

VIRGINIA:

IN THE CIRCUIT COURT OF FAIRFAX COUNTY

John C. Depp, II,

Plaintiff,

v.

Amber Laura Heard,

Defendant.

Civil Action No.: CL-2019-0002911

FILED
JAN 04 2022
JOHN T. FREY
Clerk of the Circuit Court
of Fairfax County, VA

**DEFENDANT AND COUNTERCLAIM PLAINTIFF AMBER LAURA HEARD'S
OPPOSITION TO PLAINTIFF AND COUNTERCLAIM DEFENDANT'S MOTION TO
COMPEL RESPONSES TO FOURTH INTERROGATORIES AND TENTH AND
ELEVENTH REQUESTS FOR PRODUCTION**

****FILED UNDER SEAL****

Elaine Charlson Bredehoft (VSB #23766)
Adam S. Nadelhaft (VSB #91717)
Clarissa K. Pintado (VSB 86882)
David E. Murphy (VSB #90938)
Charlson Bredehoft Cohen Brown & Nadelhaft, P.C.
11260 Roger Bacon Drive, Suite 201
Reston, VA 20190
(703) 318-6800
ebredehoft@cbcbllaw.com
anadelhaft@cbcbllaw.com
cpintado@cbcbllaw.com
dmurphy@cbcbllaw.com

J. Benjamin Rottenborn (VSB #84796)
Joshua R. Treece (VSB #79149)
WOODS ROGERS PLC
10 S. Jefferson Street, Suite 1400
P.O. Box 14125
Roanoke, Virginia 24011
(540) 983-7540
brotenborn@woodsrogers.com

Mr. Depp filed the Motion to Compel the RFPs prior to any meet and confer or conciliation. With the help of the Conciliator, the parties were able to resolve the Motion with respect to the Interrogatories, and combining two meet and confers and a Conciliation of Mr. Depp's 10th and 11th RFPs with the overlapping portions of Ms. Heard's 15th, 16th and 17th RFPs because of the similarity of the requests, the parties were able to resolve many of these by mutual agreements. The Consent Order addresses these five sets of RFPs to avoid further motions on the same topic areas. As of the filing of this brief, the Consent Order still being circulated, so this brief addresses the issues we believe remain with respect to Mr. Depp's RFPs.

I. MR. DEPP'S 10TH REQUESTS FOR PRODUCTION

Expert Discovery: Virginia law limits expert discovery strictly to Interrogatories and depositions, and does not include RFPs. Va. Sup. Ct. R. 4:1(b)(4)(A)(i-ii). Only upon motion and **for good cause** shown does the Court "order further discovery by other means," and even then requires reimbursement of "fees and expenses as the court may deem appropriate." *Id.* at 4:1(b)(4)(A)(iii). Mr. Depp has not articulated, much less demonstrated sufficient good cause to warrant additional expert discovery. For example, Mr. Depp seeks *all documents and communications reflecting* the "raw data" associated with the forensic psychological evaluation of Ms. Heard (RFP 18), along with "all documents that memorialize the tests and test results" (RFP 4). **Att. 1.** The raw data are the test questions, which were produced by Ms. Heard's expert to Mr. Depp's expert (who then conducted a 15-hour Rule 4:10 exam on Ms. Heard) based on the Court's October 8 ruling. **Att. 3.** Mr. Depp's request seeks "all documents and communications reflecting or evidencing the raw data" with no explanation of what this even means, or why counsel needs this information (after earlier asking that it be solely for experts).

Second, Mr. Depp seeks documents related to the "collateral interviews" with Ms. Heard's therapists, including Dr. Bonnie Jacobs and Dr. Connell Cowan, related to the "forensic

psychological evaluation of Ms. Heard” (RFP 5) and the interview with Ms. Heard’s mother (RFP 6). **Att. 1.** Depp also seeks all documents and communications (RFP 1) and notes and other records (RFP 2) related to the forensic psychological evaluation. *Id.* But the Court already *rejected* Mr. Depp’s attempt for Dr. Curry to receive Dr. Hughes’ “intake form” and her “collateral interviews with individuals,” and the “review of relevant records.” **Att. 3**, at ¶ 6(a-b).

Third, Depp seeks all documents reflecting any “press requests” (RFP 20), “endorsement deals” (RFP 21), “lost career opportunities” (RFP 22), and documents related to Ms. Heard receiving “critical and box office acclaim” from Ms. Heard’s expert disclosures (RFP 25). **Att. 1.** Ms. Heard agreed to produce documents to the extent “relied on by any of Ms. Heard’s expert witnesses in providing any opinions in this case” (**Att. 7**), consistent with the Court’s prior Order regarding the scope of expert discovery (**Att. 4**). Mr. Depp seeking documents not relied on by Ms. Heard’s experts is far beyond the scope of permissible discovery.

Finally, Mr. Depp seeks documents Dr. Hughes relied on in conducting the evaluation of Ms. Heard (RFP 3). **Att. 1.** Again, what does this even mean? Textbooks? Manuals? Ms. Heard has agreed to produce documents relied on “in providing any opinions” with the exception of the documents the Court previously excluded from discovery in its October 8 Order. **Att. 7.**

Medical Records and Treatment History Discovery: Mr. Depp seeks an incredibly overbroad array of medical documents with no time limitation. For example, Mr. Depp seeks “all documents and communications” related to “treatment for mental health issues” (RFP 17), along with “all documents and communications” prior to, during, and after her relationship with Mr. Depp related to any diagnosis with any mental, emotional, or psychological disorders (RFPs 7-8). **Att. 1.** Mr. Depp further seeks “all documents and communications” related to physical, mental, or other abuse and injuries suffered from any other person at any time (RFPs 12-13),

including abuse suffered during childhood. *Id.* Mr. Depp further seeks “all documents and communications” relating to any psychological or psychiatric evaluation of Ms. Heard at any time prior to meeting Mr. Depp, during the relationship, and after filing for divorce (RFPs 9-11), along with “all documents and communications” related to any diagnoses or treatment for any physical, mental, or emotional disorder or harm (RFPs 14-15), or treatment by any therapist at any time (RFP 16). *Id.* But the Court already defined the scope of relevant discovery of Ms. Heard’s medical records as “Ms. Heard’s medical and psychological treatment stemming from any alleged abuse by Mr. Depp.” **Att. 5.** The Court rejected Mr. Depp seeking health information “related to...Ms. Heard’s treatment stemming from abuse of alcohol or drugs” and “Ms. Heard’s mental health records.” *Id.* So the Court has already overruled these requests. Mr. Depp’s requests for medical documents spanning Ms. Heard’s *entire life* (“abuse at a very young age”) are even more egregiously overbroad, irrelevant, and harassing- yet another basis to deny them outright. **Att. 1**, RFPs 12-15. For these reasons, RFPs 7-17 should be denied.

All Reviews of Ms. Heard’s Performances and their Financial Success: RFPs 26-27 seek all documents over an 11-year period referring to any reviews of Ms. Heard’s performances (RFP 26) and that “discuss the financial success or failure of any film or television program” in which she performed (RFP 27). **Att. 1.** The overbreadth of these Requests is apparent from its plain language, as it would require searching, reviewing, and producing every document even commenting on any of Ms. Heard’s performances or their financial success or failure.

Documents Relating to Entire Litigations or Pleadings: RFP 28 is overbroad by seeking all documents and communications relating to any of the Counterclaim’s eight alleged defamatory statements (of which only three remain in the case). **Att. 1.** Mr. Depp then seeks all communications between Ms. Heard and any source of income relating to these same eight

statements (RFP 29), Mr. Depp's entire Complaint and all allegations in this Action (RFP 30), and all of Mr. Depp's allegations in the U.K. Action (RFP 31). *Id.* These Requests are precisely the type this Court has previously denied as overbroad and should again.

Documents Reflecting Compensation from Endorsements: As revised by Mr. Depp, RFPs 23-24 seeks documents sufficient to show compensation from endorsement deals with no date limitation. *Id.* Ms. Heard produced her L'Oreal contract, and agreed to produce any additional documents sufficient to reflect compensation from endorsement deals from 2017 to the present.

II. MR. DEPP'S 11TH REQUESTS FOR PRODUCTION

Documents and Photographs Related to Abuse: Based on the parties being similarly situated respecting the dates of abuse and document requests, Ms. Heard agreed to produce documents referring to the abuse incidents described in her Witness Statement if Mr. Depp agreed to produce the same. **Att. 2**, RFPs 1, 2, 5, 7, 10, 13, 14, 18, 22, 24, 26, 32, and 35. Ms. Heard further agreed to produce documents referring to Mr. Depp on and within ten days after the dates of the abuse incidents, so long as Mr. Depp agreed to produce documents referring to Ms. Heard on the same dates. *Id.*, RFPs 3, 6, 11, 15, 16, 20, 21, 23, 25, 27, 28, 31, and 36. Mr. Depp refused, despite the parties being similarly situated respecting the relevance of these documents and agreeing to the mutuality resolves both sides' issues and prevents further motions on the same topics. RFP 17 is overbroad in seeking all photographs taken in Australia, regardless of subject matter. **Att. 2**. Ms. Heard proposed production of photographs of herself, Mr. Depp, or the Australia house if Mr. Depp agreed to the same. **Att. 7**. Mr. Depp refused, despite the parties being similarly situated respecting relevance and document requests. The Court should enter Ms. Heard's proposed Order on these requests, given that Ms. Heard, acting in good faith, accelerated the meet and confers and Conciliation process combining the parties' similar requests to avoid yet another hearing on the same topic areas. Mr. Depp simply wants to delay his

production and force another hearing, which is contrary to reasonable judicial economy.

Mr. Depp's Remaining Overbroad RFPs: RFP 4 is overbroad, vague, and ambiguous by seeking all communications with eight individuals "concerning the state of Your relationship with Mr. Depp" for over seven years. **Att. 2.** The phrase "relationship with Mr. Depp" is undefined and was previously denied by this Court as overbroad, because it would require review and production of essentially every document during the entirety of the parties' relationship. **Att. 6.** RFP 12 is overbroad in seeking all communications with certain individuals relating to Ms. Heard's engagement and wedding to Mr. Depp. **Att. 2.** During the meet and confer, Ms. Heard agreed to produce communications with these individuals respecting advice or concerns about marrying Mr. Depp or the use or abuse of illegal drugs or alcohol at the wedding. **Att. 7.** Mr. Depp insisting on the production of all "reactions to the news of the wedding" or "expressions of congratulations" remain overbroad, unduly burdensome, and unlikely to lead to admissible evidence. RFP 29 is overbroad by seeking all documents related to Ms. Heard's appearance on the "Late Late Show" with James Corden on December 16, 2015. **Att. 2.** Ms. Heard proposed revising this RFP to documents mentioning her physical appearance or mental condition, along with communications with or reactions from individuals respecting her physical appearance or mental condition. **Att. 7.** RFPs 33-34 seeking all communications with all "friends and family" over five weeks are overbroad as phrased by having no subject limitation. **Att. 2.** Ms. Heard proposed revising these RFPs to seek communications referring to "friends and family" being "increasingly worried" for her safety and advising her that she "should leave." **Att. 7.**

CONCLUSION

Ms. Heard respectfully requests the Court enter her proposed Order, which reflects a reasonable tailoring and mutuality of discovery production on these related topics. **Att. 8.**

January 4, 2022

Respectfully submitted,



Elaine Charlson Bredehoft (VSB #23766)
Adam S. Nadelhaft (VSB #91717)
Clarissa K. Pintado (VSB 86882)
David E. Murphy (VSB #90938)
Charlson Bredehoft Cohen Brown & Nadelhaft, P.C.
11260 Roger Bacon Drive, Suite 201
Reston, VA 20190
(703) 318-6800
ebredehoft@cbcbllaw.com
anadelhaft@cbcbllaw.com
cpintado@cbcbllaw.com
dmurphy@cbcbllaw.com

J. Benjamin Rottenborn (VSB #84796)
Joshua R. Treece (VSB #79149)
WOODS ROGERS PLC
10 S. Jefferson Street, Suite 1400
P.O. Box 14125
Roanoke, Virginia 24011
(540) 983-7540
brottenborn@woodsrogers.com
jtreece@woodsrogers.com

*Counsel to Defendant and Counterclaim-Plaintiff,
Amber Laura Heard*

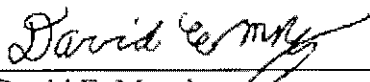
CERTIFICATE OF SERVICE

I certify that on this 4th day January, 2022, a copy of the foregoing was served 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
acrawford@brownrudnick.com

Camille M. Vasquez, Esq.
BROWN RUDNICK LLP
2211 Michelson Drive
Irvine, CA 92612
Telephone: (949) 752-7100
Facsimile: (949) 252-1514
cvasquez@brownrudnick.com

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



David E. Murphy

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

Pursuant to Rule 4:9 of the Rules of the Supreme Court of Virginia ("Rules"), Defendant and Counterclaim Plaintiff Amber Laura Heard, by and through her attorneys, submits these objections and responses (the "Responses") to Plaintiff and Counterclaim Defendant John C. Depp, II's Tenth Set of Requests for Production dated November 3, 2021 (the "Requests").

GENERAL OBJECTIONS

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

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

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

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

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

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

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

7. Defendant and Counterclaim Plaintiff objects to the Requests to the extent they require unreasonable or unduly burdensome measures to locate and produce responsive documents. Defendant and Counterclaim Plaintiff will construe the Requests to require a reasonable and diligent search of reasonably-accessible files within her possession, custody, or control where she would reasonably expect to find information, documents, or things related to the Requests.

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

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

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

11. Defendant and Counterclaim Plaintiff expressly reserves all rights and privileges under the Rules and any other applicable law or rule. The failure to assert such rights and

privileges or the inadvertent disclosure by Defendant and Counterclaim Plaintiff of information or documents protected by such rights or privileges shall not constitute a waiver thereof, either with respect to these Responses or with respect to any future discovery objections or responses. Defendant and Counterclaim Plaintiff's Responses to the Requests are made to the best of her present knowledge, information, and belief. These Responses are at all times subject to such additional or different documents and information that discovery or further investigation may disclose and, while based on the present state of Defendant and Counterclaim Plaintiff's knowledge and investigation, are subject to such additional knowledge of facts as may result from Defendant and Counterclaim Plaintiff's further discovery or investigation.

OBJECTIONS TO DEFINITIONS

1. Defendant and Counterclaim Plaintiff objects to Definition No. 2 on the grounds that it is overly broad, unduly burdensome, and seeks documents not reasonably calculated to lead to the discovery of admissible evidence regarding the claims and defenses in this case, taking into account the needs of the case, the amount in controversy, limitations on the parties' resources, and the importance of the discovery in resolving the issues at stake in the litigation to the extent it seeks documents beyond the scope of Va. Sup. Ct. R. 4:9(a). Since a "Chat Application" is a form of a "Document," Defendant and Counterclaim Plaintiff will interpret the phrase "Chat Application" in accordance with the definition included in Va. Sup. Ct. R. 4:9(a).

2. Defendant and Counterclaim Plaintiff objects to Definition No. 3 on the grounds that it is overly broad, unduly burdensome, and seeks documents not reasonably calculated to lead to the discovery of admissible evidence regarding the claims and defenses in this case, taking into account the needs of the case, the amount in controversy, limitations on the parties'

resources, and the importance of the discovery in resolving the issues at stake in the litigation to the extent it seeks documents beyond the scope of Va. Sup. Ct. R. 4:9(a). Since a “Communication” is a form of a “Document,” Defendant and Counterclaim Plaintiff will interpret the word “Communication” in accordance with the definition included in Va. Sup. Ct. R. 4:9(a). Defendant and Counterclaim Plaintiff further objects to this Definition to the extent it seeks documents and information protected by the attorney-client privilege, and on the grounds that this Definition invades protected litigation work product and would require disclosure of core opinion work product and mental impression of counsel, which is prohibited by 4:1(b)(3) of the Rules of the Virginia Supreme Court. Plaintiff and Counterclaim Defendant has not made the requisite showing under the Rules.

3. Defendant and Counterclaim Plaintiff objects to Definition No. 4 on the grounds that it is overly broad, unduly burdensome, and seeks documents not reasonably calculated to lead to the discovery of admissible evidence regarding the claims and defenses in this case, taking into account the needs of the case, the amount in controversy, limitations on the parties’ resources, and the importance of the discovery in resolving the issues at stake in the litigation. On September 18, 2020, the Fairfax County Circuit Court ruled that Request Nos. 1-6 and 8 of Ms. Heard’s 6th Requests for Documents and Request Nos. 1, 3, 5, and 7 of Ms. Heard’s 7th Requests seeking documents during the parties’ marriage and related to the divorce litigation was overbroad and beyond the scope of relevant discovery in this case because “its denied under the doctrine of enough is enough. You all have been through the divorce already. We’re not going to retry that divorce in this case.”

4. Defendant and Counterclaim Plaintiff objects to Definition No. 5 on the grounds that it is overly broad, unduly burdensome, and seeks documents not reasonably calculated to

lead to the discovery of admissible evidence regarding the claims and defenses in this case, taking into account the needs of the case, the amount in controversy, limitations on the parties' resources, and the importance of the discovery in resolving the issues at stake in the litigation to the extent it seeks documents beyond the scope of Va. Sup. Ct. R. 4:9(a). Defendant and Counterclaim Plaintiff will interpret the word "Document" in accordance with the definition included in Va. Sup. Ct. R. 4:9(a). Defendant and Counterclaim Plaintiff further objects to this Definition to the extent it seeks documents and information protected by the attorney-client privilege, and on the grounds that this Definition invades protected litigation work product and would require disclosure of core opinion work product and mental impression of counsel, which is prohibited by 4:1(b)(3) of the Rules of the Virginia Supreme Court. Plaintiff and Counterclaim Defendant has not made the requisite showing under the Rules.

5. Defendant and Counterclaim Plaintiff objects to Definition No. 7 on the grounds that it is overly broad, unduly burdensome, and seeks documents not reasonably calculated to lead to the discovery of admissible evidence regarding the claims and defenses in this case, taking into account the needs of the case, the amount in controversy, limitations on the parties' resources, and the importance of the discovery in resolving the issues at stake in the litigation, and because it seeks documents outside of Defendant and Counterclaim Plaintiff's possession, custody, or control. Defendant and Counterclaim Plaintiff further objects to this Definition to the extent it seeks documents and information protected by the attorney-client privilege, and on the grounds that this Definition invades protected litigation work product and would require disclosure of core opinion work product and mental impression of counsel, which is prohibited by 4:1(b)(3) of the Rules of the Virginia Supreme Court. Plaintiff and Counterclaim Defendant has not made the requisite showing under the Rules.

6. Defendant and Counterclaim Plaintiff objects to Definition No. 10 on the grounds that it is overly broad, unduly burdensome, and seeks documents not reasonably calculated to lead to the discovery of admissible evidence regarding the claims and defenses in this case, taking into account the needs of the case, the amount in controversy, limitations on the parties' resources, and the importance of the discovery in resolving the issues at stake in the litigation, including because on November 20, 2020, the Fairfax County Circuit Court ruled that discovery seeking documents "sufficient to reflect the impact" of the UK litigation "on Mr. Depp's reputation and career" was overly broad, unduly burdensome, and unreasonably vague, and therefore held that those Requests and this Request are beyond the scope of discovery in this case. And on December 18, 2020 the Fairfax County Circuit Court ruled that Request No. 23 of Mr. Depp's 2nd Requests for Document and Request 50 of Mr. Depp's 3rd Requests for Documents seeking all documents and communications between Ms. Heard and The Sun/NGN was overbroad, and therefore held that Request and this Request are beyond the scope of discovery in this case. The Court also ruled that Request No. 51 of Mr. Depp's 3rd Requests for Documents seeking all documents and communications relating to the UK Action was also overbroad. Additionally, Mr. Depp repeatedly took the position in his Opposition to Ms. Heard's Supplemental Plea in Bar that this Action and the U.K. Action did not arise from the same transaction or occurrence.

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

8. Defendant and Counterclaim Plaintiff objects to Definition No. 12 as vague,

ambiguous, and failing to define with particularity the documents and information that it seeks, and is therefore overly broad and unduly burdensome, as it attempts to define non-specific words, terms, and phrases without providing any such definition.

OBJECTIONS TO INSTRUCTIONS

1. Defendant and Counterclaim Plaintiff objects to Instruction No. 1 to the extent it exceeds the requirements of Va. Sup. Ct. R. 4:9(a), which only requires the production of documents “which are in the possession, custody, or control of the party upon whom the request is served,” and is therefore overly broad, unduly burdensome, and seeks documents not reasonably calculated to lead to the discovery of admissible evidence regarding the claims and defenses in this case. Defendant and Counterclaim Plaintiff will produce documents in accordance with Va. Sup. Ct. R. 4:9(a). Defendant and Counterclaim Plaintiff further objects to this Instruction to the extent it seeks documents and information protected by the attorney-client privilege, and on the grounds that this Instruction invades protected litigation work product and would require disclosure of core opinion work product and mental impression of counsel, which is prohibited by 4:1(b)(3) of the Rules of the Virginia Supreme Court. Plaintiff and Counterclaim Defendant has not made the requisite showing under the Rules.

2. Defendant and Counterclaim Plaintiff objects to the portion of Instruction No. 3 seeking “The date such additional documents came into your possession shall be specified, as well as the identity of the individuals who furnished such additional documents to the person preparing the response” because it exceeds the requirements of Va. Sup. Ct. R 4:9 by requesting substantive information in a response to a Request for Production of Documents, and is therefore overly broad, unduly burdensome, and seeks documents not reasonably calculated to lead to the discovery of admissible evidence regarding the claims and defenses in this case.

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

4. Defendant and Counterclaim Plaintiff objects to Instruction Nos. 5(b) and (c) because the requests to identify each document in the manner requested and to “provide a description of the subject matter of each document or item” exceed the requirements of Va. Sup. Ct. Rs 4:9 and 4:1(b)(6) by requesting substantive information in a response to a Request for Production of Documents, and are therefore overly broad, unduly burdensome, and seek documents and information not reasonably calculated to lead to the discovery of admissible evidence regarding the claims and defenses in this case.

5. Defendant and Counterclaim Plaintiff objects to Instruction No. 6 as unduly burdensome because the Defendant and Counterclaim Plaintiff has an ongoing duty under Va. Sup. Ct. R. 4:1(e) to supplement document production and responses when and where necessary, and this instruction is therefore overly broad and unduly burdensome. Defendant and Counterclaim Plaintiff further objects to this Instruction because by its plain language of “no documents in existence” it seeks for Defendant and Counterclaim Plaintiff to respond regarding documents anywhere “in existence” that are outside of Defendant and Counterclaim Plaintiff’s possession, custody, or control.

6. Defendant and Counterclaim Plaintiff objects to Instruction No. 7 to the extent it

seeks documents and information protected by the attorney-client privilege, and on the grounds that this Request invades protected litigation work product and would require disclosure of core opinion work product and mental impression of counsel, which is prohibited by 4:1(b)(3) of the Rules of the Virginia Supreme Court.

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

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

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

Court.

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

11. Defendant and Counterclaim Plaintiff objects to Instruction No. 12 on the grounds that it exceeds the requirements of Va. Sup. Ct. R 4:9, and is therefore overly broad, unduly burdensome, and seeks documents and information not reasonably calculated to lead to the discovery of admissible evidence regarding the claims and defenses in this case. Defendant and Counterclaim Plaintiff will produce documents as they are kept in the usual course of business pursuant to Va. Sup. Ct. R. 4:9(b)(iii)(A). The Instruction is also ambiguous because it contradicts Instruction No. 9. Defendant and Counterclaim Plaintiff further objects to this instruction because a request to access, extract, inspect, and/or test Defendant and Counterclaim Plaintiff's devices raises significant issues of confidentiality and privacy, is subject to the balancing required by Va. Sup. Ct. R. 4:1(b)(1), and requires a heightened showing of relevance and discoverability that Plaintiff and Counterclaim Defendant has not demonstrated in this case. Such a request does not create a routine right of direct access to a party's electronic information and devices, as Courts guard against undue intrusiveness, undue burden, and significant overbreadth that results from the requested type of access, extraction, inspection, and/or testing. Additionally, Plaintiff and Counterclaim Defendant's UK Counsel confirmed on July 17, 2020 that Plaintiff and Counterclaim Defendant did not dispute the accuracy of the accompanying

date/time metadata to the May 2016 images, and further that any analysis of digital images will not yield any additional information than what can be seen from the images. For all of these reasons, Defendant and Counterclaim Plaintiff objects to this Instruction as overly broad, unduly burdensome, harassing, and seeking information not reasonably calculated to lead to the discovery of admissible evidence regarding the claims and defenses in this case, taking into account the needs of the case, the amount in controversy, limitations on the parties' resources, and the importance of the discovery in resolving the issues at stake in the litigation.

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

13. Defendant and Counterclaim Plaintiff objects to Instruction No. 15 because it seeks documents protected by the attorney-client privilege, and on the grounds that this Request invades protected litigation work product and would require disclosure of core opinion work product and mental impression of counsel, which is prohibited by 4:1(b)(3) of the Rules of the Virginia Supreme Court. Defendant and Counterclaim Plaintiff further objects to this Instruction seeking all documents in the possession of "any consultants or experts" because it exceeds the requirements of Va. Sup. Ct. R. 4:1(b)(4), and is therefore overly broad, unduly burdensome, and seeks documents not reasonably calculated to lead to the discovery of admissible evidence regarding the claims and defenses in this case.

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

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

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

REQUESTS FOR PRODUCTION

1. All Documents and Communications that refer, reflect, or relate to the “forensic psychological evaluation of Ms. Heard” conducted by Dr. Dawn Hughes and referenced in Your Disclosure of Expert Witnesses.

OBJECTION: Defendant and Counterclaim Plaintiff objects to the phrase “relate to” of this Request on the grounds that it is vague, ambiguous, and fails to define with particularity the information that it seeks, is overly broad, unduly burdensome, and seeks information not reasonably calculated to lead to the discovery of admissible evidence regarding the claims and defenses in this case, taking into account the needs of the case, the amount in controversy, limitations on the parties’ resources, and the importance of the discovery in resolving the issues at stake in this litigation. Defendant and Counterclaim Plaintiff further objects to this Request because it seeks raw data from Dr. Hughes, which this Court held in its October 7, 2021 Order could be produced only to Dr. Curry, and that Plaintiff and Counterclaim Defendant’s counsel could not have access to. Defendant and Counterclaim Plaintiff further objects to this Request it seeks documents that have already been produced. Defendant and Counterclaim Plaintiff further objects to this Request because it seeks discovery of expert information through a document request, which is not permitted absent a Court Order, after finding good reason and then

authorizing only very limited discovery under Va. Sup. Ct. R. 4:1(b)(4)(A)(iii).

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

RESPONSE: Subject to and without waiving the objections and pursuant to Va. Sup. Ct. R. 4:1(b)(4), Defendant and Counterclaim Plaintiff stands on her objections to this Request. Pursuant to Va. Sup. Ct. R. 4:1(b)(4)(A)(iii) requiring a Court Order, Defendant and Counterclaim Plaintiff is willing to meet and confer with Plaintiff and Counterclaim Defendant on a mutual procedure by which both Defendant and Counterclaim Plaintiff and Plaintiff and Counterclaim Defendant mutually agree on a very limited production of documents, through a mutual Consent Order.

2. All notes and other records of the “forensic psychological evaluation of Ms. Heard” conducted by Dr. Dawn Hughes and referenced in Your Disclosure of Expert Witnesses.

OBJECTION: Defendant and Counterclaim Plaintiff objects to the phrase “other records” of this Request on the grounds that it is vague, ambiguous, and fails to define with particularity the information that it seeks, is overly broad, unduly burdensome, and seeks information not reasonably calculated to lead to the discovery of admissible evidence regarding the claims and defenses in this case, taking into account the needs of the case, the amount in controversy, limitations on the parties’ resources, and the importance of the discovery in resolving the issues at stake in this litigation. Defendant and Counterclaim Plaintiff further objects to this Request because it seeks raw data from Dr. Hughes, which this Court held in its

October 7, 2021 Order could be produced only to Dr. Curry, and that Plaintiff and Counterclaim Defendant's counsel could not have access to. Defendant and Counterclaim Plaintiff further objects to this Request because it seeks discovery of expert information through a document request, which is not permitted absent a Court Order, after finding good reason and then authorizing only very limited discovery under Va. Sup. Ct. R. 4:1(b)(4)(A)(iii).

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

RESPONSE: Subject to and without waiving the objections and pursuant to Va. Sup. Ct. R. 4:1(b)(4), Defendant and Counterclaim Plaintiff stands on her objections to this Request. Pursuant to Va. Sup. Ct. R. 4:1(b)(4)(A)(iii) requiring a Court Order, Defendant and Counterclaim Plaintiff is willing to meet and confer with Plaintiff and Counterclaim Defendant on a mutual procedure by which both Defendant and Counterclaim Plaintiff and Plaintiff and Counterclaim Defendant mutually agree on a very limited production of documents, through a mutual Consent Order.

3. All Documents relied on by Dr. Dawn Hughes in conducting the "forensic psychological evaluation of Ms. Heard" referenced in Your Disclosure of Expert Witnesses.

OBJECTION: Defendant and Counterclaim Plaintiff objects to this Request because it seeks raw data from Dr. Hughes, which this Court held in its October 7, 2021 Order could be produced only to Dr. Curry, and that Plaintiff and Counterclaim Defendant's counsel could not have access to. Defendant and Counterclaim Plaintiff further objects to this Request it seeks

documents that have already been produced. Defendant and Counterclaim Plaintiff further objects to this Request because it seeks discovery of expert information through a document request, which is not permitted absent a Court Order, after finding good reason and then authorizing only very limited discovery under Va. Sup. Ct. R. 4:1(b)(4)(iii). Defendant and Counterclaim Plaintiff further objects to this Request because it seeks information protected by the attorney-client privilege, and on the grounds that this Request invades protected litigation work product and would require disclosure of core opinion work product and mental impression of counsel, which is prohibited by 4:1(b)(3) of the Rules of the Virginia Supreme Court.

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

RESPONSE: Subject to and without waiving the objections and pursuant to Va. Sup. Ct. R. 4:1(b)(4), Defendant and Counterclaim Plaintiff stands on her objections to this Request. Pursuant to Va. Sup. Ct. R. 4:1(b)(4)(A)(iii) requiring a Court Order, Defendant and Counterclaim Plaintiff is willing to meet and confer with Plaintiff and Counterclaim Defendant on a mutual procedure by which both Defendant and Counterclaim Plaintiff and Plaintiff and Counterclaim Defendant mutually agree on a very limited production of documents, through a mutual Consent Order.

4. All Documents that memorialize, contain, or relate to the tests and test results conducted in connection with the “forensic psychological evaluation of Ms. Heard” referenced in Your Disclosure of Expert Witnesses.

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

limitations on the parties' resources, and the importance of the discovery in resolving the issues at stake in this litigation. Defendant and Counterclaim Plaintiff further objects to this Request because it seeks raw data from Dr. Hughes, which this Court held in its October 7, 2021 Order could be produced only to Dr. Curry, and that Plaintiff and Counterclaim Defendant's counsel could not have access to. Defendant and Counterclaim Plaintiff further objects to this Request because it seeks discovery of expert information through a document request, which is not permitted absent a Court Order, after finding good reason and then authorizing only very limited discovery under Va. Sup. Ct. R. 4:1(b)(4)(iii).

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

RESPONSE: Subject to and without waiving the objections and pursuant to Va. Sup. Ct. R. 4:1(b)(4), Defendant and Counterclaim Plaintiff stands on her objections to this Request. The information requested in this Request for Production has already been ruled on in this Court's October 7, 2021 Order.

5. All Documents that memorialize, refer, reflect, or relate to the "collateral interviews" with Ms. Heard's therapists, including Dr. Bonnie Jacobs and Dr. Connell Cowan, conducted in connection with the "forensic psychological evaluation of Ms. Heard" referenced in Your Disclosure of Expert Witnesses.

OBJECTION: Defendant and Counterclaim Plaintiff objects to the phrase "relate to" of this Request on the grounds that it is vague, ambiguous, and fails to define with particularity the information that it seeks, is overly broad, unduly burdensome, and seeks information not

reasonably calculated to lead to the discovery of admissible evidence regarding the claims and defenses in this case, taking into account the needs of the case, the amount in controversy, limitations on the parties' resources, and the importance of the discovery in resolving the issues at stake in this litigation. Defendant and Counterclaim Plaintiff further objects to this Request because it seeks discovery of expert information through a document request, which is not permitted absent a Court Order, after finding good reason and then authorizing only very limited discovery under Va. Sup. Ct. R. 4:1(b)(4)(iii).

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

RESPONSE: Subject to and without waiving the objections and pursuant to Va. Sup. Ct. R. 4:1(b)(4), Defendant and Counterclaim Plaintiff stands on her objections to this Request. Pursuant to Va. Sup. Ct. R. 4:1(b)(4)(A)(iii) requiring a Court Order, Defendant and Counterclaim Plaintiff is willing to meet and confer with Plaintiff and Counterclaim Defendant on a mutual procedure by which both Defendant and Counterclaim Plaintiff and Plaintiff and Counterclaim Defendant mutually agree on a very limited production of documents, through a mutual Consent Order.

6. All Documents that memorialize, refer, reflect, or relate to the “collateral interview” with Paige Heard in connection with the “forensic psychological evaluation of Ms. Heard” referenced in Your Disclosure of Expert Witnesses.

OBJECTION: Defendant and Counterclaim Plaintiff objects to the phrase “relate to” of this

Request on the grounds that it is vague, ambiguous, and fails to define with particularity the information that it seeks, is overly broad, unduly burdensome, and seeks information not reasonably calculated to lead to the discovery of admissible evidence regarding the claims and defenses in this case, taking into account the needs of the case, the amount in controversy, limitations on the parties' resources, and the importance of the discovery in resolving the issues at stake in this litigation. Defendant and Counterclaim Plaintiff further objects to this Request because it seeks discovery of expert information through a document request, which is not permitted absent a Court Order, after finding good reason and then authorizing only very limited discovery under Va. Sup. Ct. R. 4:1(b)(4)(iii).

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

RESPONSE: Subject to and without waiving the objections and pursuant to Va. Sup. Ct. R. 4:1(b)(4), Defendant and Counterclaim Plaintiff stands on her objections to this Request. Pursuant to Va. Sup. Ct. R. 4:1(b)(4)(A)(iii) requiring a Court Order, Defendant and Counterclaim Plaintiff is willing to meet and confer with Plaintiff and Counterclaim Defendant on a mutual procedure by which both Defendant and Counterclaim Plaintiff and Plaintiff and Counterclaim Defendant mutually agree on a very limited production of documents, through a mutual Consent Order.

7. All Documents and Communications prior to the commencement of Your relationship with Mr. Depp that memorialize, refer, reflect, or relate to any diagnosis of You with

any of the mental, emotional, or psychological disorders or harm referred to in Your Disclosure of Expert Witnesses, including without limitation the following: “posttraumatic stress disorder,” “stress, anxiety, nightmares, crying, flashbacks, feeling afraid, emotional numbing, dissociation, struggles with trusting others, significant sleep disruption, relationship and intimacy problems, interpersonal disconnection, hypervigilance, and intense psychological pain.”

OBJECTION: Defendant and Counterclaim Plaintiff objects to the phrases “relate to” and “referred to in Your Disclosure of Expert Witness” of this Request on the grounds that it is vague, ambiguous, and fails to define with particularity the information that it seeks, is overly broad, unduly burdensome, and seeks information not reasonably calculated to lead to the discovery of admissible evidence regarding the claims and defenses in this case, taking into account the needs of the case, the amount in controversy, limitations on the parties’ resources, and the importance of the discovery in resolving the issues at stake in this litigation. Defendant and Counterclaim Plaintiff further objects to this Request having no date limitation, despite the Court’s October 8, 2021 Order indicating that three years “prior to the alleged traumatic event” was the reasonable time period for medical records.

Defendant and Counterclaim Plaintiff further objects to this Request because it seeks discovery of expert information through a document request, which is not permitted absent a Court Order, after finding good reason and then authorizing only very limited discovery under Va. Sup. Ct. R. 4:1(b)(4)(iii).

Defendant and Counterclaim Plaintiff further objects to this Request on the grounds that it seeks documents that are not within Defendant and Counterclaim Plaintiff’s possession, custody or control. Defendant and Counterclaim Plaintiff further objects to this Request because Defendant and Counterclaim Plaintiff has provided HIPPA releases to Plaintiff and Counterclaim Defendant for medical information relevant to this case and have been sent to Defendant and Counterclaim Plaintiff’s medical providers, and this Request exceeds the scope of the Court’s

August 10, 2020 Order regarding that HIPAA release.

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

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

8. All Documents and Communications during or after Your relationship with Mr. Depp that memorialize, refer, reflect, or relate to any diagnosis of You with any of the mental, emotional, or psychological disorders or harm referred to in Your Disclosure of Expert Witnesses, including without limitation the following: “posttraumatic stress disorder”; “stress, anxiety, nightmares, crying, flashbacks, feeling afraid, emotional numbing, dissociation, struggles with trusting others, significant sleep disruption, relationship and intimacy problems, interpersonal disconnection, hypervigilance, and intense psychological pain.”

OBJECTION: Defendant and Counterclaim Plaintiff objects to the phrases “relate to” and “referred to in Your Disclosure of Expert Witness” of this Request on the grounds that it is vague, ambiguous, and fails to define with particularity the information that it seeks, is overly broad, unduly burdensome, and seeks information not reasonably calculated to lead to the discovery of admissible evidence regarding the claims and defenses in this case, taking into account the needs of the case, the amount in controversy, limitations on the parties’ resources, and the importance of the discovery in resolving the issues at stake in this litigation. Defendant and Counterclaim Plaintiff further objects to this Request on the grounds that it seeks documents that are not within Defendant and Counterclaim Plaintiff’s possession, custody or control. Defendant and Counterclaim Plaintiff further objects to this Request because Defendant and

Counterclaim Plaintiff has provided HIPAA releases to Plaintiff and Counterclaim Defendant for medical information relevant to this case and have been sent to Defendant and Counterclaim Plaintiff's medical providers, and the documents have already been produced, and this Request exceeds the scope of the Court's August 10, 2020 Order regarding that HIPAA release.

Defendant and Counterclaim Plaintiff further objects to this Request because it seeks discovery of expert information through a document request, which is not permitted absent a Court Order, after finding good reason and then authorizing only very limited discovery under Va. Sup. Ct. R. 4:1(b)(4)(iii).

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

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

9. All Documents and Communications that memorialize, contain, constitute, refer, reflect, or relate to any psychological or psychiatric evaluation of You prior to meeting Mr. Depp.

OBJECTION: Defendant and Counterclaim Plaintiff objects to the phrases "constitute" and "relate to" of this Request on the grounds that it is vague, ambiguous, and fails to define with particularity the information that it seeks, is overly broad, unduly burdensome, and seeks information not reasonably calculated to lead to the discovery of admissible evidence regarding the claims and defenses in this case, taking into account the needs of the case, the amount in

controversy, limitations on the parties' resources, and the importance of the discovery in resolving the issues at stake in this litigation. Defendant and Counterclaim Plaintiff further objects to this Request in seeking "any psychological or psychiatric evaluation of" Defendant and Counterclaim Plaintiff, as not all psychological or psychiatric evaluation of Defendant and Counterclaim Plaintiff are relevant to this case. For the same reasons, Defendant and Counterclaim Plaintiff further objects to this Request having no date limitation. Defendant and Counterclaim Plaintiff further objects to this Request on the grounds that responsive documents are obtainable from other sources that are more convenient, less burdensome, and less expensive. Defendant and Counterclaim Plaintiff further objects to this Request on the grounds that it seeks documents that are not within Defendant and Counterclaim Plaintiff's possession, custody or control. Defendant and Counterclaim Plaintiff further objects to this Request because Defendant and Counterclaim Plaintiff has provided HIPAA releases to Plaintiff and Counterclaim Defendant for medical information relevant to this case and have been sent to Defendant and Counterclaim Plaintiff's medical providers, and this Request exceeds the scope of the Court's August 10, 2020 Order regarding that HIPAA release. Defendant and Counterclaim Plaintiff further objects to this Request as duplicative of Request 7.

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

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

Request.

10. All Documents and Communications that memorialize, contain, constitute, refer, reflect, or relate to any psychological or psychiatric evaluation of You during Your relationship with Mr. Depp.

OBJECTION: Defendant and Counterclaim Plaintiff objects to the phrases “constitute” “relate to” of this Request on the grounds that it is vague, ambiguous, and fails to define with particularity the information that it seeks, is overly broad, unduly burdensome, and seeks information not reasonably calculated to lead to the discovery of admissible evidence regarding the claims and defenses in this case, taking into account the needs of the case, the amount in controversy, limitations on the parties’ resources, and the importance of the discovery in resolving the issues at stake in this litigation. Defendant and Counterclaim Plaintiff further objects to this Request in seeking “any psychological or psychiatric evaluation of” Defendant and Counterclaim Plaintiff, as not all psychological or psychiatric evaluation of Defendant and Counterclaim Plaintiff are relevant to this case. For the same reasons, Defendant and Counterclaim Plaintiff further objects to this Request having no date limitation. Defendant and Counterclaim Plaintiff further objects to this Request on the grounds that responsive documents are obtainable from other sources that are more convenient, less burdensome, and less expensive. Defendant and Counterclaim Plaintiff further objects to this Request on the grounds that it seeks documents that are not within Defendant and Counterclaim Plaintiff’s possession, custody or control. Defendant and Counterclaim Plaintiff further objects to this Request because Defendant and Counterclaim Plaintiff has provided HIPPA releases to Plaintiff and Counterclaim Defendant for medical information relevant to this case and have been sent to Defendant and Counterclaim Plaintiff’s medical providers, and the documents have already been produced, and this Request exceeds the scope of the Court’s August 10, 2020 Order regarding that HIPAA release.

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

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

11. All Documents and Communications that memorialize, contain, constitute, refer, reflect, or relate to any psychological or psychiatric evaluation of You at any time after You filed for divorce from Mr. Depp.

OBJECTION: Defendant and Counterclaim Plaintiff objects to the phrases “constitute” “relate to” of this Request on the grounds that it is vague, ambiguous, and fails to define with particularity the information that it seeks, is overly broad, unduly burdensome, and seeks information not reasonably calculated to lead to the discovery of admissible evidence regarding the claims and defenses in this case, taking into account the needs of the case, the amount in controversy, limitations on the parties’ resources, and the importance of the discovery in resolving the issues at stake in this litigation. Defendant and Counterclaim Plaintiff further objects to this Request in seeking “any psychological or psychiatric evaluation of” Defendant and Counterclaim Plaintiff, as not all psychological or psychiatric evaluation of Defendant and Counterclaim Plaintiff are relevant to this case. For the same reasons, Defendant and Counterclaim Plaintiff further objects to this Request having no date limitation. Defendant and Counterclaim Plaintiff further objects to this Request on the grounds that responsive documents are obtainable from other sources that are more convenient, less burdensome, and less expensive.

Defendant and Counterclaim Plaintiff further objects to this Request on the grounds that it seeks documents that are not within Defendant and Counterclaim Plaintiff's possession, custody or control. Defendant and Counterclaim Plaintiff further objects to this Request because Defendant and Counterclaim Plaintiff has provided HIPPA releases to Plaintiff and Counterclaim Defendant for medical information relevant to this case and have been sent to Defendant and Counterclaim Plaintiff's medical providers, and the documents have already been produced, and this Request exceeds the scope of the Court's August 10, 2020 Order regarding that HIPAA release.

Defendant and Counterclaim Plaintiff further objects to this Request because it seeks discovery of expert information through a document request, which is not permitted absent a Court Order, after finding good reason and then authorizing only very limited discovery under Va. Sup. Ct. R. 4:1(b)(4)(iii).

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

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

12. All Documents and Communications that evidence, refer, reflect, or relate to any physical, mental, or other abuse You have suffered at the hands of any other Person, including but not limited to the "abuse at a very young age" referenced by You in the Op-Ed.

OBJECTION: Defendant and Counterclaim Plaintiff objects to this Request, including the phrase "relate to," on the grounds that it is vague, ambiguous, and fails to define with

particularity the information that it seeks, is overly broad, unduly burdensome, and seeks information not reasonably calculated to lead to the discovery of admissible evidence regarding the claims and defenses in this case, taking into account the needs of the case, the amount in controversy, limitations on the parties' resources, and the importance of the discovery in resolving the issues at stake in this litigation. Defendant and Counterclaim Plaintiff further objects to this Request because it seeks discovery of expert information through a document request, which is not permitted absent a Court Order, after finding good reason and then authorizing only very limited discovery under Va. Sup. Ct. R. 4:1(b)(4)(iii).

Defendant and Counterclaim Plaintiff further objects to this Request because it exceeds the scope of the Court's August 10, 2020 Order regarding Defendant and Counterclaim Plaintiff's HIPAA release, and exceeds the scope of the Court's October 8, 2021 Order.

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

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

13. All Documents and Communications that evidence, refer, reflect, or relate to any physical, mental, or emotional injuries You have ever sustained as a result of any physical, mental, or other abuse at the hands of any other Person, including but not limited to the "abuse at a very young age" referenced by You in the Op-Ed.

OBJECTION: Defendant and Counterclaim Plaintiff objects to this Request, including the phrase "relate to," on the grounds that it is vague, ambiguous, and fails to define with

particularity the information that it seeks, is overly broad, unduly burdensome, and seeks information not reasonably calculated to lead to the discovery of admissible evidence regarding the claims and defenses in this case, taking into account the needs of the case, the amount in controversy, limitations on the parties' resources, and the importance of the discovery in resolving the issues at stake in this litigation. Defendant and Counterclaim Plaintiff further objects to this Request because it seeks discovery of expert information through a document request, which is not permitted absent a Court Order, after finding good reason and then authorizing only very limited discovery under Va. Sup. Ct. R. 4:1(b)(4)(iii).

Defendant and Counterclaim Plaintiff further objects to this Request because it exceeds the scope of the Court's August 10, 2020 Order regarding Defendant and Counterclaim Plaintiff's HIPAA release, and exceeds the scope of the Court's October 8, 2021 Order.

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

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

14. All Documents and Communications that evidence, refer, reflect, or relate to any diagnosis of You with any physical, mental, or emotional disorder or harm in connection with any abuse by any other Person (including but not limited to the "abuse at a very young age" referenced by You in the Op-Ed), to include without limitation any diagnosis of Post-Traumatic Stress Disorder.

OBJECTION: Defendant and Counterclaim Plaintiff objects to this Request, including the

phrase “relate to,” on the grounds that it is vague, ambiguous, and fails to define with particularity the information that it seeks, is overly broad, unduly burdensome, and seeks information not reasonably calculated to lead to the discovery of admissible evidence regarding the claims and defenses in this case, taking into account the needs of the case, the amount in controversy, limitations on the parties’ resources, and the importance of the discovery in resolving the issues at stake in this litigation. Defendant and Counterclaim Plaintiff further objects to this Request in seeking “any physical, mental, or emotional disorder of” Defendant and Counterclaim Plaintiff, as not all physical, mental, or emotional disorders of Defendant and Counterclaim Plaintiff are relevant to this case. For the same reasons, Defendant and Counterclaim Plaintiff further objects to this Request having no date limitation. Defendant and Counterclaim Plaintiff further objects to this Request because it exceeds the scope of the Court’s August 10, 2020 Order regarding Defendant and Counterclaim Plaintiff’s HIPAA release. Defendant and Counterclaim Plaintiff further objects to this Request on the grounds that responsive documents are obtainable from other sources that are more convenient, less burdensome, and less expensive. Defendant and Counterclaim Plaintiff further objects to this Request on the grounds that it seeks documents that are not within Defendant and Counterclaim Plaintiff’s possession, custody or control. Defendant and Counterclaim Plaintiff further objects to this Request because it seeks discovery of expert information through a document request, which is not permitted absent a Court Order, after finding good reason and then authorizing only very limited discovery under Va. Sup. Ct. R. 4:1(b)(4)(iii).

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

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

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

15. All Documents and Communications that evidence, refer, reflect, or relate to any treatment You have ever received for any mental or emotional harm in connection with any abuse by any other Person (including but not limited to the “abuse at a very young age” referenced by You in the Op-Ed), including but not limited to any diagnosis of Post-Traumatic Stress Disorder.

OBJECTION: Defendant and Counterclaim Plaintiff objects to this Request, including the phrase “relate to,” on the grounds that it is vague, ambiguous, and fails to define with particularity the information that it seeks, is overly broad, unduly burdensome, and seeks information not reasonably calculated to lead to the discovery of admissible evidence regarding the claims and defenses in this case, taking into account the needs of the case, the amount in controversy, limitations on the parties’ resources, and the importance of the discovery in resolving the issues at stake in this litigation. Defendant and Counterclaim Plaintiff further objects to this Request in seeking “any mental or emotional harm in connection with any abuse by any other Person” of Defendant and Counterclaim Plaintiff, as not all mental or emotional harm in connection with any abuse by any other Person of Defendant and Counterclaim Plaintiff is relevant to this case. For the same reasons, Defendant and Counterclaim Plaintiff further objects to this Request having no date limitation. Defendant and Counterclaim Plaintiff further objects to this Request because it exceeds the scope of the Court’s August 10, 2020 Order regarding Defendant and Counterclaim Plaintiff’s HIPAA release. Defendant and Counterclaim Plaintiff further objects to this Request on the grounds that responsive documents are obtainable

from other sources that are more convenient, less burdensome, and less expensive. Defendant and Counterclaim Plaintiff further objects to this Request on the grounds that it seeks documents that are not within Defendant and Counterclaim Plaintiff's possession, custody or control.

Defendant and Counterclaim Plaintiff further objects to this Request because it seeks discovery of expert information through a document request, which is not permitted absent a Court Order, after finding good reason and then authorizing only very limited discovery under Va. Sup. Ct. R. 4:1(b)(4)(iii).

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

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

16. All Documents and Communications that refer, reflect, or relate to any treatment of You by any therapist, including without limitation Dr. Bonnie Jacobs and Dr. Connell Cowan.

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

resolving the issues at stake in this litigation. Defendant and Counterclaim Plaintiff further objects to this Request in seeking “any treatment of You by any therapist” for all of time, as not all therapy of Defendant and Counterclaim Plaintiff is relevant to this case. For the same reasons, Defendant and Counterclaim Plaintiff further objects to this Request having no date limitation. Defendant and Counterclaim Plaintiff further objects to this Request on the grounds that responsive documents are obtainable from other sources that are more convenient, less burdensome, and less expensive. Defendant and Counterclaim Plaintiff further objects to this Request on the grounds that it seeks documents that are not within Defendant and Counterclaim Plaintiff’s possession, custody or control. Defendant and Counterclaim Plaintiff further objects to this Request because Defendant and Counterclaim Plaintiff has provided HIPPA releases to Plaintiff and Counterclaim Defendant for medical information relevant to this case and have been sent to Defendant and Counterclaim Plaintiff’s medical providers, and the documents have already been produced, and this Request exceeds the scope of the Court’s August 10, 2020 Order regarding that HIPAA release. Defendant and Counterclaim Plaintiff further objects to this Request to the extent it seeks discovery of expert information through a document request, but absent a Court Order discovery of facts known and opinions held by experts is only authorized through Interrogatories and depositions as provided in Va. Sup. Ct. R. 4:1(b)(4).

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

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

17. All Documents and Communications (including Documents and Communications prior to, during, or after Your relationship with Mr. Depp) that refer, reflect, or relate to any treatment for mental health issues, including prescription and management of psychotropic medication by any provider; emergency room, urgent care, or other physician/nurse/EMT encounters related to self-harming behavior and/or attempted suicide, drug or alcohol consumption, or physiological symptoms of panic or anxiety (including any of the following: exhaustion, dissociation, feelings of unreality or of being disconnected from one's body, racing heart or heart palpitations, chest pain, extreme fear, confusion, acute muscle pain or cramping, temporary paralysis, numbness in any extremities, sudden sensations of hot or cold, shooting pains, shaking, sweating, dizziness, lightheadedness and/or fainting); therapy services provided on an individual, couples or group basis; church or faith-based counseling; psychiatric holds (5150, etc.) at any hospital or other facility; participation for any amount of time in intensive outpatient programming, partial hospitalization programming, or residential treatment programming of You, carried out by any provider (counselor, clergy, therapist, social worker, psychiatrist, nurse, nurse practitioner, or other physician).

OBJECTION: Defendant and Counterclaim Plaintiff objects to this Request, including the phrase “relate to,” on the grounds that it is vague, ambiguous, and fails to define with particularity the information that it seeks, is overly broad, unduly burdensome, and seeks information not reasonably calculated to lead to the discovery of admissible evidence regarding the claims and defenses in this case, taking into account the needs of the case, the amount in controversy, limitations on the parties’ resources, and the importance of the discovery in resolving the issues at stake in this litigation. For the same reasons, Defendant and Counterclaim Plaintiff further objects to the phrases “therapy services provided on an individual, couples, or group basis; church or faith based counseling,” and “clergy” of this Request. Defendant and Counterclaim Plaintiff further objects to this Request seeking documents for all of time and having no date limitation. Defendant and Counterclaim Plaintiff further objects to this Request on the grounds that responsive documents are obtainable from other sources that are more convenient, less burdensome, and less expensive. Defendant and Counterclaim Plaintiff

further objects to this Request on the grounds that it seeks documents that are not within Defendant and Counterclaim Plaintiff's possession, custody or control. Defendant and Counterclaim Plaintiff further objects to this Request because Defendant and Counterclaim Plaintiff has provided HIPAA releases to Plaintiff and Counterclaim Defendant for medical information relevant to this case and have been sent to Defendant and Counterclaim Plaintiff's medical providers, and the documents have already been produced, and this Request exceeds the scope of the Court's August 10, 2020 Order regarding that HIPAA release. Defendant and Counterclaim Plaintiff further objects to this Request because it seeks discovery of expert information through a document request, which is not permitted absent a Court Order, after finding good reason and then authorizing only very limited discovery under Va. Sup. Ct. R. 4:1(b)(4)(iii).

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

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

18. All Documents and Communications reflecting or relating to the raw data associated with the "forensic psychological evaluation" of Ms. Heard referenced in Your Disclosure of Expert Witnesses and sought by Mr. Depp via the Order on Mr. Depp's Motion to Compel an Independent Examination of Ms. Heard, a copy of which is attached as Exhibit "1."

OBJECTION: Defendant and Counterclaim Plaintiff objects to this Request, including the

phrase “relate to,” on the grounds that it is vague, ambiguous, and fails to define with particularity the information that it seeks, is overly broad, unduly burdensome, and seeks information not reasonably calculated to lead to the discovery of admissible evidence regarding the claims and defenses in this case, taking into account the needs of the case, the amount in controversy, limitations on the parties’ resources, and the importance of the discovery in resolving the issues at stake in this litigation. Defendant and Counterclaim Plaintiff objects to this Request because it seeks raw data from Dr. Hughes, which this Court held in its October 7, 2021 Order could be produced only to Dr. Curry, and that Plaintiff and Counterclaim Defendant’s counsel could not have access to. Defendant and Counterclaim Plaintiff further objects to this Request because it seeks discovery of expert information through a document request, which is not permitted absent a Court Order, after finding good reason and then authorizing only very limited discovery under Va. Sup. Ct. R. 4:1(b)(4)(iii).

Defendant and Counterclaim Plaintiff further objects on the grounds that there is no Exhibit 1 attached to the Requests.

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

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

19. All Documents and Communications that evidence or reflect any loss of income

You have incurred as a result of any conduct by Mr. Depp and/or Adam Waldman alleged in Your Counterclaim.

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

On July 24, 2020 the Court ruled that Request No. 14 of Ms. Heard's 2nd Request for Documents seeking "income from all sources from 2010 to the present" was overbroad because "those types of things aren't anything that would be helpful in this case," along with ruling that discovery seeking "outflow, what his expenses are and whether he spends more money than he makes" was overbroad and beyond the scope of relevant discovery in this case. The Court also ruled that Request 16 of Ms. Heard's 2nd Request for Documents seeking all transactions from January 1, 2010 to the present with a list of individuals was "overly broad" and beyond the scope of discovery in this case unless these individuals were "going to be potential witnesses" in the case. On September 18, 2020 the Court ruled that Request Nos. 1-6 and 8 of Ms. Heard's 7th Requests for Documents and Request Nos. 1, 3, 5, and 7 of Ms. Heard's 7th Requests seeking financial related documents during the parties' marriage and related to the divorce case was overbroad and beyond the scope of relevant discovery in this case because "its denied under the doctrine of enough is enough. You all have been through the divorce already. We're not going to retry that divorce in this case." Also on September 18, 2020 the Court specifically defined the

narrow scope of relevant tax-return discovery in this case as only requiring “the documents which show the gross income...The supporting documents are not to be produced,” and further Ordered that only “the amount of income” from the tax returns is relevant and that only involved “limited parts of [the tax return] that would show the income.” The Court reiterated this scope of tax-return discovery on November 20 when it further ruled that only the “return pages” of tax returns needed to be produced, and “the supplementary documents that are attached to” the returns were beyond the scope of relevant discovery in this case. Any other tax-related documents are therefore beyond the scope of relevant discovery in this case. These Orders should apply the same to these Requests for Production to Defendant and Counterclaim Plaintiff. Defendant and Counterclaim Plaintiff further objects to this Request it seeks documents that have already been produced. Defendant and Counterclaim Plaintiff further objects to this Request, including based on its referral to the entire Counterclaim within one Request, on the grounds that it is vague, ambiguous, and fails to define with particularity the information that it seeks, is overly broad, unduly burdensome, and seeks information not reasonably calculated to lead to the discovery of admissible evidence regarding the claims and defenses in this case, taking into account the needs of the case, the amount in controversy, limitations on the parties’ resources, and the importance of the discovery in resolving the issues at stake in this litigation. Defendant and Counterclaim Plaintiff further objects to this Request because it seeks discovery of expert information through a document request, which is not permitted absent a Court Order, after finding good reason and then authorizing only very limited discovery under Va. Sup. Ct. R. 4:1(b)(4)(iii).

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

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

RESPONSE: Subject to and without waiving the objections, Defendant and Counterclaim Plaintiff has already produced documents related to her damages in the Counterclaims. Defendant and Counterclaim Plaintiff stands on her objections to this vague, overbroad and unduly burdensome Request.

20. All Documents that evidence or reflect any “press requests,” as that term is used in Your Disclosure of Expert Witnesses, from January 1, 2010 through and including the present.

OBJECTION: Defendant and Counterclaim Plaintiff objects to this Request on the grounds that it is vague, ambiguous, and fails to define with particularity the information that it seeks, is overly broad, unduly burdensome, and seeks information not reasonably calculated to lead to the discovery of admissible evidence regarding the claims and defenses in this case, taking into account the needs of the case, the amount in controversy, limitations on the parties’ resources, and the importance of the discovery in resolving the issues at stake in this litigation. Defendant and Counterclaim Plaintiff further objects to this Request it seeks documents that have already been produced. Defendant and Counterclaim Plaintiff further objects to this Request because it seeks discovery of expert information through a document request, which is not permitted absent a Court Order, after finding good reason and then authorizing only very limited discovery under Va. Sup. Ct. R. 4:1(b)(4)(iii).

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

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

RESPONSE: Subject to and without waiving the objections and pursuant to Va. Sup. Ct. R. 4:1(b)(4), Defendant and Counterclaim Plaintiff stands on her objections to this Request. Pursuant to Va. Sup. Ct. R. 4:1(b)(4)(A)(iii) requiring a Court Order, Defendant and Counterclaim Plaintiff is willing to meet and confer with Plaintiff and Counterclaim Defendant on a mutual procedure by which both Defendant and Counterclaim Plaintiff and Plaintiff and Counterclaim Defendant mutually agree on a very limited production of documents, through a mutual Consent Order.

21. All Documents and Communications that evidence or reflect any “endorsement deals” (as that term is used in Your Disclosure of Expert Witnesses) You have entered into from January 1, 2010 through and including the present.

OBJECTION: Defendant and Counterclaim Plaintiff objects to this Request on the grounds that it is vague, ambiguous, and fails to define with particularity the information that it seeks, is overly broad, unduly burdensome, and seeks information not reasonably calculated to lead to the discovery of admissible evidence regarding the claims and defenses in this case, taking into account the needs of the case, the amount in controversy, limitations on the parties’ resources, and the importance of the discovery in resolving the issues at stake in this litigation. Defendant and Counterclaim Plaintiff further objects to this Request it seeks documents that have already been produced. Defendant and Counterclaim Plaintiff further objects to this Request because it seeks discovery of expert information through a document request, which is not permitted absent a Court Order, after finding good reason and then authorizing only very limited discovery under

Va. Sup. Ct. R. 4:1(b)(4)(iii).

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

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

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

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

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

RESPONSE: Subject to and without waiving the objections and pursuant to Va. Sup. Ct. R. 4:1(b)(4), Defendant and Counterclaim Plaintiff stands on her objections to this Request. Pursuant to Va. Sup. Ct. R. 4:1(b)(4)(A)(iii) requiring a Court Order, Defendant and Counterclaim Plaintiff is willing to meet and confer with Plaintiff and Counterclaim Defendant on a mutual procedure by which both Defendant and Counterclaim Plaintiff and Plaintiff and Counterclaim Defendant mutually agree on a very limited production of documents, through a mutual Consent Order. Defendant and Counterclaim Plaintiff is further willing to meet and confer with Plaintiff and Counterclaim Defendant regarding the scope of this overbroad and unduly burdensome Request.

22. All Documents that support, evidence, or reflect any of the “lost career opportunities” referenced in Your Disclosure of Expert Witnesses.

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

and the importance of the discovery in resolving the issues at stake in this litigation. Defendant and Counterclaim Plaintiff further objects to this Request it seeks documents that have already been produced. Defendant and Counterclaim Plaintiff further objects to this Request because it seeks discovery of expert information through a document request, which is not permitted absent a Court Order, after finding good reason and then authorizing only very limited discovery under Va. Sup. Ct. R. 4:1(b)(4)(iii).

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

RESPONSE: Subject to and without waiving the objections and pursuant to Va. Sup. Ct. R. 4:1(b)(4), Defendant and Counterclaim Plaintiff stands on her objections to this Request. Pursuant to Va. Sup. Ct. R. 4:1(b)(4)(A)(iii) requiring a Court Order, Defendant and Counterclaim Plaintiff is willing to meet and confer with Plaintiff and Counterclaim Defendant on a mutual procedure by which both Defendant and Counterclaim Plaintiff and Plaintiff and Counterclaim Defendant mutually agree on a very limited production of documents, through a mutual Consent Order. Defendant and Counterclaim Plaintiff is further willing to meet and confer with Plaintiff and Counterclaim Defendant regarding the scope of this overbroad and unduly burdensome Request.

23. All Documents evidencing Your compensation from any endorsement deals, including without limitation any agreements with L’Oreal.

OBJECTION: Defendant and Counterclaim Plaintiff objects to this Request on the

grounds that it is vague, ambiguous, and fails to define with particularity the information that it seeks, is overly broad, unduly burdensome, harassing, and seeks information not reasonably calculated to lead to the discovery of admissible evidence regarding the claims and defenses in this case, taking into account the needs of the case, the amount in controversy, limitations on the parties' resources, and the importance of the discovery in resolving the issues at stake in this litigation. Defendant and Counterclaim Plaintiff further objects to this Request it seeks documents that have already been produced.

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

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

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

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

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

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

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

RESPONSE: Subject to and without waiving the objections, and notwithstanding that Defendant and Counterclaim Plaintiff has produced documents potentially responsive to this overbroad and unduly burdensome Request, Defendant and Counterclaim Plaintiff stands on her objections to this Request, except that she has produced her contract(s) with L'Oreal and documents within the scope of the Court's Orders regarding tax-return discovery.

24. All Documents evidencing Your compensation from any endorsement deals, including without limitation any agreements with L'Oreal.

OBJECTION: Defendant and Counterclaim Plaintiff objects to this Request on the grounds that it is vague, ambiguous, and fails to define with particularity the information that it seeks, is overly broad, unduly burdensome, harassing, and seeks information not reasonably calculated to lead to the discovery of admissible evidence regarding the claims and defenses in this case, taking into account the needs of the case, the amount in controversy, limitations on the parties' resources, and the importance of the discovery in resolving the issues at stake in this litigation. Defendant and Counterclaim Plaintiff further objects to this Request as it seeks documents that have already been produced.

Defendant and Counterclaim Plaintiff further objects to this Request seeking financial information on the grounds that it is vague, ambiguous, and fails to define with particularity the information that it seeks, and is overly broad, unduly burdensome, harassing, and seeks

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

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

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

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

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

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

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

RESPONSE: Subject to and without waiving the objections, and notwithstanding that Defendant and Counterclaim Plaintiff has produced documents potentially responsive to this overbroad and unduly burdensome Request, Defendant and Counterclaim Plaintiff stands on her

objections to this Request, except that she has produced her contract(s) with L'Oreal and documents within the scope of the Court's Orders regarding tax-return discovery.

25. All Documents that support, reflect, or relate to Your contention that You have "received critical and box office acclaim," as stated in Your Disclosure of Expert Witnesses.

OBJECTION: Defendant and Counterclaim Plaintiff objects to this Request, including the phrase "relate to," of this Request on the grounds that it is vague, ambiguous, and fails to define with particularity the information that it seeks, is overly broad, unduly burdensome, and seeks information not reasonably calculated to lead to the discovery of admissible evidence regarding the claims and defenses in this case, taking into account the needs of the case, the amount in controversy, limitations on the parties' resources, and the importance of the discovery in resolving the issues at stake in this litigation. Defendant and Counterclaim Plaintiff further objects to this Request as it seeks documents that have already been produced. Defendant and Counterclaim Plaintiff further objects to this Request because it seeks discovery of expert information through a document request, which is not permitted absent a Court Order, after finding good reason and then authorizing only very limited discovery under Va. Sup. Ct. R. 4:1(b)(4)(iii).

Defendant and Counterclaim Plaintiff objects to this Request on the grounds that it is obtainable from other sources that are more convenient, less burdensome, and less expensive.

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

showing under the Rules.

RESPONSE: Subject to and without waiving the objections, and notwithstanding that Defendant and Counterclaim Plaintiff has produced documents potentially responsive to this overbroad and unduly burdensome Request, Defendant and Counterclaim Plaintiff stands on her objections to this Request.

26. All Documents that contain, constitute, refer, reflect, or relate to any reviews of You or Your performance in any film or television program, from January 1, 2010 through and including the present.

OBJECTION: Defendant and Counterclaim Plaintiff objects to this Request, including the phrases “constitute” and “relate to,” on the grounds that they are vague, ambiguous, and fails to define with particularity the information that it seeks, is overly broad, unduly burdensome, harassing, and seeks information not reasonably calculated to lead to the discovery of admissible evidence regarding the claims and defenses in this case, taking into account the needs of the case, the amount in controversy, limitations on the parties’ resources, and the importance of the discovery in resolving the issues at stake in this litigation. Defendant and Counterclaim Plaintiff further objects to this Request as it seeks documents that have already been produced. Defendant and Counterclaim Plaintiff objects to this Request on the grounds that it is obtainable from other sources that are more convenient, less burdensome, and less expensive.

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

RESPONSE: Subject to and without waiving the objections, and notwithstanding that Defendant and Counterclaim Plaintiff has produced documents potentially responsive to this overbroad and unduly burdensome Request, Defendant and Counterclaim Plaintiff stands on her objections to this Request.

27. All Documents that memorialize, refer, reflect, or relate to the financial success or failure of any film or television program in which You have given a performance, from January 1, 2010 through and including the present.

OBJECTION: Defendant and Counterclaim Plaintiff objects to this Request, including the phrase "relate to," on the grounds that it is vague, ambiguous, and fails to define with particularity the information that it seeks, is overly broad, unduly burdensome, harassing, and seeks information not reasonably calculated to lead to the discovery of admissible evidence regarding the claims and defenses in this case, taking into account the needs of the case, the amount in controversy, limitations on the parties' resources, and the importance of the discovery in resolving the issues at stake in this litigation. Defendant and Counterclaim Plaintiff further objects to this Request as it seeks documents that have already been produced. Defendant and Counterclaim Plaintiff objects to this Request on the grounds that it is obtainable from other sources that are more convenient, less burdensome, and less expensive.

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

RESPONSE: Subject to and without waiving the objections, and notwithstanding that

Defendant and Counterclaim Plaintiff has produced documents potentially responsive to this overbroad and unduly burdensome Request, Defendant and Counterclaim Plaintiff stands on her objections to this Request.

28. All Documents and Communications that discuss, mention, or relate to any of the eight statements that form the basis of Your Counterclaim for defamation.

OBJECTION: Defendant and Counterclaim Plaintiff objects to this Request, including the phrase “relate to,” on the grounds that it is vague, ambiguous, and fails to define with particularity the information that it seeks, is overly broad, unduly burdensome, harassing, and seeks information not reasonably calculated to lead to the discovery of admissible evidence regarding the claims and defenses in this case, taking into account the needs of the case, the amount in controversy, limitations on the parties’ resources, and the importance of the discovery in resolving the issues at stake in this litigation. Defendant and Counterclaim Plaintiff objects to this Request on the grounds that it is obtainable from other sources that are more convenient, less burdensome, and less expensive. Defendant and Counterclaim Plaintiff further objects because Plaintiff and Counterclaim Defendant has repeatedly taken the position in response to Defendant and Counterclaim Plaintiff’s Requests that it will only produce documents related to the statements forming the basis of the Counterclaim for defamation that survived *demurrer* and are going to trial- Plaintiff and Counterclaim Defendant cannot have it both ways. Defendant and Counterclaim Plaintiff further objects to this Request as it seeks documents that have already been produced.

Defendant and Counterclaim Plaintiff further objects to this Request because it seeks discovery of expert information through a document request, which is not permitted absent a Court Order, after finding good reason and then authorizing only very limited discovery under Va. Sup. Ct. R. 4:1(b)(4)(iii).

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

RESPONSE: Subject to and without waiving the objections, and notwithstanding that Defendant and Counterclaim Plaintiff has produced documents potentially responsive to this overbroad and unduly burdensome Request, Defendant and Counterclaim Plaintiff stands on her objections to this Request.

29. All Communications between You and anyone acting on Your behalf, on the one hand, and any actual or potential source of employment or income, on the other hand (including without limitation film studios), related to any of the eight statements that form the basis of Your Counterclaim for defamation.

OBJECTION: Defendant and Counterclaim Plaintiff objects to this Request, including the phrase “relate to,” on the grounds that it is vague, ambiguous, and fails to define with particularity the information that it seeks, is overly broad, unduly burdensome, harassing, and seeks information not reasonably calculated to lead to the discovery of admissible evidence regarding the claims and defenses in this case, taking into account the needs of the case, the amount in controversy, limitations on the parties’ resources, and the importance of the discovery in resolving the issues at stake in this litigation. Defendant and Counterclaim Plaintiff objects to this Request on the grounds that it is obtainable from other sources that are more convenient, less burdensome, and less expensive. Defendant and Counterclaim Plaintiff further objects because Plaintiff and Counterclaim Defendant has repeatedly taken the position in response to Defendant

and Counterclaim Plaintiff's Requests that it will only produce documents related to the statements forming the basis of the Counterclaim for defamation that survived *demurrer* and are going to trial- Plaintiff and Counterclaim Defendant cannot have it both ways. Defendant and Counterclaim Plaintiff further objects to this Request as it seeks documents that have already been produced.

Defendant and Counterclaim Plaintiff further objects to this Request because it seeks discovery of expert information through a document request, which is not permitted absent a Court Order, after finding good reason and then authorizing only very limited discovery under Va. Sup. Ct. R. 4:1(b)(4)(iii).

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

RESPONSE: Subject to and without waiving the objections, and notwithstanding that Defendant and Counterclaim Plaintiff has produced documents potentially responsive to this overbroad and unduly burdensome Request, Defendant and Counterclaim Plaintiff stands on her objections to this Request.

30. All Communications between You and anyone acting on Your behalf, on the one hand, and any actual or potential source of employment or income, on the other hand (including without limitation film studios), related to Mr. Depp's Complaint and allegations in this Action.

OBJECTION: Defendant and Counterclaim Plaintiff objects to this Request, including the phrase "relate to," on the grounds that it is vague, ambiguous, and fails to define with

particularity the information that it seeks, is overly broad, unduly burdensome, harassing, and seeks information not reasonably calculated to lead to the discovery of admissible evidence regarding the claims and defenses in this case, taking into account the needs of the case, the amount in controversy, limitations on the parties' resources, and the importance of the discovery in resolving the issues at stake in this litigation. Defendant and Counterclaim Plaintiff objects to this Request on the grounds that it is obtainable from other sources that are more convenient, less burdensome, and less expensive. Defendant and Counterclaim Plaintiff further objects to this Request as it seeks documents that have already been produced

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

RESPONSE: Subject to and without waiving the objections, Plaintiff is not aware of any documents responsive to this Request.

31. All Communications between You and anyone acting on Your behalf, on the one hand, and any actual or potential source of employment or income, on the other hand (including without limitation film studios), related to Mr. Depp's allegations in the U.K. Action.

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

amount in controversy, limitations on the parties' resources, and the importance of the discovery in resolving the issues at stake in this litigation. Defendant and Counterclaim Plaintiff objects to this Request on the grounds that it is obtainable from other sources that are more convenient, less burdensome, and less expensive. Defendant and Counterclaim Plaintiff further objects to this Request as it seeks documents that have already been produced.

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

On November 20, 2020 the Court ruled that discovery seeking documents "sufficient to reflect the impact" of the UK litigation "on Mr. Depp's reputation and career" was overly broad, unduly burdensome, and unreasonably vague, and therefore beyond the scope of discovery in this case. On December 18, 2020 the Court ruled that Request No. 23 of Mr. Depp's 1st Requests for Documents and Request 50 of Mr. Depp's 3rd Requests for Documents seeking all documents and communications between Ms. Heard and The Sun/NGN was overbroad, and therefore beyond the scope of relevant discovery in this case. The Court also ruled that Request No. 51 of Mr. Depp's 3rd Requests for Documents seeking all documents and communications relating to the UK Action was also overbroad, and therefore beyond the scope of discovery in this case.

These Orders should apply the same to these Requests for Production to Defendant and Counterclaim Plaintiff.

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

RESPONSE: Subject to and without waiving the objections, and notwithstanding that Defendant and Counterclaim Plaintiff has produced documents potentially responsive to this overbroad and unduly burdensome Request, Defendant and Counterclaim Plaintiff stands on her objections to this Request.

32. All Communications between You and anyone acting on Your behalf, on the one hand, and any actual or potential source of employment or income, on the other hand (including without limitation film studios), related to Adam Waldman.

OBJECTION: Defendant and Counterclaim Plaintiff objects to this Request, including the phrase “relate to,” on the grounds that it is vague, ambiguous, and fails to define with particularity the information that it seeks, is overly broad, unduly burdensome, harassing, and seeks information not reasonably calculated to lead to the discovery of admissible evidence regarding the claims and defenses in this case, taking into account the needs of the case, the amount in controversy, limitations on the parties’ resources, and the importance of the discovery in resolving the issues at stake in this litigation. Defendant and Counterclaim Plaintiff objects to this Request on the grounds that it is obtainable from other sources that are more convenient, less burdensome, and less expensive. Defendant and Counterclaim Plaintiff further objects to this

Request as it seeks documents that have already been produced.

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

RESPONSE: Subject to and without waiving the objections, and notwithstanding that Defendant and Counterclaim Plaintiff has produced documents potentially responsive to this vague, overbroad and unduly burdensome Request, Defendant and Counterclaim Plaintiff stands on her objections to this Request.

33. All Communications concerning Your relationship with Mr. Depp between You, on the one hand, and any of the following Persons, on the other hand, from January 1, 2014 through and including the present: Whitney Henriquez, iO Tillett Wright, Raquel Pennington, Kristina Sexton, Amanda de Cadenet, and Joshua Drew.

OBJECTION: Defendant and Counterclaim Plaintiff objects to this Request, including the phrase "relate to," on the grounds that it is vague, ambiguous, and fails to define with particularity the information that it seeks, is overly broad, unduly burdensome, harassing, and seeks information not reasonably calculated to lead to the discovery of admissible evidence regarding the claims and defenses in this case, taking into account the needs of the case, the amount in controversy, limitations on the parties' resources, and the importance of the discovery in resolving the issues at stake in this litigation. Defendant and Counterclaim Plaintiff objects to this Request on the grounds that it is obtainable from other sources that are more convenient, less burdensome, and less expensive. Defendant and Counterclaim Plaintiff further objects to this Request as it seeks documents that have already been produced.

This Request is also overbroad and unduly burdensome to the point of harassment, is not calculated to lead to the discovery of information relevant to the subject matter of this action, and seeks information related to matters beyond the scope of the asserted claims and defenses in this suit because on December 18, 2020, the Fairfax County Circuit Court ruled that Request 43 of Mr. Depp's 3rd Requests for Documents seeking all communications between Ms. Heard and anyone relating to her relationship with Mr. Depp, claims of abuse or violence involving Mr. Depp, and injuries Ms. Heard contends she suffered as a result of Mr. Depp's conduct was overbroad, and therefore held that Request and this Request are beyond the scope of discovery in this case. The Fairfax County Circuit Court also ruled that Request 52 of Mr. Depp's 3rd Requests for Documents seeking all documents and communications relating to Ms. Heard's "relationship with Mr. Depp" was also overbroad, and therefore held that Request and this Request are beyond the scope of discovery in this case. These Orders should apply the same to these Requests for Production to Defendant and Counterclaim Plaintiff.

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

RESPONSE: Subject to and without waiving the objections, and notwithstanding that Defendant and Counterclaim Plaintiff has produced documents potentially responsive to this overbroad and unduly burdensome Request, Defendant and Counterclaim Plaintiff stands on her objections to this Request.

November 24, 2021

AS TO OBJECTIONS:



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@cbcbllaw.com
anadelhaft@cbcbllaw.com
dmurphy@cbcbllaw.com

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
brottenborn@woodsrogers.com
jtreece@woodsrogers.com

*Counsel to Defendant and Counterclaim
Plaintiff Amber Laura Heard*

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing was served this 24th day of November, 2021, 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
acrawford@brownrudnick.com

Camille M. Vasquez, Esq.
BROWN RUDNICK LLP
2211 Michelson Drive
Irvine, CA 92612
Telephone: (949) 752-7100
Facsimile: (949) 252-1514
cvasquez@brownrudnick.com

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



Elaine Charlson Bredehoft

VIRGINIA:

IN THE CIRCUIT COURT OF FAIRFAX COUNTY

| | | |
|--------------------------------|---|--|
| John C. Depp, II, |) | |
| |) | |
| Plaintiff and |) | |
| Counterclaim Defendant, |) | |
| v. |) | Civil Action No.: CL-2019-0002911 |
| |) | |
| Amber Laura Heard, |) | |
| |) | |
| Defendant and |) | |
| Counterclaim Plaintiff. |) | |

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

Pursuant to Rule 4:9 of the Rules of the Supreme Court of Virginia ("Rules"), Defendant and Counterclaim Plaintiff Amber Laura Heard, by and through her attorneys, submits these objections and responses (the "Responses") to Plaintiff and Counterclaim Defendant John C. Depp, II's Eleventh Set of Requests for Production dated November 3, 2021 (the "Requests").

GENERAL OBJECTIONS

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

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

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

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

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

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

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

7. Defendant and Counterclaim Plaintiff objects to the Requests to the extent they require unreasonable or unduly burdensome measures to locate and produce responsive documents. Defendant and Counterclaim Plaintiff will construe the Requests to require a reasonable and diligent search of reasonably-accessible files within her possession, custody, or control where she would reasonably expect to find information, documents, or things related to the Requests.

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

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

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

11. Defendant and Counterclaim Plaintiff expressly reserves all rights and privileges under the Rules and any other applicable law or rule. The failure to assert such rights and

privileges or the inadvertent disclosure by Defendant and Counterclaim Plaintiff of information or documents protected by such rights or privileges shall not constitute a waiver thereof, either with respect to these Responses or with respect to any future discovery objections or responses. Defendant and Counterclaim Plaintiff's Responses to the Requests are made to the best of her present knowledge, information, and belief. These Responses are at all times subject to such additional or different documents and information that discovery or further investigation may disclose and, while based on the present state of Defendant and Counterclaim Plaintiff's knowledge and investigation, are subject to such additional knowledge of facts as may result from Defendant and Counterclaim Plaintiff's further discovery or investigation.

OBJECTIONS TO DEFINITIONS

1. Defendant and Counterclaim Plaintiff objects to Definition No. 2 on the grounds that it is overly broad, unduly burdensome, and seeks documents not reasonably calculated to lead to the discovery of admissible evidence regarding the claims and defenses in this case, taking into account the needs of the case, the amount in controversy, limitations on the parties' resources, and the importance of the discovery in resolving the issues at stake in the litigation to the extent it seeks documents beyond the scope of Va. Sup. Ct. R. 4:9(a). Since a "Chat Application" is a form of a "Document," Defendant and Counterclaim Plaintiff will interpret the phrase "Chat Application" in accordance with the definition included in Va. Sup. Ct. R. 4:9(a).

2. Defendant and Counterclaim Plaintiff objects to Definition No. 3 on the grounds that it is overly broad, unduly burdensome, and seeks documents not reasonably calculated to lead to the discovery of admissible evidence regarding the claims and defenses in this case, taking into account the needs of the case, the amount in controversy, limitations on the parties'

resources, and the importance of the discovery in resolving the issues at stake in the litigation to the extent it seeks documents beyond the scope of Va. Sup. Ct. R. 4:9(a). Since a “Communication” is a form of a “Document,” Defendant and Counterclaim Plaintiff will interpret the word “Communication” in accordance with the definition included in Va. Sup. Ct. R. 4:9(a). Defendant and Counterclaim Plaintiff further objects to this Definition to the extent it seeks documents and information protected by the attorney-client privilege, and on the grounds that this Definition invades protected litigation work product and would require disclosure of core opinion work product and mental impression of counsel, which is prohibited by 4:1(b)(3) of the Rules of the Virginia Supreme Court. Plaintiff and Counterclaim Defendant has not made the requisite showing under the Rules.

3. Defendant and Counterclaim Plaintiff objects to Definition No. 4 on the grounds that it is overly broad, unduly burdensome, and seeks documents not reasonably calculated to lead to the discovery of admissible evidence regarding the claims and defenses in this case, taking into account the needs of the case, the amount in controversy, limitations on the parties’ resources, and the importance of the discovery in resolving the issues at stake in the litigation. On September 18, 2020, the Fairfax County Circuit Court ruled that Request Nos. 1-6 and 8 of Ms. Heard’s 6th Requests for Documents and Request Nos. 1, 3, 5, and 7 of Ms. Heard’s 7th Requests seeking documents during the parties’ marriage and related to the divorce litigation was overbroad and beyond the scope of relevant discovery in this case because “its denied under the doctrine of enough is enough. You all have been through the divorce already. We’re not going to retry that divorce in this case.”

4. Defendant and Counterclaim Plaintiff objects to Definition No. 5 on the grounds that it is overly broad, unduly burdensome, and seeks documents not reasonably calculated to

lead to the discovery of admissible evidence regarding the claims and defenses in this case, taking into account the needs of the case, the amount in controversy, limitations on the parties' resources, and the importance of the discovery in resolving the issues at stake in the litigation to the extent it seeks documents beyond the scope of Va. Sup. Ct. R. 4:9(a). Defendant and Counterclaim Plaintiff will interpret the word "Document" in accordance with the definition included in Va. Sup. Ct. R. 4:9(a). Defendant and Counterclaim Plaintiff further objects to this Definition to the extent it seeks documents and information protected by the attorney-client privilege, and on the grounds that this Definition invades protected litigation work product and would require disclosure of core opinion work product and mental impression of counsel, which is prohibited by 4:1(b)(3) of the Rules of the Virginia Supreme Court. Plaintiff and Counterclaim Defendant has not made the requisite showing under the Rules.

5. Defendant and Counterclaim Plaintiff objects to Definition No. 7 on the grounds that it is overly broad, unduly burdensome, and seeks documents not reasonably calculated to lead to the discovery of admissible evidence regarding the claims and defenses in this case, taking into account the needs of the case, the amount in controversy, limitations on the parties' resources, and the importance of the discovery in resolving the issues at stake in the litigation, and because it seeks documents outside of Defendant and Counterclaim Plaintiff's possession, custody, or control. Defendant and Counterclaim Plaintiff further objects to this Definition to the extent it seeks documents and information protected by the attorney-client privilege, and on the grounds that this Definition invades protected litigation work product and would require disclosure of core opinion work product and mental impression of counsel, which is prohibited by 4:1(b)(3) of the Rules of the Virginia Supreme Court. Plaintiff and Counterclaim Defendant has not made the requisite showing under the Rules.

6. Defendant and Counterclaim Plaintiff objects to Definition No. 10 on the grounds that it is overly broad, unduly burdensome, and seeks documents not reasonably calculated to lead to the discovery of admissible evidence regarding the claims and defenses in this case, taking into account the needs of the case, the amount in controversy, limitations on the parties' resources, and the importance of the discovery in resolving the issues at stake in the litigation, including because on November 20, 2020, the Fairfax County Circuit Court ruled that discovery seeking documents "sufficient to reflect the impact" of the UK litigation "on Mr. Depp's reputation and career" was overly broad, unduly burdensome, and unreasonably vague, and therefore held that those Requests and this Request are beyond the scope of discovery in this case. And on December 18, 2020 the Fairfax County Circuit Court ruled that Request No. 23 of Mr. Depp's 2nd Requests for Document and Request 50 of Mr. Depp's 3rd Requests for Documents seeking all documents and communications between Ms. Heard and The Sun/NGN was overbroad, and therefore held that Request and this Request are beyond the scope of discovery in this case. The Court also ruled that Request No. 51 of Mr. Depp's 3rd Requests for Documents seeking all documents and communications relating to the UK Action was also overbroad. Additionally, Mr. Depp repeatedly took the position in his Opposition to Ms. Heard's Supplemental Plea in Bar that this Action and the U.K. Action did not arise from the same transaction or occurrence.

7. Defendant and Counterclaim Plaintiff objects to Definition No. 12 as vague, ambiguous, and failing to define with particularity the documents and information that it seeks, as it defines words in a circular, confusing, and non-specific manner, and is therefore overly broad and unduly burdensome.

8. Defendant and Counterclaim Plaintiff objects to Definition No. 13 as vague,

ambiguous, and failing to define with particularity the documents and information that it seeks, and is therefore overly broad and unduly burdensome, as it attempts to define non-specific words, terms, and phrases without providing any such definition.

OBJECTIONS TO INSTRUCTIONS

1. Defendant and Counterclaim Plaintiff objects to Instruction No. 1 to the extent it exceeds the requirements of Va. Sup. Ct. R. 4:9(a), which only requires the production of documents “which are in the possession, custody, or control of the party upon whom the request is served,” and is therefore overly broad, unduly burdensome, and seeks documents not reasonably calculated to lead to the discovery of admissible evidence regarding the claims and defenses in this case. Defendant and Counterclaim Plaintiff will produce documents in accordance with Va. Sup. Ct. R. 4:9(a). Defendant and Counterclaim Plaintiff further objects to this Instruction to the extent it seeks documents and information protected by the attorney-client privilege, and on the grounds that this Instruction invades protected litigation work product and would require disclosure of core opinion work product and mental impression of counsel, which is prohibited by 4:1(b)(3) of the Rules of the Virginia Supreme Court. Plaintiff and Counterclaim Defendant has not made the requisite showing under the Rules.

2. Defendant and Counterclaim Plaintiff objects to the portion of Instruction No. 3 seeking “The date such additional documents came into your possession shall be specified, as well as the identity of the individuals who furnished such additional documents to the person preparing the response” because it exceeds the requirements of Va. Sup. Ct. R 4:9 by requesting substantive information in a response to a Request for Production of Documents, and is therefore overly broad, unduly burdensome, and seeks documents not reasonably calculated to lead to the discovery of admissible evidence regarding the claims and defenses in this case.

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

4. Defendant and Counterclaim Plaintiff objects to Instruction Nos. 5(b) and (c) because the requests to identify each document in the manner requested and to “provide a description of the subject matter of each document or item” exceed the requirements of Va. Sup. Ct. Rs 4:9 and 4:1(b)(6) by requesting substantive information in a response to a Request for Production of Documents, and are therefore overly broad, unduly burdensome, and seek documents and information not reasonably calculated to lead to the discovery of admissible evidence regarding the claims and defenses in this case.

5. Defendant and Counterclaim Plaintiff objects to Instruction No. 6 as unduly burdensome because the Defendant and Counterclaim Plaintiff has an ongoing duty under Va. Sup. Ct. R. 4:1(e) to supplement document production and responses when and where necessary, and this instruction is therefore overly broad and unduly burdensome. Defendant and Counterclaim Plaintiff further objects to this Instruction because by its plain language of “no documents in existence” it seeks for Defendant and Counterclaim Plaintiff to respond regarding documents anywhere “in existence” that are outside of Defendant and Counterclaim Plaintiff’s possession, custody, or control.

6. Defendant and Counterclaim Plaintiff objects to Instruction No. 7 to the extent it

seeks documents and information protected by the attorney-client privilege, and on the grounds that this Request invades protected litigation work product and would require disclosure of core opinion work product and mental impression of counsel, which is prohibited by 4:1(b)(3) of the Rules of the Virginia Supreme Court.

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

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

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

Court.

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

11. Defendant and Counterclaim Plaintiff objects to Instruction No. 12 on the grounds that it exceeds the requirements of Va. Sup. Ct. R 4:9, and is therefore overly broad, unduly burdensome, and seeks documents and information not reasonably calculated to lead to the discovery of admissible evidence regarding the claims and defenses in this case. Defendant and Counterclaim Plaintiff will produce documents as they are kept in the usual course of business pursuant to Va. Sup. Ct. R. 4:9(b)(iii)(A). The Instruction is also ambiguous because it contradicts Instruction No. 9. Defendant and Counterclaim Plaintiff further objects to this instruction because a request to access, extract, inspect, and/or test Defendant and Counterclaim Plaintiff's devices raises significant issues of confidentiality and privacy, is subject to the balancing required by Va. Sup. Ct. R. 4:1(b)(1), and requires a heightened showing of relevance and discoverability that Plaintiff and Counterclaim Defendant has not demonstrated in this case. Such a request does not create a routine right of direct access to a party's electronic information and devices, as Courts guard against undue intrusiveness, undue burden, and significant overbreadth that results from the requested type of access, extraction, inspection, and/or testing. Additionally, Plaintiff and Counterclaim Defendant's UK Counsel confirmed on July 17, 2020 that Plaintiff and Counterclaim Defendant did not dispute the accuracy of the accompanying

date/time metadata to the May 2016 images, and further that any analysis of digital images will not yield any additional information than what can be seen from the images. For all of these reasons, Defendant and Counterclaim Plaintiff objects to this Instruction as overly broad, unduly burdensome, harassing, and seeking information not reasonably calculated to lead to the discovery of admissible evidence regarding the claims and defenses in this case, taking into account the needs of the case, the amount in controversy, limitations on the parties' resources, and the importance of the discovery in resolving the issues at stake in the litigation.

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

13. Defendant and Counterclaim Plaintiff objects to Instruction No. 15 because it seeks documents protected by the attorney-client privilege, and on the grounds that this Request invades protected litigation work product and would require disclosure of core opinion work product and mental impression of counsel, which is prohibited by 4:1(b)(3) of the Rules of the Virginia Supreme Court. Defendant and Counterclaim Plaintiff further objects to this Instruction seeking all documents in the possession of "any consultants or experts" because it exceeds the requirements of Va. Sup. Ct. R. 4:1(b)(4), and is therefore overly broad, unduly burdensome, and seeks documents not reasonably calculated to lead to the discovery of admissible evidence regarding the claims and defenses in this case.

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

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

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

REQUESTS FOR PRODUCTION

1. All Documents and Communications that refer, reflect, or relate to the “first violent incident” described in Your Witness Statement at paragraphs 44-51.

OBJECTION: Defendant and Counterclaim Plaintiff objects to the phrase “relate to” of this Request on the grounds that it is vague, ambiguous, and fails to define with particularity the information that it seeks, is overly broad, unduly burdensome, and seeks information not reasonably calculated to lead to the discovery of admissible evidence regarding the claims and defenses in this case, taking into account the needs of the case, the amount in controversy, limitations on the parties’ resources, and the importance of the discovery in resolving the issues at stake in this litigation. Defendant and Counterclaim Plaintiff further objects to this Request as it seeks documents that have already been produced. Defendant and Counterclaim Plaintiff further objects to this Request because it seeks information protected by the attorney-client privilege, and on the grounds that this Request invades protected litigation work product and would require disclosure of core opinion work product and mental impression of counsel, which is prohibited by 4:1(b)(3) of the Rules of the Virginia Supreme Court. Plaintiff and Counterclaim Defendant has not made the requisite showing under the Rules.

RESPONSE: Subject to and without waiving the objections, Defendant and Counterclaim Plaintiff has produced or will produce non-privileged and non-work product documents in her possession, custody, and control that refer to or reflect the paragraphs of Defendant and Counterclaim Plaintiff's Witness Statement referred to in this Request, if any.

2. All Documents and Communications that refer, reflect, or relate to the "Painting incident, March 2013" described in Your Witness Statement at paragraphs 52-64.

OBJECTION: Defendant and Counterclaim Plaintiff objects to the phrase "relate to" of this Request on the grounds that it is vague, ambiguous, and fails to define with particularity the information that it seeks, is overly broad, unduly burdensome, and seeks information not reasonably calculated to lead to the discovery of admissible evidence regarding the claims and defenses in this case, taking into account the needs of the case, the amount in controversy, limitations on the parties' resources, and the importance of the discovery in resolving the issues at stake in this litigation. Defendant and Counterclaim Plaintiff further objects to this Request as it seeks documents that have already been produced. Defendant and Counterclaim Plaintiff further objects to this Request because it seeks information protected by the attorney-client privilege, and on the grounds that this Request invades protected litigation work product and would require disclosure of core opinion work product and mental impression of counsel, which is prohibited by 4:1(b)(3) of the Rules of the Virginia Supreme Court. Plaintiff and Counterclaim Defendant has not made the requisite showing under the Rules.

RESPONSE: Subject to and without waiving the objections, Defendant and Counterclaim Plaintiff has produced or will produce non-privileged and non-work product documents in her possession, custody, and control that refer to or reflect the paragraphs of Defendant and Counterclaim Plaintiff's Witness Statement referred to in this Request, if any.

3. All Documents and Communications that mention, refer, or relate in any way to Mr. Depp on March 8, 2013 (i.e., the date of the “Painting incident, March 2013,” referenced in Your Witness Statement at paragraphs 52-64).

OBJECTION: Defendant and Counterclaim Plaintiff objects to the phrase “relate in any way to” of this Request on the grounds that it is vague, ambiguous, and fails to define with particularity the information that it seeks, is overly broad, unduly burdensome, and seeks information not reasonably calculated to lead to the discovery of admissible evidence regarding the claims and defenses in this case, taking into account the needs of the case, the amount in controversy, limitations on the parties’ resources, and the importance of the discovery in resolving the issues at stake in this litigation. Defendant and Counterclaim Plaintiff further objects to this Request as it seeks documents that have already been produced. Defendant and Counterclaim Plaintiff further objects to this Request as duplicative of Request for Production 2. Defendant and Counterclaim Plaintiff further objects to this Request because it seeks information protected by the attorney-client privilege, and on the grounds that this Request invades protected litigation work product and would require disclosure of core opinion work product and mental impression of counsel, which is prohibited by 4:1(b)(3) of the Rules of the Virginia Supreme Court. Plaintiff and Counterclaim Defendant has not made the requisite showing under the Rules.

RESPONSE: Subject to and without waiving the objections, Defendant and Counterclaim Plaintiff has produced or will produce non-privileged and non-work product documents in her possession, custody, and control that mention or refer to the Painting incident, March 2013, if any.

4. All Communications concerning Your relationship with Mr. Depp, from and after January 1, 2014, between or among You, on the one hand, and any of the following Persons on the other hand: Whitney Henriquez, Raquel Pennington, Kristina Sexton, Amanda de

Cadenet, iO Tillett Wright, Joshua Drew, Paige Heard, and/or David Heard.

OBJECTION: Defendant and Counterclaim Plaintiff objects to this Request, including the phrase “relate to,” on the grounds that it is vague, ambiguous, and fails to define with particularity the information that it seeks, is overly broad, unduly burdensome, harassing, and seeks information not reasonably calculated to lead to the discovery of admissible evidence regarding the claims and defenses in this case, taking into account the needs of the case, the amount in controversy, limitations on the parties’ resources, and the importance of the discovery in resolving the issues at stake in this litigation. Defendant and Counterclaim Plaintiff further objects to this Request as it seeks documents that have already been produced. Defendant and Counterclaim Plaintiff objects to this Request on the grounds that it is obtainable from other sources that are more convenient, less burdensome, and less expensive.

This Request is also overbroad and unduly burdensome to the point of harassment, is not calculated to lead to the discovery of information relevant to the subject matter of this action, and seeks information related to matters beyond the scope of the asserted claims and defenses in this suit because on December 18, 2020, the Fairfax County Circuit Court ruled that Request 43 of Mr. Depp’s 3rd Requests for Documents seeking all communications between Ms. Heard and anyone relating to her relationship with Mr. Depp, claims of abuse or violence involving Mr. Depp, and injuries Ms. Heard contends she suffered as a result of Mr. Depp’s conduct was overbroad, and therefore held that Request and this Request are beyond the scope of discovery in this case. The Fairfax County Circuit Court also ruled that Request 52 of Mr. Depp’s 3rd Requests for Documents seeking all documents and communications relating to Ms. Heard’s “relationship with Mr. Depp” was also overbroad, and therefore held that Request and this Request are beyond the scope of discovery in this case. These Orders should apply the same to

these Requests for Production to Defendant and Counterclaim Plaintiff.

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

RESPONSE: Subject to and without waiving the objections, and notwithstanding that Defendant and Counterclaim Plaintiff has produced documents potentially responsive to this overbroad and unduly burdensome Request, Defendant and Counterclaim Plaintiff stands on her objections to this Request.

5. All Documents and Communications that refer, reflect, or relate to the “Boston-LA flight, 24 May 2014” referenced in Your Witness Statement at paragraphs 65-83.

OBJECTION: Defendant and Counterclaim Plaintiff objects to the phrase “relate to” of this Request on the grounds that it is vague, ambiguous, and fails to define with particularity the information that it seeks, is overly broad, unduly burdensome, and seeks information not reasonably calculated to lead to the discovery of admissible evidence regarding the claims and defenses in this case, taking into account the needs of the case, the amount in controversy, limitations on the parties’ resources, and the importance of the discovery in resolving the issues at stake in this litigation. Defendant and Counterclaim Plaintiff further objects to this Request as it seeks documents that have already been produced. Defendant and Counterclaim Plaintiff further objects to this Request because it seeks information protected by the attorney-client privilege, and on the grounds that this Request invades protected litigation work product and would require disclosure of core opinion work product and mental impression of counsel, which

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

RESPONSE: Subject to and without waiving the objections, Defendant and Counterclaim Plaintiff has produced or will produce non-privileged and non-work product documents in her possession, custody, and control that refer to or reflect the paragraphs of Defendant and Counterclaim Plaintiff's Witness Statement referred to in this Request, if any.

6. All Documents and Communications that mention, refer, or relate in any way to Mr. Depp on May 24, 2014 (i.e., the date of "Boston-LA flight" referenced in Your Witness Statement at paragraphs 65-83).

OBJECTION: Defendant and Counterclaim Plaintiff objects to the phrase "relate in any way to" of this Request on the grounds that it is vague, ambiguous, and fails to define with particularity the information that it seeks, is overly broad, unduly burdensome, and seeks information not reasonably calculated to lead to the discovery of admissible evidence regarding the claims and defenses in this case, taking into account the needs of the case, the amount in controversy, limitations on the parties' resources, and the importance of the discovery in resolving the issues at stake in this litigation. Defendant and Counterclaim Plaintiff further objects to this Request as it seeks documents that have already been produced. Defendant and Counterclaim Plaintiff further objects to this Request as duplicative of Request for Production 5. Defendant and Counterclaim Plaintiff further objects to this Request because it seeks information protected by the attorney-client privilege, and on the grounds that this Request invades protected litigation work product and would require disclosure of core opinion work product and mental impression of counsel, which is prohibited by 4:1(b)(3) of the Rules of the Virginia Supreme Court. Plaintiff and Counterclaim Defendant has not made the requisite showing under the Rules.

RESPONSE: Subject to and without waiving the objections, Defendant and Counterclaim Plaintiff has produced or will produce non-privileged and non-work product documents in her possession, custody, and control that mention or refer to the Boston-LA flight, 24 May 2014, if any.

7. All Documents and Communications that refer, reflect, or relate to the alleged incident in the “Bahamas, August 2014” referenced in Your Witness Statement at paragraphs 84-92.

OBJECTION: Defendant and Counterclaim Plaintiff objects to the phrase “relate to” of this Request on the grounds that it is vague, ambiguous, and fails to define with particularity the information that it seeks, is overly broad, unduly burdensome, and seeks information not reasonably calculated to lead to the discovery of admissible evidence regarding the claims and defenses in this case, taking into account the needs of the case, the amount in controversy, limitations on the parties’ resources, and the importance of the discovery in resolving the issues at stake in this litigation. Defendant and Counterclaim Plaintiff further objects to this Request as it seeks documents that have already been produced. Defendant and Counterclaim Plaintiff further objects to this Request because it seeks information protected by the attorney-client privilege, and on the grounds that this Request invades protected litigation work product and would require disclosure of core opinion work product and mental impression of counsel, which is prohibited by 4:1(b)(3) of the Rules of the Virginia Supreme Court. Plaintiff and Counterclaim Defendant has not made the requisite showing under the Rules.

RESPONSE: Subject to and without waiving the objections, Defendant and Counterclaim Plaintiff has produced or will produce non-privileged and non-work product documents in her possession, custody, and control that refer to or reflect the paragraphs of Defendant and Counterclaim Plaintiff’s Witness Statement referred to in this Request, if any.

8. All Communications between You and Debbie Lloyd during Your stay in the “Bahamas, August 2014” referenced in Your Witness Statement at paragraphs 84-92.

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

RESPONSE: Subject to and without waiving the objections, Defendant and Counterclaim Plaintiff has produced or will produce non-privileged and non-work product documents in her possession, custody, and control responsive to this Request, if any.

9. All Documents and Communications that mention, refer, or relate in any way to Mr. Depp during Your stay in the “Bahamas, August 2014” referenced in Your Witness Statement at paragraphs 84-92.

OBJECTION: Defendant and Counterclaim Plaintiff objects to the phrase “relate in any way to” of this Request on the grounds that it is vague, ambiguous, and fails to define with particularity the information that it seeks, is overly broad, unduly burdensome, and seeks information not reasonably calculated to lead to the discovery of admissible evidence regarding the claims and defenses in this case, taking into account the needs of the case, the amount in controversy, limitations on the parties’ resources, and the importance of the discovery in resolving the issues at stake in this litigation. Defendant and Counterclaim Plaintiff further objects to this Request as it seeks documents that have already been produced. Defendant and Counterclaim Plaintiff further objects to this Request as duplicative of Request for Production 8. Defendant and Counterclaim Plaintiff further objects to this Request because it seeks information

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

RESPONSE: Subject to and without waiving the objections, Defendant and Counterclaim Plaintiff has produced or will produce non-privileged and non-work product documents in her possession, custody, and control that mention or refer to Mr. Depp during Defendant and Counterclaim Plaintiff's stay in the Bahamas in August 2014, if any.

10. All Documents and Communications that refer, reflect, or relate to the alleged incident in "Tokyo, January 2015" referenced in Your Witness Statement at paragraphs 94-96.

OBJECTION: Defendant and Counterclaim Plaintiff objects to the phrase "relate to" of this Request on the grounds that it is vague, ambiguous, and fails to define with particularity the information that it seeks, is overly broad, unduly burdensome, and seeks information not reasonably calculated to lead to the discovery of admissible evidence regarding the claims and defenses in this case, taking into account the needs of the case, the amount in controversy, limitations on the parties' resources, and the importance of the discovery in resolving the issues at stake in this litigation. Defendant and Counterclaim Plaintiff further objects to this Request as it seeks documents that have already been produced. Defendant and Counterclaim Plaintiff further objects to this Request because it seeks information protected by the attorney-client privilege, and on the grounds that this Request invades protected litigation work product and would require disclosure of core opinion work product and mental impression of counsel, which is prohibited by 4:1(b)(3) of the Rules of the Virginia Supreme Court. Plaintiff and Counterclaim Defendant has not made the requisite showing under the Rules.

RESPONSE: Subject to and without waiving the objections, Defendant and Counterclaim Plaintiff has produced or will produce non-privileged and non-work product documents in her possession, custody, and control that refer to or reflect the paragraphs of Defendant and Counterclaim Plaintiff's Witness Statement referred to in this Request, if any.

11. All Documents and Communications that mention, refer, or relate in any way to Mr. Depp during Your stay in Tokyo referenced in Your Witness Statement at paragraphs 94-96.

OBJECTION: Defendant and Counterclaim Plaintiff objects to the phrase "relate in any way to" of this Request on the grounds that it is vague, ambiguous, and fails to define with particularity the information that it seeks, is overly broad, unduly burdensome, and seeks information not reasonably calculated to lead to the discovery of admissible evidence regarding the claims and defenses in this case, taking into account the needs of the case, the amount in controversy, limitations on the parties' resources, and the importance of the discovery in resolving the issues at stake in this litigation. Defendant and Counterclaim Plaintiff further objects to this Request as it seeks documents that have already been produced. Defendant and Counterclaim Plaintiff further objects to this Request as duplicative of Request for Production 10. Defendant and Counterclaim Plaintiff further objects to this Request because it seeks information protected by the attorney-client privilege, and on the grounds that this Request invades protected litigation work product and would require disclosure of core opinion work product and mental impression of counsel, which is prohibited by 4:1(b)(3) of the Rules of the Virginia Supreme Court. Plaintiff and Counterclaim Defendant has not made the requisite showing under the Rules.

RESPONSE: Subject to and without waiving the objections, Defendant and Counterclaim Plaintiff has produced or will produce non-privileged and non-work product

documents in her possession, custody, and control that mention or refer to the incident in Tokyo in January 2015, if any.

12. All Communications between or among You, Whitney Henriquez, iO Tillett Wright, Amanda de Cadenet, Kristina Sexton, Joshua Drew, Paige Heard, or David Heard regarding Your engagement or wedding to Mr. Depp.

OBJECTION: Defendant and Counterclaim Plaintiff objects to this Request, including the phrase “Your engagement or wedding to Mr. Depp, on the grounds that it is vague, ambiguous, and fails to define with particularity the information that it seeks, is overly broad, unduly burdensome, and seeks information not reasonably calculated to lead to the discovery of admissible evidence regarding the claims and defenses in this case, taking into account the needs of the case, the amount in controversy, limitations on the parties’ resources, and the importance of the discovery in resolving the issues at stake in this litigation. Defendant and Counterclaim Plaintiff further objects to this Request as it seeks documents that have already been produced. Defendant and Counterclaim Plaintiff further objects to this Request because it seeks information protected by the attorney-client privilege, and on the grounds that this Request invades protected litigation work product and would require disclosure of core opinion work product and mental impression of counsel, which is prohibited by 4:1(b)(3) of the Rules of the Virginia Supreme Court. Plaintiff and Counterclaim Defendant has not made the requisite showing under the Rules.

RESPONSE: Subject to and without waiving the objections, and notwithstanding that Defendant and Counterclaim Plaintiff has produced documents potentially responsive to this overbroad and unduly burdensome Request, Defendant and Counterclaim Plaintiff stands on her objections to this Request.

13. All Documents and Communications that refer, reflect, or relate to the alleged incident at the “Wedding” referenced in Your Witness Statement at paragraphs 97-98.

OBJECTION: Defendant and Counterclaim Plaintiff objects to the phrase “relate to” of this Request on the grounds that it is vague, ambiguous, and fails to define with particularity the information that it seeks, is overly broad, unduly burdensome, and seeks information not reasonably calculated to lead to the discovery of admissible evidence regarding the claims and defenses in this case, taking into account the needs of the case, the amount in controversy, limitations on the parties’ resources, and the importance of the discovery in resolving the issues at stake in this litigation. Defendant and Counterclaim Plaintiff further objects to this Request as it seeks documents that have already been produced. Defendant and Counterclaim Plaintiff further objects to this Request because it seeks information protected by the attorney-client privilege, and on the grounds that this Request invades protected litigation work product and would require disclosure of core opinion work product and mental impression of counsel, which is prohibited by 4:1(b)(3) of the Rules of the Virginia Supreme Court. Plaintiff and Counterclaim Defendant has not made the requisite showing under the Rules.

RESPONSE: Subject to and without waiving the objections, Defendant and Counterclaim Plaintiff has produced or will produce non-privileged and non-work product documents in her possession, custody, and control that refer to or reflect the paragraphs of Defendant and Counterclaim Plaintiff’s Witness Statement referred to in this Request, if any.

14. All Documents and Communications that refer, reflect, or relate to the alleged incident in “Australia, March 2015” referenced in Your Witness Statement at paragraphs 99-130.

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

defenses in this case, taking into account the needs of the case, the amount in controversy, limitations on the parties' resources, and the importance of the discovery in resolving the issues at stake in this litigation. Defendant and Counterclaim Plaintiff further objects to this Request as it seeks documents that have already been produced. Defendant and Counterclaim Plaintiff further objects to this Request because it seeks information protected by the attorney-client privilege, and on the grounds that this Request invades protected litigation work product and would require disclosure of core opinion work product and mental impression of counsel, which is prohibited by 4:1(b)(3) of the Rules of the Virginia Supreme Court. Plaintiff and Counterclaim Defendant has not made the requisite showing under the Rules.

RESPONSE: Subject to and without waiving the objections, Defendant and Counterclaim Plaintiff has produced or will produce non-privileged and non-work product documents in her possession, custody, and control that refer to or reflect the paragraphs of Defendant and Counterclaim Plaintiff's Witness Statement referred to in this Request, if any.

15. All Documents and Communications that mention, refer, or relate in any way to Mr. Depp during Your stay in Australia referenced in Your Witness Statement at paragraphs 99-130.

OBJECTION: Defendant and Counterclaim Plaintiff objects to the phrase "relate in any way to" of this Request on the grounds that it is vague, ambiguous, and fails to define with particularity the information that it seeks, is overly broad, unduly burdensome, and seeks information not reasonably calculated to lead to the discovery of admissible evidence regarding the claims and defenses in this case, taking into account the needs of the case, the amount in controversy, limitations on the parties' resources, and the importance of the discovery in resolving the issues at stake in this litigation. Defendant and Counterclaim Plaintiff further objects to this Request as it seeks documents that have already been produced. Defendant and

Counterclaim Plaintiff further objects to this Request as duplicative of Request for Production

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

RESPONSE: Subject to and without waiving the objections, Defendant and Counterclaim Plaintiff has produced or will produce non-privileged and non-work product documents in her possession, custody, and control that mention or refer to the incident in Australia in March 2015, if any.

16. All Documents and Communications that mention, refer, or relate in any way to Mr. Depp within ten days after You returned from Your stay in Australia referenced in Your Witness Statement at paragraphs 99-130.

OBJECTION: Defendant and Counterclaim Plaintiff objects to this Request, including the phrase “relate in any way to” and the time period stated in this Request, on the grounds that they are vague, ambiguous, and fail to define with particularity the information that they seek, are overly broad, unduly burdensome, and seek information not reasonably calculated to lead to the discovery of admissible evidence regarding the claims and defenses in this case, taking into account the needs of the case, the amount in controversy, limitations on the parties’ resources, and the importance of the discovery in resolving the issues at stake in this litigation. Defendant and Counterclaim Plaintiff further objects to this Request as it seeks documents that have already been produced. Defendant and Counterclaim Plaintiff further objects to this Request because it seeks information protected by the attorney-client privilege, and on the grounds that this Request

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

RESPONSE: Subject to and without waiving the objections, and notwithstanding that Defendant and Counterclaim Plaintiff has produced documents potentially responsive to this overbroad and unduly burdensome Request, Defendant and Counterclaim Plaintiff stands on her objections to this Request.

17. All photographs taken on any of Your devices during Your stay in Australia referenced in Your Witness Statement at paragraphs 99-130.

OBJECTION: Defendant and Counterclaim Plaintiff objects to the undefined word “devices” in this Request as vague, ambiguous, and failing to define with particularity the information that it seeks. Defendant and Counterclaim Plaintiff objects to this Request, on the grounds that is overly broad, unduly burdensome, and seeks information not reasonably calculated to lead to the discovery of admissible evidence regarding the claims and defenses in this case, taking into account the needs of the case, the amount in controversy, limitations on the parties’ resources, and the importance of the discovery in resolving the issues at stake in this litigation, in that it seeks all photographs no matter the subject matter. Defendant and Counterclaim Plaintiff further objects to this Request as it seeks documents that have already been produced.

RESPONSE: Subject to and without waiving the objections, Defendant and Counterclaim Plaintiff has produced or will produce any photographs in her possession, custody, and control of the incidents in Australia between March 3-5, 2015, if any.

18. All Documents and Communications that refer, reflect, or relate to the “Staircase

incident, March 2015,” referenced in Your Witness Statement at paragraphs 131-134.

OBJECTION: Defendant and Counterclaim Plaintiff objects to the phrase “relate to” of this Request on the grounds that it is vague, ambiguous, and fails to define with particularity the information that it seeks, is overly broad, unduly burdensome, and seeks information not reasonably calculated to lead to the discovery of admissible evidence regarding the claims and defenses in this case, taking into account the needs of the case, the amount in controversy, limitations on the parties’ resources, and the importance of the discovery in resolving the issues at stake in this litigation. Defendant and Counterclaim Plaintiff further objects to this Request as it seeks documents that have already been produced. Defendant and Counterclaim Plaintiff further objects to this Request because it seeks information protected by the attorney-client privilege, and on the grounds that this Request invades protected litigation work product and would require disclosure of core opinion work product and mental impression of counsel, which is prohibited by 4:1(b)(3) of the Rules of the Virginia Supreme Court. Plaintiff and Counterclaim Defendant has not made the requisite showing under the Rules.

RESPONSE: Subject to and without waiving the objections, Defendant and Counterclaim Plaintiff has produced or will produce non-privileged and non-work product documents in her possession, custody, and control that refer to or reflect the paragraphs of Defendant and Counterclaim Plaintiff’s Witness Statement referred to in this Request, if any.

19. All Communications between You and Whitney Henriquez on the date of the “Staircase incident” referenced in Your Witness Statement at paragraphs 131-134.

OBJECTION: Defendant and Counterclaim Plaintiff objects to this Request having no limitations on subject matter and on the grounds that it is vague, ambiguous, and fails to define with particularity the information that it seeks, is overly broad, unduly burdensome, harassing, and seeks information not reasonably calculated to lead to the discovery of admissible evidence

regarding the claims and defenses in this case, taking into account the needs of the case, the amount in controversy, limitations on the parties' resources, and the importance of the discovery in resolving the issues at stake in this litigation. Defendant and Counterclaim Plaintiff further objects to this Request as it seeks documents that have already been produced. Defendant and Counterclaim Plaintiff further objects to this Request as duplicative of Request for Production 18.

RESPONSE: Subject to and without waiving the objections, Defendant and Counterclaim Plaintiff has produced or will produce non-privileged and non-work product documents in her possession, custody, and control that refer to or reflect the "Staircase Incident" referenced in this Request, if any.

20. All Documents and Communications that mention, refer, or relate in any way to Mr. Depp on the date of the "Staircase incident" referenced in Your witness Statement at paragraphs 131-134.

OBJECTION: Defendant and Counterclaim Plaintiff objects to the phrase "relate in any way to" of this Request on the grounds that it is vague, ambiguous, and fails to define with particularity the information that it seeks, is overly broad, unduly burdensome, and seeks information not reasonably calculated to lead to the discovery of admissible evidence regarding the claims and defenses in this case, taking into account the needs of the case, the amount in controversy, limitations on the parties' resources, and the importance of the discovery in resolving the issues at stake in this litigation. Defendant and Counterclaim Plaintiff further objects to this Request as it seeks documents that have already been produced. Defendant and Counterclaim Plaintiff further objects to this Request as duplicative of Request for Production 18. Defendant and Counterclaim Plaintiff further objects to this Request because it seeks information protected by the attorney-client privilege, and on the grounds that this Request

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

RESPONSE: Subject to and without waiving the objections, Defendant and Counterclaim Plaintiff has produced or will produce non-privileged and non-work product documents in her possession, custody, and control that mention or refer to the Staircase Incident, if any.

21. All Documents and Communications that mention, refer, or relate in any way to Mr. Depp within ten days after the date of the “Staircase incident” referenced in Your witness Statement at paragraphs 131-134.

OBJECTION: Defendant and Counterclaim Plaintiff objects to this Request, including the phrase “relate in any way to” and the time period stated in this Request, on the grounds that they are vague, ambiguous, and fail to define with particularity the information that they seek, are overly broad, unduly burdensome, and seek information not reasonably calculated to lead to the discovery of admissible evidence regarding the claims and defenses in this case, taking into account the needs of the case, the amount in controversy, limitations on the parties’ resources, and the importance of the discovery in resolving the issues at stake in this litigation. Defendant and Counterclaim Plaintiff further objects to this Request as it seeks documents that have already been produced. Defendant and Counterclaim Plaintiff further objects to this Request because it seeks information protected by the attorney-client privilege, and on the grounds that this Request invades protected litigation work product and would require disclosure of core opinion work product and mental impression of counsel, which is prohibited by 4:1(b)(3) of the Rules of the Virginia Supreme Court. Plaintiff and Counterclaim Defendant has not made the requisite

showing under the Rules.

RESPONSE: Subject to and without waiving the objections, and notwithstanding that Defendant and Counterclaim Plaintiff has produced documents potentially responsive to this overbroad and unduly burdensome Request, Defendant and Counterclaim Plaintiff stands on her objections to this Request.

22. All Documents and Communications that refer, reflect, or relate to the incident on the “Malaysia train, August 2015” referenced in Your Witness Statement at paragraph 135.

OBJECTION: Defendant and Counterclaim Plaintiff objects to the phrase “relate to” of this Request on the grounds that it is vague, ambiguous, and fails to define with particularity the information that it seeks, is overly broad, unduly burdensome, and seeks information not reasonably calculated to lead to the discovery of admissible evidence regarding the claims and defenses in this case, taking into account the needs of the case, the amount in controversy, limitations on the parties’ resources, and the importance of the discovery in resolving the issues at stake in this litigation. Defendant and Counterclaim Plaintiff further objects to this Request as it seeks documents that have already been produced. Defendant and Counterclaim Plaintiff further objects to this Request because it seeks information protected by the attorney-client privilege, and on the grounds that this Request invades protected litigation work product and would require disclosure of core opinion work product and mental impression of counsel, which is prohibited by 4:1(b)(3) of the Rules of the Virginia Supreme Court. Plaintiff and Counterclaim Defendant has not made the requisite showing under the Rules.

RESPONSE: Subject to and without waiving the objections, Defendant and Counterclaim Plaintiff has produced or will produce non-privileged and non-work product documents in her possession, custody, and control that refer to or reflect the paragraphs of

Defendant and Counterclaim Plaintiff's Witness Statement referred to in this Request, if any.

23. All Documents and Communications that mention, refer, or relate in any way to Mr. Depp within on the date of the alleged incident on the "Malaysia train, August 2015" referenced in Your witness Statement at paragraph 135.

OBJECTION: Defendant and Counterclaim Plaintiff objects to the phrase "relate in any way to" of this Request on the grounds that it is vague, ambiguous, and fails to define with particularity the information that it seeks, is overly broad, unduly burdensome, and seeks information not reasonably calculated to lead to the discovery of admissible evidence regarding the claims and defenses in this case, taking into account the needs of the case, the amount in controversy, limitations on the parties' resources, and the importance of the discovery in resolving the issues at stake in this litigation. Defendant and Counterclaim Plaintiff further objects to this Request as it seeks documents that have already been produced. Defendant and Counterclaim Plaintiff further objects to this Request as duplicative of Request for Production 22. Defendant and Counterclaim Plaintiff further objects to this Request because it seeks information protected by the attorney-client privilege, and on the grounds that this Request invades protected litigation work product and would require disclosure of core opinion work product and mental impression of counsel, which is prohibited by 4:1(b)(3) of the Rules of the Virginia Supreme Court. Plaintiff and Counterclaim Defendant has not made the requisite showing under the Rules.

RESPONSE: Subject to and without waiving the objections, Defendant and Counterclaim Plaintiff has produced or will produce non-privileged and non-work product documents in her possession, custody, and control that mention or refer to the Malaysia train Incident, if any.

24. All Documents and Communications that refer, reflect, or relate to the alleged incident in "Los Angeles, November 2015" referenced in Your Witness Statement at

paragraph 136.

OBJECTION: Defendant and Counterclaim Plaintiff objects to the phrase “relate to” of this Request on the grounds that it is vague, ambiguous, and fails to define with particularity the information that it seeks, is overly broad, unduly burdensome, and seeks information not reasonably calculated to lead to the discovery of admissible evidence regarding the claims and defenses in this case, taking into account the needs of the case, the amount in controversy, limitations on the parties’ resources, and the importance of the discovery in resolving the issues at stake in this litigation. Defendant and Counterclaim Plaintiff further objects to this Request as it seeks documents that have already been produced. Defendant and Counterclaim Plaintiff further objects to this Request because it seeks information protected by the attorney-client privilege, and on the grounds that this Request invades protected litigation work product and would require disclosure of core opinion work product and mental impression of counsel, which is prohibited by 4:1(b)(3) of the Rules of the Virginia Supreme Court. Plaintiff and Counterclaim Defendant has not made the requisite showing under the Rules.

RESPONSE: Subject to and without waiving the objections, Defendant and Counterclaim Plaintiff has produced or will produce non-privileged and non-work product documents in her possession, custody, and control that refer to or reflect the paragraphs of Defendant and Counterclaim Plaintiff’s Witness Statement referred to in this Request, if any.

25. All Documents and Communications that mention, refer, or relate in any way to Mr. Depp within ten days after the date of the alleged incident in “Los Angeles, November 2015” referenced in Your Witness Statement at paragraph 136.

OBJECTION: Defendant and Counterclaim Plaintiff objects to this Request, including the phrase “relate in any way to” and the time period stated in this Request, on the grounds that they are vague, ambiguous, and fail to define with particularity the information that they seek,

are overly broad, unduly burdensome, and seek information not reasonably calculated to lead to the discovery of admissible evidence regarding the claims and defenses in this case, taking into account the needs of the case, the amount in controversy, limitations on the parties' resources, and the importance of the discovery in resolving the issues at stake in this litigation. Defendant and Counterclaim Plaintiff further objects to this Request as it seeks documents that have already been produced. Defendant and Counterclaim Plaintiff further objects to this Request because it seeks information protected by the attorney-client privilege, and on the grounds that this Request invades protected litigation work product and would require disclosure of core opinion work product and mental impression of counsel, which is prohibited by 4:1(b)(3) of the Rules of the Virginia Supreme Court. Plaintiff and Counterclaim Defendant has not made the requisite showing under the Rules.

RESPONSE: Subject to and without waiving the objections, and notwithstanding that Defendant and Counterclaim Plaintiff has produced documents potentially responsive to this overbroad and unduly burdensome Request, Defendant and Counterclaim Plaintiff stands on her objections to this Request.

26. All Documents and Communications that refer, reflect, or relate to the alleged incident “on the night of 15 December 2015” referenced in Your Witness Statement at paragraphs 137-147.

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

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

RESPONSE: Subject to and without waiving the objections, Defendant and Counterclaim Plaintiff has produced or will produce non-privileged and non-work product documents in her possession, custody, and control that refer to or reflect the paragraphs of Defendant and Counterclaim Plaintiff's Witness Statement referred to in this Request, if any.

27. All Documents and Communications that mention, refer, or relate in any way to Mr. Depp on the date of the alleged incident on December 15, 2015 referenced in Your Witness Statement at paragraphs 137-147.

OBJECTION: Defendant and Counterclaim Plaintiff objects to the phrase "relate in any way to" of this Request on the grounds that it is vague, ambiguous, and fails to define with particularity the information that it seeks, is overly broad, unduly burdensome, and seeks information not reasonably calculated to lead to the discovery of admissible evidence regarding the claims and defenses in this case, taking into account the needs of the case, the amount in controversy, limitations on the parties' resources, and the importance of the discovery in resolving the issues at stake in this litigation. Defendant and Counterclaim Plaintiff further objects to this Request as it seeks documents that have already been produced. Defendant and Counterclaim Plaintiff further objects to this Request as duplicative of Request for Production 26. Defendant and Counterclaim Plaintiff further objects to this Request because it seeks

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

RESPONSE: Subject to and without waiving the objections, Defendant and Counterclaim Plaintiff has produced or will produce non-privileged and non-work product documents in her possession, custody, and control that mention or refer to the incident on December 15, 2015, if any.

28. All Documents and Communications that mention, refer, or relate in any way to Mr. Depp within ten days after the date of the alleged incident on December 15, 2015 referenced in Your Witness Statement at paragraphs 137-147.

OBJECTION: Defendant and Counterclaim Plaintiff objects to this Request, including the phrase “relate in any way to” and the time period stated in this Request, on the grounds that they are vague, ambiguous, and fail to define with particularity the information that they seek, are overly broad, unduly burdensome, and seek information not reasonably calculated to lead to the discovery of admissible evidence regarding the claims and defenses in this case, taking into account the needs of the case, the amount in controversy, limitations on the parties’ resources, and the importance of the discovery in resolving the issues at stake in this litigation. Defendant and Counterclaim Plaintiff further objects to this Request as it seeks documents that have already been produced. Defendant and Counterclaim Plaintiff further objects to this Request because it seeks information protected by the attorney-client privilege, and on the grounds that this Request invades protected litigation work product and would require disclosure of core opinion work product and mental impression of counsel, which is prohibited by 4:1(b)(3) of the Rules of the

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

RESPONSE: Subject to and without waiving the objections, and notwithstanding that Defendant and Counterclaim Plaintiff has produced documents potentially responsive to this overbroad and unduly burdensome Request, Defendant and Counterclaim Plaintiff stands on her objections to this Request.

29. All Documents and Communications that refer, reflect, or relate to Your appearance on the “Late Late Show” hosted by James Corden on or about December 16, 2015.

OBJECTION: Defendant and Counterclaim Plaintiff objects to this Request, including the phrase “relate to,” on the grounds that it is vague, ambiguous, and fails to define with particularity the information that it seeks, is overly broad, unduly burdensome, harassing, and seeks information not reasonably calculated to lead to the discovery of admissible evidence regarding the claims and defenses in this case, taking into account the needs of the case, the amount in controversy, limitations on the parties’ resources, and the importance of the discovery in resolving the issues at stake in this litigation. For the same reasons, Defendant and Counterclaim Plaintiff objects to this Request as it is not bound by subject matter in any manner whatsoever. Defendant and Counterclaim Plaintiff further objects to this Request as it seeks documents that have already been produced.

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

RESPONSE: Subject to and without waiving the objections, and notwithstanding that Defendant and Counterclaim Plaintiff has produced documents potentially responsive to this overbroad and unduly burdensome Request, Defendant and Counterclaim Plaintiff stands on her objections to this Request.

30. All photographs taken on any of Your devices on December 15, 2015.

OBJECTION: Defendant and Counterclaim Plaintiff objects to the undefined word “devices” in this Request as vague, ambiguous, and failing to define with particularity the information that it seeks. Defendant and Counterclaim Plaintiff objects to this Request, on the grounds that is overly broad, unduly burdensome, and seeks information not reasonably calculated to lead to the discovery of admissible evidence regarding the claims and defenses in this case, taking into account the needs of the case, the amount in controversy, limitations on the parties’ resources, and the importance of the discovery in resolving the issues at stake in this litigation, in that it seeks all photographs no matter the subject matter. Defendant and Counterclaim Plaintiff further objects to this Request as it seeks documents that have already been produced.

RESPONSE: Subject to and without waiving the objections, Defendant and Counterclaim Plaintiff has produced or will produce any photographs in her possession, custody, and control of the incident on December 15, 2015, if any.

31. All Communications between You, Raquel Pennington, iO Tillett Wright and/or Melanie Inglessis on December 15, 2015; December 16, 2015; and December 17, 2015.

OBJECTION: Defendant and Counterclaim Plaintiff objects to this Request having no limitations on subject matter and on the grounds that it is vague, ambiguous, and fails to define with particularity the information that it seeks, is overly broad, unduly burdensome, harassing, and seeks information not reasonably calculated to lead to the discovery of admissible evidence

regarding the claims and defenses in this case, taking into account the needs of the case, the amount in controversy, limitations on the parties' resources, and the importance of the discovery in resolving the issues at stake in this litigation.

Defendant and Counterclaim Plaintiff further objects to this Request as it seeks documents that have already been produced. Defendant and Counterclaim Plaintiff objects to this Request on the grounds that it is obtainable from other sources that are more convenient, less burdensome, and less expensive.

This Request is also overbroad and unduly burdensome to the point of harassment, is not calculated to lead to the discovery of information relevant to the subject matter of this action, and seeks information related to matters beyond the scope of the asserted claims and defenses in this suit because on December 18, 2020, the Fairfax County Circuit Court ruled that Request 43 of Mr. Depp's 3rd Requests for Documents seeking all communications between Ms. Heard and anyone relating to her relationship with Mr. Depp, claims of abuse or violence involving Mr. Depp, and injuries Ms. Heard contends she suffered as a result of Mr. Depp's conduct was overbroad, and therefore held that Request and this Request are beyond the scope of discovery in this case. The Fairfax County Circuit Court also ruled that Request 52 of Mr. Depp's 3rd Requests for Documents seeking all documents and communications relating to Ms. Heard's "relationship with Mr. Depp" was also overbroad, and therefore held that Request and this Request are beyond the scope of discovery in this case. These Orders should apply the same to these Requests for Production to Defendant and Counterclaim Plaintiff.

RESPONSE: Subject to and without waiving the objections, Defendant and Counterclaim Plaintiff has produced or will produce non-privileged and non-work product documents in her possession, custody, and control responsive to this Request that refer to or

reflect the incident in Los Angeles on December 15, 2015, if any.

32. All Documents and Communications that refer, reflect, or relate to the incident at Your “Birthday party, April 2016” referenced in Your Witness Statement at paragraphs 148-154.

OBJECTION: Defendant and Counterclaim Plaintiff objects to the phrase “relate to” of this Request on the grounds that it is vague, ambiguous, and fails to define with particularity the information that it seeks, is overly broad, unduly burdensome, and seeks information not reasonably calculated to lead to the discovery of admissible evidence regarding the claims and defenses in this case, taking into account the needs of the case, the amount in controversy, limitations on the parties’ resources, and the importance of the discovery in resolving the issues at stake in this litigation. Defendant and Counterclaim Plaintiff further objects to this Request as it seeks documents that have already been produced. Defendant and Counterclaim Plaintiff further objects to this Request because it seeks information protected by the attorney-client privilege, and on the grounds that this Request invades protected litigation work product and would require disclosure of core opinion work product and mental impression of counsel, which is prohibited by 4:1(b)(3) of the Rules of the Virginia Supreme Court. Plaintiff and Counterclaim Defendant has not made the requisite showing under the Rules.

RESPONSE: Subject to and without waiving the objections, Defendant and Counterclaim Plaintiff has produced or will produce non-privileged and non-work product documents in her possession, custody, and control that refer to or reflect the paragraphs of Defendant and Counterclaim Plaintiff’s Witness Statement referred to in this Request, if any.

33. All Communications from April 21, 2016 through and including the date on which You filed a request for a Domestic Violence Restraining Order on May 27, 2016, between You, on the one hand, and any of the “friends and family” that You describe in paragraph 153 of Your Witness Statement as being “increasingly worried” for Your safety and advising You that You “should leave,” including without limitation: iO Tillett Wright, Raquel Pennington, Whitney Henriquez, and Amanda de Cadenet.

OBJECTION: Defendant and Counterclaim Plaintiff objects to this Request on the grounds that it is vague, ambiguous, and fails to define with particularity the information that it seeks, is overly broad, unduly burdensome, harassing, and seeks information not reasonably calculated to lead to the discovery of admissible evidence regarding the claims and defenses in this case, taking into account the needs of the case, the amount in controversy, limitations on the parties' resources, and the importance of the discovery in resolving the issues at stake in this litigation. For the same reasons, Defendant and Counterclaim Plaintiff objects to this Request as it is not bound by subject matter in any manner whatsoever. Defendant and Counterclaim Plaintiff further objects to this Request as it seeks documents that have already been produced. Defendant and Counterclaim Plaintiff further objects to this Request to the extent it seeks information protected by the attorney-client privilege, and on the grounds that this Request invades protected litigation work product and would require disclosure of core opinion work product and mental impression of counsel, which is prohibited by 4:1(b)(3) of the Rules of the Virginia Supreme Court. Plaintiff and Counterclaim Defendant has not made the requisite showing under the Rules.

RESPONSE: Subject to and without waiving the objections, Defendant and Counterclaim Plaintiff has produced or will produce non-privileged and non-work product documents in her possession, custody, and control that refer to or reflect iO Tillett Wright, Raquel Pennington, Whitney Henriquez, and Amanda de Cadanet being increasingly worried about Defendant and Counterclaim Plaintiff's safety and advising that Defendant and Counterclaim Plaintiff should leave between April 21, 2016-May 27, 2016, if any.

34. All Communications that mention or relate in any way to Mr. Depp from April 21, 2016 through and including the date on which You filed a request for a Domestic Violence Restraining Order on May 27, 2016, between You, on the one hand, and any of

the “friends and family” that You describe in paragraph 153 of Your Witness Statement as being “increasingly worried” for Your safety and advising You that You “should leave,” including without limitation: iO Tillett Wright, Raquel Pennington, Whitney Henriquez, and Amanda de Cadenet.

OBJECTION: Defendant and Counterclaim Plaintiff objects to this Request, including the phrases “relate in any way to,” on the grounds that it is vague, ambiguous, and fails to define with particularity the information that it seeks, is overly broad, unduly burdensome, harassing, and seeks information not reasonably calculated to lead to the discovery of admissible evidence regarding the claims and defenses in this case, taking into account the needs of the case, the amount in controversy, limitations on the parties’ resources, and the importance of the discovery in resolving the issues at stake in this litigation. Defendant and Counterclaim Plaintiff further objects to this Request as it seeks documents that have already been produced. Defendant and Counterclaim Plaintiff further objects to this Request as duplicative of Request for Production 33. Defendant and Counterclaim Plaintiff further objects to this Request to the extent it seeks information protected by the attorney-client privilege, and on the grounds that this Request invades protected litigation work product and would require disclosure of core opinion work product and mental impression of counsel, which is prohibited by 4:1(b)(3) of the Rules of the Virginia Supreme Court. Plaintiff and Counterclaim Defendant has not made the requisite showing under the Rules.

RESPONSE: Subject to and without waiving the objections, Defendant and Counterclaim Plaintiff has produced or will produce non-privileged and non-work product documents in her possession, custody, and control that refer to or reflect iO Tillett Wright, Raquel Pennington, Whitney Henriquez, and Amanda de Cadenet being increasingly worried about Defendant and Counterclaim Plaintiff’s safety and advising that Defendant and Counterclaim Plaintiff should leave between April 21, 2016-May 27, 2016, if any.

35. All Documents and Communications that refer, reflect, or relate to the alleged incident in “Los Angeles, 21 May 2016” referenced in Your Witness Statement at paragraphs 155-175.

OBJECTION: Defendant and Counterclaim Plaintiff objects to the phrase “relate to” of this Request on the grounds that it is vague, ambiguous, and fails to define with particularity the information that it seeks, is overly broad, unduly burdensome, and seeks information not reasonably calculated to lead to the discovery of admissible evidence regarding the claims and defenses in this case, taking into account the needs of the case, the amount in controversy, limitations on the parties’ resources, and the importance of the discovery in resolving the issues at stake in this litigation. Defendant and Counterclaim Plaintiff further objects to this Request as it seeks documents that have already been produced. Defendant and Counterclaim Plaintiff further objects to this Request because it seeks information protected by the attorney-client privilege, and on the grounds that this Request invades protected litigation work product and would require disclosure of core opinion work product and mental impression of counsel, which is prohibited by 4:1(b)(3) of the Rules of the Virginia Supreme Court. Plaintiff and Counterclaim Defendant has not made the requisite showing under the Rules.

RESPONSE: Subject to and without waiving the objections, Defendant and Counterclaim Plaintiff has produced or will produce non-privileged and non-work product documents in her possession, custody, and control that refer to or reflect the paragraphs of Defendant and Counterclaim Plaintiff’s Witness Statement referred to in this Request, if any.

36. All Documents and Communications that mention, refer, or relate in any way to Mr. Depp in May of 2016.

OBJECTION: Defendant and Counterclaim Plaintiff objects to this Request having no limitations on subject matter and on the grounds that it is vague, ambiguous, and fails to define

with particularity the information that it seeks, is overly broad, unduly burdensome, harassing, and seeks information not reasonably calculated to lead to the discovery of admissible evidence regarding the claims and defenses in this case, taking into account the needs of the case, the amount in controversy, limitations on the parties' resources, and the importance of the discovery in resolving the issues at stake in this litigation. Defendant and Counterclaim Plaintiff further objects to this Request as it seeks documents that have already been produced. Defendant and Counterclaim Plaintiff further objects to this Request as duplicative of Request for Production 35. Defendant and Counterclaim Plaintiff further objects to this Request because it seeks information protected by the attorney-client privilege, and on the grounds that this Request invades protected litigation work product and would require disclosure of core opinion work product and mental impression of counsel, which is prohibited by 4:1(b)(3) of the Rules of the Virginia Supreme Court. Plaintiff and Counterclaim Defendant has not made the requisite showing under the Rules.

RESPONSE: Subject to and without waiving the objections, and notwithstanding that Defendant and Counterclaim Plaintiff has produced documents potentially responsive to this overbroad and unduly burdensome Request, Defendant and Counterclaim Plaintiff stands on her objections to this Request.

November 24, 2021

AS TO OBJECTIONS:



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

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
brotenborn@woodsrogers.com
jtreece@woodsrogers.com

*Counsel to Defendant and Counterclaim
Plaintiff Amber Laura Heard*

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing was served this 24th day of November, 2021, 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
acrawford@brownrudnick.com

Camille M. Vasquez, Esq.
BROWN RUDNICK LLP
2211 Michelson Drive
Irvine, CA 92612
Telephone: (949) 752-7100
Facsimile: (949) 252-1514
cvasquez@brownrudnick.com

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



Elaine Charlson Bredehoft

VIRGINIA:

IN THE CIRCUIT COURT OF FAIRFAX COUNTY

JOHN C. DEPP, II,

Plaintiff,

v.

AMBER LAURA HEARD,

Defendant.

Civil Action No.: CL-2019-0002911

ORDER

Upon consideration of Plaintiff's Motion to Compel Independent Mental Examination ("IME") of Defendant Amber Heard ("Plaintiff's Motion"), Defendant's opposition thereto, arguments of counsel, and being fully advised, it is, this 1st day of October, 2021, hereby ORDERED as follows:


1. Plaintiff's Motion is GRANTED.
2. Defendant Amber Heard shall submit to an IME conducted by Dr. Shannon J. Curry, PsyD, MSCP.
3. The IME shall take place on December 10, 2021 and December 17, 2021 at the offices of Curry Psychology Group, 200 Newport Center Drive, Suite 204, Newport Beach, California 92660. Each day shall begin at 9:00 a.m. and continue for a period of seven (7) hours to include a one (1) hour lunch break, two (2) fifteen minute (15 min.) breaks in the morning, two (2) fifteen minute (15 min.) breaks in the afternoon, and any other breaks as needed and agreed to by Ms. Heard and Dr. Curry. No one is allowed to observe the IME. If all or any portion of the examination is recorded, Ms. Heard is entitled to informed consent and shall be

notified of such recording. Such recording shall be reviewed only by Dr. Curry, and no one else is permitted access to it without leave of Court.

4. The IME shall consist of a one-on-one examination and clinical interview between Dr. Curry and Ms. Heard, to include appropriate testing as determined by Dr. Curry based on her training, experience, expertise, and review of relevant materials.

5. The scope of Dr. Curry's IME is not limited to Dr. Hughes' report and shall be Ms. Heard's current mental condition and her mental condition during and preceding relevant events and time frames at issue in Mr. Depp's Complaint and Ms. Heard's Answer and Counterclaim. Dr. Curry's evaluation of Ms. Heard will utilize the same tests that were administered by Ms. Heard's expert, Dr. Hughes, with the caveat that any instruments which are identified as possessing poor retest reliability (variability in results if the test is taken again) or validity concerns will be substituted for measures with greater established validity and reliability.

6. Dr. Curry's evaluation may assess all domains that were a focus of the prior examination by Dr. Hughes, including:

- a. ~~Personality profile, including but not limited to completion of an intake form; collateral interviews with individuals who observed Ms. Heard prior to, during and/or after the alleged trauma;~~ 
- b. Review of relevant records including but not limited to medical records (including ER/urgent care visits); mental health records (therapy, psychiatric medication, treatment in an outpatient or residential facility, former psychological evaluations and all the raw data); school records (grades, enrollment, suspensions/expulsions/truancy, special education services, etc.); arrest records; legal records; employment records; military records; and diaries. Relevant records


must be obtained as far back as necessary for Dr. Curry to determine with a "reasonable degree of certainty" how Ms. Heard was functioning prior to the alleged traumatic event, but not fewer than three to five years prior to the alleged trauma;

- c. post-traumatic stress and Posttraumatic Stress Disorder (PTSD);
- d. characteristics of intimate partner violence (IPV);
- e. coping and adjustment;
- f. psychopathology (including, but not limited to, assessment of mood and anxiety disorder symptoms);
- g. response validity/malingering; and
- h. any other mental condition identified by Dr. Curry during her review of relevant records and/or examination of Ms. Heard

7. Dr. Curry's Rule 4:10 report (the "Report") shall be served on counsel within thirty (30) days of completion of the IME. Counsel for Parties and Dr. Hughes shall have access to the Report.

8. Defendant shall produce to Dr. Curry the raw data collected by Dr. Hughes during her examination of Ms. Heard by November 15, 2021, which shall be treated confidential under the Amended Protective Order. Only Dr. Curry, not counsel for the Parties shall have access to the raw data. Similarly, Dr. Curry shall subsequently produce to only Dr. Hughes her raw data within thirty (30) days completion of the IME and it shall also be treated confidential under the Amended Protective Order.

October 7, 2021


The Honorable Penney S. Azcarate
Chief Judge, Fairfax County Circuit Court

Filed Under Seal-
Subject to Protective Order

Compliance with Rule 1:13 requiring the endorsement of counsel of record is modified by the Court, in its discretion, to permit the submission of the following electronic signatures of counsel in lieu of an original endorsement or dispensing with endorsement.

WE ASK FOR THIS:



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

Camille M. Vasquez (admitted *pro hac vice*)
BROWN RUDNICK LLP
2211 Michelson Drive
Irvine, CA 92612
Telephone: (949) 752-7100
Facsimile: (949) 252-1514
cvasquez@brownrudnick.com

Counsel for Plaintiff John C. Depp, II

SEEN AND EXCEPTED TO:

Elaine Charlson Bredehoft (VSB No. 23766)
Adam S. Nadelhaft (VSB No. 91717)
Clarissa K. Pintado (VSB No. 86882)
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@cbcbclaw.com
anadelhaft@cbcbclaw.com
cpintado@cbcbclaw.com
dmurphy@cbcbclaw.com

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
jrottenborn@woodsrogers.com
jtreece@woodsrogers.com

Counsel to Defendant Amber Laura Heard

VIRGINIA:

IN THE CIRCUIT COURT OF FAIRFAX COUNTY

JOHN C. DEPP, II,

Plaintiff and Counterclaim Defendant,

v.

AMBER LAURA HEARD,

Defendant and Counterclaim Plaintiff.

Civil Action No.: CL-2019-0002911

**CONSENT ORDER RESPECTING PLAINTIFF'S RESPONSES TO
DEFENDANT'S TENTH REQUEST FOR PRODUCTION OF DOCUMENTS**

Plaintiff and Counterclaim Defendant John C. Depp, II, and Defendant and Counterclaim Plaintiff Amber Laura Heard, by counsel, having engaged in extensive meet and confers respecting Defendant's Tenth Request for Production of Documents, and Plaintiff having consented to an Order respecting certain of these discovery requests, as evidenced by their signatures below, it is hereby:

ORDERED Mr. Depp shall produce to counsel for Ms. Heard all non-privileged documents responsive to the Requests from Defendant and Counterclaim Plaintiff's Tenth Request for Production of Documents, no later than 5:00 P.M. EST on September 3, 2021, as follows:

- 1) RFP No. 7 - as modified to delete the words "consulted and/or" and RFP No. 9, both to the extent already in existence, and subject to the right of supplementation;
- 2) RFP No. 11 - to the extent in Plaintiff's possession, custody and control;
- 3) RFP Nos. 13, 16 and 18;

8-9-21 No Env.

- 4) RFP Nos. 12, 14, 15, 17 and 21 – Plaintiff represents he has already produced documents responsive to these requests, but agrees to produce any additional responsive documents in his custody, control and possession;
- 5) RFP No. 19 - Plaintiff represents he has already produced documents responsive to these requests, but agrees to produce any additional responsive documents in his custody, control and possession

SO ORDERED.


August 6, 2021



The Honorable Penney S. Azcarate
Chief Judge, Fairfax County Circuit Court

Compliance with Rule 1:13 requiring the endorsement of counsel of record is modified by the Court, in its discretion, to permit the submission of the following electronic signatures of counsel in lieu of an original endorsement or dispensing with endorsement.


WE ASK FOR THIS:


Elaine Charlson Bredehoft (VSB No. 23766)
Adam S. Nadelhaft (VSB No. 91717)
Clarissa K. Pintado (VSB No. 86882)
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@cbcbllaw.com
anadelhaft@cbcbllaw.com
cpintado@cbcbllaw.com
dmurphy@cbcbllaw.com

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
brottenborn@woodsrogers.com
jtreece@woodsrogers.com

Counsel to Defendant/Counterclaim Plaintiff, Amber Laura Heard

SEEN AND CONSENTED TO:

 / *by express permission*
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

Camille M. Vasquez (admitted *pro hac vice*)
BROWN RUDNICK LLP
2211 Michelson Drive
Irvine, CA 92612
Telephone: (949) 752-7100
Facsimile: (949) 252-1514
cvasquez@brownrudnick.com

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

VIRGINIA:

IN THE CIRCUIT COURT OF FAIRFAX COUNTY, VIRGINIA

JOHN C. DEPP, II

Plaintiff,

V.

AMBER LAURA HEARD,

Defendant.

Civil Action No.: CL-2019-0002911

**PLAINTIFF JOHN C. DEPP, II'S RESPONSES AND OBJECTIONS TO DEFENDANT
AMBER LAURA HEARD'S CORRECTED TENTH REQUEST FOR PRODUCTION**

Pursuant to Rule 4:9 of the Rules of the Supreme Court of Virginia, Plaintiff John C. Depp, II ("Plaintiff" and/or "Mr. Depp"), by and through his undersigned counsel, hereby responds and objects to Defendant Amber Laura Heard's ("Defendant" and/or "Ms. Heard") Corrected Tenth Set of Requests for Production of Documents (each, a "Request" and collectively, the "Requests"), dated January 1, 2021 and served in the above captioned action ("Action") as follows:

GENERAL OBJECTIONS

1. These General Objections are incorporated into each specific response to the numbered Requests below as if fully repeated therein and are intended, and shall be deemed, to be in addition to any specific objection included in any response below. The assertion of the same, similar, or additional objections or partial responses to the individual Requests does not waive any of Plaintiff's General Objections. Failure to make a specific reference to any General Objection is not a waiver of any General Objection.

this Request on the grounds and to the extent that it seeks expert discovery that is premature and/or beyond the scope of expert discovery permitted under the applicable rules. Plaintiff further objects to this request on the grounds that it is vague and ambiguous. Plaintiff further objects to this request on the grounds that it is lacking in reasonable particularity. Plaintiff further objects to this request on the grounds that it is not reasonably tailored to the claims and defenses in this case and is harassing and overbroad.

7. All documents consulted and/or relied upon by any expert identified by you, in providing any opinions in this case, including anything supporting the bases for such opinions.

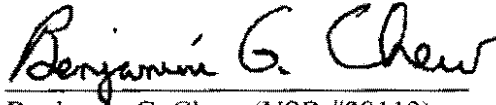
RESPONSE:

Plaintiff repeats and incorporates by this reference the General Objections and Objections to Definitions and Instructions above, as though set forth in full. Plaintiff further objects to this Request on the grounds that it is overbroad, burdensome, and harassing. Plaintiff further objects to this Request on the grounds that it seeks documents that are neither relevant nor reasonably calculated to lead to the discovery of admissible evidence. Plaintiff further objects to this Request on the grounds that it seeks documents protected by the attorney-client privilege and work product doctrine. Plaintiff further objects to this Request on the grounds that it seeks information that is private and personal and protected by law, because, among other reasons, it seeks information related to Plaintiff's personal, financial, and other private matters, that are not at issue in this action and are protected from disclosure. Plaintiff further objects to this Request on the grounds and to the extent that it implicates any other applicable privilege or immunity. Plaintiff further objects to this Request on the grounds that it seeks expert discovery that is premature and/or beyond the scope of expert discovery permitted under the applicable rules, including but not limited to Virginia Supreme Court Rule 4:1.

8. All detailed time and billing records, underlying receipts supporting each expense, and all invoices prepared and billed, from any person or entity providing legal services to you in

Dated: January 22, 2021

Respectfully submitted,

A handwritten signature in black ink that reads "Benjamin G. Chew". The signature is fluid and cursive, with the first name "Benjamin" and last name "Chew" being clearly legible. The middle initial "G." is smaller and less distinct. The signature is written over a horizontal line.

Benjamin G. Chew (VSB #29113)

BROWN RUDNICK, LLP

601 Thirteenth Street NW, Suite 600

Washington, DC 20005

Phone: (202) 536-1785

Fax: (617) 289-0717

bchew@brownrudnick.com

acrawford@brownrudnick.com

Camille M. Vasquez (*pro hac vice*)

BROWN RUDNICK, LLP

2211 Michelson Drive, Seventh Floor

Irvine, CA 92612

Phone: (949) 752-7100

Fax: (949) 252-1514

cvasquez@brownrudnick.com

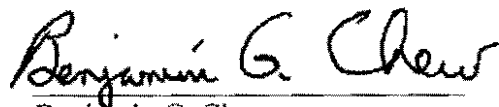
Counsel for Plaintiff John C. Depp, II

CERTIFICATE OF SERVICE

I hereby certify that on this 22 day of January 2021, I caused copies of the foregoing to be served via email (per written agreement between the Parties) on the following:

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
brottenborn@woodsrogers.com
jtreece@woodsrogers.com

Elaine Charlson Bredehoft (VSB No. 23766)
Carla D. Brown (VSB No. 44803)
Adam S. Nadelhaft (VSB No. 91717)
David E. Murphy (VSB No. 90938)
CHARLSON BREDEHOFT COHEN &
BROWN, P.C.
11260 Roger Bacon Dr., Suite 201
Reston, VA 20190
Phone: 703-318-6800
Fax: 703-318-6808
ebredehoft@cbcbllaw.com
cbrown@cbcbllaw.com
anadelhaft@cbcbllaw.com
dmurphy@cbcbllaw.com


Benjamin G. Chew

VIRGINIA:

IN THE CIRCUIT COURT OF FAIRFAX COUNTY

JOHN C. DEPP, II

Plaintiff,

v.

Civil Action No.: CL-2019-0002911

AMBER LAURA HEARD

Defendant.

ORDER

THIS CAUSE comes at the request of Plaintiff John C. Depp, II, by counsel, to require that Defendant Amber L. Heard execute a HIPAA waiver, and

IT APPEARING that the Motion to Compel Execution of HIPAA Releases should be granted, it is hereby:


ORDERED that Defendant Amber L. Heard shall, by July 17, 2020, execute HIPAA waiver(s) authorizing her healthcare providers, including but not limited to the six providers referenced in Defendant's interrogatory responses, to release and disclose to Counsel for Mr. Depp protected health information related to (1) Ms. Heard's medical and psychological treatment stemming from any alleged abuse by Mr. Depp; ~~(2) Ms. Heard's treatment stemming from her abuse of alcohol or drugs; and (3) Ms. Heard's mental health records.~~

ENTERED this 10th day of August, 2020.

The Honorable Bruce D. White
CHIEF JUDGE


DEPP, 8-11-20

WE ASK FOR THIS:


Benjamin G. Chew, Esq. (VSB No. 29113)
Camille M. Vasquez (*pro hac vice*)
BROWN RUDNICK LLP
601 Thirteenth Street, N.W.
Washington, D.C. 20005
Telephone: (202) 536-1700
Facsimile: (202) 536-1701
Email: bchew@brownrudnick.com

Adam R. Waldman, Esq.
THE ENDEAVOR LAW FIRM, P.C.
1775 Pennsylvania Avenue, N.W., Suite 350
Washington, D.C. 20006

SEEN AND OBJECTED TO:

Due 1:13 Waiver 
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
brotenborn@woodsrogers.com
jtreece@woodsrogers.com

Elaine Charlson Bredehoft (VSB No. 23766)
Carla D. Brown (VSB No. 44803)
Adam S. Nadelhaft (VSB No. 91717)
David E. Murphy (VSB No. 90938)
CHARLSON BREDEHOFT COHEN & BROWN, P.C.
11260 Roger Bacon Dr., Suite 201
Reston, VA 20190
Phone: 703-318-6800
Fax: 703-318-6808
ebredehoft@ebcbclaw.com

cbrown@cbcbllaw.com
anahelhaft@cbcbllaw.com
dmurphy@cbcbllaw.com



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Transcript of Hearing

Date: December 18, 2020

Case: Depp, II -v- Heard

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WORLDWIDE COURT REPORTING & LITIGATION TECHNOLOGY

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

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

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

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

1 CERTIFICATE OF SHORTHAND REPORTER-E-NOTARY PUBLIC

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

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

15 My commission expires May 31, 2023.

16
17 *Victoria Lynn Wilson*
18 _____

19 VICTORIA LYNN WILSON
20 E-NOTARY PUBLIC IN AND FOR
21 THE COMMONWEALTH OF VIRGINIA
22

 VIRGINIA:

IN THE CIRCUIT COURT OF FAIRFAX COUNTY

JOHN C. DEPP, II,

Plaintiff,

v.

AMBER LAURA HEARD,

Defendant.

Civil Action No.: CL-2019-0002911

ORDER

THIS MATTER CAME TO BE HEARD upon Plaintiff John C. Depp, II's, ("Plaintiff" or "Mr. Depp") Motion to Compel Defendant Amber Laura Heard ("Defendant"), pursuant to Rule 4:12 of the Rules of the Virginia Supreme Court, to produce all non-privileged documents in response to Plaintiff's Second and Third Sets of Requests for Production of Documents; and supplement Defendant's responses to Plaintiffs Second Interrogatories; and upon consideration of the briefs, exhibits and argument of counsel, it is hereby

ORDERED that Plaintiff's Motion is **GRANTED** in part and **DENIED** in part; and it is further

ORDERED that Defendant Amber Laura Heard shall produce all documents in her possession, custody, and control in response to Plaintiff's Second Set of Request No. 7 on or before January 4, 2021; and it is further

ORDERED that Plaintiff's Motion to Compel No. 23 of the Plaintiff's Second Set of Requests and Nos. 50 and 51 of the Third Set of Requests is denied, for the reasons set forth at the hearing; and it is further

No. 2019-0002911
12/30/20


ORDERED that Plaintiff's Motion to Compel Nos. 42, 43 and 52 of the Plaintiff's Third Set of Requests is denied, for the reasons set forth at the hearing; and it is further

ORDERED that Defendant shall produce all documents in her possession, custody, and control in response to Plaintiff's Third Set of Requests for Production of Documents Nos. 44, 45 and 47 on or before January 4, 2021; and it is further

ORDERED that Defendant shall supplement Defendant's responses to Plaintiff's Second Interrogatories Nos. 1, 7 and 9.

SO ORDERED.

Dated: December 30, 2020


Hon. Bruce D. White
Chief Judge, Fairfax County Circuit Court

Compliance with Rule 1:13 requiring the endorsement of counsel of record is modified by the Court, in its discretion, to permit the submission of the following electronic signatures of counsel in lieu of an original endorsement or dispensing with endorsement.

WE ASK FOR THIS:

**Endorsement Waived
Per Rule 1:13**

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

Camille M. Vasquez (admitted *pro hac vice*)
BROWN RUDNICK LLP
2211 Michelson Drive
Irvine, CA 92612
Telephone: (949) 752-7100
Facsimile: (949) 252-1514
cvasquez@brownrudnick.com

Counsel for Plaintiff John C. Depp, II

SEEN AND EXCEPTED TO FOR THE REASONS SET FORTH IN THE MEMORANDUM
AND AT THE HEARING:

**Endorsement Waived
Per Rule 1:13**

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
jbrottenborn@woodsrogers.com
jtreece@woodsrogers.com

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@cbcbllaw.com
anadelhaft@cbcbllaw.com
dmurphy@cbcbllaw.com

Counsel to Defendant Amber Laura Heard

VIRGINIA:

IN THE CIRCUIT COURT OF FAIRFAX COUNTY

JOHN C. DEPP, II

Plaintiff,

v.

Civil Action No.: CL-2019-0002911

AMBER LAURA HEARD

Defendant.

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

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

GENERAL OBJECTIONS

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

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

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

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

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

RESPONSE:

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

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

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

RESPONSE:

RESPONSE:

Defendant objects to this request on the grounds that it is overbroad and unduly burdensome, and because the information sought is neither relevant to any issue in this litigation, nor reasonably calculated to lead to the discovery of admissible evidence. Defendant also objects to this request on the grounds that it seeks information that is protected by the joint and/or common interest privilege.

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

51. All Documents, including all Communications, that refer, reflect, or relate to the UK Action.

RESPONSE:

Defendant objects to this request on the grounds that it is overbroad and unduly burdensome, and because the information sought is neither relevant to any issue in this litigation, nor reasonably calculated to lead to the discovery of admissible evidence. Defendant further objects to this request to the extent it seeks information that is already available to and equally accessible to Plaintiff. Defendant objects to this request to the extent it seeks privileged information protected from disclosure, including information protected by the attorney-client privilege or work product doctrine and any other applicable privilege, immunity or protection.

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

52. All Documents, including all Communications, that refer, reflect, or relate to Your relationship with Mr. Depp.

RESPONSE:

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

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

53. All Communications between You or anyone acting on Your behalf, on the one hand, and any member of the news media, on the other hand, that refer, reflect, or relate to Your relationship with Mr. Depp, this Action, Divorce Action, the U.K. Action, or the subject matter of any of the same.

RESPONSE:

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

September 4, 2020

AS TO OBJECTIONS:



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@cbcbllaw.com
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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
brottenborn@woodsrogers.com
jtreece@woodsrogers.com

Counsel to Defendant Amber Laura Heard

CERTIFICATE OF SERVICE

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

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

Camille M. Vasquez, Esq.
BROWN RUDNICK LLP
2211 Michelson Drive
Irvine, CA 92612
Telephone: (949) 752-7100
Facsimile: (949) 252-1514
cvasquez@brownrudnick.com

Adam R. Waldman, Esq.
THE ENDEAVOR LAW FIRM, P.C.
1775 Pennsylvania Avenue, N.W., Suite 350
Washington, DC 20006
awaldman@theendeavorgroup.com

Counsel for Plaintiff John C. Depp, II


Elaine Charlson Bredcheft (VSB No. 23766)

VIRGINIA:

IN THE CIRCUIT COURT OF FAIRFAX COUNTY

JOHN C. DEPP, II,

Plaintiff and Counterclaim Defendant,

v.

AMBER LAURA HEARD,

Defendant and Counterclaim Plaintiff.

Civil Action No.: CL-2019-0002911

CONSENT ORDER

Defendant and Counterclaim Plaintiff Amber Laura Heard ("Ms. Heard") and Plaintiff and Counterclaim Defendant John C. Depp, II ("Ms. Depp"), by counsel, having met and conferred regarding Mr. Depp's ~~Fourth Set of Interrogatories ("Fourth Interrogatories")~~, Tenth Set of Requests for Production ("Tenth RFPs") and Eleventh Set of Requests for Production ("Eleventh RFPs") and having reached agreement on the following as evidenced by their signatures below, and it is hereby: ~~ORDERED~~ as follows:

~~Pursuant to Va. R. S. Ct. 4:8(g), the Court for good cause authorizes the service of an additional fifteen (15) interrogatories by Ms. Heard, and an additional nine (9) interrogatories by Mr. Depp (in addition to the six interrogatories contained in Mr. Depp's Fourth Interrogatories), without regard to the number of interrogatories that have previously been served by either party. With respect to Mr. Depp's Fourth Interrogatories, Ms. Heard will serve substantive responses within twenty-one thirty days of this Order. The Parties may mutually agree to an extension of time to respond to each other's interrogatories, as appropriate.~~

~~It is further~~ **ORDERED** that Ms. Heard shall produce all non-privileged documents responsive to Mr. Depp's Tenth RFPs, in the form set forth below:

1. ~~All Documents and Communications that refer, reflect, or discuss the “forensic psychological evaluation of Ms. Heard” conducted by Dr. Dawn Hughes and referenced in Your Disclosure of Expert Witnesses.~~

2. ~~All notes and other records of the “forensic psychological evaluation of Ms. Heard” conducted by Dr. Dawn Hughes and referenced in Your Disclosure of Expert Witnesses.~~

3. ~~All Any Documents relied on by Dr. Dawn Hughes in providing any opinions in this case, including anything supporting the bases for such opinions, but not the documents excluded by the Court’s October 8, 2021 Order (“completion of an intake form” and “collateral interviews with individuals who observed Ms. Heard prior to, during, and/or after the alleged trauma”). in conducting the “forensic psychological evaluation of Ms. Heard” referenced in Your Disclosure of Expert Witnesses.~~

4. ~~All Documents that memorialize the tests and test results conducted in connection with the “forensic psychological evaluation of Ms. Heard” referenced in Your Disclosure of Expert Witnesses.~~

5. ~~All Documents that memorialize, refer, or reflect the “collateral interviews” with Ms. Heard’s therapists, including Dr. Bonnie Jacobs and Dr. Connell Cowan, conducted in connection with the “forensic psychological evaluation of Ms. Heard” referenced in Your Disclosure of Expert Witnesses.~~

6. ~~All Documents that memorialize, refer, or reflect the “collateral interview” with Paige Heard in connection with the “forensic psychological evaluation of Ms. Heard” referenced in Your Disclosure of Expert Witnesses.~~

7. ~~All Documents and Communications within five years prior to the commencement of Your relationship with Mr. Depp that memorialize, refer, reflect, or evidence any diagnosis of You with any of the mental, emotional, or psychological disorders or harm referred to in Your Disclosure of Expert Witnesses, including without limitation the following: “posttraumatic stress disorder,” “stress, anxiety, nightmares, crying, flashbacks, feeling afraid, emotional numbing, dissociation, struggles with trusting others, significant sleep disruption, relationship and intimacy problems, interpersonal disconnection, hypervigilance, and intense psychological pain.”~~

8. ~~All Documents and Communications during or after Your relationship with Mr. Depp that memorialize, refer, reflect, or evidence any diagnosis of You with any of the mental, emotional, or psychological disorders or harm referred to in Your Disclosure of Expert Witnesses, including without limitation the following: “posttraumatic stress disorder”; “stress, anxiety, nightmares, crying, flashbacks, feeling afraid, emotional numbing, dissociation, struggles with trusting others, significant sleep disruption, relationship and intimacy problems, interpersonal disconnection, hypervigilance, and intense psychological pain.”~~

9. ~~All Documents and Communications that memorialize, contain, constitute, refer, reflect, or evidence any psychological or psychiatric evaluation of You in the five years prior to meeting Mr. Depp.~~

10. ~~All Documents and Communications that memorialize, contain, constitute, refer, reflect, or evidence any psychological or psychiatric evaluation of You during Your relationship with Mr. Depp.~~

11. ~~All Documents and Communications that memorialize, contain, constitute, refer, reflect, or evidence any psychological or psychiatric evaluation of You at any time after You filed for divorce from Mr. Depp.~~

12. ~~All Documents and Communications that evidence, refer, or reflect any physical, mental, or other abuse You have suffered at the hands of any other Person, including but not limited to the "abuse at a very young age" referenced by You in the Op Ed.~~

13. ~~All Documents and Communications that evidence, refer, or reflect any physical, mental, or emotional injuries You have ever sustained as a result of any physical, mental, or other abuse at the hands of any other Person, including but not limited to the "abuse at a very young age" referenced by You in the Op Ed.~~

14. ~~All Documents and Communications that evidence, refer, reflect, or relate to any diagnosis of You with any physical, mental, or emotional disorder or harm in connection with any abuse by any other Person (including but not limited to the "abuse at a very young age" referenced by You in the Op Ed), to include without limitation any diagnosis of Post-Traumatic Stress Disorder.~~

15. ~~All Documents and Communications that evidence, refer, reflect, or relate to any treatment You have ever received for any mental or emotional harm in connection with any abuse by any other Person (including but not limited to the "abuse at a very young age" referenced by You in the Op Ed), including but not limited to any diagnosis of Post-Traumatic Stress Disorder.~~

16. ~~All Any Documents and Communications that refer, reflect, or evidence any treatment of You by any therapist, including without limitation Dr. Bonnie Jacobs and Dr. Connell Cowan referring to or reflecting Ms. Heard's medical and psychological treatment stemming from any alleged abuse by Mr. Depp.~~

17. ~~All Documents and Communications (including Documents and Communications in the five years prior to, during, or after Your relationship with Mr. Depp) that refer, reflect, or relate to any treatment for mental health issues, including prescription and management of psychotropic medication by any provider; emergency room, urgent care, or other physician/nurse/EMT encounters related to self harming behavior and/or attempted suicide, drug or alcohol consumption, or physiological symptoms of panic or anxiety (including any of the following: exhaustion, dissociation, feelings of unreality or of being disconnected from one's body, racing heart or heart palpitations, chest pain, extreme fear, confusion, acute muscle pain or cramping, temporary paralysis, numbness in any extremities, sudden sensations of hot or cold, shooting pains, shaking, sweating, dizziness, lightheadedness and/or fainting); therapy services provided on an individual, couples or group basis; church or faith based counseling; psychiatric holds (5150, etc.) at any hospital or other facility; participation for any amount of time in intensive outpatient programming, partial hospitalization programming, or residential treatment programming of You, carried out by any provider (counselor, clergy, therapist, social worker, psychiatrist, nurse, nurse practitioner, or other physician).~~

18. ~~All Documents and Communications reflecting or evidencing Tthe raw data associated with the "forensic psychological evaluation" of Ms. Heard referenced in Your Disclosure of Expert Witnesses and sought by Mr. Depp via the Order on Mr. Depp's Motion to Compel an Independent Examination of Ms. Heard, a copy of which is attached as Exhibit "1."~~

19. ~~All Any~~ Documents and Communications that evidence or reflect any loss of income You have incurred as a result of any conduct by Mr. Depp and/or Adam Waldman alleged in Your Counterclaim.

20. ~~All Any~~ Documents that evidence or reflect any "press requests," relied on by any of Ms. Heard's expert witnesses in providing any opinions in this case as that term is used in Your Disclosure of Expert Witnesses, from January 1, 2010 through and including the present.

21. ~~All Any~~ Documents and Communications that evidence or reflect any "endorsement deals" relied on by any of Ms. Heard's expert witnesses in providing any opinions in this case (as that term is used in Your Disclosure of Expert Witnesses) You have entered into from January 1, 2010 through and including the present.

22. ~~All Any~~ Documents that support, evidence, or reflect any of the "lost career opportunities" relied on by any of Ms. Heard's expert witnesses in providing any opinions in this case referenced in Your Disclosure of Expert Witnesses.

23. Documents sufficient to show Your compensation from any endorsement deals from January 1, 2017 through and including the present, including without limitation any agreements with L'Oreal.

24. ~~Documents sufficient to show Your compensation from any endorsement deals, including without limitation any agreements with L'Oreal.~~

25. ~~Any~~ Documents that support Your contention that You have "received critical and box office acclaim," relied on by any of Ms. Heard's expert witnesses in providing any opinions in this case, as stated in Your Disclosure of Expert Witnesses.

26. ~~All Documents that constitute or refer to any reviews of You or Your performance in any film or television program, from January 1, 2010 through and including the present.~~

27. ~~All Documents that memorialize or discuss the financial success or failure of any film or television program in which You have given a performance, from January 1, 2010 through and including the present.~~

28. ~~All Documents and Communications that discuss, mention, or relate to any of the eight statements that form the basis of Your Counterclaim for defamation.~~

29. ~~All Communications between You and anyone acting on Your behalf, on the one hand, and any actual or potential source of employment or income, on the other hand (including without limitation film studios), regarding any of the eight statements that form the basis of Your Counterclaim for defamation. For purposes of clarity, the term "potential source of employment" as used in this Request shall be understood to refer to persons or entities with whom You contend Your employment prospects have been damaged as a result of any conduct by Mr. Depp.~~

30. ~~All Communications between You and anyone acting on Your behalf, on the one hand, and any actual or potential source of employment or income, on the other hand (including without limitation film studios), regarding Mr. Depp's Complaint and allegations in this Action. For purposes of clarity, the term "potential source of employment" as used in this Request shall be understood to refer to persons or entities with whom You contend Your employment prospects have been damaged as a result of any conduct by Mr. Depp.~~

31. ~~All Communications between You and anyone acting on Your behalf, on the one hand, and any actual or potential source of employment or income, on the other~~

~~hand (including without limitation film studios), regarding Mr. Depp's allegations in the U.K. Action. For purposes of clarity, the term "potential source of employment" as used in this Request shall be understood to refer to persons or entities with whom You contend Your employment prospects have been damaged as a result of any conduct by Mr. Depp.~~

32. ~~All Any~~ Communications between You and anyone acting on Your behalf, on the one hand, and any actual or potential source of employment or income, on the other hand (including without limitation film studios), regarding Adam Waldman from 2018 through the present.

It is further **ORDERED** that Ms. Heard shall produce documents responsive to Mr.

Depp's Eleventh RFPs, as set forth below:

With respect to Mr. Depp's Eleventh RFP Nos. 1, 2, 3, 5, 6, 7, 10, 11, 13, 14, 15, 16, 17, 18, 20, 21, 22, 23, 24, 25, 26, 27, 28, 32, 34, and 35, and 36, Ms. Heard shall produce any responsive, non-privileged documents referring to or reflecting the incidents described in the paragraphs of her Witness Statement described in those Requests, and Mr. Depp shall produce any non-privileged documents referring to or reflecting these same incidents;

With respect to Mr. Depp's Eleventh RFP Nos. 3, 6, 11, 15, 20, 23, 27, and 36, Ms. Heard shall produce any responsive, non-privileged documents she received or sent that mention or refer to Mr. Depp on: March 8, 2013, May 24, 2014; during the parties' stay in Tokyo, during the parties' stay in Australia in March 2015; the dates of the "Staircase Incident"; the August 2015 "Malaysia Train Incident"; the December 15, 2015 Incident; May 21, 2016; and May 27, 2016; and Mr. Depp shall produce any non-privileged documents he received or sent mentioning or referring to Ms. Heard on the same dates/time periods;

With respect to Mr. Depp's Eleventh RFP Nos. 16, 21, 25, and 28, Ms. Heard shall produce any non-privileged documents she received or sent mentioning or referring to Mr. Depp within ten days after the following incidents/time periods: returning from Australia, the "Staircase Incident," the November 2015 Los Angeles Incident, and the December 15, 2015

Incident; and Mr. Depp shall produce any non-privileged documents he received or sent mentioning or referring to Ms. Heard within ten days of the same incidents/time periods;

With respect to Mr. Depp's Eleventh RFP No. 17, Ms. Heard shall produce any non-privileged photographs of the following subjects: herself, Mr. Depp, or the house (including the inside, outside, or any portions) in Australia during Ms. Heard's and Mr. Depp's stay in Australia in March 2015; and Mr. Depp shall produce any non-privileged photographs of the same subjects in March 2015;

With respect to Mr. Depp's Eleventh RFP Nos. 4, 12, 29, 31, and 33, Ms. Heard shall produce nonprivileged responsive documents to the Request, which is modified to read as follows:

4. ~~All Communications concerning the state of Your relationship with Mr. Depp, from and after January 1, 2014, between or among You, on the one hand, and any of the following Persons on the other hand: Whitney Henriquez, Raquel Pennington, Kristina Sexton, Amanda de Cadenet, iO Tillett Wright, Joshua Drew, Paige Heard, and/or David Heard.~~

12. All Communications between or among You, Whitney Henriquez, iO Tillett Wright, Amanda de Cadenet, Kristina Sexton, Joshua Drew, Paige Heard, or David Heard regarding ~~Your engagement or wedding to Mr. Depp. This Request should be understood to encompass any reactions to the news of the wedding; any advice or concerns expressed to You regarding whether or not You should marry Mr. Depp; and any expressions of congratulations. For the avoidance of doubt, this Request should not be interpreted to require the production of documents that merely relate to the logistics of the wedding unless it relates to or the use or abuse of illegal drugs and/or alcohol at Your wedding to Mr. Depp.~~

29. All Documents and Communications that refer to, reflect, or mention the following regarding Your appearance on the "Late Late Show" hosted by James Corden on or about December 16, 2015; ~~For purposes of clarity, this Request is only intended to obtain documents and communications regarding Your actual appearance on the Late Late Show, including without limitation such matters as Your physical appearance or mental condition during Your appearance; any comments made by You to any other Person regarding Your physical appearance or mental condition; and any reactions from other Persons to Your physical appearance or mental condition on the show. It is not intended to require the production of documents that merely reflect the original booking of Your appearance.~~

31. ~~All Communications between You, Raquel Pennington, iO Tillett Wright and/or Melanie Inglessis on December 15, 2015; December 16, 2015; and December 17, 2015 that relate in any way refer to Mr. Depp.~~

33. All Communications from April 21, 2016 through and including the date on which You filed a request for a Domestic Violence Restraining Order on May 27, 2016, between You, on the one hand, and any of the "friends and family" that You describe in paragraph 153 of Your Witness Statement as being that refer to any "friends and family" being "increasingly worried" for Your safety and advising You that You "should leave," including without limitation: iO Tillett Wright, Raquel Pennington, Whitney Henriquez, and Amanda de Cadenet, ~~that relate in any way to Mr. Depp.~~

January __, 2022

The Honorable Penney S. Azcarate
Chief Judge, Fairfax County Circuit Court

Compliance with Rule 1:13 requiring the endorsement of counsel of record is modified by the Court, in its discretion, to permit the submission of the following electronic signatures of counsel in lieu of an original endorsement or dispensing with endorsement.

WE ASK FOR THIS:

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

Camille M. Vasquez (admitted *pro hac vice*)
BROWN RUDNICK LLP
2211 Michelson Drive
Irvine, CA 92612
Telephone: (949) 752-7100
Facsimile: (949) 252-1514
cvasquez@brownrudnick.com

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

SEEN AND CONSENTED TO:

Elaine Charlson Bredehoft (VSB No. 23766)
Adam S. Nadelhaft (VSB No. 91717)
Clarissa K. Pintado (VSB No. 86882)
David E. Murphy (VSB No. 90938)
Charlson Bredehoft Cohen Brown & Nadelhaft, P.C.
11260 Roger Bacon Drive, Suite 201
Reston, Virginia 20190
Telephone: (703) 318-6800
ebredehoft@cbcbllaw.com
anadelhaft@cbcbllaw.com
cpintado@cbcbllaw.com
dmurphy@cbcbllaw.com

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
brottenborn@woodsrogers.com
jtreece@woodsrogers.com

Counsel to Defendant/Counterclaim Plaintiff, Amber Laura Heard

VIRGINIA:

IN THE CIRCUIT COURT OF FAIRFAX COUNTY

JOHN C. DEPP, II,

Plaintiff and Counterclaim defendant,

v.

AMBER LAURA HEARD,

Defendant and Counterclaim Plaintiff.

Civil Action No.: CL-2019-0002911

ORDER

THIS MATTER CAME TO BE HEARD upon Plaintiff and Counterclaim-Defendant John C. Depp, II's ("Mr. Depp") Motion to Compel Responses to Tenth and Eleventh Requests for Production of Documents to Defendant and Counterclaim-Plaintiff Amber Laura Heard ("Ms. Heard") (the "Motion"); and upon consideration of the briefs and argument of counsel, it is hereby:

ORDERED that the Motion is **GRANTED** in part and **DENIED** in part for the reasons set forth in briefing and at the hearing; and it is further

ORDERED that as to Mr. Depp's Tenth Set of Requests for Production of Documents, Ms. Heard shall produce non-privileged documents within her possession, custody, and control responsive to the following revised Requests:

Revised Request 3: Any Documents relied on by Dr. Dawn Hughes in providing any opinions in this case, including anything supporting the bases for such opinions, but not the documents excluded by the Court's October 8, 2021 Order ("completion of an intake form" and "collateral interviews with individuals who observed Ms. Heard prior to, during, and/or after the alleged trauma");

Revised Request 16: Any Documents and Communications that refer, reflect, or evidence any treatment of You by Dr. Bonnie Jacobs and Dr. Connell Cowan referring to or reflecting Ms. Heard's medical and psychological treatment stemming from any alleged abuse by Mr. Depp;

Revised Request 19: Any Documents and Communications that evidence or reflect any loss of income You have incurred as a result of any conduct by Mr. Depp and/or Adam Waldman alleged in Your Counterclaim;

Revised Request 20: Any Documents that evidence or reflect any “press requests” relied on by any of Ms. Heard’s expert witnesses in providing any opinions in this case as that term is used in Your Disclosure of Expert Witnesses, from January 1, 2010 through and including the present;

Revised Request 21: Any Documents and Communications that evidence or reflect any “endorsement deals” relied on by any of Ms. Heard’s expert witnesses in providing any opinions in this case (as that term is used in Your Disclosure of Expert Witnesses) You have entered into from January 1, 2010 through and including the present;

Revised Request 22: Any Documents that support, evidence, or reflect any of the “lost career opportunities” relied on by any of Ms. Heard’s expert witnesses in providing any opinions in this case referenced in Your Disclosure of Expert Witnesses;

Revised Request 23: Documents sufficient to show Your compensation from any endorsement deals from January 1, 2017 through and including the present, including without limitation any agreements with L’Oreal;

Revised Request 25: Any Documents that support Your contention that You have “received critical and box office acclaim,” relied on by any of Ms. Heard’s expert witnesses in providing any opinions in this case, as stated in Your Disclosure of Expert Witnesses;

; and it is further

ORDERED that the Motion to Compel Requests 1, 2, 4-15, 17-18, 24, and 26-31 of Mr. Depp’s Tenth Set of Requests for Production of Documents is denied for the reasons set forth in briefing and at oral argument; and it is further

ORDERED that as to Mr. Depp’s Eleventh Set of Requests for Production of Documents and Ms. Heard’s overlapping Requests, Ms. Heard and Mr. Depp shall each produce the following non-privileged documents within their possession, custody, and control:

With respect to Requests 1, 2, 5, 7, 10, 13, 14, 18, 22, 24, 26, 32, and 35, Ms. Heard shall produce any responsive, non-privileged documents referring to or reflecting the incidents described in the paragraphs of her Witness Statement described in those Requests, and Mr. Depp shall produce any non-privileged documents referring to or reflecting these same incidents;

With respect to Requests 3, 6, 11, 15, 20, 23, 27, and 36, Ms. Heard shall produce any responsive, non-privileged documents she received or sent that mention or refer to Mr. Depp on: March 8, 2013; May 24, 2014; during the parties' stay in Tokyo; during the parties' stay in Australia in March 2015; the dates of the "Staircase Incident"; the August 2015 "Malaysia Train Incident"; the December 15, 2015 Incident; May 21, 2016; and May 27, 2016; and Mr. Depp shall produce any non-privileged documents he received or sent mentioning or referring to Ms. Heard for the same dates/time periods;

With respect to Requests 16, 21, 25, and 28, Ms. Heard shall produce any non-privileged documents she received or sent mentioning or referring to Mr. Depp within ten days after the following incidents/time periods: returning from Australia; the "Staircase Incident"; the November 2015 Los Angeles Incident; and the December 15, 2015 Incident; and Mr. Depp shall produce any non-privileged documents he received or sent mentioning or referring to Ms. Heard within ten days of the same incidents/time periods;

With respect to Request 17, Ms. Heard shall produce any non-privileged photographs of the following subjects: herself, Mr. Depp, or the house (including the inside, outside, or any portions) in Australia during Ms. Heard's and Mr. Depp's stay in Australia in March 2015; and Mr. Depp shall produce any non-privileged photographs of the same subjects in March 2015;

; and it is further

ORDERED that as to Requests 12, 29, and 33 of Mr. Depp's Eleventh Set of Requests for Production of Documents, Ms. Heard shall produce non-privileged documents within her possession, custody, and control responsive to the following revised Requests:

Revised Request 12: Any Communications between or among You, Whitney Henriquez, iO Tillett Wright, Amanda de Cadenet, Kristina Sexton, Joshua Drew, Paige Heard, or David Heard regarding any advice or concerns expressed to You regarding whether or not You should marry Mr. Depp or the use or abuse of illegal drugs and/or alcohol at Your wedding to Mr. Depp;

Revised Request 29: Any Documents and Communications that refer to, reflect, or mention the following regarding Your appearance on the "Late Show" hosted by James Corden on or about December 16, 2015: Your physical appearance or mental condition during Your appearance; any comments made by You to any other Person regarding Your physical appearance or mental condition; and any reactions from other Persons to Your physical appearance or mental condition on the show;

Revised Request 33: Any Communications from April 21, 2016 through and including the date on which You filed a request for a Domestic Violence Restraining Order on May 27, 2016, between You, on the one hand, and any of the "friends and family" that You describe in paragraph 153 of Your Witness Statement that refer to any "friends and

family” being “increasingly worried” for Your safety and advising You that You “should leave,” including without limitation: iO Tillett Wright, Raquel Pennington, Whitney Henriquez, and Amanda de Cadenet;

; and it is further

ORDERED that the Motion to Compel Requests 4, 31, and 34 of Mr. Depp’s Eleventh Set of Requests for Production of Documents is denied for the reasons set forth in briefing and at oral argument; and it is further

ORDERED that Ms. Heard and Mr. Depp shall produce any documents responsive to the above Orders within 30 days of entry of this Order.

SO ORDERED.

January __, 2022

The Honorable Penney S. Azcarate
Chief Judge, Fairfax County Circuit Court

Compliance with Rule 1:13 requiring the endorsement of counsel of record is modified by the Court, in its discretion, to permit the submission of the following electronic signatures of counsel in lieu of an original endorsement or dispensing with endorsement.

SEEN AND _____:

Elaine Charlson Bredehoft (VSB No. 23766)
Adam S. Nadelhaft (VSB No. 91717)
Clarissa K. Pintado (VSB No. 86882)
David E. Murphy (VSB No. 90938)
Charlson Bredehoft Cohen Brown & Nadelhaft, P.C.
11260 Roger Bacon Drive, Suite 201
Reston, Virginia 20190
Telephone: (703) 318-6800
ebredehoft@cbcblaw.com
anadelhaft@cbcblaw.com
cpintado@cbcblaw.com
dmurphy@cbcblaw.com

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
brottenborn@woodsrogers.com
jtreece@woodsrogers.com

Counsel to Defendant/Counterclaim Plaintiff, Amber Laura Heard

SEEN AND _____:

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

Camille M. Vasquez (admitted *pro hac vice*)
BROWN RUDNICK LLP
2211 Michelson Drive
Irvine, CA 92612
Telephone: (949) 752-7100
Facsimile: (949) 252-1514
cvasquez@brownrudnick.com

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