

[] 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: <u>Laura Divenere</u>	
ADDRESS: <u>c/o Lee A. Sherman, Callahan Thompson Sherman & Caudill LLP</u> <u>2601 Main Street, Suite 800, Irvine, CA 92614</u>	
<input type="checkbox"/> PERSONAL SERVICE	Tel. No. _____
Being unable to make personal service, a copy was delivered in the following manner:	
<input type="checkbox"/> Delivered to family member (not temporary sojourner or guest) age 16 or older at usual place of abode of party named above after giving information of its purport. List name, age of recipient, and relation of recipient to party named above: _____ _____	
<input type="checkbox"/> Posted on front door or such other door as appears to be the main entrance of usual place of abode, address listed above. (Other authorized recipient not found.)	
<input type="checkbox"/> not found	_____, Sheriff
_____ DATE	by _____, Deputy Sheriff

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

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

File No. CL-2019-0002911

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

FAIRFAX COUNTY

Circuit Court

4110 CHAIN BRIDGE ROAD, FAIRFAX, VIRGINIA 22030

ADDRESS OF COURT

JOHN C. DEPP, II

v./In re:

AMBER LAURA HEARD

TO THE PERSON AUTHORIZED BY LAW TO SERVE THIS PROCESS:

You are commanded to summon

Laura Divenere

NAME

c/o Lee A. Sherman, Callahan Thompson Sherman & Caudill LLP, 2601 Main Street, Suite 800

STREET ADDRESS

Irvine

CA

92614

CITY

STATE

ZIP

TO THE PERSON SUMMONED: You are commanded to

attend and give testimony at a deposition

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

See attachment A

FILED
CIVIL DIVISION
2020 MAY 23 AM 10:57
JOHN T. FREY
CLERK-CIRCUIT COURT
FAIRFAX, VA

at Brown Rudnick LLP, 2211 Michelson Dr., Irvine, CA 92612 at April 20, 2020 at 10:00 a.m.

LOCATION

DATE AND TIME

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

permit inspection of the premises

at the following location

LOCATION

ON

DATE AND TIME

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

John C. Depp, II

NAME OF REQUESTING PARTY

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

STREET ADDRESS

Washington

DC

20005

(202) 536-1700

CITY

STATE

ZIP

TELEPHONE NUMBER

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

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

April 2, 2020
DATE ISSUED

JOHN T. FREY, CLERK

by



Benjamin G. Chew

NAME OF ATTORNEY



29113

BAR NUMBER

VA

LICENSING STATE

601 Thirteenth Street, N.W., Suite 600

OFFICE ADDRESS

(202) 536-1700

TELEPHONE NUMBER OF ATTORNEY

Washington, DC 20005

OFFICE ADDRESS

(202) 536-1701

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)

1 **ATTACHMENT A**

2 **DEFINITIONS**

3 1. "YOU" and/or "YOUR" shall mean and refer to Laura Divenere.

4 2. "COMMUNICATION" and/or "COMMUNICATIONS" shall mean and refer to
5 any written and verbal exchanges between any person or persons or entities, including but not
6 limited to verbal conversations, telephone calls, letters, e-mails, memoranda, reports, telegraphs,
7 faxes, exhibits, drawings, text messages, and any other documents which confirm or relate to the
8 written or verbal exchange, including applicable ELECTRONICALLY STORED
9 INFORMATION.

10 3. "ELECTRONICALLY STORED INFORMATION" means data that is stored in an
11 electronic medium and shall include, by way of example only, computer programs, electronic mail
12 (including message contents, header information and logs of electronic mail usage), output
13 resulting from the use of any software program, including electronic, digital, or any other recorded
14 material whatsoever, including but not limited to, any notes, memoranda, videotapes, affidavits,
15 statements, papers, files, forms, data, tapes, printouts, letters, reports, communications, contracts,
16 agreements, telegrams, records, financial records, applications, correspondence, diaries, calendars,
17 recordings and transcriptions of recordings, voice mail messages recorded electronically and in
18 writing, email messages and printouts, photographs, diagrams, or any other writings, however
19 produced or reproduced, word processing documents, spreadsheets, databases, telephone logs,
20 contact manager information, Internet usage files, PDF files, .JPG files, .TIF files, .TXT files,
21 batch files, ASCII files, and any and all miscellaneous files and data and shall include all active
22 data, deleted data, file fragments, metadata, native file formats and forensic images thereof.

23 4. "DOCUMENT" and/or "DOCUMENTS" unless otherwise indicated, are used in
24 their customarily broad sense and shall refer to and mean all writings and other tangible things of
25 any nature whatsoever, and shall include, but not be limited to, all writings (or drafts thereof),
26 medical records, drawings, graphs, charts, photographs, phone records, other data compilations or
27 storage devices from which information can be obtained (even if such information must be
28 translated into a reasonably usable form), magnetically recorded or stored information generated

1 by a computer, contracts, agreements, communications, correspondence, telegrams, memoranda,
2 records, reports, books, summaries or records of telephone conversations, summaries or records of
3 personal conversations or interviews, diaries, forecasts, statistical statements, work papers, drafts,
4 accounts, analytical records, minutes or records of meetings or conferences, records, reports or
5 summaries of negotiations, brochures, pamphlets, circulars, calendars, notes, marginal notations,
6 bills, invoices, checks, lists, journals, advertising, and all other written, printed, recorded or
7 photographic matter or sound reproductions, or tangible representations of things, however
8 produced or reproduced, including ELECTRONICALLY STORED INFORMATION and all
9 nonidentical copies of the foregoing.

10 5. "RELATING TO" means, without limitation, constituting, containing, showing,
11 reflecting, discussing, concerning, commenting upon, mentioning, evidencing, quoting,
12 describing, or referencing in any way, directly or indirectly.

13 6. "MR. DEPP" means and refers to John C. Depp, II.

14 7. "MS. HEARD" means and refers to Amber Laura Heard.

15 INSTRUCTIONS

16 8. When necessary, the singular form of a word shall be interpreted as plural, and the
17 masculine gender shall be deemed to include the feminine, in order to bring within the scope any
18 DOCUMENTS which might otherwise be construed to be outside the scope of these Requests.
19 The terms, "and" and "or," have both conjunctive and disjunctive meanings, and "each," "any,"
20 and "all" mean "each and every."

21 9. All undefined terms shall be interpreted according to their plain and commonsense
22 meaning.

23 10. DOCUMENTS should be produced as single page .tiff format files imaged at 300
24 dpi, with the exception of stand-alone Databases (e.g., Access), spreadsheets (e.g., Excel), slide
25 presentations (e.g., PowerPoint), video files, and audio files, which should be produced in native
26 format. Each .tiff file should have a unique name matching the Bates number labeled on the
27 corresponding page. Color DOCUMENTS should be produced in color.

28 11. DOCUMENTS should be produced with (a) a delimited data file (.dat), and (b) an

1 image load file (.opt and/or .lfp). Each .tiff in a production must be referenced in the
 2 corresponding image load file. The total number of documents referenced in a production's data
 3 load file should match the total number of designated document breaks in the image load file for
 4 the production.

5 12. DOCUMENTS should be produced with extracted metadata for each DOCUMENT
 6 in the form of a .dat file. The metadata should include the following fields, to the extent such
 7 fields are available in the original DOCUMENT as it originally existed in its native format:

Bates_Begin	The bates label of the first page of the document
Bates_End	The bates label of the last page of the document
Attach_Begin	The bates label of the first page of a family of documents (e.g., email and attachment)
Attach_End	The bates label of the last page of a family of documents
Sent_Date	For email, the sent date of the message
Sent_Time	For email, the sent time of the message converted to GMT
Email_Author	The sender of an email message (email FROM)
Recipient	The recipients of an email message (email TO)
CC	The recipients of a copy of an email message (email CC)
BCC	The recipients of a blind copy of an email message (email BCC)
Custodian	The custodian in whose file the document was found, including all duplicate custodians
Datercvd	Date received

1	Datesent	Date sent
2	Subject	E-mail subject
3	Author	The person who created the document
4	Modifier	The person who last modified the document
5	Created	The creation date of the document
6	Last_Modified	The last modified date of the document
7	Title	The title of the document
8	File_Name	The name of the file
9	File_Extension	The file extension of the document
10	MD5Hash	The MD5 Hash Value of the document
11	Message_ID	The Message ID of the email and/or attachment
12	Mailstore	The name of the Mailstore in which the email and/or attachment is contained
13	File_Size	The size of the file
14	File_Path	Original file path of the document as it existed in the normal course of business or the folder location if the document/email is contained in a Mailstore
15	Number_Pages	The number of pages in the document

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13. All DOCUMENTS attached to and/or embedded in an e-mail and/or other DOCUMENT must be produced contemporaneously and sequentially after the parent e-mail/document.

14. In producing DOCUMENTS, you shall furnish all DOCUMENTS in your possession, custody, or control. Without limitation of the term "control," a DOCUMENT is

1 deemed to be in your control if you have the right to secure the DOCUMENT or a copy thereof
2 from another person or public or private entity having actual possession thereof, or if you have the
3 practical ability to obtain the DOCUMENT from a third-party, irrespective of any legal
4 entitlement to the DOCUMENT. If any original DOCUMENT requested is not in your possession,
5 custody, or control, then you are required to produce the best available copy, and to state, to the
6 best of your knowledge, the name and address of the person in possession and/or control of the
7 original. The fact that a DOCUMENT is in possession of another person or entity does not relieve
8 you of the obligation to produce your copy of the DOCUMENT, even if the two DOCUMENTS
9 are identical. In addition, any copy of a DOCUMENT shall be produced if it differs in any respect
10 from the original (e.g., by reason of handwritten notes or comments having been added to copy
11 which do not appear on the original or otherwise).

12 15. If responsive DOCUMENTS no longer exist because they have been destroyed,
13 cannot be located, or are otherwise no longer in your possession or subject to your control,
14 identify each DOCUMENT and describe the circumstances under which it was lost or destroyed.

15 16. All DOCUMENTS should be organized and labeled to correspond by number with
16 the numbered categories set forth in these Requests. If a DOCUMENT is responsive to more than
17 one Request, reference that DOCUMENT in your written response to each Request to which it is
18 responsive or in a load file identifying the same.

19 17. A Request for a DOCUMENT shall be deemed to include a request for any and all
20 file folders within which the DOCUMENT was contained, transmittal sheets, cover letters,
21 exhibits, enclosures, or attachments to the DOCUMENT in addition to the DOCUMENT itself.

22 18. If you claim that any DOCUMENT is, in whole or in part, beyond the scope of
23 permissible discovery (including but not limited to any claim of privilege or confidentiality),
24 specify in detail each and every ground on which such claim rests and identify generally what the
25 document is. If you assert any claim of privilege, then at the time of production you are to furnish
26 a privilege log that specifically identifies each DOCUMENT (or portion) withheld by (a) date, (b)
27 author, (c) recipient, (d) persons copied, (e) general description of the subject matter of the
28 DOCUMENT, and (f) a statement of the specific privilege claimed and the basis upon which such

1 privilege is claimed as to each separate DOCUMENT (or portion) withheld. The privilege log
2 should contain enough specificity, but without disclosing privileged information, to allow
3 Plaintiffs and the Court to adequately assess the privilege claimed.

4 19. To the extent you consider any portion of the following Requests to be
5 objectionable, (a) identify the portion of the Request claimed to be objectionable, (b) state the
6 nature and basis of the objection, and (c) produce DOCUMENTS responsive to any portion of
7 such Request that is not claimed to be objectionable.

8 20. If you believe that any Request is unclear, unintelligible, or because of its wording
9 otherwise prevents you from responding fully to that Request, identify the ambiguity or source of
10 confusion and explain the definition and understanding that you relied upon in responding. It shall
11 be insufficient to object to a particular Request on the grounds that it is vague, ambiguous, or
12 otherwise unclear, and withhold DOCUMENTS on that basis without seeking clarification.

13 DOCUMENT REQUESTS

14 REQUEST NO. 1:

15 All DOCUMENTS and COMMUNICATIONS YOU reviewed and/or relied upon in
16 preparation for YOUR deposition.

17 REQUEST NO. 2:

18 All DOCUMENTS and all COMMUNICATIONS by and between YOU and any
19 PERSON, including but not limited to MS. HEARD, RELATING TO the purported incident in
20 Los Angeles, California in late 2012 or early 2013, involving MR. DEPP and MS. HEARD.

21 REQUEST NO. 3:

22 All DOCUMENTS and all COMMUNICATIONS by and between YOU and any
23 PERSON, including but not limited to MS. HEARD, RELATING TO the purported incident in
24 Los Angeles, California on March 8, 2013, involving MR. DEPP and MS. HEARD.

25 REQUEST NO. 4:

26 All DOCUMENTS and all COMMUNICATIONS by and between YOU and any
27 PERSON, including but not limited to MS. HEARD, RELATING TO the purported incident
28 occurring on a flight from Boston, Massachusetts to Los Angeles, California on or about May 24,

1 2014, involving MR. DEPP and MS. HEARD.

2 **REQUEST NO. 5:**

3 All DOCUMENTS and all COMMUNICATIONS by and between YOU and any
4 PERSON, including but not limited to MS. HEARD, RELATING TO the purported incident in the
5 Bahamas on August 17, 2014, involving MR. DEPP and MS. HEARD.

6 **REQUEST NO. 6:**

7 All DOCUMENTS and all COMMUNICATIONS by and between YOU and any
8 PERSON, including but not limited to MS. HEARD, RELATING TO the purported incident in
9 Los Angeles on December 17, 2014, involving MR. DEPP and MS. HEARD.

10 **REQUEST NO. 7:**

11 All DOCUMENTS and all COMMUNICATIONS by and between YOU and any
12 PERSON, including but not limited to MS. HEARD, RELATING TO the purported incident
13 taking place in a hotel room in Tokyo, Japan on January 25, 2015, involving MR. DEPP and MS.
14 HEARD.

15 **REQUEST NO. 8:**

16 All DOCUMENTS and all COMMUNICATIONS by and between YOU and any
17 PERSON, including but not limited to MS. HEARD, RELATING TO the purported incident in
18 Australia on March 3 through March 5, 2015, involving MR. DEPP and MS. HEARD.

19 **REQUEST NO. 9:**

20 All DOCUMENTS and all COMMUNICATIONS by and between YOU and any
21 PERSON, including but not limited to MS. HEARD, RELATING TO the purported incident in
22 Los Angeles, California in March 2015, involving MR. DEPP and MS. HEARD.

23 **REQUEST NO. 10:**

24 All DOCUMENTS and all COMMUNICATIONS by and between YOU and any
25 PERSON, including but not limited to MS. HEARD, RELATING TO the purported incident in
26 Thailand and/or Malaysia in August 2015, involving MR. DEPP and MS. HEARD.

27 **REQUEST NO. 11:**

28 All DOCUMENTS and all COMMUNICATIONS by and between YOU and any

1 PERSON, including but not limited to MS. HEARD, RELATING TO the purported incident in
2 Los Angeles, California on November 26, 2015, involving MR. DEPP and MS. HEARD.

3 **REQUEST NO. 12:**

4 All DOCUMENTS and all COMMUNICATIONS by and between YOU and any
5 PERSON, including but not limited to MS. HEARD, RELATING TO the purported incident in
6 Los Angeles, California on December 15, 2015, involving MR. DEPP and MS. HEARD.

7 **REQUEST NO. 13:**

8 All DOCUMENTS and all COMMUNICATIONS by and between YOU and any
9 PERSON, including but not limited to MS. HEARD, RELATING TO the purported incident in
10 Los Angeles, California on April 21, 2016, involving MR. DEPP and MS. HEARD.

11 **REQUEST NO. 14:**

12 All DOCUMENTS and all COMMUNICATIONS by and between YOU and any
13 PERSON, including but not limited to MS. HEARD, RELATING TO the purported incident in
14 Los Angeles, California on May 21, 2016, involving MR. DEPP and MS. HEARD.

15 **REQUEST NO. 15:**

16 All DOCUMENTS concerning YOUR in-person interactions with MR. DEPP on or
17 around May 21, 2016.

18 **REQUEST NO. 16:**

19 All DOCUMENTS and all COMMUNICATIONS by and between YOU and any
20 PERSON, including but not limited to MS. HEARD, RELATING TO the purported injuries that
21 appeared on MS. HEARD'S face on May 27, 2016, including any COMMUNICATIONS
22 RELATING TO how MS. HEARD came to have those purported injuries on her face on May 27,
23 2016.

24 **REQUEST NO. 17:**

25 All DOCUMENTS and all COMMUNICATIONS by and between YOU and any
26 PERSON, including but not limited to MS. HEARD, RELATING TO any other domestic abuse
27 incidents in which MS. HEARD assaulted MR. DEPP:

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1 **REQUEST NO. 18:**

2 All DOCUMENTS and all COMMUNICATIONS by and between YOU and any
3 PERSON, including but not limited to MS. HEARD, RELATING TO the incident between MS.
4 HEARD and Tasya van Ree that occurred at the Seattle-Tacoma International Airport on
5 September 14, 2009, which prompted MS. HEARD's arrest.

6 **REQUEST NO. 19:**

7 All DOCUMENTS and all COMMUNICATIONS by and between YOU and any
8 PERSON, including but not limited to MS. HEARD, RELATING TO any other domestic abuse
9 allegations against MR. DEPP not identified in Request Nos. 2 through 17.

10 **REQUEST NO. 20:**

11 All DOCUMENTS and all COMMUNICATIONS by and between YOU and any
12 PERSON, including but not limited to MS. HEARD, RELATING TO MS. HEARD'S relationship
13 with Elon Musk.

14 **REQUEST NO. 21:**

15 All DOCUMENTS and all COMMUNICATIONS by and between YOU and any
16 PERSON, including but not limited to MS. HEARD, RELATING TO MS. HEARD requesting
17 Ms. Trinity Esparza and Mr. Brandon Patterson of the Eastern Columbia Building to give a
18 statement to *People Magazine* about one week after MS. HEARD made her domestic abuse
19 allegations against MR. DEPP on May 27, 2016.

20 **REQUEST NO. 22:**

21 All DOCUMENTS concerning the affidavit that MS. HEARD submitted to obtain a
22 temporary restraining order against MR. DEPP, including but not limited to drafts of the same.

23 **REQUEST NO. 23:**

24 All COMMUNICATIONS by and between YOU and any PERSON, including but not
25 limited to MS. HEARD, concerning the affidavit that MS. HEARD submitted to obtain a
26 temporary restraining order against MR. DEPP.

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1 **REQUEST NO. 24:**

2 All DOCUMENTS and all COMMUNICATIONS by and between YOU and any
3 PERSON, including but not limited to MS. HEARD, RELATING TO YOUR in-person
4 interactions with MS. HEARD on or around the days after May 21, 2016.

5 **REQUEST NO. 25:**

6 All DOCUMENTS and all COMMUNICATIONS by and between YOU and any
7 PERSON, including but not limited to MS. HEARD, RELATING TO all draft versions and final
8 declarations or witness statements YOU have given in relation to any legal proceeding involving
9 MS. HEARD or MR. DEPP, including but not limited to, the current litigation for which YOU are
10 being deposed.

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ATTORNEY OR PARTY WITHOUT ATTORNEY (Name, State Bar number, and address): BROWN RUDNICK LLP CAMILLE M. VASQUEZ, #273377 2211 Michelson Drive, Seventh Floor Irvine, CA 92612 TELEPHONE NO.: (949) 752-7100 FAX NO.: (949) 252-1514 E-MAIL ADDRESS: cvasquez@brownrudnick.com ATTORNEY FOR (Name): John C. Depp, II	FOR COURT USE ONLY
Court for county in which discovery is to be conducted: SUPERIOR COURT OF CALIFORNIA, COUNTY OF LOS ANGELES STREET ADDRESS: 111 N. Hill Street MAILING ADDRESS: 111 N. Hill Street CITY AND ZIP CODE: Los Angeles 90012 BRANCH NAME: Stanley Mosk	
Court in which action is pending: Name of Court: Circuit Court of Fairfax County STREET ADDRESS: 4110 Chain Bridge Road MAILING ADDRESS: 4110 Chain Bridge Road, Suite 320 CITY, STATE, AND ZIP CODE: Fairfax, Virginia 22030 COUNTRY: United States	
PLAINTIFF/PETITIONER: John C. Depp, II DEFENDANT/RESPONDENT: Amber Laura Heard	CALIFORNIA CASE NUMBER (if any assigned by court):
DEPOSITION SUBPOENA FOR PERSONAL APPEARANCE AND PRODUCTION OF DOCUMENTS, ELECTRONICALLY STORED INFORMATION, AND THINGS IN ACTION PENDING OUTSIDE CALIFORNIA	CASE NUMBER (of action pending outside California): CL-2019-0002911

THE PEOPLE OF THE STATE OF CALIFORNIA, TO (name, address, and telephone number of deponent, if known):

Laura Divenere c/o Lee A. Sherman, Callahan Thompson Sherman & Caudill LLP
 2601 Main Street, Suite 800, Irvine, CA 92614

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

Date: April 20, 2020	Time: 10:00 a.m.	Address: Brown Rudnick, 2211 Michelson Dr., 7th Floor, Irvine, CA 92612
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- a. As a deponent who is not a natural person, you are ordered to designate one or more persons to testify on your behalf as to the matters described in item 4. (Code Civ. Proc., § 2025.230.)
- b. You are ordered to produce the documents, electronically stored information, and things described in item 3.
- c. This deposition will be recorded stenographically through the instant visual display of testimony and by audiotape videotape.
2. The personal attendance of the custodian or other qualified witness and the production of the original records are required by this subpoena. The procedure authorized by Evidence Code sections 1560(b), 1561, and 1562 will not be deemed sufficient compliance with this subpoena.
3. The documents, electronically stored information, and things to be produced and any testing or sampling being sought are described as follows ((if electronically stored information is required, the form or forms in which each type of information is to be produced may be specified) : See Attachment 3
- Continued on Attachment 3 (use form MC-025).
4. If the witness is a representative of a business or other entity, the matters upon which the witness is to be examined are described as follows:
- Continued on Attachment 4 (use form MC-025).
5. Attorneys for the parties to this action or parties without attorneys are (name, address, telephone number, and name of party represented): See Attachment 5
- Continued on Attachment 5 (use form MC-025).

PLAINTIFF/PETITIONER: John C. Depp, II	CASE NUMBER: CL-2019-0002911
DEFENDANT/RESPONDENT: Amber Laura Heard	

6. Other terms or provisions from out-of-state subpoena, if any (specify):
See Attachment 6

Continued on Attachment 6 (use form MC-025).

7. If you have been served with this subpoena as a custodian of consumer or employee records under Code of Civil Procedures section 1985.3 or 1985.6 and a motion to quash or an objection has been served on you, a court order or agreement of the parties, witnesses, and consumer or employee affected must be obtained before you are required to produce consumer or employee records.

8. 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: March 20, 2020



CAMILLE M. VASQUEZ

Attorney for John C. Depp, II

(TYPE OR PRINT NAME)

(TITLE)

PROOF OF SERVICE OF DEPOSITION SUBPOENA FOR PERSONAL APPEARANCE AND PRODUCTION OF DOCUMENTS, ELECTRONICALLY STORED INFORMATION, AND THINGS

1. I served this Deposition Subpoena for Personal Appearance and Production of Documents, Electronically Stored Information, and Things in Action Pending Outside California by personally delivering a copy to the person served as follows:

a. Person served (name):

b. Address where served:

c. Date of delivery:

d. Time of delivery:

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

(1) were paid. Amount: \$ _____

(2) were not paid.

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

f. Fee for service:\$ _____

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

3. I also served a completed Proof of Service of Notice to Consumer or Employee and Objection (form SUBP-025) by personally delivering a copy to the person served as described in 1 above.

4. Person serving:

a. Not a registered California process server

b. California sheriff or marshal

c. Registered California process server

d. Employee or independent contractor of a registered California process server

e. Exempt from registration under Business and Professions Code section 22350(b)

f. Name, address, telephone number, and, if applicable, county of registration and number:

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

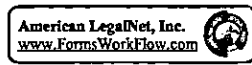
Date:

(SIGNATURE)

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

Date:

(SIGNATURE)



1 ATTACHMENT 3

2 DEFINITIONS

3 1. "YOU" and/or "YOUR" shall mean and refer to Laura Divenere.

4 2. "COMMUNICATION" and/or "COMMUNICATIONS" shall mean and refer to
5 any written and verbal exchanges between any person or persons or entities, including but not
6 limited to verbal conversations, telephone calls, letters, e-mails, memoranda, reports, telegraphs,
7 faxes, exhibits, drawings, text messages, and any other documents which confirm or relate to the
8 written or verbal exchange, including applicable ELECTRONICALLY STORED
9 INFORMATION.

10 3. "ELECTRONICALLY STORED INFORMATION" means data that is stored in an
11 electronic medium and shall include, by way of example only, computer programs, electronic mail
12 (including message contents, header information and logs of electronic mail usage), output
13 resulting from the use of any software program, including electronic, digital, or any other recorded
14 material whatsoever, including but not limited to, any notes, memoranda, videotapes, affidavits,
15 statements, papers, files, forms, data, tapes, printouts, letters, reports, communications, contracts,
16 agreements, telegrams, records, financial records, applications, correspondence, diaries, calendars,
17 recordings and transcriptions of recordings, voice mail messages recorded electronically and in
18 writing, email messages and printouts, photographs, diagrams, or any other writings, however
19 produced or reproduced, word processing documents, spreadsheets, databases, telephone logs,
20 contact manager information, Internet usage files, PDF files, .JPG files, .TIF files, .TXT files,
21 batch files, ASCII files, and any and all miscellaneous files and data and shall include all active-
22 data, deleted data, file fragments, metadata, native file formats and forensic images thereof.

23 4. "DOCUMENT" and/or "DOCUMENTS" unless otherwise indicated, are used in
24 their customarily broad sense and shall refer to and mean all writings and other tangible things of
25 any nature whatsoever, and shall include, but not be limited to, all writings (or drafts thereof),
26 medical records, drawings, graphs, charts, photographs, phone records, other data compilations or
27 storage devices from which information can be obtained (even if such information must be
28 translated into a reasonably usable form), magnetically recorded or stored information generated

1 by a computer, contracts, agreements, communications, correspondence, telegrams, memoranda,
2 records, reports, books, summaries or records of telephone conversations, summaries or records of
3 personal conversations or interviews, diaries, forecasts, statistical statements, work papers, drafts,
4 accounts, analytical records, minutes or records of meetings or conferences, records, reports or
5 summaries of negotiations, brochures, pamphlets, circulars, calendars, notes, marginal notations,
6 bills, invoices, checks, lists, journals, advertising, and all other written, printed, recorded or
7 photographic matter or sound reproductions, or tangible representations of things, however
8 produced or reproduced, including ELECTRONICALLY STORED INFORMATION and all
9 nonidentical copies of the foregoing.

10 5. "RELATING TO" means, without limitation, constituting, containing, showing,
11 reflecting, discussing, concerning, commenting upon, mentioning, evidencing, quoting,
12 describing, or referencing in any way, directly or indirectly.

13 6. "MR. DEPP" means and refers to John C. Depp, II.

14 7. "MS. HEARD" means and refers to Amber Laura Heard.

15 INSTRUCTIONS

16 8. When necessary, the singular form of a word shall be interpreted as plural, and the
17 masculine gender shall be deemed to include the feminine, in order to bring within the scope any
18 DOCUMENTS which might otherwise be construed to be outside the scope of these Requests.
19 The terms, "and" and "or," have both conjunctive and disjunctive meanings, and "each," "any,"
20 and "all" mean "each and every."

21 9. All undefined terms shall be interpreted according to their plain and commonsense
22 meaning.

23 10. DOCUMENTS should be produced as single page .tiff format files imaged at 300
24 dpi, with the exception of stand-alone Databases (e.g., Access), spreadsheets (e.g., Excel), slide
25 presentations (e.g., PowerPoint), video files, and audio files, which should be produced in native
26 format. Each .tiff file should have a unique name matching the Bates number labeled on the
27 corresponding page. Color DOCUMENTS should be produced in color.

28 11. DOCUMENTS should be produced with (a) a delimited data file (.dat), and (b) an

1 image load file (.opt and/or .lfp). Each .tiff in a production must be referenced in the
 2 corresponding image load file. The total number of documents referenced in a production's data
 3 load file should match the total number of designated document breaks in the image load file for
 4 the production.

5 12. DOCUMENTS should be produced with extracted metadata for each DOCUMENT
 6 in the form of a .dat file. The metadata should include the following fields, to the extent such
 7 fields are available in the original DOCUMENT as it originally existed in its native format:

Field	Description
Bates_Begin	The bates label of the first page of the document
Bates_End	The bates label of the last page of the document
Attach_Begin	The bates label of the first page of a family of documents (e.g., email and attachment)
Attach_End	The bates label of the last page of a family of documents
Sent_Date	For email, the sent date of the message
Sent_Time	For email, the sent time of the message converted to GMT
Email_Author	The sender of an email message (email FROM)
Recipient	The recipients of an email message (email TO)
CC	The recipients of a copy of an email message (email CC)
BCC	The recipients of a blind copy of an email message (email BCC)
Custodian	The custodian in whose file the document was found, including all duplicate custodians
Datercvd	Date received

1	Datesent	Date sent
2	Subject	E-mail subject
3	Author	The person who created the document
4	Modifier	The person who last modified the document
5	Created	The creation date of the document
6	Last_Modified	The last modified date of the document
7	Title	The title of the document
8	File_Name	The name of the file
9	File_Extension	The file extension of the document
10	MD5Hash	The MD5 Hash Value of the document
11	Message_ID	The Message ID of the email and/or attachment
12	Mailstore	The name of the Mailstore in which the email and/or attachment is contained
13	File_Size	The size of the file
14	File_Path	Original file path of the document as it existed in the normal course of business or the folder location if the document/email is contained in a Mailstore
15	Number_Pages	The number of pages in the document

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13. All DOCUMENTS attached to and/or embedded in an e-mail and/or other DOCUMENT must be produced contemporaneously and sequentially after the parent e-mail/document.

14. In producing DOCUMENTS, you shall furnish all DOCUMENTS in your possession, custody, or control. Without limitation of the term "control," a DOCUMENT is

1 deemed to be in your control if you have the right to secure the DOCUMENT or a copy thereof
2 from another person or public or private entity having actual possession thereof, or if you have the
3 practical ability to obtain the DOCUMENT from a third-party, irrespective of any legal
4 entitlement to the DOCUMENT. If any original DOCUMENT requested is not in your possession,
5 custody, or control, then you are required to produce the best available copy, and to state, to the
6 best of your knowledge, the name and address of the person in possession and/or control of the
7 original. The fact that a DOCUMENT is in possession of another person or entity does not relieve
8 you of the obligation to produce your copy of the DOCUMENT, even if the two DOCUMENTS
9 are identical. In addition, any copy of a DOCUMENT shall be produced if it differs in any respect
10 from the original (e.g., by reason of handwritten notes or comments having been added to copy
11 which do not appear on the original or otherwise).

12 15. If responsive DOCUMENTS no longer exist because they have been destroyed,
13 cannot be located, or are otherwise no longer in your possession or subject to your control,
14 identify each DOCUMENT and describe the circumstances under which it was lost or destroyed.

15 16. All DOCUMENTS should be organized and labeled to correspond by number with
16 the numbered categories set forth in these Requests. If a DOCUMENT is responsive to more than
17 one Request, reference that DOCUMENT in your written response to each Request to which it is
18 responsive or in a load file identifying the same.

19 17. A Request for a DOCUMENT shall be deemed to include a request for any and all
20 file folders within which the DOCUMENT was contained, transmittal sheets, cover letters,
21 exhibits, enclosures, or attachments to the DOCUMENT in addition to the DOCUMENT itself.

22 18. If you claim that any DOCUMENT is, in whole or in part, beyond the scope of
23 permissible discovery (including but not limited to any claim of privilege or confidentiality),
24 specify in detail each and every ground on which such claim rests and identify generally what the
25 document is. If you assert any claim of privilege, then at the time of production you are to furnish
26 a privilege log that specifically identifies each DOCUMENT (or portion) withheld by (a) date, (b)
27 author, (c) recipient, (d) persons copied, (e) general description of the subject matter of the
28 DOCUMENT, and (f) a statement of the specific privilege claimed and the basis upon which such

1 privilege is claimed as to each separate DOCUMENT (or portion) withheld. The privilege log
2 should contain enough specificity, but without disclosing privileged information, to allow
3 Plaintiffs and the Court to adequately assess the privilege claimed.

4 19. To the extent you consider any portion of the following Requests to be
5 objectionable, (a) identify the portion of the Request claimed to be objectionable, (b) state the
6 nature and basis of the objection, and (c) produce DOCUMENTS responsive to any portion of
7 such Request that is not claimed to be objectionable.

8 20. If you believe that any Request is unclear, unintelligible, or because of its wording
9 otherwise prevents you from responding fully to that Request, identify the ambiguity or source of
10 confusion and explain the definition and understanding that you relied upon in responding. It shall
11 be insufficient to object to a particular Request on the grounds that it is vague, ambiguous, or
12 otherwise unclear, and withhold DOCUMENTS on that basis without seeking clarification.

13 DOCUMENT REQUESTS

14 REQUEST NO. 1:

15 All DOCUMENTS and COMMUNICATIONS YOU reviewed and/or relied upon in
16 preparation for YOUR deposition.

17 REQUEST NO. 2:

18 All DOCUMENTS and all COMMUNICATIONS by and between YOU and any
19 PERSON, including but not limited to MS. HEARD, RELATING TO the purported incident in
20 Los Angeles, California in late 2012 or early 2013, involving MR. DEPP and MS. HEARD.

21 REQUEST NO. 3:

22 All DOCUMENTS and all COMMUNICATIONS by and between YOU and any
23 PERSON, including but not limited to MS. HEARD, RELATING TO the purported incident in
24 Los Angeles, California on March 8, 2013, involving MR. DEPP and MS. HEARD.

25 REQUEST NO. 4:

26 All DOCUMENTS and all COMMUNICATIONS by and between YOU and any
27 PERSON, including but not limited to MS. HEARD, RELATING TO the purported incident
28 occurring on a flight from Boston, Massachusetts to Los Angeles, California on or about May 24,

1 2014, involving MR. DEPP and MS. HEARD.

2 **REQUEST NO. 5:**

3 All DOCUMENTS and all COMMUNICATIONS by and between YOU and any
4 PERSON, including but not limited to MS. HEARD, RELATING TO the purported incident in the
5 Bahamas on August 17, 2014, involving MR. DEPP and MS. HEARD.

6 **REQUEST NO. 6:**

7 All DOCUMENTS and all COMMUNICATIONS by and between YOU and any
8 PERSON, including but not limited to MS. HEARD, RELATING TO the purported incident in
9 Los Angeles on December 17, 2014, involving MR. DEPP and MS. HEARD.

10 **REQUEST NO. 7:**

11 All DOCUMENTS and all COMMUNICATIONS by and between YOU and any
12 PERSON, including but not limited to MS. HEARD, RELATING TO the purported incident
13 taking place in a hotel room in Tokyo, Japan on January 25, 2015, involving MR. DEPP and MS.
14 HEARD.

15 **REQUEST NO. 8:**

16 All DOCUMENTS and all COMMUNICATIONS by and between YOU and any
17 PERSON, including but not limited to MS. HEARD, RELATING TO the purported incident in
18 Australia on March 3 through March 5, 2015, involving MR. DEPP and MS. HEARD.

19 **REQUEST NO. 9:**

20 All DOCUMENTS and all COMMUNICATIONS by and between YOU and any
21 PERSON, including but not limited to MS. HEARD, RELATING TO the purported incident in
22 Los Angeles, California in March 2015, involving MR. DEPP and MS. HEARD.

23 **REQUEST NO. 10:**

24 All DOCUMENTS and all COMMUNICATIONS by and between YOU and any
25 PERSON, including but not limited to MS. HEARD, RELATING TO the purported incident in
26 Thailand and/or Malaysia in August 2015, involving MR. DEPP and MS. HEARD.

27 **REQUEST NO. 11:**

28 All DOCUMENTS and all COMMUNICATIONS by and between YOU and any

1 PERSON, including but not limited to MS. HEARD, RELATING TO the purported incident in
2 Los Angeles, California on November 26, 2015, involving MR. DEPP and MS. HEARD.

3 **REQUEST NO. 12:**

4 All DOCUMENTS and all COMMUNICATIONS by and between YOU and any
5 PERSON, including but not limited to MS. HEARD, RELATING TO the purported incident in
6 Los Angeles, California on December 15, 2015, involving MR. DEPP and MS. HEARD.

7 **REQUEST NO. 13:**

8 All DOCUMENTS and all COMMUNICATIONS by and between YOU and any
9 PERSON, including but not limited to MS. HEARD, RELATING TO the purported incident in
10 Los Angeles, California on April 21, 2016, involving MR. DEPP and MS. HEARD.

11 **REQUEST NO. 14:**

12 All DOCUMENTS and all COMMUNICATIONS by and between YOU and any
13 PERSON, including but not limited to MS. HEARD, RELATING TO the purported incident in
14 Los Angeles, California on May 21, 2016, involving MR. DEPP and MS. HEARD.

15 **REQUEST NO. 15:**

16 All DOCUMENTS concerning YOUR in-person interactions with MR. DEPP on or
17 around May 21, 2016.

18 **REQUEST NO. 16:**

19 All DOCUMENTS and all COMMUNICATIONS by and between YOU and any
20 PERSON, including but not limited to MS. HEARD, RELATING TO the purported injuries that
21 appeared on MS. HEARD'S face on May 27, 2016, including any COMMUNICATIONS
22 RELATING TO how MS. HEARD came to have those purported injuries on her face on May 27,
23 2016.

24 **REQUEST NO. 17:**

25 All DOCUMENTS and all COMMUNICATIONS by and between YOU and any
26 PERSON, including but not limited to MS. HEARD, RELATING TO any other domestic abuse
27 incidents in which MS. HEARD assaulted MR. DEPP.

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1 **REQUEST NO. 18:**

2 All DOCUMENTS and all COMMUNICATIONS by and between YOU and any
3 PERSON, including but not limited to MS. HEARD, RELATING TO the incident between MS.
4 HEARD and Tasya van Ree that occurred at the Seattle-Tacoma International Airport on
5 September 14, 2009, which prompted MS. HEARD's arrest.

6 **REQUEST NO. 19:**

7 All DOCUMENTS and all COMMUNICATIONS by and between YOU and any
8 PERSON, including but not limited to MS. HEARD, RELATING TO any other domestic abuse
9 allegations against MR. DEPP not identified in Request Nos. 2 through 17.

10 **REQUEST NO. 20:**

11 All DOCUMENTS and all COMMUNICATIONS by and between YOU and any
12 PERSON, including but not limited to MS. HEARD, RELATING TO MS. HEARD'S relationship
13 with Elon Musk.

14 **REQUEST NO. 21:**

15 All DOCUMENTS and all COMMUNICATIONS by and between YOU and any
16 PERSON, including but not limited to MS. HEARD, RELATING TO MS. HEARD requesting
17 Ms. Trinity Esparza and Mr. Brandon Patterson of the Eastern Columbia Building to give a
18 statement to *People Magazine* about one week after MS. HEARD made her domestic abuse
19 allegations against MR. DEPP on May 27, 2016.

20 **REQUEST NO. 22:**

21 All DOCUMENTS concerning the affidavit that MS. HEARD submitted to obtain a
22 temporary restraining order against MR. DEPP, including but not limited to drafts of the same.

23 **REQUEST NO. 23:**

24 All COMMUNICATIONS by and between YOU and any PERSON, including but not
25 limited to MS. HEARD, concerning the affidavit that MS. HEARD submitted to obtain a
26 temporary restraining order against MR. DEPP.

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1 **REQUEST NO. 24:**

2 All DOCUMENTS and all COMMUNICATIONS by and between YOU and any
3 PERSON, including but not limited to MS. HEARD, RELATING TO YOUR in-person
4 interactions with MS. HEARD on or around the days after May 21, 2016.

5 **REQUEST NO. 25:**

6 All DOCUMENTS and all COMMUNICATIONS by and between YOU and any
7 PERSON, including but not limited to MS. HEARD, RELATING TO all draft versions and final
8 declarations or witness statements YOU have given in relation to any legal proceeding involving
9 MS. HEARD or MR. DEPP, including but not limited to, the current litigation for which YOU are
10 being deposed.

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SHORT TITLE: John C. Depp, II v. Amber Laura Heard	CASE NUMBER: CL-2019-0002911
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ATTACHMENT (Number): 5

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

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

Page 1 of 1

(Add pages as required)

SHORT TITLE: John C. Depp, II v. Amber Laura Heard	CASE NUMBER: CL-2019-0002911
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ATTACHMENT (Number): 6

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

See attached Fairfax County Circuit Court Subpoena

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

(Add pages as required)

brownrudnick

BENJAMIN G. CHEW
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March 20, 2020

VIA OVERNIGHT DELIVERY

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

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

Dear Mr. Frey,

Please find enclosed for filing in the above-referenced matter, original attorney-issued subpoena for deposition and documents to third party witness Laura Divenere. Also enclosed are three copies of the subpoena and a check for the Court's related fee. The subpoenas will be served in California by private process server. We request one file-stamped copy for immediate return by mail using the enclosed stamped return envelope. We also request one certified copy of the subpoena to be issued and served under the laws of the state of California. Upon preparation of the certified copy, please return by mail using the enclosed stamped return envelope.

This letter certifies that California has reciprocal privileges regarding discovery with Virginia and that I will cause copies of the subpoena to be served on counsel of record. Thank you for your assistance.

Regards,

BROWN RUDNICK LLP

 vsB#29113
Benjamin G. Chew

Enclosures

FILED
CIVIL INTAKE
2020 MAR 23 AM 10:57
JOHN T. FREY
CLERK CIRCUIT COURT
FAIRFAX, VA.

VIRGINIA:

IN THE CIRCUIT COURT OF FAIRFAX COUNTY, VIRGINIA

JOHN C. DEPP, II

Plaintiff,

v.

AMBER LAURA HEARD

Defendant.

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Civil Action No.: CL-2019-0002911

CERTIFICATE OF SERVICE

I hereby certify that I caused a true and correct copy of the enclosed Subpoena/Subpoena Duces Tecum to Person Under Foreign Subpoena and Deposition Subpoena for Personal Appearance and Production of Documents, Electronically Stored Information, and Things In Action Pending Outside California, to be sent via email (per written agreement between the Parties), on this 20th day of March 2020, to counsel of record.



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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:

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