

This SUBPOENA/SUBPOENA DUCES TECUM TO PERSON UNDER FOREIGN SUBPOENA is being served by a private process server who must provide proof of service in accordance with Va. Code § 8.01-325.

TO the person authorized to serve this process: Upon execution, the return of this process shall be made to the Clerk of Court.

NAME: Corporate Designee of Edward White & Co., LLP	
ADDRESS: c/o Brown Rudnick, LLP 2211 Michelson Drive, Seventh Floor	
<input type="checkbox"/> PERSONAL SERVICE	Tel. No. Irvine, CA 92612
Being unable to make personal service, a copy was delivered in the following manner:	
<input type="checkbox"/> Delivered to family member (not temporary sojourner or guest) age 16 or older at usual place of abode of party named above after giving information of its purport. List name, age of recipient, and relation of recipient to party named above:	
<input type="checkbox"/> Posted on front door or such other door as appears to be the main entrance of usual place of abode, address listed above. (Other authorized recipient not found.)	
<input type="checkbox"/> not found, Sheriff
DATE	by , Deputy Sheriff

JOHN T. FREY, CLERK
FAIRFAX COUNTY CIRCUIT COURT
4110 CHAIN BRIDGE ROAD
FAIRFAX, VIRGINIA 22030

**SUBPOENA/SUBPOENA DUCES TECUM
TO PERSON UNDER FOREIGN SUBPOENA**

File No. 2019-002911

Commonwealth of Virginia VA CODE §§ 8.01-412.8—8.01-412.15; Rule 4:9

FAIRFAX COUNTY

Circuit Court

4110 Chain Bridge Road, 3rd Floor, Fairfax, VA 22030

ADDRESS OF COURT

JOHN C. DEPP, II

v./In re: AMBER LAURA HEARD

TO THE PERSON AUTHORIZED BY LAW TO SERVE THIS PROCESS:

You are commanded to summon

Corporate Designee of Edward White & Co, LLP c/o Brown Rudnick, LLP

NAME

2211 Michelson Drive, Seventh Floor

STREET ADDRESS

Irvine

CA

city

STATE

FILED
CIVIL INTAKE
2021 JAN 21 11:32 AM
JOHN T. FREY
CLERK, CIRCUIT COURT
FAIRFAX, VA

TO THE PERSON SUMMONED: You are commanded to

attend and give testimony at a deposition

produce the books, documents, records, electronically stored information, and tangible things designated and described below

.....
.....
.....

at Remote Via Zoom Per Judicial Council of California Emergency Rule 11 at February 17, 2021 at 1:00pm PST ;
LOCATION DATE AND TIME

and to permit inspection and copying by the requesting party or someone acting in his or her behalf of the designated items in your possession, custody or control

permit inspection of the premises

at the following location

.....
LOCATION

on
DATE AND TIME

This subpoena is issued upon the request of the party named below

Defendant Amber Laura Heard

NAME OF REQUESTING PARTY

c/o Charlson Bredehoff Cohen & Brown, P.C., 11260 Roger Bacon Drive, Suite 201

STREET ADDRESS

Reston

VA

20190

703 318 6800

CITY

STATE

ZIP

TELEPHONE NUMBER

The requesting party has submitted to this Clerk's Office the foreign subpoena, copy attached, the terms of which are incorporated herein, and the written statement required by Virginia Code § 8.01-412.10.

The names, addresses and telephone numbers of all counsel of record in the proceeding to which the subpoena relates and of parties not represented by counsel are provided [] below [] on attached list.

January 21st, 2021
DATE ISSUED

JOHN T. FREY, CLERK

by [REDACTED]

Elaine Charlson Bredehoff for Defendant
NAME OF ATTORNEY FOR REQUESTING PARTY

23766 VA
BAR NUMBER LICENSING STATE

11260 Roger Bacon Drive, Suite 201
OFFICE ADDRESS

703 318 6800
TELEPHONE NUMBER OF ATTORNEY

Reston, VA 20190
OFFICE ADDRESS

703 318 6808
FACSIMILE NUMBER OF ATTORNEY

NAME

BAR NUMBER LICENSING STATE

STREET ADDRESS

TELEPHONE NUMBER

STREET ADDRESS

FACSIMILE NUMBER

NAME

BAR NUMBER LICENSING STATE

STREET ADDRESS

TELEPHONE NUMBER

STREET ADDRESS

FACSIMILE NUMBER

NAME

BAR NUMBER LICENSING STATE

STREET ADDRESS

TELEPHONE NUMBER

STREET ADDRESS

FACSIMILE NUMBER

RETURN OF SERVICE (see page three of this form)

VIRGINIA:

IN THE CIRCUIT COURT OF FAIRFAX COUNTY

JOHN C. DEPP, II,

Plaintiff,

v.

AMBER LAURA HEARD,

Defendant.

Civil Action No.: CL-2019-0002911

COUNSEL OF RECORD FOR ALL PARTIES

<p>Benjamin G. Chew (VSB 29113) Andrew C. Crawford (VSB 89093) BROWN RUDNICK LLP 601 Thirteenth Street, N.W. Washington, D.C. 20005 Telephone: (202) 536-1700 Facsimile: (202) 536-1701 bchew@brownrudnick.com acrawford@brownrudnick.com <i>Counsel for Plaintiff John C. Depp, II</i></p>	<p>Camille M. Vasquez (admitted <i>pro hac vice</i>) BROWN RUDNICK LLP 2211 Michelson Drive Irvine, CA 92612 Telephone: (949) 752-7100 Facsimile: (949) 252-1514 cvasquez@brownrudnick.com <i>Counsel for Plaintiff John C. Depp, II</i></p>
<p>Elaine Charlson Bredehoft (VSB No. 23766) Adam S. Nadelhaft (VSB No. 91717) David E. Murphy (VSB No. 90938) Charlson Bredehoft Cohen & Brown, P.C. 11260 Roger Bacon Drive, Suite 201 Reston, Virginia 20190 Telephone: (703) 318-6800 ebredehoft@cbcblaw.com anadelhaft@cbcblaw.com dmurphy@cbcblaw.com <i>Counsel for Defendant Amber Laura Heard</i></p>	<p>J. Benjamin Rottenborn (VSB No. 84796) Joshua R. Treece (VSB No. 79149) WOODS ROGERS PLC 10 S. Jefferson Street, Suite 1400 P.O. Box 14125 Roanoke, Virginia 24011 Telephone: (540) 983-7540 broddenborn@woodsrogers.com jtreece@woodsrogers.com <i>Counsel for Defendant Amber Laura Heard</i></p>

ATTACHMENT

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

DEFINITIONS

- a. **Action.** The term "Action" means the above-captioned action.
- b. **And/or.** The use of "and/or" shall be interpreted in every instance both conjunctively and disjunctively in order to bring within the scope of these discovery requests any information which might otherwise be construed to be outside their scope.
- c. **Communication.** The term "communication" means any oral or written exchange of words, thoughts, or ideas to another person, whether person-to-person, in a group, by phone, text (SMS), letter, fax, e-mail, internet post or correspondence, social networking post or correspondence or by any other process, electric, electronic, photographs, video or audio tape recordings, or otherwise. All such Communications are included without regard to the storage or transmission medium (electronically stored information and hard copies are included within this definition).
- d. **Complaint.** The term "Complaint" means the Complaint, dated March 1, 2019, filed in the Action.
- e. **Concerning.** The term "concerning" includes relating to, referring to, describing, evidencing, or constituting.
- f. **Correspondence.** The term "correspondence" means any document(s) and/or communication(s) sent to or received from another entity and/or person.
- g. **Defendant, Counterclaim Plaintiff and/or Ms. Heard.** The terms "Defendant," "Counterclaim Plaintiff" and/or "Ms. Heard" refer to Defendant/Counterclaim Plaintiff Amber Laura Heard, including her agents, representatives, employees, assigns, and all persons acting on her behalf.
- h. **Document.** The term "document" is defined in its broadest terms currently recognized. The term shall include, without limitations: any written or other compilation of information (whether printed, handwritten, recorded, or encoded, produced, reproduced, or reproducible by any other process), drafts (revisions or finals), original or preliminary notes, and summaries of other documents, communications of any type (e-mail, text messages, blog posts, social media posts or other similar communications or correspondence), computer tape, computer files, and including all of their contents and attached files. The term "document" shall also include but not be limited to: correspondence, memoranda, contractual documents, specifications, drawings, photographs, audio or video recordings, images, aperture cards, notices of revisions, test reports, inspection reports, evaluations, technical reports, schedules, agreements, reports, studies, analyses, projections, forecasts, summaries, records of conversations or interviews, minutes or records of conferences or meetings, manuals, handbooks, brochures, pamphlets, advertisements,

circulars, press releases, financial statements, calendars, diaries, trip reports, etc. A draft of a non-identical copy is a separate document within the meaning of this term.

l. **Engaged.** The term "Engaged," in relation to a person (as defined herein), means contracted, directed, hired, retained, formed an agreement with (whether formal or informal, binding or nonbinding, written or oral), and/or procured the services of, whether or not in exchange for remuneration or other valuable consideration.

j. **Including.** The term "including" means including but not limited to.

k. **Person.** The term "person" is defined as any natural person, business, company, partnership, legal entity, governmental entity, and/or association.

l. **Performance.** The term "Performance," in relation to Mr. Depp, means any creative work in which Mr. Depp or his likeness is, was, will be, may be, or is contemplated to appear, whether or not in exchange for payment or other benefit to Mr. Depp, and includes (without limitation) any appearance (or potential appearance) by Mr. Depp in any film, TV series, product endorsement, advertisement, musical performance, or in-person appearance. To avoid doubt, a Performance includes any creative work in which it was contemplated that Mr. Depp or his likeness would be featured, even if the work was ultimately created without Mr. Depp or his likeness appearing.

m. **Plaintiff, Counterclaim Defendant and/or Mr. Depp.** The terms "Plaintiff," "Counterclaim Defendant" and/or "Mr. Depp" refer to Plaintiff/Counterclaim Defendant John C. Depp, II, including his agents, representatives, employees, assigns, and all persons acting on his behalf both individually or as entities.

n. **Requests.** The term "Requests" shall mean the requests for documents to be produced under this Subpoena as set forth in this Attachment.

o. **You and/or Your.** The terms "You" and/or "Your" refer to the recipient of this Subpoena, as well as all persons and entities over which said recipient has "control" as understood by the Rules of this Court.

INSTRUCTIONS

1. Where information in Your possession is requested, such request includes non- privileged information in the possession of Your agent(s), employee(s), assign(s), representative(s), and all others acting on Your behalf.
2. Whenever appropriate, the singular form of a word shall be interpreted as its plural to whatever extent is necessary to bring within the scope of these Topics any information which might otherwise be construed to be outside their scope.
3. Unless otherwise indicated, these Topics refer to the time, place, and circumstances of the occurrences mentioned or complained of in the pleadings in this case.
4. All references to an entity include the entity and its agents, officers, employees, representatives, subsidiaries, divisions, successors, predecessors, assigns, parents, affiliates, and unless privileged, its attorneys and accountants.
5. If You perceive any ambiguities in a question, instruction, definition, or other aspect of these Topics, set forth the matter deemed ambiguous and the construction used in answering.
6. If You assert a claim of privilege as to any of Your responses to the Topics, state the basis for the asserted privilege, specify the privilege claimed, and include in Your answer sufficient information to permit an informed ruling on the claim of privilege. If the claim relates to a privileged document, state the date, person or persons who prepared or participated in preparing the document, the name and address of any person to whom the document was shown or sent, the general subject matter of the document, the present or last known location and custodian of the original of the document, and the basis for the claim of privilege with respect to the document. If the claim of privilege relates to a communication, state the date(s), place(s) and person(s) involved in the communication, the subject matter of the communication, and the basis for the claim of privilege with respect to that communication.
7. If You perceive any Topic to be overly broad, unduly burdensome, or objectionable for any other reason, respond to the fullest extent possible and clearly note any objection so as to permit an informed ruling on the objection.
8. These Topics are continuing in character so as to require You to promptly amend or supplement Your deposition within a reasonable time if You obtain or become aware of any further or contradictory information.

TOPICS FOR CORPORATE DESIGNEE UNDER THIS SUBPOENA

In response to this subpoena, you are required to produce a designee or designees to testify to the following:

1. All information, including all documents, relating to and reflecting any communications between you or anyone on your behalf in connection with your representation of Mr. Depp, and any employee or contractor of the Eastern Columbia Building, during the period May 21, 2016 and present.
2. All information, including all documents, relating to and reflecting any communications between you or anyone on your behalf in connection with your representation of Mr. Depp, and any employee of the Los Angeles Police Department (LAPD), during the period May 21, 2016 and present.
3. All information, including all documents, relating to and reflecting any communications between you or anyone on your behalf in connection with your representation of Mr. Depp, and any potential or actual witness to the relationship between Mr. Depp and Ms. Heard and any acts of abuse or violence, any claim that the allegations were not true, and any other evidence gathered to attempt to impeach the credibility of Ms. Heard, during the period May 21, 2016 to present.
4. All information, including all documents, relating to and reflecting any communications with Mr. Depp that refer or relate to Ms. Heard, including any violence or abuse, attempted act of violence or abuse, any financial issues, post nuptial discussions, and financial analysis and negotiations relating to the parties' divorce settlement.
5. All information, including all documents, relating to and reflecting any communications with Ms. Heard that refer or relate to Mr. Depp.
6. All information identifying and otherwise relating to all documents and communications concerning any actual, alleged, or attempted act of violence involving Mr. Depp.
7. All information relating to all documents and communications concerning any actual, alleged, or attempted alcohol or drug use or abuse by Mr. Depp from 2016 to present.
8. All information, including the identification of who compiled, all of the specific source documents used and relied upon in compiling EWC 1-52, produced in this matter.
9. All information, including explanations, sources and calculations, relating to the numbers reflected in Depp 18508-18594, Depp 18328-18377.

10. All information relating to and reflecting the amounts paid, expected, estimated, forecast, and/or actual value (whether monetary or non-monetary) or any Performance involving Mr. Depp, including but not limited to the key contract terms and compensation with D'ior, Disney, Warner Brothers, and with respect to City of Lies, The Professor, Waiting for the Barbarians, Minamata, and Fantastic Beasts 3.
11. All information relating to the loss of any opportunity, contract, employment, or source of income or value for Mr. Depp (or any person or entity acting on his behalf) in connection with any Performance since January 1, 2016, including the *Pirates of the Caribbean* series of films and any derivative works thereof.
12. All information relating to any insurance policy or claims relating to any Performance by Mr. Depp, including the amount of coverage, whether requested, whether received and if any portion denied, the amount and reasons stated.
13. All information relating to any payments made in relation to any allegations that Mr. Depp committed physical violence or abuse against any person or property from January 1, 2010 through the present.
14. All information identifying and otherwise relating to all non-privileged documents or communications that you have reviewed or intend to rely on in connection with any opinion you intend to offer in your testimony in this action.
15. To the extent not covered in the above paragraphs, all information including identifying all documents and any communications between you or anyone on your behalf, in connection with your representation of Mr. Depp, and any third party, relating in any manner to Mr. Depp or Ms. Heard.
16. To the extent not covered in the above paragraphs, all information you have relating to the claims and defenses raised in the Complaint, Ms. Heard's Answer & Grounds of Defense, Ms. Heard's Counterclaim and Mr. Depp's defenses.
17. All information relating to and reflecting all payments, monetary or otherwise made to Adam Waldman, from January 1, 2016 through the present, including the source of the payments, the nature of the services rendered, and Mr. Waldman's relationship to Mr. Depp and You.

18. All information relating to and reflecting all payments, monetary or otherwise made to any person listed as a person with knowledge, or who has otherwise testified in the divorce proceedings, this matter, the UK litigation, or any other litigation involving Mr. Depp, from January 1, 2016 through the present, including the source of the payments, the nature of the services rendered, and each person's relationship to Mr. Depp and You

<p>ATTORNEY OR PARTY WITHOUT ATTORNEY (Name, State Bar number, and address): Craig J. Mariam (SBN: 225280); John P. Cogger (SBN: 172808)</p> <p>Gordon Rees Scully Mansukhani, LLP 633 West Fifth Street, 52nd Floor Los Angeles, CA 90071</p> <p>TELEPHONE NO.: 213-576-5000 FAX NO. (Optional): 877-306-0043</p> <p>E-MAIL ADDRESS (Optional): cmariam@grsm.com; jcogger@grsm.com</p> <p>ATTORNEY FOR (Name): Amber Laura Heard</p>	<p align="center">FOR COURT USE ONLY</p>
<p><i>Court for county in which discovery is to be conducted:</i></p> <p>SUPERIOR COURT OF CALIFORNIA, COUNTY OF Los Angeles</p> <p>STREET ADDRESS: 111 N. Hill Street</p> <p>MAILING ADDRESS: 111 N. Hill Street</p> <p>CITY AND ZIP CODE: Los Angeles, 90012</p> <p>BRANCH NAME: Stanley Mosk Courthouse</p>	
<p><i>Court in which action is pending:</i></p> <p>Name of Court: Circuit Court of Fairfax County</p> <p>STREET ADDRESS: 4110 Chain Bridge Road</p> <p>MAILING ADDRESS: 4110 Chain Bridge Road</p> <p>CITY, STATE, AND ZIP CODE: Fairfax, VA 22030</p> <p>COUNTRY: United States</p>	
<p>PLAINTIFF/PETITIONER: John C. Depp, II</p> <p>DEFENDANT/RESPONDENT: Amber Laura Heard</p>	<p>CALIFORNIA CASE NUMBER (if any assigned by court): 19STCP04763</p>
<p align="center">DEPOSITION SUBPOENA FOR PERSONAL APPEARANCE IN ACTION PENDING OUTSIDE CALIFORNIA</p>	<p>CASE NUMBER (of action pending outside California): CL-2019-002911</p>

THE PEOPLE OF THE STATE OF CALIFORNIA, TO (name, address, and telephone number of deponent, if known):
Edward White & Co., LLP, c/o Brown Rudnick, LLP, 2211 Michelson Drive, Seventh Floor, Irvine, CA 92612

1. YOU ARE ORDERED TO APPEAR IN PERSON TO TESTIFY AS A WITNESS in the action specified above at the following date, time, and place:

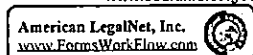
<p>Date: February 17, 2021</p>	<p>Time: 1:00 PM (PDT)</p>	<p>Address: Remote Via Zoom per Judicial Council CA Emergency Rule 11</p>
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- a. As a deponent who is not a natural person, you are ordered to designate one or more persons to testify on your behalf as to the matters described in item 2. (Code Civ. Proc., § 2025.230.)
- b. This deposition will be recorded stenographically through the instant visual display of testimony and by audiotape videotape.
- 2. If the witness is a representative of a business or other entity, the matters upon which the witness is to be examined are as follows:
See Attachment 2

Continued on Attachment 2 (use form MC-025).

3. Attorneys of record in this action or parties without attorneys are (name, address, telephone number, and name of party represented):
See Attachment 3

Continued on Attachment 3 (use form MC-025).



PLAINTIFF/PETITIONER: John C. Depp, II	CASE NUMBER (of action pending outside California): CL-2019-002911
DEFENDANT/RESPONDENT: Amber Laura Heard	

4. Other terms or provisions from out-of-state subpoena, if any (specify):

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

5. At the deposition, you will be asked questions under oath. Questions and answers are recorded stenographically at the deposition; later they are transcribed for possible use at trial. You may read the written record and change any incorrect answers before you sign the deposition. You are entitled to receive witness fees and mileage actually traveled both ways. The money must be paid, at the option of the party giving notice of the deposition, either with service of this subpoena or at the time of the deposition. Unless the court orders or you agree otherwise, if you are being deposed as an individual, the deposition must take place within 75 miles of your residence. The location of the deposition for all deponents is governed by Code of Civil Procedure section 2025.250.

DISOBEDIENCE OF THIS SUBPOENA MAY BE PUNISHED AS CONTEMPT BY THIS COURT. YOU WILL ALSO BE LIABLE FOR THE SUM OF \$500 AND ALL DAMAGES RESULTING FROM YOUR FAILURE TO OBEY.

Date issued: January 21, 2021

Craig J. Mariam

(TYPE OR PRINT NAME)



(SIGNATURE OF PERSON ISSUING SUBPOENA)

Attorney for Amber Laura Heard

(TITLE)

PROOF OF SERVICE OF DEPOSITION SUBPOENA FOR PERSONAL APPEARANCE

1. I served this *Deposition Subpoena for Personal Appearance in Action Pending Outside California* by personally delivering a copy to the person served as follows:

- a. Person served
- b. Address where served:

c. Date of delivery:

d. Time of delivery:

e. Witness fees and mileage both ways (check one):

- (1) were paid. Amount: \$ _____
- (2) were not paid.

(3) were tendered to the witness's public entity employer as required by Government Code section 68097.2. The amount tendered was (specify): \$ _____

f. Fee for service: \$ _____

2. I received this subpoena for service on (date):

3. Person serving:

- a. Not a registered California process server
- b. California sheriff or marshal
- c. Registered California process server
- d. Employee or independent contractor of a registered California process server
- e. Exempt from registration under Business and Professions Code section 22350(b)
- f. Name, address, telephone number, and, if applicable, county of registration and number:

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

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

Date:

Date:





(SIGNATURE)

(SIGNATURE)

SHORT TITLE: John C. Depp, II v. Amber Laura Heard	CASE NUMBER: CL-2019-0002911 .
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ATTACHMENT (Number): 2

(This Attachment may be used with any Judicial Council form.)

DEFINITIONS, INSTRUCTIONS, AND TOPICS

(If the item that this Attachment concerns is made under penalty of perjury, all statements in this

Page _____ of _____

Attachment are made under penalty of perjury.)

(Add pages as required)

ATTACHMENT

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

DEFINITIONS

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circulars, press releases, financial statements, calendars, diaries, trip reports, etc. A draft of a non-identical copy is a separate document within the meaning of this term.

l. **Engaged.** The term "Engaged," in relation to a person (as defined herein), means contracted, directed, hired, retained, formed an agreement with (whether formal or informal, binding or nonbinding, written or oral), and/or procured the services of, whether or not in exchange for remuneration or other valuable consideration.

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m. **Plaintiff, Counterclaim Defendant and/or Mr. Depp.** The terms "Plaintiff," "Counterclaim Defendant" and/or "Mr. Depp" refer to Plaintiff/Counterclaim Defendant John C. Depp, II, including his agents, representatives, employees, assigns, and all persons acting on his behalf both individually or as entities.

n. **Requests.** The term "Requests" shall mean the requests for documents to be produced under this Subpoena as set forth in this Attachment.

o. **You and/or Your.** The terms "You" and/or "Your" refer to the recipient of this Subpoena, as well as all persons and entities over which said recipient has "control" as understood by the Rules of this Court.

INSTRUCTIONS

1. Where information in Your possession is requested, such request includes non-privileged information in the possession of Your agent(s), employee(s), assign(s), representative(s), and all others acting on Your behalf.
2. Whenever appropriate, the singular form of a word shall be interpreted as its plural to whatever extent is necessary to bring within the scope of these Topics any information which might otherwise be construed to be outside their scope.
3. Unless otherwise indicated, these Topics refer to the time, place, and circumstances of the occurrences mentioned or complained of in the pleadings in this case.
4. All references to an entity include the entity and its agents, officers, employees, representatives, subsidiaries, divisions, successors, predecessors, assigns, parents, affiliates, and unless privileged, its attorneys and accountants.
5. If You perceive any ambiguities in a question, instruction, definition, or other aspect of these Topics, set forth the matter deemed ambiguous and the construction used in answering.
6. If You assert a claim of privilege as to any of Your responses to the Topics, state the basis for the asserted privilege, specify the privilege claimed, and include in Your answer sufficient information to permit an informed ruling on the claim of privilege. If the claim relates to a privileged document, state the date, person or persons who prepared or participated in preparing the document, the name and address of any person to whom the document was shown or sent, the general subject matter of the document, the present or last known location and custodian of the original of the document, and the basis for the claim of privilege with respect to the document. If the claim of privilege relates to a communication, state the date(s), place(s) and person(s) involved in the communication, the subject matter of the communication, and the basis for the claim of privilege with respect to that communication.
7. If You perceive any Topic to be overly broad, unduly burdensome, or objectionable for any other reason, respond to the fullest extent possible and clearly note any objection so as to permit an informed ruling on the objection.
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TOPICS FOR CORPORATE DESIGNEE UNDER THIS SUBPOENA

In response to this subpoena, you are required to produce a designee or designees to testify to the following:

1. All information, including all documents, relating to and reflecting any communications between you or anyone on your behalf in connection with your representation of Mr. Depp, and any employee or contractor of the Eastern Columbia Building, during the period May 21, 2016 and present.
2. All information, including all documents, relating to and reflecting any communications between you or anyone on your behalf in connection with your representation of Mr. Depp, and any employee of the Los Angeles Police Department (LAPD), during the period May 21, 2016 and present.
3. All information, including all documents, relating to and reflecting any communications between you or anyone on your behalf in connection with your representation of Mr. Depp, and any potential or actual witness to the relationship between Mr. Depp and Ms. Heard and any acts of abuse or violence, any claim that the allegations were not true, and any other evidence gathered to attempt to impeach the credibility of Ms. Heard, during the period May 21, 2016 to present.
4. All information, including all documents, relating to and reflecting any communications with Mr. Depp that refer or relate to Ms. Heard, including any violence or abuse, attempted act of violence or abuse, any financial issues, post nuptial discussions, and financial analysis and negotiations relating to the parties' divorce settlement.
5. All information, including all documents, relating to and reflecting any communications with Ms. Heard that refer or relate to Mr. Depp.
6. All information identifying and otherwise relating to all documents and communications concerning any actual, alleged, or attempted act of violence involving Mr. Depp.
7. All information relating to all documents and communications concerning any actual, alleged, or attempted alcohol or drug use or abuse by Mr. Depp from 2016 to present.
8. All information, including the identification of who compiled, all of the specific source documents used and relied upon in compiling EWC 1-52, produced in this matter.
9. All information, including explanations, sources and calculations, relating to the numbers reflected in Depp 18508-18594, Depp 18328-18377.

10. All information relating to and reflecting the amounts paid, expected, estimated, forecast, and/or actual value (whether monetary or non-monetary) or any Performance involving Mr. Depp, including but not limited to the key contract terms and compensation with D'ior, Disney, Warner Brothers, and with respect to City of Lies, The Professor, Waiting for the Barbarians, Minamata, and Fantastic Beasts 3.
11. All information relating to the loss of any opportunity, contract, employment, or source of income or value for Mr. Depp (or any person or entity acting on his behalf) in connection with any Performance since January 1, 2016, including the *Pirates of the Caribbean* series of films and any derivative works thereof.
12. All information relating to any insurance policy or claims relating to any Performance by Mr. Depp, including the amount of coverage, whether requested, whether received and if any portion denied, the amount and reasons stated.
13. All information relating to any payments made in relation to any allegations that Mr. Depp committed physical violence or abuse against any person or property from January 1, 2010 through the present.
14. All information identifying and otherwise relating to all non-privileged documents or communications that you have reviewed or intend to rely on in connection with any opinion you intend to offer in your testimony in this action.
15. To the extent not covered in the above paragraphs, all information including identifying all documents and any communications between you or anyone on your behalf, in connection with your representation of Mr. Depp, and any third party, relating in any manner to Mr. Depp or Ms. Heard.
16. To the extent not covered in the above paragraphs, all information you have relating to the claims and defenses raised in the Complaint, Ms. Heard's Answer & Grounds of Defense, Ms. Heard's Counterclaim and Mr. Depp's defenses.
17. All information relating to and reflecting all payments, monetary or otherwise made to Adam Waldman, from January 1, 2016 through the present, including the source of the payments, the nature of the services rendered, and Mr. Waldman's relationship to Mr. Depp and You.

18. All information relating to and reflecting all payments, monetary or otherwise made to any person listed as a person with knowledge, or who has otherwise testified in the divorce proceedings, this matter, the UK litigation, or any other litigation involving Mr. Depp, from January 1, 2016 through the present, including the source of the payments, the nature of the services rendered, and each person's relationship to Mr. Depp and You

SHORT TITLE: Depp v. Heard	CASE NUMBER: CL-2019-0002911 .
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ATTACHMENT (Number): 3

(This Attachment may be used with any Judicial Council form.)

(If the item that this Attachment concerns is made under penalty of perjury, all statements in this Attachment are made under penalty of perjury.)

(Add pages as required)

1070666/2436940

SERVICE LIST

John C. Depp II v. Amber Heard
Case No.: CL-2019-0002911 .

<p>Benjamin G. Chew, Esq. Elliot J. Weingarten, Esq. Andrew C. Crawford, Esq. BROWN RUDNICK LLP 601 Thirteenth Street, N.W. Washington, D.C. 20005 Tel: 202-536-1700; Fax: 202-536-1701 bchew@brownrudnick.com eweingarten@brownrudnick.com acrawford@brownrudnick.com</p> <p>Camille M. Vasquez, Esq. Leo J. Preciado, Esq. Ronald Rus, Esq. Samuel A. Moniz, Esq. BROWN RUDNICK LLP 2211 Michelson Drive Irvine, CA 92612 Tel: 949-752-7100; Fax 949-252-1514 cvasquez@brownrudnick.com lpresiado@brownrudnick.com rrus@brownrudnick.com smoniz@brownrudnick.com</p> <p>Robert Gilmore, Esq. Kevin Attridge, Esq. STEIN MITCHELL BEATO & MISSNER LLP 901 Fifteenth Street, N.W., Suite 700 Washington, D.C. 20005 Tel: 202-601-1589; Fax: 202-296-8312 rgilmore@steinmitchell.com kattridge@steinmitchell.com</p>	<p><i>Attorneys for Plaintiff JOHN C. DEPP, II</i></p>
<p>J. Benjamin Rottenborn, Esq. Joshua R. Treece, Esq. WOODS ROGERS PLC 10. S Jefferson Street, Suite 1400 P.O. Box 14125 Roanoke, Virginia 24011 Tel: 540-983-7540 Email: brottenborn@woodsrogers.com jtreece@woodsrogers.com</p>	<p><i>Attorneys for Defendant Amber Heard</i></p>
<p>Elaine Charlson Bredehoft, Esq. Carla D. Brown, Esq. Adam S. Nadelhaft, Esq. David E. Murphy, Esq. Charlson Bredehoft Cohen & Brown, P.C.</p>	<p><i>Attorneys for Defendant Amber Heard</i></p>

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11260 Roger Bacon Drive, Suite 201 Reston, VA 20190 Tel: 703-318-6800 Mobile: 703-919-2735 Fax: 703-318-6808 Email: ebredehft@charlsonbredehft.com cbrown@cbcblaw.com anadelhaft@cbcblaw.com dmurphy@cbcblaw.com	
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SHORT TITLE: Depp v. Heard	CASE NUMBER: CL-2019-0002911 .
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ATTACHMENT (Number): 4

(This Attachment may be used with any Judicial Council form.)

Due to the ongoing COVID-19 pandemic, the deposition will be taken by audio-video conference, via a link to be provided, pursuant to Code of Civil Procedure §§ 2025.220 and 2025.330. If requested, the deponent need not be physically present with the deposition officer at the time of the deposition. (Judicial Council of California Emergency Rule 11 [April 6, 2020].) Counsel for all parties and their clients will be able to participate from various separate locations. This deposition will be taken before a certified shorthand reporter who is authorized to administer an oath in accordance with the provisions of California Code of Civil Procedure § 2025.010, et seq.

The deposition may also be videotaped and audiotaped for use as evidence in this action, at trial, or for such other purposes as are permitted, as authorized by Code of Civil Procedure § 2025.340 and any applicable Virginia law.

The deposition testimony may also be recorded through Summation, an instant visual display of the testimony, of which a rough draft of the testimony will be requested, as authorized by Code of Civil Procedure § 2025.340. If the deposition is not completed on the date set forth above, the taking of the deposition will be continued from day to day thereafter, except for Saturdays, Sundays and holidays, until completed.

(If the item that this Attachment concerns is made under penalty of perjury, all statements in this Attachment are made under penalty of perjury.)

(Add pages as required)

VIRGINIA:

IN THE CIRCUIT COURT OF FAIRFAX COUNTY

JOHN C. DEPP, II,

Plaintiff and Counter-defendant,

v.

AMBER LAURA HEARD,

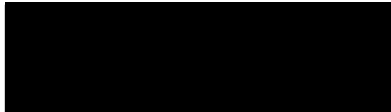
Defendant and Counter-plaintiff.

Civil Action No.: CL-2019-0002911

CERTIFICATE OF COUNSEL

This is to certify that I caused a true and accurate copy of the enclosed Deposition Subpoena for Personal Appearance in Action Pending Outside California to be sent by email this 21st day of January, 2021.

January 21, 2021



Elaine Charlson Bredehoff (VSB No. 23766)
Adam S. Nadelhaft (VSB No. 91717)
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jtreece@woodsrogers.com
*Counsel to Defendant/Counterclaim
Plaintiff Amber Laura Heard*

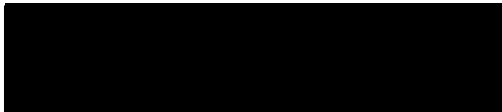
CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing was served this 21st Day of January, by email, by agreement of the parties, addressed as follows:

Benjamin G. Chew, Esq.
Andrew C. Crawford, Esq.
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ALSO ADMITTED IN D.C.
◊ ALSO ADMITTED IN MARYLAND
◊ ALSO ADMITTED IN MASSACHUSETTS
% ALSO ADMITTED IN NEW YORK
◊ ALSO ADMITTED IN WISCONSIN
◊ ONLY ADMITTED IN MARYLAND

January 21, 2021

FILED
CIVIL INTAKE
2021 JAN 21 PM 1:32
JOHN T. FREY
CLERK, CIRCUIT COURT
FAIRFAX, VA

BY MESSENGER

John T. Frey, Clerk
Fairfax County Circuit Court
4110 Chain Bridge Road, 3rd Floor
Fairfax, VA 22030

Re: *Case No. CL-2019-0002911 – John C. Depp, II v. Amber Laura Heard*

Dear Mr. Frey:

Enclosed for filing in the above referenced matter, please find four copies of Defendant's Certificate of Counsel and corresponding subpoena issued pursuant to Virginia Code Section 8.01-412.10, and California Civil Procedure Code Section 2029.100 (collectively, "Acts"). The enclosed Subpoenas Duces Tecum to Person Under Foreign Subpoena have been issued in accordance with both Acts and the reciprocal privileges included therein.

The enclosed document will be served by private process server, and affidavit of service will be filed as necessary. Please return a file stamped copy of the same via the awaiting messenger.

Please also find a check in the amount of \$35, made payable to the Clerk, Fairfax Circuit Court, for the filing fee.

Thank you very much for your assistance.

Very truly yours,

Elaine Charlson Bredehoff

Enclosures