

[ ] 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>Debbie Lloyd</u>	
ADDRESS: <u>71 Tempe Trail</u> <u>Palm Desert, CA 92211</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. 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

FILED  
CIVIL INTAKE  
2020 NOV 23 PM 3:28  
JOHN T. FREY  
CLERK, CIRCUIT COURT  
FAIRFAX, VA  
92011  
ZIP

Debbie Lloyd

NAME

71 Tempe Trail

STREET ADDRESS

Palm Desert

CA

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

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

at Remote Via Zoom Per Judicial Council of California Emergency Rule 11 ..... at January 27, 2021 at 9:00am 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.

December 1<sup>st</sup> 2020  
DATE ISSUED

JOHN T. FREY, CLERK

by [REDACTED]  
DEPUTY CLERK

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**

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 <a href="mailto:bchew@brownrudnick.com">bchew@brownrudnick.com</a> <a href="mailto:acrawford@brownrudnick.com">acrawford@brownrudnick.com</a> <i>Counsel for Plaintiff John C. Depp, II</i>	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 <a href="mailto:cvasquez@brownrudnick.com">cvasquez@brownrudnick.com</a> <i>Counsel for Plaintiff John C. Depp, II</i>
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 <a href="mailto:ebredehoft@cbcblaw.com">ebredehoft@cbcblaw.com</a> <a href="mailto:anadelhaft@cbcblaw.com">anadelhaft@cbcblaw.com</a> <a href="mailto:dmurphy@cbcblaw.com">dmurphy@cbcblaw.com</a> <i>Counsel for Defendant Amber Laura Heard</i>	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 <a href="mailto:brottenborn@woodsrogers.com">brottenborn@woodsrogers.com</a> <a href="mailto:jtreece@woodsrogers.com">jtreece@woodsrogers.com</a> <i>Counsel for Defendant Amber Laura Heard</i>

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

THE PEOPLE OF THE STATE OF CALIFORNIA, TO (name, address, and telephone number of deponent, if known):  
Debbie Lloyd, 71 Temple Trail, Palm Desert, CA 92211

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:

Date: January 27, 2021	Time: 9:00 a.m. (PST)	Address: VIA REMOTE ELECTRONIC MEANS
---------------------------	--------------------------	---

- 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:

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):

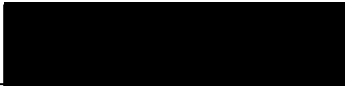
Continued on Attachment 4 (use form MC-025).

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: November 23, 2020

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:  
  
(SIGNATURE)

Date:  
  
(SIGNATURE)

**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 <a href="mailto:bchew@brownrudnick.com">bchew@brownrudnick.com</a> <a href="mailto:acrawford@brownrudnick.com">acrawford@brownrudnick.com</a> <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 <a href="mailto:cvasquez@brownrudnick.com">cvasquez@brownrudnick.com</a> <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 &amp; Brown, P.C. 11260 Roger Bacon Drive, Suite 201 Reston, Virginia 20190 Telephone: (703) 318-6800 <a href="mailto:ebredehoft@cbcblaw.com">ebredehoft@cbcblaw.com</a> <a href="mailto:anadelhaft@cbcblaw.com">anadelhaft@cbcblaw.com</a> <a href="mailto:dmurphy@cbcblaw.com">dmurphy@cbcblaw.com</a> <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 <a href="mailto:broddenborn@woodsrogers.com">broddenborn@woodsrogers.com</a> <a href="mailto:jtreece@woodsrogers.com">jtreece@woodsrogers.com</a> <i>Counsel for Defendant Amber Laura Heard</i></p>

**VIRGINIA:**

**IN THE CIRCUIT COURT OF FAIRFAX COUNTY**

JOHN C. DEPP, II,

Plaintiff,

v.

AMBER LAURA HEARD,


Defendant.

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 23<sup>rd</sup> day of November, 2020.

November 23, 2020

  
Elaine Charlson Bredehoff (VSB No. 23766)  
Adam S. Nadelhaft (VSB No. 91717)  
David E. Murphy (VSB No. 90938)  
Charlson Bredehoff Cohen & Brown, P.C.  
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[ebredehoff@cbcblaw.com](mailto:ebredehoff@cbcblaw.com)  
[anadelhaft@cbcblaw.com](mailto:anadelhaft@cbcblaw.com)  
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[brottenborn@woodsrogers.com](mailto:brottenborn@woodsrogers.com)  
[jtreece@woodsrogers.com](mailto: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 23<sup>rd</sup> Day of November, by email, by agreement of the parties, addressed as follows:

Benjamin G. Chew, Esq.  
Andrew C. Crawford, Esq.  
BROWN RUDNICK LLP  
601 Thirteenth Street, N.W.  
Washington, D.C. 20005  
Telephone: (202) 536-1700  
Facsimile: (202) 536-1701  
[bchew@brownrudnick.com](mailto:bchew@brownrudnick.com)  
[acrawford@brownrudnick.com](mailto:acrawford@brownrudnick.com)

Camille M. Vasquez, Esq.  
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Telephone: (949) 752-7100  
Facsimile: (949) 252-1514  
[cvasquez@brownrudnick.com](mailto:cvasquez@brownrudnick.com)

*Counsel for Plaintiff John C. Depp, II*

  
Elaine Charlson Bredehoff (VSB No. 23766)

CHARLSON BREDEHOFT COHEN & BROWN, P.C.

ATTORNEYS AND COUNSELORS AT LAW

CURTIS L. CHARLSON (1925-2010)  
ELAINE CHARLSON BREDEHOFT<sup>o</sup>  
PETER C. COHEN<sup>o</sup>  
CARLA D. BROWN<sup>o</sup>  
ADAM S. NADELHAFT<sup>o</sup>

KATHLEEN Z. QUILL<sup>o</sup>  
DAPHNE S. GEBAUER<sup>o</sup>  
YVONNE A. MILLER<sup>o</sup>  
DAVID E. MURPHY<sup>o</sup>

<sup>o</sup>ALSO ADMITTED IN D.C.  
<sup>o</sup>ALSO ADMITTED IN MARYLAND  
<sup>o</sup>ALSO ADMITTED IN MASSACHUSETTS  
<sup>o</sup>ALSO ADMITTED IN NEW YORK  
<sup>o</sup>ALSO ADMITTED IN WISCONSIN  
<sup>o</sup>ONLY ADMITTED IN MARYLAND

November 23, 2020

FILED  
CIVIL INTAKE  
2020 NOV 23 PM 3:20  
JOHN T. FREY  
CLERK, CIRCUIT COURT  
FAIRFAX, VA

**BY U.S. MAIL**

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 the original plus three 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 for Production of Business Records in Action Pending Outside California, Subpoenas Duces Tecum to Person Under Foreign Subpoena, and Deposition Subpoena for Personal Appearance in Action Pending Outside California have been issued in accordance with both Acts and the reciprocal privileges included therein.

Please also find a check in the amount of \$42, made payable to the Clerk, Fairfax Circuit Court, for the filing fee.

Thank you very much for your assistance.

Very truly yours,

  
Elaine Charlson Bredehoft

Enclosures

Cc: Counsel of Record