

VIRGINIA:

IN THE CIRCUIT COURT OF FAIRFAX COUNTY

JOHN C. DEPP, II,
Plaintiff and Counter-defendant,

v.

AMBER LAURA HEARD,
Defendant and Counter-plaintiff.

Case No.: CL-2019-0002911

JOHN J. FREY
CLERK, SUPREME COURT
FAIRFAX, VA

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**DEFENDANT AMBER LAURA HEARD'S MEMORANDUM IN OPPOSITION TO
PLAINTIFF'S MOTION TO COMPEL DEFENDANT AMBER LAURA HEARD'S
FURTHER RESPONSES WITHOUT OBJECTIONS AND PRODUCTION OF
DOCUMENTS IN RESPONSE TO FOURTH REQUESTS FOR PRODUCTION**

April 23, 2021

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Plaintiff Amber Laura Heard*

Mr. Depp's Motion to Compel was initially filed on February 12, 2021 and was removed because of reassignment of this case. Then, while the parties were meeting and conferring to update and try to resolve the outstanding issues, Mr. Depp quickly re-filed the same brief, apparently concerned about losing its April 30 slot (which counsel for Ms. Heard made clear would be respected).¹ Since the filing of the initial Motion to Compel (which was unchanged in refiling), the Court ruled on the Demurrer and Plea in Bar to Ms. Heard's Counterclaim, narrowing the claims and damages. Ms. Heard has since produced over 1 million responsive documents supporting her damages, and a 50-page Expert Designation detailing her damages.² Also since February 12, Ms. Heard has produced multiple sets of additional documents responsive to these Requests. Ms. Heard even agreed to provide the bates numbers for her productions as part of a meet and confer in Supplemental pleadings and produced those in a 92-page supplemental pleading. **Att. 1.** Ms. Heard fully intends to adhere to the Court's duty to supplement, which is explicitly included in the Scheduling Order entered by this Court on April 22, 2021.

As is clear from the Supplemental responses, Ms. Heard has produced a significant number of documents responsive to the Requests, even to many where the Court has previously ruled the requests as not relevant, overbroad or not discoverable for other reasons. Part of the discovery

¹ In early April, Mr. Depp exhausted his appeals in his UK libel proceeding, and the decision that Mr. Depp was a "wife beater" and had committed domestic violence against Ms. Heard at least 12 times, causing her to fear for her life, became final. As a result, Ms. Heard has filed amended pleadings and is requesting leave to amend, set a hearing on recognizing and applying the UK decision to this case, and to stay discovery pending that ruling. Ms. Heard sought counsel for Mr. Depp's consent to set those motions on April 30 in light of the significance but indicated she would respect Mr. Depp's right to go first. **Att. 2.** Mr. Depp immediately refiled the Motion to Compel, setting it down for April 30, 2021.

² Ms. Heard's expert collected over a million pages of social media documents reflecting the damages, which were produced in a hard drive to counsel for Mr. Depp. The expert was identified in the Expert Disclosures and provided an explanation for the data.

produced in this case are ALL the exhibits from the UK trial, and Ms. Heard has produced, in addition to the social media data, well over 16,000 pages of documents.

For those limited number of document requests Ms. Heard has not provided documents, most are moot because of the Court's rulings narrowing the Counterclaims, or were already ruled upon in earlier discovery motions as irrelevant, overbroad, and unduly burdensome, and based on Mr. Depp's counsel's prior in-court statements, Mr. Depp agrees. Because Mr. Depp did not update the motion to reflect the many rulings and productions between the two filings, and Ms. Heard has since complied with the request for supplementation with bates numbers it is believed these are fully resolved. Out of an abundance of caution, Ms. Heard will try to address general issues, and will be prepared to respond to any specifics at the hearing, if the motion is not withdrawn.

ARGUMENT

I. **Mr. Depp's Requests Attempt to Circumvent and Re-Litigate this Court's Prior Rulings (RFP Nos. 6 – 10, 15, 34, and 36 – 42)**

Documents "Reflecting the Impact" of Matters on Ms. Heard's Career: Mr. Depp's requests are vague, overbroad, and unduly burdensome as they seek documents "reflecting the impact" on Ms. Heard's career from: her relationship with Mr. Depp (Request 5), the Divorce (Request 6),³ the UK Action (Request 7),⁴ allegations of abuse against Mr. Depp (Request 8), "any and all" public statements of Mr. Depp and Mr. Waldman (Requests 9-10), and the divorce settlement donations (Request 37). This Court already ruled that seeking documents revealing the

³ The Court repeatedly denied divorce discovery because "enough is enough... We're not going to retry that divorce in this case" Att. 3, 9/18/20 Tr., at 35:9-13; Att. 4, Tr. 12/18/20, at 26:9-10 ("we're not going to relitigate the divorce.").

⁴ The Court repeatedly denied UK Action discovery, including documents "sufficient to reflect the impact" of the UK litigation on Mr. Depp's "reputation and career" being overly broad and vague. Att. 5, at 30:2-6; Att. 4, at 26:1-3 (denying communications relating to the UK Action).

“impact” of matters was overly broad, unduly burdensome, and vague on November 20, 2020. **Att. 5**, Tr. 11/20/20, at 30:2-6. At the same hearing and in written Opposition, Counsel for Mr. Depp agreed that almost identical Requests were “extremely vague,” “highly ambiguous,” and “not entirely clear” because “[t]here is no file of documents which...impact litigation on Mr. Depp’s career.” *Id.* at 17:21-18:7; **Att. 6**, at 3-4.

Charitable Donation Documents: Requests 37-42 again seek overbroad, unduly burdensome, and irrelevant documents that the Court has already ruled were outside of the scope of discovery, including those related to “any and all publicity” and “impact...on your reputation and career” arising from the divorce and charitable donations (Requests 37-38) communications relating to anonymous charitable donations (Requests 39-41), and the amount of the divorce settlement donated to charity (Request 42). The Court previously denied nearly identical Requests seeking charity discovery based on Mr. Depp’s own allegations and deposition testimony.⁵

Other Discovery the Court Previously Denied: The Court already denied Mr. Depp’s previous Requests for communications with *anyone* relating to “claims of abuse or violence involving Mr. Depp” as overbroad. **Att. 4**, at 26:4-7; **Att. 8**, No. 43. But Request 36 contains identical language and again seeks all communications with *anyone* regarding “allegations of violence or abuse.” Likewise, Request 15 seeks communications with *anyone* relating to the “Domestic Violence Restraining Order.” Request 34 then seeks a breathtakingly overbroad array of documents related to the UK Action, all claims and defenses in this case, and all public statements made by Mr. Depp or Mr. Waldman. *Id.* Mr. Depp also seeks all communications

⁵ Mr. Depp never alleged that Ms. Heard claimed domestic abuse to obtain money, only to advance her career. *Compl.*, ¶¶ 3, 64-68. Mr. Depp also testified that “[n]one of the \$7 million that she was awarded in the divorce had anything whatsoever to do with any-any of her claims, any of that, no.” **Att. 7**, 11/10/20 Tr. Depos. Of Depp, at 70:20-71:6, 74:6-9.

between Ms. Heard and her partner Bianca Butti regarding “allegations of violence or abuse against Mr. Depp,” despite the Court previously denying a nearly identical request. Att. 4, at 26:4-7; Att. 8, Request 42 (“All communications between You and Bianca Butti that refer or relate to...any claims of abuse or violence involving Mr. Depp”).

II. Ms. Heard of Refusing to Produce Documents Related to the Op-Ed and Has Already Agreed to a Partial Waiver (RFP Nos. 18-19)

Mr. Depp seeks all drafts of Ms. Heard’s op-ed, and all documents and communications “regarding” it. Requests 18-19. Mr. Depp’s assertion that Ms. Heard “only agreed to produce only drafts of the op-ed, but no communications or other documents” is incorrect. Ms. Heard produced at least 784 pages of responsive documents, including drafts of the op-ed, communications with the ACLU, and communications with her counsel at the time, so the Motion to Compel is moot and should be denied. *See* Att. 1, at 47- 49 (ALH 10654-874, 16281-845).

It is unclear if the Motion seeks documents beyond the limited waiver of privilege for advice of counsel on the Op-Ed. However, in September of 2019, counsel for Mr. Depp agreed to a limited waiver. Att. 9. This is also supported by the law. *United States v. Dallman*, 433 F. Supp. 3d 804, 813 (E.D. Va. Jan. 15, 2020 (Ellis, J.) (noting that “the advice-of-counsel defense warrants a limited waiver of the attorney-client privilege with respect to the communications or documents relied on to assert the defense, which must be “circumscribed to protect the attorney-client privilege in other respects”). Since there is no waiver “with respect to issues and subjects beyond the information” relevant to the specific legal advice at issue, Ms. Heard has met her production burden for her reliance on counsel defense. *Id.* at 814. Moreover, the Court previously denied Mr. Depp’s attempts to compel production of communications between Ms. Heard and unlimited universes of people—as he now does in Request 19—including documents relating to certain topics and subjects. Att. 4, at 26:1-3.

III. Mr. Depp's Requests Related to the Counterclaims are Irrelevant, Exceedingly Overbroad, and Unduly Burdensome (RFP Nos. 2-4, 9, 11, 13, 16-17 and 20-33)

Mr. Depp seeks irrelevant documents relating to liability on the dismissed Counterclaim allegations. Requests 16, 20, 22, 24, 26. Mr. Depp further seeks documents relating to Mr. Waldman's April and June 2020 statements that survived the Plea in Bar. Requests 28, 30, 32; *Counterclaim*, Exs. F-H. But Ms. Heard produced documents responsive to these requests, so the Motion to Compel is moot regarding this request.

Mr. Depp further seeks documents relating to Ms. Heard's damages for the surviving statements. Requests 29, 31, 33. But Mr. Depp also seeks overbroad, unduly burdensome, and irrelevant damages discovery for a period of *over ten years*, including all documents reflecting *any* entertainment or commercial project that Ms. Heard was rejected for (Request 2), all actual or "anticipated" compensation and contracts for *any* projects (Requests 3-4), the "impact" of all public statements by Mr. Waldman on her reputation and career (Request 9), damages caused by "any and all" public statements by Mr. Depp or Mr. Waldman (Request 11), and damages caused by Mr. Depp's false and defamatory smear campaign (Request 13). *Id.* Even Mr. Depp argued very similar Requests were "hopelessly...overbroad," and cited the Court's tax-return ruling in a previous Motion to defend the scope of his own production was sufficient. **Att. 5**, at 13:16-14:22, 18:8-19:6. Ms. Heard has already produced the relevant and discoverable portions of her tax returns, along with relevant contracts. ALH10429-486. Mr. Depp therefore possesses the very discovery he moves to compel, and agrees with Ms. Heard's objections and scope of production.

WHEREFORE, for the foregoing reasons, Ms. Heard respectfully requests that the Motion to Compel be denied, that the Court enter sanctions against Mr. Depp for having to defend this motion, and that the Court grant Ms. Heard such other and further relief as may be just and proper.

April 23 , 2021



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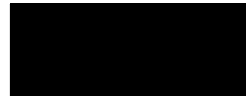
CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing was served this 23rd day of April, 2021, by email, by agreement of the parties, addressed as follows:

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ATTACHMENT 1

VIRGINIA:

IN THE CIRCUIT COURT OF FAIRFAX COUNTY

JOHN C. DEPP, II,

Plaintiff and Counterclaim Defendant,

v.

Civil Action No.: CL-2019-0002911

AMBER LAURA HEARD,

Defendant and Counterclaim Plaintiff.

**DEFENDANT AND COUNTERCLAIM PLAINTIFF AMBER LAURA
HEARD'S SUPPLEMENTAL RESPONSES AND OBJECTIONS TO
PLAINTIFF AND COUNTERCLAIM DEFENDANT'S
FOURTH SET OF REQUESTS FOR PRODUCTION**

Pursuant to Rule 4:9 of the Rules of the Supreme Court of Virginia ("Rules"), Defendant and Counterclaim Plaintiff Amber Laura Heard, by and through her attorneys, submits these supplemental responses and objections (the "Responses") to Plaintiff and Counterclaim Defendant John C. Depp's Fourth Set of Requests for Production dated December 29, 2020 (the "Requests").

GENERAL OBJECTIONS

The following general objections and responses (the "General Objections") are incorporated into each specific objection and response (the "Specific Objections") as if fully set forth therein:

1. Defendant and Counterclaim Plaintiff objects to the Requests to the extent they are duplicative, cumulative, or seek information that has already been provided through other means of discovery. Defendant and Counterclaim Plaintiff will not reproduce documents already produced in discovery.

2. Defendant and Counterclaim Plaintiff objects to the Requests to the extent they are vague, ambiguous, overly broad, unduly burdensome, seek information not relevant to the claims or defenses of any party, or are not proportional to the needs of the case.

3. Defendant and Counterclaim Plaintiff objects to the Requests to the extent they impose any obligations or requirements beyond the scope of the Rules or any case law interpreting them.

4. Defendant and Counterclaim Plaintiff's Responses are not intended to be and shall not be construed as an agreement or concurrence that all information provided is admissible with respect to Plaintiff's claims and/or Counterclaim Defendant's defenses.

5. Defendant and Counterclaim Plaintiff objects to each Request to the extent that it calls for information that: (a) may be derived or ascertained from documents that have been or will be produced in this action; (b) is already in Plaintiff and Counterclaim Defendant's possession, custody, or control; (c) is publicly available; or (d) is otherwise independently available to Plaintiff and Counterclaim Defendant or his counsel.

6. Defendant and Counterclaim Plaintiff objects to the Requests to the extent they purport to call for documents or information that: (a) are subject to the attorney-client privilege; (b) constitute attorney work product; (c) are protected from disclosure based on common interest or a similar privilege; or (d) are otherwise protected from disclosure under applicable privilege, law, or rule. Defendant and Counterclaim Plaintiff will not produce such information in response to the Requests, and any inadvertent production thereof shall not be deemed a waiver of any privilege with respect to such information.

7. Defendant and Counterclaim Plaintiff objects to the Requests to the extent they require unreasonable measures to locate and produce responsive information or documents.

Defendant and Counterclaim Plaintiff will construe the requests to require a reasonable and diligent search of its reasonably-accessible files where it would reasonably expect to find information, documents, or things related to the requests.

8. Defendant and Counterclaim Plaintiff objects to the Requests to the extent they seek information that is not within Defendant and Counterclaim Plaintiff's possession, custody, or control. Subject to this General Objection, in responding to the Requests, Defendant and Counterclaim Plaintiff will provide only responsive information within Defendant and Counterclaim Plaintiff's possession, custody, or control.

9. Defendant and Counterclaim Plaintiff objects to the Definitions and Instructions to the extent they seek to impose obligations greater than those imposed by the Rules or any other applicable law, rule, ruling of this court or agreement of the parties.

10. Defendant and Counterclaim Plaintiff objects to the Requests to the extent they are based on a false premise and contain express or implied assumptions of fact or law with respect to matters at issue in this case. Defendant and Counterclaim Plaintiff's Responses to the Requests are not intended to be and shall not be construed as an agreement or concurrence with Plaintiff and Counterclaim Defendant's characterization of any facts, circumstances, or legal obligations. Defendant and Counterclaim Plaintiff reserves the right to contest any such characterization as inaccurate.

11. Defendant and Counterclaim Plaintiff expressly reserves all rights and privileges under the Rules and any other applicable law or rule. The failure to assert such rights and privileges or the inadvertent disclosure by Defendant and Counterclaim Plaintiff of information or documents protected by such rights or privileges shall not constitute a waiver

thereof, either with respect to these Responses or with respect to any future discovery objections or responses.

12. Defendant and Counterclaim Plaintiff's Responses to the Requests are made to the best of her present knowledge, information, and belief. These Responses are at all times subject to such additional or different information that discovery or further investigation may disclose and, while based on the present state of Defendant and Counterclaim Plaintiff's knowledge and investigation, are subject to such additional knowledge of facts as may result from Defendant and Counterclaim Plaintiff's further discovery or investigation.

OBJECTIONS TO DEFINITIONS

1. Defendant and Counterclaim Plaintiff objects to Definition's No. 3 on the grounds that it is overly broad, unduly burdensome, and seeks information not reasonably calculated to lead to the discovery of admissible evidence regarding the claims and defenses in this case, taking into account the needs of the case, the amount in controversy, limitations on the parties' resources, and the importance of the discovery in resolving the issues to the extent it seeks documents beyond Va. Sup. Ct. R. 4:9(a). Since a "Communication" is a form of a "Document," Defendant and Counterclaim Plaintiff will interpret the word "Communication" in accordance with the definition included in Va. Sup. Ct. R. 4:9(a).

2. Defendant and Counterclaim Plaintiff objects to Definition No. 5 on the grounds that it is overly broad, unduly burdensome, and seeks information not reasonably calculated to lead to the discovery of admissible evidence regarding the claims and defenses in this case, taking into account the needs of the case, the amount in controversy, limitations on the parties' resources, and the importance of the discovery in resolving the issues to the extent it

seeks documents beyond Va. Sup. Ct. R. 4:9(a). Defendant and Counterclaim Plaintiff will interpret the word "Document" in accordance with the definition included in Va. Sup. Ct. R. 4:9(a).

3. Defendant and Counterclaim Plaintiff objects to Definition No. 11 as vague, ambiguous, and failing to define with particularity the information that it seeks as it defines words in a circular confusing manner, and is therefore unduly burdensome.

4. Defendant and Counterclaim Plaintiff objects to Definition No. 12 as vague, ambiguous, and failing to define with particularity the information that it seeks.

OBJECTIONS TO INSTRUCTIONS

1. Defendant and Counterclaim Plaintiff objects to Instruction No. 1 to the extent it exceeds the requirements of Va. Sup. Ct. R. 4:9(a), which only requires the production of documents "which are in the possession, custody, or control of the party upon whom the request is served," and is therefore overly broad, unduly burdensome, and seeks information not reasonably calculated to lead to the discovery of admissible evidence regarding the claims and defenses in this case. Defendant and Counterclaim Plaintiff will produce documents in accordance with Va. Sup. Ct. R. 4:9(a).

2. Defendant and Counterclaim Plaintiff objects to the portion of Instruction No. 3 seeking "The date such additional documents came into your possession shall be specified, as well as the identity of the individuals who furnished such additional documents to the person preparing the response" because it exceeds the requirements of Va. Sup. Ct. R 4:9, and is therefore overly broad, unduly burdensome, and seeks information not reasonably

calculated to lead to the discovery of admissible evidence regarding the claims and defenses in this case.

3. Defendant and Counterclaim Plaintiff objects to Instruction No. 4 because the request to “specify the reason(s) for your inability to respond to the remainder and stating whether information or knowledge you have concerning the portion to which you do not respond” exceeds the requirements of Va. Sup. Ct. R 4:9, and is therefore overly broad, unduly burdensome, and seeks information not reasonably calculated to lead to the discovery of admissible evidence regarding the claims and defenses in this case.

4. Defendant and Counterclaim Plaintiff objects to Instruction No. 5(b) and (c) because the requests to identify each document in the manner requested and to “provide a description of the subject matter of each document or item” exceed the requirements of Va. Sup. Ct. R 4:9, and are therefore overly broad, unduly burdensome, and seek information not reasonably calculated to lead to the discovery of admissible evidence regarding the claims and defenses in this case.

5. Defendant and Counterclaim Plaintiff objects to Instruction No. 6 as unduly burdensome because the Plaintiff and Counterclaim Defendant has an ongoing duty under Va. Sup. Ct. R. 4:1(e) to supplement document production and responses when and where necessary, and this instruction is therefore overly broad and unduly burdensome.

6. Defendant and Counterclaim Plaintiff objects to Instruction No. 7 because it seeks documents and information protected by the attorney-client privilege, and on the grounds that this Request invades protected litigation work product and would require disclosure of core opinion work product and mental impression of counsel, which is prohibited by 4:1(b)(3) of the Rules of the Virginia Supreme Court.

7. Defendant and Counterclaim Plaintiff objects to Instruction No. 8 because it exceeds the requirements of Va. Sup. Ct. R 4:9, and is therefore overly broad, unduly burdensome, and seeks information not reasonably calculated to lead to the discovery of admissible evidence regarding the claims and defenses in this case.

8. Defendant and Counterclaim Plaintiff objects to Instruction No. 9 on the grounds that it exceeds the requirements of Va. Sup. Ct. R 4:9, and is therefore overly broad, unduly burdensome, and seeks information not reasonably calculated to lead to the discovery of admissible evidence regarding the claims and defenses in this case. Defendant and Counterclaim Plaintiff will produce documents as they are kept in the usual course of business pursuant to Va. Sup. Ct. R. 4:9(b)(iii)(A).

9. Defendant and Counterclaim Plaintiff objects to Instruction No. 10 seeking “transmittal sheets and cover letters” on the grounds that such documents are overly broad, unduly burdensome, and seeks information not reasonably calculated to lead to the discovery of admissible evidence regarding the claims and defenses in this case. Defendant and Counterclaim Plaintiff further objects because this Instruction seeks information protected by the attorney-client privilege, and on the grounds that this Request invades protected litigation work product and would require disclosure of core opinion work product and mental impression of counsel, which is prohibited by 4:1(b)(3) of the Rules of the Virginia Supreme Court.

10. Defendant and Counterclaim Plaintiff objects to Instruction No. 11 on the grounds that it exceeds the requirements of Va. Sup. Ct. R 4:9, and is therefore overly broad, unduly burdensome, and seeks information not reasonably calculated to lead to the discovery of admissible evidence regarding the claims and defenses in this case. Defendant

and Counterclaim Plaintiff will produce documents as they are kept in the usual course of business pursuant to Va. Sup. Ct. R. 4:9(b)(iii)(A).

11. Defendant and Counterclaim Plaintiff objects to Instruction No. 12 on the grounds that it exceeds the requirements of Va. Sup. Ct. R 4:9, and is therefore overly broad, unduly burdensome, and seeks information not reasonably calculated to lead to the discovery of admissible evidence regarding the claims and defenses in this case. Defendant and Counterclaim Plaintiff will produce documents as they are kept in the usual course of business pursuant to Va. Sup. Ct. R. 4:9(b)(iii)(A). The Instruction is also ambiguous because it contradicts Instruction No. 9.

12. Defendant and Counterclaim Plaintiff objects to Instruction Nos. 13 and 14 on the grounds that they exceed the requirements of Va. Sup. Ct. R 4:9 and 4:1(b)(6), and are therefore overly broad, unduly burdensome, and seeks information not reasonably calculated to lead to the discovery of admissible evidence regarding the claims and defenses in this case.

13. Defendant and Counterclaim Plaintiff objects to Instruction No. 15 because it seeks information protected by the attorney-client privilege, and on the grounds that this Request invades protected litigation work product and would require disclosure of core opinion work product and mental impression of counsel, which is prohibited by 4:1(b)(3) of the Rules of the Virginia Supreme Court.

14. Defendant and Counterclaim Plaintiff objects to Instruction No. 16 on the grounds that it exceeds the requirements of Va. Sup. Ct. R 4:9, and is therefore overly broad, unduly burdensome, and seeks information not reasonably calculated to lead to the discovery of admissible evidence regarding the claims and defenses in this case. Defendant

and Counterclaim Plaintiff will produce documents as they are kept in the usual course of business pursuant to Va. Sup. Ct. R. 4:9(b)(iii)(A). The Instruction is also cumulative and duplicative of earlier Instructions.

15. Defendant and Counterclaim Plaintiff objects to Instruction No. 17 as unduly burdensome by seeking to later “expand” these already-served Requests for Production of Documents.

REQUESTS FOR PRODUCTION

1. **Portions of Your state and federal tax returns from 2010 to present, sufficient to reflect Your gross income in each year from 2010 to present.**

OBJECTION: Defendant and Counterclaim Plaintiff objects to this Request seeking financial information on the grounds that it is vague, ambiguous, and fails to define with particularity the information that it seeks, and is overly broad, unduly burdensome, harassing, and seeks information not reasonably calculated to lead to the discovery of admissible evidence regarding the claims and defenses in this case, taking into account the needs of the case, the amount in controversy, limitations on the parties’ resources, the importance of the discovery in resolving the issues, and critically the Court’s prior rulings defining the scope of relevant discovery in this case quoted in detail below.

On July 24, 2020 the Court ruled that Request No. 14 of Ms. Heard’s 2nd Request for Documents seeking “income from all sources from 2010 to the present” was overbroad because “those types of things aren’t anything that would be helpful in this case,” along with ruling that discovery seeking “outflow, what his expenses are and whether he spends more money than he makes” was overbroad and beyond the scope of relevant discovery in this case. The Court also ruled that Request 16 of Ms. Heard’s 2nd Request for Documents seeking all transactions from

January 1, 2010 to the present with a list of individuals was “overly broad” and beyond the scope of discovery in this case unless these individuals were “going to be potential witnesses” in the case.

On September 18, 2020 the Court ruled that Request Nos. 1-6 and 8 of Ms. Heard’s 7th Requests for Documents and Request Nos. 1, 3, 5, and 7 of Ms. Heard’s 7th Requests seeking financial related documents during the parties’ marriage and related to the divorce case was overbroad and beyond the scope of relevant discovery in this case because “its denied under the doctrine of enough is enough. You all have been through the divorce already. We’re not going to retry that divorce in this case.”

Also on September 18, 2020 the Court specifically defined the narrow scope of relevant tax-return discovery in this case as only requiring “the documents which show the gross income...The supporting documents are not to be produced,” and further Ordered that only “the amount of income” from the tax returns is relevant and that only involved “limited parts of [the tax return] that would show the income.” The Court reiterated this scope of tax-return discovery on November 20 when it further ruled that only the “return pages” of tax returns needed to be produced, and “the supplementary documents that are attached to” the returns were beyond the scope of relevant discovery in this case. Any other tax-related documents are therefore beyond the scope of relevant discovery in this case.

On November 20, 2020 the Court also ruled that Requests 1-5 of Ms. Heard’s 8th Requests for Documents seeking deposition transcripts, pleadings, discovery responses, and document production from four other specific litigations regarding disputes over Mr. Depp’s finances were “overly broad [and] burdensome” and beyond the scope of discovery in this case.

Defendant and Counterclaim Plaintiff further objects to the timeframe of this Request of 2010 to the present as overly broad, unduly burdensome, harassing, and seeks information not reasonably calculated to lead to the discovery of admissible evidence regarding the claims and defenses in this case, taking into account the needs of the case, the amount in controversy, limitations on the parties' resources, the importance of the discovery in resolving the issues, and critically the Court's prior rulings defining the scope of relevant discovery in this case.

RESPONSE: Subject to and without waiving the objections, Defendant and Counterclaim Plaintiff will produce non-privileged documents in response to this Request.

SUPPLEMENTAL RESPONSE: Subject to and without waiving objections, and consistent with Chief Judge White's September 18, 2020 Order respecting Mr. Depp's tax returns, Defendant and Counterclaim Plaintiff has produced Federal Tax Returns for Ms. Heard personally, and also for her corporation (which was not requested or ordered) for the years 2013-present. Please see bates numbers ALH_00010429-449. Ms. Heard does not possess the earlier tax returns and does not believe they are relevant, since her damages permitted are from April 2020 forward.

- 2. All Documents and Communications that evidence or reflect any film, movie, television, commercial, or other project from 2010 to present for which You were considered and rejected.**

OBJECTION: Defendant and Counterclaim Plaintiff objects to this Request seeking financial information on the grounds that it is vague, ambiguous, and fails to define with particularity the information that it seeks, and is overly broad, unduly burdensome, harassing, and seeks information not reasonably calculated to lead to the discovery of admissible evidence regarding the claims and defenses in this case, taking into account the needs of the case, the amount in controversy, limitations on the parties' resources, the importance of the discovery in

resolving the issues, and critically the Court's prior rulings defining the scope of relevant discovery in this case quoted in detail below.

On July 24, 2020 the Court ruled that Request No. 14 of Ms. Heard's 2nd Request for Documents seeking "income from all sources from 2010 to the present" was overbroad because "those types of things aren't anything that would be helpful in this case," along with ruling that discovery seeking "outflow, what his expenses are and whether he spends more money than he makes" was overbroad and beyond the scope of relevant discovery in this case. The Court also ruled that Request 16 of Ms. Heard's 2nd Request for Documents seeking all transactions from January 1, 2010 to the present with a list of individuals was "overly broad" and beyond the scope of discovery in this case unless these individuals were "going to be potential witnesses" in the case.

On September 18, 2020 the Court ruled that Request Nos. 1-6 and 8 of Ms. Heard's 7th Requests for Documents and Request Nos. 1, 3, 5, and 7 of Ms. Heard's 7th Requests seeking financial related documents during the parties' marriage and related to the divorce case was overbroad and beyond the scope of relevant discovery in this case because "its denied under the doctrine of enough is enough. You all have been through the divorce already. We're not going to retry that divorce in this case."

Also on September 18, 2020 the Court specifically defined the narrow scope of relevant tax-return discovery in this case as only requiring "the documents which show the gross income...The supporting documents are not to be produced," and further Ordered that only "the amount of income" from the tax returns is relevant and that only involved "limited parts of [the tax return] that would show the income." The Court reiterated this scope of tax-return discovery on November 20 when it further ruled that only the "return pages" of tax returns needed to be

produced, and “the supplementary documents that are attached to” the returns were beyond the scope of relevant discovery in this case. Any other tax-related documents are therefore beyond the scope of relevant discovery in this case.

Defendant and Counterclaim Plaintiff further objects to the timeframe of this Request of 2010 to the present as overly broad, unduly burdensome, harassing, and seeks information not reasonably calculated to lead to the discovery of admissible evidence regarding the claims and defenses in this case, taking into account the needs of the case, the amount in controversy, limitations on the parties’ resources, the importance of the discovery in resolving the issues, and critically the Court’s prior rulings defining the scope of relevant discovery in this case. Ms. Heard’s damages sought are from April 2020 onward.

Defendant and Counterclaim Plaintiff further objects to this Request because it seeks information protected by the attorney-client privilege, and on the grounds that this Request invades protected litigation work product and would require disclosure of core opinion work product and mental impression of counsel, which is prohibited by 4:1(b)(3) of the Rules of the Virginia Supreme Court. Plaintiff and Counterclaim Defendant has not made the requisite showing under the Rules.

RESPONSE: Subject to and without waiving the objections, Defendant and Counterclaim Plaintiff has produced or will produce non-privileged documents in response to this Request from April 8, 2020.

SUPPLEMENTAL RESPONSE: Subject to and without waiving objections, Defendant and Counterclaim Plaintiff has produced the following documents responsive to this request: ALH_00010450-485. Please also see Ms. Heard’s Expert Witness Designation, dated February 16, 2021. Other produced documents may also be responsive.

3. Documents sufficient to show Your total actual and/or anticipated compensation for each film, television, commercial, or other project with which You have been professionally involved from 2010 to present.

OBJECTION: Defendant and Counterclaim Plaintiff objects to this Request seeking financial information on the grounds that it is vague, ambiguous, and fails to define with particularity the information that it seeks, and is overly broad, unduly burdensome, harassing, and seeks information not reasonably calculated to lead to the discovery of admissible evidence regarding the claims and defenses in this case, taking into account the needs of the case, the amount in controversy, limitations on the parties' resources, the importance of the discovery in resolving the issues, and critically the Court's prior rulings defining the scope of relevant discovery in this case quoted in detail below.

On July 24, 2020 the Court ruled that Request No. 14 of Ms. Heard's 2nd Request for Documents seeking "income from all sources from 2010 to the present" was overbroad because "those types of things aren't anything that would be helpful in this case," along with ruling that discovery seeking "outflow, what his expenses are and whether he spends more money than he makes" was overbroad and beyond the scope of relevant discovery in this case. The Court also ruled that Request 16 of Ms. Heard's 2nd Request for Documents seeking all transactions from January 1, 2010 to the present with a list of individuals was "overly broad" and beyond the scope of discovery in this case unless these individuals were "going to be potential witnesses" in the case.

On September 18, 2020 the Court ruled that Request Nos. 1-6 and 8 of Ms. Heard's 7th Requests for Documents and Request Nos. 1, 3, 5, and 7 of Ms. Heard's 7th Requests seeking financial related documents during the parties' marriage and related to the divorce case was overbroad and beyond the scope of relevant discovery in this case because "its denied under the

doctrine of enough is enough. You all have been through the divorce already. We're not going to retry that divorce in this case."

Also on September 18, 2020 the Court specifically defined the narrow scope of relevant tax-return discovery in this case as only requiring "the documents which show the gross income...The supporting documents are not to be produced," and further Ordered that only "the amount of income" from the tax returns is relevant and that only involved "limited parts of [the tax return] that would show the income." The Court reiterated this scope of tax-return discovery on November 20 when it further ruled that only the "return pages" of tax returns needed to be produced, and "the supplementary documents that are attached to" the returns were beyond the scope of relevant discovery in this case. Any other tax-related documents are therefore beyond the scope of relevant discovery in this case.

On November 20, 2020 the Court also ruled that Requests 1-5 of Ms. Heard's 8th Requests for Documents seeking deposition transcripts, pleadings, discovery responses, and document production from four other specific litigations regarding disputes over Mr. Depp's finances were "overly broad [and] burdensome" and beyond the scope of discovery in this case.

Defendant and Counterclaim Plaintiff further objects to the timeframe of this Request of 2010 to the present as overly broad, unduly burdensome, harassing, and seeks information not reasonably calculated to lead to the discovery of admissible evidence regarding the claims and defenses in this case, taking into account the needs of the case, the amount in controversy, limitations on the parties' resources, the importance of the discovery in resolving the issues, and critically the Court's prior rulings defining the scope of relevant discovery in this case. Ms. Heard seeks damages only from April 2020 onward.

Defendant and Counterclaim Plaintiff further objects to this Request because it seeks information protected by the attorney-client privilege, and on the grounds that this Request invades protected litigation work product and would require disclosure of core opinion work product and mental impression of counsel, which is prohibited by 4:1(b)(3) of the Rules of the Virginia Supreme Court. Plaintiff and Counterclaim Defendant has not made the requisite showing under the Rules.

RESPONSE: Subject to and without waiving the objections, please refer to the Defendant and Counterclaim Plaintiff's response and document production to Request No. 1 of these 4th Requests for Production of Documents. Defendant and Counterclaim Plaintiff otherwise stands on her objections to this Request.

SUPPLEMENTAL RESPONSE: Subject to and without waiving objections, Defendant and Counterclaim Plaintiff has produced the following documents responsive to this request: ALH_00010450-485. Please also see Ms. Heard's Expert Witness Designation, dated February 16, 2021. Other produced documents may also be responsive.

4. All contracts that memorialize Your professional involvement in any film, television, commercial, or other project from 2010 to present.

OBJECTION: Defendant and Counterclaim Plaintiff objects to this Request seeking financial information, including seeking documents "relating to" it, on the grounds that it is vague, ambiguous, and fails to define with particularity the information that it seeks, and is overly broad, unduly burdensome, harassing, and seeks information not reasonably calculated to lead to the discovery of admissible evidence regarding the claims and defenses in this case, taking into account the needs of the case, the amount in controversy, limitations on the parties'

resources, the importance of the discovery in resolving the issues, and critically the Court's prior rulings defining the scope of relevant discovery in this case quoted in detail below.

On July 24, 2020 the Court ruled that Request No. 14 of Ms. Heard's 2nd Request for Documents seeking "income from all sources from 2010 to the present" was overbroad because "those types of things aren't anything that would be helpful in this case," along with ruling that discovery seeking "outflow, what his expenses are and whether he spends more money than he makes" was overbroad and beyond the scope of relevant discovery in this case. The Court also ruled that Request 16 of Ms. Heard's 2nd Request for Documents seeking all transactions from January 1, 2010 to the present with a list of individuals was "overly broad" and beyond the scope of discovery in this case unless these individuals were "going to be potential witnesses" in the case.

On September 18, 2020 the Court ruled that Request Nos. 1-6 and 8 of Ms. Heard's 7th Requests for Documents and Request Nos. 1, 3, 5, and 7 of Ms. Heard's 7th Requests seeking financial related documents during the parties' marriage and related to the divorce case was overbroad and beyond the scope of relevant discovery in this case because "its denied under the doctrine of enough is enough. You all have been through the divorce already. We're not going to retry that divorce in this case."

Also on September 18, 2020 the Court specifically defined the narrow scope of relevant tax-return discovery in this case as only requiring "the documents which show the gross income...The supporting documents are not to be produced," and further Ordered that only "the amount of income" from the tax returns is relevant and that only involved "limited parts of [the tax return] that would show the income." The Court reiterated this scope of tax-return discovery on November 20 when it further ruled that only the "return pages" of tax returns needed to be

produced, and “the supplementary documents that are attached to” the returns were beyond the scope of relevant discovery in this case. Any other tax-related documents are therefore beyond the scope of relevant discovery in this case.

Defendant and Counterclaim Plaintiff further objects to the timeframe of this Request of 2010 to the present as overly broad, unduly burdensome, harassing, and seeks information not reasonably calculated to lead to the discovery of admissible evidence regarding the claims and defenses in this case, taking into account the needs of the case, the amount in controversy, limitations on the parties’ resources, the importance of the discovery in resolving the issues, and critically the Court’s prior rulings defining the scope of relevant discovery in this case.

Defendant and Counterclaim Plaintiff further objects to this Request because it seeks information protected by the attorney-client privilege, and on the grounds that this Request invades protected litigation work product and would require disclosure of core opinion work product and mental impression of counsel, which is prohibited by 4:1(b)(3) of the Rules of the Virginia Supreme Court. Plaintiff and Counterclaim Defendant has not made the requisite showing under the Rules.

RESPONSE: Subject to and without waiving the objections, Defendant and Counterclaim Plaintiff stands on her objections to this Request.

SUPPLEMENTAL RESPONSE: Subject to and without waiving objections, Defendant and Counterclaim Plaintiff has produced the following documents responsive to this request: ALH_00010450-485. Please also see Ms. Heard’s Expert Witness Designation, dated February 16, 2021. Other produced documents may also be responsive.

5. All Documents and Communications that evidence or reflect the impact of Your relationship with Mr. Depp on Your reputation and/or career.

OBJECTION: Defendant and Counterclaim Plaintiff objects to this Request on the grounds that it is vague, ambiguous, and fails to define with particularity the information that it seeks, and is overly broad, unduly burdensome, harassing, and seeks information not reasonably calculated to lead to the discovery of admissible evidence regarding the claims and defenses in this case, taking into account the needs of the case, the amount in controversy, limitations on the parties' resources, the importance of the discovery in resolving the issues, and critically the Court's prior rulings defining the scope of relevant discovery in this case quoted in detail below.

On November 20, 2020 the Court ruled that Request No. 6 of Ms. Heard's 8th Document Requests seeking documents revealing the impact of other litigation on Mr. Depp's "reputation and career" as overly broad, burdensome, and unreasonably vague, and therefore holding that the subject was beyond the scope of discovery in this case.

Defendant and Counterclaim Plaintiff further objects to this Request seeking documents evidencing or reflecting "your relationship with Mr. Depp" on the grounds that it is vague, ambiguous, and fails to define with particularity the information that it seeks, and is overly broad, unduly burdensome, harassing, and seeks information not reasonably calculated to lead to the discovery of admissible evidence regarding the claims and defenses in this case, taking into account the needs of the case, the amount in controversy, limitations on the parties' resources, the importance of the discovery in resolving the issues, and critically the Court's prior rulings defining the scope of relevant discovery in this case quoted in detail below.

On December 18, 2020, the Court ruled that Request 51 of Mr. Depp's 3rd Requests for Documents seeking all communications between Ms. Heard and anyone relating to her relationship with Mr. Depp, claims of abuse or violence involving Mr. Depp, and injuries Ms. Heard contends she suffered as a result of Mr. Depp's conduct was overbroad, and therefore

beyond the scope of discovery in this case. The Court also ruled that Request 52 of Mr. Depp's 3rd Requests for Documents seeking all documents and communications relating to Ms. Heard's "relationship with Mr. Depp" was also overbroad, and therefore beyond the scope of discovery in this case.

Defendant and Counterclaim Plaintiff further objects to this Request because it seeks information protected by the attorney-client privilege, and on the grounds that this Request invades protected litigation work product and would require disclosure of core opinion work product and mental impression of counsel, which is prohibited by 4:1(b)(3) of the Rules of the Virginia Supreme Court. Plaintiff and Counterclaim Defendant has not made the requisite showing under the Rules.

RESPONSE: Subject to and without waiving the objections, Defendant and Counterclaim Plaintiff stands on her objections to this Request.

SUPPLEMENTAL RESPONSE: Subject to and without waiving objections, Defendant and Counterclaim Plaintiff does not believe there are any documents responsive to this Request, as phrased.

6. All Documents and Communications that evidence or reflect the impact of the Divorce Action on Your reputation and/or career.

OBJECTION: Defendant and Counterclaim Plaintiff objects to this Request seeking financial information on the grounds that it is vague, ambiguous, and fails to define with particularity the information that it seeks, and is overly broad, unduly burdensome, harassing, and seeks information not reasonably calculated to lead to the discovery of admissible evidence regarding the claims and defenses in this case, taking into account the needs of the case, the amount in controversy, limitations on the parties' resources, the importance of the discovery in

resolving the issues, and critically the Court's prior rulings defining the scope of relevant discovery in this case quoted in detail below.

On July 24, 2020 the Court ruled that Request No. 14 of Ms. Heard's 2nd Request for Documents seeking "income from all sources from 2010 to the present" was overbroad because "those types of things aren't anything that would be helpful in this case," along with ruling that discovery seeking "outflow, what his expenses are and whether he spends more money than he makes" was overbroad and beyond the scope of relevant discovery in this case. The Court also ruled that Request 16 of Ms. Heard's 2nd Request for Documents seeking all transactions from January 1, 2010 to the present with a list of individuals was "overly broad" and beyond the scope of discovery in this case unless these individuals were "going to be potential witnesses" in the case.

On September 18, 2020 the Court ruled that Request Nos. 1-6 and 8 of Ms. Heard's 7th Requests for Documents and Request Nos. 1, 3, 5, and 7 of Ms. Heard's 7th Requests seeking financial related documents during the parties' marriage and related to the divorce case was overbroad and beyond the scope of relevant discovery in this case because "its denied under the doctrine of enough is enough. You all have been through the divorce already. We're not going to retry that divorce in this case."

Also on September 18, 2020 the Court specifically defined the narrow scope of relevant tax-return discovery in this case as only requiring "the documents which show the gross income...The supporting documents are not to be produced," and further Ordered that only "the amount of income" from the tax returns is relevant and that only involved "limited parts of [the tax return] that would show the income." The Court reiterated this scope of tax-return discovery on November 20 when it further ruled that only the "return pages" of tax returns needed to be

produced, and “the supplementary documents that are attached to” the returns were beyond the scope of relevant discovery in this case. Any other tax-related documents are therefore beyond the scope of relevant discovery in this case.

Defendant and Counterclaim Plaintiff further objects to this Request because it seeks information protected by the attorney-client privilege, and on the grounds that this Request invades protected litigation work product and would require disclosure of core opinion work product and mental impression of counsel, which is prohibited by 4:1(b)(3) of the Rules of the Virginia Supreme Court. Plaintiff and Counterclaim Defendant has not made the requisite showing under the Rules.

RESPONSE: Subject to and without waiving the objections, Defendant and Counterclaim Plaintiff stands on her objections to this Request.

SUPPLEMENTAL RESPONSE: Subject to and without waiving objections, Defendant and Counterclaim Plaintiff has produced the following documents responsive that may be responsive to this request: ALH10393-428. Other produced documents may also be responsive. Based on the phrasing of this Request, it is difficult to ascertain which documents may be responsive.

7. All Documents and Communications that evidence or reflect the impact of the U.K. Action on Your reputation and/or career.

OBJECTION: Defendant and Counterclaim Plaintiff objects to this Request on the grounds that it is vague, ambiguous, and fails to define with particularity the information that it seeks, and is overly broad, unduly burdensome, harassing, and seeks information not reasonably calculated to lead to the discovery of admissible evidence regarding the claims and defenses in this case, taking into account the needs of the case, the amount in controversy, limitations on the parties' resources, the importance of the discovery in resolving the issues, and critically the Court's prior rulings defining the scope of relevant discovery in this case quoted in detail below.

On November 20, 2020 the Court ruled that discovery seeking documents "sufficient to reflect the impact" of the UK litigation "on Mr. Depp's reputation and career" was overly broad, unduly burdensome, and unreasonably vague, and therefore beyond the scope of discovery in this case.

On December 18, 2020 the Court ruled that Request No. 23 of Mr. Depp's 1st Requests for Document and Request 50 of Mr. Depp's 3rd Requests for Documents seeking all documents and communications between Ms. Heard and The Sun/NGN was overbroad, and therefore beyond the scope of relevant discovery in this case. The Court also ruled that Request No. 51 of Mr. Depp's 3rd Requests for Documents seeking all documents and communications relating to the UK Action was also overbroad, and therefore beyond the scope of relevant discovery in this case.

Defendant and Counterclaim Plaintiff further objects to this Request to the extent it seeks financial information, including seeking documents "relating to" it, on the grounds that it is vague, ambiguous, and fails to define with particularity the information that it seeks, and is

overly broad, unduly burdensome, harassing, and seeks information not reasonably calculated to lead to the discovery of admissible evidence regarding the claims and defenses in this case, taking into account the needs of the case, the amount in controversy, limitations on the parties' resources, the importance of the discovery in resolving the issues, and critically the Court's prior rulings defining the scope of relevant discovery in this case quoted in detail below.

On July 24, 2020 the Court ruled that Request No. 14 of Ms. Heard's 2nd Request for Documents seeking "income from all sources from 2010 to the present" was overbroad because "those types of things aren't anything that would be helpful in this case," along with ruling that discovery seeking "outflow, what his expenses are and whether he spends more money than he makes" was overbroad and beyond the scope of relevant discovery in this case. The Court also ruled that Request 16 of Ms. Heard's 2nd Request for Documents seeking all transactions from January 1, 2010 to the present with a list of individuals was "overly broad" and beyond the scope of discovery in this case unless these individuals were "going to be potential witnesses" in the case.

On September 18, 2020 the Court ruled that Request Nos. 1-6 and 8 of Ms. Heard's 7th Requests for Documents and Request Nos. 1, 3, 5, and 7 of Ms. Heard's 7th Requests seeking financial related documents during the parties' marriage and related to the divorce case was overbroad and beyond the scope of relevant discovery in this case because "its denied under the doctrine of enough is enough. You all have been through the divorce already. We're not going to retry that divorce in this case."

Also on September 18, 2020 the Court specifically defined the narrow scope of relevant tax-return discovery in this case as only requiring "the documents which show the gross income...The supporting documents are not to be produced," and further Ordered that only "the

amount of income” from the tax returns is relevant and that only involved “limited parts of [the tax return] that would show the income.” The Court reiterated this scope of tax-return discovery on November 20 when it further ruled that only the “return pages” of tax returns needed to be produced, and “the supplementary documents that are attached to” the returns were beyond the scope of relevant discovery in this case. Any other tax-related documents are therefore beyond the scope of relevant discovery in this case.

Defendant and Counterclaim Plaintiff further objects to this Request because it seeks information protected by the attorney-client privilege, and on the grounds that this Request invades protected litigation work product and would require disclosure of core opinion work product and mental impression of counsel, which is prohibited by 4:1(b)(3) of the Rules of the Virginia Supreme Court. Plaintiff and Counterclaim Defendant has not made the requisite showing under the Rules.

RESPONSE: Subject to and without waiving the objections, Defendant and Counterclaim Plaintiff stands on her objections to this Request.

SUPPLEMENTAL RESPONSE: Subject to and without waiving objections, Defendant and Counterclaim Plaintiff is unaware of any responsive documents to the request as phrased.

8. All Documents and Communications that evidence or reflect the impact of Your allegations of abuse against Mr. Depp on Your reputation and/or career.

OBJECTION: Defendant and Counterclaim Plaintiff objects to this Request on the grounds that it is vague, ambiguous, and fails to define with particularity the information that it seeks, and is overly broad, unduly burdensome, harassing, and seeks information not reasonably calculated to lead to the discovery of admissible evidence regarding the claims and defenses in

this case, taking into account the needs of the case, the amount in controversy, limitations on the parties' resources, the importance of the discovery in resolving the issues, and critically the Court's prior rulings defining the scope of relevant discovery in this case quoted in detail below.

On November 20, 2020 the Court ruled that Request No. 6 of Ms. Heard's 8th Document Requests seeking documents revealing the impact of other litigation on Mr. Depp's "reputation and career" as overly broad, burdensome, and unreasonably vague, and therefore holding that the subject was beyond the scope of discovery in this case.

Defendant and Counterclaim Plaintiff further objects to this Request to the extent it seeks financial information, including seeking documents "relating to" it, on the grounds that it is vague, ambiguous, and fails to define with particularity the information that it seeks, and is overly broad, unduly burdensome, harassing, and seeks information not reasonably calculated to lead to the discovery of admissible evidence regarding the claims and defenses in this case, taking into account the needs of the case, the amount in controversy, limitations on the parties' resources, the importance of the discovery in resolving the issues, and critically the Court's prior rulings defining the scope of relevant discovery in this case quoted in detail below.

On July 24, 2020 the Court ruled that Request No. 14 of Ms. Heard's 2nd Request for Documents seeking "income from all sources from 2010 to the present" was overbroad because "those types of things aren't anything that would be helpful in this case," along with ruling that discovery seeking "outflow, what his expenses are and whether he spends more money than he makes" was overbroad and beyond the scope of relevant discovery in this case. The Court also ruled that Request 16 of Ms. Heard's 2nd Request for Documents seeking all transactions from January 1, 2010 to the present with a list of individuals was "overly broad" and beyond the scope

of discovery in this case unless these individuals were “going to be potential witnesses” in the case.

On September 18, 2020 the Court ruled that Request Nos. 1-6 and 8 of Ms. Heard’s 7th Requests for Documents and Request Nos. 1, 3, 5, and 7 of Ms. Heard’s 7th Requests seeking financial related documents during the parties’ marriage and related to the divorce case was overbroad and beyond the scope of relevant discovery in this case because “its denied under the doctrine of enough is enough. You all have been through the divorce already. We’re not going to retry that divorce in this case.”

Also on September 18, 2020 the Court specifically defined the narrow scope of relevant tax-return discovery in this case as only requiring “the documents which show the gross income...The supporting documents are not to be produced,” and further Ordered that only “the amount of income” from the tax returns is relevant and that only involved “limited parts of [the tax return] that would show the income.” The Court reiterated this scope of tax-return discovery on November 20 when it further ruled that only the “return pages” of tax returns needed to be produced, and “the supplementary documents that are attached to” the returns were beyond the scope of relevant discovery in this case. Any other tax-related documents are therefore beyond the scope of relevant discovery in this case.

Defendant and Counterclaim Plaintiff further objects to this Request because it seeks information protected by the attorney-client privilege, and on the grounds that this Request invades protected litigation work product and would require disclosure of core opinion work product and mental impression of counsel, which is prohibited by 4:1(b)(3) of the Rules of the Virginia Supreme Court. Plaintiff and Counterclaim Defendant has not made the requisite showing under the Rules.

RESPONSE: Subject to and without waiving the objections, Defendant and Counterclaim Plaintiff stands on her objections to this Request.

SUPPLEMENTAL RESPONSE: Subject to and without waiving objections, Defendant and Counterclaim Plaintiff is unaware of any responsive documents to the Request as phrased.

9. All Documents and Communications that evidence or reflect the impact of any and all public statements by Adam Waldman on Your reputation and/or career.

OBJECTION: Defendant and Counterclaim Plaintiff objects to this Request on the grounds that it is vague, ambiguous, and fails to define with particularity the information that it seeks, and is overly broad, unduly burdensome, harassing, and seeks information not reasonably calculated to lead to the discovery of admissible evidence regarding the claims and defenses in this case, taking into account the needs of the case, the amount in controversy, limitations on the parties' resources, the importance of the discovery in resolving the issues, and critically the Court's prior rulings defining the scope of relevant discovery in this case quoted in detail below.

On November 20, 2020 the Court ruled that Request No. 6 of Ms. Heard's 8th Document Requests seeking documents revealing the impact of other litigation on Mr. Depp's "reputation and career" as overly broad, burdensome, and unreasonably vague, and therefore holding that the subject was beyond the scope of discovery in this case.

Defendant and Counterclaim Plaintiff further objects to this Request to the extent it seeks financial information, including seeking documents "relating to" it, on the grounds that it is vague, ambiguous, and fails to define with particularity the information that it seeks, and is overly broad, unduly burdensome, harassing, and seeks information not reasonably calculated to lead to the discovery of admissible evidence regarding the claims and defenses in this case,

taking into account the needs of the case, the amount in controversy, limitations on the parties' resources, the importance of the discovery in resolving the issues, and critically the Court's prior rulings defining the scope of relevant discovery in this case quoted in detail below.

On July 24, 2020 the Court ruled that Request No. 14 of Ms. Heard's 2nd Request for Documents seeking "income from all sources from 2010 to the present" was overbroad because "those types of things aren't anything that would be helpful in this case," along with ruling that discovery seeking "outflow, what his expenses are and whether he spends more money than he makes" was overbroad and beyond the scope of relevant discovery in this case. The Court also ruled that Request 16 of Ms. Heard's 2nd Request for Documents seeking all transactions from January 1, 2010 to the present with a list of individuals was "overly broad" and beyond the scope of discovery in this case unless these individuals were "going to be potential witnesses" in the case.

On September 18, 2020 the Court ruled that Request Nos. 1-6 and 8 of Ms. Heard's 7th Requests for Documents and Request Nos. 1, 3, 5, and 7 of Ms. Heard's 7th Requests seeking financial related documents during the parties' marriage and related to the divorce case was overbroad and beyond the scope of relevant discovery in this case because "its denied under the doctrine of enough is enough. You all have been through the divorce already. We're not going to retry that divorce in this case."

Also on September 18, 2020 the Court specifically defined the narrow scope of relevant tax-return discovery in this case as only requiring "the documents which show the gross income...The supporting documents are not to be produced," and further Ordered that only "the amount of income" from the tax returns is relevant and that only involved "limited parts of [the tax return] that would show the income." The Court reiterated this scope of tax-return discovery

on November 20 when it further ruled that only the “return pages” of tax returns needed to be produced, and “the supplementary documents that are attached to” the returns were beyond the scope of relevant discovery in this case. Any other tax-related documents are therefore beyond the scope of relevant discovery in this case.

Defendant and Counterclaim Plaintiff further objects to this Request as overly broad, unduly burdensome, and seeking information not reasonably calculated to lead to the discovery of admissible evidence regarding the claims and defenses in this case, based on the Court’s January 4, 2021 ruling on the *demurrer* and plea in bar dismissing certain allegations from the Counterclaim.

Defendant and Counterclaim Plaintiff further objects to this Request because it seeks information protected by the attorney-client privilege, and on the grounds that this Request invades protected litigation work product and would require disclosure of core opinion work product and mental impression of counsel, which is prohibited by 4:1(b)(3) of the Rules of the Virginia Supreme Court. Plaintiff and Counterclaim Defendant has not made the requisite showing under the Rules.

RESPONSE: Subject to and without waiving the objections, Defendant and Counterclaim Plaintiff has produced or will produce non-privileged documents in response to this Request relevant to the statements at issue.

SUPPLEMENTAL RESPONSE: Subject to and without waiving objections, Defendant and Counterclaim Plaintiff is claiming damages for the statements set forth in the Counterclaim upheld by the Court on Demurrer and has produced the following documents responsive to this request: ALH10393-428. Please also see Ms. Heard’s Expert Witness Designation, dated February 16, 2021. Other produced documents may also be responsive.

10. All Documents and Communications that evidence or reflect the impact of any and all public statements by Mr. Depp on Your reputation and/or career.

OBJECTION: Defendant and Counterclaim Plaintiff objects to this Request on the grounds that it is vague, ambiguous, and fails to define with particularity the information that it seeks, and is overly broad, unduly burdensome, harassing, and seeks information not reasonably calculated to lead to the discovery of admissible evidence regarding the claims and defenses in this case, taking into account the needs of the case, the amount in controversy, limitations on the parties' resources, the importance of the discovery in resolving the issues, and critically the Court's prior rulings defining the scope of relevant discovery in this case quoted in detail below.

On November 20, 2020 the Court ruled that Request No. 6 of Ms. Heard's 8th Document Requests seeking documents revealing the impact of other litigation on Mr. Depp's "reputation and career" as overly broad, burdensome, and unreasonably vague, and therefore holding that the subject was beyond the scope of discovery in this case.

Defendant and Counterclaim Plaintiff further objects to this Request to the extent it seeks financial information, including seeking documents "relating to" it, on the grounds that it is vague, ambiguous, and fails to define with particularity the information that it seeks, and is overly broad, unduly burdensome, harassing, and seeks information not reasonably calculated to lead to the discovery of admissible evidence regarding the claims and defenses in this case, taking into account the needs of the case, the amount in controversy, limitations on the parties' resources, the importance of the discovery in resolving the issues, and critically the Court's prior rulings defining the scope of relevant discovery in this case quoted in detail below.

On July 24, 2020 the Court ruled that Request No. 14 of Ms. Heard's 2nd Request for Documents seeking "income from all sources from 2010 to the present" was overbroad because

“those types of things aren’t anything that would be helpful in this case,” along with ruling that discovery seeking “outflow, what his expenses are and whether he spends more money than he makes” was overbroad and beyond the scope of relevant discovery in this case. The Court also ruled that Request 16 of Ms. Heard’s 2nd Request for Documents seeking all transactions from January 1, 2010 to the present with a list of individuals was “overly broad” and beyond the scope of discovery in this case unless these individuals were “going to be potential witnesses” in the case.

On September 18, 2020 the Court ruled that Request Nos. 1-6 and 8 of Ms. Heard’s 7th Requests for Documents and Request Nos. 1, 3, 5, and 7 of Ms. Heard’s 7th Requests seeking financial related documents during the parties’ marriage and related to the divorce case was overbroad and beyond the scope of relevant discovery in this case because “its denied under the doctrine of enough is enough. You all have been through the divorce already. We’re not going to retry that divorce in this case.”

Also on September 18, 2020 the Court specifically defined the narrow scope of relevant tax-return discovery in this case as only requiring “the documents which show the gross income... The supporting documents are not to be produced,” and further Ordered that only “the amount of income” from the tax returns is relevant and that only involved “limited parts of [the tax return] that would show the income.” The Court reiterated this scope of tax-return discovery on November 20 when it further ruled that only the “return pages” of tax returns needed to be produced, and “the supplementary documents that are attached to” the returns were beyond the scope of relevant discovery in this case. Any other tax-related documents are therefore beyond the scope of relevant discovery in this case.

Defendant and Counterclaim Plaintiff further objects to this Request as overly broad, unduly burdensome, and seeking information not reasonably calculated to lead to the discovery of admissible evidence regarding the claims and defenses in this case, based on the Court's January 4, 2021 ruling on the *demurrer* and plea in bar dismissing certain allegations from the Counterclaim.

Defendant and Counterclaim Plaintiff further objects to this Request because it seeks information protected by the attorney-client privilege, and on the grounds that this Request invades protected litigation work product and would require disclosure of core opinion work product and mental impression of counsel, which is prohibited by 4:1(b)(3) of the Rules of the Virginia Supreme Court. Plaintiff and Counterclaim Defendant has not made the requisite showing under the Rules.

RESPONSE: Subject to and without waiving the objections, Defendant and Counterclaim Plaintiff stands on her objections to this Request.

SUPPLEMENTAL RESPONSE: Subject to and without waiving objections, Defendant and Counterclaim Plaintiff has claimed damages for the statements set forth in the Counterclaim, upheld by the Court on Demurrer, and has produced the following documents responsive to this request: ALH10393-428. Please also see Ms. Heard's Expert Witness Designation, dated February 16, 2021. Other produced documents may also be responsive.

11. All Documents and Communications that refer, reflect, or relate to any contention that You have suffered damages as a result of any alleged statement by Mr. Depp or Adam Waldman.

OBJECTION: Defendant and Counterclaim Plaintiff objects to this Request, including seeking documents "relating to" it, on the grounds that it is vague, ambiguous, and fails to define with particularity the information that it seeks, and is overly broad, unduly burdensome,

harassing, and seeks information not reasonably calculated to lead to the discovery of admissible evidence regarding the claims and defenses in this case, taking into account the needs of the case, the amount in controversy, limitations on the parties' resources, the importance of the discovery in resolving the issues, and critically the Court's prior rulings defining the scope of relevant discovery in this case quoted in detail below.

On November 20, 2020 the Court ruled that Request No. 6 of Ms. Heard's 8th Document Requests seeking documents revealing the impact of other litigation on Mr. Depp's "reputation and career" as overly broad, burdensome, and unreasonably vague, and therefore holding that the subject was beyond the scope of discovery in this case.

Defendant and Counterclaim Plaintiff further objects to this Request to the extent it seeks financial information, including seeking documents "relating to" it, on the grounds that it is vague, ambiguous, and fails to define with particularity the information that it seeks, and is overly broad, unduly burdensome, harassing, and seeks information not reasonably calculated to lead to the discovery of admissible evidence regarding the claims and defenses in this case, taking into account the needs of the case, the amount in controversy, limitations on the parties' resources, the importance of the discovery in resolving the issues, and critically the Court's prior rulings defining the scope of relevant discovery in this case quoted in detail below.

On July 24, 2020 the Court ruled that Request No. 14 of Ms. Heard's 2nd Request for Documents seeking "income from all sources from 2010 to the present" was overbroad because "those types of things aren't anything that would be helpful in this case," along with ruling that discovery seeking "outflow, what his expenses are and whether he spends more money than he makes" was overbroad and beyond the scope of relevant discovery in this case. The Court also ruled that Request 16 of Ms. Heard's 2nd Request for Documents seeking all transactions from

January 1, 2010 to the present with a list of individuals was “overly broad” and beyond the scope of discovery in this case unless these individuals were “going to be potential witnesses” in the case.

On September 18, 2020 the Court ruled that Request Nos. 1-6 and 8 of Ms. Heard’s 7th Requests for Documents and Request Nos. 1, 3, 5, and 7 of Ms. Heard’s 7th Requests seeking financial related documents during the parties’ marriage and related to the divorce case was overbroad and beyond the scope of relevant discovery in this case because “its denied under the doctrine of enough is enough. You all have been through the divorce already. We’re not going to retry that divorce in this case.”

Also on September 18, 2020 the Court specifically defined the narrow scope of relevant tax-return discovery in this case as only requiring “the documents which show the gross income...The supporting documents are not to be produced,” and further Ordered that only “the amount of income” from the tax returns is relevant and that only involved “limited parts of [the tax return] that would show the income.” The Court reiterated this scope of tax-return discovery on November 20 when it further ruled that only the “return pages” of tax returns needed to be produced, and “the supplementary documents that are attached to” the returns were beyond the scope of relevant discovery in this case. Any other tax-related documents are therefore beyond the scope of relevant discovery in this case.

Defendant and Counterclaim Plaintiff further objects to this Request as overly broad, unduly burdensome, and seeking information not reasonably calculated to lead to the discovery of admissible evidence regarding the claims and defenses in this case, based on the Court’s January 4, 2021 ruling on the *demurrer* and plea in bar dismissing certain allegations from the Counterclaim.

Defendant and Counterclaim Plaintiff further objects to this Request because it seeks information protected by the attorney-client privilege, and on the grounds that this Request invades protected litigation work product and would require disclosure of core opinion work product and mental impression of counsel, which is prohibited by 4:1(b)(3) of the Rules of the Virginia Supreme Court. Plaintiff and Counterclaim Defendant has not made the requisite showing under the Rules.

RESPONSE: Subject to and without waiving the objections, Defendant and Counterclaim Plaintiff has produced or will produce non-privileged documents in response to this Request relevant to the statements at issue.

SUPPLEMENTAL RESPONSE: Subject to and without waiving objections, Defendant and Counterclaim Plaintiff has claimed damages for the statements set forth in the Counterclaim, upheld by the Court on Demurrer, and has produced the following documents responsive to this request: ALH10393-428. Please also see Ms. Heard's Expert Witness Designation, dated February 16, 2021. Other produced documents may also be responsive.

12. All Documents and Communications that support or otherwise relate to Your allegation in paragraph 1 of Your Counterclaim in the above-captioned action that "Mr. Depp and/or his agents acting on his behalf have orchestrated a false and defamatory smear campaign against Ms. Heard.

OBJECTION: Defendant and Counterclaim Plaintiff objects to this Request seeking documents "otherwise relating to" allegations in the Counterclaim on the grounds that it is vague, ambiguous, and fails to define with particularity the information that it seeks, and is overly broad, unduly burdensome, harassing, and seeks information not reasonably calculated to lead to the discovery of admissible evidence regarding the claims and defenses in this case, taking into account the needs of the case, the amount in controversy, limitations on the parties'

resources, the importance of the discovery in resolving the issues, and critically the Court's prior rulings defining the scope of relevant discovery in this case quoted in detail below.

On December 18, 2020, the Court ruled that Request 51 of Mr. Depp's 3rd Requests for Documents seeking all communications between Ms. Heard and anyone relating to her relationship with Mr. Depp, claims of abuse or violence involving Mr. Depp, and injuries Ms. Heard contends she suffered as a result of Mr. Depp's conduct was overbroad, and therefore beyond the scope of discovery in this case. The Court also ruled that Request 52 of Mr. Depp's 3rd Requests for Documents seeking all documents and communications relating to Ms. Heard's "relationship with Mr. Depp" was also overbroad, and therefore beyond the scope of discovery in this case.

Defendant and Counterclaim Plaintiff further objects to this Request as overly broad, unduly burdensome, and seeking information not reasonably calculated to lead to the discovery of admissible evidence regarding the claims and defenses in this case, based on the Court's January 4, 2021 ruling on the *demurrer* and plea in bar dismissing certain allegations from the Counterclaim.

Defendant and Counterclaim Plaintiff further objects to this Request because it seeks information protected by the attorney-client privilege, and on the grounds that this Request invades protected litigation work product and would require disclosure of core opinion work product and mental impression of counsel, which is prohibited by 4:1(b)(3) of the Rules of the Virginia Supreme Court. Plaintiff and Counterclaim Defendant has not made the requisite showing under the Rules.

RESPONSE: Subject to and without waiving the objections, Defendant and Counterclaim Plaintiff has produced or will produce non-privileged documents in response to this Request relevant to the statements at issue.

SUPPLEMENTAL RESPONSE: Subject to and without waiving objections, Defendant and Counterclaim Plaintiff set out the specifics of these allegations in her Counterclaim and attached Exhibits. In addition, Ms. Heard has produced the following documents which may be responsive to this request: ALH10393-428. Please also see Ms. Heard's Expert Witness Designation, dated February 16, 2021. Other produced documents may also be responsive.

13. All Documents and Communications that support or otherwise relate to any contention that You have suffered damages in any form as a result of the "false and defamatory smear campaign" alleged in Your Counterclaim in the above-captioned action at paragraph 1.

OBJECTION: Defendant and Counterclaim Plaintiff objects to this Request seeking financial information, including seeking documents "otherwise relating to" it, on the grounds that it is vague, ambiguous, and fails to define with particularity the information that it seeks, and is overly broad, unduly burdensome, harassing, and seeks information not reasonably calculated to lead to the discovery of admissible evidence regarding the claims and defenses in this case, taking into account the needs of the case, the amount in controversy, limitations on the parties' resources, the importance of the discovery in resolving the issues, and critically the Court's prior rulings defining the scope of relevant discovery in this case quoted in detail below.

On July 24, 2020 the Court ruled that Request No. 14 of Ms. Heard's 2nd Request for Documents seeking "income from all sources from 2010 to the present" was overbroad because "those types of things aren't anything that would be helpful in this case," along with ruling that

discovery seeking “outflow, what his expenses are and whether he spends more money than he makes” was overbroad and beyond the scope of relevant discovery in this case. The Court also ruled that Request 16 of Ms. Heard’s 2nd Request for Documents seeking all transactions from January 1, 2010 to the present with a list of individuals was “overly broad” and beyond the scope of discovery in this case unless these individuals were “going to be potential witnesses” in the case.

On September 18, 2020 the Court ruled that Request Nos. 1-6 and 8 of Ms. Heard’s 7th Requests for Documents and Request Nos. 1, 3, 5, and 7 of Ms. Heard’s 7th Requests seeking financial related documents during the parties’ marriage and related to the divorce case was overbroad and beyond the scope of relevant discovery in this case because “its denied under the doctrine of enough is enough. You all have been through the divorce already. We’re not going to retry that divorce in this case.”

Also on September 18, 2020 the Court specifically defined the narrow scope of relevant tax-return discovery in this case as only requiring “the documents which show the gross income...The supporting documents are not to be produced,” and further Ordered that only “the amount of income” from the tax returns is relevant and that only involved “limited parts of [the tax return] that would show the income.” The Court reiterated this scope of tax-return discovery on November 20 when it further ruled that only the “return pages” of tax returns needed to be produced, and “the supplementary documents that are attached to” the returns were beyond the scope of relevant discovery in this case. Any other tax-related documents are therefore beyond the scope of relevant discovery in this case.

Defendant and Counterclaim Plaintiff further objects to this Request as overly broad, unduly burdensome, and seeking information not reasonably calculated to lead to the discovery

of admissible evidence regarding the claims and defenses in this case, based on the Court's January 4, 2021 ruling on the *demurrer* and plea in bar dismissing certain allegations from the Counterclaim.

Defendant and Counterclaim Plaintiff further objects to this Request because it seeks information protected by the attorney-client privilege, and on the grounds that this Request invades protected litigation work product and would require disclosure of core opinion work product and mental impression of counsel, which is prohibited by 4:1(b)(3) of the Rules of the Virginia Supreme Court. Plaintiff and Counterclaim Defendant has not made the requisite showing under the Rule..

RESPONSE: Subject to and without waiving the objections, Defendant and Counterclaim Plaintiff has produced or will produce non-privileged documents in response to this Request relevant to the statements at issue.

SUPPLEMENTAL RESPONSE: Subject to and without waiving objections, Defendant and Counterclaim Plaintiff has claimed damages for the statements set forth in the Counterclaim, upheld by the Court on Demurrer, and has produced the following documents responsive to this request: ALH10393-428. Please also see Ms. Heard's Expert Witness Designation, dated February 16, 2021. Other produced documents may also be responsive.

14. All Documents and Communications that support or otherwise relate to Your allegation in paragraph 8 of Your Counterclaim in the above-captioned action that Mr. Depp and/or his agents "created, coordinated, controlled, and/or manipulated social media accounts created specifically for the purpose of targeting Ms. Heard[.]"

OBJECTION: Defendant and Counterclaim Plaintiff objects to this Request seeking documents "otherwise relating to" allegations in the Counterclaim on the grounds that it is vague, ambiguous, and fails to define with particularity the information that it seeks, and is

overly broad, unduly burdensome, harassing, and seeks information not reasonably calculated to lead to the discovery of admissible evidence regarding the claims and defenses in this case, taking into account the needs of the case, the amount in controversy, limitations on the parties' resources, the importance of the discovery in resolving the issues, and critically the Court's prior rulings defining the scope of relevant discovery in this case quoted in detail below.

On December 18, 2020, the Court ruled that Request 51 of Mr. Depp's 3rd Requests for Documents seeking all communications between Ms. Heard and anyone relating to her relationship with Mr. Depp, claims of abuse or violence involving Mr. Depp, and injuries Ms. Heard contends she suffered as a result of Mr. Depp's conduct was overbroad, and therefore beyond the scope of discovery in this case. The Court also ruled that Request 52 of Mr. Depp's 3rd Requests for Documents seeking all documents and communications relating to Ms. Heard's "relationship with Mr. Depp" was also overbroad, and therefore beyond the scope of discovery in this case.

Defendant and Counterclaim Plaintiff further objects to this Request as overly broad, unduly burdensome, and seeking information not reasonably calculated to lead to the discovery of admissible evidence regarding the claims and defenses in this case, based on the Court's January 4, 2021 ruling on the *demurrer* and plea in bar dismissing certain allegations from the Counterclaim.

Defendant and Counterclaim Plaintiff further objects to this Request because it seeks information protected by the attorney-client privilege, and on the grounds that this Request invades protected litigation work product and would require disclosure of core opinion work product and mental impression of counsel, which is prohibited by 4:1(b)(3) of the Rules of the

Virginia Supreme Court. Plaintiff and Counterclaim Defendant has not made the requisite showing under the Rules.

RESPONSE: Subject to and without waiving the objections, Defendant and Counterclaim Plaintiff has produced or will produce non-privileged documents in response to this Request relevant to the statements at issue.

SUPPLEMENTAL RESPONSE: Subject to and without waiving objections, Defendant and Counterclaim Plaintiff has claimed damages for the statements set forth in the Counterclaim, upheld by the Court on Demurrer, and has produced the following documents responsive to this request: ALH10393-428. Please also see Ms. Heard's Expert Witness Designation, dated February 16, 2021. Other produced documents may also be responsive.

15. All Documents and Communications that refer, reflect, or relate to the "Domestic Violence Restraining Order" referenced in Your Counterclaim at paragraph 24.

OBJECTION: Defendant and Counterclaim Plaintiff objects to this Request, including seeking documents "relating to" it, on the grounds that it is vague, ambiguous, and fails to define with particularity the information that it seeks, and is overly broad, unduly burdensome, harassing, and seeks information not reasonably calculated to lead to the discovery of admissible evidence regarding the claims and defenses in this case, taking into account the needs of the case, the amount in controversy, limitations on the parties' resources, the importance of the discovery in resolving the issues, and critically the Court's prior rulings defining the scope of relevant discovery in this case quoted in detail below.

On September 18, 2020 the Court ruled that Request Nos. 1-6 and 8 of Ms. Heard's 7th Requests for Documents and Request Nos. 1, 3, 5, and 7 of Ms. Heard's 7th Requests seeking financial related documents during the parties' marriage and related to the divorce case was

overbroad and beyond the scope of relevant discovery in this case because “its denied under the doctrine of enough is enough. You all have been through the divorce already. We’re not going to retry that divorce in this case.”

Defendant and Counterclaim Plaintiff further objects to this Request because it seeks information protected by the attorney-client privilege, and on the grounds that this Request invades protected litigation work product and would require disclosure of core opinion work product and mental impression of counsel, which is prohibited by 4:1(b)(3) of the Rules of the Virginia Supreme Court. Plaintiff and Counterclaim Defendant has not made the requisite showing under the Rules.

RESPONSE: Subject to and without waiving the objections, Defendant and Counterclaim Plaintiff stands on her objections to this Request.

SUPPLEMENTAL RESPONSE: Subject to and without waiving the objections, and specifically pursuant to Chief Judge White’s ruling that we are not to relitigate the divorce proceedings, Defendant and Counterclaim Plaintiff stands on her objections. Notwithstanding, all the documents from the UK proceedings have been produced, and many of the documents produced by Ms. Heard are also responsive to this Request.

16. All Documents and Communications that refer, reflect, or relate to the “GQ interview” referenced in Your Counterclaim at paragraphs 33 and 34, and attached as Exhibit A thereto.

OBJECTION: Defendant and Counterclaim Plaintiff objects to this Request seeking documents “relating to” allegations in the Counterclaim on the grounds that it is vague, ambiguous, and fails to define with particularity the information that it seeks, and is overly broad, unduly burdensome, harassing, and seeks information not reasonably calculated to lead to the discovery of admissible evidence regarding the claims and defenses in this case, taking into

account the needs of the case, the amount in controversy, limitations on the parties' resources, the importance of the discovery in resolving the issues, and critically the Court's prior rulings defining the scope of relevant discovery in this case quoted in detail below.

On December 18, 2020, the Court ruled that Request 51 of Mr. Depp's 3rd Requests for Documents seeking all communications between Ms. Heard and anyone relating to her relationship with Mr. Depp, claims of abuse or violence involving Mr. Depp, and injuries Ms. Heard contends she suffered as a result of Mr. Depp's conduct was overbroad, and therefore beyond the scope of discovery in this case. The Court also ruled that Request 52 of Mr. Depp's 3rd Requests for Documents seeking all documents and communications relating to Ms. Heard's "relationship with Mr. Depp" was also overbroad, and therefore beyond the scope of discovery in this case.

Defendant and Counterclaim Plaintiff further objects to this Request as overly broad, unduly burdensome, and seeking information not reasonably calculated to lead to the discovery of admissible evidence regarding the claims and defenses in this case, based on the Court's January 4, 2021 ruling on the *demurrer* and plea in bar dismissing certain allegations from the Counterclaim.

Defendant and Counterclaim Plaintiff further objects to this Request because it seeks information protected by the attorney-client privilege, and on the grounds that this Request invades protected litigation work product and would require disclosure of core opinion work product and mental impression of counsel, which is prohibited by 4:1(b)(3) of the Rules of the Virginia Supreme Court. Plaintiff and Counterclaim Defendant has not made the requisite showing under the Rules.

RESPONSE: Subject to and without waiving the objections, Defendant and Counterclaim Plaintiff has produced or will produce non-privileged documents in response to this Request relevant to the statements at issue.

SUPPLEMENTAL RESPONSE: Defendant and Counterclaim Plaintiff objects to this request as the statement in question has been Ordered dismissed as time-barred, and the request is therefore moot. Notwithstanding, please see UK Trial Bundle F1156-F1171. Other produced documents may also be responsive.

17. All Documents and Communications that support or otherwise relate to any contention that You have suffered monetary or any other damages as a result of the “GQ interview” referenced in Your Counterclaim at paragraphs 33 and 34, and attached as Exhibit A thereto.

OBJECTION: Defendant and Counterclaim Plaintiff objects to this Request seeking financial information, including seeking documents “otherwise relating to” it, on the grounds that it is vague, ambiguous, and fails to define with particularity the information that it seeks, and is overly broad, unduly burdensome, harassing, and seeks information not reasonably calculated to lead to the discovery of admissible evidence regarding the claims and defenses in this case, taking into account the needs of the case, the amount in controversy, limitations on the parties’ resources, the importance of the discovery in resolving the issues, and critically the Court’s prior rulings defining the scope of relevant discovery in this case quoted in detail below.

On July 24, 2020 the Court ruled that Request No. 14 of Ms. Heard’s 2nd Request for Documents seeking “income from all sources from 2010 to the present” was overbroad because “those types of things aren’t anything that would be helpful in this case,” along with ruling that discovery seeking “outflow, what his expenses are and whether he spends more money than he makes” was overbroad and beyond the scope of relevant discovery in this case. The Court also

ruled that Request 16 of Ms. Heard's 2nd Request for Documents seeking all transactions from January 1, 2010 to the present with a list of individuals was "overly broad" and beyond the scope of discovery in this case unless these individuals were "going to be potential witnesses" in the case.

On September 18, 2020 the Court ruled that Request Nos. 1-6 and 8 of Ms. Heard's 7th Requests for Documents and Request Nos. 1, 3, 5, and 7 of Ms. Heard's 7th Requests seeking financial related documents during the parties' marriage and related to the divorce case was overbroad and beyond the scope of relevant discovery in this case because "its denied under the doctrine of enough is enough. You all have been through the divorce already. We're not going to retry that divorce in this case."

Also on September 18, 2020 the Court specifically defined the narrow scope of relevant tax-return discovery in this case as only requiring "the documents which show the gross income...The supporting documents are not to be produced," and further Ordered that only "the amount of income" from the tax returns is relevant and that only involved "limited parts of [the tax return] that would show the income." The Court reiterated this scope of tax-return discovery on November 20 when it further ruled that only the "return pages" of tax returns needed to be produced, and "the supplementary documents that are attached to" the returns were beyond the scope of relevant discovery in this case. Any other tax-related documents are therefore beyond the scope of relevant discovery in this case.

Defendant and Counterclaim Plaintiff further objects to this Request because it seeks information protected by the attorney-client privilege, and on the grounds that this Request invades protected litigation work product and would require disclosure of core opinion work product and mental impression of counsel, which is prohibited by 4:1(b)(3) of the Rules of the

Virginia Supreme Court. Plaintiff and Counterclaim Defendant has not made the requisite showing under the Rules.

Defendant and Counterclaim Plaintiff further objects to this Request as overly broad, unduly burdensome, and seeking information not reasonably calculated to lead to the discovery of admissible evidence regarding the claims and defenses in this case, based on the Court's January 4, 2021 ruling on the *demurrer* and plea in bar dismissing certain allegations from the Counterclaim.

RESPONSE: Subject to and without waiving the objections, Defendant and Counterclaim Plaintiff stands on her objections to this Request.

SUPPLEMENTAL RESPONSE: Defendant and Counterclaim Plaintiff objects to this request as the statement in question has been Ordered dismissed as time-barred, and the Request is therefore moot.

18. All drafts of Your op-ed published in the *Washington Post*, which is referenced in Your Counterclaim at paragraph 37, and is the subject, at least in part, of the above-captioned action.

OBJECTION: Defendant and Counterclaim Plaintiff further objects to this Request because it seeks information protected by the attorney-client privilege, and on the grounds that this Request invades protected litigation work product and would require disclosure of core opinion work product and mental impression of counsel, which is prohibited by 4:1(b)(3) of the Rules of the Virginia Supreme Court. Plaintiff and Counterclaim Defendant has not made the requisite showing under the Rules.

RESPONSE: Subject to and without waiving the objections, Defendant and Counterclaim Plaintiff has produced or will produce non-privileged documents in response to this Request relevant to the statements at issue.

SUPPLEMENTAL RESPONSE: Subject to and without waiving objections, Defendant and Counterclaim Plaintiff has produced the following documents responsive to this request: ALH_10654-874, ALH_16281-845. Other produced documents may also be responsive.

19. All Documents and Communications regarding Your op-ed published in the *Washington Post*, which is referenced in Your Counterclaim at paragraph 37, and is the subject, at least in part, of the above-captioned action.

OBJECTION: Defendant and Counterclaim Plaintiff objects to this Request on the grounds that it is vague, ambiguous, and fails to define with particularity the information that it seeks, and is overly broad, unduly burdensome, harassing, and seeks information not reasonably calculated to lead to the discovery of admissible evidence regarding the claims and defenses in this case, taking into account the needs of the case, the amount in controversy, limitations on the parties' resources, the importance of the discovery in resolving the issues, and critically the Court's prior rulings defining the scope of relevant discovery in this case quoted in detail below.

On December 18, 2020, the Court ruled that Request 51 of Mr. Depp's 3rd Requests for Documents seeking all communications between Ms. Heard and anyone relating to her relationship with Mr. Depp, claims of abuse or violence involving Mr. Depp, and injuries Ms. Heard contends she suffered as a result of Mr. Depp's conduct was overbroad, and therefore beyond the scope of discovery in this case. The Court also ruled that Request 52 of Mr. Depp's 3rd Requests for Documents seeking all documents and communications relating to Ms. Heard's "relationship with Mr. Depp" was also overbroad, and therefore beyond the scope of discovery in this case.

Defendant and Counterclaim Plaintiff further objects to this Request because it seeks information protected by the attorney-client privilege, and on the grounds that this Request

invades protected litigation work product and would require disclosure of core opinion work product and mental impression of counsel, which is prohibited by 4:1(b)(3) of the Rules of the Virginia Supreme Court.. Plaintiff and Counterclaim Defendant has not made the requisite showing under the Rules.

RESPONSE: Subject to and without waiving the objections, please refer to the Defendant and Counterclaim Plaintiff's response and document production to Request No. 18 of these 4th Requests for Production of Documents. Defendant and Counterclaim Plaintiff otherwise stands on her objections to this Request.

SUPPLEMENTAL RESPONSE: Subject to and without waiving objections, Defendant and Counterclaim Plaintiff has produced the following documents responsive to this request: ALH_10654-874, ALH_16281-845. Other produced documents may also be responsive.

20. All Documents and Communications that refer, reflect, or relate to the alleged statement by Adam Waldman on April 12, 2019, referenced in Your Counterclaim at paragraph 42, and attached as Exhibit B thereto.

OBJECTION: Defendant and Counterclaim Plaintiff objects to this Request seeking documents "relating to" allegations in the Counterclaim on the grounds that it is vague, ambiguous, and fails to define with particularity the information that it seeks, and is overly broad, unduly burdensome, harassing, and seeks information not reasonably calculated to lead to the discovery of admissible evidence regarding the claims and defenses in this case, taking into account the needs of the case, the amount in controversy, limitations on the parties' resources, the importance of the discovery in resolving the issues, and critically the Court's prior rulings defining the scope of relevant discovery in this case quoted in detail below.

On December 18, 2020, the Court ruled that Request 51 of Mr. Depp's 3rd Requests for Documents seeking all communications between Ms. Heard and anyone relating to her relationship with Mr. Depp, claims of abuse or violence involving Mr. Depp, and injuries Ms. Heard contends she suffered as a result of Mr. Depp's conduct was overbroad, and therefore beyond the scope of discovery in this case. The Court also ruled that Request 52 of Mr. Depp's 3rd Requests for Documents seeking all documents and communications relating to Ms. Heard's "relationship with Mr. Depp" was also overbroad, and therefore beyond the scope of discovery in this case.

Defendant and Counterclaim Plaintiff further objects to this Request as overly broad, unduly burdensome, and seeking information not reasonably calculated to lead to the discovery of admissible evidence regarding the claims and defenses in this case, based on the Court's January 4, 2021 ruling on the *demurrer* and plea in bar dismissing certain allegations from the Counterclaim.

Defendant and Counterclaim Plaintiff further objects to this Request because it seeks information protected by the attorney-client privilege, and on the grounds that this Request invades protected litigation work product and would require disclosure of core opinion work product and mental impression of counsel, which is prohibited by 4:1(b)(3) of the Rules of the Virginia Supreme Court. Plaintiff and Counterclaim Defendant has not made the requisite showing under the Rules.

RESPONSE: Subject to and without waiving the objections, Defendant and Counterclaim Plaintiff has produced or will produce non-privileged documents in response to this Request relevant to the statements at issue in the claims, allegations, and defenses in this case.

SUPPLEMENTAL RESPONSE: Defendant and Counterclaim Plaintiff objects to this request as the statement in question has been Ordered dismissed as time-barred, and the request is therefore moot.

21. All Documents and Communications that support or otherwise relate to any contention that You have suffered monetary or any other damages as a result of the alleged statement by Adam Waldman on April 12, 2019, referenced in Your Counterclaim at paragraph 42, and attached as Exhibit B thereto.

OBJECTION: Defendant and Counterclaim Plaintiff objects to this Request seeking financial information, including seeking documents “otherwise relating to” it, on the grounds that it is vague, ambiguous, and fails to define with particularity the information that it seeks, and is overly broad, unduly burdensome, harassing, and seeks information not reasonably calculated to lead to the discovery of admissible evidence regarding the claims and defenses in this case, taking into account the needs of the case, the amount in controversy, limitations on the parties’ resources, the importance of the discovery in resolving the issues, and critically the Court’s prior rulings defining the scope of relevant discovery in this case quoted in detail below.

On July 24, 2020 the Court ruled that Request No. 14 of Ms. Heard’s 2nd Request for Documents seeking “income from all sources from 2010 to the present” was overbroad because “those types of things aren’t anything that would be helpful in this case,” along with ruling that discovery seeking “outflow, what his expenses are and whether he spends more money than he makes” was overbroad and beyond the scope of relevant discovery in this case. The Court also ruled that Request 16 of Ms. Heard’s 2nd Request for Documents seeking all transactions from January 1, 2010 to the present with a list of individuals was “overly broad” and beyond the scope of discovery in this case unless these individuals were “going to be potential witnesses” in the case.

On September 18, 2020 the Court ruled that Request Nos. 1-6 and 8 of Ms. Heard's 7th Requests for Documents and Request Nos. 1, 3, 5, and 7 of Ms. Heard's 7th Requests seeking financial related documents during the parties' marriage and related to the divorce case was overbroad and beyond the scope of relevant discovery in this case because "its denied under the doctrine of enough is enough. You all have been through the divorce already. We're not going to retry that divorce in this case."

Also on September 18, 2020 the Court specifically defined the narrow scope of relevant tax-return discovery in this case as only requiring "the documents which show the gross income...The supporting documents are not to be produced," and further Ordered that only "the amount of income" from the tax returns is relevant and that only involved "limited parts of [the tax return] that would show the income." The Court reiterated this scope of tax-return discovery on November 20 when it further ruled that only the "return pages" of tax returns needed to be produced, and "the supplementary documents that are attached to" the returns were beyond the scope of relevant discovery in this case. Any other tax-related documents are therefore beyond the scope of relevant discovery in this case.

Defendant and Counterclaim Plaintiff further objects to this Request as overly broad, unduly burdensome, and seeking information not reasonably calculated to lead to the discovery of admissible evidence regarding the claims and defenses in this case, based on the Court's January 4, 2021 ruling on the *demurrer* and plea in bar dismissing certain allegations from the Counterclaim.

Defendant and Counterclaim Plaintiff further objects to this Request because it seeks information protected by the attorney-client privilege, and on the grounds that this Request invades protected litigation work product and would require disclosure of core opinion work

product and mental impression of counsel, which is prohibited by 4:1(b)(3) of the Rules of the Virginia Supreme Court. Plaintiff and Counterclaim Defendant has not made the requisite showing under the Rules.

RESPONSE: Subject to and without waiving the objections, Defendant and Counterclaim Plaintiff stands on her objections to this Request.

SUPPLEMENTAL RESPONSE: Defendant and Counterclaim Plaintiff objects to this request as the statement in question has been Ordered dismissed as time-barred, and the request is therefore moot.

22. All Documents and Communications that refer, reflect, or relate to the alleged statement by Adam Waldman in June 2019, referenced in Your Counterclaim at paragraph 43, and attached as Exhibit C thereto.

OBJECTION: Defendant and Counterclaim Plaintiff objects to this Request seeking documents “relating to” allegations in the Counterclaim on the grounds that it is vague, ambiguous, and fails to define with particularity the information that it seeks, and is overly broad, unduly burdensome, harassing, and seeks information not reasonably calculated to lead to the discovery of admissible evidence regarding the claims and defenses in this case, taking into account the needs of the case, the amount in controversy, limitations on the parties’ resources, the importance of the discovery in resolving the issues, and critically the Court’s prior rulings defining the scope of relevant discovery in this case quoted in detail below.

On December 18, 2020, the Court ruled that Request 51 of Mr. Depp’s 3rd Requests for Documents seeking all communications between Ms. Heard and anyone relating to her relationship with Mr. Depp, claims of abuse or violence involving Mr. Depp, and injuries Ms. Heard contends she suffered as a result of Mr. Depp’s conduct was overbroad, and therefore beyond the scope of discovery in this case. The Court also ruled that Request 52 of Mr. Depp’s

3rd Requests for Documents seeking all documents and communications relating to Ms. Heard's "relationship with Mr. Depp" was also overbroad, and therefore beyond the scope of discovery in this case.

Defendant and Counterclaim Plaintiff further objects to this Request as overly broad, unduly burdensome, and seeking information not reasonably calculated to lead to the discovery of admissible evidence regarding the claims and defenses in this case, based on the Court's January 4, 2021 ruling on the *demurrer* and plea in bar dismissing certain allegations from the Counterclaim.

Defendant and Counterclaim Plaintiff further objects to this Request because it seeks information protected by the attorney-client privilege, and on the grounds that this Request invades protected litigation work product and would require disclosure of core opinion work product and mental impression of counsel, which is prohibited by 4:1(b)(3) of the Rules of the Virginia Supreme Court. Plaintiff and Counterclaim Defendant has not made the requisite showing under the Rules.

RESPONSE: Subject to and without waiving the objections, Defendant and Counterclaim Plaintiff has produced or will produce non-privileged documents in response to this Request relevant to the statements at issue.

SUPPLEMENTAL RESPONSE: Defendant and Counterclaim Plaintiff objects to this request as the statement in question has been Ordered dismissed as time-barred, and the request is therefore moot.

23. All Documents and Communications that support or otherwise relate to any contention that You have suffered monetary or any other damages as a result of the alleged statement by Adam Waldman in June 2019, referenced in Your Counterclaim at paragraph 43, and attached as Exhibit C thereto.

OBJECTION: Defendant and Counterclaim Plaintiff objects to this Request seeking financial information, including seeking documents “otherwise relating to” it, on the grounds that it is vague, ambiguous, and fails to define with particularity the information that it seeks, and is overly broad, unduly burdensome, harassing, and seeks information not reasonably calculated to lead to the discovery of admissible evidence regarding the claims and defenses in this case, taking into account the needs of the case, the amount in controversy, limitations on the parties’ resources, the importance of the discovery in resolving the issues, and critically the Court’s prior rulings defining the scope of relevant discovery in this case quoted in detail below.

On July 24, 2020 the Court ruled that Request No. 14 of Ms. Heard’s 2nd Request for Documents seeking “income from all sources from 2010 to the present” was overbroad because “those types of things aren’t anything that would be helpful in this case,” along with ruling that discovery seeking “outflow, what his expenses are and whether he spends more money than he makes” was overbroad and beyond the scope of relevant discovery in this case. The Court also ruled that Request 16 of Ms. Heard’s 2nd Request for Documents seeking all transactions from January 1, 2010 to the present with a list of individuals was “overly broad” and beyond the scope of discovery in this case unless these individuals were “going to be potential witnesses” in the case.

On September 18, 2020 the Court ruled that Request Nos. 1-6 and 8 of Ms. Heard’s 7th Requests for Documents and Request Nos. 1, 3, 5, and 7 of Ms. Heard’s 7th Requests seeking financial related documents during the parties’ marriage and related to the divorce case was overbroad and beyond the scope of relevant discovery in this case because “its denied under the doctrine of enough is enough. You all have been through the divorce already. We’re not going to retry that divorce in this case.”

Also on September 18, 2020 the Court specifically defined the narrow scope of relevant tax-return discovery in this case as only requiring “the documents which show the gross income...The supporting documents are not to be produced,” and further Ordered that only “the amount of income” from the tax returns is relevant and that only involved “limited parts of [the tax return] that would show the income.” The Court reiterated this scope of tax-return discovery on November 20 when it further ruled that only the “return pages” of tax returns needed to be produced, and “the supplementary documents that are attached to” the returns were beyond the scope of relevant discovery in this case. Any other tax-related documents are therefore beyond the scope of relevant discovery in this case.

Defendant and Counterclaim Plaintiff further objects to this Request as overly broad, unduly burdensome, and seeking information not reasonably calculated to lead to the discovery of admissible evidence regarding the claims and defenses in this case, based on the Court’s January 4, 2021 ruling on the *demurrer* and plea in bar dismissing certain allegations from the Counterclaim.

Defendant and Counterclaim Plaintiff further objects to this Request because it seeks information protected by the attorney-client privilege, and on the grounds that this Request invades protected litigation work product and would require disclosure of core opinion work product and mental impression of counsel, which is prohibited by 4:1(b)(3) of the Rules of the Virginia Supreme Court. Plaintiff and Counterclaim Defendant has not made the requisite showing under the Rules.

RESPONSE: Subject to and without waiving the objections, Defendant and Counterclaim Plaintiff stands on her objections to this Request.

SUPPLEMENTAL RESPONSE: Defendant and Counterclaim Plaintiff objects to this request as the statement in question has been Ordered dismissed as time-barred, and the request is therefore moot.

24. All Documents and Communications that refer, reflect, or relate to the alleged statement by Adam Waldman in July 2019, referenced in Your Counterclaim at paragraph 44, and attached as Exhibit D thereto.

OBJECTION: Defendant and Counterclaim Plaintiff objects to this Request seeking documents “relating to” allegations in the Counterclaim on the grounds that it is vague, ambiguous, and fails to define with particularity the information that it seeks, and is overly broad, unduly burdensome, harassing, and seeks information not reasonably calculated to lead to the discovery of admissible evidence regarding the claims and defenses in this case, taking into account the needs of the case, the amount in controversy, limitations on the parties’ resources, the importance of the discovery in resolving the issues, and critically the Court’s prior rulings defining the scope of relevant discovery in this case quoted in detail below.

On December 18, 2020, the Court ruled that Request 51 of Mr. Depp’s 3rd Requests for Documents seeking all communications between Ms. Heard and anyone relating to her relationship with Mr. Depp, claims of abuse or violence involving Mr. Depp, and injuries Ms. Heard contends she suffered as a result of Mr. Depp’s conduct was overbroad, and therefore beyond the scope of discovery in this case. The Court also ruled that Request 52 of Mr. Depp’s 3rd Requests for Documents seeking all documents and communications relating to Ms. Heard’s “relationship with Mr. Depp” was also overbroad, and therefore beyond the scope of discovery in this case.

Defendant and Counterclaim Plaintiff further objects to this Request as overly broad, unduly burdensome, and seeking information not reasonably calculated to lead to the discovery

of admissible evidence regarding the claims and defenses in this case, based on the Court's January 4, 2021 ruling on the *demurrer* and plea in bar dismissing certain allegations from the Counterclaim.

Defendant and Counterclaim Plaintiff further objects to this Request because it seeks information protected by the attorney-client privilege, and on the grounds that this Request invades protected litigation work product and would require disclosure of core opinion work product and mental impression of counsel, which is prohibited by 4:1(b)(3) of the Rules of the Virginia Supreme Court. Plaintiff and Counterclaim Defendant has not made the requisite showing under the Rules.

RESPONSE: Subject to and without waiving the objections, Defendant and Counterclaim Plaintiff has produced or will produce non-privileged documents in response to this Request relevant to the statements at issue in the claims, allegations, and defenses in this case.

SUPPLEMENTAL RESPONSE: Defendant and Counterclaim Plaintiff objects to this request as the statement in question has been Ordered dismissed as time-barred, and the request is therefore moot.

25. All Documents and Communications that support or otherwise relate to any contention that You have suffered monetary or any other damages as a result of the alleged statement by Adam Waldman in July 2019, referenced in Your Counterclaim at paragraph 44, and attached as Exhibit D thereto.

OBJECTION: Defendant and Counterclaim Plaintiff objects to this Request seeking financial information, including seeking documents "relating to" it, on the grounds that it is vague, ambiguous, and fails to define with particularity the information that it seeks, and is overly broad, unduly burdensome, harassing, and seeks information not reasonably calculated to

lead to the discovery of admissible evidence regarding the claims and defenses in this case, taking into account the needs of the case, the amount in controversy, limitations on the parties' resources, the importance of the discovery in resolving the issues, and critically the Court's prior rulings defining the scope of relevant discovery in this case quoted in detail below.

On July 24, 2020 the Court ruled that Request No. 14 of Ms. Heard's 2nd Request for Documents seeking "income from all sources from 2010 to the present" was overbroad because "those types of things aren't anything that would be helpful in this case," along with ruling that discovery seeking "outflow, what his expenses are and whether he spends more money than he makes" was overbroad and beyond the scope of relevant discovery in this case. The Court also ruled that Request 16 of Ms. Heard's 2nd Request for Documents seeking all transactions from January 1, 2010 to the present with a list of individuals was "overly broad" and beyond the scope of discovery in this case unless these individuals were "going to be potential witnesses" in the case.

On September 18, 2020 the Court ruled that Request Nos. 1-6 and 8 of Ms. Heard's 7th Requests for Documents and Request Nos. 1, 3, 5, and 7 of Ms. Heard's 7th Requests seeking financial related documents during the parties' marriage and related to the divorce case was overbroad and beyond the scope of relevant discovery in this case because "its denied under the doctrine of enough is enough. You all have been through the divorce already. We're not going to retry that divorce in this case."

Also on September 18, 2020 the Court specifically defined the narrow scope of relevant tax-return discovery in this case as only requiring "the documents which show the gross income...The supporting documents are not to be produced," and further Ordered that only "the amount of income" from the tax returns is relevant and that only involved "limited parts of [the

tax return] that would show the income.” The Court reiterated this scope of tax-return discovery on November 20 when it further ruled that only the “return pages” of tax returns needed to be produced, and “the supplementary documents that are attached to” the returns were beyond the scope of relevant discovery in this case. Any other tax-related documents are therefore beyond the scope of relevant discovery in this case.

Defendant and Counterclaim Plaintiff further objects to this Request as overly broad, unduly burdensome, and seeking information not reasonably calculated to lead to the discovery of admissible evidence regarding the claims and defenses in this case, based on the Court’s January 4, 2021 ruling on the *demurrer* and plea in bar dismissing certain allegations from the Counterclaim.

Defendant and Counterclaim Plaintiff further objects to this Request because it seeks information protected by the attorney-client privilege, and on the grounds that this Request invades protected litigation work product and would require disclosure of core opinion work product and mental impression of counsel, which is prohibited by 4:1(b)(3) of the Rules of the Virginia Supreme Court. Plaintiff and Counterclaim Defendant has not made the requisite showing under the Rules.

RESPONSE: Subject to and without waiving the objections, Defendant and Counterclaim Plaintiff stands on her objections to this Request.

SUPPLEMENTAL RESPONSE: Defendant and Counterclaim Plaintiff objects to this request as the statement in question has been Ordered dismissed as time-barred, and the request is therefore moot.

26. All Documents and Communications that refer, reflect, or relate to the alleged statement by Adam Waldman in July 2019, referenced in Your Counterclaim at paragraph 44, and attached as Exhibit E thereto.

OBJECTION: Defendant and Counterclaim Plaintiff objects to this Request seeking documents “relating to” allegations in the Counterclaim on the grounds that it is vague, ambiguous, and fails to define with particularity the information that it seeks, and is overly broad, unduly burdensome, harassing, and seeks information not reasonably calculated to lead to the discovery of admissible evidence regarding the claims and defenses in this case, taking into account the needs of the case, the amount in controversy, limitations on the parties’ resources, the importance of the discovery in resolving the issues, and critically the Court’s prior rulings defining the scope of relevant discovery in this case quoted in detail below.

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Defendant and Counterclaim Plaintiff further objects to this Request as overly broad, unduly burdensome, and seeking information not reasonably calculated to lead to the discovery of admissible evidence regarding the claims and defenses in this case, based on the Court’s January 4, 2021 ruling on the *demurrer* and plea in bar dismissing certain allegations from the Counterclaim.

Defendant and Counterclaim Plaintiff further objects to this Request because it seeks information protected by the attorney-client privilege, and on the grounds that this Request invades protected litigation work product and would require disclosure of core opinion work product and mental impression of counsel, which is prohibited by 4:1(b)(3) of the Rules of the Virginia Supreme Court. Plaintiff and Counterclaim Defendant has not made the requisite showing under the Rules.

RESPONSE: Subject to and without waiving the objections, Defendant and Counterclaim Plaintiff has produced or will produce non-privileged documents in response to this Request relevant to the statements at issue.

SUPPLEMENTAL RESPONSE: Defendant and Counterclaim Plaintiff objects to this request as the statement in question has been Ordered dismissed as time-barred, and the request is therefore moot.

27. All Documents and Communications that support or otherwise relate to any contention that You have suffered monetary or any other damages as a result of the alleged statement by Adam Waldman in July 2019, referenced in Your Counterclaim at paragraph 44, and attached as Exhibit E thereto.

OBJECTION: Defendant and Counterclaim Plaintiff objects to this Request seeking financial information, including seeking documents “otherwise relating to” it, on the grounds that it is vague, ambiguous, and fails to define with particularity the information that it seeks, and is overly broad, unduly burdensome, harassing, and seeks information not reasonably calculated to lead to the discovery of admissible evidence regarding the claims and defenses in this case, taking into account the needs of the case, the amount in controversy, limitations on the parties’ resources, the importance of the discovery in resolving the issues, and critically the Court’s prior rulings defining the scope of relevant discovery in this case quoted in detail below.

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On September 18, 2020 the Court ruled that Request Nos. 1-6 and 8 of Ms. Heard's 7th Requests for Documents and Request Nos. 1, 3, 5, and 7 of Ms. Heard's 7th Requests seeking financial related documents during the parties' marriage and related to the divorce case was overbroad and beyond the scope of relevant discovery in this case because "its denied under the doctrine of enough is enough. You all have been through the divorce already. We're not going to retry that divorce in this case."

Also on September 18, 2020 the Court specifically defined the narrow scope of relevant tax-return discovery in this case as only requiring "the documents which show the gross income...The supporting documents are not to be produced," and further Ordered that only "the amount of income" from the tax returns is relevant and that only involved "limited parts of [the tax return] that would show the income." The Court reiterated this scope of tax-return discovery on November 20 when it further ruled that only the "return pages" of tax returns needed to be produced, and "the supplementary documents that are attached to" the returns were beyond the

scope of relevant discovery in this case. Any other tax-related documents are therefore beyond the scope of relevant discovery in this case.

Defendant and Counterclaim Plaintiff further objects to this Request as overly broad, unduly burdensome, and seeking information not reasonably calculated to lead to the discovery of admissible evidence regarding the claims and defenses in this case, based on the Court's January 4, 2021 ruling on the *demurrer* and plea in bar dismissing certain allegations from the Counterclaim.

Defendant and Counterclaim Plaintiff further objects to this Request because it seeks information protected by the attorney-client privilege, and on the grounds that this Request invades protected litigation work product and would require disclosure of core opinion work product and mental impression of counsel, which is prohibited by 4:1(b)(3) of the Rules of the Virginia Supreme Court. Plaintiff and Counterclaim Defendant has not made the requisite showing under the Rules.

RESPONSE: Subject to and without waiving the objections, Defendant and Counterclaim Plaintiff stands on her objections to this Request.

SUPPLEMENTAL RESPONSE: Defendant and Counterclaim Plaintiff objects to this request as the statement in question has been Ordered dismissed as time-barred, and the request is therefore moot.

28. All Documents and Communications that refer, reflect, or relate to the alleged statement by Adam Waldman in April 2020, referenced in Your Counterclaim at paragraph 45, and attached as Exhibit F thereto.

OBJECTION: Defendant and Counterclaim Plaintiff objects to this Request seeking documents "relating to" allegations in the Counterclaim on the grounds that it is vague, ambiguous, and fails to define with particularity the information that it seeks, and is overly

broad, unduly burdensome, harassing, and seeks information not reasonably calculated to lead to the discovery of admissible evidence regarding the claims and defenses in this case, taking into account the needs of the case, the amount in controversy, limitations on the parties' resources, the importance of the discovery in resolving the issues, and critically the Court's prior rulings defining the scope of relevant discovery in this case quoted in detail below.

On December 18, 2020, the Court ruled that Request 51 of Mr. Depp's 3rd Requests for Documents seeking all communications between Ms. Heard and anyone relating to her relationship with Mr. Depp, claims of abuse or violence involving Mr. Depp, and injuries Ms. Heard contends she suffered as a result of Mr. Depp's conduct was overbroad, and therefore beyond the scope of discovery in this case. The Court also ruled that Request 52 of Mr. Depp's 3rd Requests for Documents seeking all documents and communications relating to Ms. Heard's "relationship with Mr. Depp" was also overbroad, and therefore beyond the scope of discovery in this case.

Defendant and Counterclaim Plaintiff further objects to this Request because it seeks information protected by the attorney-client privilege, and on the grounds that this Request invades protected litigation work product and would require disclosure of core opinion work product and mental impression of counsel, which is prohibited by 4:1(b)(3) of the Rules of the Virginia Supreme Court. Plaintiff and Counterclaim Defendant has not made the requisite showing under the Rules.

RESPONSE: Subject to and without waiving the objections, Defendant and Counterclaim Plaintiff has produced or will produce non-privileged documents in response to this Request relevant to the statements at issue.

SUPPLEMENTAL RESPONSE: Subject to and without waiving objections, Defendant and Counterclaim Plaintiff has produced documents responsive to this request. Please see bates numbers ALH10393-428. Please also see Ms. Heard's Expert Witness Designation, dated February 16, 2021. Other produced documents may also be responsive.

29. All Documents and Communications that support or otherwise relate to any contention that You have suffered monetary or any other damages as a result of the alleged statement by Adam Waldman in April 2020, referenced in Your Counterclaim at paragraph 45, and attached as Exhibit F thereto.

OBJECTION: Defendant and Counterclaim Plaintiff objects to this Request seeking financial information, including seeking documents otherwise relating to" it, on the grounds that it is vague, ambiguous, and fails to define with particularity the information that it seeks, and is overly broad, unduly burdensome, harassing, and seeks information not reasonably calculated to lead to the discovery of admissible evidence regarding the claims and defenses in this case, taking into account the needs of the case, the amount in controversy, limitations on the parties' resources, the importance of the discovery in resolving the issues, and critically the Court's prior rulings defining the scope of relevant discovery in this case quoted in detail below.

On July 24, 2020 the Court ruled that Request No. 14 of Ms. Heard's 2nd Request for Documents seeking "income from all sources from 2010 to the present" was overbroad because "those types of things aren't anything that would be helpful in this case," along with ruling that discovery seeking "outflow, what his expenses are and whether he spends more money than he makes" was overbroad and beyond the scope of relevant discovery in this case. The Court also ruled that Request 16 of Ms. Heard's 2nd Request for Documents seeking all transactions from January 1, 2010 to the present with a list of individuals was "overly broad" and beyond the scope

of discovery in this case unless these individuals were “going to be potential witnesses” in the case.

On September 18, 2020 the Court ruled that Request Nos. 1-6 and 8 of Ms. Heard’s 7th Requests for Documents and Request Nos. 1, 3, 5, and 7 of Ms. Heard’s 7th Requests seeking financial related documents during the parties’ marriage and related to the divorce case was overbroad and beyond the scope of relevant discovery in this case because “its denied under the doctrine of enough is enough. You all have been through the divorce already. We’re not going to retry that divorce in this case.”

Also on September 18, 2020 the Court specifically defined the narrow scope of relevant tax-return discovery in this case as only requiring “the documents which show the gross income...The supporting documents are not to be produced,” and further Ordered that only “the amount of income” from the tax returns is relevant and that only involved “limited parts of [the tax return] that would show the income.” The Court reiterated this scope of tax-return discovery on November 20 when it further ruled that only the “return pages” of tax returns needed to be produced, and “the supplementary documents that are attached to” the returns were beyond the scope of relevant discovery in this case. Any other tax-related documents are therefore beyond the scope of relevant discovery in this case.

Defendant and Counterclaim Plaintiff further objects to this Request because it seeks information protected by the attorney-client privilege, and on the grounds that this Request invades protected litigation work product and would require disclosure of core opinion work product and mental impression of counsel, which is prohibited by 4:1(b)(3) of the Rules of the Virginia Supreme Court. Plaintiff and Counterclaim Defendant has not made the requisite showing under the Rules.

RESPONSE: Subject to and without waiving the objections, Defendant and Counterclaim Plaintiff has produced or will produce non-privileged documents in response to this Request relevant to the statements at issue.

SUPPLEMENTAL RESPONSE: Subject to and without waiving objections, Defendant and Counterclaim Plaintiff has produced documents responsive to this request. Please see bates numbers ALH10393-10428. Please also see Ms. Heard's Expert Witness Designation, dated February 16, 2021. Other produced documents may also be responsive.

30. All Documents and Communications that refer, reflect, or relate to the alleged statement by Adam Waldman in April 2020, referenced in Your Counterclaim at paragraph 46, and attached as Exhibit G thereto.

OBJECTION: Defendant and Counterclaim Plaintiff objects to this Request seeking documents "relating to" allegations in the Counterclaim on the grounds that it is vague, ambiguous, and fails to define with particularity the information that it seeks, and is overly broad, unduly burdensome, harassing, and seeks information not reasonably calculated to lead to the discovery of admissible evidence regarding the claims and defenses in this case, taking into account the needs of the case, the amount in controversy, limitations on the parties' resources, the importance of the discovery in resolving the issues, and critically the Court's prior rulings defining the scope of relevant discovery in this case quoted in detail below.

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“relationship with Mr. Depp” was also overbroad, and therefore beyond the scope of discovery in this case.

Defendant and Counterclaim Plaintiff further objects to this Request because it seeks information protected by the attorney-client privilege, and on the grounds that this Request invades protected litigation work product and would require disclosure of core opinion work product and mental impression of counsel, which is prohibited by 4:1(b)(3) of the Rules of the Virginia Supreme Court. Plaintiff and Counterclaim Defendant has not made the requisite showing under the Rules.

RESPONSE: Subject to and without waiving the objections, Defendant and Counterclaim Plaintiff has produced or will produce non-privileged documents in response to this Request relevant to the statements at issue.

SUPPLEMENTAL RESPONSE: Subject to and without waiving objections, Defendant and Counterclaim Plaintiff has produced documents responsive to this request. Please see bates numbers ALH10393-428. Please also see Ms. Heard’s Expert Witness Designation, dated February 16, 2021. Other produced documents may also be responsive.

31. All Documents and Communications that support or otherwise relate to any contention that You have suffered monetary or any other damages as a result of the alleged statement by Adam Waldman in April 2020, referenced in Your Counterclaim at paragraph 46, and attached as Exhibit G thereto.

OBJECTION: Defendant and Counterclaim Plaintiff objects to this Request seeking financial information, including seeking documents “otherwise relating to” it, on the grounds that it is vague, ambiguous, and fails to define with particularity the information that it seeks, and is overly broad, unduly burdensome, harassing, and seeks information not reasonably calculated to lead to the discovery of admissible evidence regarding the claims and defenses in this case,

taking into account the needs of the case, the amount in controversy, limitations on the parties' resources, the importance of the discovery in resolving the issues, and critically the Court's prior rulings defining the scope of relevant discovery in this case quoted in detail below.

On July 24, 2020 the Court ruled that Request No. 14 of Ms. Heard's 2nd Request for Documents seeking "income from all sources from 2010 to the present" was overbroad because "those types of things aren't anything that would be helpful in this case," along with ruling that discovery seeking "outflow, what his expenses are and whether he spends more money than he makes" was overbroad and beyond the scope of relevant discovery in this case. The Court also ruled that Request 16 of Ms. Heard's 2nd Request for Documents seeking all transactions from January 1, 2010 to the present with a list of individuals was "overly broad" and beyond the scope of discovery in this case unless these individuals were "going to be potential witnesses" in the case.

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on November 20 when it further ruled that only the “return pages” of tax returns needed to be produced, and “the supplementary documents that are attached to” the returns were beyond the scope of relevant discovery in this case. Any other tax-related documents are therefore beyond the scope of relevant discovery in this case.

Defendant and Counterclaim Plaintiff further objects to this Request because it seeks information protected by the attorney-client privilege, and on the grounds that this Request invades protected litigation work product and would require disclosure of core opinion work product and mental impression of counsel, which is prohibited by 4:1(b)(3) of the Rules of the Virginia Supreme Court. Plaintiff and Counterclaim Defendant has not made the requisite showing under the Rules.

RESPONSE: Subject to and without waiving the objections, Defendant and Counterclaim Plaintiff has produced or will produce non-privileged documents in response to this Request relevant to the statements at issue.

SUPPLEMENTAL RESPONSE: Subject to and without waiving objections, Defendant and Counterclaim Plaintiff has produced documents responsive to this request. Please see bates numbers ALH10393-428. Please also see Ms. Heard’s Expert Witness Designation, dated February 16, 2021. Other produced documents may also be responsive.

32. All Documents and Communications that refer, reflect, or relate to the alleged statement by Adam Waldman in June 2020, referenced in Your Counterclaim at paragraph 47, and attached as Exhibit G thereto.

OBJECTION: Defendant and Counterclaim Plaintiff objects to this Request seeking documents “relating to” allegations in the Counterclaim on the grounds that it is vague, ambiguous, and fails to define with particularity the information that it seeks, and is overly broad, unduly burdensome, harassing, and seeks information not reasonably calculated to lead to

the discovery of admissible evidence regarding the claims and defenses in this case, taking into account the needs of the case, the amount in controversy, limitations on the parties' resources, the importance of the discovery in resolving the issues, and critically the Court's prior rulings defining the scope of relevant discovery in this case quoted in detail below.

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RESPONSE: Subject to and without waiving the objections, Defendant and Counterclaim Plaintiff has produced or will produce non-privileged documents in response to this Request relevant to the statements at issue.

SUPPLEMENTAL RESPONSE: Subject to and without waiving objections, Defendant and Counterclaim Plaintiff has produced documents responsive to this request. Please

see Exhibits to Counterclaim and bates numbers ALH10393-428. Please also see Ms. Heard's Expert Witness Designation, dated February 16, 2021. Other produced documents may also be responsive.

33. All Documents and Communications that support or otherwise relate to any contention that You have suffered monetary or any other damages as a result of the alleged statement by Adam Waldman in June 2020, referenced in Your Counterclaim at paragraph 47, and attached as Exhibit G thereto.

OBJECTION: Defendant and Counterclaim Plaintiff objects to this Request seeking financial information, including seeking documents "otherwise relating to" it, on the grounds that it is vague, ambiguous, and fails to define with particularity the information that it seeks, and is overly broad, unduly burdensome, harassing, and seeks information not reasonably calculated to lead to the discovery of admissible evidence regarding the claims and defenses in this case, taking into account the needs of the case, the amount in controversy, limitations on the parties' resources, the importance of the discovery in resolving the issues, and critically the Court's prior rulings defining the scope of relevant discovery in this case quoted in detail below.

On July 24, 2020 the Court ruled that Request No. 14 of Ms. Heard's 2nd Request for Documents seeking "income from all sources from 2010 to the present" was overbroad because "those types of things aren't anything that would be helpful in this case," along with ruling that discovery seeking "outflow, what his expenses are and whether he spends more money than he makes" was overbroad and beyond the scope of relevant discovery in this case. The Court also ruled that Request 16 of Ms. Heard's 2nd Request for Documents seeking all transactions from January 1, 2010 to the present with a list of individuals was "overly broad" and beyond the scope of discovery in this case unless these individuals were "going to be potential witnesses" in the case.

On September 18, 2020 the Court ruled that Request Nos. 1-6 and 8 of Ms. Heard's 7th Requests for Documents and Request Nos. 1, 3, 5, and 7 of Ms. Heard's 7th Requests seeking financial related documents during the parties' marriage and related to the divorce case was overbroad and beyond the scope of relevant discovery in this case because "its denied under the doctrine of enough is enough. You all have been through the divorce already. We're not going to retry that divorce in this case."

Also on September 18, 2020 the Court specifically defined the narrow scope of relevant tax-return discovery in this case as only requiring "the documents which show the gross income...The supporting documents are not to be produced," and further Ordered that only "the amount of income" from the tax returns is relevant and that only involved "limited parts of [the tax return] that would show the income." The Court reiterated this scope of tax-return discovery on November 20 when it further ruled that only the "return pages" of tax returns needed to be produced, and "the supplementary documents that are attached to" the returns were beyond the scope of relevant discovery in this case. Any other tax-related documents are therefore beyond the scope of relevant discovery in this case.

Defendant and Counterclaim Plaintiff further objects to this Request because it seeks information protected by the attorney-client privilege, and on the grounds that this Request invades protected litigation work product and would require disclosure of core opinion work product and mental impression of counsel, which is prohibited by 4:1(b)(3) of the Rules of the Virginia Supreme Court. Plaintiff and Counterclaim Defendant has not made the requisite showing under the Rules.

RESPONSE: Subject to and without waiving the objections, Defendant and Counterclaim Plaintiff has produced or will produce non-privileged documents in response to this Request relevant to the statements at issue in this case.

SUPPLEMENTAL RESPONSE: Subject to and without waiving objections, Defendant and Counterclaim Plaintiff has produced documents responsive to this request. Please see bates numbers ALH10393-428. Please also see Ms. Heard's Expert Witness Designation, dated February 16, 2021. Other produced documents may also be responsive.

34. All Communications between You and/or Your agents, on the one hand, and any film studio or other Person or entity with which You are professionally involved, on the other hand, regarding any of the following topics: (1) Mr. Depp's claims against You in this Action; (2) the U.K. Action; (3) any of the allegedly defamatory statements by Mr. Depp and/or Adam Waldman referenced in Your Counterclaim and/or attached to Your Counterclaim as Exhibits A- H; and (4) any other public statements by Mr. Depp or Adam Waldman regarding You.

OBJECTION: Defendant and Counterclaim Plaintiff objects to this Request seeking documents "regarding" these broad topics on the grounds that it is vague, ambiguous, and fails to define with particularity the information that it seeks, and is overly broad, unduly burdensome, harassing, and seeks information not reasonably calculated to lead to the discovery of admissible evidence regarding the claims and defenses in this case, taking into account the needs of the case, the amount in controversy, limitations on the parties' resources, the importance of the discovery in resolving the issues, and critically the Court's prior rulings defining the scope of relevant discovery in this case quoted in detail below.

On December 18, 2020, the Court ruled that Request 51 of Mr. Depp's 3rd Requests for Documents seeking all communications between Ms. Heard and anyone relating to her relationship with Mr. Depp, claims of abuse or violence involving Mr. Depp, and injuries Ms. Heard contends she suffered as a result of Mr. Depp's conduct was overbroad, and therefore

beyond the scope of discovery in this case. The Court also ruled that Request 52 of Mr. Depp's 3rd Requests for Documents seeking all documents and communications relating to Ms. Heard's "relationship with Mr. Depp" was also overbroad, and therefore beyond the scope of discovery in this case.

Defendant and Counterclaim Plaintiff further objects to this Request because on November 20, 2020 the Court ruled that discovery seeking documents "sufficient to reflect the impact" of the UK litigation "on Mr. Depp's reputation and career" was overly broad, unduly burdensome, and unreasonably vague, and therefore beyond the scope of discovery in this case.

On December 18, 2020 the Court also ruled that Request No. 23 of Mr. Depp's 1st Requests for Document and Request 50 of Mr. Depp's 3rd Requests for Documents seeking all documents and communications between Ms. Heard and The Sun/NGN was overbroad, and therefore beyond the scope of relevant discovery in this case. The Court also ruled that Request No. 51 of Mr. Depp's 3rd Requests for Documents seeking all documents and communications relating to the UK Action was also overbroad, and therefore beyond the scope of relevant discovery in this case.

Defendant and Counterclaim Plaintiff further objects to this Request as overly broad, unduly burdensome, and seeking information not reasonably calculated to lead to the discovery of admissible evidence regarding the claims and defenses in this case, based on the Court's January 4, 2021 ruling on the *demurrer* and plea in bar dismissing certain allegations from the Counterclaim.

Defendant and Counterclaim Plaintiff further objects to this Request because it seeks information protected by the attorney-client privilege, and on the grounds that this Request invades protected litigation work product and would require disclosure of core opinion work

product and mental impression of counsel, which is prohibited by 4:1(b)(3) of the Rules of the Virginia Supreme Court. Plaintiff and Counterclaim Defendant has not made the requisite showing under the Rules.

RESPONSE: Subject to and without waiving the objections, Defendant and Counterclaim Plaintiff stands on her objections to this Request.

SUPPLEMENTAL RESPONSE: Subject to and without waiving objections, Defendant and Counterclaim Plaintiff stands on her objections. Notwithstanding, Defendant and Counterclaim Plaintiff has produced documents responsive to this request that relate to the specific allegations and damages claimed. Please see bates numbers ALH_00010450-481. Please also see Ms. Heard's Expert Witness Designation, dated February 16, 2021. Other produced documents may also be responsive.

35. All Communications between You and Bianca Butti regarding Your allegations of violence or abuse against Mr. Depp.

OBJECTION: Defendant and Counterclaim Plaintiff objects to this Request on the grounds that it is vague, ambiguous, and fails to define with particularity the information that it seeks, and is overly broad, unduly burdensome, harassing, and seeks information not reasonably calculated to lead to the discovery of admissible evidence regarding the claims and defenses in this case, taking into account the needs of the case, the amount in controversy, limitations on the parties' resources, the importance of the discovery in resolving the issues, and critically the Court's prior rulings defining the scope of relevant discovery in this case quoted in detail below.

On December 18, 2020, the Court ruled that Request No. 42 of Mr. Depp's 3rd Request for Documents seeking all communications between Ms. Heard and Bianca Butti relating to Ms. Heard's relationship with Mr. Depp, this litigation, the divorce litigation,

the UK action, claims of abuse or violence involving Mr. Depp, and injuries Ms. Heard contended she suffered due to Mr. Depp's conduct was overbroad, and therefore beyond the scope of relevant discovery in this case.

The Court also ruled on December 18, 2020 that Request 51 of Mr. Depp's 3rd Requests for Documents seeking all communications between Ms. Heard and anyone relating to claims of abuse or violence involving Mr. Depp, and injuries Ms. Heard contends she suffered as a result of Mr. Depp's conduct was overbroad, and therefore beyond the scope of discovery in this case. The Court also ruled that Request 52 of Mr. Depp's 3rd Requests for Documents seeking all documents and communications relating to Ms. Heard's "relationship with Mr. Depp" was also overbroad, and therefore beyond the scope of discovery in this case.

RESPONSE: Subject to and without waiving the objections, Defendant and Counterclaim Plaintiff stands on her objections to this Request.

SUPPLEMENTAL RESPONSE: Defendant and Counterclaim Plaintiff stands on her objections to this Request.

36. All Communications between You and any other Person, other than Your attorneys, regarding Your allegations of violence or abuse against Mr. Depp.

OBJECTION: Defendant and Counterclaim Plaintiff objects to this Request seeking documents regarding allegations in the Counterclaim on the grounds that it is vague, ambiguous, and fails to define with particularity the information that it seeks, and is overly broad, unduly burdensome, harassing, and seeks information not reasonably calculated to lead to the discovery of admissible evidence regarding the claims and defenses in this case, taking into account the needs of the case, the amount in controversy, limitations on the parties' resources, the

importance of the discovery in resolving the issues, and critically the Court's prior rulings defining the scope of relevant discovery in this case quoted in detail below.

On December 18, 2020, the Court ruled that Request 51 of Mr. Depp's 3rd Requests for Documents seeking all communications between Ms. Heard and anyone relating to claims of abuse or violence involving Mr. Depp and injuries Ms. Heard contends she suffered as a result of Mr. Depp's conduct was overbroad, and therefore beyond the scope of discovery in this case. The Court also ruled that Request 52 of Mr. Depp's 3rd Requests for Documents seeking all documents and communications relating to Ms. Heard's "relationship with Mr. Depp" was also overbroad, and therefore beyond the scope of discovery in this case.

Defendant and Counterclaim Plaintiff further objects to this Request because it seeks information protected by the attorney-client privilege, and on the grounds that this Request invades protected litigation work product and would require disclosure of core opinion work product and mental impression of counsel, which is prohibited by 4:1(b)(3) of the Rules of the Virginia Supreme Court. Plaintiff and Counterclaim Defendant has not made the requisite showing under the Rules.

RESPONSE: Subject to and without waiving the objections, Defendant and Counterclaim Plaintiff stands on her objections to this Request.

SUPPLEMENTAL RESPONSE: Plaintiff and Counterclaimant stands on her objections to this Request. Notwithstanding, Defendant and Counterclaim Plaintiff has produced documents responsive to this request. Please see bates numbers ALH_00000001-16845. Other produced documents may also be responsive.

37. All Documents and Communications that refer, reflect, or relate to the impact that Your purported donation of the proceeds of Your settlement with Mr. Depp to charity had on Your reputation and career.

OBJECTION: Defendant and Counterclaim Plaintiff objects to this Request, including seeking documents “relating to,” on the grounds that it is vague, ambiguous, and fails to define with particularity the information that it seeks, and is overly broad, unduly burdensome, harassing, and seeks information not reasonably calculated to lead to the discovery of admissible evidence regarding the claims and defenses in this case, taking into account the needs of the case, the amount in controversy, limitations on the parties’ resources, the importance of the discovery in resolving the issues, and critically the Court’s prior rulings defining the scope of relevant discovery in this case quoted in detail below.

On December 18, 2020, the Court narrowly defined the scope of discovery regarding charitable donations for this case as only applying to “the \$7 million donation or pledge” and “that specific donation,” and held that related discovery seeking “how she spent her money and those types of things” was beyond the scope of discovery in this case. As part of this ruling, the court therefore ruled that Request 47 seeking all communications between Ms. Heard and anyone regarding any of her charitable donations and Request 46 seeking documents evidencing what Ms. Heard did with the divorce settlement funds beyond any that were donated to charity (both from Mr. Depp’s 3rd Requests for Documents) were beyond the scope of discovery in this case.

Defendant and Counterclaim Plaintiff further objects to this Request because it seeks information protected by the attorney-client privilege, and on the grounds that this Request invades protected litigation work product and would require disclosure of core opinion work product and mental impression of counsel, which is prohibited by 4:1(b)(3) of the Rules of the

Virginia Supreme Court. Plaintiff and Counterclaim Defendant has not made the requisite showing under the Rules.

RESPONSE: Subject to and without waiving the objections, Defendant and Counterclaim Plaintiff stands on her objections to this Request.

SUPPLEMENTAL RESPONSE: Subject to and without waiving objections, Defendant and Counterclaim Plaintiff is unaware of any documents responsive to this Request.

38. All Documents and Communications that refer, reflect, or relate to any and all publicity arising from Your divorce from Mr. Depp, including but not limited to any publicity associated with Your public claims to have donated the entirety of the proceeds of the divorce settlement to charity.

OBJECTION: Defendant and Counterclaim Plaintiff objects to this Request seeking financial information, including seeking documents “relating to” it, on the grounds that it is vague, ambiguous, and fails to define with particularity the information that it seeks, and is overly broad, unduly burdensome, harassing, and seeks information not reasonably calculated to lead to the discovery of admissible evidence regarding the claims and defenses in this case, taking into account the needs of the case, the amount in controversy, limitations on the parties’ resources, the importance of the discovery in resolving the issues, and critically the Court’s prior rulings defining the scope of relevant discovery in this case quoted in detail below.

On September 18, 2020 the Court ruled that Request Nos. 1-6 and 8 of Ms. Heard’s 7th Requests for Documents and Request Nos. 1, 3, 5, and 7 of Ms. Heard’s 7th Requests seeking financial related documents during the parties’ marriage and related to the divorce case was overbroad and beyond the scope of relevant discovery in this case because “its denied under the doctrine of enough is enough. You all have been through the divorce already. We’re not going to retry that divorce in this case.”

On November 20, 2020 the Court also ruled that Requests 1-5 of Ms. Heard's 8th Requests for Documents seeking deposition transcripts, pleadings, discovery responses, and document production from four other specific litigations regarding disputes over Mr. Depp's finances were "overly broad [and] burdensome" and beyond the scope of discovery in this case.

On December 18, 2020, the Court narrowly defined the scope of discovery regarding charitable donations for this case as only applying to "the \$7 million donation or pledge" and "that specific donation," and held that related discovery seeking "how she spent her money and those types of things" was beyond the scope of discovery in this case. As part of this ruling, the court therefore ruled that Request 47 seeking all communications between Ms. Heard and anyone regarding any of her charitable donations and Request 46 seeking documents evidencing what Ms. Heard did with the divorce settlement funds beyond any that were donated to charity (both from Mr. Depp's 3rd Requests for Documents) were beyond the scope of discovery in this case.

Defendant and Counterclaim Plaintiff further objects to this Request because it seeks information protected by the attorney-client privilege, and on the grounds that this Request invades protected litigation work product and would require disclosure of core opinion work product and mental impression of counsel, which is prohibited by 4:1(b)(3) of the Rules of the Virginia Supreme Court. Plaintiff and Counterclaim Defendant has not made the requisite showing under the Rules.

RESPONSE: Subject to and without waiving the objections, Defendant and Counterclaim Plaintiff stands on her objections to this Request.

SUPPLEMENTAL RESPONSE: Subject to and without waiving objections, Defendant and Counterclaim Plaintiff has produced documents responsive to this request. Please see bates numbers ALH_00010358-10392. Other produced documents may also be responsive.

39. All Documents and Communications that refer, reflect, or relate to any anonymous donations made on Your behalf on in Your name to the Children’s Hospital, Los Angeles, from January 1, 2016 to present.

OBJECTION: Defendant and Counterclaim Plaintiff objects to this Request, including seeking documents “relating to,” on the grounds that it is vague, ambiguous, and fails to define with particularity the information that it seeks, and is overly broad, unduly burdensome, harassing, and seeks information not reasonably calculated to lead to the discovery of admissible evidence regarding the claims and defenses in this case, taking into account the needs of the case, the amount in controversy, limitations on the parties’ resources, the importance of the discovery in resolving the issues, and critically the Court’s prior rulings defining the scope of relevant discovery in this case quoted in detail below.

On December 18, 2020, the Court narrowly defined the scope of discovery regarding charitable donations for this case as only applying to “the \$7 million donation or pledge” and “that specific donation,” and held that related discovery seeking “how she spent her money and those types of things” was beyond the scope of discovery in this case. As part of this ruling, the court therefore ruled that Request 47 seeking all communications between Ms. Heard and anyone regarding any of her charitable donations and Request 46 seeking documents evidencing what Ms. Heard did with the divorce settlement funds beyond any that were donated to charity (both from Mr. Depp’s 3rd Requests for Documents) were beyond the scope of discovery in this case.

Defendant and Counterclaim Plaintiff further objects to this Request because it seeks information protected by the attorney-client privilege, and on the grounds that this Request invades protected litigation work product and would require disclosure of core opinion work product and mental impression of counsel, which is prohibited by 4:1(b)(3) of the Rules of the

Virginia Supreme Court. Plaintiff and Counterclaim Defendant has not made the requisite showing under the Rules.

RESPONSE: Subject to and without waiving the objections, Defendant and Counterclaim Plaintiff has produced documents in response to this Request identifying the amounts donated on her behalf to Children’s Hospital, Los Angeles. Defendant and Counterclaim Plaintiff otherwise stands on her objections to this Request.

SUPPLEMENTAL RESPONSE: Subject to and without waiving objections, Defendant and Counterclaim Plaintiff has produced documents responsive to this request. Please see bates numbers ALH_00010358-10392. Other produced documents may also be responsive.

40. All Documents and Communications that refer, reflect, or relate to any anonymous donations made on Your behalf on in Your name to the American Civil Liberties Union, from January 1, 2016 to present.

OBJECTION: Defendant and Counterclaim Plaintiff objects to this Request, including seeking documents “relating to,” on the grounds that it is vague, ambiguous, and fails to define with particularity the information that it seeks, and is overly broad, unduly burdensome, harassing, and seeks information not reasonably calculated to lead to the discovery of admissible evidence regarding the claims and defenses in this case, taking into account the needs of the case, the amount in controversy, limitations on the parties’ resources, the importance of the discovery in resolving the issues, and critically the Court’s prior rulings defining the scope of relevant discovery in this case quoted in detail below.

On December 18, 2020, the Court narrowly defined the scope of discovery regarding charitable donations for this case as only applying to “the \$7 million donation or pledge” and “that specific donation,” and held that related discovery seeking “how she spent her money and those types of things” was beyond the scope of discovery in this case. As part of this ruling, the

court therefore ruled that Request 47 seeking all communications between Ms. Heard and anyone regarding any of her charitable donations and Request 46 seeking documents evidencing what Ms. Heard did with the divorce settlement funds beyond any that were donated to charity (both from Mr. Depp's 3rd Requests for Documents) were beyond the scope of discovery in this case.

Defendant and Counterclaim Plaintiff further objects to this Request because it seeks information protected by the attorney-client privilege, and on the grounds that this Request invades protected litigation work product and would require disclosure of core opinion work product and mental impression of counsel, which is prohibited by 4:1(b)(3) of the Rules of the Virginia Supreme Court. Plaintiff and Counterclaim Defendant has not made the requisite showing under the Rules.

RESPONSE: Subject to and without waiving the objections, Defendant and Counterclaim Plaintiff has produced documents in response to this Request identifying the amounts donated on her behalf to the ACLU. Defendant and Counterclaim Plaintiff otherwise stands on her objections to this Request.

SUPPLEMENTAL RESPONSE: Subject to and without waiving objections, Defendant and Counterclaim Plaintiff has produced documents responsive to this request. Please see bates numbers ALH_00010358-10392, ALH_00010487-10492. Other produced documents may also be responsive.

41. All Documents and Communications that refer, reflect, or relate to any anonymous donations made on Your behalf from January 1, 2016 to present.

OBJECTION: Defendant and Counterclaim Plaintiff objects to this Request, including seeking documents "relating to," on the grounds that it is vague, ambiguous, and fails to define with particularity the information that it seeks, and is overly broad, unduly burdensome,

harassing, and seeks information not reasonably calculated to lead to the discovery of admissible evidence regarding the claims and defenses in this case, taking into account the needs of the case, the amount in controversy, limitations on the parties' resources, the importance of the discovery in resolving the issues, and critically the Court's prior rulings defining the scope of relevant discovery in this case quoted in detail below.

On December 18, 2020, the Court narrowly defined the scope of discovery regarding charitable donations for this case as only applying to "the \$7 million donation or pledge" and "that specific donation," and held that related discovery seeking "how she spent her money and those types of things" was beyond the scope of discovery in this case. As part of this ruling, the court therefore ruled that Request 47 seeking all communications between Ms. Heard and anyone regarding any of her charitable donations and Request 46 seeking documents evidencing what Ms. Heard did with the divorce settlement funds beyond any that were donated to charity (both from Mr. Depp's 3rd Requests for Documents) were beyond the scope of discovery in this case.

Defendant and Counterclaim Plaintiff further objects to this Request because it seeks information protected by the attorney-client privilege, and on the grounds that this Request invades protected litigation work product and would require disclosure of core opinion work product and mental impression of counsel, which is prohibited by 4:1(b)(3) of the Rules of the Virginia Supreme Court. Plaintiff and Counterclaim Defendant has not made the requisite showing under the Rules.

RESPONSE: Subject to and without waiving the objections, Defendant and Counterclaim Plaintiff stands on her objections to this Request.

SUPPLEMENTAL RESPONSE: Subject to and without waiving objections, Defendant and Counterclaim Plaintiff has produced documents responsive to this request. Please see bates numbers ALH_00010358-10392. Other produced documents may also be responsive.

42. Documents sufficient to show whether and when You donated any portion of the settlement proceeds from the Divorce Action to charity, to the extent not previously produced.

OBJECTION: Defendant and Counterclaim Plaintiff objects to this Request seeking financial information, including seeking documents “relating to” it, on the grounds that it is vague, ambiguous, and fails to define with particularity the information that it seeks, and is overly broad, unduly burdensome, harassing, and seeks information not reasonably calculated to lead to the discovery of admissible evidence regarding the claims and defenses in this case, taking into account the needs of the case, the amount in controversy, limitations on the parties’ resources, the importance of the discovery in resolving the issues, and critically the Court’s prior rulings defining the scope of relevant discovery in this case quoted in detail below.

On December 18, 2020, the Court narrowly defined the scope of discovery regarding charitable donations for this case as only applying to “the \$7 million donation or pledge” and “that specific donation,” and held that related discovery seeking “how she spent her money and those types of things” was beyond the scope of discovery in this case. As part of this ruling, the court therefore ruled that Request 47 seeking all communications between Ms. Heard and anyone regarding any of her charitable donations and Request 46 seeking documents evidencing what Ms. Heard did with the divorce settlement funds beyond any that were donated to charity (both from Mr. Depp’s 3rd Requests for Documents) were beyond the scope of discovery in this case.

Defendant and Counterclaim Plaintiff further objects to this Request because it seeks information protected by the attorney-client privilege, and on the grounds that this Request

invades protected litigation work product and would require disclosure of core opinion work product and mental impression of counsel, which is prohibited by 4:1(b)(3) of the Rules of the Virginia Supreme Court. Plaintiff and Counterclaim Defendant has not made the requisite showing under the Rules.

RESPONSE: Subject to and without waiving the objections, please refer to the Defendant and Counterclaim Plaintiff's response and document production to Request Nos. 39-40 of these 4th Requests for Production of Documents. Defendant and Counterclaim Plaintiff otherwise stands on her objections to this Request.

SUPPLEMENTAL RESPONSE: Subject to and without waiving objections, Defendant and Counterclaim Plaintiff has produced documents responsive to this request. Please see bates numbers ALH_00010358-10392, ALH_00010487-10492. Other produced documents may also be responsive.

43. All Documents and Communications that evidence or reflect any damages alleged or sought by You in Your Counterclaim in this Action.

OBJECTION: Defendant and Counterclaim Plaintiff objects to this Request seeking financial information on the grounds that it is vague, ambiguous, and fails to define with particularity the information that it seeks, and is overly broad, unduly burdensome, harassing, and seeks information not reasonably calculated to lead to the discovery of admissible evidence regarding the claims and defenses in this case, taking into account the needs of the case, the amount in controversy, limitations on the parties' resources, the importance of the discovery in resolving the issues, and critically the Court's prior rulings defining the scope of relevant discovery in this case quoted in detail below.

On July 24, 2020 the Court ruled that Request No. 14 of Ms. Heard's 2nd Request for Documents seeking "income from all sources from 2010 to the present" was overbroad because "those types of things aren't anything that would be helpful in this case," along with ruling that discovery seeking "outflow, what his expenses are and whether he spends more money than he makes" was overbroad and beyond the scope of relevant discovery in this case. The Court also ruled that Request 16 of Ms. Heard's 2nd Request for Documents seeking all transactions from January 1, 2010 to the present with a list of individuals was "overly broad" and beyond the scope of discovery in this case unless these individuals were "going to be potential witnesses" in the case.

On September 18, 2020 the Court ruled that Request Nos. 1-6 and 8 of Ms. Heard's 7th Requests for Documents and Request Nos. 1, 3, 5, and 7 of Ms. Heard's 7th Requests seeking financial related documents during the parties' marriage and related to the divorce case was overbroad and beyond the scope of relevant discovery in this case because "its denied under the doctrine of enough is enough. You all have been through the divorce already. We're not going to retry that divorce in this case."

Also on September 18, 2020 the Court specifically defined the narrow scope of relevant tax-return discovery in this case as only requiring "the documents which show the gross income...The supporting documents are not to be produced," and further Ordered that only "the amount of income" from the tax returns is relevant and that only involved "limited parts of [the tax return] that would show the income." The Court reiterated this scope of tax-return discovery on November 20 when it further ruled that only the "return pages" of tax returns needed to be produced, and "the supplementary documents that are attached to" the returns were beyond the

scope of relevant discovery in this case. Any other tax-related documents are therefore beyond the scope of relevant discovery in this case.

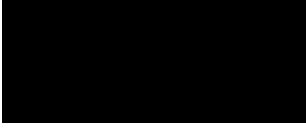
Defendant and Counterclaim Plaintiff further objects to this Request because it seeks information protected by the attorney-client privilege, and on the grounds that this Request invades protected litigation work product and would require disclosure of core opinion work product and mental impression of counsel, which is prohibited by 4:1(b)(3) of the Rules of the Virginia Supreme Court. Plaintiff and Counterclaim Defendant has not made the requisite showing under the Rules.

RESPONSE: Subject to and without waiving the objections, Defendant and Counterclaim Plaintiff has produced or will produce non-privileged documents in response to this Request relevant to the statements at issue.

SUPPLEMENTAL RESPONSE: Subject to and without waiving objections, Defendant and Counterclaim Plaintiff has produced documents responsive to this request. Please see bates numbers ALH_00000001-00016845. Please also see Ms. Heard's Expert Witness Designation, dated February 16, 2021. Other produced documents may also be responsive.

April 22, 2021

AS TO OBJECTIONS:



Elaine Charlson Bredehoft (VSB No. 23766)
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*Counsel to Defendant and Counterclaim
Plaintiff Amber Laura Heard*

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing was served this 22nd day of April 2021, by email, by agreement of the parties, addressed as follows:

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*Counsel for Plaintiff/Counterclaim
Defendant John C. Depp, II*



Elaine Charlson Bredehoft (VSB No. 23766)

ATTACHMENT 2

Elaine Bredehoft

From: Elaine Bredehoft
Sent: Thursday, April 08, 2021 1:26 PM
To: Chew, Benjamin G.
Cc: Vasquez, Camille M.
Subject: Scheduling Order, Motion to Compel, other Motions in the queue, and new matter in light of UK denial of further appeals

Ben: Thanks for your response. I look forward to seeing your mark up of the Scheduling Order, so we can discuss. Do you want to set up a time for a call on Monday?

On the 4th RFPs, while neither side has provided bates stamps for the responsive pleadings, we will agree to provide those in this instance to try to assist in resolving, and are working on that. I hope to get these to you asap.

On the other motions in the queue:

We have already met and conferred on the 10th, 11th, and 12th RFPs and the related RFAs. We have also met and conferred on using Tracey Jacobs' other depositions and documents that were sent during Ms. Jacobs' deposition. All of these are motions we were prepared to file, and intend to bring in turn, unless you want to reconsider your earlier positions.

In the meantime, another issue has developed that we believe takes priority. In light of the finality of the UK decision, including the exhaustion of the appeals, we are amending our Answer & Grounds of Defense and supplementing our Plea in Bar to include the defenses of comity, collateral estoppel, issue preclusion, res judicata, and the like. We need to request the consent of the Court to file these. We would also like to schedule a hearing on the Plea in Bar, a briefing schedule and we believe the Court should stay discovery pending a ruling on this.

Will you agree to a Consent Order permitting leave to file the Amended Answer & Grounds of Defense and Supplemental Plea in Bar? Will you join us in requesting a hearing date on the Supplemental Plea in Bar, a briefing schedule and agree to a stay pending decision? If so, we can prepare a Consent Order and approach Chief Judge Azcarate's law clerk for dates.

If you do not agree, we would like to set this down as soon as possible. If you will allow us the April 30 date, we would set it down on that Friday (I say allow because we have agreed that your motion to compel the 4th RFPs was already filed and scheduled for hearing, and therefore would be set first if you choose to proceed after seeing our supplemental responses). If you

want to retain that date, we would ask the Court to allow us May 7 for the request for leave, to set the hearing and briefing and for a stay pending.

Let me know your thoughts on this and if you want to schedule a time on Monday to discuss. How is 11:30 a.m. Eastern?

Thanks. Elaine

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From: Chew, Benjamin G. <BChew@brownrudnick.com>
Sent: Wednesday, April 07, 2021 3:31 PM
To: Elaine Bredehoft <ebredehoft@charlsonbredehoft.com>
Cc: Vasquez, Camille M. <CVasquez@brownrudnick.com>
Subject: Re: Follow up on scheduling a call

Elaine,

I will send you a mark up of your draft Scheduling Order in the next few days.

As agreed, Mr. Depp will bring on for hearing on April 30 his previously filed motion to compel. To the extent you believe Ms. Heard has produced documents responsive to any of the issues raised in that motion since we filed it, please provide us Bates ranges, noting the request(s) to which particular documents are responsive.

Am tied up through Friday, but let's talk Monday about fleshing out the concept of alternating available Friday motions days, and how to deal with those Fridays on which the party whose "turn" it is does not have a motion.

Best regards,

Ben

Sent from my iPhone

On Apr 7, 2021, at 12:58 PM, Elaine Bredehoft <ebredehoft@charlsonbredehoft.com> wrote:

CAUTION: External E-mail. Use caution accessing links or attachments.

Ben and Camille: I am following up on our scheduling a call to discuss the draft Scheduling Order. I have a few more things to cover as well, including discussing your Fourth RFPs (we have been working through those, I think we have provided the vast majority of what you have requested and are supplementing to reflect that, and we can talk about any concerns you may have specifically). In addition, I would like to discuss the substance of, timing and scheduling of our motions that we believe are the most pressing.

What works for you? Thanks. Elaine

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(703) 318-6800
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ATTACHMENT 3

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V I R G I N I A:

IN THE CIRCUIT COURT OF FAIRFAX COUNTY

- - - - -x

JOHNNY C. DEPP, II, :

Plaintiff, :

v. : Case No. CL-2019-0002911

AMBER LAURA HEARD, :

Defendant. :

- - - - -x

HEARING

BEFORE THE HONORABLE BRUCE D. WHITE

Conducted Virtually

Friday, September 18, 2020

10:15 a.m. ET

Job No.: 319581

Pages: 1 - 38

Reported By: Victoria Lynn Wilson, RMR, CRR

1 produced yesterday, detailed income statements of
2 Mr. Depp's three loan-out companies: Infinitum
3 Nihil, LRD, and Scaramanga Brothers.

4 Specifically, Mr. Depp produced from EWC
5 all detailed income statements from 2009 through
6 2015, and he produced detailed P&L's for those
7 three entities from 2016 through August 2020.

8 Moreover, we produced a summary of the
9 gross receipts for all of Mr. Depp's projects for
10 over a decade, spanning the period from 2009 to
11 2020.

12 And, again, your Honor, the reason that
13 this took so long was that Mr. Depp -- Mr. White
14 and his staff had to compile this information
15 which did not exist in Mr. Depp's custody.

16 So, getting to the other documents, they
17 say they want the tax returns from 2009 and 2010.
18 We respectfully submit that that doesn't overcome
19 the qualified privilege. Number one, his tax
20 returns for that period of time are not relevant.
21 And even if they were, Mr. Depp has now provided
22 more than sufficient alternatives relating to his

1 be required to provide all this information is
2 denied. Mr. Waldman is still currently counsel
3 for a party in the case.

4 As to the documents that I guess I've got
5 sort of categorized here as fourth RFP 14; sixth
6 RFPs 1 through 6 and 8; and seventh RFPs 1, 3, 5,
7 and 7, those are, basically, the information
8 related to the divorce case. Request is denied as
9 to those documents. It is denied under the
10 doctrine of it's enough is enough. You all have
11 been through the divorce already. We're not going
12 to retry that divorce in this case, and that's
13 what I deem this to be aimed at.

14 The fourth RFP 1 and 2, that is to be
15 produced by September 30th.

16 As to the tax documents, it's granted in
17 part and denied in part. The documents which show
18 the gross income are to be produced. The
19 supporting documents are not to be produced. You
20 all have got a lot of information on income, and
21 this is just one more area where I envision a
22 rehashing of previous other issues.

1 Your question is what's the amount of
2 income, and you can get that from the -- those
3 parts of the tax return is limited -- there's very
4 limited parts that would show the income.

5 As to the meeting with Mr. White, the
6 business manager, and is this the April meeting?
7 I'm not sure how that that is really related to
8 any issue that's going to be produced in our case,
9 but if after Mr. White is deposed, it appears that
10 there is some documents that are necessary, I'll
11 let you revisit that.

12 And I understand your argument that we
13 need the documents before we do the deposition,
14 and in this particular case, I don't find that to
15 be the case.

16 So, I think I have touched on everything.
17 If I missed a ruling on one of them, would you all
18 tell me.

19 MR. CHEW: No, I think that's it, your
20 Honor. And may we, once we have the benefit of
21 Ms. Wilson's transcript, which we will
22 respectfully order expedited, may we submit a

1 CERTIFICATE OF SHORTHAND REPORTER-E-NOTARY PUBLIC

2 I, Victoria Lynn Wilson, the officer
3 before whom the foregoing proceedings were taken,
4 do hereby certify that the foregoing transcript is
5 a true and correct record of the proceedings; that
6 said proceedings were taken by me stenographically
7 and thereafter reduced to typewriting under my
8 direction; and that I am neither counsel for,
9 related to, nor employed by any of the parties to
10 this case and have no interest, financial or
11 otherwise, in its outcome.

12 IN WITNESS WHEREOF, I have hereunto set my
13 hand and affixed my notarial seal this 18th day of
14 September 2020.

15 My commission expires May 31, 2023.

16

17

18

19 VICTORIA LYNN WILSON

20 E-NOTARY PUBLIC IN AND FOR

21 THE COMMONWEALTH OF VIRGINIA

22

ATTACHMENT 4

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V I R G I N I A:

IN THE CIRCUIT COURT OF FAIRFAX COUNTY

- - - - -x

JOHNNY C. DEPP, II, :

Plaintiff, :

v. : Case No. CL-2019-0002911

AMBER LAURA HEARD, :

Defendant. :

- - - - -x

HEARING

BEFORE THE HONORABLE BRUCE D. WHITE

Conducted Virtually

Friday, December 18, 2020

11:29 a.m. ET

Job No.: 342428

Pages: 1 - 32

Reported By: Victoria Lynn Wilson, RMR, CRR

1 a problem with lying, and she had to say that, "I
2 gave it away to other victims like me,
3 \$7 million." That's a lie. And the Court in Los
4 Angeles, Judge Bowick, was incensed by that. I
5 think this case -- Court should be incensed by
6 that.

7 She can still make her argument that
8 she -- that somehow, "I donated to charity," you
9 know, didn't mean what it said. She's able to
10 make that argument, but she should be compelled to
11 produce those documents by noon Monday or just to
12 certify that she didn't do it, she didn't honor
13 her pledges. And, your Honor, that's only fair,
14 your Honor.

15 Thank you, your Honor.

16 THE COURT: All right. Thank you both.

17 With regards to the first category, second
18 request for production number 7 as to the arrest
19 records, that motion to compel is granted. I
20 understand that it may or may not be admissible.
21 Whether it leads to something or not is such that
22 it's appropriate that it be discovered.

1 Second category, that is second RFP number
2 23 and the third RFPs 50 and 51, the motion to
3 compel there is denied. I find that is overbroad.

4 And as to number three, the third RFP, I
5 think it's number 42, 43, and 52, that is also
6 overruled as being overbroad -- I'm sorry -- and
7 not compelled. Denied.

8 As to number four, which is RFP 44, 45,
9 46, and 47, I agree we're not going to relitigate
10 the divorce, but the issue of the \$7 million
11 donation or pledge or whatever it actually is, I
12 think that is now subject to discovery, so the
13 motion is granted as to that. It's denied as to
14 how she spent her money and those type of things,
15 but as to that specific donation, that's
16 compelled.

17 With regards to the fifth category, second
18 interrogatory number 1, 7, 8, and 9,
19 supplementation is required by the Rules of Court.
20 The Court doesn't generally set a date for that
21 supplementation because the Rules of Court compel
22 the parties to do it. So that's denied as to

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2 I, Victoria Lynn Wilson, the officer
3 before whom the foregoing proceedings were taken,
4 do hereby certify that the foregoing transcript is
5 a true and correct record of the proceedings; that
6 said proceedings were taken by me stenographically
7 and thereafter reduced to typewriting under my
8 direction; and that I am neither counsel for,
9 related to, nor employed by any of the parties to
10 this case and have no interest, financial or
11 otherwise, in its outcome.

12 IN WITNESS WHEREOF, I have hereunto set my
13 hand and affixed my notarial seal this 18th day of
14 December 2020.

15 My commission expires May 31, 2023.

16

17

18

19 VICTORIA LYNN WILSON
20 E-NOTARY PUBLIC IN AND FOR
21 THE COMMONWEALTH OF VIRGINIA

22

ATTACHMENT 5

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VIRGINIA:

IN THE CIRCUIT COURT OF FAIRFAX COUNTY

----- x

JOHNNY C. DEPP, II, :

Plaintiff, :

v. : Case No.

AMBER LAURA HEARD, : Cl-2019-0002911

Defendant. :

----- x

HEARING

BEFORE THE HONORABLE BRUCE D. WHITE

Conducted Virtually

Fairfax County, Virginia

Friday, November 20, 2020

10:32 a.m.

Job No.: 336300

Pages: 1 - 33

Reported By: Carla L. Andrews, RPR

1 time as to the matters actually docketed. Thank
2 you.

3 MS. BREDEHOFT: Thank you, Your Honor. I
4 will reserve the rest for rebuttal.

5 MR. CHEW: Good morning again, Your
6 Honor. Ben Chew for plaintiff. Your Honor, the
7 Court should deny Ms. Heard's motion in its
8 entirety. And we respectfully submit that Mr. Depp
9 should be awarded the costs of defending this
10 frivolous motion. I will be happy to proceed in the
11 order in which --

12 THE COURT: Mr. Chew, your volume needs
13 to come up just a little bit, if you don't mind.
14 Thank you.

15 MR. CHEW: Yes, Your Honor. Apologies.
16 First, Your Honor, with respect to the tax
17 documents, as Your Honor may recall, on September 18
18 Your Honor ruled as followed, quote, The documents
19 which show the gross income should be produced. The
20 supporting documents are not to be produced. That's
21 the transcript of the September 18 proceeding at
22 page 35.

1 Mr. Depp timely produced all such
2 documents on September 30. Specifically, Your
3 Honor, Mr. Depp produced the Form 1120-S forms with
4 the federal statements from 2009 through the present
5 for each of Mr. Depp's three earn-out entries from
6 which he receives his salary. That's where he gets
7 all of his income from the three entities --
8 Infinitum Nihil, LRD Productions, Inc., and
9 Scaramanga, Inc. These 1120-S forms report income
10 gains, losses, deductions, credits, et cetera, for
11 each entity covered by an election to be an S
12 corporation. We redacted only the company's
13 personal identifiers, such as the employer
14 identification number.

15 So, Your Honor, we complied with this
16 back on September 30. They show all of the gross
17 income. And Ms. Bredehoft is free to examine
18 Mr. White, whose company prepared those documents.
19 Mr. Depp -- quoting from his deposition, Mr. Depp is
20 not a tax accountant and was not intimately involved
21 in the production of documents by his manager and
22 accountant. So, Your Honor, that should be denied.

1 that category of documents just as Judge Bowick in
2 California has twice denied Ms. Heard's motions to
3 seek documents from TMG. To the extent the Court is
4 inclined to grant any portion of Ms. Heard's motion
5 with respect to that category -- the other
6 litigation -- we would respectfully request that the
7 Court order Ms. Heard to pay Mr. Depp's counsel for
8 their time, which would be substantial, and for the
9 massive costs that would be entailed in reproducing
10 more than two million documents, none of which have
11 anything to do with this case or Ms. Heard and would
12 require Mr. Bloom's counsel and TMG's counsel again
13 to refight the issues of confidentiality.

14 Finally, Your Honor, as to the last
15 category, these are categories of document requests
16 six through nine, Ms. Bredehoft is frankly mistaken.
17 There is no impasse as to these documents --
18 document requests. But they are still, despite
19 Mr. Treece's effort, overly broad. I will go
20 through them very quickly.

21 Requests six and seven call for documents
22 sufficient to show the impact of the other

1 litigation on Mr. Depp's career. So that's an
2 extremely vague and ambiguous request. There is no
3 file of documents which, you know, impact litigation
4 on Mr. Depp's career. We have agreed in principle
5 to produce documents, if any, that relate to the
6 impact of the litigation on his career. But it is a
7 very vague request.

8 Request number eight. Mr. Depp testified
9 last week that Disney never wrote or otherwise
10 informed him that it had cut him loose from the
11 Pirates of the Caribbean series only days after
12 Ms. Heard published her op-ed in the Washington
13 Post. Mr. Depp had to read about it in the
14 newspaper.

15 We agreed to produce documents relating
16 to career -- lost career opportunities from Disney,
17 if any. But this request is hopelessly, again,
18 overbroad. It calls for materials relating to any
19 complaints Disney may have had over the period,
20 decisions in timing as to the filming, career
21 decisions, anything related to other litigation,
22 financial compensation.

1 Your Honor has already ordered Mr. Depp
2 to produce, and he has produced all documents
3 related to his damages claims. So that's already
4 been done. But this request is overly broad. We
5 are willing to work with them on six, seven, and
6 eight to narrow it to something that makes sense.

7 Finally, request number nine, which calls
8 for any and all insurance company regarding any film
9 that Mr. Depp has ever done or any other project in
10 which he has ever done. Again, Your Honor, this is
11 overly broad. We agree and have agreed to produce
12 any documents relating to any claims made against an
13 insurance company based on any conduct by Mr. Depp,
14 which we haven't found. But this request calls for
15 any and all insurance information regarding any film
16 or other project which is, again, Your Honor,
17 hopelessly overbroad. We would respectfully request
18 that the Court deny Ms. Heard's motion in its
19 entirety and award us the costs of having to defend
20 this. Thank you, Your Honor.

21 MS. BREDEHOFT: Is Your Honor ready for
22 me?

1 THE COURT: All right. Thank you all.
2 The objections to request for production one through
3 five are sustained. I find them to be overly broad,
4 burdensome. As to six and seven, they are sustained
5 on that grounds as well and additionally on the
6 grounds of vagueness. As to six and seven, the
7 request to produce the documents requested in
8 paragraph -- in number eight is granted. The
9 request as to paragraph number nine is denied. The
10 request with regards to the personal income tax
11 returns is granted as to the return pages, not all
12 the supplementary documents that are attached to
13 them.

14 And, Ms. Bredehoft, I am going to make a
15 comment to you. And maybe I shouldn't, but I am
16 going to, anyway. But you risk losing credibility
17 with the Court when you come before the Court and
18 accuse the other side of not following the rules.
19 Yet, you repeatedly have tried to add matters to the
20 argument docket that were not on the docket. That
21 would be a violation of the rules.

22 You also send vastly overbroad requests

1 CERTIFICATE OF SHORTHAND REPORTER - E-NOTARY PUBLIC

2

3 I, Carla L. Andrews, the officer before
4 whom the foregoing proceedings were taken, do hereby
5 certify that the foregoing transcript is a true and
6 correct record of the proceedings; that said
7 proceedings were taken by me stenographically and
8 thereafter reduced to typewriting under my
9 supervision; that review was not requested; and that
10 I am neither counsel for, related to, nor employed
11 by any of the parties to this case and have no
12 interest, financial or otherwise, in its outcome.

13

14 IN WITNESS WHEREOF, I have hereunto set
15 my hand and affixed my notarial seal this 23rd day
16 of November, 2020.

17

18

19 E-NOTARY PUBLIC IN AND FOR
20 THE COMMONWEALTH OF VIRGINIA

21

22 My Commission Expires: April 30, 2023

ATTACHMENT 6

VIRGINIA:

IN THE CIRCUIT COURT OF FAIRFAX COUNTY

John C. Depp, II,

Plaintiff,

v.

Amber Laura Heard,

Defendant.

Civil Action No.: CL-2019-0002911

PLAINTIFF JOHN C. DEPP II'S OPPOSITION TO MOTION TO COMPEL EIGHT
REQUEST FOR PRODUCTION AND TAX INFORMATION

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Counsel for Plaintiff John C. Depp, II

representation over a period of nearly two decades. Vast quantities of documents totaling millions of pages were produced and exchanged in discovery in both litigations, by Mr. Depp and *scores of third parties* unrelated to this litigation. The vast majority of such materials were designated “Confidential” in connection with Protective Orders entered by the Superior Court for the County of Los Angeles, California, and the documents, depositions, and discovery responses in those cases relate to *sensitive aspects of Mr. Depp’s business, personal, and privileged legal affairs over a seventeen-year period*. Moreover, numerous documents were exchanged between Mr. Depp and his former managers and attorneys *that would be privileged as to Ms. Heard*.

As noted above, Ms. Heard’s purported limitation of the scope of these RFPs to particular topics is, in reality, no limitation at all, because the topics are ludicrously overbroad and amorphous. Ms. Heard cannot credibly argue that any litigation document that has something to do with “witness interactions”; “Mr. Depp’s explanations for his conduct”; “claims for damages”; “perception of other person’s fault”; “photographs”; and “medical issues” is per se relevant to this action. To the contrary, absent an explanation for how the “Other Litigation” directly relates to the Depp/Heard relationship—which is not the case—*none* of those topics are relevant or appropriate.

In short, Ms. Heard’s attempt to engage in an open-ended fishing expedition into these matters is nothing short of outrageous, and should be rejected out of hand.

II. The Parties Did Not Reach Impasse On RFP Nos. 6-9

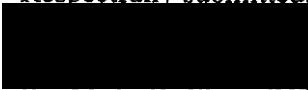
True to form, Ms. Heard and her counsel moved to compel RFP Nos. 6-9 before the parties reached impasse.

Ms. Heard’s RFP Nos. 6 and 7 are somewhat odd, in that they seek “documents sufficient to reflect the impact” of various litigation on Mr. Depp’s reputation and career. (There is no file

of documents conveniently labelled as reflecting the impact litigation on Mr. Depp's career, rendering these RFPs highly ambiguous and subject to interpretation. It is not entirely clear what documents would even be considered responsive. Nonetheless—as Ms. Heard concedes in her Motion—*Mr. Depp has never refused to produce documents in response to these RFPs*, and agrees in principle that responsive documents, if any are determined to exist, will be produced. (See Motion at pp. 4) (“Plaintiff agreed in its responses and in the meet and confer to produce non-privileged documents that analyze the impact of these litigations on Plaintiff’s career”). The Motion is unnecessary and inappropriate to the extent it demands production of documents that are already agreed to be produced.

As for Ms. Heard’s RFP No. 8, Mr. Depp agrees in principle with producing documents and communications between himself and Walt Disney related to lost career opportunities in response (and, indeed, Mr. Depp believes that there are no such documents in his possession that would be responsive to a request for such documents that have not already been produced). However, a close reading of Ms. Heard’s proposed RFP No. 8 reveals that, like the rest of her requests, it is overbroad. For instance, Ms. Heard demands communications that relate to any “complaints” of any nature; “decisions and timing” (whatever that means); “career decisions” (same—it is unclear what that actually means); “financial compensation” (this would only be appropriate to the extent it relates to damages, i.e., *lost* compensation); and “anything related to Mr. Depp’s Other Litigation” (clearly overbroad, as the “Other Litigation” is not at issue). Mr. Depp is willing to work with Ms. Heard to develop more reasonable parameters for these requests, and there is certainly a subset of documents sought that could be legitimately discoverable. But as posed, this is overbroad and inappropriate.

Respectfully submitted,


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*Counsel for Plaintiff and
Counterclaim Defendant John C. Depp, II*

Dated: November 13, 2020

ATTACHMENT 7



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Transcript of John C. Depp, II

Date: November 10, 2020

Case: Depp, II -v- Heard

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Transcript of John C. Depp, II
Conducted on November 10, 2020

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1	A	It's perfect.	12:11:42
2	Q	Do you recall that that was a public	12:11:43
3		record filing?	12:11:46
4	A	Public record filing?	12:11:48
5	Q	Your divorce decree -- do you understand	12:11:50
6		that that was -- your judgment of final decree was	12:11:52
7		a public record filing?	12:11:56
8		MR. CHEW: Objection to the form of the	12:11:58
9		question, calls for a legal conclusion.	12:11:59
10	A	I have only been led to understand that	12:12:01
11		-- well, I remember it at the time. That was why I	12:12:13
12		was able -- when she had broken -- or breached the	12:12:17
13		agreement, then I was able to in fact make the	12:12:21
14		first set of donations to those charities myself,	12:12:27
15		but I put it in her name. So I gave the first two	12:12:35
16		to the charities, and then Ms. Heard came out and	12:12:40
17		wildly complained about it, saying that I should be	12:12:47
18		charged the double, 14 million, because I was	12:12:50
19		trying to use that as a tax write-off.	12:12:55
20	Q	Did you pay any of the seven million in	12:13:02
21		settlement to Amber Heard because she alleged that	12:13:07
22		you had engaged in domestic violence against her?	12:13:12

Transcript of John C. Depp, II
Conducted on November 10, 2020

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1	A	No, she dropped the charges.	12:13:15
2		MR. CHEW: You may answer that question	12:13:18
3		to the extent that you are not disclosing any	12:13:20
4		attorney-client privilege.	12:13:22
5	A	No, it's very simple. She had dropped	12:13:23
6		any charges of violence against me.	12:13:26
7	Q	So --	12:13:30
8	A	In fact, there were no --	12:13:31
9		MR. CHEW: Please stop interrupting him.	12:13:33
10		THE WITNESS: No --	12:13:35
11		MR. CHEW: We're going to call the court.	
12		THE WITNESS: It's okay. I'm starting to	12:13:36
13		like it.	12:13:36
14		MS. CHARLSON BREDEHOFT: He runs on a	12:13:36
15		lot, and I would like you to talk with him --	12:13:37
16		MR. CHEW: I would like you to stop	12:13:38
17		interrupting him.	12:13:40
18		THE WITNESS: I'm sorry. What have I	12:13:41
19		done?	12:13:41
20		MS. CHARLSON BREDEHOFT: He runs on a	12:13:41
21		lot, and --	12:13:43
22		THE WITNESS: Oh, do I run on?	12:13:43

Transcript of John C. Depp, II
Conducted on November 10, 2020

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1	THE REPORTER: Question: "So none of the	12:15:00
2	\$7 million that you paid to Amber Heard was because	
3	or as a result of her alleging that you'd engaged	
4	in domestic abuse or violence; is that correct?"	12:15:01
5	MR. CHEW: And same instruction.	12:15:01
6	THE WITNESS: None of the \$7 million that	12:15:04
7	she was awarded in the divorce had anything	12:15:07
8	whatsoever to do with any -- any of her claims, any	12:15:10
9	of that, no.	12:15:18
10	MS. CHARLSON BREDEHOFT: You can take	12:15:20
11	your break now.	12:15:21
12	MR. CHEW: Thank you.	12:15:22
13	THE VIDEOGRAPHER: We're going off the	12:15:23
14	record. The time is 12:15.	12:15:25
15	(Recessed at 12:15 p.m.)	12:15:28
16	(Reconvened at 1:32 p.m.)	12:15:28
17	THE VIDEOGRAPHER: We are back on the	13:31:54
18	record. The time is 13:32.	13:32:15
19	BY MS. CHARLSON BREDEHOFT:	13:32:17
20	Q Mr. Depp, while we were talking this	13:32:17
21	morning, you had indicated that Ms. Heard had	13:32:23
22	engaged in I believe you called it a campaign of	13:32:27

1 CERTIFICATE OF SHORTHAND REPORTER - NOTARY PUBLIC

2 I, Karen Young, the officer before whom
3 the foregoing deposition was taken, do hereby
4 certify that the foregoing transcript is a true and
5 correct record of the testimony given; that said
6 testimony was taken by me stenographically and
7 thereafter reduced to typewriting under my
8 direction, and that I am neither counsel for or
9 related to, nor employed by any of the parties to
10 this case and have no interest, financial or
11 otherwise, in its outcome.

12 IN WITNESS WHEREOF, I have hereunto set
13 my hand and affixed my notarial seal this 17th day
14 of November, 2020.



17 NOTARY PUBLIC IN AND FOR
18 THE COMMONWEALTH OF VIRGINIA

19
20 My commission expires:

21 June 30, 2022

22 Registration No. 7046852

ATTACHMENT 8

VIRGINIA:

IN THE CIRCUIT COURT OF FAIRFAX COUNTY

JOHN C. DEPP, II

Plaintiff,

v.

AMBER LAURA HEARD

Defendant.

Civil Action No.: CL-2019-0002911

**DEFENDANT AMBER LAURA HEARD'S RESPONSES AND OBJECTIONS TO
PLAINTIFF'S THIRD SET OF REQUESTS FOR PRODUCTION**

Pursuant to Rule 4:9 of the Rules of the Supreme Court of Virginia ("Rules"), Defendant Amber Laura Heard, by and through her attorneys, submits these responses and objections (the "Responses") to Plaintiff John C. Depp's Third Set of Requests for Production dated August 14, 2020 (the "Requests").

GENERAL OBJECTIONS

The following general objections and responses (the "General Objections") are incorporated into each specific objection and response (the "Specific Objections") as if fully set forth therein:

1. Defendant objects to the Requests to the extent they are duplicative, cumulative, or seek information that has been or will be provided through other means of discovery.
2. Defendant objects to the Requests to the extent they are vague, ambiguous, overly broad, unduly burdensome, seek information not relevant to the claims or defenses of any party, or are not proportional to the needs of the case.
3. Defendant objects to the Requests to the extent they impose any obligations or requirements beyond the scope of the Rules or any case law interpreting them.

41. All Communications between You and Rami Sarabi that refer or relate to Your relationship with Mr. Depp, including without limitation any Communications that refer or relate to the Action, the Divorce Action, the U.K. Action, any claims of abuse or violence involving Mr. Depp, and any injuries You contend You suffered as a result of any conduct by Mr. Depp.

RESPONSE:

Defendant objects to this request on the grounds that it is overbroad and unduly burdensome and seeks Information that is not relevant to the claims or defenses in this action and not reasonably calculated to lead to the discovery of admissible evidence. Defendant further objects to this request to the extent it seeks information that is already available to and equally accessible to Plaintiff. Defendant objects to this request to the extent it seeks privileged information protected from disclosure, including information protected by the attorney-client privilege or work product doctrine and any other applicable privilege, immunity or protection. Subject to the foregoing specific and general objections, Defendant has produced in this action and/or the U.K. litigation (which Plaintiff already possesses from the trial bundles) non-privileged responsive documents and will produce any additional, non-privileged documents that are identified by a reasonable search that refer or relate to the claims and defenses in this case.

42. All Communications between You and Bianca Butti that refer or relate to Your relationship with Mr. Depp, including without limitation any Communications that refer or relate to the Action, the Divorce Action, the U.K. Action, any claims of abuse or violence involving Mr. Depp, and any injuries You contend You suffered as a result of any conduct by Mr. Depp.

RESPONSE:

Defendant objects to this request on the grounds that it is overbroad and unduly burdensome because it seeks information that is not relevant to the claims or defenses in this action and not reasonably calculated to lead to the discovery of admissible evidence. Defendant objects to this request to the extent it seeks privileged information protected from disclosure, including

information protected by the attorney-client privilege or work product doctrine and any other applicable privilege, immunity or protection.

Notwithstanding any non-privileged, responsive documents Defendant may have produced in this action and/or the U.K. litigation (which Plaintiff already possesses from the trial bundles), Defendant stands on the objections.

(43.) All Communications between You and any other Person that refer or relate to Your relationship with Mr. Depp, including without limitation any Communications that refer or relate to the Action, the Divorce Action, the U.K. Action, any claims of abuse or violence involving Mr. Depp, and any injuries You contend You suffered as a result of any conduct by Mr. Depp.

RESPONSE:

Defendant objects to this request on the grounds that it is overbroad and unduly burdensome because it seeks information that is not relevant to the claims or defenses in this action and not reasonably calculated to lead to the discovery of admissible evidence. Defendant further objects to this request to the extent it seeks information that is already available to and equally accessible to Plaintiff. Defendant objects to this request to the extent it seeks privileged information protected from disclosure, including information protected by the attorney-client privilege or work product doctrine and any other applicable privilege, immunity or protection.

Notwithstanding any non-privileged, responsive documents Defendant may have produced in this action and/or the U.K. litigation (which Plaintiff already possesses from the trial bundles), Defendant stands on the objections.

44. All Documents that evidence or reflect any donations made by You of any settlement payments made to You by Mr. Depp in connection with the Divorce Action.

RESPONSE:

September 4, 2020

AS TO OBJECTIONS:

[REDACTED]

Elaine Charlson Bredehoft (VSB No. 23700)
Adam S. Nadelhaft (VSB No. 91717)
David E. Murphy (VSB No. 90938)
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J. Benjamin Rottenborn (VSB No. 84796)
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brottenborn@woodsrogers.com
jtreece@woodsrogers.com

Counsel to Defendant Amber Laura Heard

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing was served this 4th day of September 2020, by email, by agreement of the parties, addressed as follows:

Benjamin G. Chew, Esq.
Andrew C. Crawford, Esq.
BROWN RUDNICK LLP
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Adam R. Waldman, Esq.
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Washington, DC 20006
awaldman@theendeavorgroup.com

Counsel for Plaintiff John C. Depp, II



Elaine Charlson Bredehoff (VSB No. 23766)

ATTACHMENT 9

Michelle Bredehoft

From: Robert B. Gilmore <RGilmore@steinmitchell.com>
Sent: Wednesday, September 04, 2019 9:28 AM
To: rschwartz@bgrfirm.com; SRoche@cameronmcevoy.com
Cc: CVasquez@brownrudnick.com; BChew@brownrudnick.com
Subject: John C. Depp, II v. Amber Laura Heard// Case No. CL-2019-0002911
Attachments: DRAFT ESI Protocol.docx

Counsel:

I'm writing to follow up on our meet and confer telephone calls of August 21 and August 27, regarding Defendant's responses to Plaintiff's initial requests for production and interrogatories.

Defendant's RFP responses

1. Approach to production of ESI:
 - You confirmed that Ms. Heard's attorneys are working with an e-discovery vendor to direct the collection of her documents (including ESI).
 - Attached is a proposed ESI protocol regarding the formatting and metadata for producing documents. Please let us know if this is agreeable or if you have any questions/comments.
2. Withholding of documents on grounds other than privilege: you confirmed that, except with respect to the five RFPs to which Defendant has objected and not indicated any productions will be forthcoming, Defendant is not withholding documents on grounds other than privilege.
3. Issues with specific responses:
 - **RFP 15:** as we explained to you, this request seeks plainly relevant documents. For example, a document in which Ms. Heard or another person described an injury Ms. Heard allegedly suffered as a result of a supposed altercation with Mr. Depp, but where Ms. Heard (or someone else) describes the injury as in reality resulting from her assaulting Mr. Depp, is directly relevant to her the truth of her allegations that she suffered domestic abuse. Therefore, Ms. Heard should produce all such non-privileged documents.
 - **RFPs 18 and 27:** as we discussed, without conceding that these two requests as stated are overbroad, in the interest of avoiding the need for the Court's intervention Plaintiff is willing to narrow these two requests so that they are limited to documents concerning physical abuse or concerning Mr. Depp. You objected to the latter alternate criteria, but as I explained on the call, an email in which Ms. Heard tells Mr. Musk that Mr. Depp is a loving, gentle, person, is probative of whether Ms. Heard's allegations of domestic abuse are true. Therefore, as narrowed, Plaintiff seeks production of non-privileged documents responsive to these requests.
 - **RFP 21:** as we discussed, any non-privileged documents relating to Ms. Heard's appearance at the LA Superior Court on May 27, 2016 likely will be relevant for the claims, defenses and issues in this case; therefore, Plaintiff is unwilling to narrow this request.
 - **RFP 28:** as we discussed, without conceding that this request as stated is overbroad, in the interest of avoiding the need for the Court's intervention Plaintiff is willing to narrow this request so that it is limited to documents/communications concerning Mr. Musk visiting Ms. Heard during or within 72 hours after any instance where Ms. Heard alleges that Mr. Depp engaged in physical abuse towards her.

Please confirm by close of business, Thursday, September 5, that Ms. Heard will revisit her objections and produce the documents identified above.

Defendant's Interrogatory Responses

1. **Supplementation:** as we discussed, we expect, and you agreed, that Defendant will timely supplement her responses once she has produced documents in the case, so that she more specifically and comprehensively identifies documents reflecting the supposed information in her current responses.
2. **Privilege assertion concerning communications with third parties:** you indicated that Defendant was willing to produce communications involving her, her lawyers, and outside parties, despite a colorable claim of privilege over such communications, if Plaintiff agreed that the fact of such a production did not constitute a subject-matter waiver over all other privileged communications. Plaintiff is willing to agree to that non-waiver agreement, provided that Defendant does not cherry-pick the communications she would be producing, but instead will be producing all such communications responsive to Plaintiff's discovery requests.

Regards,
Rob Gilmore

Robert B. Gilmore
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Washington DC 20005
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C 202.352.1877
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rgilmore@steinmitchell.com
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From: "Richard A. Schwartz" <rschwartz@bgrfirm.com>
Date: Monday, August 26, 2019 at 5:22 PM
To: Sean Roche <SRoche@cameronmcevoy.com>
Cc: "Vasquez, Camille M." <CVasquez@brownrudnick.com>, Ben Chew <BChew@brownrudnick.com>, Robert Gilmore <RGilmore@steinmitchell.com>
Subject: Re: John C. Depp, II v. Amber Laura Heard// Case No. CL-2019-0002911

That time will work for me. Thanks.

On Aug 26, 2019, at 2:00 PM, Sean Roche <SRoche@cameronmcevoy.com> wrote:

Works for me.

Rick, does that work for you?

Also, during any call, we'd also like to discuss the prior request (by email) for counsel to accept service on behalf of individuals that may be employed by, or acting as agents for, the parties. The email proposed a list of individuals we thought you all may be able to accept service on behalf and we are willing to consider the same. We're running into difficulty getting people served, including instances of people appearing to be home but simply refusing to answer the door for service. In the same email

we'd raised the idea of using declarations for out of state witnesses which we'd also like to discuss. Can you all discuss on your end and let us know your position during any call tomorrow?

All of the above seems to benefit both sides equally so I'd like to see if we can start to craft stipulations that may work for everyone.

Sean

Sean Patrick Roche, Esq.
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Find us on the web at: <http://www.cameronmcevoy.com>

Bio: <http://www.cameronmcevoy.com/attorneys/sean-patrick-roche/>

Paralegal: Sally Ribera
703.460.9350
sribera@cameronmcevoy.com

From: Vasquez, Camille M. <CVasquez@brownrudnick.com>
Sent: Monday, August 26, 2019 4:33 PM
To: Sean Roche <SRoche@cameronmcevoy.com>; Chew, Benjamin G. <BCheW@brownrudnick.com>
Cc: Robert B. Gilmore <RGilmore@steinmitchell.com>; Richard A. Schwartz <rschwartz@bgrfirm.com>
Subject: RE: John C. Depp, II v. Amber Laura Heard// Case No. CL-2019-0002911

Sean,

Does 3:30 p.m. ET work for you?

From: Sean Roche [<mailto:SRoche@cameronmcevoy.com>]
Sent: Monday, August 26, 2019 10:36 AM
To: Chew, Benjamin G.
Cc: Robert B. Gilmore; Vasquez, Camille M.; Richard A. Schwartz
Subject: RE: John C. Depp, II v. Amber Laura Heard// Case No. CL-2019-0002911

External E-mail. Use caution accessing links or attachments.

Ben, let's lock in Sept. 27 for the protective order hearing date. I'll email Judge White's law clerk now (and copy everyone else) and confirm that date works.

I need to catch up with Rick though I'm fairly certain anytime tomorrow afternoon works on our end for the meet and confer on the discovery if you all want to regroup on your end and propose a time to talk.

Sean

Sean Patrick Roche, Esq.
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Bio: <http://www.cameronmcevoy.com/attorneys/sean-patrick-roche/>

Paralegal: Sally Ribera
703.460.9350
sribera@cameronmcevoy.com

From: Chew, Benjamin G. <BChew@brownrudnick.com>
Sent: Wednesday, August 21, 2019 2:58 PM
To: Sean Roche <SRoche@cameronmcevoy.com>
Subject: John C. Depp, II v. Amber Laura Heard// Case No. CL-2019-0002911

Dear Sean,

Hope your week is going well.

Mr. Depp has decided to oppose Defendant's motion for entry of a protective order. The rationale, which I would be happy to discuss with you in more detail, is that Ms. Heard chose to publish her op-ed in the *Washington Post* last December, defaming Mr. Depp, and then attached to the papers in support of her motion to dismiss (transfer venue) a declaration attaching materials unrelated to the merits of her motion, apparently for the purpose of continuing her assault on Plaintiff's character. It seems unfair that, having done so, she should then be allowed to retreat behind the cover of a protective order.

I am having ablation surgery on August 28 (for which I will have to stay in the hospital overnight), and have a deposition in Los Angeles on September 19, so would ask that you please set the motion for entry of protective order for hearing either on Friday, September 13, 2019, or Friday, September 27 (assuming those dates are available for you and Chief Judge White), meaning our opposition briefs would be due either on September 6 or September 20, depending on the date you select for the hearing.

Best regards,

Ben

N.B. As previously agreed, we are still set for Mr. Depp's deposition at Mr. George's offices in Los Angeles on Wednesday, October 2.

<image001.jpg>

Benjamin G. Chew
Partner

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www.brownrudnick.com

Please consider the environment before printing this e-mail

From: Sally Ribera [<mailto:sribera@cameronmcevoy.com>]
Sent: Tuesday, August 13, 2019 3:37 PM
To: Crawford, Andrew C.; Chew, Benjamin G.; Vasquez, Camille M.; Claudia Bonilla (CBonilla@bqrfirm.com); Weingarten, Elliot J.; Eric M. George; Kevin Attridge; Lachmin Singh; Laura Leibowitz; Laurie Schwartz ; Milin Chun; Richard A. Schwartz; Robert Gilmore; Sally Ribera; Sean Roche; Theresa Burgess; Timothy McEvoy
Subject: John C. Depp, II v. Amber Laura Heard// Case No. CL-2019-0002911

External E-mail. Use caution accessing links or attachments.

Dear Counsel,

Please see the attached filed in connection with the above-referenced matter.

Thank you,

Sally M. Ribera
Litigation Assistant
Cameron/McEvoy, PLLC, A Litigation Boutique
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703.460.9350 (direct)
703.273.8897 (fax)

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