

VIRGINIA:

IN THE CIRCUIT COURT OF FAIRFAX COUNTY

JOHN C. DEPP, II,

Plaintiff,

v.

AMBER LAURA HEARD,

Defendant.

Civil Action No.: CL-2019-0002911

**CONSENT ORDER RESPECTING PLAINTIFF'S RESPONSES TO
FOURTH, FIFTH, SIXTH AND SEVENTH REQUEST FOR DOCUMENTS**

Plaintiff John C. Depp, II, and Defendant Amber Laura Heard, by counsel, having engaged in extensive meet and confers respecting Defendant's Fourth, Fifth, Sixth and Seventh Requests for Production and Plaintiff having consented to an Order respecting certain of these discovery requests, as evidenced by their signatures below, it is hereby:

ORDERED that Plaintiff shall produce all non-privileged documents and for any claimed privileges, will produce a privilege log simultaneous with the production of the other recording, responsive to the following Requests:

Fourth Requests for Production of Documents (served July 2, 2020):

- Nos. 1-2;
- Nos. 4-5;
- Nos. 7-9;
- No. 10 (revised to "All documents between or among Mr. Depp and Christi Dembrowski, Ben King, Kevin Murphy, Jerry Judge, Nathan Holmes, Malcolm Connelly, Steven Deuters, any other security for Mr. Depp, house personnel, housekeeping, and personal assistant staff, that refer or relate to Mr. Depp's substance or alcohol abuse or treatment, Mr. Depp's acts of physical violence, Mr. Depp's destruction of property, Ms. Heard's 2016 Domestic Violence Restraining Order, evidence or testimony related thereto, allegations of physical or nonphysical abuse by Ms. Heard or Mr.

9/16/2020
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no

Depp, allegations that these are false, part of a hoax or fraud, and/or that otherwise refer or relate to the claims, counterclaims, defenses or allegations in this lawsuit during the following date periods: January 1 - March 30, 2013; June 27-July 7, 2013; May 1-May 31, 2014; August 1-September 15, 2014; December 1, 2014-January 3, 2015; January 20 - February 12, 2015; March 1- March 30, 2015; July 15-August 5, 2015; November 20, 2015-December 31, 2015; April 15, 2016-April 30, 2016; May 3, 2016-May 21, 2016; May 22, 2016 through the present; and

- Nos. 11-13 and 15.

Fifth Requests for Production of Documents (served July 10, 2020):

- No. 2;
- No. 3 (revised to “All communications with the owner of the Australian house, Mick Doohan, from the period September 1, 2014 through September 1, 2017 that refer or relate to Mr. Depp’s substance or alcohol use, Mr. Depp’s acts of physical violence, Mr. Depp’s destruction of property, Mr. Depp’s finger injury, Mr. Doohan’s documentary, and/or otherwise refer or relate to the claims, counterclaims, defenses or allegations in this lawsuit”);
- Nos. 4-9, 11;
- and
- No. 16.

Sixth Requests for Production of Documents (served July 17, 2020):

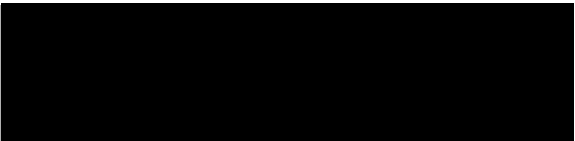
- No. 7;
- No. 11;
- Nos. 13-22.

Seventh Requests for Production of Documents (served July 24, 2020):

- Nos. 2, 4, 8 and 10.

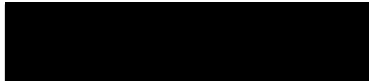
It is further **ORDERED** that all such responsive documents shall be produced no later than Wednesday, September 30, 2020.

Date: 9/14/20



The Honorable Bruce D. White
Chief Judge, Fairfax County Circuit Court

WE ASK FOR THIS:



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