Certificate of Counsel and corresponding subpoenas issued under the Uniform Interstate Depositions and Discovery Acts of Virginia (Va. Code § 8.01-412.8, et seq.) and California (Cal. Civ. Proc. Code § 2029.100, et seq.) (collectively "Acts"). The subpoenas have been issued in accordance with both Acts and the reciprocal privileges included therein for the issuance and service of the following subpoenas:

- 1. Amended Subpoena for Production of Business Records in Action Pending Outside California; and Amended Subpoena Duces Tecum (Civil) Attorney Issued FilmLA;
- 2. Amended Subpoena for Production of Business Records in Action Pending Outside California; and Amended Subpoena Duces Tecum (Civil) Attorney Issued Jerry Bruckheimer Films; and
- 3. Amended Subpoena for Production of Business Records in Action Pending Outside California; and Amended Subpoena Duces Tecum (Civil) Attorney Issued Walt Disney Pictures.

The enclosed documents will be served by private process server and affidavits of service filed as necessary. Please place the enclosed documents under this case file and return the file-stamped copy of the Certificate to me via the waiting courier.

Thank you in advance for your assistance and please do not hesitate to contact me with any questions or if I can be of any help.

August 23, 2019 Page 2

Very truly yours,

Sean Patrick Roche

Enclosures (as stated):