

BEN ROTTENBORN
(540) 983-7540
brottenborn@woodsrogers.com

December 23, 2020

FILED

DEC 30 2020

JOHN T. FREY
Clerk of the Circuit Court
of Fairfax County, VA

Hon. Bruce D. White
Fairfax County Circuit Court
4110 Chain Bridge Road
Fairfax, VA 22030

Re: *John C. Depp, II v. Amber Laura Heard; Case No.: CL-2019-2911; Fairfax County Circuit Court*

Dear Judge White:

On behalf of Defendant Amber Heard, please see the attached proposed order from the December 18 hearing on Mr. Depp's motion to compel. We have attached a redline showing the way our proposed order differs from Mr. Depp's, as well as a clean version of our proposed order.

While the parties were able to agree on most of the language of their proposed orders, they differ on the paragraph regarding Mr. Depp's Third Document Requests 44, 45, and 47. Ms. Heard's order tracks exactly what the Court ordered: that responses to those requests were compelled. Mr. Depp's proposed order, on the other hand, attempts to add additional requirements that are not necessarily part of Requests 44, 45, and 47. We believe this is inappropriate, especially in light of the Court's repeated admonitions that it is not going to entertain matters not properly before the Court.

For convenience in reviewing these Orders, Plaintiff's Requests 44, 45, and 47 are as follows:

44. All Documents that evidence or reflect any donations made by You of any settlement payments made to You by Mr. Depp in connection with the Divorce Action.
45. Documents sufficient to identify any and all entities to which You made any donations from any settlement payments made to You by Mr. Depp in connection with the Divorce Action, and the amount(s) of any such donation(s).
47. All Documents that contain, constitute, refer, reflect, or relate to any and all Communications between You and any other Person regarding any donations made by You from any settlement payments made to You by Mr. Depp.

If you have any questions about any of the above, please do not hesitate to let us know.

P.O. Box 14125, Roanoke, Virginia 24038-4125
10 S. Jefferson Street, Suite 1400, Roanoke VA 24011
P (540) 983-7600 • F (540) 983-7711

www.woodsrogers.com

Charlottesville • Lynchburg • Richmond • Roanoke

Hon. Bruce D. White
December 23, 2020
Page 2

Respectfully,

WOODS ROGERS PLC



Ben Rottenborn

JBR

cc: Other Counsel of Record