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

DEFENDANT AND COUNTERCLAIM-PLAINTIFF AMBER LAURA HEARD'S MEMORANDUM IN SUPPORT OF MOTION TO COMPEL RESPONSES TO 3RD RFAs AND 14TH, 16TH AND 17TH RFPs TO PLAINTIFF AND COUNTERCLAIM-DEFENDANT JOHN C. DEPP, II

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Counsel to Defendant and Counterclaim-Plaintiff Amber Laura Heard

Ms. Heard seeks the same relief on the 3rd RFAs that the Court Ordered for the 4th and 5th RFAs- clear and unqualified "admit or deny" responses and the production of supporting documents (**Att. 1**)- and further moves to compel her 14th, 16th, and 17th RFPs (**Atts. 2-4**).

I. THIRD REQUESTS FOR ADMISSIONS

Ms. Heard has been attempting to obtain "admit or deny" responses from Mr. Depp on her 3rd RFAs since they were served in November 2020—*15 months ago*. **Att. 1**. Mr. Depp's responses to RFAs 1-14, 19-22, 27-49, 61-85, 102, 106, 114-18, 122-24, 128, 130, 134, and 137-74 contain similar improper qualification language that led the Court to enter an Order on the 4th and 5th RFAs, requiring Mr. Depp to "admit or deny the authenticity of the documents in Ms. Heard's 4th and 5th Requests for Admissions, and for those denied by Mr. Depp shall produce all nonprivileged documents, if any, supporting such denials." **Att. 5**. On October 29, 2021, Mr. Depp's counsel committed that "[o]nce we have the forensic imaging we can admit or deny- And we'll be happy to do that." **Att. 6**, at 42:19-43:2. But Mr. Depp never supplemented his responses by admitting or denying these RFAs. Ms. Heard proposed the exact relief sought in this Motion in multiple meet and confers, but Mr. Depp did not agree. Therefore, Ms. Heard respectfully requests that the Court enter the same "admit or deny" Order for these 3rd RFAs as it did for the 4th and 5th RFAs. **Att. 14**.

II. SEVENTEENTH REQUESTS FOR PRODUCTION OF DOCUMENTS

At the January 7 hearing on Mr. Depp's motion, Ms. Heard attempted to avoid burdening the Court, the parties, and the Conciliator with portions of Ms. Heard's 17th RFPs that directly overlapped with Mr. Depp's RFPs: documents referring to or reflecting the incidents described in the parties' UK Witness Statements and Declarations submitted in this case. **Att. 2**, RFPs 48-59, 65-72, 79-91, and 106-19. Ms. Heard argued that the Court had limited remaining available Fridays and Ms. Heard could not:

> get these documents in a motion until mid February," and "rather than take up time with lengthy emails between myself and Mr. Chew's associate...taking up another court motion- and we believe Mr. Depp will not produce these documents absent- because he knows the Court can't compel them until mid February which means they wont be produced until close to or after the discovery cutoff- let's just address this now.

Att. 7, at 34:20-36:16. Mr. Depp responded that "[w]ith respect to what Mr. Depp is gaming. I mean, that's ridiculous. That's not how we operate. That's maybe how some people operate. It's not how we operate." *Id.* at 37:19-22.

But this is *precisely* how Mr. Depp "operates." Ms. Heard repeatedly attempted to meet and confer with Mr. Depp for over five weeks between December 13, 2021-January 21, 2022, but Mr. Depp never substantively responded or provided dates and times for a meet and confer until January 25, 2022. **Att. 8**. Ms. Heard kept trying throughout this period, and on January 17, 2022 sent Mr. Depp a Consent Order with the same relief Ms. Heard now seeks in this Motion. **Att. 9**. The parties finally met and conferred on January 25 and counsel for Mr. Depp indicated that he expected to reach agreement on these RFPs, but during the final meet and confer on January 27 did not agree. The Court should overrule Mr. Depp's objections except for privilege, and compel the production of any responsive documents. **Att. 14**.

III. FOURTEENTH REQUESTS FOR PRODUCTION OF DOCUMENTS

Ms. Heard attempted to resolve these RFPs for five weeks while Mr. Depp never responded. **Att. 8**. So on January 18, Ms. Heard sent Mr. Depp a Consent Order with the same relief Ms. Heard now seeks in this Motion. **Att. 10**. The parties finally met and conferred on January 25 and completed the meet and confer on January 27, but Mr. Depp still did not agree.

RFPs 1-3 seek documents supporting Mr. Depp's statements to Christian Carino in the audio recording produced by Mr. Depp as DEPP8296 on three relevant topics:

1. "[I] have gotten emails from every fucking studio fucking head from every motherfucker, I didn't do a thing. 'I'm sorry you're going through this. I'm so sorry.' Clearly she's out of her fucking mind. She is viewed as out of her fucking mind across the globe." (RFP 1);

2. "There ain't no motherfucker in this business going to hire her" and "Oh, she's ruined. For sure. She did that herself. In terms of the business, she's a wrap" (RFPs 2-3).

Att. 3. Mr. Depp asserted extensive objections, and refused to produce any documents. *Id.* RFP 1 is relevant to Mr. Depp's alleged damages, because if "every fucking studio fucking head" emailed Mr. Depp that he "didn't do a thing" and that Ms. Heard "is viewed as out of her fucking mind," then Mr. Depp has no damages. Mr. Depp either admitted to the existence of documents refuting his alleged damages, or was lying. The only way to know is to compel Mr. Depp to produce the documents allegedly supporting his own statements. RFPs 2-3 are relevant to malice against Ms. Heard, along with Mr. Depp producing documents supporting his own material statements in a conversation with an agent who at the time also worked for Ms. Heard.

RFP 13 seeks communications between Mr. Depp (or his agents or employees) and any journalist, newspaper, or publication referring to or reflecting any recordings of Mr. Depp or Ms. Heard, to which Mr. Depp asserted extensive objections, but did not claim no documents existed (**Att. 3**), even though Mr. Depp has repeatedly denied allegations that Mr. Depp's team leaked any recordings to the press. Nor has Mr. Depp claimed in the parties' meet and confer that no documents existed. The documents are relevant to the status of each parties' reputation, and to Mr. Depp's credibility, and Mr. Depp should produce them.

RFP 14 seeks communications between Mr. Depp (or his agents or employees) and any journalist, newspaper, or publication referring to any purported investigation of Ms. Heard in Australia. **Att. 3**. The issue of the parties' dogs in Australia has arisen multiple times, with the parties blaming each other. This RFP is relevant and narrowly tailored.

The Court should overrule Mr. Depp's objections to RFPs 1-3 and 13-14 except for privilege, and compel the production of any responsive documents. **Att. 14**.

IV. SIXTEENTH REQUESTS FOR PRODUCTION OF DOCUMENTS

Ms. Heard unsuccessfully attempted to resolve these RFPs through emails and a Consent Order. **Atts. 8, 10**. The objections should be overruled and responsive documents produced.

"Monster" and Mr. Depp's Anger: The parties' use of the word "monster" concerning Mr. Depp's conduct, and the specific conduct it refers to, is a disputed factual issue central to the case. *See, e.g.*, **Att. 11**. Ms. Heard contends "monster" refers to Mr. Depp's alter-ego that repeatedly violently abused her while heavily intoxicated on drugs and alcohol. Mr. Depp contends the word refers to something else. Thus RFP 1 seeks communications containing the word "monster" during the parties' relationship. **Att. 4**. Mr. Depp asserted his boilerplate objections and refused to produce any documents, but the jury should have a full and fair opportunity to consider the meaning of "monster" in this case. RFP 40 further seeks documents reflecting instances of Mr. Depp's anger towards individuals or reflect anger management. *Id.*

Consumption of Alcohol or Drugs: RFP 39 seeks any documents referring to Mr. Depp's use or abuse of alcohol or drugs during the defined Depp Abuse of Heard Dates, the Depp Alleged Abuse by Heard Dates, or the Property Damage Dates, but Mr. Depp objected and refused to produce any documents. **Att. 4**. As just described, Mr. Depp's use and abuse of alcohol and drugs correlate with the dates he abused Ms. Heard, and Mr. Depp's level of intoxication directly affects his credibility and the veracity of his memory and recollections at these times and the times he falsely claims he was abused by Ms. Heard. RFP 42 seeks documents referring to or reflecting instances of physical violence by Mr. Depp towards any person or property, but Mr. Depp objected and refused to produce any documents. *Id.* Finally, RFP 43 seeks documents reflecting complaints against Mr. Depp for conduct involving violence, abuse, damage to property, alcohol/drug use or abuse and intoxication, or lateness/tardiness. *Id.*

Negative Impact: RFP 45 seeks documents referring to or reflecting any negative impact of the

Divorce Action, the U.K. Action, or Ms. Heard's allegations of abuse on Mr. Depp's reputation and career. **Att. 4**. These topics are relevant to the causation of Mr. Depp's alleged damages, and Mr. Depp even agrees because he compelled identical Requests, arguing that "Mr. Depp is entitled to explore the relative impact of each of these events on Ms. Heard's career and reputation." **Att. 12**. Yet Mr. Depp still objected and refused to produce any documents.

Affirmative Defenses and Answer Denials: RFPs 2-7 seek non-privileged documents supporting specific quoted statements from Mr. Depp's 4th and 5th Affirmative Defenses regarding Mr. Waldman's agency and authority to make the three defamatory statements going to trial. **Att. 4**. RFPs 8-27 then seek non-privileged documents supporting the statement in Mr. Depp's Answer denying "that particular conduct by Mr. Waldman was authorized by Counterclaim Defendant." *Id.* Mr. Depp objected and refused to produce any documents. As reflected in Ms. Heard's proposed Order, Ms. Heard seeks expedited production of these non-privileged documents for purposes of Mr. Waldman's deposition on February 15, 2022 and for opposing Mr. Depp's Motion for Summary Judgment on this exact issue. **Att. 14**.

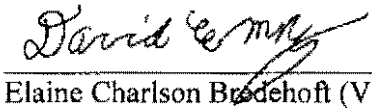
Depp Settlements: RFPs 37, 41, 44, and 46 seek documents referring to allegations, settlement terms, and settlement payments for legal claims of any conduct within the scope of the subject matter of the Court's August 19, 2021 "Other Litigations" Order (**Att. 13**), along with Mr. Depp's efforts to cover up facts and events reflecting negatively upon him. **Att. 4**.

Recordings of Heard: RFP 38 seeks any multimedia containing Ms. Heard in Mr. Depp's possession during the parties' relationship through the present. **Att. 4**.

CONCLUSION

For these reasons, Ms. Heard respectfully requests the Court grant the Motion and enter the attached proposed Order. **Att. 14**.

January 28, 2022



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Counsel to Defendant and Counterclaim-Plaintiff, Amber Laura Heard

CERTIFICATE OF SERVICE

I certify that on this 28th day January, 2022, a copy of the foregoing was served by email, by agreement of the parties, addressed as follows:

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

David E. Murphy

V I R G I N I A :

IN THE CIRCUIT COURT OF FAIRFAX COUNTY, VIRGINIA

JOHN C. DEPP, II	:	
	:	
Plaintiff,	:	
	:	
v.	:	
	:	
AMBER LAURA HEARD,	:	
	:	Civil Action No.: CL-2019-0002911
Defendant.	:	
	:	
	:	
	:	

PLAINTIFF JOHN C. DEPP, II'S RESPONSES AND OBJECTIONS TO DEFENDANT AMBER LAURA HEARD'S THIRD REQUESTS FOR ADMISSION

Pursuant to Rule 4:11 of the Rules of the Supreme Court of Virginia, Plaintiff John C. Depp, II, by and through his undersigned counsel, hereby responds and objects to Defendant Amber Laura Heard's Third Set of Request For Admission (each, a "Request" and collectively, the "Requests"), dated October 20, 2020 and served in the above captioned action ("Action") as follows:

GENERAL OBJECTIONS

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

2. Plaintiff objects to the Requests to the extent they purport to call for information that: (a) is subject to the attorney-client privilege; (b) constitutes attorney work product; (c) includes information protected from disclosure based on common interest or a similar privilege; or (d) is otherwise protected from disclosure under applicable privilege, law, or rule. Plaintiff

thigh, or buttocks; or (b) direct contact between any part of a third party's body and Your genitalia, anus, groin, breast, inner thigh.

RESPONSE: Plaintiff objects to this definition as overly broad and unduly burdensome, vague and ambiguous to the extent it seeks to impose burdens beyond those required by the Rules. This term is overly broad in its ten year scope, and vague and ambiguous in its use of the terms "direct contact" and "sexual manner." Plaintiff further objects to this term to the extent that it is inflammatory and harassing, assumes facts not in evidence, lacks foundation, calls for a medical and/or legal conclusion and seeks information unrelated to this case and that is unlikely to lead to the discovery of admissible evidence. Plaintiff will agree to meet and confer with Defendant regarding this term.

t. ***You and/or Your.*** The terms "You" and/or "Your" refer to the recipient(s) of these discovery requests, as well as all persons and entities over which said recipient has "control" as understood by the Rules of this Court.

RESPONSE: No objection.

REQUESTS FOR ADMISSION

1. Please admit that the photograph Bates Stamped AHA_00000002 is a true, genuine, and accurate depiction of the image displayed in the photograph.

ANSWER:

Plaintiff objects to this request to the extent it seeks information that is in the possession, custody or control of Defendant or third parties. Plaintiff further objects to this request to the extent it seeks information that is available to and equally accessible to Defendant. Plaintiff 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. Plaintiff objects to this request to the extent it seeks expert evidence. Plaintiff further objects to this request as the request is compound. Plaintiff objects to this request because the request does not have the specific document appended to the request. Subject to the foregoing specific and general objections, Plaintiff admits

the photograph referred to in the request appears to be a photograph of the Defendant. Plaintiff, after a reasonable inquiry, is unable to admit or deny the photograph is a "true, genuine and accurate depiction of the image displayed in the photograph" to the extent there is a depiction of an injury or injuries in the image.

2. Please admit that the photograph Bates Stamped AHA_00000002_B is a true, genuine, and accurate depiction of the image displayed in the photograph.

ANSWER:

Plaintiff objects to this request to the extent it seeks information that is in the possession, custody or control of Defendant or third parties. Plaintiff further objects to this request to the extent it seeks information that is available to and equally accessible to Defendant. Plaintiff 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. Plaintiff objects to this request to the extent it seeks expert evidence. Plaintiff further objects to this request as the request is compound. Plaintiff objects to this request because the request does not have the specific document appended to the request. Subject to the foregoing specific and general objections, Plaintiff admits the photograph referred to in the request appears to be a photograph of the Defendant. Plaintiff, after a reasonable inquiry, is unable to admit or deny the photograph is a "true, genuine and accurate depiction of the image displayed in the photograph" to the extent there is a depiction of an injury or injuries in the image.

3. Please admit that the photograph Bates Stamped AHA_00000003 is a true, genuine, and accurate depiction of the image displayed in the photograph.

ANSWER:

Plaintiff objects to this request to the extent it seeks information that is in the possession, custody or control of Defendant or third parties. Plaintiff further objects to this request to the

extent it seeks information that is available to and equally accessible to Defendant. Plaintiff 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. Plaintiff objects to this request to the extent it seeks expert evidence. Plaintiff further objects to this request as the request is compound. Plaintiff objects to this request because the request does not have the specific document appended to the request. Subject to the foregoing specific and general objections, Plaintiff admits the photograph referred to in the request appears to be a photograph of the Defendant. Plaintiff, after a reasonable inquiry, is unable to admit or deny the photograph is a "true, genuine and accurate depiction of the image displayed in the photograph" to the extent there is a depiction of an injury or injuries in the image.

4. Please admit that the photograph Bates Stamped AHA_00000004 is a true, genuine, and accurate depiction of the image displayed in the photograph.

ANSWER:

Plaintiff objects to this request to the extent it seeks information that is in the possession, custody or control of Defendant or third parties. Plaintiff further objects to this request to the extent it seeks information that is available to and equally accessible to Defendant. Plaintiff 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. Plaintiff objects to this request to the extent it seeks expert evidence. Plaintiff further objects to this request as the request is compound. Plaintiff objects to this request because the request does not have the specific document appended to the request. Subject to the foregoing specific and general objections, Plaintiff admits the photograph referred to in the request appears to be a photograph of the Defendant. Plaintiff,

after a reasonable inquiry, is unable to admit or deny the photograph is a "true, genuine and accurate depiction of the image displayed in the photograph" to the extent there is a depiction of an injury or injuries in the image.

5. Please admit that the photograph Bates Stamped AHA_00000004_B is a true, genuine, and accurate depiction of the image displayed in the photograph.

ANSWER:

Plaintiff objects to this request to the extent it seeks information that is in the possession, custody or control of Defendant or third parties. Plaintiff further objects to this request to the extent it seeks information that is available to and equally accessible to Defendant. Plaintiff 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. Plaintiff objects to this request to the extent it seeks expert evidence. Plaintiff further objects to this request as the request is compound. Plaintiff objects to this request because the request does not have the specific document appended to the request. Subject to the foregoing specific and general objections, Plaintiff admits the photograph referred to in the request appears to be a photograph of the Defendant. Plaintiff, after a reasonable inquiry, is unable to admit or deny the photograph is a "true, genuine and accurate depiction of the image displayed in the photograph" to the extent there is a depiction of an injury or injuries in the image.

6. Please admit that the photograph Bates Stamped AHA_00000005 is a true, genuine, and accurate depiction of the image displayed in the photograph.

ANSWER:

Plaintiff objects to this request to the extent it seeks information that is in the possession, custody or control of Defendant or third parties. Plaintiff further objects to this request to the extent it seeks information that is available to and equally accessible to Defendant. Plaintiff

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. Plaintiff objects to this request to the extent it seeks expert evidence. Plaintiff further objects to this request as the request is compound. Plaintiff objects to this request because the request does not have the specific document appended to the request. Subject to the foregoing specific and general objections, Plaintiff admits the photograph referred to in the request appears to be a photograph of the Defendant. Plaintiff, after a reasonable inquiry, is unable to admit or deny the photograph is a "true, genuine and accurate depiction of the image displayed in the photograph" to the extent there is a depiction of an injury or injuries in the image.

7. Please admit that the photograph Bates Stamped AHA_00000005_B is a true, genuine, and accurate depiction of the image displayed in the photograph.

ANSWER:

Plaintiff objects to this request to the extent it seeks information that is in the possession, custody or control of Defendant or third parties. Plaintiff further objects to this request to the extent it seeks information that is available to and equally accessible to Defendant. Plaintiff 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. Plaintiff objects to this request to the extent it seeks expert evidence. Plaintiff further objects to this request as the request is compound. Plaintiff objects to this request because the request does not have the specific document appended to the request. Subject to the foregoing specific and general objections, Plaintiff admits the photograph referred to in the request appears to be a photograph of the Defendant. Plaintiff, after a reasonable inquiry, is unable to admit or deny the photograph is a "true, genuine and

accurate depiction of the image displayed in the photograph" to the extent there is a depiction of an injury or injuries in the image.

8. Please admit that the photograph Bates Stamped AHA_00000006 is a true, genuine, and accurate depiction of the image displayed in the photograph.

ANSWER:

Plaintiff objects to this request to the extent it seeks information that is in the possession, custody or control of Defendant or third parties. Plaintiff further objects to this request to the extent it seeks information that is available to and equally accessible to Defendant. Plaintiff 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. Plaintiff objects to this request to the extent it seeks expert evidence. Plaintiff further objects to this request as the request is compound. Plaintiff objects to this request because the request does not have the specific document appended to the request. Subject to the foregoing specific and general objections, Plaintiff admits the photograph referred to in the request appears to be a photograph of the Defendant. Plaintiff, after a reasonable inquiry, is unable to admit or deny the photograph is a "true, genuine and accurate depiction of the image displayed in the photograph" to the extent there is a depiction of an injury or injuries in the image.

9. Please admit that the photograph Bates Stamped AHA_00000007 is a true, genuine, and accurate depiction of the image displayed in the photograph.

ANSWER:

Plaintiff objects to this request to the extent it seeks information that is in the possession, custody or control of Defendant or third parties. Plaintiff further objects to this request to the extent it seeks information that is available to and equally accessible to Defendant. Plaintiff 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. Plaintiff objects to this request to the extent it seeks expert evidence. Plaintiff further objects to this request as the request is compound. Plaintiff objects to this request because the request does not have the specific document appended to the request. Subject to the foregoing specific and general objections, Plaintiff admits the photograph referred to in the request appears to be a photograph of the Defendant. Plaintiff, after a reasonable inquiry, is unable to admit or deny the photograph is a "true, genuine and accurate depiction of the image displayed in the photograph" to the extent there is a depiction of an injury or injuries in the image.

10. Please admit that the photograph Bates Stamped AHA_00000008 is a true, genuine, and accurate depiction of the image displayed in the photograph.

ANSWER:

Plaintiff objects to this request to the extent it seeks information that is in the possession, custody or control of Defendant or third parties. Plaintiff further objects to this request to the extent it seeks information that is available to and equally accessible to Defendant. Plaintiff 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. Plaintiff objects to this request to the extent it seeks expert evidence. Plaintiff further objects to this request as the request is compound. Plaintiff objects to this request because the request does not have the specific document appended to the request. Subject to the foregoing specific and general objections, Plaintiff admits the photograph referred to in the request appears to be a photograph of the Defendant. Plaintiff, after a reasonable inquiry, is unable to admit or deny the photograph is a "true, genuine and

accurate depiction of the image displayed in the photograph" to the extent there is a depiction of an injury or injuries in the image.

11. Please admit that the photograph Bates Stamped AHA_00000009 is a true, genuine, and accurate depiction of the image displayed in the photograph.

ANSWER:

Plaintiff objects to this request to the extent it seeks information that is in the possession, custody or control of Defendant or third parties. Plaintiff further objects to this request to the extent it seeks information that is available to and equally accessible to Defendant. Plaintiff 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. Plaintiff objects to this request to the extent it seeks expert evidence. Plaintiff further objects to this request as the request is compound. Plaintiff objects to this request because the request does not have the specific document appended to the request. Subject to the foregoing specific and general objections, Plaintiff admits the photograph referred to in the request appears to be a photograph of the Defendant. Plaintiff, after a reasonable inquiry, is unable to admit or deny the photograph is a "true, genuine and accurate depiction of the image displayed in the photograph" to the extent there is a depiction of an injury or injuries in the image.

12. Please admit that the photograph Bates Stamped AHA_00000027 is a true, genuine, and accurate depiction of the image displayed in the photograph.

ANSWER:

Plaintiff objects to this request to the extent it seeks information that is in the possession, custody or control of Defendant or third parties. Plaintiff further objects to this request to the extent it seeks information that is available to and equally accessible to Defendant. Plaintiff 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. Plaintiff objects to this request to the extent it seeks expert evidence. Plaintiff further objects to this request as the request is compound. Plaintiff objects to this request because the request does not have the specific document appended to the request. Subject to the foregoing specific and general objections, Plaintiff admits the photograph referred to in the request appears to be a photograph of hair and a finger. Plaintiff, after a reasonable inquiry, is unable to admit or deny the photograph is a "true, genuine and accurate depiction of the image displayed in the photograph" to the extent there is a depiction of an injury or injuries in the image.

13. Please admit that the photograph Bates Stamped ALH_00000028 is a true, genuine, and accurate depiction of the image displayed in the photograph.

ANSWER:

Plaintiff objects to this request to the extent it seeks information that is in the possession, custody or control of Defendant or third parties. Plaintiff further objects to this request to the extent it seeks information that is available to and equally accessible to Defendant. Plaintiff 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. Plaintiff objects to this request to the extent it seeks expert evidence. Plaintiff further objects to this request as the request is compound. Plaintiff objects to this request because the request does not have the specific document appended to the request. Subject to the foregoing specific and general objections, Plaintiff admits the photograph referred to in the request appears to be a photograph of legs. Plaintiff, after a reasonable inquiry, is unable to admit or deny the photograph is a "true, genuine and accurate

depiction of the image displayed in the photograph" to the extent there is a depiction of an injury or injuries in the image.

14. Please admit that the photograph Bates Stamped ALH_00000028_B is a true, genuine, and accurate depiction of the image displayed in the photograph.

ANSWER:

Plaintiff objects to this request to the extent it seeks information that is in the possession, custody or control of Defendant or third parties. Plaintiff further objects to this request to the extent it seeks information that is available to and equally accessible to Defendant. Plaintiff 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. Plaintiff objects to this request to the extent it seeks expert evidence. Plaintiff further objects to this request as the request is compound. Plaintiff objects to this request because the request does not have the specific document appended to the request. Subject to the foregoing specific and general objections, Plaintiff admits the photograph referred to in the request appears to be a photograph of the Defendant. Plaintiff, after a reasonable inquiry, is unable to admit or deny the photograph is a "true, genuine and accurate depiction of the image displayed in the photograph" to the extent there is a depiction of an injury or injuries in the image.

15. Please admit that the photograph Bates Stamped ALH_00000505 is a true, genuine, and accurate depiction of the image displayed in the photograph.

ANSWER:

Plaintiff objects to this request as the request is compound. Plaintiff objects to this request because the request does not have the specific document appended to the request. Subject to the foregoing specific and general objections, Plaintiff responds: admit.

16. Please admit that the photograph Bates Stamped ALH_00000505_B is a true, genuine, and accurate depiction of the image displayed in the photograph.

ANSWER:

Plaintiff objects to this request as the request is compound. Plaintiff objects to this request because the request does not have the specific document appended to the request. Subject to the foregoing specific and general objections, Plaintiff responds: admit.

17. Please admit that the photograph Bates Stamped ALH_00000509 is a true, genuine, and accurate depiction of the image displayed in the photograph.

ANSWER:

Plaintiff objects to this request as the request is compound. Plaintiff objects to this request because the request does not have the specific document appended to the request. Subject to the foregoing specific and general objections, Plaintiff responds: admit.

18. Please admit that the photograph Bates Stamped ALH_00000509_B is a true, genuine, and accurate depiction of the image displayed in the photograph.

ANSWER:

Plaintiff objects to this request as the request is compound. Plaintiff objects to this request because the request does not have the specific document appended to the request. Subject to the foregoing specific and general objections, Plaintiff responds: admit.

19. Please admit that the photograph Bates Stamped ALH_00000511 is a true, genuine, and accurate depiction of the image displayed in the photograph.

ANSWER:

Plaintiff objects to this request to the extent it seeks information that is in the possession, custody or control of Defendant or third parties. Plaintiff further objects to this request to the extent it seeks information that is available to and equally accessible to Defendant. Plaintiff 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. Plaintiff objects to this request to the extent it seeks expert evidence. Plaintiff further objects to this request as the request is compound. Plaintiff objects to this request because the request does not have the specific document appended to the request. Subject to the foregoing specific and general objections, Plaintiff admits the photograph referred to in the request appears to be a photograph of the Defendant. Plaintiff, after a reasonable inquiry, is unable to admit or deny the photograph is a "true, genuine and accurate depiction of the image displayed in the photograph" to the extent there is a depiction of an injury or injuries in the image.

20. Please admit that the photograph Bates Stamped ALH_00000511_B is a true, genuine, and accurate depiction of the image displayed in the photograph.

ANSWER:

Plaintiff objects to this request to the extent it seeks information that is in the possession, custody or control of Defendant or third parties. Plaintiff further objects to this request to the extent it seeks information that is available to and equally accessible to Defendant. Plaintiff 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. Plaintiff objects to this request to the extent it seeks expert evidence. Plaintiff further objects to this request as the request is compound. Plaintiff objects to this request because the request does not have the specific document appended to the request. Subject to the foregoing specific and general objections, Plaintiff admits the photograph referred to in the request appears to be a photograph of the Defendant. Plaintiff, after a reasonable inquiry, is unable to admit or deny the photograph is a "true, genuine and accurate depiction of the image displayed in the photograph" to the extent there is a depiction of an injury or injuries in the image.

21. Please admit that the photograph Bates Stamped ALH_00000515 is a true, genuine, and accurate depiction of the image displayed in the photograph.

ANSWER:

Plaintiff objects to this request to the extent it seeks information that is in the possession, custody or control of Defendant or third parties. Plaintiff further objects to this request to the extent it seeks information that is available to and equally accessible to Defendant. Plaintiff 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. Plaintiff objects to this request to the extent it seeks expert evidence. Plaintiff further objects to this request as the request is compound. Plaintiff objects to this request because the request does not have the specific document appended to the request. Subject to the foregoing specific and general objections, Plaintiff admits the photograph referred to in the request appears to be a photograph of the Defendant. Plaintiff, after a reasonable inquiry, is unable to admit or deny the photograph is a "true, genuine and accurate depiction of the image displayed in the photograph" to the extent there is a depiction of an injury or injuries in the image.

22. Please admit that the photograph Bates Stamped ALH_00000515_B is a true, genuine, and accurate depiction of the image displayed in the photograph.

ANSWER:

Plaintiff objects to this request to the extent it seeks information that is in the possession, custody or control of Defendant or third parties. Plaintiff further objects to this request to the extent it seeks information that is available to and equally accessible to Defendant. Plaintiff 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. Plaintiff objects to this request to the extent it

seeks expert evidence. Plaintiff further objects to this request as the request is compound. Plaintiff objects to this request because the request does not have the specific document appended to the request. Subject to the foregoing specific and general objections, Plaintiff admits the photograph referred to in the request appears to be a photograph of the Defendant. Plaintiff, after a reasonable inquiry, is unable to admit or deny the photograph is a "true, genuine and accurate depiction of the image displayed in the photograph" to the extent there is a depiction of an injury or injuries in the image.

23. Please admit that the photograph Bates Stamped ALH_00000517 is a true, genuine, and accurate depiction of the image displayed in the photograph.

ANSWER:

Plaintiff objects to this request as the request is compound. Plaintiff objects to this request because the request does not have the specific document appended to the request. Subject to the foregoing specific and general objections, Plaintiff responds: admit.

24. Please admit that the photograph Bates Stamped ALH_00001586 is a true, genuine, and accurate depiction of the image displayed in the photograph.

ANSWER:

Plaintiff objects to this request as the request is compound. Plaintiff objects to this request because the request does not have the specific document appended to the request. Subject to the foregoing specific and general objections, Plaintiff responds: admit.

25. Please admit that the photograph Bates Stamped ALH_00001586_B is a true, genuine, and accurate depiction of the image displayed in the photograph.

ANSWER:

Plaintiff objects to this request as the request is compound. Plaintiff objects to this request because the request does not have the specific document appended to the request. Subject to the foregoing specific and general objections, Plaintiff responds: admit.

26. Please admit that the photograph Bates Stamped ALH_00000010 is a true, genuine, and accurate depiction of the image displayed in the photograph.

ANSWER:

Plaintiff objects to this request as the request is compound. Plaintiff objects to this request because the request does not have the specific document appended to the request. Subject to the foregoing specific and general objections, Plaintiff responds: admit.

27. Please admit that the photograph Bates Stamped ALH_00000010_B is a true, genuine, and accurate depiction of the image displayed in the photograph.

ANSWER:

Plaintiff objects to this request to the extent it seeks information that is in the possession, custody or control of Defendant or third parties. Plaintiff further objects to this request to the extent it seeks information that is available to and equally accessible to Defendant. Plaintiff 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. Plaintiff objects to this request to the extent it seeks expert evidence. Plaintiff further objects to this request as the request is compound. Plaintiff objects to this request because the request does not have the specific document appended to the request. Subject to the foregoing specific and general objections, Plaintiff admits the photograph referred to in the request appears to be a photograph of the Defendant. Plaintiff, after a reasonable inquiry, is unable to admit or deny the photograph is a "true, genuine and accurate depiction of the image displayed in the photograph" to the extent there is a depiction of an injury or injuries in the image.

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28. Please admit that the photograph Bates Stamped ALH_00000011 is a true, genuine, and accurate depiction of the image displayed in the photograph.

ANSWER:

Plaintiff objects to this request as the request is compound. Plaintiff objects to this request because the request does not have the specific document appended to the request. Subject to the foregoing specific and general objections, Plaintiff, after a reasonable inquiry, is unable to admit or deny the photograph is a "true, genuine and accurate depiction of the image displayed in the photograph" because there is no image.

29. Please admit that the photograph Bates Stamped ALH_00000012 is a true, genuine, and accurate depiction of the image displayed in the photograph.

ANSWER:

Plaintiff objects to this request to the extent it seeks information that is in the possession, custody or control of Defendant or third parties. Plaintiff further objects to this request to the extent it seeks information that is available to and equally accessible to Defendant. Plaintiff 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. Plaintiff objects to this request to the extent it seeks expert evidence. Plaintiff further objects to this request as the request is compound. Plaintiff objects to this request because the request does not have the specific document appended to the request. Subject to the foregoing specific and general objections, Plaintiff admits the photograph referred to in the request appears to be a photograph of the Defendant. Plaintiff, after a reasonable inquiry, is unable to admit or deny the photograph is a "true, genuine and accurate depiction of the image displayed in the photograph" to the extent there is a depiction of an injury or injuries in the image.

30. Please admit that the photograph Bates Stamped ALH_00000013 is a true, genuine, and accurate depiction of the image displayed in the photograph.

ANSWER:

Plaintiff objects to this request to the extent it seeks information that is in the possession, custody or control of Defendant or third parties. Plaintiff further objects to this request to the extent it seeks information that is available to and equally accessible to Defendant. Plaintiff 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. Plaintiff objects to this request to the extent it seeks expert evidence. Plaintiff further objects to this request as the request is compound. Plaintiff objects to this request because the request does not have the specific document appended to the request. Subject to the foregoing specific and general objections, Plaintiff admits the photograph referred to in the request appears to be a photograph of the Defendant. Plaintiff, after a reasonable inquiry, is unable to admit or deny the photograph is a "true, genuine and accurate depiction of the image displayed in the photograph" to the extent there is a depiction of an injury or injuries in the image.

31. Please admit that the photograph Bates Stamped ALH_00000013_B is a true, genuine, and accurate depiction of the image displayed in the photograph.

ANSWER:

Plaintiff objects to this request to the extent it seeks information that is in the possession, custody or control of Defendant or third parties. Plaintiff further objects to this request to the extent it seeks information that is available to and equally accessible to Defendant. Plaintiff 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. Plaintiff objects to this request to the extent it

seeks expert evidence. Plaintiff further objects to this request as the request is compound. Plaintiff objects to this request because the request does not have the specific document appended to the request. Subject to the foregoing specific and general objections, Plaintiff admits the photograph referred to in the request appears to be a photograph of the Defendant. Plaintiff, after a reasonable inquiry, is unable to admit or deny the photograph is a "true, genuine and accurate depiction of the image displayed in the photograph" to the extent there is a depiction of an injury or injuries in the image.

32. Please admit that the photograph Bates Stamped ALH_00000014 is a true, genuine, and accurate depiction of the image displayed in the photograph.

ANSWER:

Plaintiff objects to this request to the extent it seeks information that is in the possession, custody or control of Defendant or third parties. Plaintiff further objects to this request to the extent it seeks information that is available to and equally accessible to Defendant. Plaintiff 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. Plaintiff objects to this request to the extent it seeks expert evidence. Plaintiff further objects to this request as the request is compound. Plaintiff objects to this request because the request does not have the specific document appended to the request. Subject to the foregoing specific and general objections, Plaintiff admits the photograph referred to in the request appears to be a photograph of the Defendant. Plaintiff, after a reasonable inquiry, is unable to admit or deny the photograph is a "true, genuine and accurate depiction of the image displayed in the photograph" to the extent there is a depiction of an injury or injuries in the image.

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33. Please admit that the photograph Bates Stamped ALH_00000014_B is a true, genuine, and accurate depiction of the image displayed in the photograph.

ANSWER:

Plaintiff objects to this request to the extent it seeks information that is in the possession, custody or control of Defendant or third parties. Plaintiff further objects to this request to the extent it seeks information that is available to and equally accessible to Defendant. Plaintiff 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. Plaintiff objects to this request to the extent it seeks expert evidence. Plaintiff further objects to this request as the request is compound. Plaintiff objects to this request because the request does not have the specific document appended to the request. Subject to the foregoing specific and general objections, Plaintiff admits the photograph referred to in the request appears to be a photograph of the Defendant. Plaintiff, after a reasonable inquiry, is unable to admit or deny the photograph is a "true, genuine and accurate depiction of the image displayed in the photograph" to the extent there is a depiction of an injury or injuries in the image.

34. Please admit that the photograph Bates Stamped ALH_00000015 is a true, genuine, and accurate depiction of the image displayed in the photograph.

ANSWER:

Plaintiff objects to this request to the extent it seeks information that is in the possession, custody or control of Defendant or third parties. Plaintiff further objects to this request to the extent it seeks information that is available to and equally accessible to Defendant. Plaintiff 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. Plaintiff objects to this request to the extent it

seeks expert evidence. Plaintiff further objects to this request as the request is compound. Plaintiff objects to this request because the request does not have the specific document appended to the request. Subject to the foregoing specific and general objections, Plaintiff admits the photograph referred to in the request appears to be a photograph of the Defendant. Plaintiff, after a reasonable inquiry, is unable to admit or deny the photograph is a "true, genuine and accurate depiction of the image displayed in the photograph" to the extent there is a depiction of an injury or injuries in the image.

35. Please admit that the photograph Bates Stamped ALH_00000015_B is a true, genuine, and accurate depiction of the image displayed in the photograph.

ANSWER:

Plaintiff objects to this request to the extent it seeks information that is in the possession, custody or control of Defendant or third parties. Plaintiff further objects to this request to the extent it seeks information that is available to and equally accessible to Defendant. Plaintiff 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. Plaintiff objects to this request to the extent it seeks expert evidence. Plaintiff further objects to this request as the request is compound. Plaintiff objects to this request because the request does not have the specific document appended to the request. Subject to the foregoing specific and general objections, Plaintiff admits the photograph referred to in the request appears to be a photograph of the Defendant. Plaintiff, after a reasonable inquiry, is unable to admit or deny the photograph is a "true, genuine and accurate depiction of the image displayed in the photograph" to the extent there is a depiction of an injury or injuries in the image.

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36. Please admit that the photograph Bates Stamped ALH_00000016 is a true, genuine, and accurate depiction of the image displayed in the photograph.

ANSWER:

Plaintiff objects to this request to the extent it seeks information that is in the possession, custody or control of Defendant or third parties. Plaintiff further objects to this request to the extent it seeks information that is available to and equally accessible to Defendant. Plaintiff 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. Plaintiff objects to this request to the extent it seeks expert evidence. Plaintiff further objects to this request as the request is compound. Plaintiff objects to this request because the request does not have the specific document appended to the request. Subject to the foregoing specific and general objections, Plaintiff admits the photograph referred to in the request appears to be a photograph of the Defendant. Plaintiff, after a reasonable inquiry, is unable to admit or deny the photograph is a "true, genuine and accurate depiction of the image displayed in the photograph" to the extent there is a depiction of an injury or injuries in the image.

37. Please admit that the photograph Bates Stamped ALH_00000016_B is a true, genuine, and accurate depiction of the image displayed in the photograph.

ANSWER:

Plaintiff objects to this request to the extent it seeks information that is in the possession, custody or control of Defendant or third parties. Plaintiff further objects to this request to the extent it seeks information that is available to and equally accessible to Defendant. Plaintiff 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. Plaintiff objects to this request to the extent it

seeks expert evidence. Plaintiff further objects to this request as the request is compound. Plaintiff objects to this request because the request does not have the specific document appended to the request. Subject to the foregoing specific and general objections, Plaintiff admits the photograph referred to in the request appears to be a photograph of the top of a head. Plaintiff, after a reasonable inquiry, is unable to admit or deny the photograph is a "true, genuine and accurate depiction of the image displayed in the photograph" to the extent there is a depiction of an injury or injuries in the image.

38. Please admit that the photograph Bates Stamped ALH_00000038 is a true, genuine, and accurate depiction of the image displayed in the photograph.

ANSWER:

Plaintiff objects to this request to the extent it seeks information that is in the possession, custody or control of Defendant or third parties. Plaintiff further objects to this request to the extent it seeks information that is available to and equally accessible to Defendant. Plaintiff 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. Plaintiff objects to this request to the extent it seeks expert evidence. Plaintiff further objects to this request as the request is compound. Plaintiff objects to this request because the request does not have the specific document appended to the request. Subject to the foregoing specific and general objections, Plaintiff admits the photograph referred to in the request appears to be a photograph of the Defendant. Plaintiff, after a reasonable inquiry, is unable to admit or deny the photograph is a "true, genuine and accurate depiction of the image displayed in the photograph" to the extent there is a depiction of an injury or injuries in the image.

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39. Please admit that the photograph Bates Stamped ALH_00000056 is a true, genuine, and accurate depiction of the image displayed in the photograph.

ANSWER:

Plaintiff objects to this request to the extent it seeks information that is in the possession, custody or control of Defendant or third parties. Plaintiff further objects to this request to the extent it seeks information that is available to and equally accessible to Defendant. Plaintiff 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. Plaintiff objects to this request to the extent it seeks expert evidence. Plaintiff further objects to this request as the request is compound. Plaintiff objects to this request because the request does not have the specific document appended to the request. Subject to the foregoing specific and general objections, Plaintiff admits the photograph referred to in the request appears to be a photograph of the Defendant. Plaintiff, after a reasonable inquiry, is unable to admit or deny the photograph is a "true, genuine and accurate depiction of the image displayed in the photograph" to the extent there is a depiction of an injury or injuries in the image.

40. Please admit that the photograph Bates Stamped ALH_00000057 is a true, genuine, and accurate depiction of the image displayed in the photograph.

ANSWER:

Plaintiff objects to this request to the extent it seeks information that is in the possession, custody or control of Defendant or third parties. Plaintiff further objects to this request to the extent it seeks information that is available to and equally accessible to Defendant. Plaintiff 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. Plaintiff objects to this request to the extent it

seeks expert evidence. Plaintiff further objects to this request as the request is compound. Plaintiff objects to this request because the request does not have the specific document appended to the request. Subject to the foregoing specific and general objections, Plaintiff admits the photograph referred to in the request appears to be a photograph of the Defendant. Plaintiff, after a reasonable inquiry, is unable to admit or deny the photograph is a "true, genuine and accurate depiction of the image displayed in the photograph" to the extent there is a depiction of an injury or injuries in the image.

41. Please admit that the photograph Bates Stamped ALH_00000058 is a true, genuine, and accurate depiction of the image displayed in the photograph.

ANSWER:

Plaintiff objects to this request to the extent it seeks information that is in the possession, custody or control of Defendant or third parties. Plaintiff further objects to this request to the extent it seeks information that is available to and equally accessible to Defendant. Plaintiff 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. Plaintiff objects to this request to the extent it seeks expert evidence. Plaintiff further objects to this request as the request is compound. Plaintiff objects to this request because the request does not have the specific document appended to the request. Subject to the foregoing specific and general objections, Plaintiff admits the photograph referred to in the request appears to be a photograph of the Defendant. Plaintiff, after a reasonable inquiry, is unable to admit or deny the photograph is a "true, genuine and accurate depiction of the image displayed in the photograph" to the extent there is a depiction of an injury or injuries in the image.

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42. Please admit that the photograph Bates Stamped ALH_00000059 is a true, genuine, and accurate depiction of the image displayed in the photograph.

ANSWER:

Plaintiff objects to this request to the extent it seeks information that is in the possession, custody or control of Defendant or third parties. Plaintiff further objects to this request to the extent it seeks information that is available to and equally accessible to Defendant. Plaintiff 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. Plaintiff objects to this request to the extent it seeks expert evidence. Plaintiff further objects to this request as the request is compound. Plaintiff objects to this request because the request does not have the specific document appended to the request. Subject to the foregoing specific and general objections, Plaintiff admits the photograph referred to in the request appears to be a photograph of the Defendant. Plaintiff, after a reasonable inquiry, is unable to admit or deny the photograph is a "true, genuine and accurate depiction of the image displayed in the photograph" to the extent there is a depiction of an injury or injuries in the image.

43. Please admit that the photograph Bates Stamped ALH_00000060 is a true, genuine, and accurate depiction of the image displayed in the photograph.

ANSWER:

Plaintiff objects to this request to the extent it seeks information that is in the possession, custody or control of Defendant or third parties. Plaintiff further objects to this request to the extent it seeks information that is available to and equally accessible to Defendant. Plaintiff 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. Plaintiff objects to this request to the extent it

seeks expert evidence. Plaintiff further objects to this request as the request is compound. Plaintiff objects to this request because the request does not have the specific document appended to the request. Subject to the foregoing specific and general objections, Plaintiff admits the photograph referred to in the request appears to be a photograph of the Defendant. Plaintiff, after a reasonable inquiry, is unable to admit or deny the photograph is a "true, genuine and accurate depiction of the image displayed in the photograph" to the extent there is a depiction of an injury or injuries in the image.

44. Please admit that the photograph Bates Stamped ALH_00000061 is a true, genuine, and accurate depiction of the image displayed in the photograph.

ANSWER:

Plaintiff objects to this request to the extent it seeks information that is in the possession, custody or control of Defendant or third parties. Plaintiff further objects to this request to the extent it seeks information that is available to and equally accessible to Defendant. Plaintiff 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. Plaintiff objects to this request to the extent it seeks expert evidence. Plaintiff further objects to this request as the request is compound. Plaintiff objects to this request because the request does not have the specific document appended to the request. Subject to the foregoing specific and general objections, Plaintiff admits the photograph referred to in the request appears to be a photograph of the Defendant. Plaintiff, after a reasonable inquiry, is unable to admit or deny the photograph is a "true, genuine and accurate depiction of the image displayed in the photograph" to the extent there is a depiction of an injury or injuries in the image.

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45. Please admit that the photograph Bates Stamped ALH_00000062 is a true, genuine, and accurate depiction of the image displayed in the photograph.

ANSWER:

Plaintiff objects to this request to the extent it seeks information that is in the possession, custody or control of Defendant or third parties. Plaintiff further objects to this request to the extent it seeks information that is available to and equally accessible to Defendant. Plaintiff 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. Plaintiff objects to this request to the extent it seeks expert evidence. Plaintiff further objects to this request as the request is compound. Plaintiff objects to this request because the request does not have the specific document appended to the request. Subject to the foregoing specific and general objections, Plaintiff admits the photograph referred to in the request appears to be a photograph of the Defendant. Plaintiff, after a reasonable inquiry, is unable to admit or deny the photograph is a "true, genuine and accurate depiction of the image displayed in the photograph" to the extent there is a depiction of an injury or injuries in the image.

46. Please admit that the photograph Bates Stamped ALH_00000063 is a true, genuine, and accurate depiction of the image displayed in the photograph.

ANSWER:

Plaintiff objects to this request to the extent it seeks information that is in the possession, custody or control of Defendant or third parties. Plaintiff further objects to this request to the extent it seeks information that is available to and equally accessible to Defendant. Plaintiff 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. Plaintiff objects to this request to the extent it

seeks expert evidence. Plaintiff further objects to this request as the request is compound. Plaintiff objects to this request because the request does not have the specific document appended to the request. Subject to the foregoing specific and general objections, Plaintiff admits the photograph referred to in the request appears to be a photograph of the Defendant. Plaintiff, after a reasonable inquiry, is unable to admit or deny the photograph is a "true, genuine and accurate depiction of the image displayed in the photograph" to the extent there is a depiction of an injury or injuries in the image.

47. Please admit that the photograph Bates Stamped ALH_00000064 is a true, genuine, and accurate depiction of the image displayed in the photograph.

ANSWER:

Plaintiff objects to this request to the extent it seeks information that is in the possession, custody or control of Defendant or third parties. Plaintiff further objects to this request to the extent it seeks information that is available to and equally accessible to Defendant. Plaintiff 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. Plaintiff objects to this request to the extent it seeks expert evidence. Plaintiff further objects to this request as the request is compound. Plaintiff objects to this request because the request does not have the specific document appended to the request. Subject to the foregoing specific and general objections, Plaintiff admits the photograph referred to in the request appears to be a photograph of the Defendant. Plaintiff, after a reasonable inquiry, is unable to admit or deny the photograph is a "true, genuine and accurate depiction of the image displayed in the photograph" to the extent there is a depiction of an injury or injuries in the image.

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48. Please admit that the photograph Bates Stamped ALH_00000065 is a true, genuine, and accurate depiction of the image displayed in the photograph.

ANSWER:

Plaintiff objects to this request to the extent it seeks information that is in the possession, custody or control of Defendant or third parties. Plaintiff further objects to this request to the extent it seeks information that is available to and equally accessible to Defendant. Plaintiff 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. Plaintiff objects to this request to the extent it seeks expert evidence. Plaintiff further objects to this request as the request is compound. Plaintiff objects to this request because the request does not have the specific document appended to the request. Subject to the foregoing specific and general objections, Plaintiff admits the photograph referred to in the request appears to be a photograph of the Defendant. Plaintiff, after a reasonable inquiry, is unable to admit or deny the photograph is a "true, genuine and accurate depiction of the image displayed in the photograph" to the extent there is a depiction of an injury or injuries in the image.

49. Please admit that the photograph Bates Stamped ALH_00000066 is a true, genuine, and accurate depiction of the image displayed in the photograph.

ANSWER:

Plaintiff objects to this request to the extent it seeks information that is in the possession, custody or control of Defendant or third parties. Plaintiff further objects to this request to the extent it seeks information that is available to and equally accessible to Defendant. Plaintiff 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. Plaintiff objects to this request to the extent it

seeks expert evidence. Plaintiff further objects to this request as the request is compound. Plaintiff objects to this request because the request does not have the specific document appended to the request. Subject to the foregoing specific and general objections, Plaintiff admits the photograph referred to in the request appears to be a photograph of the Defendant. Plaintiff, after a reasonable inquiry, is unable to admit or deny the photograph is a "true, genuine and accurate depiction of the image displayed in the photograph" to the extent there is a depiction of an injury or injuries in the image.

50. Please admit that the photograph Bates Stamped ALH_00000067 is a true, genuine, and accurate depiction of the image displayed in the photograph.

ANSWER:

Plaintiff objects to this request as the request is compound. Plaintiff objects to this request because the request does not have the specific document appended to the request. Subject to the foregoing specific and general objections, Plaintiff responds: admit.

51. Please admit that the photograph Bates Stamped ALH_00000068 is a true, genuine, and accurate depiction of the image displayed in the photograph.

ANSWER:

Plaintiff objects to this request as the request is compound. Plaintiff objects to this request because the request does not have the specific document appended to the request. Subject to the foregoing specific and general objections, Plaintiff responds: admit.

52. Please admit that the photograph Bates Stamped ALH_00000069 is a true, genuine, and accurate depiction of the image displayed in the photograph.

ANSWER:

Plaintiff objects to this request as the request is compound. Plaintiff objects to this request because the request does not have the specific document appended to the request. Subject to the foregoing specific and general objections, Plaintiff responds: admit.

61. Please admit that the photograph Bates Stamped ALH_00000041 is a true, genuine, and accurate depiction of the image displayed in the photograph.

ANSWER:

Plaintiff objects to this request to the extent it seeks information that is in the possession, custody or control of Defendant or third parties. Plaintiff further objects to this request to the extent it seeks information that is available to and equally accessible to Defendant. Plaintiff 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. Plaintiff objects to this request to the extent it seeks expert evidence. Plaintiff further objects to this request as the request is compound. Plaintiff objects to this request because the request does not have the specific document appended to the request. Subject to the foregoing specific and general objections, Plaintiff admits the photograph referred to in the request appears to be a photograph of the Defendant. Plaintiff, after a reasonable inquiry, is unable to admit or deny the photograph is a "true, genuine and accurate depiction of the image displayed in the photograph" to the extent there is a depiction of an injury or injuries in the image.

62. Please admit that the photograph Bates Stamped ALH_00000042 is a true, genuine, and accurate depiction of the image displayed in the photograph.

ANSWER:

Plaintiff objects to this request to the extent it seeks information that is in the possession, custody or control of Defendant or third parties. Plaintiff further objects to this request to the extent it seeks information that is available to and equally accessible to Defendant. Plaintiff 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. Plaintiff objects to this request to the extent it

seeks expert evidence. Plaintiff further objects to this request as the request is compound. Plaintiff objects to this request because the request does not have the specific document appended to the request. Subject to the foregoing specific and general objections, Plaintiff admits the photograph referred to in the request appears to be a photograph of the Defendant. Plaintiff, after a reasonable inquiry, is unable to admit or deny the photograph is a "true, genuine and accurate depiction of the image displayed in the photograph" to the extent there is a depiction of an injury or injuries in the image.

63. Please admit that the photograph Bates Stamped ALH_00000043 is a true, genuine, and accurate depiction of the image displayed in the photograph.

ANSWER:

Plaintiff objects to this request to the extent it seeks information that is in the possession, custody or control of Defendant or third parties. Plaintiff further objects to this request to the extent it seeks information that is available to and equally accessible to Defendant. Plaintiff 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. Plaintiff objects to this request to the extent it seeks expert evidence. Plaintiff further objects to this request as the request is compound. Plaintiff objects to this request because the request does not have the specific document appended to the request. Subject to the foregoing specific and general objections, Plaintiff admits the photograph referred to in the request appears to be a photograph of the Defendant. Plaintiff, after a reasonable inquiry, is unable to admit or deny the photograph is a "true, genuine and accurate depiction of the image displayed in the photograph" to the extent there is a depiction of an injury or injuries in the image.

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64. Please admit that the photograph Bates Stamped ALH_00000045 is a true, genuine, and accurate depiction of the image displayed in the photograph.

ANSWER:

Plaintiff objects to this request to the extent it seeks information that is in the possession, custody or control of Defendant or third parties. Plaintiff further objects to this request to the extent it seeks information that is available to and equally accessible to Defendant. Plaintiff 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. Plaintiff objects to this request to the extent it seeks expert evidence. Plaintiff further objects to this request as the request is compound. Plaintiff objects to this request because the request does not have the specific document appended to the request. Subject to the foregoing specific and general objections, Plaintiff admits the photograph referred to in the request appears to be a photograph of the Defendant. Plaintiff, after a reasonable inquiry, is unable to admit or deny the photograph is a "true, genuine and accurate depiction of the image displayed in the photograph" to the extent there is a depiction of an injury or injuries in the image.

65. Please admit that the photograph Bates Stamped ALH_00000054 is a true, genuine, and accurate depiction of the image displayed in the photograph.

ANSWER:

Plaintiff objects to this request to the extent it seeks information that is in the possession, custody or control of Defendant or third parties. Plaintiff further objects to this request to the extent it seeks information that is available to and equally accessible to Defendant. Plaintiff 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. Plaintiff objects to this request to the extent it

seeks expert evidence. Plaintiff further objects to this request as the request is compound. Plaintiff objects to this request because the request does not have the specific document appended to the request. Subject to the foregoing specific and general objections, Plaintiff admits the photograph referred to in the request appears to be a photograph of the Defendant. Plaintiff, after a reasonable inquiry, is unable to admit or deny the photograph is a "true, genuine and accurate depiction of the image displayed in the photograph" to the extent there is a depiction of an injury or injuries in the image.

66. Please admit that the photograph Bates Stamped ALH_00000055 is a true, genuine, and accurate depiction of the image displayed in the photograph.

ANSWER:

Plaintiff objects to this request to the extent it seeks information that is in the possession, custody or control of Defendant or third parties. Plaintiff further objects to this request to the extent it seeks information that is available to and equally accessible to Defendant. Plaintiff 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. Plaintiff objects to this request to the extent it seeks expert evidence. Plaintiff further objects to this request as the request is compound. Plaintiff objects to this request because the request does not have the specific document appended to the request. Subject to the foregoing specific and general objections, Plaintiff admits the photograph referred to in the request appears to be a photograph of the Defendant. Plaintiff, after a reasonable inquiry, is unable to admit or deny the photograph is a "true, genuine and accurate depiction of the image displayed in the photograph" to the extent there is a depiction of an injury or injuries in the image.

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67. Please admit that the photograph Bates Stamped ALH_00000073 is a true, genuine, and accurate depiction of the image displayed in the photograph.

ANSWER:

Plaintiff objects to this request to the extent it seeks information that is in the possession, custody or control of Defendant or third parties. Plaintiff further objects to this request to the extent it seeks information that is available to and equally accessible to Defendant. Plaintiff 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. Plaintiff objects to this request to the extent it seeks expert evidence. Plaintiff further objects to this request as the request is compound. Plaintiff objects to this request because the request does not have the specific document appended to the request. Subject to the foregoing specific and general objections, Plaintiff admits the photograph referred to in the request appears to be a photograph of the Defendant. Plaintiff, after a reasonable inquiry, is unable to admit or deny the photograph is a "true, genuine and accurate depiction of the image displayed in the photograph" to the extent there is a depiction of an injury or injuries in the image.

68. Please admit that the photograph Bates Stamped ALH_00000074 is a true, genuine, and accurate depiction of the image displayed in the photograph.

ANSWER:

Plaintiff objects to this request to the extent it seeks information that is in the possession, custody or control of Defendant or third parties. Plaintiff further objects to this request to the extent it seeks information that is available to and equally accessible to Defendant. Plaintiff 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. Plaintiff objects to this request to the extent it

seeks expert evidence. Plaintiff further objects to this request as the request is compound. Plaintiff objects to this request because the request does not have the specific document appended to the request. Subject to the foregoing specific and general objections, Plaintiff admits the photograph referred to in the request appears to be a photograph of the Defendant. Plaintiff, after a reasonable inquiry, is unable to admit or deny the photograph is a "true, genuine and accurate depiction of the image displayed in the photograph" to the extent there is a depiction of an injury or injuries in the image.

69. Please admit that the photograph Bates Stamped ALH_00000075 is a true, genuine, and accurate depiction of the image displayed in the photograph.

ANSWER:

Plaintiff objects to this request to the extent it seeks information that is in the possession, custody or control of Defendant or third parties. Plaintiff further objects to this request to the extent it seeks information that is available to and equally accessible to Defendant. Plaintiff 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. Plaintiff objects to this request to the extent it seeks expert evidence. Plaintiff further objects to this request as the request is compound. Plaintiff objects to this request because the request does not have the specific document appended to the request. Subject to the foregoing specific and general objections, Plaintiff admits the photograph referred to in the request appears to be a photograph of the Defendant. Plaintiff, after a reasonable inquiry, is unable to admit or deny the photograph is a "true, genuine and accurate depiction of the image displayed in the photograph" to the extent there is a depiction of an injury or injuries in the image.

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70. Please admit that the photograph Bates Stamped ALH_00000076 is a true, genuine, and accurate depiction of the image displayed in the photograph.

ANSWER:

Plaintiff objects to this request to the extent it seeks information that is in the possession, custody or control of Defendant or third parties. Plaintiff further objects to this request to the extent it seeks information that is available to and equally accessible to Defendant. Plaintiff 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. Plaintiff objects to this request to the extent it seeks expert evidence. Plaintiff further objects to this request as the request is compound. Plaintiff objects to this request because the request does not have the specific document appended to the request. Subject to the foregoing specific and general objections, Plaintiff admits the photograph referred to in the request appears to be a photograph of the Defendant. Plaintiff, after a reasonable inquiry, is unable to admit or deny the photograph is a "true, genuine and accurate depiction of the image displayed in the photograph" to the extent there is a depiction of an injury or injuries in the image.

71. Please admit that the photograph Bates Stamped ALH_00000077 is a true, genuine, and accurate depiction of the image displayed in the photograph.

ANSWER:

Plaintiff objects to this request to the extent it seeks information that is in the possession, custody or control of Defendant or third parties. Plaintiff further objects to this request to the extent it seeks information that is available to and equally accessible to Defendant. Plaintiff 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. Plaintiff objects to this request to the extent it

seeks expert evidence. Plaintiff further objects to this request as the request is compound. Plaintiff objects to this request because the request does not have the specific document appended to the request. Subject to the foregoing specific and general objections, Plaintiff admits the photograph referred to in the request appears to be a photograph of the Defendant. Plaintiff, after a reasonable inquiry, is unable to admit or deny the photograph is a "true, genuine and accurate depiction of the image displayed in the photograph" to the extent there is a depiction of an injury or injuries in the image.

72. Please admit that the photograph Bates Stamped ALH_00000535 is a true, genuine, and accurate depiction of the image displayed in the photograph.

ANSWER:

Plaintiff objects to this request to the extent it seeks information that is in the possession, custody or control of Defendant or third parties. Plaintiff further objects to this request to the extent it seeks information that is available to and equally accessible to Defendant. Plaintiff 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. Plaintiff objects to this request to the extent it seeks expert evidence. Plaintiff further objects to this request as the request is compound. Plaintiff objects to this request because the request does not have the specific document appended to the request. Subject to the foregoing specific and general objections, Plaintiff admits the photograph referred to in the request appears to be a photograph of the Defendant. Plaintiff, after a reasonable inquiry, is unable to admit or deny the photograph is a "true, genuine and accurate depiction of the image displayed in the photograph" to the extent there is a depiction of an injury or injuries in the image.

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73. Please admit that the photograph Bates Stamped ALH_00000046 is a true, genuine, and accurate depiction of the image displayed in the photograph.

ANSWER:

Plaintiff objects to this request to the extent it seeks information that is in the possession, custody or control of Defendant or third parties. Plaintiff further objects to this request to the extent it seeks information that is available to and equally accessible to Defendant. Plaintiff 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. Plaintiff objects to this request to the extent it seeks expert evidence. Plaintiff further objects to this request as the request is compound. Plaintiff objects to this request because the request does not have the specific document appended to the request. Subject to the foregoing specific and general objections, Plaintiff admits the photograph referred to in the request appears to be a photograph of the Defendant. Plaintiff, after a reasonable inquiry, is unable to admit or deny the photograph is a "true, genuine and accurate depiction of the image displayed in the photograph" to the extent there is a depiction of an injury or injuries in the image.

74. Please admit that the photograph Bates Stamped ALH_00000047 is a true, genuine, and accurate depiction of the image displayed in the photograph.

ANSWER:

Plaintiff objects to this request to the extent it seeks information that is in the possession, custody or control of Defendant or third parties. Plaintiff further objects to this request to the extent it seeks information that is available to and equally accessible to Defendant. Plaintiff 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. Plaintiff objects to this request to the extent it

seeks expert evidence. Plaintiff further objects to this request as the request is compound. Plaintiff objects to this request because the request does not have the specific document appended to the request. Subject to the foregoing specific and general objections, Plaintiff admits the photograph referred to in the request appears to be a photograph of the Defendant. Plaintiff, after a reasonable inquiry, is unable to admit or deny the photograph is a "true, genuine and accurate depiction of the image displayed in the photograph" to the extent there is a depiction of an injury or injuries in the image.

75. Please admit that the photograph Bates Stamped ALH_00000048 is a true, genuine, and accurate depiction of the image displayed in the photograph.

ANSWER:

Plaintiff objects to this request to the extent it seeks information that is in the possession, custody or control of Defendant or third parties. Plaintiff further objects to this request to the extent it seeks information that is available to and equally accessible to Defendant. Plaintiff 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. Plaintiff objects to this request to the extent it seeks expert evidence. Plaintiff further objects to this request as the request is compound. Plaintiff objects to this request because the request does not have the specific document appended to the request. Subject to the foregoing specific and general objections, Plaintiff admits the photograph referred to in the request appears to be a photograph of the Defendant. Plaintiff, after a reasonable inquiry, is unable to admit or deny the photograph is a "true, genuine and accurate depiction of the image displayed in the photograph" to the extent there is a depiction of an injury or injuries in the image.

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76. Please admit that the photograph Bates Stamped ALH_00000049 is a true, genuine, and accurate depiction of the image displayed in the photograph.

ANSWER:

Plaintiff objects to this request to the extent it seeks information that is in the possession, custody or control of Defendant or third parties. Plaintiff further objects to this request to the extent it seeks information that is available to and equally accessible to Defendant. Plaintiff 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. Plaintiff objects to this request to the extent it seeks expert evidence. Plaintiff further objects to this request as the request is compound. Plaintiff objects to this request because the request does not have the specific document appended to the request. Subject to the foregoing specific and general objections, Plaintiff admits the photograph referred to in the request appears to be a photograph of the Defendant. Plaintiff, after a reasonable inquiry, is unable to admit or deny the photograph is a "true, genuine and accurate depiction of the image displayed in the photograph" to the extent there is a depiction of an injury or injuries in the image.

77. Please admit that the photograph Bates Stamped ALH_00000078 is a true, genuine, and accurate depiction of the image displayed in the photograph.

ANSWER:

Plaintiff objects to this request to the extent it seeks information that is in the possession, custody or control of Defendant or third parties. Plaintiff further objects to this request to the extent it seeks information that is available to and equally accessible to Defendant. Plaintiff 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. Plaintiff objects to this request to the extent it

seeks expert evidence. Plaintiff further objects to this request as the request is compound. Plaintiff objects to this request because the request does not have the specific document appended to the request. Subject to the foregoing specific and general objections, Plaintiff admits the photograph referred to in the request appears to be a photograph of the Defendant. Plaintiff, after a reasonable inquiry, is unable to admit or deny the photograph is a "true, genuine and accurate depiction of the image displayed in the photograph" to the extent there is a depiction of an injury or injuries in the image.

78. Please admit that the photograph Bates Stamped ALH_00000079 is a true, genuine, and accurate depiction of the image displayed in the photograph.

ANSWER:

Plaintiff objects to this request to the extent it seeks information that is in the possession, custody or control of Defendant or third parties. Plaintiff further objects to this request to the extent it seeks information that is available to and equally accessible to Defendant. Plaintiff 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. Plaintiff objects to this request to the extent it seeks expert evidence. Plaintiff further objects to this request as the request is compound. Plaintiff objects to this request because the request does not have the specific document appended to the request. Subject to the foregoing specific and general objections, Plaintiff admits the photograph referred to in the request appears to be a photograph of the Defendant. Plaintiff, after a reasonable inquiry, is unable to admit or deny the photograph is a "true, genuine and accurate depiction of the image displayed in the photograph" to the extent there is a depiction of an injury or injuries in the image.

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79. Please admit that the photograph Bates Stamped ALH_00000080 is a true, genuine, and accurate depiction of the image displayed in the photograph.

ANSWER:

Plaintiff objects to this request to the extent it seeks information that is in the possession, custody or control of Defendant or third parties. Plaintiff further objects to this request to the extent it seeks information that is available to and equally accessible to Defendant. Plaintiff 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. Plaintiff objects to this request to the extent it seeks expert evidence. Plaintiff further objects to this request as the request is compound. Plaintiff objects to this request because the request does not have the specific document appended to the request. Subject to the foregoing specific and general objections, Plaintiff admits the photograph referred to in the request appears to be a photograph of the Defendant. Plaintiff, after a reasonable inquiry, is unable to admit or deny the photograph is a "true, genuine and accurate depiction of the image displayed in the photograph" to the extent there is a depiction of an injury or injuries in the image.

80. Please admit that the photograph Bates Stamped ALH_00000081 is a true, genuine, and accurate depiction of the image displayed in the photograph.

ANSWER:

Plaintiff objects to this request to the extent it seeks information that is in the possession, custody or control of Defendant or third parties. Plaintiff further objects to this request to the extent it seeks information that is available to and equally accessible to Defendant. Plaintiff 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. Plaintiff objects to this request to the extent it

seeks expert evidence. Plaintiff further objects to this request as the request is compound. Plaintiff objects to this request because the request does not have the specific document appended to the request. Subject to the foregoing specific and general objections, Plaintiff admits the photograph referred to in the request appears to be a photograph of the Defendant. Plaintiff, after a reasonable inquiry, is unable to admit or deny the photograph is a "true, genuine and accurate depiction of the image displayed in the photograph" to the extent there is a depiction of an injury or injuries in the image.

81. Please admit that the photograph Bates Stamped ALH_00000082 is a true, genuine, and accurate depiction of the image displayed in the photograph.

ANSWER:

Plaintiff objects to this request to the extent it seeks information that is in the possession, custody or control of Defendant or third parties. Plaintiff further objects to this request to the extent it seeks information that is available to and equally accessible to Defendant. Plaintiff 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. Plaintiff objects to this request to the extent it seeks expert evidence. Plaintiff further objects to this request as the request is compound. Plaintiff objects to this request because the request does not have the specific document appended to the request. Subject to the foregoing specific and general objections, Plaintiff admits the photograph referred to in the request appears to be a photograph of the Defendant. Plaintiff, after a reasonable inquiry, is unable to admit or deny the photograph is a "true, genuine and accurate depiction of the image displayed in the photograph" to the extent there is a depiction of an injury or injuries in the image.

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82. Please admit that the photograph Bates Stamped ALH_00000083 is a true, genuine, and accurate depiction of the image displayed in the photograph.

ANSWER:

Plaintiff objects to this request to the extent it seeks information that is in the possession, custody or control of Defendant or third parties. Plaintiff further objects to this request to the extent it seeks information that is available to and equally accessible to Defendant. Plaintiff 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. Plaintiff objects to this request to the extent it seeks expert evidence. Plaintiff further objects to this request as the request is compound. Plaintiff objects to this request because the request does not have the specific document appended to the request. Subject to the foregoing specific and general objections, Plaintiff admits the photograph referred to in the request appears to be a photograph of the Defendant. Plaintiff, after a reasonable inquiry, is unable to admit or deny the photograph is a "true, genuine and accurate depiction of the image displayed in the photograph" to the extent there is a depiction of an injury or injuries in the image.

83. Please admit that the photograph Bates Stamped ALH_00000084 is a true, genuine, and accurate depiction of the image displayed in the photograph.

ANSWER:

Plaintiff objects to this request to the extent it seeks information that is in the possession, custody or control of Defendant or third parties. Plaintiff further objects to this request to the extent it seeks information that is available to and equally accessible to Defendant. Plaintiff 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. Plaintiff objects to this request to the extent it

seeks expert evidence. Plaintiff further objects to this request as the request is compound. Plaintiff objects to this request because the request does not have the specific document appended to the request. Subject to the foregoing specific and general objections, Plaintiff admits the photograph referred to in the request appears to be a photograph of the Defendant. Plaintiff, after a reasonable inquiry, is unable to admit or deny the photograph is a "true, genuine and accurate depiction of the image displayed in the photograph" to the extent there is a depiction of an injury or injuries in the image.

84. Please admit that the photograph Bates Stamped ALH_00000031 is a true, genuine, and accurate depiction of the image displayed in the photograph.

ANSWER:

Plaintiff objects to this request to the extent it seeks information that is in the possession, custody or control of Defendant or third parties. Plaintiff further objects to this request to the extent it seeks information that is available to and equally accessible to Defendant. Plaintiff 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. Plaintiff objects to this request to the extent it seeks expert evidence. Plaintiff further objects to this request as the request is compound. Plaintiff objects to this request because the request does not have the specific document appended to the request. Subject to the foregoing specific and general objections, Plaintiff admits the photograph referred to in the request appears to be a photograph of legs. Plaintiff, after a reasonable inquiry, is unable to admit or deny the photograph is a "true, genuine and accurate depiction of the image displayed in the photograph" to the extent there is a depiction of an injury or injuries in the image.

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85. Please admit that the photograph Bates Stamped ALH_00000033 is a true, genuine, and accurate depiction of the image displayed in the photograph.

ANSWER:

Plaintiff objects to this request to the extent it seeks information that is in the possession, custody or control of Defendant or third parties. Plaintiff further objects to this request to the extent it seeks information that is available to and equally accessible to Defendant. Plaintiff 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. Plaintiff objects to this request to the extent it seeks expert evidence. Plaintiff further objects to this request as the request is compound. Plaintiff objects to this request because the request does not have the specific document appended to the request. Subject to the foregoing specific and general objections, Plaintiff admits the photograph referred to in the request appears to be a photograph of legs. Plaintiff, after a reasonable inquiry, is unable to admit or deny the photograph is a "true, genuine and accurate depiction of the image displayed in the photograph" to the extent there is a depiction of an injury or injuries in the image.

86. Please admit that the photograph Bates Stamped ALH_00007023 is a true, genuine, and accurate depiction of the image displayed in the photograph.

ANSWER:

Plaintiff objects to this request as the request is compound. Plaintiff objects to this request because the request does not have the specific document appended to the request. Subject to the foregoing specific and general objections, Plaintiff responds: admit.

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99. Please admit that the photograph Bates Stamped ALH_00007036 is a true, genuine, and accurate depiction of the image displayed in the photograph.

ANSWER:

Plaintiff objects to this request as the request is compound. Plaintiff objects to this request because the request does not have the specific document appended to the request. Subject to the foregoing specific and general objections, Plaintiff responds: admit.

100. Please admit that the photograph Bates Stamped ALH_00007037 is a true, genuine, and accurate depiction of the image displayed in the photograph.

ANSWER:

Plaintiff objects to this request as the request is compound. Plaintiff objects to this request because the request does not have the specific document appended to the request. Subject to the foregoing specific and general objections, Plaintiff responds: admit.

101. Please admit that the photograph Bates Stamped ALH_00007038 is a true, genuine, and accurate depiction of the image displayed in the photograph.

ANSWER:

Plaintiff objects to this request as the request is compound. Plaintiff objects to this request because the request does not have the specific document appended to the request. Subject to the foregoing specific and general objections, Plaintiff responds: admit.

102. Please admit that the photograph Bates Stamped ALH_00007039 is a true, genuine, and accurate depiction of the image displayed in the photograph.

ANSWER:

Plaintiff objects to this request to the extent it seeks information that is in the possession, custody or control of Defendant or third parties. Plaintiff further objects to this request to the extent it seeks information that is available to and equally accessible to Defendant. Plaintiff 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. Plaintiff objects to this request to the extent it seeks expert evidence. Plaintiff further objects to this request as the request is compound. Plaintiff objects to this request because the request does not have the specific document appended to the request. Subject to the foregoing specific and general objections, Plaintiff admits the photograph referred to in the request appears to be a photograph of the Defendant. Plaintiff, after a reasonable inquiry, is unable to admit or deny the photograph is a "true, genuine and accurate depiction of the image displayed in the photograph" to the extent there is a depiction of an injury or injuries in the image.

103. Please admit that the photograph Bates Stamped ALH_00007040 is a true, genuine, and accurate depiction of the image displayed in the photograph.

ANSWER:

Plaintiff objects to this request as the request is compound. Plaintiff objects to this request because the request does not have the specific document appended to the request. Subject to the foregoing specific and general objections, Plaintiff responds: admit.

104. Please admit that the photograph Bates Stamped ALH_00007041 is a true, genuine, and accurate depiction of the image displayed in the photograph.

ANSWER:

Plaintiff objects to this request as the request is compound. Plaintiff objects to this request because the request does not have the specific document appended to the request. Subject to the foregoing specific and general objections, Plaintiff responds: admit.

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105. Please admit that the photograph Bates Stamped ALH_00007042 is a true, genuine, and accurate depiction of the image displayed in the photograph.

ANSWER:

Plaintiff objects to this request as the request is compound. Plaintiff objects to this request because the request does not have the specific document appended to the request. Subject to the foregoing specific and general objections, Plaintiff responds: admit.

106. Please admit that the photograph Bates Stamped ALH_00007043 is a true, genuine, and accurate depiction of the image displayed in the photograph.

ANSWER:

Plaintiff objects to this request to the extent it seeks information that is in the possession, custody or control of Defendant or third parties. Plaintiff further objects to this request to the extent it seeks information that is available to and equally accessible to Defendant. Plaintiff 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. Plaintiff objects to this request to the extent it seeks expert evidence. Plaintiff further objects to this request as the request is compound. Plaintiff objects to this request because the request does not have the specific document appended to the request. Subject to the foregoing specific and general objections, Plaintiff admits the photograph referred to in the request appears to be a photograph of the Defendant. Plaintiff, after a reasonable inquiry, is unable to admit or deny the photograph is a "true, genuine and accurate depiction of the image displayed in the photograph" to the extent there is a depiction of an injury or injuries in the image.

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111. Please admit that the photograph Bates Stamped ALH_00007048 is a true, genuine, and accurate depiction of the image displayed in the photograph.

ANSWER:

Plaintiff objects to this request as the request is compound. Plaintiff objects to this request because the request does not have the specific document appended to the request. Subject to the foregoing specific and general objections, Plaintiff responds: admit.

112. Please admit that the photograph Bates Stamped ALH_00007049 is a true, genuine, and accurate depiction of the image displayed in the photograph.

ANSWER:

Plaintiff objects to this request as the request is compound. Plaintiff objects to this request because the request does not have the specific document appended to the request. Subject to the foregoing specific and general objections, Plaintiff responds: admit.

113. Please admit that the photograph Bates Stamped ALH_00007050 is a true, genuine, and accurate depiction of the image displayed in the photograph.

ANSWER:

Plaintiff objects to this request as the request is compound. Plaintiff objects to this request because the request does not have the specific document appended to the request. Subject to the foregoing specific and general objections, Plaintiff responds: admit.

114. Please admit that the photograph Bates Stamped ALH_00007051 is a true, genuine, and accurate depiction of the image displayed in the photograph.

ANSWER:

Plaintiff objects to this request to the extent it seeks information that is in the possession, custody or control of Defendant or third parties. Plaintiff further objects to this request to the extent it seeks information that is available to and equally accessible to Defendant. Plaintiff 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. Plaintiff objects to this request to the extent it seeks expert evidence. Plaintiff further objects to this request as the request is compound. Plaintiff objects to this request because the request does not have the specific document appended to the request. Subject to the foregoing specific and general objections, Plaintiff, after a reasonable inquiry, is unable to admit or deny the photograph is a "true, genuine and accurate depiction of the image displayed in the photograph" to the extent the image purports to depict metadata of the photograph.

115. Please admit that the photograph Bates Stamped ALH_00007052 is a true, genuine, and accurate depiction of the image displayed in the photograph.

ANSWER:

Plaintiff objects to this request to the extent it seeks information that is in the possession, custody or control of Defendant or third parties. Plaintiff further objects to this request to the extent it seeks information that is available to and equally accessible to Defendant. Plaintiff 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. Plaintiff objects to this request to the extent it seeks expert evidence. Plaintiff further objects to this request as the request is compound. Plaintiff objects to this request because the request does not have the specific document appended to the request. Subject to the foregoing specific and general objections, Plaintiff, after a reasonable inquiry, is unable to admit or deny the photograph is a "true, genuine and accurate depiction of the image displayed in the photograph" to the extent the image purports to depict metadata of the photograph.

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116. Please admit that the photograph Bates Stamped ALH_00007053 is a true, genuine, and accurate depiction of the image displayed in the photograph.

ANSWER:

Plaintiff objects to this request to the extent it seeks information that is in the possession, custody or control of Defendant or third parties. Plaintiff further objects to this request to the extent it seeks information that is available to and equally accessible to Defendant. Plaintiff 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. Plaintiff objects to this request to the extent it seeks expert evidence. Plaintiff further objects to this request as the request is compound. Plaintiff objects to this request because the request does not have the specific document appended to the request. Subject to the foregoing specific and general objections, Plaintiff, after a reasonable inquiry, is unable to admit or deny the photograph is a "true, genuine and accurate depiction of the image displayed in the photograph" to the extent the image purports to depict metadata of the photograph.

117. Please admit that the photograph Bates Stamped ALH_00007054 is a true, genuine, and accurate depiction of the image displayed in the photograph.

ANSWER:

Plaintiff objects to this request to the extent it seeks information that is in the possession, custody or control of Defendant or third parties. Plaintiff further objects to this request to the extent it seeks information that is available to and equally accessible to Defendant. Plaintiff 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. Plaintiff objects to this request to the extent it seeks expert evidence. Plaintiff further objects to this request as the request is compound.

Plaintiff objects to this request because the request does not have the specific document appended to the request. Subject to the foregoing specific and general objections, Plaintiff, after a reasonable inquiry, is unable to admit or deny the photograph is a "true, genuine and accurate depiction of the image displayed in the photograph" to the extent the image purports to depict metadata of the photograph.

118. Please admit that the photograph Bates Stamped ALH_00007055 is a true, genuine, and accurate depiction of the image displayed in the photograph.

ANSWER:

Plaintiff objects to this request to the extent it seeks information that is in the possession, custody or control of Defendant or third parties. Plaintiff further objects to this request to the extent it seeks information that is available to and equally accessible to Defendant. Plaintiff 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. Plaintiff objects to this request to the extent it seeks expert evidence. Plaintiff further objects to this request as the request is compound. Plaintiff objects to this request because the request does not have the specific document appended to the request. Subject to the foregoing specific and general objections, Plaintiff, after a reasonable inquiry, is unable to admit or deny the photograph is a "true, genuine and accurate depiction of the image displayed in the photograph" to the extent the image purports to depict metadata of the photograph.

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119. Please admit that the photograph Bates Stamped ALH_00007056 is a true, genuine, and accurate depiction of the image displayed in the photograph.

ANSWER:

Plaintiff objects to this request as the request is compound. Plaintiff objects to this request because the request does not have the specific document appended to the request. Subject to the foregoing specific and general objections, Plaintiff responds: admit.

120. Please admit that the photograph Bates Stamped ALH_00007057 is a true, genuine, and accurate depiction of the image displayed in the photograph.

ANSWER:

Plaintiff objects to this request as the request is compound. Plaintiff objects to this request because the request does not have the specific document appended to the request. Subject to the foregoing specific and general objections, Plaintiff responds: admit.

121. Please admit that the photograph Bates Stamped ALH_00007058 is a true, genuine, and accurate depiction of the image displayed in the photograph.

ANSWER:

Plaintiff objects to this request as the request is compound. Plaintiff objects to this request because the request does not have the specific document appended to the request. Subject to the foregoing specific and general objections, Plaintiff responds: admit.

122. Please admit that the photograph Bates Stamped ALH_00007060 is a true, genuine, and accurate depiction of the image displayed in the photograph.

ANSWER:

Plaintiff objects to this request to the extent it seeks information that is in the possession, custody or control of Defendant or third parties. Plaintiff further objects to this request to the extent it seeks information that is available to and equally accessible to Defendant. Plaintiff 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. Plaintiff objects to this request to the extent it seeks expert evidence. Plaintiff further objects to this request as the request is compound. Plaintiff objects to this request because the request does not have the specific document appended to the request. Subject to the foregoing specific and general objections, Plaintiff, after a reasonable inquiry, is unable to admit or deny the photograph is a "true, genuine and accurate depiction of the image displayed in the photograph" to the extent the image purports to depict metadata of the photograph.

123. Please admit that the photograph Bates Stamped ALH_00007061 is a true, genuine, and accurate depiction of the image displayed in the photograph.

ANSWER:

Plaintiff objects to this request to the extent it seeks information that is in the possession, custody or control of Defendant or third parties. Plaintiff further objects to this request to the extent it seeks information that is available to and equally accessible to Defendant. Plaintiff 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. Plaintiff objects to this request to the extent it seeks expert evidence. Plaintiff further objects to this request as the request is compound. Plaintiff objects to this request because the request does not have the specific document appended to the request. Subject to the foregoing specific and general objections, Plaintiff, after a reasonable inquiry, is unable to admit or deny the photograph is a "true, genuine and accurate depiction of the image displayed in the photograph" to the extent the image purports to depict metadata of the photograph.

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124. Please admit that the photograph Bates Stamped ALH_00007062 is a true, genuine, and accurate depiction of the image displayed in the photograph.

ANSWER:

Plaintiff objects to this request to the extent it seeks information that is in the possession, custody or control of Defendant or third parties. Plaintiff further objects to this request to the extent it seeks information that is available to and equally accessible to Defendant. Plaintiff 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. Plaintiff objects to this request to the extent it seeks expert evidence. Plaintiff further objects to this request as the request is compound. Plaintiff objects to this request because the request does not have the specific document appended to the request. Subject to the foregoing specific and general objections, Plaintiff, after a reasonable inquiry, is unable to admit or deny the photograph is a "true, genuine and accurate depiction of the image displayed in the photograph" to the extent the image purports to depict metadata of the photograph.

125. Please admit that the photograph Bates Stamped ALH_00007063 is a true, genuine, and accurate depiction of the image displayed in the photograph.

ANSWER:

Plaintiff objects to this request as the request is compound. Plaintiff objects to this request because the request does not have the specific document appended to the request. Subject to the foregoing specific and general objections, Plaintiff responds: admit.

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126. Please admit that the photograph Bates Stamped ALH_00007064 is a true, genuine, and accurate depiction of the image displayed in the photograph.

ANSWER:

Plaintiff objects to this request as the request is compound. Plaintiff objects to this request because the request does not have the specific document appended to the request. Subject to the foregoing specific and general objections, Plaintiff responds: admit.

127. Please admit that the photograph Bates Stamped ALH_00007065 is a true, genuine, and accurate depiction of the image displayed in the photograph.

ANSWER:

Plaintiff objects to this request as the request is compound. Plaintiff objects to this request because the request does not have the specific document appended to the request. Subject to the foregoing specific and general objections, Plaintiff responds: admit.

128. Please admit that the photograph Bates Stamped ALH_00007066 is a true, genuine, and accurate depiction of the image displayed in the photograph.

ANSWER:

Plaintiff objects to this request to the extent it seeks information that is in the possession, custody or control of Defendant or third parties. Plaintiff further objects to this request to the extent it seeks information that is available to and equally accessible to Defendant. Plaintiff 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. Plaintiff objects to this request to the extent it seeks expert evidence. Plaintiff further objects to this request as the request is compound. Plaintiff objects to this request because the request does not have the specific document appended to the request. Subject to the foregoing specific and general objections, Plaintiff admits the photograph referred to in the request appears to be a photograph of the Defendant. Plaintiff,

after a reasonable inquiry, is unable to admit or deny the photograph is a "true, genuine and accurate depiction of the image displayed in the photograph" to the extent there is a depiction of an injury or injuries in the image.

129. Please admit that the photograph Bates Stamped ALH_00007067 is a true, genuine, and accurate depiction of the image displayed in the photograph.

ANSWER:

Plaintiff objects to this request as the request is compound. Plaintiff objects to this request because the request does not have the specific document appended to the request. Subject to the foregoing specific and general objections, Plaintiff responds: admit.

130. Please admit that the photograph Bates Stamped ALH_00007068 is a true, genuine, and accurate depiction of the image displayed in the photograph.

ANSWER:

Plaintiff objects to this request to the extent it seeks information that is in the possession, custody or control of Defendant or third parties. Plaintiff further objects to this request to the extent it seeks information that is available to and equally accessible to Defendant. Plaintiff 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. Plaintiff objects to this request to the extent it seeks expert evidence. Plaintiff further objects to this request as the request is compound. Plaintiff objects to this request because the request does not have the specific document appended to the request. Subject to the foregoing specific and general objections, Plaintiff admits the photograph referred to in the request appears to be a photograph of the Defendant. Plaintiff, after a reasonable inquiry, is unable to admit or deny the photograph is a "true, genuine and accurate depiction of the image displayed in the photograph" to the extent there is a depiction of an injury or injuries in the image.

131. Please admit that the photograph Bates Stamped ALH_00007069 is a true, genuine, and accurate depiction of the image displayed in the photograph.

ANSWER:

Plaintiff objects to this request as the request is compound. Plaintiff objects to this request because the request does not have the specific document appended to the request. Subject to the foregoing specific and general objections, Plaintiff responds: admit.

132. Please admit that the photograph Bates Stamped ALH_00007070 is a true, genuine, and accurate depiction of the image displayed in the photograph.

ANSWER:

Plaintiff objects to this request as the request is compound. Plaintiff objects to this request because the request does not have the specific document appended to the request. Subject to the foregoing specific and general objections, Plaintiff responds: admit.

133. Please admit that the photograph Bates Stamped ALH_00007071 is a true, genuine, and accurate depiction of the image displayed in the photograph.

ANSWER:

Plaintiff objects to this request as the request is compound. Plaintiff objects to this request because the request does not have the specific document appended to the request. Subject to the foregoing specific and general objections, Plaintiff responds: admit.

134. Please admit that the photograph Bates Stamped ALH_00007072 is a true, genuine, and accurate depiction of the image displayed in the photograph.

ANSWER:

Plaintiff objects to this request to the extent it seeks information that is in the possession, custody or control of Defendant or third parties. Plaintiff further objects to this request to the extent it seeks information that is available to and equally accessible to Defendant. Plaintiff 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. Plaintiff objects to this request to the extent it seeks expert evidence. Plaintiff further objects to this request as the request is compound. Plaintiff objects to this request because the request does not have the specific document appended to the request. Subject to the foregoing specific and general objections, Plaintiff, after a reasonable inquiry, is unable to admit or deny the photograph is a "true, genuine and accurate depiction of the image displayed in the photograph" to the extent the image purports to depict metadata of the photograph.

135. Please admit that the photograph Bates Stamped ALH_00007073 is a true, genuine, and accurate depiction of the image displayed in the photograph.

ANSWER:

Plaintiff objects to this request as the request is compound. Plaintiff objects to this request because the request does not have the specific document appended to the request. Subject to the foregoing specific and general objections, Plaintiff responds: admit.

136. Please admit that the photograph Bates Stamped ALH_00007074 is a true, genuine, and accurate depiction of the image displayed in the photograph.

ANSWER:

Plaintiff objects to this request as the request is compound. Plaintiff objects to this request because the request does not have the specific document appended to the request. Subject to the foregoing specific and general objections, Plaintiff responds: admit.

137. Please admit that the photograph Bates Stamped ALH_00007075 is a true, genuine, and accurate depiction of the image displayed in the photograph.

ANSWER:

Plaintiff objects to this request to the extent it seeks information that is in the possession, custody or control of Defendant or third parties. Plaintiff further objects to this request to the extent it seeks information that is available to and equally accessible to Defendant. Plaintiff

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. Plaintiff objects to this request to the extent it seeks expert evidence. Plaintiff further objects to this request as the request is compound. Plaintiff objects to this request because the request does not have the specific document appended to the request. Subject to the foregoing specific and general objections, Plaintiff admits the photograph referred to in the request appears to be a photograph of the Defendant. Plaintiff, after a reasonable inquiry, is unable to admit or deny the photograph is a "true, genuine and accurate depiction of the image displayed in the photograph" to the extent there is a depiction of an injury or injuries in the image.

138. Please admit that the photograph Bates Stamped ALH_00007076 is a true, genuine, and accurate depiction of the image displayed in the photograph.

ANSWER:

Plaintiff objects to this request to the extent it seeks information that is in the possession, custody or control of Defendant or third parties. Plaintiff further objects to this request to the extent it seeks information that is available to and equally accessible to Defendant. Plaintiff 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. Plaintiff objects to this request to the extent it seeks expert evidence. Plaintiff further objects to this request as the request is compound. Plaintiff objects to this request because the request does not have the specific document appended to the request. Subject to the foregoing specific and general objections, Plaintiff admits the photograph referred to in the request appears to be a photograph of the Defendant. Plaintiff, after a reasonable inquiry, is unable to admit or deny the photograph is a "true, genuine and

accurate depiction of the image displayed in the photograph" to the extent there is a depiction of an injury or injuries in the image.

139. Please admit that the photograph Bates Stamped ALH_00007077 is a true, genuine, and accurate depiction of the image displayed in the photograph.

ANSWER:

Plaintiff objects to this request to the extent it seeks information that is in the possession, custody or control of Defendant or third parties. Plaintiff further objects to this request to the extent it seeks information that is available to and equally accessible to Defendant. Plaintiff 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. Plaintiff objects to this request to the extent it seeks expert evidence. Plaintiff further objects to this request as the request is compound. Plaintiff objects to this request because the request does not have the specific document appended to the request. Subject to the foregoing specific and general objections, Plaintiff admits the photograph referred to in the request appears to be a photograph of the Defendant. Plaintiff, after a reasonable inquiry, is unable to admit or deny the photograph is a "true, genuine and accurate depiction of the image displayed in the photograph" to the extent there is a depiction of an injury or injuries in the image and the image purports to depict metadata of the photograph.

140. Please admit that the photograph Bates Stamped ALH_00007078 is a true, genuine, and accurate depiction of the image displayed in the photograph.

ANSWER:

Plaintiff objects to this request to the extent it seeks information that is in the possession, custody or control of Defendant or third parties. Plaintiff further objects to this request to the extent it seeks information that is available to and equally accessible to Defendant. Plaintiff 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. Plaintiff objects to this request to the extent it seeks expert evidence. Plaintiff further objects to this request as the request is compound. Plaintiff objects to this request because the request does not have the specific document appended to the request. Subject to the foregoing specific and general objections, Plaintiff admits the photograph referred to in the request appears to be a photograph of the Defendant. Plaintiff, after a reasonable inquiry, is unable to admit or deny the photograph is a "true, genuine and accurate depiction of the image displayed in the photograph" to the extent there is a depiction of an injury or injuries in the image and the image purports to depict metadata of the photograph.

141. Please admit that the photograph Bates Stamped ALH_00007079 is a true, genuine, and accurate depiction of the image displayed in the photograph.

ANSWER:

Plaintiff objects to this request to the extent it seeks information that is in the possession, custody or control of Defendant or third parties. Plaintiff further objects to this request to the extent it seeks information that is available to and equally accessible to Defendant. Plaintiff 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. Plaintiff objects to this request to the extent it seeks expert evidence. Plaintiff further objects to this request as the request is compound. Plaintiff objects to this request because the request does not have the specific document appended to the request. Subject to the foregoing specific and general objections, Plaintiff admits the photograph referred to in the request appears to be a photograph of the Defendant. Plaintiff, after a reasonable inquiry, is unable to admit or deny the photograph is a "true, genuine and

accurate depiction of the image displayed in the photograph" to the extent there is a depiction of an injury or injuries in the image and the image purports to depict metadata of the photograph.

142. Please admit that the photograph Bates Stamped ALH_00007080 is a true, genuine, and accurate depiction of the image displayed in the photograph.

ANSWER:

Plaintiff objects to this request to the extent it seeks information that is in the possession, custody or control of Defendant or third parties. Plaintiff further objects to this request to the extent it seeks information that is available to and equally accessible to Defendant. Plaintiff 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. Plaintiff objects to this request to the extent it seeks expert evidence. Plaintiff further objects to this request as the request is compound. Plaintiff objects to this request because the request does not have the specific document appended to the request. Subject to the foregoing specific and general objections, Plaintiff admits the photograph referred to in the request appears to be a photograph of the Defendant. Plaintiff, after a reasonable inquiry, is unable to admit or deny the photograph is a "true, genuine and accurate depiction of the image displayed in the photograph" to the extent there is a depiction of an injury or injuries in the image and the image purports to depict metadata of the photograph.

143. Please admit that the photograph Bates Stamped ALH_00007081 is a true, genuine, and accurate depiction of the image displayed in the photograph.

ANSWER:

Plaintiff objects to this request to the extent it seeks information that is in the possession, custody or control of Defendant or third parties. Plaintiff further objects to this request to the extent it seeks information that is available to and equally accessible to Defendant. Plaintiff 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. Plaintiff objects to this request to the extent it seeks expert evidence. Plaintiff further objects to this request as the request is compound. Plaintiff objects to this request because the request does not have the specific document appended to the request. Subject to the foregoing specific and general objections, Plaintiff admits the photograph referred to in the request appears to be a photograph of the Defendant. Plaintiff, after a reasonable inquiry, is unable to admit or deny the photograph is a "true, genuine and accurate depiction of the image displayed in the photograph" to the extent there is a depiction of an injury or injuries in the image and the image purports to depict metadata of the photograph.

144. Please admit that the photograph Bates Stamped ALH_00007082 is a true, genuine, and accurate depiction of the image displayed in the photograph.

ANSWER:

Plaintiff objects to this request to the extent it seeks information that is in the possession, custody or control of Defendant or third parties. Plaintiff further objects to this request to the extent it seeks information that is available to and equally accessible to Defendant. Plaintiff 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. Plaintiff objects to this request to the extent it seeks expert evidence. Plaintiff further objects to this request as the request is compound. Plaintiff objects to this request because the request does not have the specific document appended to the request. Subject to the foregoing specific and general objections, Plaintiff admits the photograph referred to in the request appears to be a photograph of the Defendant. Plaintiff, after a reasonable inquiry, is unable to admit or deny the photograph is a "true, genuine and

accurate depiction of the image displayed in the photograph" to the extent there is a depiction of an injury or injuries in the image and the image purports to depict metadata of the photograph.

145. Please admit that the photograph Bates Stamped ALH_00007083 is a true, genuine, and accurate depiction of the image displayed in the photograph.

ANSWER:

Plaintiff objects to this request to the extent it seeks information that is in the possession, custody or control of Defendant or third parties. Plaintiff further objects to this request to the extent it seeks information that is available to and equally accessible to Defendant. Plaintiff 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. Plaintiff objects to this request to the extent it seeks expert evidence. Plaintiff further objects to this request as the request is compound. Plaintiff objects to this request because the request does not have the specific document appended to the request. Subject to the foregoing specific and general objections, Plaintiff admits the photograph referred to in the request appears to be a photograph of the Defendant. Plaintiff, after a reasonable inquiry, is unable to admit or deny the photograph is a "true, genuine and accurate depiction of the image displayed in the photograph" to the extent there is a depiction of an injury or injuries in the image and the image purports to depict metadata of the photograph.

146. Please admit that the photograph Bates Stamped ALH_00007084 is a true, genuine, and accurate depiction of the image displayed in the photograph.

ANSWER:

Plaintiff objects to this request to the extent it seeks information that is in the possession, custody or control of Defendant or third parties. Plaintiff further objects to this request to the extent it seeks information that is available to and equally accessible to Defendant. Plaintiff 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. Plaintiff objects to this request to the extent it seeks expert evidence. Plaintiff further objects to this request as the request is compound. Plaintiff objects to this request because the request does not have the specific document appended to the request. Subject to the foregoing specific and general objections, Plaintiff admits the photograph referred to in the request appears to be a photograph of the Defendant. Plaintiff, after a reasonable inquiry, is unable to admit or deny the photograph is a "true, genuine and accurate depiction of the image displayed in the photograph" to the extent there is a depiction of an injury or injuries in the image and the image purports to depict metadata of the photograph.

147. Please admit that the photograph Bates Stamped ALH_00007085 is a true, genuine, and accurate depiction of the image displayed in the photograph.

ANSWER:

Plaintiff objects to this request to the extent it seeks information that is in the possession, custody or control of Defendant or third parties. Plaintiff further objects to this request to the extent it seeks information that is available to and equally accessible to Defendant. Plaintiff 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. Plaintiff objects to this request to the extent it seeks expert evidence. Plaintiff further objects to this request as the request is compound. Plaintiff objects to this request because the request does not have the specific document appended to the request. Subject to the foregoing specific and general objections, Plaintiff, after a reasonable inquiry, is unable to admit or deny the photograph is a "true, genuine and accurate depiction of the image displayed in the photograph" to the extent the image purports to depict metadata of the photograph.

148. Please admit that the photograph Bates Stamped ALH_00007086 is a true, genuine, and accurate depiction of the image displayed in the photograph.

ANSWER:

Plaintiff objects to this request to the extent it seeks information that is in the possession, custody or control of Defendant or third parties. Plaintiff further objects to this request to the extent it seeks information that is available to and equally accessible to Defendant. Plaintiff 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. Plaintiff objects to this request to the extent it seeks expert evidence. Plaintiff further objects to this request as the request is compound. Plaintiff objects to this request because the request does not have the specific document appended to the request. Subject to the foregoing specific and general objections, Plaintiff, after a reasonable inquiry, is unable to admit or deny the photograph is a "true, genuine and accurate depiction of the image displayed in the photograph" to the extent the image purports to depict metadata of the photograph.

149. Please admit that the photograph Bates Stamped ALH_00007087 is a true, genuine, and accurate depiction of the image displayed in the photograph.

ANSWER:

Plaintiff objects to this request to the extent it seeks information that is in the possession, custody or control of Defendant or third parties. Plaintiff further objects to this request to the extent it seeks information that is available to and equally accessible to Defendant. Plaintiff 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. Plaintiff objects to this request to the extent it seeks expert evidence. Plaintiff further objects to this request as the request is compound.

Plaintiff objects to this request because the request does not have the specific document appended to the request. Subject to the foregoing specific and general objections, Plaintiff, after a reasonable inquiry, is unable to admit or deny the photograph is a "true, genuine and accurate depiction of the image displayed in the photograph" to the extent the image purports to depict metadata of the photograph.

150. Please admit that the photograph Bates Stamped ALH_00007088 is a true, genuine, and accurate depiction of the image displayed in the photograph.

ANSWER:

Plaintiff objects to this request to the extent it seeks information that is in the possession, custody or control of Defendant or third parties. Plaintiff further objects to this request to the extent it seeks information that is available to and equally accessible to Defendant. Plaintiff 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. Plaintiff objects to this request to the extent it seeks expert evidence. Plaintiff further objects to this request as the request is compound. Plaintiff objects to this request because the request does not have the specific document appended to the request. Subject to the foregoing specific and general objections, Plaintiff, after a reasonable inquiry, is unable to admit or deny the photograph is a "true, genuine and accurate depiction of the image displayed in the photograph" to the extent the image purports to depict metadata of the photograph.

151. Please admit that the photograph Bates Stamped ALH_00007089 is a true, genuine, and accurate depiction of the image displayed in the photograph.

ANSWER:

Plaintiff objects to this request to the extent it seeks information that is in the possession, custody or control of Defendant or third parties. Plaintiff further objects to this request to the

extent it seeks information that is available to and equally accessible to Defendant. Plaintiff 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. Plaintiff objects to this request to the extent it seeks expert evidence. Plaintiff further objects to this request as the request is compound. Plaintiff objects to this request because the request does not have the specific document appended to the request. Subject to the foregoing specific and general objections, Plaintiff, after a reasonable inquiry, is unable to admit or deny the photograph is a "true, genuine and accurate depiction of the image displayed in the photograph" to the extent the image purports to depict metadata of the photograph.

152. Please admit that the photograph Bates Stamped ALH_00007090 is a true, genuine, and accurate depiction of the image displayed in the photograph.

ANSWER:

Plaintiff objects to this request to the extent it seeks information that is in the possession, custody or control of Defendant or third parties. Plaintiff further objects to this request to the extent it seeks information that is available to and equally accessible to Defendant. Plaintiff 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. Plaintiff objects to this request to the extent it seeks expert evidence. Plaintiff further objects to this request as the request is compound. Plaintiff objects to this request because the request does not have the specific document appended to the request. Subject to the foregoing specific and general objections, Plaintiff, after a reasonable inquiry, is unable to admit or deny the photograph is a "true, genuine and accurate

depiction of the image displayed in the photograph" to the extent the image purports to depict metadata of the photograph.

153. Please admit that the photograph Bates Stamped ALH_00007091 is a true, genuine, and accurate depiction of the image displayed in the photograph.

ANSWER:

Plaintiff objects to this request to the extent it seeks information that is in the possession, custody or control of Defendant or third parties. Plaintiff further objects to this request to the extent it seeks information that is available to and equally accessible to Defendant. Plaintiff 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. Plaintiff objects to this request to the extent it seeks expert evidence. Plaintiff further objects to this request as the request is compound. Plaintiff objects to this request because the request does not have the specific document appended to the request. Subject to the foregoing specific and general objections, Plaintiff, after a reasonable inquiry, is unable to admit or deny the photograph is a "true, genuine and accurate depiction of the image displayed in the photograph" to the extent the image purports to depict metadata of the photograph.

154. Please admit that the photograph Bates Stamped ALH_00007092 is a true, genuine, and accurate depiction of the image displayed in the photograph.

ANSWER:

Plaintiff objects to this request to the extent it seeks information that is in the possession, custody or control of Defendant or third parties. Plaintiff further objects to this request to the extent it seeks information that is available to and equally accessible to Defendant. Plaintiff 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. Plaintiff objects to this request to the extent it seeks expert evidence. Plaintiff further objects to this request as the request is compound. Plaintiff objects to this request because the request does not have the specific document appended to the request. Subject to the foregoing specific and general objections, Plaintiff, after a reasonable inquiry, is unable to admit or deny the photograph is a "true, genuine and accurate depiction of the image displayed in the photograph" to the extent the image purports to depict metadata of the photograph.

155. Please admit that the photograph Bates Stamped ALH_00007093 is a true, genuine, and accurate depiction of the image displayed in the photograph.

ANSWER:

Plaintiff objects to this request to the extent it seeks information that is in the possession, custody or control of Defendant or third parties. Plaintiff further objects to this request to the extent it seeks information that is available to and equally accessible to Defendant. Plaintiff 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. Plaintiff objects to this request to the extent it seeks expert evidence. Plaintiff further objects to this request as the request is compound. Plaintiff objects to this request because the request does not have the specific document appended to the request. Subject to the foregoing specific and general objections, Plaintiff, after a reasonable inquiry, is unable to admit or deny the photograph is a "true, genuine and accurate depiction of the image displayed in the photograph" to the extent the image purports to depict metadata of the photograph.

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156. Please admit that the photograph Bates Stamped ALH_00007094 is a true, genuine, and accurate depiction of the image displayed in the photograph.

ANSWER:

Plaintiff objects to this request to the extent it seeks information that is in the possession, custody or control of Defendant or third parties. Plaintiff further objects to this request to the extent it seeks information that is available to and equally accessible to Defendant. Plaintiff 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. Plaintiff objects to this request to the extent it seeks expert evidence. Plaintiff further objects to this request as the request is compound. Plaintiff objects to this request because the request does not have the specific document appended to the request. Subject to the foregoing specific and general objections, Plaintiff, after a reasonable inquiry, is unable to admit or deny the photograph is a "true, genuine and accurate depiction of the image displayed in the photograph" to the extent the image purports to depict metadata of the photograph.

157. Please admit that the photograph Bates Stamped ALH_00007095 is a true, genuine, and accurate depiction of the image displayed in the photograph.

ANSWER:

Plaintiff objects to this request to the extent it seeks information that is in the possession, custody or control of Defendant or third parties. Plaintiff further objects to this request to the extent it seeks information that is available to and equally accessible to Defendant. Plaintiff 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. Plaintiff objects to this request to the extent it seeks expert evidence. Plaintiff further objects to this request as the request is compound.

Plaintiff objects to this request because the request does not have the specific document appended to the request. Subject to the foregoing specific and general objections, Plaintiff, after a reasonable inquiry, is unable to admit or deny the photograph is a "true, genuine and accurate depiction of the image displayed in the photograph" to the extent the image purports to depict metadata of the photograph.

158. Please admit that the photograph Bates Stamped ALH_00007097 is a true, genuine, and accurate depiction of the image displayed in the photograph.

ANSWER:

Plaintiff objects to this request to the extent it seeks information that is in the possession, custody or control of Defendant or third parties. Plaintiff further objects to this request to the extent it seeks information that is available to and equally accessible to Defendant. Plaintiff 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. Plaintiff objects to this request to the extent it seeks expert evidence. Plaintiff further objects to this request as the request is compound. Plaintiff objects to this request because the request does not have the specific document appended to the request. Subject to the foregoing specific and general objections, Plaintiff, after a reasonable inquiry, is unable to admit or deny the photograph is a "true, genuine and accurate depiction of the image displayed in the photograph" to the extent the image purports to depict metadata of the photograph.

159. Please admit that the photograph Bates Stamped ALH_00007098 is a true, genuine, and accurate depiction of the image displayed in the photograph.

ANSWER:

Plaintiff objects to this request to the extent it seeks information that is in the possession, custody or control of Defendant or third parties. Plaintiff further objects to this request to the

extent it seeks information that is available to and equally accessible to Defendant. Plaintiff 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. Plaintiff objects to this request to the extent it seeks expert evidence. Plaintiff further objects to this request as the request is compound. Plaintiff objects to this request because the request does not have the specific document appended to the request. Subject to the foregoing specific and general objections, Plaintiff, after a reasonable inquiry, is unable to admit or deny the photograph is a "true, genuine and accurate depiction of the image displayed in the photograph" to the extent the image purports to depict metadata of the photograph.

160. Please admit that the photograph Bates Stamped ALH_00007099 is a true, genuine, and accurate depiction of the image displayed in the photograph.

ANSWER:

Plaintiff objects to this request to the extent it seeks information that is in the possession, custody or control of Defendant or third parties. Plaintiff further objects to this request to the extent it seeks information that is available to and equally accessible to Defendant. Plaintiff 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. Plaintiff objects to this request to the extent it seeks expert evidence. Plaintiff further objects to this request as the request is compound. Plaintiff objects to this request because the request does not have the specific document appended to the request. Subject to the foregoing specific and general objections, Plaintiff, after a reasonable inquiry, is unable to admit or deny the photograph is a "true, genuine and accurate

depiction of the image displayed in the photograph" to the extent the image purports to depict metadata of the photograph.

161. Please admit that the photograph Bates Stamped ALH_00007101 is a true, genuine, and accurate depiction of the image displayed in the photograph.

ANSWER:

Plaintiff objects to this request to the extent it seeks information that is in the possession, custody or control of Defendant or third parties. Plaintiff further objects to this request to the extent it seeks information that is available to and equally accessible to Defendant. Plaintiff 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. Plaintiff objects to this request to the extent it seeks expert evidence. Plaintiff further objects to this request as the request is compound. Plaintiff objects to this request because the request does not have the specific document appended to the request. Subject to the foregoing specific and general objections, Plaintiff admits the photograph referred to in the request appears to be a photograph of the Defendant. Plaintiff, after a reasonable inquiry, is unable to admit or deny the photograph is a "true, genuine and accurate depiction of the image displayed in the photograph" to the extent there is a depiction of an injury or injuries in the image.

162. Please admit that the photograph Bates Stamped ALH_00007096 is a true, genuine, and accurate depiction of the image displayed in the photograph.

ANSWER:

Plaintiff objects to this request as the request is compound. Plaintiff objects to this request because the request does not have the specific document appended to the request. Subject to the foregoing specific and general objections, Plaintiff, after a reasonable inquiry, is unable to

admit or deny the photograph is a "true, genuine and accurate depiction of the image displayed in the photograph" because there is no image.

163. Please admit that the transcript Bates Stamped ALH_00007103_001 is an accurate, genuine, and authentic transcription of the audio recording Bates Stamped ALH_00007102.

ANSWER:

Plaintiff objects to this request as the request is compound. Plaintiff objects to this request because the request does not have the specific document appended to the request. Subject to the foregoing specific and general objections, Plaintiff, after a reasonable inquiry, is unable to admit or deny the transcript is an "accurate, genuine and authentic transcription of the audio recording" to the extent the transcript purports to depict metadata of the audio recording.

164. Please admit that the transcript Bates Stamped ALH_00007104_001 is an accurate, genuine, and authentic transcription of the audio recording Bates Stamped ALH_00007102.

ANSWER:

Plaintiff objects to this request as the request is compound. Plaintiff objects to this request because the request does not have the specific document appended to the request. Subject to the foregoing specific and general objections, Plaintiff, after a reasonable inquiry, is unable to admit or deny the transcript is an "accurate, genuine and authentic transcription of the audio recording" to the extent the transcript purports to depict metadata of the audio recording.

165. Please admit that the transcript Bates Stamped ALH_00007106_001 - ALH_00007106_031 is an accurate, genuine, and authentic transcription of the audio recording Bates Stamped ALH_00007105.

ANSWER:

Plaintiff objects to this request as the request is compound. Plaintiff objects to this request because the request does not have the specific document appended to the request. Subject to the foregoing specific and general objections, Plaintiff, after a reasonable inquiry, is unable to

admit or deny the transcript is an "accurate, genuine and authentic transcription of the audio recording" to the extent the transcript purports to depict metadata of the audio recording.

166. Please admit that the transcript Bates Stamped ALH_00007110_001 - ALH_00007110_004 is an accurate, genuine, and authentic transcription of the audio recording Bates Stamped ALH_00007109.

ANSWER:

Plaintiff objects to this request as the request is compound. Plaintiff objects to this request because the request does not have the specific document appended to the request. Subject to the foregoing specific and general objections, Plaintiff, after a reasonable inquiry, is unable to admit or deny the transcript is an "accurate, genuine and authentic transcription of the audio recording" to the extent the transcript purports to depict metadata of the audio recording.

167. Please admit that the transcript Bates Stamped ALH_00007112_001 - ALH_00007112_010 is an accurate, genuine, and authentic transcription of the audio recording Bates Stamped ALH_00007111.

ANSWER:

Plaintiff objects to this request as the request is compound. Plaintiff objects to this request because the request does not have the specific document appended to the request. Subject to the foregoing specific and general objections, Plaintiff, after a reasonable inquiry, is unable to admit or deny the transcript is an "accurate, genuine and authentic transcription of the audio recording" to the extent the transcript purports to depict metadata of the audio recording.

168. Please admit that the transcript Bates Stamped ALH_00007113 - ALH_00007120 is an accurate, genuine, and authentic transcription of the audio recording Bates Stamped DEPP00018321.

ANSWER:

Plaintiff objects to this request as the request is compound. Plaintiff objects to this request because the request does not have the specific document appended to the request. Subject

to the foregoing specific and general objections, Plaintiff, after a reasonable inquiry, is unable to admit or deny the request because the documents referenced have not been produced.

169. Please admit that the transcript Bates Stamped ALH_00007121 - ALH_00007311 is an accurate, genuine, and authentic transcription of the audio recording Bates Stamped DEPP00018326.

ANSWER:

Plaintiff objects to this request as the request is compound. Plaintiff objects to this request because the request does not have the specific document appended to the request. Subject to the foregoing specific and general objections, Plaintiff, after a reasonable inquiry, is unable to admit or deny the request because the documents referenced have not been produced.

170. Please admit that the transcript Bates Stamped ALH_00007312 - ALH_0007480 is an accurate, genuine, and authentic transcription of the audio recording Bates Stamped DEPP00018322.

ANSWER:

Plaintiff objects to this request as the request is compound. Plaintiff objects to this request because the request does not have the specific document appended to the request. Subject to the foregoing specific and general objections, Plaintiff, after a reasonable inquiry, is unable to admit or deny the request because the documents referenced have not been produced.

171. Please admit that the transcript Bates Stamped ALH_00007481 - ALH_00007542 is an accurate, genuine, and authentic transcription of the audio recording Bates Stamped DEPP00018323.

ANSWER:

Plaintiff objects to this request as the request is compound. Plaintiff objects to this request because the request does not have the specific document appended to the request. Subject to the foregoing specific and general objections, Plaintiff, after a reasonable inquiry, is unable to admit or deny the request because the documents referenced have not been produced.

172. Please admit that the transcript Bates Stamped ALH_00007543 - ALH_00007622 is an accurate, genuine, and authentic transcription of the audio recording Bates Stamped DEPP00018324.

ANSWER:

Plaintiff objects to this request as the request is compound. Plaintiff objects to this request because the request does not have the specific document appended to the request. Subject to the foregoing specific and general objections, Plaintiff, after a reasonable inquiry, is unable to admit or deny the request because the documents referenced have not been produced.

173. Please admit that the transcript Bates Stamped ALH_00007623 - ALH_00007655 is an accurate, genuine, and authentic transcription of the audio recording Bates Stamped DEPP00018325.

ANSWER:

Plaintiff objects to this request as the request is compound. Plaintiff objects to this request because the request does not have the specific document appended to the request. Subject to the foregoing specific and general objections, Plaintiff, after a reasonable inquiry, is unable to admit or deny the request because the documents referenced have not been produced.

174. Please admit that the transcript Bates Stamped ALH_00007656 - ALH_00007674 is an accurate, genuine, and authentic transcription of the audio recording Bates Stamped DEPP00018319.

ANSWER:

Plaintiff objects to this request as the request is compound. Plaintiff objects to this request because the request does not have the specific document appended to the request. Subject to the foregoing specific and general objections, Plaintiff, after a reasonable inquiry, is unable to admit or deny the request because the documents referenced have not been produced.

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Dated: November 10, 2020

Respectfully submitted,

Benjamin G. Chew (VSB #29113)
Camille M. Vasquez (*pro hac vice*)
Andrew C. Crawford (VSB #89093)
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Counsel for Plaintiff John C. Depp, II

CERTIFICATE OF SERVICE

I hereby certify that on this 10th day of November 2020, I caused copies of the foregoing to be served via email (per written agreement between the Parties) on the following:

A. Benjamin Rottenborn (VSB No. 84796)
Joshua R. Treece (VSB No. 79149)
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Elaine Charlson Bredehoft (VSB No. 23766)
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Ben G. Chew (AC)

Benjamin G. Chew

63889374 v1-034692/0008

V I R G I N I A :

IN THE CIRCUIT COURT OF FAIRFAX COUNTY, VIRGINIA

JOHN C. DEPP, II	:	
	:	
Plaintiff and Counterclaim Defendant,	:	
	:	
v.	:	
	:	
AMBER LAURA HEARD,	:	Civil Action No.: CL-2019-0002911
	:	
Defendant and Counterclaim Plaintiff.	:	
	:	

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

Pursuant to Rule 4:9 of the Rules of the Supreme Court of Virginia, Plaintiff and Counterclaim Defendant John C. Depp, II ("Plaintiff" and/or "Mr. Depp"), by and through his undersigned counsel, hereby responds and objects to Defendant and Counterclaim Plaintiff Amber Laura Heard's ("Defendant" and/or "Ms. Heard") Seventeenth Set of Requests for Production of Documents (each, a "Request" and collectively, the "Requests"), dated November 29, 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

admissible evidence. Plaintiff further objects to this Request on the grounds that it is overly broad and unduly burdensome taking into account the needs of the case, including because it seeks "all" documents. 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 seeks documents that are protected by the attorney-client privilege, work-product doctrine, or any other applicable privilege, immunity, or protection. Plaintiff further objects to this Request on the grounds that it seeks private or confidential documents. Plaintiff further objects to this Request on the grounds that it is duplicative of other discovery. Plaintiff further objects that the Request is unreasonably broad and vague and calls for a legal conclusion in that it seeks all documents "supporting, refuting, or otherwise relating to" a statement. Plaintiff objects that Defendant has failed to describe reasonably identifiable categories of documents for production and instead has improperly attempted to shift the burden to Plaintiff to analyze what documents might be deemed to "support[], refut[e], or otherwise relat[e]" to a particular statement, which implicates the work product of counsel. Plaintiff further objects to the Request as being unduly cumulative and harassing.

48. Please produce all documents supporting, refuting, or otherwise relating to the "First Alleged Abuse in Late 2012/Early 2013" incidents referenced in ¶¶ 29-32 of Mr. Depp's Second Witness Statement, including all statements by Mr. Depp in those paragraphs.

RESPONSE:

Plaintiff repeats and incorporates by this reference the General Objections and Objections to Definitions and Instruction above, as though set forth in full. Plaintiff further objects to this Request – and to all other Requests herein – on the grounds that Defendant has served 217 Requests in this set of Requests for Production alone, and the content and number of these Requests are facially excessive, unduly burdensome, and harassing, and represent a misuse of the discovery process. 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 is overly broad and unduly burdensome taking into account the needs of the case, including because it seeks "all" documents. 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 seeks documents that are protected by the attorney-client privilege, work-product doctrine, or any other applicable privilege, immunity, or protection. Plaintiff further objects to this Request on the grounds that it seeks private or confidential documents. Plaintiff further objects to this Request on the grounds that it is duplicative of other discovery. Plaintiff further objects that the Request is unreasonably broad and vague and calls for a legal conclusion in that it seeks all documents "supporting, refuting, or otherwise relating to" a statement. Plaintiff objects that Defendant has failed to describe reasonably identifiable categories of documents for production and instead has improperly attempted to shift the burden to Plaintiff to analyze what documents might be deemed to "support[], refut[e], or otherwise relat[e]" to a particular statement, which implicates the work product of counsel. Plaintiff further objects to the Request as being unduly cumulative and harassing.

49. Please produce all documents supporting, refuting, or otherwise relating to the "March 8, 2013" incident referenced in ¶¶ 33-34 of Mr. Depp's Second Witness Statement, including all statements by Mr. Depp in those paragraphs.

RESPONSE:

Plaintiff repeats and incorporates by this reference the General Objections and Objections to Definitions and Instruction above, as though set forth in full. Plaintiff further objects to this Request – and to all other Requests herein – on the grounds that Defendant has served 217 Requests in this set of Requests for Production alone, and the content and number of these Requests are facially excessive, unduly burdensome, and harassing, and represent a misuse of the

discovery process. 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 is overly broad and unduly burdensome taking into account the needs of the case, including because it seeks "all" documents. 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 seeks documents that are protected by the attorney-client privilege, work-product doctrine, or any other applicable privilege, immunity, or protection. Plaintiff further objects to this Request on the grounds that it seeks private or confidential documents. Plaintiff further objects to this Request on the grounds that it is duplicative of other discovery. Plaintiff further objects that the Request is unreasonably broad and vague and calls for a legal conclusion in that it seeks all documents "supporting, refuting, or otherwise relating to" a statement. Plaintiff objects that Defendant has failed to describe reasonably identifiable categories of documents for production and instead has improperly attempted to shift the burden to Plaintiff to analyze what documents might be deemed to "support[], refut[e], or otherwise relat[e]" to a particular statement, which implicates the work product of counsel. Plaintiff further objects to the Request as being unduly cumulative and harassing.

50. Please produce all documents supporting, refuting, or otherwise relating to the "ay 24 and May 25, 2014" incidents referenced in ¶¶ 35-40 of Mr. Depp's Second Witness Statement, including all statements by Mr. Depp in those paragraphs.

RESPONSE:

Plaintiff repeats and incorporates by this reference the General Objections and Objections to Definitions and Instruction above, as though set forth in full. Plaintiff further objects to this Request – and to all other Requests herein – on the grounds that Defendant has served 217 Requests in this set of Requests for Production alone, and the content and number of these

Requests are facially excessive, unduly burdensome, and harassing, and represent a misuse of the discovery process. 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 is overly broad and unduly burdensome taking into account the needs of the case, including because it seeks "all" documents. 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 seeks documents that are protected by the attorney-client privilege, work-product doctrine, or any other applicable privilege, immunity, or protection. Plaintiff further objects to this Request on the grounds that it seeks private or confidential documents. Plaintiff further objects to this Request on the grounds that it is duplicative of other discovery. Plaintiff further objects that the Request is unreasonably broad and vague and calls for a legal conclusion in that it seeks all documents "supporting, refuting, or otherwise relating to" a statement. Plaintiff objects that Defendant has failed to describe reasonably identifiable categories of documents for production and instead has improperly attempted to shift the burden to Plaintiff to analyze what documents might be deemed to "support[], refut[e], or otherwise relat[e]" to a particular statement, which implicates the work product of counsel. Plaintiff further objects to the Request as being unduly cumulative and harassing.

51. Please produce all documents supporting, refuting, or otherwise relating to the "August 17, 2014" incident referenced in ¶¶ 41-46 of Mr. Depp's Second Witness Statement, including all statements by Mr. Depp in those paragraphs.

RESPONSE:

Plaintiff repeats and incorporates by this reference the General Objections and Objections to Definitions and Instruction above, as though set forth in full. Plaintiff further objects to this Request – and to all other Requests herein – on the grounds that Defendant has served 217

Requests in this set of Requests for Production alone, and the content and number of these Requests are facially excessive, unduly burdensome, and harassing, and represent a misuse of the discovery process. 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 is overly broad and unduly burdensome taking into account the needs of the case, including because it seeks "all" documents. 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 seeks documents that are protected by the attorney-client privilege, work-product doctrine, or any other applicable privilege, immunity, or protection. Plaintiff further objects to this Request on the grounds that it seeks private or confidential documents. Plaintiff further objects to this Request on the grounds that it is duplicative of other discovery. Plaintiff further objects that the Request is unreasonably broad and vague and calls for a legal conclusion in that it seeks all documents "supporting, refuting, or otherwise relating to" a statement. Plaintiff objects that Defendant has failed to describe reasonably identifiable categories of documents for production and instead has improperly attempted to shift the burden to Plaintiff to analyze what documents might be deemed to "support[], refut[e], or otherwise relat[e]" to a particular statement, which implicates the work product of counsel. Plaintiff further objects to the Request as being unduly cumulative and harassing.

52. Please produce all documents supporting, refuting, or otherwise relating to the "December 17, 2014" incident referenced in ¶¶ 47-48 of Mr. Depp's Second Witness Statement, including all statements by Mr. Depp in those paragraphs.

RESPONSE:

Plaintiff repeats and incorporates by this reference the General Objections and Objections to Definitions and Instruction above, as though set forth in full. Plaintiff further objects to this

Request – and to all other Requests herein – on the grounds that Defendant has served 217 Requests in this set of Requests for Production alone, and the content and number of these Requests are facially excessive, unduly burdensome, and harassing, and represent a misuse of the discovery process. 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 is overly broad and unduly burdensome taking into account the needs of the case, including because it seeks "all" documents. 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 seeks documents that are protected by the attorney-client privilege, work-product doctrine, or any other applicable privilege, immunity, or protection. Plaintiff further objects to this Request on the grounds that it seeks private or confidential documents. Plaintiff further objects to this Request on the grounds that it is duplicative of other discovery. Plaintiff further objects that the Request is unreasonably broad and vague and calls for a legal conclusion in that it seeks all documents "supporting, refuting, or otherwise relating to" a statement. Plaintiff objects that Defendant has failed to describe reasonably identifiable categories of documents for production and instead has improperly attempted to shift the burden to Plaintiff to analyze what documents might be deemed to "support[], refut[e], or otherwise relat[e]" to a particular statement, which implicates the work product of counsel. Plaintiff further objects to the Request as being unduly cumulative and harassing.

53. Please produce all documents supporting, refuting, or otherwise relating to the "January 25, 2015" incident referenced in ¶¶ 49-50 of Mr. Depp's Second Witness Statement, including all statements by Mr. Depp in those paragraphs.

RESPONSE:

Plaintiff repeats and incorporates by this reference the General Objections and Objections to Definitions and Instruction above, as though set forth in full. Plaintiff further objects to this Request – and to all other Requests herein – on the grounds that Defendant has served 217 Requests in this set of Requests for Production alone, and the content and number of these Requests are facially excessive, unduly burdensome, and harassing, and represent a misuse of the discovery process. 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 is overly broad and unduly burdensome taking into account the needs of the case, including because it seeks "all" documents. 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 seeks documents that are protected by the attorney-client privilege, work-product doctrine, or any other applicable privilege, immunity, or protection. Plaintiff further objects to this Request on the grounds that it seeks private or confidential documents. Plaintiff further objects to this Request on the grounds that it is duplicative of other discovery. Plaintiff further objects that the Request is unreasonably broad and vague and calls for a legal conclusion in that it seeks all documents "supporting, refuting, or otherwise relating to" a statement. Plaintiff objects that Defendant has failed to describe reasonably identifiable categories of documents for production and instead has improperly attempted to shift the burden to Plaintiff to analyze what documents might be deemed to "support[], refut[e], or otherwise relat[e]" to a particular statement, which implicates the work

product of counsel. Plaintiff further objects to the Request as being unduly cumulative and harassing.

54. Please produce all documents supporting, refuting, or otherwise relating to the "March 2015" incident referenced in ¶¶ 51-65 of Mr. Depp's Second Witness Statement, including all statements by Mr. Depp in those paragraphs.

RESPONSE:

Plaintiff repeats and incorporates by this reference the General Objections and Objections to Definitions and Instruction above, as though set forth in full. Plaintiff further objects to this Request – and to all other Requests herein – on the grounds that Defendant has served 217 Requests in this set of Requests for Production alone, and the content and number of these Requests are facially excessive, unduly burdensome, and harassing, and represent a misuse of the discovery process. 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 is overly broad and unduly burdensome taking into account the needs of the case, including because it seeks "all" documents. 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 seeks documents that are protected by the attorney-client privilege, work-product doctrine, or any other applicable privilege, immunity, or protection. Plaintiff further objects to this Request on the grounds that it seeks private or confidential documents. Plaintiff further objects to this Request on the grounds that it is duplicative of other discovery. Plaintiff further objects that the Request is unreasonably broad and vague and calls for a legal conclusion in that it seeks all documents "supporting, refuting, or otherwise relating to" a statement. Plaintiff objects that Defendant has failed to describe reasonably identifiable categories of documents for production and instead has improperly attempted to shift the burden to Plaintiff to analyze what documents might be deemed

to "support[], refut[e], or otherwise relat[e]" to a particular statement, which implicates the work product of counsel. Plaintiff further objects to the Request as being unduly cumulative and harassing.

55. Please produce all documents supporting, refuting, or otherwise relating to the "March 2015" incident referenced in ¶¶ 66-68 of Mr. Depp's Second Witness Statement, including all statements by Mr. Depp in those paragraphs.

RESPONSE:

Plaintiff repeats and incorporates by this reference the General Objections and Objections to Definitions and Instruction above, as though set forth in full. Plaintiff further objects to this Request – and to all other Requests herein – on the grounds that Defendant has served 217 Requests in this set of Requests for Production alone, and the content and number of these Requests are facially excessive, unduly burdensome, and harassing, and represent a misuse of the discovery process. 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 is overly broad and unduly burdensome taking into account the needs of the case, including because it seeks "all" documents. 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 seeks documents that are protected by the attorney-client privilege, work-product doctrine, or any other applicable privilege, immunity, or protection. Plaintiff further objects to this Request on the grounds that it seeks private or confidential documents. Plaintiff further objects to this Request on the grounds that it is duplicative of other discovery. Plaintiff further objects that the Request is unreasonably broad and vague and calls for a legal conclusion in that it seeks all documents "supporting, refuting, or otherwise relating to" a statement. Plaintiff objects that Defendant has failed to describe reasonably identifiable categories of documents for production and instead has

improperly attempted to shift the burden to Plaintiff to analyze what documents might be deemed to "support[], refut[e], or otherwise relat[e]" to a particular statement, which implicates the work product of counsel. Plaintiff further objects to the Request as being unduly cumulative and harassing.

56. Please produce all documents supporting, refuting, or otherwise relating to the "August 2015" incident referenced in ¶¶ 69-76 of Mr. Depp's Second Witness Statement, including all statements by Mr. Depp in those paragraphs.

RESPONSE:

Plaintiff repeats and incorporates by this reference the General Objections and Objections to Definitions and Instruction above, as though set forth in full. Plaintiff further objects to this Request – and to all other Requests herein – on the grounds that Defendant has served 217 Requests in this set of Requests for Production alone, and the content and number of these Requests are facially excessive, unduly burdensome, and harassing, and represent a misuse of the discovery process. 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 is overly broad and unduly burdensome taking into account the needs of the case, including because it seeks "all" documents. 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 seeks documents that are protected by the attorney-client privilege, work-product doctrine, or any other applicable privilege, immunity, or protection. Plaintiff further objects to this Request on the grounds that it seeks private or confidential documents. Plaintiff further objects to this Request on the grounds that it is duplicative of other discovery. Plaintiff further objects that the Request is unreasonably broad and vague and calls for a legal conclusion in that it seeks all documents "supporting, refuting, or otherwise relating to" a statement. Plaintiff objects that Defendant has

failed to describe reasonably identifiable categories of documents for production and instead has improperly attempted to shift the burden to Plaintiff to analyze what documents might be deemed to "support[], refut[e], or otherwise relat[e]" to a particular statement, which implicates the work product of counsel. Plaintiff further objects to the Request as being unduly cumulative and harassing.

57. Please produce all documents supporting, refuting, or otherwise relating to the "November 26, 2015" incident referenced in ¶¶ 77-79 of Mr. Depp's Second Witness Statement, including all statements by Mr. Depp in those paragraphs.

RESPONSE:

Plaintiff repeats and incorporates by this reference the General Objections and Objections to Definitions and Instruction above, as though set forth in full. Plaintiff further objects to this Request – and to all other Requests herein – on the grounds that Defendant has served 217 Requests in this set of Requests for Production alone, and the content and number of these Requests are facially excessive, unduly burdensome, and harassing, and represent a misuse of the discovery process. 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 is overly broad and unduly burdensome taking into account the needs of the case, including because it seeks "all" documents. 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 seeks documents that are protected by the attorney-client privilege, work-product doctrine, or any other applicable privilege, immunity, or protection. Plaintiff further objects to this Request on the grounds that it seeks private or confidential documents. Plaintiff further objects to this Request on the grounds that it is duplicative of other discovery. Plaintiff further objects that the Request is unreasonably broad and vague and calls for a legal conclusion in that it seeks all documents

"supporting, refuting, or otherwise relating to" a statement. Plaintiff objects that Defendant has failed to describe reasonably identifiable categories of documents for production and instead has improperly attempted to shift the burden to Plaintiff to analyze what documents might be deemed to "support[], refut[e], or otherwise relat[e]" to a particular statement, which implicates the work product of counsel. Plaintiff further objects to the Request as being unduly cumulative and harassing.

58. Please produce all documents supporting, refuting, or otherwise relating to the "April 21, 2016" incident referenced in ¶¶ 80-86 of Mr. Depp's Second Witness Statement, including all statements by Mr. Depp in those paragraphs.

RESPONSE:

Plaintiff repeats and incorporates by this reference the General Objections and Objections to Definitions and Instruction above, as though set forth in full. Plaintiff further objects to this Request – and to all other Requests herein – on the grounds that Defendant has served 217 Requests in this set of Requests for Production alone, and the content and number of these Requests are facially excessive, unduly burdensome, and harassing, and represent a misuse of the discovery process. 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 is overly broad and unduly burdensome taking into account the needs of the case, including because it seeks "all" documents. 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 seeks documents that are protected by the attorney-client privilege, work-product doctrine, or any other applicable privilege, immunity, or protection. Plaintiff further objects to this Request on the grounds that it seeks private or confidential documents. Plaintiff further objects to this Request on the grounds that it is duplicative of other discovery. Plaintiff further objects that the Request

is unreasonably broad and vague and calls for a legal conclusion in that it seeks all documents "supporting, refuting, or otherwise relating to" a statement. Plaintiff objects that Defendant has failed to describe reasonably identifiable categories of documents for production and instead has improperly attempted to shift the burden to Plaintiff to analyze what documents might be deemed to "support[], refut[e], or otherwise relat[e]" to a particular statement, which implicates the work product of counsel. Plaintiff further objects to the Request as being unduly cumulative and harassing.

59. Please produce all documents supporting, refuting, or otherwise relating to the "May 21, 2016" incident referenced in ¶¶ 87-99 of Mr. Depp's Second Witness Statement, including all statements by Mr. Depp in those paragraphs.

RESPONSE:

Plaintiff repeats and incorporates by this reference the General Objections and Objections to Definitions and Instruction above, as though set forth in full. Plaintiff further objects to this Request – and to all other Requests herein – on the grounds that Defendant has served 217 Requests in this set of Requests for Production alone, and the content and number of these Requests are facially excessive, unduly burdensome, and harassing, and represent a misuse of the discovery process. 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 is overly broad and unduly burdensome taking into account the needs of the case, including because it seeks "all" documents. 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 seeks documents that are protected by the attorney-client privilege, work-product doctrine, or any other applicable privilege, immunity, or protection. Plaintiff further objects to this Request on the grounds that it seeks private or confidential documents. Plaintiff further objects to this Request

on the grounds that it is duplicative of other discovery. Plaintiff further objects that the Request is unreasonably broad and vague and calls for a legal conclusion in that it seeks all documents "supporting, refuting, or otherwise relating to" a statement. Plaintiff objects that Defendant has failed to describe reasonably identifiable categories of documents for production and instead has improperly attempted to shift the burden to Plaintiff to analyze what documents might be deemed to "support[], refut[e], or otherwise relat[e]" to a particular statement, which implicates the work product of counsel. Plaintiff further objects to the Request as being unduly cumulative and harassing.

60. Please produce all documents supporting, refuting, or otherwise relating to the "The TRO Application" referenced in ¶¶ 100-110 of Mr. Depp's Second Witness Statement, including all statements by Mr. Depp in those paragraphs.

RESPONSE:

Plaintiff repeats and incorporates by this reference the General Objections and Objections to Definitions and Instruction above, as though set forth in full. Plaintiff further objects to this Request – and to all other Requests herein – on the grounds that Defendant has served 217 Requests in this set of Requests for Production alone, and the content and number of these Requests are facially excessive, unduly burdensome, and harassing, and represent a misuse of the discovery process. 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 is overly broad and unduly burdensome taking into account the needs of the case, including because it seeks "all" documents. 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 seeks documents that are protected by the attorney-client privilege, work-product doctrine, or any other applicable privilege, immunity, or protection. Plaintiff further objects to this Request on the

admissible evidence. Plaintiff further objects to this Request on the grounds that it is overly broad and unduly burdensome taking into account the needs of the case, including because it seeks "all" documents. 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 seeks documents that are protected by the attorney-client privilege, work-product doctrine, or any other applicable privilege, immunity, or protection. Plaintiff further objects to this Request on the grounds that it seeks private or confidential documents. Plaintiff further objects to this Request on the grounds that it is duplicative of other discovery. Plaintiff further objects that the Request is unreasonably broad and vague and calls for a legal conclusion in that it seeks all documents "supporting, refuting, or otherwise relating to" a statement. Plaintiff objects that Defendant has failed to describe reasonably identifiable categories of documents for production and instead has improperly attempted to shift the burden to Plaintiff to analyze what documents might be deemed to "support[], refut[e], or otherwise relat[e]" to a particular statement, which implicates the work product of counsel. Plaintiff further objects to the Request as being unduly cumulative and harassing.

65. Please produce all documents supporting, refuting, or otherwise relating to the "Alleged first violent incident in early 2013 referenced in ¶¶ 7-8 Mr. Depp's Third Witness Statement, including all statements by Mr. Depp in those paragraphs.

RESPONSE:

Plaintiff repeats and incorporates by this reference the General Objections and Objections to Definitions and Instruction above, as though set forth in full. Plaintiff further objects to this Request – and to all other Requests herein – on the grounds that Defendant has served 217 Requests in this set of Requests for Production alone, and the content and number of these Requests are facially excessive, unduly burdensome, and harassing, and represent a misuse of the discovery process. 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 is overly broad and unduly burdensome taking into account the needs of the case, including because it seeks "all" documents. 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 seeks documents that are protected by the attorney-client privilege, work-product doctrine, or any other applicable privilege, immunity, or protection. Plaintiff further objects to this Request on the grounds that it seeks private or confidential documents. Plaintiff further objects to this Request on the grounds that it is duplicative of other discovery. Plaintiff further objects that the Request is unreasonably broad and vague and calls for a legal conclusion in that it seeks all documents "supporting, refuting, or otherwise relating to" a statement. Plaintiff objects that Defendant has failed to describe reasonably identifiable categories of documents for production and instead has improperly attempted to shift the burden to Plaintiff to analyze what documents might be deemed to "support[], refut[e], or otherwise relat[e]" to a particular statement, which implicates the work product of counsel. Plaintiff further objects to the Request as being unduly cumulative and harassing.

66. Please produce all documents supporting, refuting, or otherwise relating to the "Painting Incident, March 2013" referenced in ¶¶ 9-13 of Mr. Depp's Third Witness Statement, including all statements by Mr. Depp in those paragraphs.

RESPONSE:

Plaintiff repeats and incorporates by this reference the General Objections and Objections to Definitions and Instruction above, as though set forth in full. Plaintiff further objects to this Request – and to all other Requests herein – on the grounds that Defendant has served 217 Requests in this set of Requests for Production alone, and the content and number of these Requests are facially excessive, unduly burdensome, and harassing, and represent a misuse of the

discovery process. 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 is overly broad and unduly burdensome taking into account the needs of the case, including because it seeks "all" documents. 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 seeks documents that are protected by the attorney-client privilege, work-product doctrine, or any other applicable privilege, immunity, or protection. Plaintiff further objects to this Request on the grounds that it seeks private or confidential documents. Plaintiff further objects to this Request on the grounds that it is duplicative of other discovery. Plaintiff further objects that the Request is unreasonably broad and vague and calls for a legal conclusion in that it seeks all documents "supporting, refuting, or otherwise relating to" a statement. Plaintiff objects that Defendant has failed to describe reasonably identifiable categories of documents for production and instead has improperly attempted to shift the burden to Plaintiff to analyze what documents might be deemed to "support[], refut[e], or otherwise relat[e]" to a particular statement, which implicates the work product of counsel. Plaintiff further objects to the Request as being unduly cumulative and harassing.

67. Please produce all documents supporting, refuting, or otherwise relating to the "June 2013, Hicksville" incident referenced in ¶¶ 14-19 of Mr. Depp's Third Witness Statement, including all statements by Mr. Depp in those paragraphs.

RESPONSE:

Plaintiff repeats and incorporates by this reference the General Objections and Objections to Definitions and Instruction above, as though set forth in full. Plaintiff further objects to this Request – and to all other Requests herein – on the grounds that Defendant has served 217 Requests in this set of Requests for Production alone, and the content and number of these

Requests are facially excessive, unduly burdensome, and harassing, and represent a misuse of the discovery process. 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 is overly broad and unduly burdensome taking into account the needs of the case, including because it seeks "all" documents. 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 seeks documents that are protected by the attorney-client privilege, work-product doctrine, or any other applicable privilege, immunity, or protection. Plaintiff further objects to this Request on the grounds that it seeks private or confidential documents. Plaintiff further objects to this Request on the grounds that it is duplicative of other discovery. Plaintiff further objects that the Request is unreasonably broad and vague and calls for a legal conclusion in that it seeks all documents "supporting, refuting, or otherwise relating to" a statement. Plaintiff objects that Defendant has failed to describe reasonably identifiable categories of documents for production and instead has improperly attempted to shift the burden to Plaintiff to analyze what documents might be deemed to "support[], refut[e], or otherwise relat[e]" to a particular statement, which implicates the work product of counsel. Plaintiff further objects to the Request as being unduly cumulative and harassing.

68. Please produce all documents supporting, refuting, or otherwise relating to the "24 May 2014- Plane Incident from Boston to LA" referenced in ¶¶ 20-21 of Mr. Depp's Third Witness Statement, including all statements by Mr. Depp in those paragraphs.

RESPONSE:

Plaintiff repeats and incorporates by this reference the General Objections and Objections to Definitions and Instruction above, as though set forth in full. Plaintiff further objects to this Request – and to all other Requests herein – on the grounds that Defendant has served 217

Requests in this set of Requests for Production alone, and the content and number of these Requests are facially excessive, unduly burdensome, and harassing, and represent a misuse of the discovery process. 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 is overly broad and unduly burdensome taking into account the needs of the case, including because it seeks "all" documents. 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 seeks documents that are protected by the attorney-client privilege, work-product doctrine, or any other applicable privilege, immunity, or protection. Plaintiff further objects to this Request on the grounds that it seeks private or confidential documents. Plaintiff further objects to this Request on the grounds that it is duplicative of other discovery. Plaintiff further objects that the Request is unreasonably broad and vague and calls for a legal conclusion in that it seeks all documents "supporting, refuting, or otherwise relating to" a statement. Plaintiff objects that Defendant has failed to describe reasonably identifiable categories of documents for production and instead has improperly attempted to shift the burden to Plaintiff to analyze what documents might be deemed to "support[], refut[e], or otherwise relat[e]" to a particular statement, which implicates the work product of counsel. Plaintiff further objects to the Request as being unduly cumulative and harassing.

69. Please produce all documents supporting, refuting, or otherwise relating to the "August 2017- Bahamas" incident referenced in ¶ 22 of Mr. Depp's Third Witness Statement, including all statements by Mr. Depp in those paragraphs.

RESPONSE:

Plaintiff repeats and incorporates by this reference the General Objections and Objections to Definitions and Instruction above, as though set forth in full. Plaintiff further objects to this

Request – and to all other Requests herein – on the grounds that Defendant has served 217 Requests in this set of Requests for Production alone, and the content and number of these Requests are facially excessive, unduly burdensome, and harassing, and represent a misuse of the discovery process. 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 is overly broad and unduly burdensome taking into account the needs of the case, including because it seeks "all" documents. 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 seeks documents that are protected by the attorney-client privilege, work-product doctrine, or any other applicable privilege, immunity, or protection. Plaintiff further objects to this Request on the grounds that it seeks private or confidential documents. Plaintiff further objects to this Request on the grounds that it is duplicative of other discovery. Plaintiff further objects that the Request is unreasonably broad and vague and calls for a legal conclusion in that it seeks all documents "supporting, refuting, or otherwise relating to" a statement. Plaintiff objects that Defendant has failed to describe reasonably identifiable categories of documents for production and instead has improperly attempted to shift the burden to Plaintiff to analyze what documents might be deemed to "support[], refut[e], or otherwise relat[e]" to a particular statement, which implicates the work product of counsel. Plaintiff further objects to the Request as being unduly cumulative and harassing.

70. Please produce all documents supporting, refuting, or otherwise relating to the "March 2015, Australia" incident referenced in ¶¶ 23-30 of Mr. Depp's Third Witness Statement, including all statements by Mr. Depp in those paragraphs.

RESPONSE:

Plaintiff repeats and incorporates by this reference the General Objections and Objections to Definitions and Instruction above, as though set forth in full. Plaintiff further objects to this Request – and to all other Requests herein – on the grounds that Defendant has served 217 Requests in this set of Requests for Production alone, and the content and number of these Requests are facially excessive, unduly burdensome, and harassing, and represent a misuse of the discovery process. 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 is overly broad and unduly burdensome taking into account the needs of the case, including because it seeks "all" documents. 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 seeks documents that are protected by the attorney-client privilege, work-product doctrine, or any other applicable privilege, immunity, or protection. Plaintiff further objects to this Request on the grounds that it seeks private or confidential documents. Plaintiff further objects to this Request on the grounds that it is duplicative of other discovery. Plaintiff further objects that the Request is unreasonably broad and vague and calls for a legal conclusion in that it seeks all documents "supporting, refuting, or otherwise relating to" a statement. Plaintiff objects that Defendant has failed to describe reasonably identifiable categories of documents for production and instead has improperly attempted to shift the burden to Plaintiff to analyze what documents might be deemed to "support[], refut[e], or otherwise relat[e]" to a particular statement, which implicates the work

product of counsel. Plaintiff further objects to the Request as being unduly cumulative and harassing.

71. Please produce all documents supporting, refuting, or otherwise relating to the March 2015- Los Angeles" incident referenced in ¶¶ 31-32 of Mr. Depp's Third Witness Statement, including all statements by Mr. Depp in those paragraphs.

RESPONSE:

Plaintiff repeats and incorporates by this reference the General Objections and Objections to Definitions and Instruction above, as though set forth in full. Plaintiff further objects to this Request – and to all other Requests herein – on the grounds that Defendant has served 217 Requests in this set of Requests for Production alone, and the content and number of these Requests are facially excessive, unduly burdensome, and harassing, and represent a misuse of the discovery process. 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 is overly broad and unduly burdensome taking into account the needs of the case, including because it seeks "all" documents. 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 seeks documents that are protected by the attorney-client privilege, work-product doctrine, or any other applicable privilege, immunity, or protection. Plaintiff further objects to this Request on the grounds that it seeks private or confidential documents. Plaintiff further objects to this Request on the grounds that it is duplicative of other discovery. Plaintiff further objects that the Request is unreasonably broad and vague and calls for a legal conclusion in that it seeks all documents "supporting, refuting, or otherwise relating to" a statement. Plaintiff objects that Defendant has failed to describe reasonably identifiable categories of documents for production and instead has improperly attempted to shift the burden to Plaintiff to analyze what documents might be deemed

to "support[], refut[e], or otherwise relat[e]" to a particular statement, which implicates the work product of counsel. Plaintiff further objects to the Request as being unduly cumulative and harassing.

72. Please produce all documents supporting, refuting, or otherwise relating to the April 21, 2016" incident referenced in ¶ 33 of Mr. Depp's Third Witness Statement.

RESPONSE:

Plaintiff repeats and incorporates by this reference the General Objections and Objections to Definitions and Instruction above, as though set forth in full. Plaintiff further objects to this Request – and to all other Requests herein – on the grounds that Defendant has served 217 Requests in this set of Requests for Production alone, and the content and number of these Requests are facially excessive, unduly burdensome, and harassing, and represent a misuse of the discovery process. 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 is overly broad and unduly burdensome taking into account the needs of the case, including because it seeks "all" documents. 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 seeks documents that are protected by the attorney-client privilege, work-product doctrine, or any other applicable privilege, immunity, or protection. Plaintiff further objects to this Request on the grounds that it seeks private or confidential documents. Plaintiff further objects to this Request on the grounds that it is duplicative of other discovery. Plaintiff further objects that the Request is unreasonably broad and vague and calls for a legal conclusion in that it seeks all documents "supporting, refuting, or otherwise relating to" a statement. Plaintiff objects that Defendant has failed to describe reasonably identifiable categories of documents for production and instead has

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 seeks documents that are protected by the attorney-client privilege, work-product doctrine, or any other applicable privilege, immunity, or protection. Plaintiff further objects to this Request on the grounds that it seeks private or confidential documents. Plaintiff further objects to this Request on the grounds that it is duplicative of other discovery. Plaintiff further objects that the Request is unreasonably broad and vague and calls for a legal conclusion in that it seeks all documents "supporting, refuting, or otherwise related to" a statement. Plaintiff objects that Defendant has failed to describe reasonably identifiable categories of documents for production and instead has improperly attempted to shift the burden to Plaintiff to analyze what documents might be deemed to "support[], refut[e], or otherwise relat[e]" to a particular statement, which implicates the work product of counsel. Plaintiff further objects to this Request on the grounds that it seeks documents already in possession of Defendant and/or her attorneys, and/or is equally available to Defendant and/or her attorneys, and represents an improper attempt to shift the burden of producing such documents to Plaintiff, where such statements were made in Defendant's own Declaration. Plaintiff further objects to the Request as being unduly cumulative and harassing.

79. Please produce all documents supporting, refuting, or otherwise relating to the "Late 2012/Early 2013, Los Angeles California" incident referenced in ¶ 5 of the Declaration of Ms. Heard, including all statements made in those paragraphs.

RESPONSE:

Plaintiff repeats and incorporates by this reference the General Objections and Objections to Definitions and Instruction above, as though set forth in full. Plaintiff further objects to this Request – and to all other Requests herein – on the grounds that Defendant has served 217 Requests in this set of Requests for Production alone, and the content and number of these Requests are facially excessive, unduly burdensome, and harassing, and represent a misuse of the

discovery process. 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 on the grounds that the Request purports to require Plaintiff to speculate as to what documents might relate to Defendant's own allegations. Plaintiff further objects to this Request on the grounds that it is overly broad and unduly burdensome taking into account the needs of the case, including because it seeks "all" documents. 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 seeks documents that are protected by the attorney-client privilege, work-product doctrine, or any other applicable privilege, immunity, or protection. Plaintiff further objects to this Request on the grounds that it seeks private or confidential documents. Plaintiff further objects to this Request on the grounds that it is duplicative of other discovery. Plaintiff further objects that the Request is unreasonably broad and vague and calls for a legal conclusion in that it seeks all documents "supporting, refuting, or otherwise related to" a statement. Plaintiff objects that Defendant has failed to describe reasonably identifiable categories of documents for production and instead has improperly attempted to shift the burden to Plaintiff to analyze what documents might be deemed to "support[], refut[e], or otherwise relat[e]" to a particular statement, which implicates the work product of counsel. Plaintiff further objects to this Request on the grounds that it seeks documents already in possession of Defendant and/or her attorneys, and/or is equally available to Defendant and/or her attorneys, and represents an improper attempt to shift the burden of producing such documents to Plaintiff, where such statements were made in Defendant's own Declaration. Plaintiff further objects to the Request as being unduly cumulative and harassing.

80. Please produce all documents supporting, refuting, or otherwise relating to the "March 8, 2013 Los Angeles, California" incident referenced in ¶ 6 of the Declaration of Ms. Heard, including all statements made in those paragraphs.

RESPONSE:

Plaintiff repeats and incorporates by this reference the General Objections and Objections to Definitions and Instruction above, as though set forth in full. Plaintiff further objects to this Request – and to all other Requests herein – on the grounds that Defendant has served 217 Requests in this set of Requests for Production alone, and the content and number of these Requests are facially excessive, unduly burdensome, and harassing, and represent a misuse of the discovery process. 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 on the grounds that the Request purports to require Plaintiff to speculate as to what documents might relate to Defendant's own allegations. Plaintiff further objects to this Request on the grounds that it is overly broad and unduly burdensome taking into account the needs of the case, including because it seeks "all" documents. 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 seeks documents that are protected by the attorney-client privilege, work-product doctrine, or any other applicable privilege, immunity, or protection. Plaintiff further objects to this Request on the grounds that it seeks private or confidential documents. Plaintiff further objects to this Request on the grounds that it is duplicative of other discovery. Plaintiff further objects that the Request is unreasonably broad and vague and calls for a legal conclusion in that it seeks all documents "supporting, refuting, or otherwise related to" a statement. Plaintiff objects that Defendant has failed to describe reasonably identifiable categories of documents for production and instead has improperly attempted to shift the burden to Plaintiff to analyze what documents might be deemed to

"support[], refut[e], or otherwise relat[e]" to a particular statement, which implicates the work product of counsel. Plaintiff further objects to this Request on the grounds that it seeks documents already in possession of Defendant and/or her attorneys, and/or is equally available to Defendant and/or her attorneys, and represents an improper attempt to shift the burden of producing such documents to Plaintiff, where such statements were made in Defendant's own Declaration. Plaintiff further objects to the Request as being unduly cumulative and harassing.

81. Please produce all documents supporting, refuting, or otherwise relating to the "May 24, 2014, Flight from Boston, Massachusetts to Los Angeles, California" incident referenced in ¶¶ 7-8 of the Declaration of Ms. Heard, including all statements made in those paragraphs.

RESPONSE:

Plaintiff repeats and incorporates by this reference the General Objections and Objections to Definitions and Instruction above, as though set forth in full. Plaintiff further objects to this Request – and to all other Requests herein – on the grounds that Defendant has served 217 Requests in this set of Requests for Production alone, and the content and number of these Requests are facially excessive, unduly burdensome, and harassing, and represent a misuse of the discovery process. 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 on the grounds that the Request purports to require Plaintiff to speculate as to what documents might relate to Defendant's own allegations. Plaintiff further objects to this Request on the grounds that it is overly broad and unduly burdensome taking into account the needs of the case, including because it seeks "all" documents. 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 seeks documents that are protected by the attorney-client privilege, work-product doctrine, or any other applicable privilege,

immunity, or protection. Plaintiff further objects to this Request on the grounds that it seeks private or confidential documents. Plaintiff further objects to this Request on the grounds that it is duplicative of other discovery. Plaintiff further objects that the Request is unreasonably broad and vague and calls for a legal conclusion in that it seeks all documents "supporting, refuting, or otherwise related to" a statement. Plaintiff objects that Defendant has failed to describe reasonably identifiable categories of documents for production and instead has improperly attempted to shift the burden to Plaintiff to analyze what documents might be deemed to "support[], refut[e], or otherwise relat[e]" to a particular statement, which implicates the work product of counsel. Plaintiff further objects to this Request on the grounds that it seeks documents already in possession of Defendant and/or her attorneys, and/or is equally available to Defendant and/or her attorneys, and represents an improper attempt to shift the burden of producing such documents to Plaintiff, where such statements were made in Defendant's own Declaration. Plaintiff further objects to the Request as being unduly cumulative and harassing.

82. Please produce all documents supporting, refuting, or otherwise relating to the "August 2014, Bahamas" incident referenced in ¶¶ 9-11 of the Declaration of Ms. Heard, including all statements made in those paragraphs.

RESPONSE:

Plaintiff repeats and incorporates by this reference the General Objections and Objections to Definitions and Instruction above, as though set forth in full. Plaintiff further objects to this Request – and to all other Requests herein – on the grounds that Defendant has served 217 Requests in this set of Requests for Production alone, and the content and number of these Requests are facially excessive, unduly burdensome, and harassing, and represent a misuse of the discovery process. 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 on the grounds that the Request purports to require

Plaintiff to speculate as to what documents might relate to Defendant's own allegations. Plaintiff further objects to this Request on the grounds that it is overly broad and unduly burdensome taking into account the needs of the case, including because it seeks "all" documents. 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 seeks documents that are protected by the attorney-client privilege, work-product doctrine, or any other applicable privilege, immunity, or protection. Plaintiff further objects to this Request on the grounds that it seeks private or confidential documents. Plaintiff further objects to this Request on the grounds that it is duplicative of other discovery. Plaintiff further objects that the Request is unreasonably broad and vague and calls for a legal conclusion in that it seeks all documents "supporting, refuting, or otherwise related to" a statement. Plaintiff objects that Defendant has failed to describe reasonably identifiable categories of documents for production and instead has improperly attempted to shift the burden to Plaintiff to analyze what documents might be deemed to "support[], refut[e], or otherwise relat[e]" to a particular statement, which implicates the work product of counsel. Plaintiff further objects to this Request on the grounds that it seeks documents already in possession of Defendant and/or her attorneys, and/or is equally available to Defendant and/or her attorneys, and represents an improper attempt to shift the burden of producing such documents to Plaintiff, where such statements were made in Defendant's own Declaration. Plaintiff further objects to the Request as being unduly cumulative and harassing.

83. Please produce all documents supporting, refuting, or otherwise relating to the "December 17, 2014, Los Angeles, California" incident referenced in ¶ 12 of the Declaration of Ms. Heard, including all statements made in those paragraphs.

RESPONSE:

Plaintiff repeats and incorporates by this reference the General Objections and Objections to Definitions and Instruction above, as though set forth in full. Plaintiff further objects to this

Request – and to all other Requests herein – on the grounds that Defendant has served 217 Requests in this set of Requests for Production alone, and the content and number of these Requests are facially excessive, unduly burdensome, and harassing, and represent a misuse of the discovery process. 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 on the grounds that the Request purports to require Plaintiff to speculate as to what documents might relate to Defendant's own allegations. Plaintiff further objects to this Request on the grounds that it is overly broad and unduly burdensome taking into account the needs of the case, including because it seeks "all" documents. 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 seeks documents that are protected by the attorney-client privilege, work-product doctrine, or any other applicable privilege, immunity, or protection. Plaintiff further objects to this Request on the grounds that it seeks private or confidential documents. Plaintiff further objects to this Request on the grounds that it is duplicative of other discovery. Plaintiff further objects that the Request is unreasonably broad and vague and calls for a legal conclusion in that it seeks all documents "supporting, refuting, or otherwise related to" a statement. Plaintiff objects that Defendant has failed to describe reasonably identifiable categories of documents for production and instead has improperly attempted to shift the burden to Plaintiff to analyze what documents might be deemed to "support[], refut[e], or otherwise relat[e]" to a particular statement, which implicates the work product of counsel. Plaintiff further objects to this Request on the grounds that it seeks documents already in possession of Defendant and/or her attorneys, and/or is equally available to Defendant and/or her attorneys, and represents an improper attempt to shift the burden of

producing such documents to Plaintiff, where such statements were made in Defendant's own Declaration. Plaintiff further objects to the Request as being unduly cumulative and harassing.

84. Please produce all documents supporting, refuting, or otherwise relating to the "January 25, 2015, Tokyo, Japan" incident referenced in ¶ 13 of the Declaration of Ms. Heard, including all statements made in those paragraphs.

RESPONSE:

Plaintiff repeats and incorporates by this reference the General Objections and Objections to Definitions and Instruction above, as though set forth in full. Plaintiff further objects to this Request – and to all other Requests herein – on the grounds that Defendant has served 217 Requests in this set of Requests for Production alone, and the content and number of these Requests are facially excessive, unduly burdensome, and harassing, and represent a misuse of the discovery process. 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 on the grounds that the Request purports to require Plaintiff to speculate as to what documents might relate to Defendant's own allegations. Plaintiff further objects to this Request on the grounds that it is overly broad and unduly burdensome taking into account the needs of the case, including because it seeks "all" documents. 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 seeks documents that are protected by the attorney-client privilege, work-product doctrine, or any other applicable privilege, immunity, or protection. Plaintiff further objects to this Request on the grounds that it seeks private or confidential documents. Plaintiff further objects to this Request on the grounds that it is duplicative of other discovery. Plaintiff further objects that the Request is unreasonably broad and vague and calls for a legal conclusion in that it seeks all documents "supporting, refuting, or otherwise related to" a statement. Plaintiff objects that Defendant has failed to describe

reasonably identifiable categories of documents for production and instead has improperly attempted to shift the burden to Plaintiff to analyze what documents might be deemed to "support[], refut[e], or otherwise relat[e]" to a particular statement, which implicates the work product of counsel. Plaintiff further objects to this Request on the grounds that it seeks documents already in possession of Defendant and/or her attorneys, and/or is equally available to Defendant and/or her attorneys, and represents an improper attempt to shift the burden of producing such documents to Plaintiff, where such statements were made in Defendant's own Declaration. Plaintiff further objects to the Request as being unduly cumulative and harassing.

85. Please produce all documents supporting, refuting, or otherwise relating to the "March 2015, Australia" incident referenced in ¶¶ 14-18 of the Declaration of Ms. Heard, including all statements made in those paragraphs.

RESPONSE:

Plaintiff repeats and incorporates by this reference the General Objections and Objections to Definitions and Instruction above, as though set forth in full. Plaintiff further objects to this Request – and to all other Requests herein – on the grounds that Defendant has served 217 Requests in this set of Requests for Production alone, and the content and number of these Requests are facially excessive, unduly burdensome, and harassing, and represent a misuse of the discovery process. 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 on the grounds that the Request purports to require Plaintiff to speculate as to what documents might relate to Defendant's own allegations. Plaintiff further objects to this Request on the grounds that it is overly broad and unduly burdensome taking into account the needs of the case, including because it seeks "all" documents. 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 seeks documents that are protected

by the attorney-client privilege, work-product doctrine, or any other applicable privilege, immunity, or protection. Plaintiff further objects to this Request on the grounds that it seeks private or confidential documents. Plaintiff further objects to this Request on the grounds that it is duplicative of other discovery. Plaintiff further objects that the Request is unreasonably broad and vague and calls for a legal conclusion in that it seeks all documents "supporting, refuting, or otherwise related to" a statement. Plaintiff objects that Defendant has failed to describe reasonably identifiable categories of documents for production and instead has improperly attempted to shift the burden to Plaintiff to analyze what documents might be deemed to "support[], refut[e], or otherwise relat[e]" to a particular statement, which implicates the work product of counsel. Plaintiff further objects to this Request on the grounds that it seeks documents already in possession of Defendant and/or her attorneys, and/or is equally available to Defendant and/or her attorneys, and represents an improper attempt to shift the burden of producing such documents to Plaintiff, where such statements were made in Defendant's own Declaration. Plaintiff further objects to the Request as being unduly cumulative and harassing.

86. Please produce all documents supporting, refuting, or otherwise relating to the "March 2015, Los Angeles, California" incident referenced in ¶¶ 19-20 of the Declaration of Ms. Heard, including all statements made in those paragraphs.

RESPONSE:

Plaintiff repeats and incorporates by this reference the General Objections and Objections to Definitions and Instruction above, as though set forth in full. Plaintiff further objects to this Request – and to all other Requests herein – on the grounds that Defendant has served 217 Requests in this set of Requests for Production alone, and the content and number of these Requests are facially excessive, unduly burdensome, and harassing, and represent a misuse of the discovery process. 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 on the grounds that the Request purports to require Plaintiff to speculate as to what documents might relate to Defendant's own allegations. Plaintiff further objects to this Request on the grounds that it is overly broad and unduly burdensome taking into account the needs of the case, including because it seeks "all" documents. 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 seeks documents that are protected by the attorney-client privilege, work-product doctrine, or any other applicable privilege, immunity, or protection. Plaintiff further objects to this Request on the grounds that it seeks private or confidential documents. Plaintiff further objects to this Request on the grounds that it is duplicative of other discovery. Plaintiff further objects that the Request is unreasonably broad and vague and calls for a legal conclusion in that it seeks all documents "supporting, refuting, or otherwise related to" a statement. Plaintiff objects that Defendant has failed to describe reasonably identifiable categories of documents for production and instead has improperly attempted to shift the burden to Plaintiff to analyze what documents might be deemed to "support[], refut[e], or otherwise relat[e]" to a particular statement, which implicates the work product of counsel. Plaintiff further objects to this Request on the grounds that it seeks documents already in possession of Defendant and/or her attorneys, and/or is equally available to Defendant and/or her attorneys, and represents an improper attempt to shift the burden of producing such documents to Plaintiff, where such statements were made in Defendant's own Declaration. Plaintiff further objects to the Request as being unduly cumulative and harassing.

87. Please produce all documents supporting, refuting, or otherwise relating to the "August 2015, Thailand and Malaysia" incident referenced in ¶ 21 of the Declaration of Ms. Heard, including all statements made in those paragraphs.

RESPONSE:

Plaintiff repeats and incorporates by this reference the General Objections and Objections to Definitions and Instruction above, as though set forth in full. Plaintiff further objects to this Request – and to all other Requests herein – on the grounds that Defendant has served 217 Requests in this set of Requests for Production alone, and the content and number of these Requests are facially excessive, unduly burdensome, and harassing, and represent a misuse of the discovery process. 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 on the grounds that the Request purports to require Plaintiff to speculate as to what documents might relate to Defendant's own allegations. Plaintiff further objects to this Request on the grounds that it is overly broad and unduly burdensome taking into account the needs of the case, including because it seeks "all" documents. 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 seeks documents that are protected by the attorney-client privilege, work-product doctrine, or any other applicable privilege, immunity, or protection. Plaintiff further objects to this Request on the grounds that it seeks private or confidential documents. Plaintiff further objects to this Request on the grounds that it is duplicative of other discovery. Plaintiff further objects that the Request is unreasonably broad and vague and calls for a legal conclusion in that it seeks all documents "supporting, refuting, or otherwise related to" a statement. Plaintiff objects that Defendant has failed to describe reasonably identifiable categories of documents for production and instead has improperly attempted to shift the burden to Plaintiff to analyze what documents might be deemed to "support[], refut[e], or otherwise relat[e]" to a particular statement, which implicates the work product of counsel. Plaintiff further objects to this Request on the grounds that it seeks

documents already in possession of Defendant and/or her attorneys, and/or is equally available to Defendant and/or her attorneys, and represents an improper attempt to shift the burden of producing such documents to Plaintiff, where such statements were made in Defendant's own Declaration. Plaintiff further objects to the Request as being unduly cumulative and harassing.

88. Please produce all documents supporting, refuting, or otherwise relating to the "November 26, 2015, Los Angeles, California" incident referenced in ¶¶ 22 [sic] of the Declaration of Ms. Heard, including all statements made in those paragraphs.

RESPONSE:

Plaintiff repeats and incorporates by this reference the General Objections and Objections to Definitions and Instruction above, as though set forth in full. Plaintiff further objects to this Request – and to all other Requests herein – on the grounds that Defendant has served 217 Requests in this set of Requests for Production alone, and the content and number of these Requests are facially excessive, unduly burdensome, and harassing, and represent a misuse of the discovery process. 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 on the grounds that the Request purports to require Plaintiff to speculate as to what documents might relate to Defendant's own allegations. Plaintiff further objects to this Request on the grounds that it is overly broad and unduly burdensome taking into account the needs of the case, including because it seeks "all" documents. 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 seeks documents that are protected by the attorney-client privilege, work-product doctrine, or any other applicable privilege, immunity, or protection. Plaintiff further objects to this Request on the grounds that it seeks private or confidential documents. Plaintiff further objects to this Request on the grounds that it is duplicative of other discovery. Plaintiff further objects that the Request is unreasonably broad

and vague and calls for a legal conclusion in that it seeks all documents "supporting, refuting, or otherwise related to" a statement. Plaintiff objects that Defendant has failed to describe reasonably identifiable categories of documents for production and instead has improperly attempted to shift the burden to Plaintiff to analyze what documents might be deemed to "support[], refut[e], or otherwise relat[e]" to a particular statement, which implicates the work product of counsel. Plaintiff further objects to this Request on the grounds that it seeks documents already in possession of Defendant and/or her attorneys, and/or is equally available to Defendant and/or her attorneys, and represents an improper attempt to shift the burden of producing such documents to Plaintiff, where such statements were made in Defendant's own Declaration. Plaintiff further objects to the Request as being unduly cumulative and harassing.

89. Please produce all documents supporting, refuting, or otherwise relating to the "December 15, 2015, Los Angeles, California" incident referenced in ¶¶ 23-33 of the Declaration of Ms. Heard, including all statements made in those paragraphs.

RESPONSE:

Plaintiff repeats and incorporates by this reference the General Objections and Objections to Definitions and Instruction above, as though set forth in full. Plaintiff further objects to this Request – and to all other Requests herein – on the grounds that Defendant has served 217 Requests in this set of Requests for Production alone, and the content and number of these Requests are facially excessive, unduly burdensome, and harassing, and represent a misuse of the discovery process. 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 on the grounds that the Request purports to require Plaintiff to speculate as to what documents might relate to Defendant's own allegations. Plaintiff further objects to this Request on the grounds that it is overly broad and unduly burdensome taking into account the needs of the case, including because it seeks "all" documents. 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 seeks documents that are protected by the attorney-client privilege, work-product doctrine, or any other applicable privilege, immunity, or protection. Plaintiff further objects to this Request on the grounds that it seeks private or confidential documents. Plaintiff further objects to this Request on the grounds that it is duplicative of other discovery. Plaintiff further objects that the Request is unreasonably broad and vague and calls for a legal conclusion in that it seeks all documents "supporting, refuting, or otherwise related to" a statement. Plaintiff objects that Defendant has failed to describe reasonably identifiable categories of documents for production and instead has improperly attempted to shift the burden to Plaintiff to analyze what documents might be deemed to "support[], refut[e], or otherwise relat[e]" to a particular statement, which implicates the work product of counsel. Plaintiff further objects to this Request on the grounds that it seeks documents already in possession of Defendant and/or her attorneys, and/or is equally available to Defendant and/or her attorneys, and represents an improper attempt to shift the burden of producing such documents to Plaintiff, where such statements were made in Defendant's own Declaration. Plaintiff further objects to the Request as being unduly cumulative and harassing.

90. Please produce all documents supporting, refuting, or otherwise relating to the "April 21, 2016, Los Angeles, California" incident referenced in ¶¶ 34-35 of the Declaration of Ms. Heard, including all statements made in those paragraphs.

RESPONSE:

Plaintiff repeats and incorporates by this reference the General Objections and Objections to Definitions and Instruction above, as though set forth in full. Plaintiff further objects to this Request – and to all other Requests herein – on the grounds that Defendant has served 217 Requests in this set of Requests for Production alone, and the content and number of these Requests are facially excessive, unduly burdensome, and harassing, and represent a misuse of the

discovery process. 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 on the grounds that the Request purports to require Plaintiff to speculate as to what documents might relate to Defendant's own allegations. Plaintiff further objects to this Request on the grounds that it is overly broad and unduly burdensome taking into account the needs of the case, including because it seeks "all" documents. 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 seeks documents that are protected by the attorney-client privilege, work-product doctrine, or any other applicable privilege, immunity, or protection. Plaintiff further objects to this Request on the grounds that it seeks private or confidential documents. Plaintiff further objects to this Request on the grounds that it is duplicative of other discovery. Plaintiff further objects that the Request is unreasonably broad and vague and calls for a legal conclusion in that it seeks all documents "supporting, refuting, or otherwise related to" a statement. Plaintiff objects that Defendant has failed to describe reasonably identifiable categories of documents for production and instead has improperly attempted to shift the burden to Plaintiff to analyze what documents might be deemed to "support[], refut[e], or otherwise relat[e]" to a particular statement, which implicates the work product of counsel. Plaintiff further objects to this Request on the grounds that it seeks documents already in possession of Defendant and/or her attorneys, and/or is equally available to Defendant and/or her attorneys, and represents an improper attempt to shift the burden of producing such documents to Plaintiff, where such statements were made in Defendant's own Declaration. Plaintiff further objects to the Request as being unduly cumulative and harassing.

91. Please produce all documents supporting, refuting, or otherwise relating to the "May 21, 2016, Los Angeles, California" incident referenced in ¶¶ 36-42 of the Declaration of Ms. Heard, including all statements made in those paragraphs.

RESPONSE:

Plaintiff repeats and incorporates by this reference the General Objections and Objections to Definitions and Instruction above, as though set forth in full. Plaintiff further objects to this Request – and to all other Requests herein – on the grounds that Defendant has served 217 Requests in this set of Requests for Production alone, and the content and number of these Requests are facially excessive, unduly burdensome, and harassing, and represent a misuse of the discovery process. 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 on the grounds that the Request purports to require Plaintiff to speculate as to what documents might relate to Defendant's own allegations. Plaintiff further objects to this Request on the grounds that it is overly broad and unduly burdensome taking into account the needs of the case, including because it seeks "all" documents. 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 seeks documents that are protected by the attorney-client privilege, work-product doctrine, or any other applicable privilege, immunity, or protection. Plaintiff further objects to this Request on the grounds that it seeks private or confidential documents. Plaintiff further objects to this Request on the grounds that it is duplicative of other discovery. Plaintiff further objects that the Request is unreasonably broad and vague and calls for a legal conclusion in that it seeks all documents "supporting, refuting, or otherwise related to" a statement. Plaintiff objects that Defendant has failed to describe reasonably identifiable categories of documents for production and instead has improperly attempted to shift the burden to Plaintiff to analyze what documents might be deemed to

further objects to this Request on the grounds that it is overly broad and unduly burdensome taking into account the needs of the case, including because it seeks "all" documents. 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 seeks documents that are protected by the attorney-client privilege, work-product doctrine, or any other applicable privilege, immunity, or protection. Plaintiff further objects to this Request on the grounds that it seeks private or confidential documents. Plaintiff further objects to this Request on the grounds that it is duplicative of other discovery. Plaintiff further objects that the Request is unreasonably broad and vague and calls for a legal conclusion in that it seeks all documents "supporting, refuting, or otherwise related to" a statement. Plaintiff objects that Defendant has failed to describe reasonably identifiable categories of documents for production and instead has improperly attempted to shift the burden to Plaintiff to analyze what documents might be deemed to "support[], refut[e], or otherwise relat[e]" to a particular statement, which implicates the work product of counsel. Plaintiff further objects to this Request on the grounds that it seeks documents already in possession of Defendant and/or her attorneys, and/or is equally available to Defendant and/or her attorneys, and represents an improper attempt to shift the burden of producing such documents to Plaintiff, where such statements were made by Defendant. Plaintiff further objects to the Request as being unduly cumulative and harassing.

105. Please produce all documents supporting, refuting, or otherwise relating to the statements in ¶ 42 of Ms. Heard's Witness Statement.

RESPONSE:

Plaintiff repeats and incorporates by this reference the General Objections and Objections to Definitions and Instruction above, as though set forth in full. Plaintiff further objects to this Request – and to all other Requests herein – on the grounds that Defendant has served 217

Requests in this set of Requests for Production alone, and the content and number of these Requests are facially excessive, unduly burdensome, and harassing, and represent a misuse of the discovery process. 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 on the grounds that the Request purports to require Plaintiff to speculate as to what documents might relate to Defendant's own allegations. Plaintiff further objects to this Request on the grounds that it is overly broad and unduly burdensome taking into account the needs of the case, including because it seeks "all" documents. 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 seeks documents that are protected by the attorney-client privilege, work-product doctrine, or any other applicable privilege, immunity, or protection. Plaintiff further objects to this Request on the grounds that it seeks private or confidential documents. Plaintiff further objects to this Request on the grounds that it is duplicative of other discovery. Plaintiff further objects that the Request is unreasonably broad and vague and calls for a legal conclusion in that it seeks all documents "supporting, refuting, or otherwise related to" a statement. Plaintiff objects that Defendant has failed to describe reasonably identifiable categories of documents for production and instead has improperly attempted to shift the burden to Plaintiff to analyze what documents might be deemed to "support[], refut[e], or otherwise relat[e]" to a particular statement, which implicates the work product of counsel. Plaintiff further objects to this Request on the grounds that it seeks documents already in possession of Defendant and/or her attorneys, and/or is equally available to Defendant and/or her attorneys, and represents an improper attempt to shift the burden of

producing such documents to Plaintiff, where such statements were made by Defendant. Plaintiff further objects to the Request as being unduly cumulative and harassing.

106. Please produce all documents supporting, refuting, or otherwise relating to the "First violent incident, early 2013" referenced in ¶¶ 44-51 of Ms. Heard's Witness Statement, including all statements made in those paragraphs.

RESPONSE:

Plaintiff repeats and incorporates by this reference the General Objections and Objections to Definitions and Instruction above, as though set forth in full. Plaintiff further objects to this Request – and to all other Requests herein – on the grounds that Defendant has served 217 Requests in this set of Requests for Production alone, and the content and number of these Requests are facially excessive, unduly burdensome, and harassing, and represent a misuse of the discovery process. 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 on the grounds that the Request purports to require Plaintiff to speculate as to what documents might relate to Defendant's own allegations. Plaintiff further objects to this Request on the grounds that it is overly broad and unduly burdensome taking into account the needs of the case, including because it seeks "all" documents. 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 seeks documents that are protected by the attorney-client privilege, work-product doctrine, or any other applicable privilege, immunity, or protection. Plaintiff further objects to this Request on the grounds that it seeks private or confidential documents. Plaintiff further objects to this Request on the grounds that it is duplicative of other discovery. Plaintiff further objects that the Request is unreasonably broad and vague and calls for a legal conclusion in that it seeks all documents "supporting, refuting, or otherwise related to" a statement. Plaintiff objects that Defendant has failed to describe

reasonably identifiable categories of documents for production and instead has improperly attempted to shift the burden to Plaintiff to analyze what documents might be deemed to "support[], refut[e], or otherwise relat[e]" to a particular statement, which implicates the work product of counsel. Plaintiff further objects to this Request on the grounds that it seeks documents already in possession of Defendant and/or her attorneys, and/or is equally available to Defendant and/or her attorneys, and represents an improper attempt to shift the burden of producing such documents to Plaintiff, where such statements were made by Defendant. Plaintiff further objects to the Request as being unduly cumulative and harassing.

107. Please produce all documents supporting, refuting, or otherwise relating to the "Painting incident, March 2013" referenced in ¶¶ 52-64 of Ms. Heard's Witness Statement, including all statements made in those paragraphs.

RESPONSE:

Plaintiff repeats and incorporates by this reference the General Objections and Objections to Definitions and Instruction above, as though set forth in full. Plaintiff further objects to this Request – and to all other Requests herein – on the grounds that Defendant has served 217 Requests in this set of Requests for Production alone, and the content and number of these Requests are facially excessive, unduly burdensome, and harassing, and represent a misuse of the discovery process. 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 on the grounds that the Request purports to require Plaintiff to speculate as to what documents might relate to Defendant's own allegations. Plaintiff further objects to this Request on the grounds that it is overly broad and unduly burdensome taking into account the needs of the case, including because it seeks "all" documents. 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 seeks documents that are protected

by the attorney-client privilege, work-product doctrine, or any other applicable privilege, immunity, or protection. Plaintiff further objects to this Request on the grounds that it seeks private or confidential documents. Plaintiff further objects to this Request on the grounds that it is duplicative of other discovery. Plaintiff further objects that the Request is unreasonably broad and vague and calls for a legal conclusion in that it seeks all documents "supporting, refuting, or otherwise related to" a statement. Plaintiff objects that Defendant has failed to describe reasonably identifiable categories of documents for production and instead has improperly attempted to shift the burden to Plaintiff to analyze what documents might be deemed to "support[], refut[e], or otherwise relat[e]" to a particular statement, which implicates the work product of counsel. Plaintiff further objects to this Request on the grounds that it seeks documents already in possession of Defendant and/or her attorneys, and/or is equally available to Defendant and/or her attorneys, and represents an improper attempt to shift the burden of producing such documents to Plaintiff, where such statements were made by Defendant. Plaintiff further objects to the Request as being unduly cumulative and harassing.

108. Please produce all documents supporting, refuting, or otherwise relating to the "Boston-LA flight, Mat 24 2014" incident referenced in ¶¶ 65-83 of Ms. Heard's Witness Statement, including all statements made in those paragraphs.

RESPONSE:

Plaintiff repeats and incorporates by this reference the General Objections and Objections to Definitions and Instruction above, as though set forth in full. Plaintiff further objects to this Request – and to all other Requests herein – on the grounds that Defendant has served 217 Requests in this set of Requests for Production alone, and the content and number of these Requests are facially excessive, unduly burdensome, and harassing, and represent a misuse of the discovery process. 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 on the grounds that the Request purports to require Plaintiff to speculate as to what documents might relate to Defendant's own allegations. Plaintiff further objects to this Request on the grounds that it is overly broad and unduly burdensome taking into account the needs of the case, including because it seeks "all" documents. 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 seeks documents that are protected by the attorney-client privilege, work-product doctrine, or any other applicable privilege, immunity, or protection. Plaintiff further objects to this Request on the grounds that it seeks private or confidential documents. Plaintiff further objects to this Request on the grounds that it is duplicative of other discovery. Plaintiff further objects that the Request is unreasonably broad and vague and calls for a legal conclusion in that it seeks all documents "supporting, refuting, or otherwise related to" a statement. Plaintiff objects that Defendant has failed to describe reasonably identifiable categories of documents for production and instead has improperly attempted to shift the burden to Plaintiff to analyze what documents might be deemed to "support[], refut[e], or otherwise relat[e]" to a particular statement, which implicates the work product of counsel. Plaintiff further objects to this Request on the grounds that it seeks documents already in possession of Defendant and/or her attorneys, and/or is equally available to Defendant and/or her attorneys, and represents an improper attempt to shift the burden of producing such documents to Plaintiff, where such statements were made by Defendant. Plaintiff further objects to the Request as being unduly cumulative and harassing.

109. Please produce all documents supporting, refuting, or otherwise relating to the "Bahamas, August 2014" incident referenced in ¶¶ 84-92 of Ms. Heard's Witness Statement, including all statements made in those paragraphs.

RESPONSE:

Plaintiff repeats and incorporates by this reference the General Objections and Objections to Definitions and Instruction above, as though set forth in full. Plaintiff further objects to this Request – and to all other Requests herein – on the grounds that Defendant has served 217 Requests in this set of Requests for Production alone, and the content and number of these Requests are facially excessive, unduly burdensome, and harassing, and represent a misuse of the discovery process. 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 on the grounds that the Request purports to require Plaintiff to speculate as to what documents might relate to Defendant's own allegations. Plaintiff further objects to this Request on the grounds that it is overly broad and unduly burdensome taking into account the needs of the case, including because it seeks "all" documents. 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 seeks documents that are protected by the attorney-client privilege, work-product doctrine, or any other applicable privilege, immunity, or protection. Plaintiff further objects to this Request on the grounds that it seeks private or confidential documents. Plaintiff further objects to this Request on the grounds that it is duplicative of other discovery. Plaintiff further objects that the Request is unreasonably broad and vague and calls for a legal conclusion in that it seeks all documents "supporting, refuting, or otherwise related to" a statement. Plaintiff objects that Defendant has failed to describe reasonably identifiable categories of documents for production and instead has improperly attempted to shift the burden to Plaintiff to analyze what documents might be deemed to "support[], refut[e], or otherwise relat[e]" to a particular statement, which implicates the work product of counsel. Plaintiff further objects to this Request on the grounds that it seeks

documents already in possession of Defendant and/or her attorneys, and/or is equally available to Defendant and/or her attorneys, and represents an improper attempt to shift the burden of producing such documents to Plaintiff, where such statements were made by Defendant. Plaintiff further objects to the Request as being unduly cumulative and harassing.

110. Please produce all documents supporting, refuting, or otherwise relating to the "17 December 2014" incident referenced in ¶ 93 of Ms. Heard's Witness Statement, including all statements made in those paragraphs.

RESPONSE:

Plaintiff repeats and incorporates by this reference the General Objections and Objections to Definitions and Instruction above, as though set forth in full. Plaintiff further objects to this Request – and to all other Requests herein – on the grounds that Defendant has served 217 Requests in this set of Requests for Production alone, and the content and number of these Requests are facially excessive, unduly burdensome, and harassing, and represent a misuse of the discovery process. 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 on the grounds that the Request purports to require Plaintiff to speculate as to what documents might relate to Defendant's own allegations. Plaintiff further objects to this Request on the grounds that it is overly broad and unduly burdensome taking into account the needs of the case, including because it seeks "all" documents. 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 seeks documents that are protected by the attorney-client privilege, work-product doctrine, or any other applicable privilege, immunity, or protection. Plaintiff further objects to this Request on the grounds that it seeks private or confidential documents. Plaintiff further objects to this Request on the grounds that it is duplicative of other discovery. Plaintiff further objects that the Request is unreasonably broad

and vague and calls for a legal conclusion in that it seeks all documents "supporting, refuting, or otherwise related to" a statement. Plaintiff objects that Defendant has failed to describe reasonably identifiable categories of documents for production and instead has improperly attempted to shift the burden to Plaintiff to analyze what documents might be deemed to "support[], refut[e], or otherwise relat[e]" to a particular statement, which implicates the work product of counsel. Plaintiff further objects to this Request on the grounds that it seeks documents already in possession of Defendant and/or her attorneys, and/or is equally available to Defendant and/or her attorneys, and represents an improper attempt to shift the burden of producing such documents to Plaintiff, where such statements were made by Defendant. Plaintiff further objects to the Request as being unduly cumulative and harassing.

111. Please produce all documents supporting, refuting, or otherwise relating to the "Tokyo, January 2015" incident referenced in ¶¶ 94-96 of Ms. Heard's Witness Statement, including all statements made in those paragraphs.

RESPONSE:

Plaintiff repeats and incorporates by this reference the General Objections and Objections to Definitions and Instruction above, as though set forth in full. Plaintiff further objects to this Request – and to all other Requests herein – on the grounds that Defendant has served 217 Requests in this set of Requests for Production alone, and the content and number of these Requests are facially excessive, unduly burdensome, and harassing, and represent a misuse of the discovery process. 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 on the grounds that the Request purports to require Plaintiff to speculate as to what documents might relate to Defendant's own allegations. Plaintiff further objects to this Request on the grounds that it is overly broad and unduly burdensome taking into account the needs of the case, including because it seeks "all" documents. Plaintiff

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112. Please produce all documents supporting, refuting, or otherwise relating to the "Wedding" incident referenced in ¶ 97 of Ms. Heard's Witness Statement, including all statements made in those paragraphs.

RESPONSE:

Plaintiff repeats and incorporates by this reference the General Objections and Objections to Definitions and Instruction above, as though set forth in full. Plaintiff further objects to this Request – and to all other Requests herein – on the grounds that Defendant has served 217 Requests in this set of Requests for Production alone, and the content and number of these Requests are facially excessive, unduly burdensome, and harassing, and represent a misuse of the

discovery process. 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 on the grounds that the Request purports to require Plaintiff to speculate as to what documents might relate to Defendant's own allegations. Plaintiff further objects to this Request on the grounds that it is overly broad and unduly burdensome taking into account the needs of the case, including because it seeks "all" documents. 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 seeks documents that are protected by the attorney-client privilege, work-product doctrine, or any other applicable privilege, immunity, or protection. Plaintiff further objects to this Request on the grounds that it seeks private or confidential documents. Plaintiff further objects to this Request on the grounds that it is duplicative of other discovery. Plaintiff further objects that the Request is unreasonably broad and vague and calls for a legal conclusion in that it seeks all documents "supporting, refuting, or otherwise related to" a statement. Plaintiff objects that Defendant has failed to describe reasonably identifiable categories of documents for production and instead has improperly attempted to shift the burden to Plaintiff to analyze what documents might be deemed to "support[], refut[e], or otherwise relat[e]" to a particular statement, which implicates the work product of counsel. Plaintiff further objects to this Request on the grounds that it seeks documents already in possession of Defendant and/or her attorneys, and/or is equally available to Defendant and/or her attorneys, and represents an improper attempt to shift the burden of producing such documents to Plaintiff, where such statements were made by Defendant. Plaintiff further objects to the Request as being unduly cumulative and harassing.

113. Please produce all documents supporting, refuting, or otherwise relating to the "Australia, March 2015" incident referenced in ¶¶ 99-130 of Ms. Heard's Witness Statement, including all statements made in those paragraphs.

RESPONSE:

Plaintiff repeats and incorporates by this reference the General Objections and Objections to Definitions and Instruction above, as though set forth in full. Plaintiff further objects to this Request – and to all other Requests herein – on the grounds that Defendant has served 217 Requests in this set of Requests for Production alone, and the content and number of these Requests are facially excessive, unduly burdensome, and harassing, and represent a misuse of the discovery process. 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 on the grounds that the Request purports to require Plaintiff to speculate as to what documents might relate to Defendant's own allegations. Plaintiff further objects to this Request on the grounds that it is overly broad and unduly burdensome taking into account the needs of the case, including because it seeks "all" documents. 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 seeks documents that are protected by the attorney-client privilege, work-product doctrine, or any other applicable privilege, immunity, or protection. Plaintiff further objects to this Request on the grounds that it seeks private or confidential documents. Plaintiff further objects to this Request on the grounds that it is duplicative of other discovery. Plaintiff further objects that the Request is unreasonably broad and vague and calls for a legal conclusion in that it seeks all documents "supporting, refuting, or otherwise related to" a statement. Plaintiff objects that Defendant has failed to describe reasonably identifiable categories of documents for production and instead has improperly attempted to shift the burden to Plaintiff to analyze what documents might be deemed to

"support[], refut[e], or otherwise relat[e]" to a particular statement, which implicates the work product of counsel. Plaintiff further objects to this Request on the grounds that it seeks documents already in possession of Defendant and/or her attorneys, and/or is equally available to Defendant and/or her attorneys, and represents an improper attempt to shift the burden of producing such documents to Plaintiff, where such statements were made by Defendant. Plaintiff further objects to the Request as being unduly cumulative and harassing.

114. Please produce all documents supporting, refuting, or otherwise relating to the "Staircase incident, March 2015" referenced in ¶¶ 131-134 of Ms. Heard's Witness Statement, including all statements made in those paragraphs.

RESPONSE:

Plaintiff repeats and incorporates by this reference the General Objections and Objections to Definitions and Instruction above, as though set forth in full. Plaintiff further objects to this Request – and to all other Requests herein – on the grounds that Defendant has served 217 Requests in this set of Requests for Production alone, and the content and number of these Requests are facially excessive, unduly burdensome, and harassing, and represent a misuse of the discovery process. 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 on the grounds that the Request purports to require Plaintiff to speculate as to what documents might relate to Defendant's own allegations. Plaintiff further objects to this Request on the grounds that it is overly broad and unduly burdensome taking into account the needs of the case, including because it seeks "all" documents. 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 seeks documents that are protected by the attorney-client privilege, work-product doctrine, or any other applicable privilege, immunity, or protection. Plaintiff further objects to this Request on the grounds that it seeks

private or confidential documents. Plaintiff further objects to this Request on the grounds that it is duplicative of other discovery. Plaintiff further objects that the Request is unreasonably broad and vague and calls for a legal conclusion in that it seeks all documents "supporting, refuting, or otherwise related to" a statement. Plaintiff objects that Defendant has failed to describe reasonably identifiable categories of documents for production and instead has improperly attempted to shift the burden to Plaintiff to analyze what documents might be deemed to "support[], refut[e], or otherwise relat[e]" to a particular statement, which implicates the work product of counsel. Plaintiff further objects to this Request on the grounds that it seeks documents already in possession of Defendant and/or her attorneys, and/or is equally available to Defendant and/or her attorneys, and represents an improper attempt to shift the burden of producing such documents to Plaintiff, where such statements were made by Defendant. Plaintiff further objects to the Request as being unduly cumulative and harassing.

115. Please produce all documents supporting, refuting, or otherwise relating to the "Malaysia train, August 2015" incident referenced in ¶ 135 of Ms. Heard's Witness Statement, including all statements made in those paragraphs.

RESPONSE:

Plaintiff repeats and incorporates by this reference the General Objections and Objections to Definitions and Instruction above, as though set forth in full. Plaintiff further objects to this Request – and to all other Requests herein – on the grounds that Defendant has served 217 Requests in this set of Requests for Production alone, and the content and number of these Requests are facially excessive, unduly burdensome, and harassing, and represent a misuse of the discovery process. 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 on the grounds that the Request purports to require Plaintiff to speculate as to what documents might relate to Defendant's own allegations. Plaintiff

further objects to this Request on the grounds that it is overly broad and unduly burdensome taking into account the needs of the case, including because it seeks "all" documents. 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 seeks documents that are protected by the attorney-client privilege, work-product doctrine, or any other applicable privilege, immunity, or protection. Plaintiff further objects to this Request on the grounds that it seeks private or confidential documents. Plaintiff further objects to this Request on the grounds that it is duplicative of other discovery. Plaintiff further objects that the Request is unreasonably broad and vague and calls for a legal conclusion in that it seeks all documents "supporting, refuting, or otherwise related to" a statement. Plaintiff objects that Defendant has failed to describe reasonably identifiable categories of documents for production and instead has improperly attempted to shift the burden to Plaintiff to analyze what documents might be deemed to "support[], refut[e], or otherwise relat[e]" to a particular statement, which implicates the work product of counsel. Plaintiff further objects to this Request on the grounds that it seeks documents already in possession of Defendant and/or her attorneys, and/or is equally available to Defendant and/or her attorneys, and represents an improper attempt to shift the burden of producing such documents to Plaintiff, where such statements were made by Defendant. Plaintiff further objects to the Request as being unduly cumulative and harassing.

116. Please produce all documents supporting, refuting, or otherwise relating to the "Los Angeles, November 2015" incident referenced in ¶ 136 of Ms. Heard's Witness Statement, including all statements made in those paragraphs.

RESPONSE:

Plaintiff repeats and incorporates by this reference the General Objections and Objections to Definitions and Instruction above, as though set forth in full. Plaintiff further objects to this Request – and to all other Requests herein – on the grounds that Defendant has served 217

Requests in this set of Requests for Production alone, and the content and number of these Requests are facially excessive, unduly burdensome, and harassing, and represent a misuse of the discovery process. 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 on the grounds that the Request purports to require Plaintiff to speculate as to what documents might relate to Defendant's own allegations. Plaintiff further objects to this Request on the grounds that it is overly broad and unduly burdensome taking into account the needs of the case, including because it seeks "all" documents. 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 seeks documents that are protected by the attorney-client privilege, work-product doctrine, or any other applicable privilege, immunity, or protection. Plaintiff further objects to this Request on the grounds that it seeks private or confidential documents. Plaintiff further objects to this Request on the grounds that it is duplicative of other discovery. Plaintiff further objects that the Request is unreasonably broad and vague and calls for a legal conclusion in that it seeks all documents "supporting, refuting, or otherwise related to" a statement. Plaintiff objects that Defendant has failed to describe reasonably identifiable categories of documents for production and instead has improperly attempted to shift the burden to Plaintiff to analyze what documents might be deemed to "support[], refut[e], or otherwise relat[e]" to a particular statement, which implicates the work product of counsel. Plaintiff further objects to this Request on the grounds that it seeks documents already in possession of Defendant and/or her attorneys, and/or is equally available to Defendant and/or her attorneys, and represents an improper attempt to shift the burden of

producing such documents to Plaintiff, where such statements were made by Defendant. Plaintiff further objects to the Request as being unduly cumulative and harassing.

117. Please produce all documents supporting, refuting, or otherwise relating to the "Los Angeles, December 2015" incident referenced in ¶¶ 137-147 of Ms. Heard's Witness Statement, including all statements made in those paragraphs.

RESPONSE:

Plaintiff repeats and incorporates by this reference the General Objections and Objections to Definitions and Instruction above, as though set forth in full. Plaintiff further objects to this Request – and to all other Requests herein – on the grounds that Defendant has served 217 Requests in this set of Requests for Production alone, and the content and number of these Requests are facially excessive, unduly burdensome, and harassing, and represent a misuse of the discovery process. 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 on the grounds that the Request purports to require Plaintiff to speculate as to what documents might relate to Defendant's own allegations. Plaintiff further objects to this Request on the grounds that it is overly broad and unduly burdensome taking into account the needs of the case, including because it seeks "all" documents. 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 seeks documents that are protected by the attorney-client privilege, work-product doctrine, or any other applicable privilege, immunity, or protection. Plaintiff further objects to this Request on the grounds that it seeks private or confidential documents. Plaintiff further objects to this Request on the grounds that it is duplicative of other discovery. Plaintiff further objects that the Request is unreasonably broad and vague and calls for a legal conclusion in that it seeks all documents "supporting, refuting, or otherwise related to" a statement. Plaintiff objects that Defendant has failed to describe

reasonably identifiable categories of documents for production and instead has improperly attempted to shift the burden to Plaintiff to analyze what documents might be deemed to "support[], refut[e], or otherwise relat[e]" to a particular statement, which implicates the work product of counsel. Plaintiff further objects to this Request on the grounds that it seeks documents already in possession of Defendant and/or her attorneys, and/or is equally available to Defendant and/or her attorneys, and represents an improper attempt to shift the burden of producing such documents to Plaintiff, where such statements were made by Defendant. Plaintiff further objects to the Request as being unduly cumulative and harassing.

118. Please produce all documents supporting, refuting, or otherwise relating to the "Birthday party, April 2016" incident referenced in ¶¶ 148-154 of Ms. Heard's Witness Statement, including all statements made in those paragraphs.

RESPONSE:

Plaintiff repeats and incorporates by this reference the General Objections and Objections to Definitions and Instruction above, as though set forth in full. Plaintiff further objects to this Request – and to all other Requests herein – on the grounds that Defendant has served 217 Requests in this set of Requests for Production alone, and the content and number of these Requests are facially excessive, unduly burdensome, and harassing, and represent a misuse of the discovery process. 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 on the grounds that the Request purports to require Plaintiff to speculate as to what documents might relate to Defendant's own allegations. Plaintiff further objects to this Request on the grounds that it is overly broad and unduly burdensome taking into account the needs of the case, including because it seeks "all" documents. 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 seeks documents that are protected

by the attorney-client privilege, work-product doctrine, or any other applicable privilege, immunity, or protection. Plaintiff further objects to this Request on the grounds that it seeks private or confidential documents. Plaintiff further objects to this Request on the grounds that it is duplicative of other discovery. Plaintiff further objects that the Request is unreasonably broad and vague and calls for a legal conclusion in that it seeks all documents "supporting, refuting, or otherwise related to" a statement. Plaintiff objects that Defendant has failed to describe reasonably identifiable categories of documents for production and instead has improperly attempted to shift the burden to Plaintiff to analyze what documents might be deemed to "support[], refut[e], or otherwise relat[e]" to a particular statement, which implicates the work product of counsel. Plaintiff further objects to this Request on the grounds that it seeks documents already in possession of Defendant and/or her attorneys, and/or is equally available to Defendant and/or her attorneys, and represents an improper attempt to shift the burden of producing such documents to Plaintiff, where such statements were made by Defendant. Plaintiff further objects to the Request as being unduly cumulative and harassing.

119. Please produce all documents supporting, refuting, or otherwise relating to the "Los Angeles, May 21, 2016" incident referenced in ¶¶ 155-172 of Ms. Heard's Witness Statement, including all statements made in those paragraphs.

RESPONSE:

Plaintiff repeats and incorporates by this reference the General Objections and Objections to Definitions and Instruction above, as though set forth in full. Plaintiff further objects to this Request – and to all other Requests herein – on the grounds that Defendant has served 217 Requests in this set of Requests for Production alone, and the content and number of these Requests are facially excessive, unduly burdensome, and harassing, and represent a misuse of the discovery process. 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 on the grounds that the Request purports to require Plaintiff to speculate as to what documents might relate to Defendant's own allegations. Plaintiff further objects to this Request on the grounds that it is overly broad and unduly burdensome taking into account the needs of the case, including because it seeks "all" documents. 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 seeks documents that are protected by the attorney-client privilege, work-product doctrine, or any other applicable privilege, immunity, or protection. Plaintiff further objects to this Request on the grounds that it seeks private or confidential documents. Plaintiff further objects to this Request on the grounds that it is duplicative of other discovery. Plaintiff further objects that the Request is unreasonably broad and vague and calls for a legal conclusion in that it seeks all documents "supporting, refuting, or otherwise related to" a statement. Plaintiff objects that Defendant has failed to describe reasonably identifiable categories of documents for production and instead has improperly attempted to shift the burden to Plaintiff to analyze what documents might be deemed to "support[], refut[e], or otherwise relat[e]" to a particular statement, which implicates the work product of counsel. Plaintiff further objects to this Request on the grounds that it seeks documents already in possession of Defendant and/or her attorneys, and/or is equally available to Defendant and/or her attorneys, and represents an improper attempt to shift the burden of producing such documents to Plaintiff, where such statements were made by Defendant. Plaintiff further objects to the Request as being unduly cumulative and harassing.

120. Please produce all documents supporting, refuting, or otherwise relating to the statements in ¶ 174 of Ms. Heard's Witness Statement.

January 11, 2022. Plaintiff further objects that the Request is patently overbroad and not reasonably particularized.

Dated: December 20, 2021

Respectfully submitted,

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

CERTIFICATE OF SERVICE

I hereby certify that on this 20th day of December 2021, I caused copies of the foregoing to be served via email (per written agreement between the Parties) on the following:

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Benjamin G. Chew

Benjamin G. Chew (VSB #29113)

V I R G I N I A :

IN THE CIRCUIT COURT OF FAIRFAX COUNTY, VIRGINIA

JOHN C. DEPP, II	:	
	:	
Plaintiff and Counterclaim Defendant,	:	
	:	
v.	:	
	:	
AMBER LAURA HEARD,	:	Civil Action No.: CL-2019-0002911
	:	
Defendant and Counterclaim Plaintiff.	:	
	:	

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

Pursuant to Rule 4:9 of the Rules of the Supreme Court of Virginia, Plaintiff and Counterclaim Defendant John C. Depp, II ("Plaintiff" and/or "Mr. Depp"), by and through his undersigned counsel, hereby responds and objects to Defendant and Counterclaim Plaintiff Amber Laura Heard's ("Defendant" and/or "Ms. Heard") Fourteenth Set of Requests for Production of Documents (each, a "Request" and collectively, the "Requests"), dated November 8, 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

software and version of the software used to create the forensic image; d) the make/type of write-blocker used to create the forensic image; e) whether an uncompressed write-blocked forensic image was extracted; f) whether a hash verification was completed for each file and for the forensic image as a whole; and g) a list of all photographs, text messages, emails, and video/audio recordings contained in the image by BATES stamp if produced, or in list form if not yet produced.

(ii) The term "Inventory" in relation to a mobile device (including Cell Phones and Tablets) refers to a forensic image sufficient to identify: a) the mobile device by manufacturer, make, model, and serial number; b) the type of extraction performed (e.g. logical, advanced logical, Checkm8/checkra1n extraction, physical extraction if jail-broken, etc.); c) the software used in taking the forensic image; d) whether a jailbreak method was used in the extraction process; e) the operating system in use on the mobile device at the time it was imaged (e.g. iOS); and f) a list of all photographs, text messages, emails, and video/audio recordings contained in the image by BATES stamp if produced, or in list form if not yet produced.

(iii) The term "Inventory" in relation to a "cloud account" or "iCloud" refers to a forensic image of any cloud accounts sufficient to identify: a) the type of cloud account and company hosting the data on the cloud account; b) the type of forensic image taken of the cloud account; c) the software used in taking the forensic image (e.g. Oxygen, Cellebrite, etc.); d) a list of all photographs, text messages, emails, and video/audio recordings contained in the image by BATES stamp if produced, and in list form if not yet produced; and e) whether a forensic analysis was conducted and, if so, what software was used.

RESPONSE: Plaintiff objects to this as overbroad, unduly burdensome and harassing. Plaintiff further objects to this on the grounds that it exceeds the obligations applicable to discovery responses under Virginia law and would require the generation of unnecessary documents, which are not legitimately at issue. Plaintiff further objects on grounds of privilege and privacy.

REQUESTS

1. Please produce all documents supporting, refuting, or otherwise relating to Mr. Depp's statement to Christian Carino in the audio recording produced as DEPP8296 that "have gotten emails from every fucking studio fucking head from every motherfucker, I didn't do a thing. 'I'm sorry you're going through this. I'm so sorry.' Clearly she's out of her fucking mind. She is viewed as out of her fucking mind across the globe."

RESPONSE:

Plaintiff repeats and incorporates by this reference the General Objections and Objections to Definitions and Instruction above, as though set forth in full. Plaintiff further objects to this Request on the grounds that it fails to reasonably particularize the categories of documents sought. Plaintiff further objects to this Request on the grounds that it is vague, ambiguous, and overbroad, including because of its use of the phrase "supporting, refuting, or otherwise relating." 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 is overly broad and unduly burdensome taking into account the needs of the case. Plaintiff further objects to this Request as harassing because it seeks information unrelated to the subject matter of this case. Plaintiff further objects to this Request on the grounds that it seeks confidential, proprietary, and private personal and/or business information of Plaintiff and/or third parties to this litigation, which is not subject to discovery in this action. Plaintiff further objects to this Request on the grounds that it seeks documents protected by the attorney-client privilege, work-product doctrine, and/or any other applicable privilege, immunity, or protection. Plaintiff further objects to this request on the grounds that it seeks documents that belong to or are in possession of third parties, and/or are not within Plaintiff's possession, custody, or control. Plaintiff further objects to this Request on the grounds that it seeks documents that are irrelevant and appears calculated to harass.

2. Please produce all documents supporting, refuting, or otherwise relating to Mr. Depp's statement to Christian Carino in the audio recording produced as DEPP8296 that "There ain't no motherfucker in this business going to hire her."

RESPONSE:

Plaintiff repeats and incorporates by this reference the General Objections and Objections to Definitions and Instruction above, as though set forth in full. Plaintiff further objects to this

Request on the grounds that it fails to reasonably particularize the categories of documents sought. Plaintiff further objects to this Request on the grounds that it is vague, ambiguous, and overbroad, including because of its use of the phrase "supporting, refuting, or otherwise relating." 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 is overly broad and unduly burdensome taking into account the needs of the case. Plaintiff further objects to this Request as harassing because it seeks information unrelated to the subject matter of this case. Plaintiff further objects to this Request on the grounds that it seeks confidential, proprietary, and private personal and/or business information of Plaintiff and/or third parties to this litigation, which is not subject to discovery in this action. Plaintiff further objects to this Request on the grounds that it seeks documents protected by the attorney-client privilege, work-product doctrine, and/or any other applicable privilege, immunity, or protection. Plaintiff further objects to this request on the grounds that it seeks documents that belong to or are in possession of third parties, and/or are not within Plaintiff's possession, custody, or control. Plaintiff further objects to this Request on the grounds that it seeks documents that are irrelevant and appears calculated to harass.

3. Please produce all documents supporting, refuting, or otherwise relating to Mr. Depp's statement to Christian Carino in the audio recording produced as DEPP8296 that "Oh, she's ruined. For sure. She did that herself. In terms of the business, she's a wrap."

RESPONSE:

Plaintiff repeats and incorporates by this reference the General Objections and Objections to Definitions and Instruction above, as though set forth in full. Plaintiff further objects to this Request on the grounds that it fails to reasonably particularize the categories of documents sought. Plaintiff further objects to this Request on the grounds that it is vague, ambiguous, and overbroad, including because of its use of the phrase "supporting, refuting, or otherwise

relating." 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 is overly broad and unduly burdensome taking into account the needs of the case. Plaintiff further objects to this Request as harassing because it seeks information unrelated to the subject matter of this case. Plaintiff further objects to this Request on the grounds that it seeks confidential, proprietary, and private personal and/or business information of Plaintiff and/or third parties to this litigation, which is not subject to discovery in this action. Plaintiff further objects to this Request on the grounds that it seeks documents protected by the attorney-client privilege, work-product doctrine, and/or any other applicable privilege, immunity, or protection. Plaintiff further objects to this request on the grounds that it seeks documents that belong to or are in possession of third parties, and/or are not within Plaintiff's possession, custody, or control. Plaintiff further objects to this Request on the grounds that it seeks documents that are irrelevant and appears calculated to harass.

4. Please produce an Inventory of the iPhone that Mr. Depp confirmed under penalty of perjury is in his possession, custody, and control and contains ESI that relates to the claims or defenses in this case (or is reasonably likely to lead to the discovery of admissible evidence).

RESPONSE:

Plaintiff repeats and incorporates by this reference the General Objections and Objections to Definitions and Instruction above, as though set forth in full. Plaintiff further objects that the Request represents an improper attempt to impose on Plaintiff discovery obligations beyond the scope of legitimate discovery, and seeks to impose an arbitrary mutuality on Plaintiff that has already been rejected by the Court, since the authenticity and veracity of devices in Plaintiff's possession are not at issue. Plaintiff further objects to this Request on the grounds that it lacks reasonable particularity. Plaintiff further objects to this Request on the grounds that it is vague,

the subject matter of this case. Plaintiff further objects to this Request on the grounds that it seeks confidential, proprietary, and private personal and/or business information of Plaintiff and/or third parties to this litigation, which is not subject to discovery in this action. Plaintiff further objects to this Request on the grounds that it seeks documents or information protected by the attorney-client privilege, work-product doctrine, and/or any other applicable privilege, immunity, or protection. Plaintiff further objects to this request on the grounds and to the extent that it seeks documents or information that belong to or are in possession of third parties, and/or do not belong to Plaintiff. Plaintiff further objects to this Request on the grounds that it seeks documents or information that are irrelevant and appears calculated to harass. Plaintiff further objects that the Request is vague and ambiguous. Plaintiff further objects to the Request on the grounds that it represents an unreasonable intrusion on the privacy and other rights of Plaintiff and third parties to this litigation.

13. Please produce all communications between Mr. Depp (or any of Mr. Depp's agents or employees on his behalf) and any journalist, newspaper, publication (including but not limited to The Daily Mail) referring, reflecting, or otherwise relating to any audio or video recordings (or partial recordings) of Mr. Depp or Ms. Heard.

RESPONSE:

Plaintiff repeats and incorporates by this reference the General Objections and Objections to Definitions and Instruction above, as though set forth in full. Plaintiff further objects to this Request on the grounds that it fails to reasonably particularize the categories of documents sought. Plaintiff further objects to this Request on the grounds that it is vague, ambiguous, and overbroad, including because of its use of the phrase "referring, reflecting, or otherwise relating." 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 is overly broad and unduly

burdensome taking into account the needs of the case. Plaintiff further objects to this Request as harassing because it seeks information unrelated to the subject matter of this case. Plaintiff further objects to this Request on the grounds that it seeks confidential, proprietary, and private personal and/or business information of Plaintiff and/or third parties to this litigation, which is not subject to discovery in this action. Plaintiff further objects to this Request on the grounds that it seeks documents protected by the attorney-client privilege, work-product doctrine, and/or any other applicable privilege, immunity, or protection. Plaintiff further objects to this request on the grounds that it seeks documents that belong to or are in possession of third parties, and/or are not within Plaintiff's possession, custody, or control. Plaintiff further objects to this Request on the grounds that it seeks documents that are irrelevant and appears calculated to harass.

14. Please produce all documents and communications referring, reflecting, or otherwise relating to any purported investigation of Ms. Heard in Australia, including but not limited to all communications sent or received between Mr. Depp (or any of Mr. Depp's agents or employees on his behalf) and any journalist, newspaper, or publication.

RESPONSE:

Plaintiff repeats and incorporates by this reference the General Objections and Objections to Definitions and Instruction above, as though set forth in full. Plaintiff further objects to this Request on the grounds that it fails to reasonably particularize the categories of documents sought. Plaintiff further objects to this Request on the grounds that it is vague, ambiguous, and overbroad, including because of its use of the phrase "referring, reflecting, or otherwise relating." 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 is overly broad and unduly burdensome taking into account the needs of the case. Plaintiff further objects to this Request as harassing because it seeks information unrelated to the subject matter of this case. Plaintiff

further objects to this Request on the grounds that it seeks confidential, proprietary, and private personal and/or business information of Plaintiff and/or third parties to this litigation, which is not subject to discovery in this action. Plaintiff further objects to this Request on the grounds that it seeks documents protected by the attorney-client privilege, work-product doctrine, and/or any other applicable privilege, immunity, or protection. Plaintiff further objects to this request on the grounds that it seeks documents that belong to or are in possession of third parties, and/or are not within Plaintiff's possession, custody, or control. Plaintiff further objects to this Request on the grounds that it seeks documents that are irrelevant and appears calculated to harass.

Dated: November 29, 2021

Respectfully submitted,

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

CERTIFICATE OF SERVICE

I hereby certify that on this 29th day of November 2021, I caused copies of the foregoing to be served via email (per written agreement between the Parties) on the following:

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Andrew Crawford

Andrew C. Crawford (VSB #89093)

VIRGINIA:

IN THE CIRCUIT COURT OF FAIRFAX COUNTY, VIRGINIA

JOHN C. DEPP, II	:	
	:	
Plaintiff and Counterclaim Defendant,	:	
	:	
v.	:	
	:	
AMBER LAURA HEARD,	:	Civil Action No.: CL-2019-0002911
	:	
Defendant and Counterclaim Plaintiff.	:	
	:	

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

Pursuant to Rule 4:9 of the Rules of the Supreme Court of Virginia, Plaintiff and Counterclaim Defendant John C. Depp, II ("Plaintiff" and/or "Mr. Depp"), by and through his undersigned counsel, hereby responds and objects to Defendant and Counterclaim Plaintiff Amber Laura Heard's ("Defendant" and/or "Ms. Heard") Sixteenth Set of Requests for Production of Documents (each, a "Request" and collectively, the "Requests"), dated November 19, 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

discovery of admissible evidence, is likely to be stored. These identified devices include an iPhone, an iPad, a MacBook Pro, an iCloud account, the devices and data belonging to Stephen Deuters collected in May 2017 (iPad and iPhone), and the devices and data belonging to Nathan Holmes collected in March 2018 (iPhone). This definition further includes Mr. Depp's current devices and current cloud backups containing any data from the devices identified in response to Interrogatory No. 3 of Ms. Heard's 1st Set of Interrogatories.

RESPONSE: Plaintiff objects to this as overbroad, unduly burdensome and harassing, especially in light of the Court's November 8, 2021 Order, denying Defendant's Motion to Compel Plaintiff's devices. Plaintiff further objects to this on the grounds that it exceeds the obligations applicable to discovery responses under Virginia law including that it requests documents and information not in Plaintiff's actual possession, custody, or control and would require the generation of unnecessary documents, which are not legitimately at issue. Plaintiff further objects on grounds of privilege, privacy, and relevance.

u. ***Depp Abuse of Heard Dates.*** The phrase "Depp Abuse of Heard Dates" refers to the time periods contained in the Court's November 8, 2021 Order: December 15, 2012-January 15, 2013; March 6-April 5, 2013; June 1-June 30, 2013; May 22-June 7, 2014; August 15-August 31, 2014; December 15-December 31, 2014; January 23-February 8, 2015; March 1-April 6, 2015; August 1-August 31, 2015; November 24-December 10, 2015; December 13, 2015-January 12, 2016; April 19-May 5, 2016; May 19-June 4, 2016; and July 15-July 29, 2016.

RESPONSE: No objection to the dates. Objection to the use of the term "Depp Abuse of Heard Dates" on the grounds that it assumes facts that are disputed, and lacks foundation for the same.

v. ***Mr. Depp's Forensic Experts.*** The phrase "Mr. Depp's Forensic Experts" refers to Bryan Neumeister and/or Mr. Neumeister's colleague, Matt Erickson.

RESPONSE: No objection.

w. ***Depp Alleged Abuse by Heard Dates.*** The phrase "Depp Alleged Abuse by Heard Dates" refers to the following time periods reflected in Mr. Depp's Declaration submitted to

the Fairfax County Circuit Court in May 2019 and in Mr. Depp's Witness Statements submitted in the UK Litigation: November 21, 2014- March 11, 2015; March 1- April 6, 2015; October 12- November 1, 2015; December 5-26, 2015; April 11- May 6, 2016; and May 11- June 4, 2016.

> **RESPONSE:** Plaintiff objects to this as overbroad, unduly burdensome and harassing. Plaintiff further objects to this on the grounds that it exceeds the obligations applicable to discovery responses under Virginia law and would require the generation of unnecessary documents, which are not legitimately at issue. Plaintiff further objects on grounds of privilege and privacy. Plaintiff further objects on the grounds that this definition overlaps with some of the same time periods outlined in Defendant's definition of "Depp Abuse of Heard Dates."

REQUESTS

1. Please produce all documents and communications containing the word "monster" from January 1, 2012 to the present.

RESPONSE:

Plaintiff repeats and incorporates by this reference the General Objections and Objections to Definitions and Instruction above, as though set forth in full. 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 is overly broad and unduly burdensome taking into account the needs of the case, including because it seeks "all" documents and communications. Plaintiff further objects to this Request as harassing because it seeks information unrelated to the subject matter of this case. 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 seeks documents that are protected by the attorney-client privilege, work-product doctrine, or any other applicable privilege, immunity, or protection. Plaintiff further objects to this Request on the grounds that it seeks private or confidential documents. Plaintiff further objects to this Request on the grounds that it is duplicative of other discovery. Plaintiff further objects to this Request

on the grounds that it is patently overbroad, fails to reasonably particularize or specifically describe categories of documents related to this action, and appears calculated to harass.

2. Please produce all documents and communications supporting, refuting, or otherwise related to the following statement from Mr. Depp's 4th Defense to the Counterclaim: "The statements forming the basis of the counterclaim are not false and defamatory because they were truthful."

RESPONSE:

Plaintiff repeats and incorporates by this reference the General Objections and Objections to Definitions and Instruction above, as though set forth in full. 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 is overly broad and unduly burdensome taking into account the needs of the case, including because it seeks "all" documents and communications. Plaintiff further objects to this Request as harassing because it seeks information unrelated to the subject matter of this case. 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 seeks documents that are protected by the attorney-client privilege, work-product doctrine, or any other applicable privilege, immunity, or protection. Plaintiff further objects to this Request on the grounds that it seeks private or confidential documents. Plaintiff further objects to this Request on the grounds that it is duplicative of other discovery. Plaintiff further objects that the Request is unreasonably broad and vague and calls for a legal conclusion in that it seeks all documents "supporting, refuting, or otherwise related to" a statement. Plaintiff objects that Defendant has failed to describe reasonably identifiable categories of documents for production and instead has improperly attempted to shift the burden to Plaintiff to analyze what documents might be deemed to "support, refute, or otherwise relate" to a particular statement, which implicates the work

product of counsel. Plaintiff further objects to the Request as being unduly cumulative and harassing.

3. Please produce all documents and communications supporting, refuting, or otherwise related to the following statement from Mr. Depp's 5th Defense to the Counterclaim: whether or not there was authorization from Counterclaim Defendant to, or a conspiracy with, Mr. Waldman to make the statements forming the basis of the Counterclaim"." [sic]

RESPONSE:

Plaintiff repeats and incorporates by this reference the General Objections and Objections to Definitions and Instruction above, as though set forth in full. 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 is overly broad and unduly burdensome taking into account the needs of the case, including because it seeks "all" documents and communications. Plaintiff further objects to this Request as harassing because it seeks information unrelated to the subject matter of this case. 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 seeks documents that are protected by the attorney-client privilege, work-product doctrine, or any other applicable privilege, immunity, or protection. Plaintiff further objects to this Request on the grounds that it seeks private or confidential documents. Plaintiff further objects to this Request on the grounds that it is duplicative of other discovery. Plaintiff further objects to this Request to the extent it calls for a legal conclusion. Plaintiff further objects that the Request is unreasonably broad and vague and calls for a legal conclusion in that it seeks all documents "supporting, refuting, or otherwise related to" a statement. Plaintiff objects that Defendant has failed to describe reasonably identifiable categories of documents for production and instead has improperly attempted to shift the burden to Plaintiff to analyze what documents might be deemed

to "support, refute, or otherwise relate" to a particular statement, which implicates the work product of counsel. Plaintiff further objects to the Request as being unduly cumulative and harassing. Plaintiff further objects to this Request on the grounds that it openly seeks documents related to Mr. Waldman that are protected by the attorney-client privilege and work-product doctrine, and are not subject to discovery in this action. Defendant has articulated no valid basis to seek privileged materials.

4. Please produce all documents and communications supporting, refuting, or otherwise related to the following statement from Mr. Depp's 5th Defense to the Counterclaim: "Counterclaim Defendant's lack of direction as to the subject statements."

RESPONSE:

Plaintiff repeats and incorporates by this reference the General Objections and Objections to Definitions and Instruction above, as though set forth in full. 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 is overly broad and unduly burdensome taking into account the needs of the case, including because it seeks "all" documents and communications. Plaintiff further objects to this Request as harassing because it seeks information unrelated to the subject matter of this case. 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 seeks documents that are protected by the attorney-client privilege, work-product doctrine, or any other applicable privilege, immunity, or protection. Plaintiff further objects to this Request on the grounds that it seeks private or confidential documents. Plaintiff further objects to this Request on the grounds that it is duplicative of other discovery. Plaintiff further objects that the Request is unreasonably broad and vague and calls for a legal conclusion in that it seeks all documents "supporting, refuting, or otherwise related to" a statement. Plaintiff objects that Defendant has

failed to describe reasonably identifiable categories of documents for production and instead has improperly attempted to shift the burden to Plaintiff to analyze what documents might be deemed to "support, refute, or otherwise relate" to a particular statement, which implicates the work product of counsel. Plaintiff further objects to the Request as being unduly cumulative and harassing. Plaintiff further objects to this Request on the grounds that it openly seeks documents related to Mr. Waldman that are protected by the attorney-client privilege and work-product doctrine, and are not subject to discovery in this action. Defendant has articulated no valid basis to seek privileged materials.

5. Please produce all documents and communications supporting, refuting, or otherwise related to the following statement from Mr. Depp's 5th Defense to the Counterclaim: "Counterclaim Defendant's lack of direction or control of a third party as to the subject statements."

RESPONSE:

Plaintiff repeats and incorporates by this reference the General Objections and Objections to Definitions and Instruction above, as though set forth in full. 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 is overly broad and unduly burdensome taking into account the needs of the case, including because it seeks "all" documents and communications. Plaintiff further objects to this Request as harassing because it seeks information unrelated to the subject matter of this case. 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 seeks documents that are protected by the attorney-client privilege, work-product doctrine, or any other applicable privilege, immunity, or protection. Plaintiff further objects to this Request on the grounds that it seeks private or confidential documents. Plaintiff further objects to this Request

on the grounds that it is duplicative of other discovery. Plaintiff further objects that the Request is unreasonably broad and vague and calls for a legal conclusion in that it seeks all documents "supporting, refuting, or otherwise related to" a statement. Plaintiff objects that Defendant has failed to describe reasonably identifiable categories of documents for production and instead has improperly attempted to shift the burden to Plaintiff to analyze what documents might be deemed to "support, refute, or otherwise relate" to a particular statement, which implicates the work product of counsel. Plaintiff further objects to the Request as being unduly cumulative and harassing. Plaintiff further objects to this Request on the grounds that it openly seeks documents related to Mr. Waldman that are protected by the attorney-client privilege and work-product doctrine and are not subject to discovery in this action. Defendant has articulated no valid basis to seek privileged materials.

6. Please produce all documents and communications supporting, refuting, or otherwise related to the following statement from Mr. Depp's 5th Defense to the Counterclaim: "a third party's exceeding of the scope of employment or agency relationship as to the subject statements."

RESPONSE:

Plaintiff repeats and incorporates by this reference the General Objections and Objections to Definitions and Instruction above, as though set forth in full. 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 is overly broad and unduly burdensome taking into account the needs of the case, including because it seeks "all" documents and communications. Plaintiff further objects to this Request as harassing because it seeks information unrelated to the subject matter of this case. 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 seeks

documents that are protected by the attorney-client privilege, work-product doctrine, or any other applicable privilege, immunity, or protection. Plaintiff further objects to this Request on the grounds that it seeks private or confidential documents. Plaintiff further objects to this Request on the grounds that it is duplicative of other discovery. Plaintiff further objects to this Request to the extent it calls for a legal conclusion. Plaintiff further objects that the Request is unreasonably broad and vague in that it seeks all documents "supporting, refuting, or otherwise related to" a statement. Plaintiff objects that Defendant has failed to describe reasonably identifiable categories of documents for production and instead has improperly attempted to shift the burden to Plaintiff to analyze what documents might be deemed to "support, refute, or otherwise relate" to a particular statement, which implicates the work product of counsel. Plaintiff further objects to the Request as being unduly cumulative and harassing. Plaintiff further objects to this Request on the grounds that it openly seeks documents related to Mr. Waldman that are protected by the attorney-client privilege and work-product doctrine, and are not subject to discovery in this action. Defendant has articulated no valid basis to seek privileged materials.

7. Please produce all documents and communications supporting, refuting, or otherwise related to the following statement from Mr. Depp's 5th Defense to the Counterclaim: "statements made by an independent contractor."

RESPONSE:

Plaintiff repeats and incorporates by this reference the General Objections and Objections to Definitions and Instruction above, as though set forth in full. 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 is overly broad and unduly burdensome taking into account the needs of the case, including because it seeks "all" documents and communications. Plaintiff further objects to this Request as harassing because it seeks information unrelated to the subject

matter of this case. 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 seeks documents that are protected by the attorney-client privilege, work-product doctrine, or any other applicable privilege, immunity, or protection. Plaintiff further objects to this Request on the grounds that it seeks private or confidential documents. Plaintiff further objects to this Request on the grounds that it is duplicative of other discovery. Plaintiff further objects that the Request is unreasonably broad and vague in that it seeks all documents "supporting, refuting, or otherwise related to" a statement. Plaintiff objects that Defendant has failed to describe reasonably identifiable categories of documents for production and instead has improperly attempted to shift the burden to Plaintiff to analyze what documents might be deemed to "support, refute, or otherwise relate" to a particular statement, which implicates the work product of counsel. Plaintiff further objects to the Request as being unduly cumulative and harassing. Plaintiff further objects to this Request on the grounds that it openly seeks documents related to Mr. Waldman that are protected by the attorney-client privilege and work-product doctrine, and are not subject to discovery in this action. Defendant has articulated no valid basis to seek privileged materials.

8. Please produce all documents and communications supporting, refuting, or otherwise related to the following statement in ¶ 41 of your Answer to the Counterclaim- whether "that particular conduct by Mr. Waldman was authorized by Counterclaim Defendant or done at his direction."

RESPONSE:

Plaintiff repeats and incorporates by this reference the General Objections and Objections to Definitions and Instruction above, as though set forth in full. 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 is overly broad and unduly burdensome taking into account the needs of the case, including because it seeks "all" documents and communications. Plaintiff further objects to this Request as harassing because it seeks information unrelated to the subject matter of this case. 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 seeks documents that are protected by the attorney-client privilege, work-product doctrine, or any other applicable privilege, immunity, or protection. Plaintiff further objects to this Request on the grounds that it seeks private or confidential documents. Plaintiff further objects to this Request on the grounds that it is duplicative of other discovery. Plaintiff further objects that the Request is unreasonably broad and vague in that it seeks all documents "supporting, refuting, or otherwise related to" a statement. Plaintiff objects that Defendant has failed to describe reasonably identifiable categories of documents for production and instead has improperly attempted to shift the burden to Plaintiff to analyze what documents might be deemed to "support, refute, or otherwise relate" to a particular statement, which implicates the work product of counsel. Plaintiff further objects to the Request as being unduly cumulative and harassing. Plaintiff further objects to this Request on the grounds that it openly seeks documents related to Mr. Waldman that are protected by the attorney-client privilege and work-product doctrine, and are not subject to discovery in this action. Defendant has articulated no valid basis to seek privileged materials. Plaintiff further objects that the Request is vague, ambiguous, and unintelligible.

9. Please produce all documents and communications supporting, refuting, or otherwise related to the following statement in ¶ 42 of your Answer to the Counterclaim- whether "that particular conduct by Mr. Waldman was authorized by Counterclaim Defendant or done at his direction."

RESPONSE:

Plaintiff repeats and incorporates by this reference the General Objections and Objections to Definitions and Instruction above, as though set forth in full. 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 is overly broad and unduly burdensome taking into account the needs of the case, including because it seeks "all" documents and communications. Plaintiff further objects to this Request as harassing because it seeks information unrelated to the subject matter of this case. 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 seeks documents that are protected by the attorney-client privilege, work-product doctrine, or any other applicable privilege, immunity, or protection. Plaintiff further objects to this Request on the grounds that it seeks private or confidential documents. Plaintiff further objects to this Request on the grounds that it is duplicative of other discovery. Plaintiff further objects that the Request is unreasonably broad and vague in that it seeks all documents "supporting, refuting, or otherwise related to" a statement. Plaintiff objects that Defendant has failed to describe reasonably identifiable categories of documents for production and instead has improperly attempted to shift the burden to Plaintiff to analyze what documents might be deemed to "support, refute, or otherwise relate" to a particular statement, which implicates the work product of counsel. Plaintiff further objects to the Request as being unduly cumulative and harassing. Plaintiff further objects to this Request on the grounds that it openly seeks documents related to Mr. Waldman that are protected by the attorney-client privilege and work-product doctrine, and are not subject to discovery in this action. Defendant has articulated no valid basis to seek

privileged materials. Plaintiff further objects that the Request is vague, ambiguous, and unintelligible.

10. Please produce all documents and communications supporting, refuting, or otherwise related to the following statement in ¶ 44 of your Answer to the Counterclaim- whether "that particular conduct by Mr. Waldman was authorized by Counterclaim Defendant or done at his direction."

RESPONSE:

Plaintiff repeats and incorporates by this reference the General Objections and Objections to Definitions and Instruction above, as though set forth in full. 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 is overly broad and unduly burdensome taking into account the needs of the case, including because it seeks "all" documents and communications. Plaintiff further objects to this Request as harassing because it seeks information unrelated to the subject matter of this case. 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 seeks documents that are protected by the attorney-client privilege, work-product doctrine, or any other applicable privilege, immunity, or protection. Plaintiff further objects to this Request on the grounds that it seeks private or confidential documents. Plaintiff further objects to this Request on the grounds that it is duplicative of other discovery. Plaintiff further objects that the Request is unreasonably broad and vague in that it seeks all documents "supporting, refuting, or otherwise related to" a statement. Plaintiff objects that Defendant has failed to describe reasonably identifiable categories of documents for production and instead has improperly attempted to shift the burden to Plaintiff to analyze what documents might be deemed to "support, refute, or otherwise relate" to a particular statement, which implicates the work product

of counsel. Plaintiff further objects to the Request as being unduly cumulative and harassing. Plaintiff further objects to this Request on the grounds that it openly seeks documents related to Mr. Waldman that are protected by the attorney-client privilege and work-product doctrine, and are not subject to discovery in this action. Defendant has articulated no valid basis to seek privileged materials. Plaintiff further objects that the Request is vague, ambiguous, and unintelligible.

11. Please produce all documents and communications supporting, refuting, or otherwise related to the following statement in ¶ 45 of your Answer to the Counterclaim- whether "that particular conduct by Mr. Waldman was authorized by Counterclaim Defendant or done at his direction."

RESPONSE:

Plaintiff repeats and incorporates by this reference the General Objections and Objections to Definitions and Instruction above, as though set forth in full. 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 is overly broad and unduly burdensome taking into account the needs of the case, including because it seeks "all" documents and communications. Plaintiff further objects to this Request as harassing because it seeks information unrelated to the subject matter of this case. 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 seeks documents that are protected by the attorney-client privilege, work-product doctrine, or any other applicable privilege, immunity, or protection. Plaintiff further objects to this Request on the grounds that it seeks private or confidential documents. Plaintiff further objects to this Request on the grounds that it is duplicative of other discovery. Plaintiff further objects that the Request is unreasonably broad and vague in that it seeks all documents "supporting, refuting, or

otherwise related to" a statement. Plaintiff objects that Defendant has failed to describe reasonably identifiable categories of documents for production and instead has improperly attempted to shift the burden to Plaintiff to analyze what documents might be deemed to "support, refute, or otherwise relate" to a particular statement, which implicates the work product of counsel. Plaintiff further objects to the Request as being unduly cumulative and harassing. Plaintiff further objects to this Request on the grounds that it openly seeks documents related to Mr. Waldman that are protected by the attorney-client privilege and work-product doctrine, and are not subject to discovery in this action. Defendant has articulated no valid basis to seek privileged materials. Plaintiff further objects that the Request is vague, ambiguous, and unintelligible.

12. Please produce all documents and communications supporting, refuting, or otherwise related to the following statement in ¶ 46 of your Answer to the Counterclaim- whether "that particular conduct by Mr. Waldman was authorized by Counterclaim Defendant or done at his direction."

RESPONSE:

Plaintiff repeats and incorporates by this reference the General Objections and Objections to Definitions and Instruction above, as though set forth in full. 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 is overly broad and unduly burdensome taking into account the needs of the case, including because it seeks "all" documents and communications. Plaintiff further objects to this Request as harassing because it seeks information unrelated to the subject matter of this case. 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 seeks documents that are protected by the attorney-client privilege, work-product doctrine, or any other

applicable privilege, immunity, or protection. Plaintiff further objects to this Request on the grounds that it seeks private or confidential documents. Plaintiff further objects to this Request on the grounds that it is duplicative of other discovery. Plaintiff further objects that the Request is unreasonably broad and vague in that it seeks all documents "supporting, refuting, or otherwise related to" a statement. Plaintiff objects that Defendant has failed to describe reasonably identifiable categories of documents for production and instead has improperly attempted to shift the burden to Plaintiff to analyze what documents might be deemed to "support, refute, or otherwise relate" to a particular statement, which implicates the work product of counsel. Plaintiff further objects to the Request as being unduly cumulative and harassing. Plaintiff further objects to this Request on the grounds that it openly seeks documents related to Mr. Waldman that are protected by the attorney-client privilege and work-product doctrine, and are not subject to discovery in this action. Defendant has articulated no valid basis to seek privileged materials. Plaintiff further objects that the Request is vague, ambiguous, and unintelligible.

13. Please produce all documents and communications supporting, refuting, or otherwise related to the following statement in ¶ 47 of your Answer to the Counterclaim- whether "that particular conduct by Mr. Waldman was authorized by Counterclaim Defendant or done at his direction."

RESPONSE:

Plaintiff repeats and incorporates by this reference the General Objections and Objections to Definitions and Instruction above, as though set forth in full. 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 is overly broad and unduly burdensome taking into account the needs of the case, including because it seeks "all" documents and communications. Plaintiff

further objects to this Request as harassing because it seeks information unrelated to the subject matter of this case. 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 seeks documents that are protected by the attorney-client privilege, work-product doctrine, or any other applicable privilege, immunity, or protection. Plaintiff further objects to this Request on the grounds that it seeks private or confidential documents. Plaintiff further objects to this Request on the grounds that it is duplicative of other discovery. Plaintiff further objects that the Request is unreasonably broad and vague in that it seeks all documents "supporting, refuting, or otherwise related to" a statement. Plaintiff objects that Defendant has failed to describe reasonably identifiable categories of documents for production and instead has improperly attempted to shift the burden to Plaintiff to analyze what documents might be deemed to "support, refute, or otherwise relate" to a particular statement, which implicates the work product of counsel. Plaintiff further objects to the Request as being unduly cumulative and harassing. Plaintiff further objects to this Request on the grounds that it openly seeks documents related to Mr. Waldman that are protected by the attorney-client privilege and work-product doctrine, and are not subject to discovery in this action. Defendant has articulated no valid basis to seek privileged materials. Plaintiff further objects that the Request is vague, ambiguous, and unintelligible.

14. Please produce all documents and communications supporting, refuting, or otherwise related to the following statement in ¶ 48 of your Answer to the Counterclaim- whether "that particular conduct by Mr. Waldman was authorized by Counterclaim Defendant or done at his direction."

RESPONSE:

Plaintiff repeats and incorporates by this reference the General Objections and Objections to Definitions and Instruction above, as though set forth in full. 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 is overly broad and unduly burdensome taking into account the needs of the case, including because it seeks "all" documents and communications. Plaintiff further objects to this Request as harassing because it seeks information unrelated to the subject matter of this case. 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 seeks documents that are protected by the attorney-client privilege, work-product doctrine, or any other applicable privilege, immunity, or protection. Plaintiff further objects to this Request on the grounds that it seeks private or confidential documents. Plaintiff further objects to this Request on the grounds that it is duplicative of other discovery. Plaintiff further objects that the Request is unreasonably broad and vague in that it seeks all documents "supporting, refuting, or otherwise related to" a statement. Plaintiff objects that Defendant has failed to describe reasonably identifiable categories of documents for production and instead has improperly attempted to shift the burden to Plaintiff to analyze what documents might be deemed to "support, refute, or otherwise relate" to a particular statement, which implicates the work product of counsel. Plaintiff further objects to the Request as being unduly cumulative and harassing. Plaintiff further objects to this Request on the grounds that it openly seeks documents related to Mr. Waldman that are protected by the attorney-client privilege and work-product doctrine, and are not subject to discovery in this action. Defendant has articulated no valid basis to seek privileged materials. Plaintiff further objects that the Request is vague, ambiguous, and unintelligible.

15. Please produce all documents and communications supporting, refuting, or otherwise related to the following statement in ¶ 49 of your Answer to the Counterclaim- whether "that particular conduct by Mr. Waldman was authorized by Counterclaim Defendant or done at his direction."

RESPONSE:

Plaintiff repeats and incorporates by this reference the General Objections and Objections to Definitions and Instruction above, as though set forth in full. 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 is overly broad and unduly burdensome taking into account the needs of the case, including because it seeks "all" documents and communications. Plaintiff further objects to this Request as harassing because it seeks information unrelated to the subject matter of this case. 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 seeks documents that are protected by the attorney-client privilege, work-product doctrine, or any other applicable privilege, immunity, or protection. Plaintiff further objects to this Request on the grounds that it seeks private or confidential documents. Plaintiff further objects to this Request on the grounds that it is duplicative of other discovery. Plaintiff further objects that the Request is unreasonably broad and vague in that it seeks all documents "supporting, refuting, or otherwise related to" a statement. Plaintiff objects that Defendant has failed to describe reasonably identifiable categories of documents for production and instead has improperly attempted to shift the burden to Plaintiff to analyze what documents might be deemed to "support, refute, or otherwise relate" to a particular statement, which implicates the work product of counsel. Plaintiff further objects to the Request as being unduly cumulative and harassing. Plaintiff further objects to this Request on the grounds that it openly seeks documents related to

Mr. Waldman that are protected by the attorney-client privilege and work-product doctrine, and are not subject to discovery in this action. Defendant has articulated no valid basis to seek privileged materials. Plaintiff further objects that the Request is vague, ambiguous, and unintelligible.

16. Please produce all documents and communications supporting, refuting, or otherwise related to the following statement in ¶ 52 of your Answer to the Counterclaim- whether "that particular conduct by Mr. Waldman was authorized by Counterclaim Defendant or done at his direction."

RESPONSE:

Plaintiff repeats and incorporates by this reference the General Objections and Objections to Definitions and Instruction above, as though set forth in full. 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 is overly broad and unduly burdensome taking into account the needs of the case, including because it seeks "all" documents and communications. Plaintiff further objects to this Request as harassing because it seeks information unrelated to the subject matter of this case. 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 seeks documents that are protected by the attorney-client privilege, work-product doctrine, or any other applicable privilege, immunity, or protection. Plaintiff further objects to this Request on the grounds that it seeks private or confidential documents. Plaintiff further objects to this Request on the grounds that it is duplicative of other discovery. Plaintiff further objects that the Request is unreasonably broad and vague in that it seeks all documents "supporting, refuting, or otherwise related to" a statement. Plaintiff objects that Defendant has failed to describe reasonably identifiable categories of documents for production and instead has improperly

attempted to shift the burden to Plaintiff to analyze what documents might be deemed to "support, refute, or otherwise relate" to a particular statement, which implicates the work product of counsel. Plaintiff further objects to the Request as being unduly cumulative and harassing. Plaintiff further objects to this Request on the grounds that it openly seeks documents related to Mr. Waldman that are protected by the attorney-client privilege and work-product doctrine, and are not subject to discovery in this action. Defendant has articulated no valid basis to seek privileged materials. Plaintiff further objects that the Request is vague, ambiguous, and unintelligible.

17. Please produce all documents and communications supporting, refuting, or otherwise related to the following statement in ¶ 66 of your Answer to the Counterclaim- whether "that particular conduct by Mr. Waldman was performed as an agent or was authorized by Counterclaim Defendant or done at his direction."

RESPONSE:

Plaintiff repeats and incorporates by this reference the General Objections and Objections to Definitions and Instruction above, as though set forth in full. 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 is overly broad and unduly burdensome taking into account the needs of the case, including because it seeks "all" documents and communications. Plaintiff further objects to this Request as harassing because it seeks information unrelated to the subject matter of this case. 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 seeks documents that are protected by the attorney-client privilege, work-product doctrine, or any other applicable privilege, immunity, or protection. Plaintiff further objects to this Request on the grounds that it seeks private or confidential documents. Plaintiff further objects to this Request

on the grounds that it is duplicative of other discovery. Plaintiff further objects to this Request to the extent it calls for a legal conclusion. Plaintiff further objects that the Request is unreasonably broad and vague in that it seeks all documents "supporting, refuting, or otherwise related to" a statement. Plaintiff objects that Defendant has failed to describe reasonably identifiable categories of documents for production and instead has improperly attempted to shift the burden to Plaintiff to analyze what documents might be deemed to "support, refute, or otherwise relate" to a particular statement, which implicates the work product of counsel. Plaintiff further objects to the Request as being unduly cumulative and harassing. Plaintiff further objects to this Request on the grounds that it openly seeks documents related to Mr. Waldman that are protected by the attorney-client privilege and work-product doctrine, and are not subject to discovery in this action. Defendant has articulated no valid basis to seek privileged materials. Plaintiff further objects that the Request is vague, ambiguous, and unintelligible.

18. Please produce all documents and communications supporting, refuting, or otherwise related to the following statement in ¶ 66(a) of your Answer to the Counterclaim-whether "that particular conduct by Mr. Waldman was performed as an agent or was authorized by Counterclaim Defendant or done at his direction."

RESPONSE:

Plaintiff repeats and incorporates by this reference the General Objections and Objections to Definitions and Instruction above, as though set forth in full. 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 is overly broad and unduly burdensome taking into account the needs of the case, including because it seeks "all" documents and communications. Plaintiff further objects to this Request as harassing because it seeks information unrelated to the subject matter of this case. 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 seeks documents that are protected by the attorney-client privilege, work-product doctrine, or any other applicable privilege, immunity, or protection. Plaintiff further objects to this Request on the grounds that it seeks private or confidential documents. Plaintiff further objects to this Request on the grounds that it is duplicative of other discovery. Plaintiff further objects to this Request to the extent it calls for a legal conclusion. Plaintiff further objects that the Request is unreasonably broad and vague in that it seeks all documents "supporting, refuting, or otherwise related to" a statement. Plaintiff objects that Defendant has failed to describe reasonably identifiable categories of documents for production and instead has improperly attempted to shift the burden to Plaintiff to analyze what documents might be deemed to "support, refute, or otherwise relate" to a particular statement, which implicates the work product of counsel. Plaintiff further objects to the Request as being unduly cumulative and harassing. Plaintiff further objects to this Request on the grounds that it openly seeks documents related to Mr. Waldman that are protected by the attorney-client privilege and work-product doctrine, and are not subject to discovery in this action. Defendant has articulated no valid basis to seek privileged materials. Plaintiff further objects that the Request is vague, ambiguous, and unintelligible.

19. Please produce all documents and communications supporting, refuting, or otherwise related to the following statement in ¶ 66(b) of your Answer to the Counterclaim-whether "that particular conduct by Mr. Waldman was performed as an agent or was authorized by Counterclaim Defendant or done at his direction."

RESPONSE:

Plaintiff repeats and incorporates by this reference the General Objections and Objections to Definitions and Instruction above, as though set forth in full. 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 is overly broad and unduly burdensome taking into account the needs of the case, including because it seeks "all" documents and communications. Plaintiff further objects to this Request as harassing because it seeks information unrelated to the subject matter of this case. 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 seeks documents that are protected by the attorney-client privilege, work-product doctrine, or any other applicable privilege, immunity, or protection. Plaintiff further objects to this Request on the grounds that it seeks private or confidential documents. Plaintiff further objects to this Request on the grounds that it is duplicative of other discovery. Plaintiff further objects to this Request to the extent it calls for a legal conclusion. Plaintiff further objects that the Request is unreasonably broad and vague in that it seeks all documents "supporting, refuting, or otherwise related to" a statement. Plaintiff objects that Defendant has failed to describe reasonably identifiable categories of documents for production and instead has improperly attempted to shift the burden to Plaintiff to analyze what documents might be deemed to "support, refute, or otherwise relate" to a particular statement, which implicates the work product of counsel. Plaintiff further objects to the Request as being unduly cumulative and harassing. Plaintiff further objects to this Request on the grounds that it openly seeks documents related to Mr. Waldman that are protected by the attorney-client privilege and work-product doctrine, and are not subject to discovery in this action. Defendant has articulated no valid basis to seek privileged materials. Plaintiff further objects that the Request is vague, ambiguous, and unintelligible.

20. Please produce all documents and communications supporting, refuting, or otherwise related to the following statement in ¶ 66(c) of your Answer to the Counterclaim-whether "that particular conduct by Mr. Waldman was performed as an agent or was authorized by Counterclaim Defendant or done at his direction."

RESPONSE:

Plaintiff repeats and incorporates by this reference the General Objections and Objections to Definitions and Instruction above, as though set forth in full. 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 is overly broad and unduly burdensome taking into account the needs of the case, including because it seeks "all" documents and communications. Plaintiff further objects to this Request as harassing because it seeks information unrelated to the subject matter of this case. 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 seeks documents that are protected by the attorney-client privilege, work-product doctrine, or any other applicable privilege, immunity, or protection. Plaintiff further objects to this Request on the grounds that it seeks private or confidential documents. Plaintiff further objects to this Request on the grounds that it is duplicative of other discovery. Plaintiff further objects to this Request to the extent it calls for a legal conclusion. Plaintiff further objects that the Request is unreasonably broad and vague in that it seeks all documents "supporting, refuting, or otherwise related to" a statement. Plaintiff objects that Defendant has failed to describe reasonably identifiable categories of documents for production and instead has improperly attempted to shift the burden to Plaintiff to analyze what documents might be deemed to "support, refute, or otherwise relate" to a particular statement, which implicates the work product of counsel. Plaintiff further objects to the Request as being unduly cumulative and harassing. Plaintiff further objects to this Request on the grounds that it openly seeks documents related to Mr. Waldman that are protected by the attorney-client privilege and work-product doctrine, and are not subject to discovery in this

action. Defendant has articulated no valid basis to seek privileged materials. Plaintiff further objects that the Request is vague, ambiguous, and unintelligible.

21. Please produce all documents and communications supporting, refuting, or otherwise related to the following statement in ¶ 66(d) of your Answer to the Counterclaim-whether "that particular conduct by Mr. Waldman was performed as an agent or was authorized by Counterclaim Defendant or done at his direction."

RESPONSE:

Plaintiff repeats and incorporates by this reference the General Objections and Objections to Definitions and Instruction above, as though set forth in full. 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 is overly broad and unduly burdensome taking into account the needs of the case, including because it seeks "all" documents and communications. Plaintiff further objects to this Request as harassing because it seeks information unrelated to the subject matter of this case. 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 seeks documents that are protected by the attorney-client privilege, work-product doctrine, or any other applicable privilege, immunity, or protection. Plaintiff further objects to this Request on the grounds that it seeks private or confidential documents. Plaintiff further objects to this Request on the grounds that it is duplicative of other discovery. Plaintiff further objects to this Request to the extent it calls for a legal conclusion. Plaintiff further objects that the Request is unreasonably broad and vague in that it seeks all documents "supporting, refuting, or otherwise related to" a statement. Plaintiff objects that Defendant has failed to describe reasonably identifiable categories of documents for production and instead has improperly attempted to shift the burden to Plaintiff to analyze what documents might be deemed to "support, refute, or otherwise relate"

to a particular statement, which implicates the work product of counsel. Plaintiff further objects to the Request as being unduly cumulative and harassing. Plaintiff further objects to this Request on the grounds that it openly seeks documents related to Mr. Waldman that are protected by the attorney-client privilege and work-product doctrine, and are not subject to discovery in this action. Defendant has articulated no valid basis to seek privileged materials. Plaintiff further objects that the Request is vague, ambiguous, and unintelligible.

22. Please produce all documents and communications supporting, refuting, or otherwise related to the following statement in ¶ 66(e) of your Answer to the Counterclaim-whether "that particular conduct by Mr. Waldman was performed as an agent or was authorized by Counterclaim Defendant or done at his direction."

RESPONSE:

Plaintiff repeats and incorporates by this reference the General Objections and Objections to Definitions and Instruction above, as though set forth in full. 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 is overly broad and unduly burdensome taking into account the needs of the case, including because it seeks "all" documents and communications. Plaintiff further objects to this Request as harassing because it seeks information unrelated to the subject matter of this case. 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 seeks documents that are protected by the attorney-client privilege, work-product doctrine, or any other applicable privilege, immunity, or protection. Plaintiff further objects to this Request on the grounds that it seeks private or confidential documents. Plaintiff further objects to this Request on the grounds that it is duplicative of other discovery. Plaintiff further objects to this Request to the extent it calls for a legal conclusion. Plaintiff further objects that the Request is unreasonably

broad and vague in that it seeks all documents "supporting, refuting, or otherwise related to" a statement. Plaintiff objects that Defendant has failed to describe reasonably identifiable categories of documents for production and instead has improperly attempted to shift the burden to Plaintiff to analyze what documents might be deemed to "support, refute, or otherwise relate" to a particular statement, which implicates the work product of counsel. Plaintiff further objects to the Request as being unduly cumulative and harassing. Plaintiff further objects to this Request on the grounds that it openly seeks documents related to Mr. Waldman that are protected by the attorney-client privilege and work-product doctrine, and are not subject to discovery in this action. Defendant has articulated no valid basis to seek privileged materials. Plaintiff further objects that the Request is vague, ambiguous, and unintelligible.

23. Please produce all documents and communications supporting, refuting, or otherwise related to the following statement in ¶ 66(f) of your Answer to the Counterclaim- whether "that particular conduct by Mr. Waldman was performed as an agent or was authorized by Counterclaim Defendant or done at his direction."

RESPONSE:

Plaintiff repeats and incorporates by this reference the General Objections and Objections to Definitions and Instruction above, as though set forth in full. 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 is overly broad and unduly burdensome taking into account the needs of the case, including because it seeks "all" documents and communications. Plaintiff further objects to this Request as harassing because it seeks information unrelated to the subject matter of this case. 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 seeks documents that are protected by the attorney-client privilege, work-product doctrine, or any other

applicable privilege, immunity, or protection. Plaintiff further objects to this Request on the grounds that it seeks private or confidential documents. Plaintiff further objects to this Request on the grounds that it is duplicative of other discovery. Plaintiff further objects to this Request to the extent it calls for a legal conclusion. Plaintiff further objects that the Request is unreasonably broad and vague in that it seeks all documents "supporting, refuting, or otherwise related to" a statement. Plaintiff objects that Defendant has failed to describe reasonably identifiable categories of documents for production and instead has improperly attempted to shift the burden to Plaintiff to analyze what documents might be deemed to "support, refute, or otherwise relate" to a particular statement, which implicates the work product of counsel. Plaintiff further objects to the Request as being unduly cumulative and harassing. Plaintiff further objects to this Request on the grounds that it openly seeks documents related to Mr. Waldman that are protected by the attorney-client privilege and work-product doctrine, and are not subject to discovery in this action. Defendant has articulated no valid basis to seek privileged materials. Plaintiff further objects that the Request is vague, ambiguous, and unintelligible.

24. Please produce all documents and communications supporting, refuting, or otherwise related to the following statement in ¶ 67 of your Answer to the Counterclaim- whether "that particular conduct by Mr. Waldman was performed as an agent or was authorized by Counterclaim Defendant or done at his direction."

RESPONSE:

Plaintiff repeats and incorporates by this reference the General Objections and Objections to Definitions and Instruction above, as though set forth in full. 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 is overly broad and unduly burdensome taking into account the needs of the case, including because it seeks "all" documents and communications. Plaintiff

further objects to this Request as harassing because it seeks information unrelated to the subject matter of this case. 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 seeks documents that are protected by the attorney-client privilege, work-product doctrine, or any other applicable privilege, immunity, or protection. Plaintiff further objects to this Request on the grounds that it seeks private or confidential documents. Plaintiff further objects to this Request on the grounds that it is duplicative of other discovery. Plaintiff further objects to this Request to the extent it calls for a legal conclusion. Plaintiff further objects that the Request is unreasonably broad and vague in that it seeks all documents "supporting, refuting, or otherwise related to" a statement. Plaintiff objects that Defendant has failed to describe reasonably identifiable categories of documents for production and instead has improperly attempted to shift the burden to Plaintiff to analyze what documents might be deemed to "support, refute, or otherwise related to" a particular statement, which implicates the work product of counsel. Plaintiff further objects to the Request as being unduly cumulative and harassing. Plaintiff further objects to this Request on the grounds that it openly seeks documents related to Mr. Waldman that are protected by the attorney-client privilege and work-product doctrine, and are not subject to discovery in this action. Defendant has articulated no valid basis to seek privileged materials. Plaintiff further objects that the Request is vague, ambiguous, and unintelligible.

25. Please produce all documents and communications supporting, refuting, or otherwise related to the following statement in ¶ 68 of your Answer to the Counterclaim- whether "that particular conduct by Mr. Waldman was performed as an agent or was authorized by Counterclaim Defendant or done at his direction."

RESPONSE:

Plaintiff repeats and incorporates by this reference the General Objections and Objections to Definitions and Instruction above, as though set forth in full. 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 is overly broad and unduly burdensome taking into account the needs of the case, including because it seeks "all" documents and communications. Plaintiff further objects to this Request as harassing because it seeks information unrelated to the subject matter of this case. 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 seeks documents that are protected by the attorney-client privilege, work-product doctrine, or any other applicable privilege, immunity, or protection. Plaintiff further objects to this Request on the grounds that it seeks private or confidential documents. Plaintiff further objects to this Request on the grounds that it is duplicative of other discovery. Plaintiff further objects to this Request to the extent it calls for a legal conclusion. Plaintiff further objects that the Request is unreasonably broad and vague in that it seeks all documents "supporting, refuting, or otherwise related to" a statement. Plaintiff objects that Defendant has failed to describe reasonably identifiable categories of documents for production and instead has improperly attempted to shift the burden to Plaintiff to analyze what documents might be deemed to "support, refute, or otherwise relate" a particular statement, which implicates the work product of counsel. Plaintiff further objects to the Request as being unduly cumulative and harassing. Plaintiff further objects to this Request on the grounds that it openly seeks documents related to Mr. Waldman that are protected by the attorney-client privilege and work-product doctrine, and are not subject to discovery in this action. Defendant has articulated no valid basis to seek privileged materials. Plaintiff further objects that the Request is vague, ambiguous, and unintelligible.

26. Please produce all documents and communications supporting, refuting, or otherwise related to the following statement in ¶ 69 of your Answer to the Counterclaim- whether "that particular conduct by Mr. Waldman was performed as an agent or was authorized by Counterclaim Defendant or done at his direction."

RESPONSE:

Plaintiff repeats and incorporates by this reference the General Objections and Objections to Definitions and Instruction above, as though set forth in full. 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 is overly broad and unduly burdensome taking into account the needs of the case, including because it seeks "all" documents and communications. Plaintiff further objects to this Request as harassing because it seeks information unrelated to the subject matter of this case. 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 seeks documents that are protected by the attorney-client privilege, work-product doctrine, or any other applicable privilege, immunity, or protection. Plaintiff further objects to this Request on the grounds that it seeks private or confidential documents. Plaintiff further objects to this Request on the grounds that it is duplicative of other discovery. Plaintiff further objects to this Request to the extent it calls for a legal conclusion. Plaintiff further objects that the Request is unreasonably broad and vague in that it seeks all documents "supporting, refuting, or otherwise related to" a statement. Plaintiff objects that Defendant has failed to describe reasonably identifiable categories of documents for production and instead has improperly attempted to shift the burden to Plaintiff to analyze what documents might be deemed to "support, refute, or otherwise relate" to a particular statement, which implicates the work product of counsel. Plaintiff further objects to the Request as being unduly cumulative and harassing. Plaintiff further objects to this Request

on the grounds that it openly seeks documents related to Mr. Waldman that are protected by the attorney-client privilege and work-product doctrine, and are not subject to discovery in this action. Defendant has articulated no valid basis to seek privileged materials. Plaintiff further objects that the Request is vague, ambiguous, and unintelligible.

27. Please produce all documents and communications supporting, refuting, or otherwise related to the following statement in ¶ 70 of your Answer to the Counterclaim- whether "that particular conduct by Mr. Waldman was performed as an agent or was authorized by Counterclaim Defendant or done at his direction."

RESPONSE:

Plaintiff repeats and incorporates by this reference the General Objections and Objections to Definitions and Instruction above, as though set forth in full. 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 is overly broad and unduly burdensome taking into account the needs of the case, including because it seeks "all" documents and communications. Plaintiff further objects to this Request as harassing because it seeks information unrelated to the subject matter of this case. 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 seeks documents that are protected by the attorney-client privilege, work-product doctrine, or any other applicable privilege, immunity, or protection. Plaintiff further objects to this Request on the grounds that it seeks private or confidential documents. Plaintiff further objects to this Request on the grounds that it is duplicative of other discovery. Plaintiff further objects to this Request to the extent it calls for a legal conclusion. Plaintiff further objects that the Request is unreasonably broad and vague in that it seeks all documents "supporting, refuting, or otherwise related to" a statement. Plaintiff objects that Defendant has failed to describe reasonably identifiable

categories of documents for production and instead has improperly attempted to shift the burden to Plaintiff to analyze what documents might be deemed to "support, refute, or otherwise relate" to a particular statement, which implicates the work product of counsel. Plaintiff further objects to the Request as being unduly cumulative and harassing. Plaintiff further objects to this Request on the grounds that it openly seeks documents related to Mr. Waldman that are protected by the attorney-client privilege and work-product doctrine, and are not subject to discovery in this action. Defendant has articulated no valid basis to seek privileged materials. Plaintiff further objects that the Request is vague, ambiguous, and unintelligible.

28. Please produce all photographs and deleted photographs of Mr. Depp's fingers, finger injury, severed finger, or hands on Mr. Depp's Devices during the time period of March 1-19, 2015, in native form with all metadata.

RESPONSE:

Plaintiff repeats and incorporates by this reference the General Objections and Objections to Definitions and Instruction above, as though set forth in full. 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 is overly broad and unduly burdensome taking into account the needs of the case. Plaintiff further objects to this Request as harassing because it seeks information unrelated to the subject matter of this case, especially in light of the Court's denial of Ms. Heard's motion to compel Mr. Depp's devices for forensic imaging. November 8, 2021 Order, ¶ 1. Plaintiff further objects to this Request on the grounds that it is lacking in reasonable particularity. Plaintiff further objects to this Request to the extent that it could be construed to seek documents that are protected by the attorney-client privilege, work-product doctrine, or any other applicable privilege, immunity, or protection. Plaintiff further objects to this Request to the extent that it could be construed to demand an imaging of any device in his possession,

private or confidential documents. Plaintiff further objects to this Request on the grounds that it is duplicative of other discovery. Plaintiff further objects that the term "Mr. Depp's Devices" is inappropriate and overbroad, because, among other reasons, it has been defined to include devices belonging to third parties to this litigation. Plaintiff further objects that this Request is duplicative of discovery that has already been denied by the Court. Plaintiff will not produce his original devices for forensic imaging. This request was squarely before the Court and the Court denied Ms. Heard's request, stating: "as far as mutuality goes, because it's ordered in one case for one side, I'm -- I'm going to deny that request at this time. There still has to be a ***nexus*** shown when -- when you're asking for those types of items in discovery." November 8, 2021 Order at 68:13-18 (emphasis added). Plaintiff further objects that this Request is duplicative of numerous other discovery requests, and appears calculated to harass.

32. Please produce all communications on Mr. Depp's devices between February 17-March 19, 2015 referring to, reflecting, or otherwise relating to Mr. Depp's fingers, finger injury, severed finger, or hands.

RESPONSE:

Plaintiff repeats and incorporates by this reference the General Objections and Objections to Definitions and Instruction above, as though set forth in full. 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 is overly broad and unduly burdensome taking into account the needs of the case. Plaintiff further objects to this Request as harassing because it seeks information unrelated to the subject matter of this case, especially in light of the Court's denial of Ms. Heard's motion to compel Mr. Depp's devices for forensic imaging. November 8, 2021 Order, ¶ 1. 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 seeks documents that are protected by the attorney-client privilege, work-product doctrine, or any other applicable privilege, immunity, or protection. Plaintiff further objects to this Request to the extent that it could be construed to demand an imaging of any device in his possession, custody, or control, which has already been denied by the Court and is not appropriate or warranted under the circumstances of this case. Plaintiff further objects to this Request on the grounds that it seeks private or confidential documents. Plaintiff further objects to this Request on the grounds that it is duplicative of other discovery. Plaintiff further objects that the term "Mr. Depp's Devices" is inappropriate and overbroad, because, among other reasons, it has been defined to include devices belonging to third parties to this litigation. Plaintiff further objects to this Request on the grounds that it is unreasonably overbroad and harassing.

Subject to and without waiving the foregoing objections, Plaintiff responds as follows: Plaintiff will produce or has already produced all non-privileged communications relating to Mr. Depp's finger injury.

33. Please produce all photographs and deleted photographs of Mr. Depp on Mr. Depp's Devices between February 17-March 19, 2015, in native form with all metadata.

RESPONSE:

Plaintiff repeats and incorporates by this reference the General Objections and Objections to Definitions and Instruction above, as though set forth in full. 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 is overly broad and unduly burdensome taking into account the needs of the case. Plaintiff further objects to this Request as harassing because it seeks information unrelated to the subject matter of this case, especially in light of the Court's denial

particularity. Plaintiff further objects to this Request to the extent that it could be construed to seek documents that are protected by the attorney-client privilege, work-product doctrine, or any other applicable privilege, immunity, or protection. Plaintiff further objects to this Request on the grounds that it demands an imaging of any device in his possession, custody, or control, which has already been denied by the Court and is not appropriate or warranted under the circumstances of this case. Plaintiff further objects to this Request on the grounds that it seeks private or confidential documents. Plaintiff further objects to this Request on the grounds that it is duplicative of other discovery. Plaintiff further objects that the term "Mr. Depp's Devices" is inappropriate and overbroad, because, among other reasons, it has been defined to include devices belonging to third parties to this litigation. Plaintiff further objects that this Request is duplicative of discovery that has already been denied by the Court. Plaintiff further objects that this Request seeks to impose burdens beyond those imposed under applicable law, and no legitimate basis has been shown to seek a forensic imaging of Mr. Depp's devices. Plaintiff further objects that this Request is duplicative of discovery that has already been denied by the Court. Plaintiff will not produce his original devices for forensic imaging. This request was squarely before the Court and the Court denied Ms. Heard's request, stating: "as far as mutuality goes, because it's ordered in one case for one side, I'm -- I'm going to deny that request at this time. There still has to be a ***nexus*** shown when -- when you're asking for those types of items in discovery." November 8, 2021 Order at 68:13-18 (emphasis added). Plaintiff further objects that the Request is overbroad, duplicative, and appears calculated to harass.

37. Any payments made by Mr. Depp, any of Mr. Depp's entities, or agents, to anyone asserting claims against Mr. Depp.

RESPONSE:

Plaintiff repeats and incorporates by this reference the General Objections and Objections to Definitions and Instruction above, as though set forth in full. 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 is overly broad and unduly burdensome taking into account the needs of the case. Plaintiff further objects to this Request as harassing because it seeks information unrelated to the subject matter of this case. 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 seeks documents that are protected by the attorney-client privilege, work-product doctrine, or any other applicable privilege, immunity, or protection. Plaintiff further objects to this Request on the grounds that it seeks private or confidential documents. Plaintiff further objects to this Request on the grounds that it is duplicative of other discovery. Plaintiff further objects to this Request on the grounds that it seeks documents that are subject to Protective Order; subject to confidentiality agreement(s); subject to the mediation privilege; subject to the settlement communication privilege; or are otherwise protected from disclosure. Plaintiff further objects to this Request on the grounds that it is patently overbroad and appears calculated to harass.

38. All documents that constitute, refer to or relate to video and/or audio recordings, photographs and/or images of Ms. Heard, including any copies of anything recorded by Mr. Depp or any of his entities, representatives or agents.

RESPONSE:

Plaintiff repeats and incorporates by this reference the General Objections and Objections to Definitions and Instruction above, as though set forth in full. 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 is overly broad and unduly burdensome taking into account the needs of the case. Plaintiff further objects to this Request as harassing because it seeks information unrelated to the subject matter of this case. 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 seeks documents that are protected by the attorney-client privilege, work-product doctrine, or any other applicable privilege, immunity, or protection. Plaintiff further objects to this Request on the grounds that it seeks private or confidential documents. Plaintiff further objects to this Request on the grounds that it is duplicative of other discovery. Plaintiff further objects to this Request to the extent it seeks documents not within his possession, custody, or control. Plaintiff further objects to this Request on the grounds that the very nature of this Request is vague, ambiguous, unintelligible, and overbroad, including because it seeks "all documents that constitute, refer to or relate to video and/or audio recordings, photographs and/or images of Ms. Heard, including any copies of anything recorded by Mr. Depp or any of his entities, representatives or agents." Plaintiff further objects that the Request is unreasonably overbroad, vague and ambiguous, and duplicative of other discovery.

39. All documents that refer or relate to any consumption or possible consumption of alcohol or drug use, or abuse, by Mr. Depp.

RESPONSE:

Plaintiff repeats and incorporates by this reference the General Objections and Objections to Definitions and Instruction above, as though set forth in full. 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 is overly broad and unduly burdensome taking into account the

needs of the case. Plaintiff further objects to this Request as harassing because it seeks information unrelated to the subject matter of this case. 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 seeks documents that are protected by the attorney-client privilege, work-product doctrine, or any other applicable privilege, immunity, or protection. Plaintiff further objects to this Request on the grounds that it seeks private or confidential documents. Plaintiff further objects to this Request on the grounds that it is duplicative of other discovery. Plaintiff further objects to this Request to the extent it seeks documents not within his possession, custody, or control. Plaintiff further objects to this Request on the grounds that the very nature of this Request is vague, ambiguous, unintelligible, and overbroad, including because it seeks documents relating to "possible consumption of alcohol or drug use, or abuse, by Mr. Depp." Plaintiff further objects that the Request implicates Mr. Depp's medical privacy rights and the patient-physician privilege. Plaintiff further objects that the Request is unlimited as to time. Plaintiff further objects that the Request is duplicative of other discovery and appears calculated to harass.

40. All documents referring or relating to any instances or possible instances of issues with anger, anger management, shouting, yelling, scolding or speaking in a harsh tone, by Mr. Depp toward any person, including Ms. Heard or other females, any acquaintances, friends, dates, employees, or contractors of Mr. Depp or his companies, photographers, videographers, news reporters, and/or strangers.

RESPONSE:

Plaintiff repeats and incorporates by this reference the General Objections and Objections to Definitions and Instruction above, as though set forth in full. 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 is overly broad and unduly burdensome taking into account the

needs of the case. Plaintiff further objects to this Request as harassing because it seeks information unrelated to the subject matter of this case. 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 seeks documents that are protected by the attorney-client privilege, work-product doctrine, or any other applicable privilege, immunity, or protection. Plaintiff further objects to this Request on the grounds that it seeks private or confidential documents. Plaintiff further objects to this Request on the grounds that it is duplicative of other discovery. Plaintiff further objects to this Request to the extent it seeks documents not within his possession, custody, or control. Plaintiff further objects to this Request on the grounds that the very nature of this Request is vague, ambiguous, unintelligible, and overbroad, including because it seeks documents relating to "possible instances of issues with anger, anger management, shouting, yelling, scolding or speaking in a harsh tone, by Mr. Depp toward any person." Plaintiff further objects on the grounds that the Request completely fails to set forth any category of documents with reasonable particularity. Plaintiff further objects on the grounds that the Request seeks documents with no legitimate nexus to this action and appears calculated to harass.

41. All documents relating in any manner to Mr. Depp's efforts to cover up, deny, falsify or misrepresent facts or events reflecting negatively upon him.

RESPONSE:

Plaintiff repeats and incorporates by this reference the General Objections and Objections to Definitions and Instruction above, as though set forth in full. 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 is overly broad and unduly burdensome taking into account the

needs of the case. Plaintiff further objects to this Request as harassing because it seeks information unrelated to the subject matter of this case. 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 seeks documents that are protected by the attorney-client privilege, work-product doctrine, or any other applicable privilege, immunity, or protection. Plaintiff further objects to this Request on the grounds that it seeks private or confidential documents. Plaintiff further objects to this Request on the grounds that it is duplicative of other discovery. Plaintiff further objects to this Request to the extent it seeks documents not within his possession, custody, or control. Plaintiff further objects on the grounds that the Request completely fails to set forth any category of documents with reasonable particularity. Plaintiff further objects on the grounds that the Request seeks documents with no legitimate nexus to this action and appears calculated to harass. Plaintiff further objects to the Request on the grounds that it assumes facts not in evidence and lacks foundation for the same.

42. All documents that refer or relate to any instances or possible instances of physical violence by Mr. Depp toward any person or property, including any photographs, videos, drawing, or other descriptions.

RESPONSE:

Plaintiff repeats and incorporates by this reference the General Objections and Objections to Definitions and Instruction above, as though set forth in full. 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 is overly broad and unduly burdensome taking into account the needs of the case. Plaintiff further objects to this Request as harassing because it seeks information unrelated to the subject matter of this case. Plaintiff further objects to this Request on the grounds that it is lacking in reasonable particularity. Plaintiff further objects to this

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43. All documents that refer or relate to any complaints and/or criticisms against or about Mr. Depp by any person of any nature, from January 1, 2009 until the present.

RESPONSE:

Plaintiff repeats and incorporates by this reference the General Objections and Objections to Definitions and Instruction above, as though set forth in full. 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 is overly broad and unduly burdensome taking into account the needs of the case. Plaintiff further objects to this Request as harassing because it seeks information unrelated to the subject matter of this case. 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 seeks documents that are protected by the attorney-client privilege, work-product doctrine, or any other applicable privilege, immunity, or protection. Plaintiff further objects to this Request on the grounds that it seeks private or confidential documents. Plaintiff further objects to this Request on the grounds that it is duplicative of other discovery. Plaintiff further objects to this Request to the extent it seeks documents not within his possession, custody, or control. Plaintiff further objects to this Request as vague, ambiguous, and overbroad, including because it seeks "all" documents relating to "complaints and/or criticisms against or about Mr. Depp *by any person of any nature* from January 1, 2009 until the present," a twelve-year time period. Plaintiff further objects on the grounds that the Request completely fails to set forth any category of documents with reasonable particularity. Plaintiff further objects on the grounds that the Request seeks documents with no legitimate nexus to this action and appears calculated to harass. Plaintiff further objects to the Request on the grounds that it assumes facts not in evidence and lacks foundation for the same.

44. All documents that refer or relate to any legal matter, demands, claims or allegations made against, about or involving Mr. Depp respecting or by any person or entity from January 1, 2009 until the present.

RESPONSE:

Plaintiff repeats and incorporates by this reference the General Objections and Objections to Definitions and Instruction above, as though set forth in full. 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 is overly broad and unduly burdensome taking into account the needs of the case. Plaintiff further objects to this Request as harassing because it seeks information unrelated to the subject matter of this case. 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 seeks documents that are protected by the attorney-client privilege, work-product doctrine, or any other applicable privilege, immunity, or protection. Plaintiff further objects to this Request on the grounds that it seeks private or confidential documents. Plaintiff further objects to this Request on the grounds that it is duplicative of other discovery. Plaintiff further objects to this Request to the extent it seeks documents not within his possession, custody, or control. Plaintiff further objects to this Request as vague, ambiguous, and overbroad, including because it seeks "all" documents relating to "any legal matter, demands, claims or allegations made against, about or involving Mr. Depp respecting or by any person or entity from January 1, 2009 until the present," a twelve-year time period. Plaintiff further objects on the grounds that the Request completely fails to set forth any category of documents with reasonable particularity. Plaintiff further objects on the grounds that the Request seeks documents with no legitimate nexus to this action and appears calculated to harass. Plaintiff further objects to the Request on the grounds that it assumes facts not in evidence and lacks foundation for the same. Plaintiff further objects that the Request seeks documents that have been previously sought by Defendant and denied by the Court. Plaintiff further objects on the grounds that the Request seeks documents that are subject to protective orders, mediation privilege, confidentiality requirements, or otherwise protected from disclosure.

45. All documents that may impact negatively on Mr. Depp or Mr. Depp's reputation.

RESPONSE:

Plaintiff repeats and incorporates by this reference the General Objections and Objections to Definitions and Instruction above, as though set forth in full. 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 is overly broad and unduly burdensome taking into account the

needs of the case. Plaintiff further objects to this Request as harassing because it seeks information unrelated to the subject matter of this case. 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 seeks documents that are protected by the attorney-client privilege, work-product doctrine, or any other applicable privilege, immunity, or protection. Plaintiff further objects to this Request on the grounds that it seeks private or confidential documents. Plaintiff further objects to this Request on the grounds that it is duplicative of other discovery. Plaintiff further objects to this Request to the extent it seeks documents not within his possession, custody, or control. Plaintiff further objects to this Request as vague, ambiguous, and overbroad, including because it seeks "all" documents that "*may* impact negatively on Mr. Depp or Mr. Depp's reputation." Plaintiff further objects on the grounds that the Request completely fails to set forth any category of documents with reasonable particularity. Plaintiff further objects on the grounds that the Request seeks documents with no legitimate nexus to this action and appears calculated to harass. Plaintiff further objects to the Request on the grounds that it assumes facts not in evidence and lacks foundation for the same. Plaintiff further objects that the Request seeks documents that have been previously sought by Defendant and denied by the Court. Plaintiff further objects on the grounds that the Request seeks documents that are subject to protective orders, mediation privilege, confidentiality requirements, or otherwise protected from disclosure.

46. All documents reflecting the settlement terms in any litigation involving Mr. Depp.

RESPONSE:

Plaintiff repeats and incorporates by this reference the General Objections and Objections to Definitions and Instruction above, as though set forth in full. 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 is overly broad and unduly burdensome taking into account the needs of the case. Plaintiff further objects to this Request as harassing because it seeks information unrelated to the subject matter of this case. 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 seeks documents that are protected by the attorney-client privilege, work-product doctrine, or any other applicable privilege, immunity, or protection, including relevant protective orders entered in any litigation involving Mr. Depp. Plaintiff further objects to this Request on the grounds that it seeks private or confidential documents. Plaintiff further objects to this Request on the grounds that it is duplicative of other discovery. Plaintiff further objects to this Request to the extent it seeks documents not within his possession, custody, or control. Plaintiff further objects on the grounds that the Request completely fails to set forth any category of documents with reasonable particularity. Plaintiff further objects on the grounds that the Request seeks documents with no legitimate nexus to this action and appears calculated to harass. Plaintiff further objects to the Request on the grounds that it assumes facts not in evidence and lacks foundation for the same. Plaintiff further objects that the Request seeks documents that have been previously sought by Defendant and denied by the Court. Plaintiff further objects on the grounds that the Request seeks documents that are subject to protective orders, mediation privilege, confidentiality requirements, or otherwise protected from disclosure.

Dated: December 10, 2021

Respectfully submitted,

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Counsel for Plaintiff and
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CERTIFICATE OF SERVICE

I hereby certify that on this 10th day of December 2021, I caused copies of the foregoing to be served via email (per written agreement between the Parties) on the following:

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Andrew Crawford

Andrew C. Crawford (VSB #89093)

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 Defendant and Counterclaim-Plaintiff Amber Laura Heard's ("Ms. Heard") Motion to Compel Responses to Eleventh and Twelfth Requests for Production of Documents to Plaintiff and Counterclaim-Defendant John C. Depp, II ("Mr. Depp") (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 the hearing; and it is further

ORDERED that the Motion to Compel Request 9 of Ms. Heard's 12th Set of Requests for Production is denied; and it is further

ORDERED that the Motion to Compel Requests 20-21 and 24-30 of Ms. Heard's 11th Set of Requests for Production is denied; and it is further

ORDERED that the Motion to Compel Requests 22, 23, and 31 of Ms. Heard's 11th Set of Requests for Production is denied; and it is further

ORDERED that for Interrogatories 9-10 of Ms. Heard's 1st Set of Interrogatories and Interrogatories 1-2 of Ms. Heard's 2nd Set of Interrogatories Mr. Depp shall identify responsive documents by BATES number; and it is further

ORDERED that the Motion to Compel Request 7 of Ms. Heard's 12th Requests is granted in part and denied in part, as follows: with respect to Interrogatory 11 of Ms. Heard's First Set of Interrogatories, Mr. Depp shall produce any nonprivileged documents reflecting consumption of drugs, alcohol, or medications on the dates of alleged abuse of Ms. Heard, if any exist within his possession custody or control and have not previously been produced; with respect to Interrogatory 13 of Ms. Heard's First Set of Interrogatories, Mr. Depp shall produce a fully executed copy of his separation agreement with Vanessa Paradis, to the extent a fully executed copy exists in Mr. Depp's possession, custody, or control; with respect to Interrogatory No. 14, Mr. Depp shall produce nonprivileged pictures, recordings, or other documentation of the alleged incident between Mr. Depp and Mr. Brooks; with respect to Interrogatory No. 17, the Motion is denied; and it is further

ORDERED that the Motion to Compel Requests 5 and 6 of Ms. Heard's 12th Requests for Production is granted in part, and Mr. Depp shall admit or deny the authenticity of the documents in Ms. Heard's 4th and 5th Requests for Admissions, and for those denied by Mr. Depp shall produce all nonprivileged documents, if any, supporting such denials; and it is further

ORDERED that that the Motion to Compel Request 2 of Ms. Heard's 12th Requests is denied; and it is further

ORDERED that the Motion to Compel Requests 45, 61, 63-64, 67, and 80 of Ms. Heard's 11th Set of Requests for Production is granted, and Mr. Depp shall produce all non-privileged responsive documents to these Requests; and it is further

ORDERED that the Motion to Compel Requests 34-44, 46-60, 62, 65-66, 68-79, 81-88 of Ms. Heard's 11th Set of Requests for Production are denied; and it is further

ORDERED that Mr. Depp shall produce all documents responsive to the above Requests by Monday, January 3, 2022.

SO ORDERED.

December 17, 2021

[redacted]

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 AGREED TO IN PART AND OBJECTED TO IN PART FOR THE REASONS STATED IN BRIEFING AND ORAL ARGUMENT:

Elaine Charlson Bredehoft (VSB No. 23766)
Adam S. Nadelhaft (VSB No. 91717)
Clarissa K. Pintado (VSB No. 86882)
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Counsel to Defendant/Counterclaim Plaintiff, Amber Laura Heard

SEEN AND _____:

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

DEFENDANT AND COUNTERCLAIM-PLAINTIFF AMBER LAURA HEARD'S MEMORANDUM IN SUPPORT OF MOTION TO COMPEL RESPONSES TO 3RD RFAs AND 14TH, 16TH AND 17TH RFPs TO PLAINTIFF AND COUNTERCLAIM-DEFENDANT JOHN C. DEPP, II

ATTACHMENT 6

FILED UNDER SEAL

(Pursuant to the Stipulated Amended Protective Order entered by the Court on June 21, 2021)

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Transcript of Hearing

Date: October 29, 2021
Case: Depp, II -v- Heard

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www.planetdepos.com

VIRGINIA:

IN THE CIRCUIT COURT OF FAIRFAX COUNTY

----------x

JOHN C. DEPP, II, :

Plaintiff, :

v. : Case No.

AMBER LAURA HEARD, : CL-2019-0002911

Defendant. :

----------x

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HEARING

Before the Honorable PENNEY AZCARATE

Fairfax, Virginia

Friday, October 29, 2021

11:35 a.m.

Job No.: 409115

Pages: 1 - 71

Reported by: Carol A. Lowe, RPR

A P P E A R A N C E S

ON BEHALF OF THE PLAINTIFF:

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A P P E A R A N C E S C O N T I N U E D

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movement.

And Mr. Depp, I respectfully submit, should be able to test the veracity of these photographs that are being used to hang him. The images are easily manipulated, as Mr. Neumeister has testified. And Mr. Ackert knows they can be. And that's another reason why it's necessary to do this.

And finally, Your Honor, I think Mr. Rottenborn -- and I like Mr. Rottenborn, but I think his last point about the RFAs really proves why we need the -- the extraction and imaging here.

They ask -- they -- they gave these 200 photographs. And -- and they come fast and furious as do the allegations. In no way do we agree or concede that any of these other incidents which change with the weather are -- are true.

We are called to task because we won't admit that these fake photographs that were produced by Ms. Heard are authentic. How can we? How can we admit or deny? We don't know. Once we

have the forensic imaging we can admit or deny. And we'll be happy to do that.

Mr. Neumeister is not a hired gun. He is out for the truth. The logo for their company is In Data There Is Truth. We just want to know what's real and what's fake. And because they are an essential part of Mr. Depp's defense in this case and an essential part of Ms. Heard's 100 million dollar counterclaim -- she says it's not a hoax.

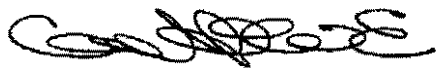
Well, then prove it. Prove it's not a hoax. If these are real photographs, well, then, you know, we're going to be in a much different situation. But if these are real photographs, she should want to be able to prove them.

And if she doesn't have her -- her device from 2012, well, then that's the answer. She can only produce for imaging and extraction what she's got; but then she's going to have another argument as to what happened and whether that's spoliation or not.

But, Your Honor, we have bent over

CERTIFICATE OF SHORTHAND REPORTER

I, CAROL A. LOWE, the court reporter before whom the foregoing hearing was taken, do hereby certify that the foregoing transcript is a true and correct record of the proceedings; that said proceedings were taken by me stenographically and thereafter reduced to typewriting under my supervision; and that I am neither counsel for, related to, nor employed by any of the parties to this case and have no interest, financial or otherwise, in its outcome.



Carol A. Lowe, RPR

DEFENDANT AND COUNTERCLAIM-PLAINTIFF AMBER LAURA HEARD'S MEMORANDUM IN SUPPORT OF MOTION TO COMPEL RESPONSES TO 3RD RFAs AND 14TH, 16TH AND 17TH RFPs TO PLAINTIFF AND COUNTERCLAIM-DEFENDANT JOHN C. DEPP, II

ATTACHMENT 7

FILED UNDER SEAL

(Pursuant to the Stipulated Amended Protective Order entered by the Court on June 21, 2021)

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Transcript of Hearing A

Date: January 7, 2022
Case: Depp, II -v- Heard

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VIRGINIA:

IN THE CIRCUIT COURT OF FAIRFAX COUNTY

----------x

JOHN C. DEPP, II, :

Plaintiff, :

v. : Case No.

AMBER LAURA HEARD, : CL-2019-0002911

Defendant. :

----------x

CONFIDENTIAL - UNDER SEAL

HEARING

Before the Honorable PENNEY AZCARATE

Fairfax, Virginia

Friday, January 7, 2022

12:14 p.m.

Job No.: 423027

Pages: 1 - 70

Reported by: Carol A. Lowe, RPR

A P P E A R A N C E S

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we need this information. Thank you.

THE COURT: All right. Yes, sir.

MR. MURPHY: Thank you, Your Honor.

So as to -- if -- unless the Court wishes me to, I'm not going to read that list --

THE COURT: No.

MR. MURPHY: -- of RFPs again. We all know what we're talking about.

THE COURT: Right.

MR. MURPHY: As reflected in Ms. Heard's opposition and in the chart, Ms. Heard is not opposing producing these documents with just two qualifications.

The first is "relate to" which is overbroad; same as before. We -- we agreed to "referring to" or "reflecting." That was in the consent order exchange which wasn't agreed to. It was briefed, attached in the proposed order and now in this chart.

The only thing we're asking for here -- and this will come up. We can probably shortcut the next group -- few groups as well -- is we

have -- Ms. Heard has pending RFPs for these same issues.

With respect to the Court's available Fridays, we're not going to be able to get these documents in a motion until mid February. And Ms. -- what possible reason could Mr. Depp have to not produce documents referring to these same incidents of abuse? That -- that's all we're asking for here.

And in the past Your Honor has ruled against Ms. Heard saying you're not similarly situated; but in these instances, I mean, these are the incidents of abuse that at least have been in -- in those statements so far. There are others. But why on earth would Mr. Depp refuse to produce those same documents?

And the next two sets -- I don't know if Your Honor wants to hear now, but I think we can take care of those. These are the exact same issues. It's more overbroad because they use "relate in any way to." That's the only objection to the RFP.

THE COURT: Okay.

MR. MURPHY: And then in addition to that, the same thing; documents referring to Ms. Heard on these same dates or in then the next set, documents referring to Ms. Heard within 10 days after.

That's all that's in dispute here. And rather than take up time with -- with lengthy emails between myself and -- and Mr. Chew's associate, taking up Mr. Cochran's time, taking up another court motion -- and we believe Mr. Depp will not produce these documents absent -- because he knows the Court can't compel them until mid February which means they won't be produced until close to or after the discovery cutoff -- let's just address this now.

And that's the only remaining issue in addition to the "relate in any way to" language for those RFPs.

THE COURT: Okay. All right. Yes, sir.

MR. CHEW: Yes, Your Honor. With respect to the incidents, these are particular

incidents of abuse that Ms. Heard has made. I don't think "relate to" is overbroad in this context. These are the things that have destroyed his career. These are accusations of the most vile crime. And we -- we think "relate to" is -- is appropriate.

With respect to Ms. Heard's request, it's not appropriate. It's not before the Court. She has her own motion to compel that she'll -- you know, is coming up. And it -- it's -- it's just not appropriate.

The -- the parties are in some ways similarly situated. In some ways they're not. And -- and it's -- it's a little more nuanced than that. And it's not before us now. And we respectfully submit that the Court should order these documents, all of the documents responsive to these requests, produced by January 21.

With respect to what Mr. Depp is gaming, I mean, that's ridiculous. That's not how we operate. That's maybe how some people operate. It's not how we operate. Mr. Depp has appeared

CERTIFICATE OF SHORTHAND REPORTER

I, CAROL A. LOWE, the court reporter before whom the foregoing hearing was taken, do hereby certify that the foregoing transcript is a true and correct record of the proceedings; that said proceedings were taken by me stenographically and thereafter reduced to typewriting under my supervision; and that I am neither counsel for, related to, nor employed by any of the parties to this case and have no interest, financial or otherwise, in its outcome.

Carol A. Lowe, RPR

David Murphy

From: Crawford, Andrew C. <ACrawford@brownrudnick.com>
Sent: Tuesday, January 25, 2022 7:29 AM
To: David Murphy
Cc: Elaine Bredehoft; Adam Nadelhaft; [redacted]
Subject: RE: Depp v. Heard- Conciliation on Requests for Production and Requests for Admission

Understood. I will review and do my best to be prepared to discuss.

From: David Murphy <DMurphy@cbcblaw.com>
Sent: Tuesday, January 25, 2022 7:22 AM
To: Crawford, Andrew C. <ACrawford@brownrudnick.com>
Cc: Elaine Bredehoft <ebredehoft@charlsonbredehoft.com>; Adam Nadelhaft <anadelhaft@cbcblaw.com>; [redacted]
Subject: RE: Depp v. Heard- Conciliation on Requests for Production and Requests for Admission

Andrew,

As to the 3rd RFAs, they were served in October 2020, meet and confers occurred long ago, and we have been pursuing appropriate "admit or deny" responses from Mr. Depp for over 11 months. The relief sought by Ms. Heard could not be more straightforward, and is the same scope as recently Ordered by the Court. This should not be controversial. Either Mr. Depp will agree to this relief, or Ms. Heard will be forced to seek the same relief from the Court once again.

As we have repeatedly suggested in this email chain, please review Ms. Heard's Consent Orders on these 14th, 16th, and 17th RFPs, as we are not intending to meet and confer on every RFP today. Some of the 14th and 16th RFPs are part of tomorrow's Motion, and we are only including the 17th RFPs that overlap with the relief recently granted by the Court during Mr. Depp's January 7 Motion. We will revisit the other 17th RFPs in a later meet and confer, followed by conciliation. Ms. Heard sent these Consent Orders weeks ago, which revise our RFPs to bring them within the scope of the Court's recent discovery Orders. So Mr. Depp should be fully prepared to discuss them and attempt to reach resolution without Court intervention. This is the purpose of a meet and confer.

I have been asking for weeks for Mr. Depp to review these Consent Orders and be prepared to substantively discuss them, but unfortunately it appears Mr. Depp is not prepared to do so. These are very straightforward matters that do not require going back to "discuss internally," nor do they require such an extensive review of the initially served RFPs.

Thank you,

David E. Murphy
Charlson Bredehoft Cohen Brown & Nadelhaft, P.C.
11260 Roger Bacon Drive, Suite 201
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PH: (703) 318-6800
FX: (703) 318-6808

From: Crawford, Andrew C. <ACrawford@brownrudnick.com>
Sent: Tuesday, January 25, 2022 7:03 AM
To: David Murphy <DMurphy@cbcblaw.com>
Subject: RE: Depp v. Heard- Conciliation on Requests for Production and Requests for Admission

Thanks David. Stephanie may be joining but no one else from our side. FYI I will not be prepared to discuss the RFAs. I am prepared to discuss your 14th and 16th RFPs. I am trying to work through your 17th RFPs. As you know, there are nearly 300 of them.

From: David Murphy <DMurphy@cbcblaw.com>
Sent: Tuesday, January 25, 2022 6:24 AM
To: Crawford, Andrew C. <ACrawford@brownrudnick.com>; Moniz, Samuel A. <SMoniz@brownrudnick.com>; [redacted]
Cc: Calnan, Stephanie <SCalnan@brownrudnick.com>; Elaine Bredehoft <ebredehoft@charlsonbredehoft.com>; Adam Nadelhaft <anadelhaft@cbcblaw.com>; Rottenborn, Ben <brottenborn@woodsrogers.com>; Vasquez, Camille M. <CVasquez@brownrudnick.com>
Subject: RE: Depp v. Heard- Conciliation on Requests for Production and Requests for Admission

Andrew,

9 AM today works. I will circulate a dial-in to this group, as I am not sure who is joining from your side. I look forward to working through the RFAs and each of the RFPs in Ms. Heard's proposed Consent Orders, and hope Mr. Depp will have specific responses or proposals on each Request so this can be a productive meet and confer. I also look forward to receiving Mr. Depp's revised 9th RFPs that comply with the Court's recent discovery Orders to further ensure a productive meet and confer.

Thank you,

David E. Murphy

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Reston, Virginia 20190
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FX: (703) 318-6808

From: Crawford, Andrew C. <ACrawford@brownrudnick.com>
Sent: Monday, January 24, 2022 9:35 PM
To: David Murphy <DMurphy@cbcblaw.com>; Moniz, Samuel A. <SMoniz@brownrudnick.com>; [redacted]
Cc: Calnan, Stephanie <SCalnan@brownrudnick.com>; Elaine Bredehoft <ebredehoft@charlsonbredehoft.com>; Adam Nadelhaft <anadelhaft@cbcblaw.com>; Rottenborn, Ben <brottenborn@woodsrogers.com>; Vasquez, Camille M. <CVasquez@brownrudnick.com>
Subject: RE: Depp v. Heard- Conciliation on Requests for Production and Requests for Admission

Hi David,

Are you available at 9:00 a.m. tomorrow for a call?

Thanks,
Andrew

From: David Murphy <DMurphy@cbcblaw.com>
Sent: Monday, January 24, 2022 5:59 PM
To: Moniz, Samuel A. <SMoniz@brownrudnick.com>; Crawford, Andrew C. <ACrawford@brownrudnick.com>; [redacted]
Cc: Calnan, Stephanie <SCalnan@brownrudnick.com>; Elaine Bredehoft <ebredehoft@charlsonbredehoft.com>; Adam Nadelhaft <anadelhaft@cbcblaw.com>; Rottenborn, Ben <brottenborn@woodsrogers.com>; Vasquez, Camille M. <CVasquez@brownrudnick.com>
Subject: RE: Depp v. Heard- Conciliation on Requests for Production and Requests for Admission

Sam,

I suggest you re-read these emails before responding in haste. I have been proposing dates and times for this call for weeks, but you have repeatedly not responded with agreement to any. The most recent proposals were for a call this afternoon, along with any time tomorrow.

You also continue to ignore that you have never proposed any revisions to Mr. Depp's 9th RFPs to bring them into compliance with the Court's recent discovery Orders, and we again request you do so. Ms. Heard did this weeks ago, and you have possessed those draft Consent Orders for some time.

Once again, please let us know when you are available tomorrow, and we can follow up with a Conciliation call **with [redacted] on Wednesday afternoon or Thursday if that works for [redacted]**

David E. Murphy
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From: Moniz, Samuel A. <SMoniz@brownrudnick.com>
Sent: Monday, January 24, 2022 5:38 PM
To: David Murphy <DMurphy@cbcblaw.com>; Crawford, Andrew C. <ACrawford@brownrudnick.com>; [redacted]
Cc: Calnan, Stephanie <SCalnan@brownrudnick.com>; Elaine Bredehoft <ebredehoft@charlsonbredehoft.com>; Adam Nadelhaft <anadelhaft@cbcblaw.com>; Rottenborn, Ben <brottenborn@woodsrogers.com>; Vasquez, Camille M. <CVasquez@brownrudnick.com>
Subject: RE: Depp v. Heard- Conciliation on Requests for Production.

David—

Just propose a date and time for a call. There's no need for all this.

Unfortunately, I need to clarify some misstatements in your email. It is false of you to state that I "acknowledged" that our RFA responses were "deficient." Our RFA responses are fully appropriate, as I have previously explained to you on multiple occasions. Purely as a compromise, and to avoid giving Ms. Heard's counsel an opportunity to waste everyone's time with another pointless motion, we agreed to serve supplemental responses. That is not a concession that your position has merit.

It is also patently inaccurate of you to say that I never followed up on my email on our 9th RFPs, which has been sitting unanswered in your inbox since last October. I have repeatedly raised the 9th RFPs with your office, by phone and email, and you have repeatedly ignored emails and stated that you were unprepared to discuss them on calls. Never once have you provided a substantive response.

In addition, the Third RFAs are different from the Fourth and Fifth. The Third RFAs contain requests for admissions as to pictures taken by Ms. Heard, the veracity and authenticity of which we do not accept. They are also the subject of ongoing analysis by our experts. Our responses are appropriate and fully consistent with Virginia law, but we can discuss, if you would like to explain your position.

We also disagree that you are next in line to file, and object to your attempt to short circuit the conciliation process. You filed the most recent motion, which is set to be heard this week, and our RFPs predate yours.

Sam

brownrudnick

Samuel A. Moniz
Associate

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F: 949-486-3671
smoniz@brownrudnick.com
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From: David Murphy <DMurphy@cbcblaw.com>
Sent: Monday, January 24, 2022 2:14 PM
To: Crawford, Andrew C. <ACrawford@brownrudnick.com>; [redacted]
Cc: Calnan, Stephanie <SCalnan@brownrudnick.com>; Elaine Bredehoft <ebredehoft@charlsonbredehoft.com>; Adam Nadelhaft <anadelhaft@cbcblaw.com>; Rottenborn, Ben <brottenborn@woodsrogers.com>; Vasquez, Camille M. <CVasquez@brownrudnick.com>; Moniz, Samuel A. <SMoniz@brownrudnick.com>
Subject: RE: Depp v. Heard- Conciliation on Requests for Production.

[redacted]and Andrew,

On the 3rd RFAs, we again request you review the draft Consent Order attached to the below emails. It is the *verbatim* language from the Court's recent discovery order as to the 4th-5th RFAs, so we cannot understand any refusal from Mr. Depp when the Court has already ordered this. Mr. Depp's supplemental responses to the 4th-5th RFAs, despite being Court-Ordered, also remain deficient, as acknowledged by Sam when he agreed to serve supplemental responses, even though the date for doing so keeps shifting.

As to the RFPs, Mr. Depp has possessed Ms. Heard's proposed consent orders for some time now, which were revised to comply with the Court's recent discovery rulings. If Mr. Depp wishes to have a parties-only meet and confer tomorrow, we can do that, followed by a Conciliation call with [redacted] on either Wednesday or Thursday if [redacted] is available on those days. But Thursday is far too late for a phone meet and confer. We would also again request that Mr. Depp be prepared to substantively discuss the specifics of Ms. Heard's proposed Consent Orders, along with clear positions on either agreeing or not agreeing to Ms. Heard's proposals on each RFP. It is a waste of everyone's time for Mr. Depp to have to go back and discuss everything "internally" when Ms. Heard's proposals have been in black and white for weeks. [redacted] **Given that our Motion would be next in line for filing, and that we have attempted to meet and confer on these issues with Mr. Depp for 6 weeks, can you please provide a date this week before Friday for conciliation or permission to file our Motion?**

Finally, as noted in our email, Sam raised Mr. Depp's 9th RFPs in that one email and never substantively followed up. Also as noted, Mr. Depp declined to ever address the Court's recent rulings, which moot some of Mr. Depp's 9th RFPs or require revisions to bring them into compliance

with the Court's rulings, and declined to provide any narrowing proposals or reduce them to a consent order. Ms. Heard took all of these actions for her RFPs. We also repeatedly proposed dates and times for a meet and confer on *both parties* RFPs, and this morning was the first time Mr. Depp ever provided a specific date and time for a meet and confer.

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From: Crawford, Andrew C. <ACrawford@brownrudnick.com>
Sent: Monday, January 24, 2022 12:14 PM
To: David Murphy <DMurphy@cbcblaw.com>; [redacted]
Cc: Calnan, Stephanie <SCalnan@brownrudnick.com>; Elaine Bredehoft <ebredehoft@charlsonbredehoft.com>; Adam Nadelhaft <anadelhaft@cbcblaw.com>; Rottenborn, Ben <brottenborn@woodsrogers.com>; Vasquez, Camille M. <CVasquez@brownrudnick.com>; Moniz, Samuel A. <SMoniz@brownrudnick.com>
Subject: RE: Depp v. Heard- Conciliation on Requests for Production.

Hi David,

It is somewhat ironic that you are arguing we have delayed responding to your meet and confers given that you have had our meet and confer request on our 9th RFPs since October and still have not responded substantively, despite repeated requests.

As for the RFAs, please provide us with your position, as I don't believe we've seen any written meet and confer from you on those. Your correspondence has all focused on your RFPs.

If you are declining to meet and confer with us without [redacted] on the call, which we believe is a violation of the conciliation protocol entered by the Court, then we'll wait to hear from [redacted]

Thanks,
Andrew

From: David Murphy <DMurphy@cbcblaw.com>
Sent: Monday, January 24, 2022 8:37 AM
To: Crawford, Andrew C. <ACrawford@brownrudnick.com>; [redacted]
Cc: Calnan, Stephanie <SCalnan@brownrudnick.com>; Elaine Bredehoft <ebredehoft@charlsonbredehoft.com>; Adam Nadelhaft <anadelhaft@cbcblaw.com>; Rottenborn, Ben <brottenborn@woodsrogers.com>
Subject: RE: Depp v. Heard- Conciliation on Requests for Production.

Andrew,

This email chain speaks for itself regarding Mr. Depp's attempts to delay this meet and confer and conciliation, and Thursday is far too late. Ms. Heard has been seeking a meet and confer since December 13, and Mr. Depp has possessed Ms. Heard's specific meet and confer proposals for some time but still declines to substantively respond. It is a waste of everyone's time to schedule a call without [redacted] where Mr. Depp will not commit to anything and have to "discuss internally," despite already possessing the exact narrowed relief sought by Ms. Heard that tracks the Court's prior discovery rulings. These matters are more than ripe for Conciliation, and we will schedule it around [redacted]'s availability.

As to Mr. Depp's 9th RFPs, unlike Ms. Heard, you never followed up by seeking or proposing dates and times for a meet and confer. Unlike Ms. Heard, you have not proposed a single narrowing proposal to reach resolution, nor have you revised Mr. Depp's 9th RFPs to reflect the Court's recent rulings. The Court's recent rulings moot some of your RFPs, and others require revisions to bring them into compliance. Both of these efforts by you would necessarily precede any meet and confer, because the purpose of the meet and confer is to try to resolve the issues, not delay bringing a motion. To enable a more productive call where we might actually reach resolutions without having to go back and "discuss internally," please review and revise your 9th RFPs for compliance with the Court's recent rulings. Then we will be happy to meet and confer with you on these. We have already gone through this process with ours, have already sent you proposed Consent Orders, and our RFAs all significantly pre-date your 9th RFPs (some by a year), and were the next on [redacted]'s list to brought before him, and if not resolved, the subject of a motion to compel.

Ms. Heard respectfully reiterates her request for a Conciliation today after 12 PM, or at any time on Tuesday. [redacted] Please let us know when works for you.

Thank you for your consideration,

David E. Murphy
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Reston, Virginia 20190
PH: (703) 318-6800
FX: (703) 318-6808

From: Crawford, Andrew C. <ACrawford@brownrudnick.com>
Sent: Monday, January 24, 2022 8:14 AM
To: David Murphy <DMurphy@cbcblaw.com>

Cc: Calnan, Stephanie <SCalnan@brownrudnick.com>
Subject: FW: Depp v. Heard- Conciliation on Requests for Production.

Hi David,

Hope you had a nice weekend. Do you have availability on Thursday for a meet and confer?

Thanks,
Andrew

From: Moniz, Samuel A. <SMoniz@brownrudnick.com>
Sent: Friday, January 21, 2022 6:31 PM
To: David Murphy <dmurphy@cbcblaw.com>; Chew, Benjamin G. <BChew@brownrudnick.com>; Vasquez, Camille M. <CVasquez@brownrudnick.com>; Crawford, Andrew C. <ACrawford@brownrudnick.com>; [redacted]
Cc: Elaine Bredehoft <ebredehoft@charlsonbredehoft.com>; Adam Nadelhaft <anadelhaft@cbcblaw.com>; Clarissa Pintado <cpintado@cbcblaw.com>; Michelle Bredehoft <mbredehoft@charlsonbredehoft.com>; brottenborn@woodsrogers.com; jtreece@woodsrogers.com; Calnan, Stephanie <SCalnan@brownrudnick.com>; Presiado, Leo J. <LPresiado@brownrudnick.com>; Meyers, Jessica N. <JMeyers@brownrudnick.com>; Suda, Casey <CSuda@brownrudnick.com>; Udenka, Honieh <HUdenka@brownrudnick.com>
Subject: RE: Depp v. Heard- Conciliation on Requests for Production.

David – Andrew or Stephanie will be in touch with you to set up a meet and confer next week. I trust that you will be prepared to discuss our 9th RFPs, which we have been seeking a meet and confer on since last October without success – see attached email.

I don't think there's any need to bother [redacted] with any of this at this stage, since there hasn't yet been a call with counsel.

Have a great weekend.

brownrudnick

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Associate

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smoniz@brownrudnick.com
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From: David Murphy <DMurphy@cbcblaw.com>
Sent: Friday, January 21, 2022 6:04 AM
To: Moniz, Samuel A. <SMoniz@brownrudnick.com>; Chew, Benjamin G. <BChew@brownrudnick.com>; Vasquez, Camille M. <CVasquez@brownrudnick.com>; Crawford, Andrew C. <ACrawford@brownrudnick.com>; [redacted]
Cc: Elaine Bredehoft <ebredehoft@charlsonbredehoft.com>; Adam Nadelhaft <anadelhaft@cbcblaw.com>; Clarissa Pintado <cpintado@cbcblaw.com>; Michelle Bredehoft <mbredehoft@charlsonbredehoft.com>; brottenborn@woodsrogers.com; jtreece@woodsrogers.com

Subject: RE: Depp v. Heard- Conciliation on Requests for Production.
Importance: High

CAUTION: External E-mail. Use caution accessing links or attachments.

[redacted]

Ms. Heard again respectfully requests a Conciliation on these RFPs today. Mr. Depp continues to refuse to respond or provide any availability for a call on these matters, as he has refused to do since December 13. Ms. Heard is available at any time today, on Monday after 12 PM, or at any time on Tuesday. Please let us know if any of these dates are convenient for you.

Thank you for your consideration,

David E. Murphy
Charlson Bredehoft Cohen Brown & Nadelhaft, P.C.
11260 Roger Bacon Drive, Suite 201
Reston, Virginia 20190
PH: (703) 318-6800
FX: (703) 318-6808

From: David Murphy
Sent: Wednesday, January 19, 2022 5:19 PM
To: 'Moniz, Samuel A.' <SMoniz@brownrudnick.com>; 'Chew, Benjamin G.' <BChew@brownrudnick.com>; 'Vasquez, Camille M.' <CVasquez@brownrudnick.com>; 'Crawford, Andrew C.' <ACrawford@brownrudnick.com>; [redacted]
Cc: Elaine Bredehoft <ebredehoft@charlsonbredehoft.com>; Adam Nadelhaft <anadelhaft@cbcblaw.com>; Clarissa Pintado <cpintado@cbcblaw.com>; Michelle Bredehoft <mbredehoft@charlsonbredehoft.com>; 'brottenborn@woodsrogers.com' <brottenborn@woodsrogers.com>; 'jtreece@woodsrogers.com' <jtreece@woodsrogers.com>
Subject: RE: Depp v. Heard- Consent Order Partially Resolving 17th RFPs and Request for Conciliation
Importance: High

[redacted]

Ms. Heard respectfully requests a conciliation this week on these RFPs.

The parties have now agreed on the Order from Mr. Depp's Motion to Compel 10th-11th RFPs, and have already met and conferred and conciliated Ms. Heard's 17th RFPs that directly overlap with portions of that Order. So Ms. Heard sent the attached Consent Order to Mr. Depp on January 17 in hopes of a quick resolution, but received no response.

Mr. Depp also continues to ignore Ms. Heard's attempts to resolve her 14th-16th RFPs that we have been attempting to resolve since December 13- five weeks ago (emails attached). So Ms. Heard sent Mr. Depp a Consent Order to resolve these, but received no response.

If the parties cannot agree on these RFPs, Ms. Heard requests permission to include them in a Motion with the 3rd RFAs that are next on your list of motions priority, as these RFAs were served in October 2020- *over 15 months ago*. Mr. Depp included RFPs along with his Interrogatories in his most recent Motion, so for purposes of efficiency Ms. Heard is requesting the same.

Thank you for your consideration,

David E. Murphy
Charlson Bredehoft Cohen Brown & Nadelhaft, P.C.
11260 Roger Bacon Drive, Suite 201
Reston, Virginia 20190
PH: (703) 318-6800
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From: David Murphy
Sent: Monday, January 17, 2022 2:07 PM
To: Moniz, Samuel A. <SMoniz@brownrudnick.com>; Chew, Benjamin G. <BChew@brownrudnick.com>; Vasquez, Camille M. <CVasquez@brownrudnick.com>; Crawford, Andrew C. <ACrawford@brownrudnick.com>; [redacted]
Cc: Elaine Bredehoft <ebredehoft@charlsonbredehoft.com>; Adam Nadelhaft <anadelhaft@cbcblaw.com>; Clarissa Pintado <cpintado@cbcblaw.com>; Michelle Bredehoft <mbredehoft@charlsonbredehoft.com>; brottenborn@woodsrogers.com; jtreece@woodsrogers.com
Subject: RE: Depp v. Heard- Consent Order Partially Resolving 17th RFPs and Request for Conciliation

Sam,

During the meet and confer and conciliation process regarding Mr. Depp's 10th and 11th RFPs, we also met and conferred and conciliated regarding Ms. Heard's overlapping requests from her 17th RFPs. As you know, Ms. Heard attempted an efficient resolution to these RFPs by making the scope of relief in that Motion mutual, but Mr. Depp refused to agree and the Court then declined to hear Ms. Heard's overlapping RFPs at the time. Ms. Heard raised concerns that Mr. Depp would inevitably delay resolution of her overlapping RFPs and refuse to consent. Mr. Chew then responded to this concern by stating [redacted]

So we have taken Mr. Chew at his word, and drafted a Consent Order partially resolving the 17th RFPs, and took the RFPs the Court has already ruled upon addressing the incidents of abuse, and copied the

language from Ms. Heard's Conciliation Chart that the Court ruled on with approval at the January 7 hearing. Given that these issues have already been decided, we hope Mr. Depp will cooperate in timely reviewing this proposed Consent Order, and agree to its contents so we can submit to the Court. If there are any particular issues, please let us know right away. While these issues have already been conciliated, hopefully [redacted] can help us this week on any disagreements now that we know the Court's thinking on these issues.

Thank you for your consideration,

David E. Murphy
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FX: (703) 318-6808

From: Moniz, Samuel A. <SMoniz@brownrudnick.com>
Sent: Thursday, January 06, 2022 3:25 PM
To: David Murphy <DMurphy@cbcblaw.com>; Chew, Benjamin G. <BChew@brownrudnick.com>; Vasquez, Camille M. <CVasquez@brownrudnick.com>; Crawford, Andrew C. <ACrawford@brownrudnick.com>; [redacted]
Cc: Elaine Bredehoft <ebredehoft@charlsonbredehoft.com>; Adam Nadelhaft <anadelhaft@cbcblaw.com>; Clarissa Pintado <cpintado@cbcblaw.com>; Michelle Bredehoft <mbredehoft@charlsonbredehoft.com>; brottenborn@woodsrogers.com; jtreece@woodsrogers.com
Subject: RE: Depp v. Heard- Discovery Deficiency Email on Ms. Heard's 14th, 16th, and 17th Requests for Production of Documents

David –

Tomorrow doesn't work, but we'll get back to you with some times for a call next week.

We should also plan to discuss Mr. Depp's 9th RFPs, which substantially predate your discovery and on which we have been unsuccessfully requesting a meet and confer since last October. Please be prepared to address my email of October 29th on our call.

brownrudnick

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From: David Murphy <DMurphy@cbcblaw.com>
Sent: Tuesday, January 4, 2022 1:28 PM
To: Chew, Benjamin G. <BChew@brownrudnick.com>; Vasquez, Camille M. <CVasquez@brownrudnick.com>; Moniz, Samuel A. <SMoniz@brownrudnick.com>; Crawford, Andrew C. <ACrawford@brownrudnick.com>; [redacted]
Cc: Elaine Bredehoft <ebredehoft@charlsonbredehoft.com>; Adam Nadelhaft <anadelhaft@cbcblaw.com>; Clarissa Pintado <cpintado@cbcblaw.com>; Michelle Bredehoft <mbredehoft@charlsonbredehoft.com>; brottenborn@woodsrogers.com; jtreece@woodsrogers.com
Subject: RE: Depp v. Heard- Discovery Deficiency Email on Ms. Heard's 14th, 16th, and 17th Requests for Production of Documents

Ben, Camille, and Sam,

We have still not received a response to the below attempts to meet and confer on these RFPs, despite these going back to December 13. Please let me know your availability for a 1.5 hour meet and confer on Friday afternoon between 3-4:30 PM EST or on Monday between 11 AM- 3 PM EST to ensure we can cover everything in these emails. As Mr. Depp has been on notice of Ms. Heard's disclosure of these very specific issues and proposals for resolution since December 13 and December 23, I respectfully request that Mr. Depp be prepared to respond specifically and substantively to each proposal to ensure a productive meet and confer.

I have also added [redacted] to this email chain so we can schedule a Conciliation call on either Tuesday, January 11 or Wednesday, January 12. [redacted] please let us know if you are available on those dates, and if so good times for you so we can get this scheduled.

Thank you,

David E. Murphy

Charlson Bredehoft Cohen Brown & Nadelhaft, P.C.

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Reston, Virginia 20190

PH: (703) 318-6800

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From: David Murphy
Sent: Thursday, December 23, 2021 10:40 AM
To: Chew, Benjamin G. <BChew@brownrudnick.com>; Vasquez, Camille M. <CVasquez@brownrudnick.com>; Moniz, Samuel A. <SMoniz@brownrudnick.com>; Crawford, Andrew C. <ACrawford@brownrudnick.com>
Cc: Elaine Bredehoft <ebredehoft@charlsonbredehoft.com>; Adam Nadelhaft <anadelhaft@cbcblaw.com>; Clarissa Pintado <cpintado@cbcblaw.com>; Michelle Bredehoft <mbredehoft@charlsonbredehoft.com>; brottenborn@woodsrogers.com; jtreece@woodsrogers.com
Subject: RE: Depp v. heard- Discovery Deficiency Email on Ms. Heard's 14th and 16th Requests for Production of Documents

Ben, Camille, and Sam,

Ms. Heard has reviewed Mr. Depp's objections and responses to Ms. Heard's 17th Requests for Production of Documents, which are deficient for the reasons stated below, and for which Mr. Depp stood on all of his objections and refused to produce any documents.

As you know, we have been trying to schedule a meet and confer with you for the past several weeks, to not only discuss your email respecting Mr. Depp's 10th and 11th RFPs, but our 14th, 15th, and 16th RFPs. In spite of several requests for dates and times, you did not respond to us at all. We now add this additional 17th Set of RFPs to that list, and ask that you provide us with dates and times in this next week, as Mr. Chew represented that you would do, so we can have meaningful discussions and genuinely try to resolve some of the disputes.

1. **Mr. Depp's Overall Refusal to Produce Documents Supporting Factual Statements in Declarations and Witness Statements:** Mr. Depp refused to produce *any* responsive documents

supporting *any* of the specifically referenced and quoted factual statements from the parties' respective Declarations and UK Witness Statements as specifically referenced below. Yet Mr. Depp filed a Motion to Compel yesterday seeking to compel RFPs 1, 2, 5, 7, 10, 13, 14, 18, 22, 24, 26, 32, and 35 of his 11th RFPs that seek documents "that relate to" specific sections of Ms. Heard's UK Witness Statement. Mr. Depp's RFPs are far broader than the RFPs described below, as they include "relating to" as opposed to "supporting," are not limited to specifically quoted factual statements, and incorporate numerous paragraphs of the UK Witness Statement within a single RFP.

Mr. Depp moving to compel these RFPs is particularly astounding, because Mr. Depp has repeatedly argued to the Court that Ms. Heard's RFPs seeking documents supporting one Defense, one Interrogatory response, or one paragraph of the Counterclaim are overbroad, unduly burdensome, and lack particularity- leading to the inescapable conclusion that even Mr. Depp must agree his own RFPs he moved to compel are overbroad, unduly burdensome, and lack particularity. These overlapping issues are why Ms. Heard seeks to meet and confer on both parties' RFPs during one meet and confer, followed by Conciliation.

2. **Revising Predicate Language of RFPs:** Ms. Heard will agree to strike the word "all" from all RFPs, along with revising the language "supporting, refuting, or otherwise relating to" to "supporting." We also expect Mr. Depp to do the same for his 10th-11th RFPs based on his own arguments and the Court's rulings on Ms. Heard's 11th-12th RFPs. If Mr. Depp will not agree, please explain how this is a tenable position based on Mr. Depp's prior arguments and the Court's recent rulings.

3. **RFPs 1-2:** RFP 1 seeks communications between Mr. Depp and Warner Bros. related to the letter posted to Mr. Depp's own Instagram account stating that Mr. Depp was "asked to resign by Warner Bros from my role as Grindelwald in Fantastic Beasts and I have respected and agreed to that request." RFP 2 then seeks communications between Mr. Depp and anyone related to this same request from Warner Bros. The relevance of these documents cannot be more obvious, including causation as Mr. Depp being fired from his role as Grindelwald immediately following the UK Court Judgment, and the RFP is specifically and narrowly tailored to the Grindelwald role, yet Mr. Depp asserted extensive boilerplate objections and refused to produce any documents. These objections are meritless, should be withdrawn, and all responsive documents produced immediately.

4. **RFPs 3-12, 14, 16, 18, 20, 22-25, 27-35, 37-38, 40-43:** RFP 3 seeks documents supporting Mr. Depp's Declaration. The remaining RFPs in this group then seek documents supporting the specific factual statements in the referenced paragraphs of Mr. Depp's Declaration. Mr. Depp has repeatedly taken the position that seeking documents supporting all statements in a document is overbroad and unduly burdensome, so Ms. Heard was forced to serve a different RFP for each specific paragraph of this document, along with all of the other Declarations and Witness Statements included in this 17th Set of RFPs as referenced below. But Mr. Depp still asserted his typical boilerplate objections to all of these Requests, which cannot be more specific or narrowly

tailored, and refused to produce any documents. Mr. Depp's objections are meritless, should be withdrawn, and all responsive documents produced immediately.

5. **RFPs 13, 15, 17, 19, 21, 26, 36, 39:** These RFPs seek production of Mr. Depp's Devices for forensic imaging and extraction of the multimedia referenced in and attached to Mr. Depp's Declaration as referenced in each RFP. If the Court grants Ms. Heard's Motion to Compel forensic discovery against Mr. Depp, we would hope Mr. Depp withdraws all of these objections as they will have been effectively overruled by the Court.

6. **RFPs 44-62:** RFP 44 seeks documents supporting Mr. Depp's Second Witness Statement in the UK litigation. The remaining RFPs in this group then seek documents supporting the specific factual statements in the referenced paragraphs of Mr. Depp's Second Witness Statement. Mr. Depp asserted his typical boilerplate objections to all of these Requests, which cannot be more specific or narrowly tailored, and refused to produce any documents. Mr. Depp's objections are meritless, should be withdrawn, and all responsive documents produced immediately.

7. **RFPs 63-73:** RFP 63 seeks documents supporting Mr. Depp's Third Witness Statement in the UK litigation. The remaining RFPs in this group then seek documents supporting the specific factual statements in the referenced paragraphs of Mr. Depp's Third Witness Statement. Mr. Depp asserted his typical boilerplate objections to all of these Requests, which cannot be more specific or narrowly tailored, and refused to produce any documents. Mr. Depp's objections are meritless, should be withdrawn, and all responsive documents produced immediately.

8. **RFPs 74-77:** RFP 74 seeks documents supporting Mr. Depp's Fifth Witness Statement in the UK litigation. The remaining RFPs in this group then seek documents supporting the specific factual statements in the referenced paragraphs of Mr. Depp's Fifth Witness Statement. Mr. Depp asserted his typical boilerplate objections to all of these Requests, which cannot be more specific or narrowly tailored, and refused to produce any documents. Mr. Depp's objections are meritless, should be withdrawn, and all responsive documents produced immediately.

9. **RFPs 78-91:** RFP 78 seeks documents supporting Ms. Heard's Declaration. The remaining RFPs in this group then seek documents supporting the specific factual statements in the referenced paragraphs of Ms. Heard's Declaration. Mr. Depp asserted his typical boilerplate objections to all of these Requests, which cannot be more specific or narrowly tailored, and refused to produce any documents. Mr. Depp's objections are meritless, should be withdrawn, and all responsive documents produced immediately.

10. **RFPs 92-120:** RFP 92 seeks documents supporting Ms. Heard's Witness Statement in the UK litigation. The remaining RFPs in this group then seek documents supporting the specific factual

statements in the referenced paragraphs of Heard's Witness Statement. Mr. Depp asserted his typical boilerplate objections to all of these Requests, which cannot be more specific or narrowly tailored, and refused to produce any documents. Mr. Depp's objections are meritless, should be withdrawn, and all responsive documents produced immediately.

11. **RFPs 121-132:** RFP 121 seeks documents supporting Heard's Third Witness Statement in the UK litigation. The remaining RFPs in this group then seek documents supporting the specific factual statements in the referenced paragraphs of Heard's Third Witness Statement. Mr. Depp asserted his typical boilerplate objections to all of these Requests, which cannot be more specific or narrowly tailored, and refused to produce any documents. Mr. Depp's objections are meritless, should be withdrawn, and all responsive documents produced immediately.

12. **RFPs 133-158:** RFP 133 seeks documents supporting Heard's Fifth Witness Statement in the UK litigation. The remaining RFPs in this group then seek documents supporting the specific factual statements in the referenced paragraphs of Heard's Fifth Witness Statement. Mr. Depp asserted his typical boilerplate objections to all of these Requests, which cannot be more specific or narrowly tailored, and refused to produce any documents. Mr. Depp's objections are meritless, should be withdrawn, and all responsive documents produced immediately.

13. **RFP 159:** This RFP seeks the documents relied upon or considered by any expert witness in Mr. Depp's Expert Designation. Mr. Depp also served similar RFPs, and Ms. Heard objected and responded by proposing the parties agree on a mutual procedure for production of documents relied on by their respective expert witnesses due to the limitations imposed by Virginia's Rules on expert discovery. Ms. Heard remains willing to engage in this mutual process, despite Mr. Depp prematurely moving to compel them without a meet and confer, conciliation, or even addressing Ms. Heard's proposal, which should then resolve this RFP and RFPs 160-217 below.

14. **RFPs 160-207:** These RFPs seek the documents supporting specific statements in Mr. Depp's disclosure of his expert witnesses:

    1. RFPs 160-173: These RFPs seek documents supporting the specifically referenced and quoted statements from Mr. Depp's disclosure of Mr. Marks as an expert witness.

    2. RFPs 174-179: These RFPs seek documents supporting the specifically referenced and quoted statements from Mr. Depp's disclosure of Mr. Spindler as an expert witness.

3. RFPs 180-184: These RFPs seek documents supporting the specifically referenced and quoted statements from Mr. Depp's disclosure of Mr. Bania as an expert witness.

4. RFPs 185-192: These RFPs seek documents supporting the specifically referenced and quoted statements from Mr. Depp's disclosure of Mr. Neumeister as an expert witness.

5. RFPs 193-197: These RFPs seek documents supporting the specifically referenced and quoted statements from Mr. Depp's disclosure of Dr. Curry as an expert witness.

6. RFPs 198-203: These RFPs seek documents supporting the specifically referenced and quoted statements from Mr. Depp's disclosure of Dr. Collins as an expert witness.

7. RFPs 204-207: These RFPs seek documents supporting the specifically referenced and quoted statements from Mr. Depp's disclosure of Ms. Frost as an expert witness.

Mr. Depp asserted his typical boilerplate objections and refused to produce any documents for any of these RFPs. Mr. Depp also served similar RFPs, and Ms. Heard objected and responded by proposing mutual procedure described above. Ms. Heard remains willing to engage in this mutual process, despite Mr. Depp prematurely moving to compel them without a meet and confer, conciliation, or even addressing Ms. Heard's proposal.

15. **RFPs 208-217:** These RFPs seek the documents supporting the specifically quoted statements in Mr. Depp's disclosure of Mr. Carino (RFPs 208-209), Mr. Whigham (RFPs 210-211), Mr. White (RFPs 212-213), Ms. Baum (214-215), and Dr. Kipper (RFPs 216-217) as non-retained experts who will testify at trial. Mr. Depp asserted his usual boilerplate objections and, which are meritless and should be withdrawn, and refused to produce any documents. All responsive documents should be produced immediately.

Please provide us with dates and times in this next week, as Mr. Chew represented that you would do, so we can have meaningful discussions and genuinely try to resolve some of the disputes. If those efforts are unsuccessful we will then schedule a call with the Conciliator before proceeding to Motions practice, which we hope will not be necessary.

Thank you for your consideration,

David E. Murphy

Charlson Bredehoft Cohen & Brown, P.C.

11260 Roger Bacon Drive, Suite 201

Reston, Virginia 20190

PH: (703) 318-6800

FX: (703) 318-6808

From: David Murphy
Sent: Monday, December 20, 2021 5:37 PM
To: Chew, Benjamin G. <BChew@brownrudnick.com>; Vasquez, Camille M. <CVasquez@brownrudnick.com>; Moniz, Samuel A. <SMoniz@brownrudnick.com>; Crawford, Andrew C. <ACrawford@brownrudnick.com>
Cc: Elaine Bredehoft <ebredehoft@charlsonbredehoft.com>; Adam Nadelhaft <anadelhaft@cbcblaw.com>; Clarissa Pintado <cpintado@cbcblaw.com>; Michelle Bredehoft <mbredehoft@charlsonbredehoft.com>; brottenborn@woodsrogers.com; jtreece@woodsrogers.com
Subject: RE: Depp v. heard- Discovery Deficiency Email on Ms. Heard's 14th and 16th Requests for Production of Documents

Ben, Camille, and Sam,

I am following up on my email below. Please let me know when you are available for a meet and confer on these RFPs. We are available on Thursday between 1-3 PM.

David E. Murphy

Charlson Bredehoft Cohen & Brown, P.C.

11260 Roger Bacon Drive, Suite 201

Reston, Virginia 20190

PH: (703) 318-6800

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From: David Murphy
Sent: Monday, December 13, 2021 6:58 PM
To: Chew, Benjamin G. <BChew@brownrudnick.com>; Vasquez, Camille M. <CVasquez@brownrudnick.com>; Moniz, Samuel A. <SMoniz@brownrudnick.com>; Crawford, Andrew C. <ACrawford@brownrudnick.com>
Cc: Elaine Bredehoft <ebredehoft@charlsonbredehoft.com>; Adam Nadelhaft <anadelhaft@cbcblaw.com>; Clarissa Pintado <cpintado@cbcblaw.com>; Michelle Bredehoft <mbredehoft@charlsonbredehoft.com>; brottenborn@woodsrogers.com; jtreece@woodsrogers.com
Subject: Depp v. heard- Discovery Deficiency Email on Ms. Heard's 14th and 16th Requests for Production of Documents

Ben, Camille, and Sam,

Ms. Heard has reviewed Mr. Depp's objections and responses to RFPs 1-3 and 13-14 of Ms. Heard's 14th Requests for Production of Documents and Ms. Heard's 16th Requests for Production of Documents, which are deficient for the reasons stated below.

14th Requests for Production of Documents

1. **RFPs 1-3:** These three RFPs seek documents related to Mr. Depp's statements to Mr. Carino in the audio recording produced as DEPP8296. The specific statements for these RFPs are that: 1) "have gotten emails from every fucking studio fucking head from every motherfucker, I didn't do a thing. 'I'm sorry you're going through this. I'm so sorry.' Clearly she's out of her fucking mind. She is viewed as out of her fucking mind across the globe"; 2) "There ain't no motherfucker in this

business going to hire her"; 3) "Oh, she's ruined. For sure. She did that herself. In terms of the business, she's a wrap."

Mr. Depp asserted and stood on extensive objections to RFPs 1-3, and refused to produce any documents. But these RFPs cannot possibly be any more specific. Mr. Depp also objected on relevance and harassment, despite these RFPs going to factual issues at the heart of the case – RFP 1 clearly going to causation of Mr. Depp's alleged damages, and RFPs 2-3 going to causation of Ms. Heard's damages.

As a compromise, Ms. Heard will agree to revise the predicate language of these Requests to the following: "Please produce documents supporting Mr. Depp's statement to Christian Carino in the audio recording produced as DEPP8296 that _____." Surely Mr. Depp cannot object to producing documents supporting his own statements on this relevant subject matter, including his own claim to receiving "emails" commenting on Ms. Heard's allegations. The remaining objections should be withdrawn, and all documents responsive to this revised Request produced immediately.

2. **RFP 13:** This RFP seeks communications between Mr. Depp (or any agents and employees) and any journalist, newspaper, or publication (including but not limited to The Daily Mail) referring, reflecting, or related to any audio or video recordings (or partial recordings) of Mr. Depp or Ms. Heard from 2008 to the present. Mr. Depp asserted and stood on extensive objections, and refused to produce any documents.

Mr. Depp's team leaking recordings to the press of recordings of him or Ms. Heard relate to both Mr. Depp's and Ms. Heard's claims, as their reputations are at issue. Mr. Depp also objected that these RFPs lack particularity, are overbroad and unduly burdensome, and are vague/ambiguous, but this RFP only seeks communications with publications regarding recordings of Mr. Heard or Mr. Depp from 2008 to the present. If as Mr. Depp has previously contended he did not leak any recordings to any journalist, newspaper, or publication, then there should be no responsive documents for Mr. Depp to produce. If Mr. Depp did so, the documents are relevant.

As a compromise, Ms. Heard will agree to revise this Requests to the following: "Please produce communications between Mr. Depp (or any of Mr. Depp's agents or employees on his behalf) and any journalist, newspaper, publication (including but not] limited to The Daily Mail) referring to or reflecting any audio or video recordings (or partial recordings) of Mr. Depp or Ms. Heard. The remaining objections should be withdrawn, and all documents responsive to this revised Request produced immediately.

3. **RFP 14:** This RFP seeks documents and communications relating to the purported investigation of Ms. Heard in Australia, including communications between Mr. Depp (or any agents and employees) and any journalist, newspaper, or publication on this subject matter. Mr. Depp asserted and stood on extensive objections, and refused to produce any documents.

The issue of Ms. Heard and Mr. Depp's dogs in Australia has arisen multiple times in this litigation, with the parties each blaming each other for the issue. So these documents and communications are relevant and are bound by particular subject matter, and Mr. Depp's objections on that basis are misplaced.

As a compromise, Ms. Heard will agree to revise this Requests to the following: "Please produce documents and communications referring to or reflecting any purported investigation of Ms. Heard in Australia, including but not limited to all communications sent or received between Mr. Depp (or any of Mr. Depp's agents or employees on his behalf) and any journalist, newspaper, or publication."

The remaining objections should be withdrawn, and all documents responsive to this revised Request produced immediately.

16th Requests for Production of Documents

1. **Objections to Definition of "Mr. Depp's Devices":** Mr. Depp objected to this definition on relevance and that it seeks documents not in Mr. Depp's possession, custody and control. But the bases for this definition are the exact devices and data that *Mr. Depp* confirmed in an Interrogatory response under oath were in his possession, custody, and control and contained ESI relevant to the claims and defenses in this case. Therefore, please explain how Mr. Depp can object on these basis.

2. **Objections to "Depp Alleged Abuse by Heard Dates":** Mr. Depp objected to this definition on grounds of overly broad, unduly burdensome, harassing, and relevance, but these date ranges are based on Mr. Depp's own allegations of abuse by Ms. Heard from his own Declaration submitted in this case and Witness Statements submitted in the UK litigation. Therefore, please identify your specific bases for any contention these date ranges are irrelevant, overly broad, or unduly burdensome.

3. **Confidential/Proprietary Objections:** Mr. Depp objected to all Requests on grounds of calling for confidential, proprietary, and private personal/business information, but we see no basis these documents would be covered by the protective order, and even if they were covered that would not be a basis to refuse production. At minimum, this objection cannot be used to withhold production, but only to designated documents as Confidential if they are within the scope of the protective order.

4. **RFP 1:** This RFPs seek documents and communications containing the word "monster" from January 1, 2012 to the present. Mr. Depp's and Ms. Heard's use of the word "monster" and what this word references is a very relevant issue in this case, with Mr. Depp contending his use of this word does not relate to his abuse of Ms. Heard. Mr. Depp then refused to produce any responsive documents. As a compromise, Ms. Heard is willing to revise this RFP to the following: "Please produce documents and communications referring to Mr. Depp as a 'monster' from January 1, 2012 to the present." These objections should now be withdrawn, and all responsive documents to this revised Request produced immediately.

5. **RFPs 2-7:** These RFPs seek documents and communications related to the specific statements within Mr. Depp's 4th and 5th Defenses to the counterclaim. As you know, Mr. Depp has repeatedly taken the position that Ms. Heard's prior document Requests referencing Mr. Depp's defenses to the Counterclaim lack specificity, so Ms. Heard served this Request directly quoting the factual statements from these Defenses.

   As a compromise, Ms. Heard will agree to revise the predicate language of these Requests to the following: "Please produce documents and communications supporting or refuting the following statements" from either Mr. Depp's 4th or 5th Defenses to the Counterclaim: _____." All other objections should be withdrawn and all non-privileged, responsive documents produced immediately.

6. **RFPs 8-27:** RFPs 8-16 seek documents related to Mr. Depp's specific repeated factual statements regarding whether "that particular conduct by Mr. Waldman was authorized by Counterclaim Defendant or done at his direction" from ¶¶ 41-42 and 44-52 of Mr. Depp's Answer to the Counterclaim. Mr. Depp stood on his objections, and refused to produce any responsive documents.

   RFPs 17-27 then seek documents related to Mr. Depp's similar repeated factual statement regarding whether "that particular conduct by Mr. Waldman was performed as an agent or was authorized by Counterclaim Defendant or done at his direction" from ¶¶ 66-70 of Mr. Depp's

Answer to the Counterclaim. Mr. Depp stood on his objections, and refused to produce any responsive documents.

As a compromise, Ms. Heard will agree to revise the predicate language of these Requests to the following: "Please produce documents and communications supporting the following statement in ¶ __ of your Answer to the Counterclaim: ___." All other objections should be withdrawn and all non-privileged, responsive documents produced immediately.

7. **RFPs 28-31:** RFPs 28-31 seek all photographs, video recordings, and audio recordings (and deleted) of Mr. Depp's fingers, finger injury, severed finger, or hands on Mr. Depp's Devices during the time period of March 1-19, 2015 in native form with all metadata, along with production of Mr. Depp's Devices for purposes of extraction of these same photographs, video recordings, and audio recordings (and deleted) during the same time period.

   Mr. Depp asserted extensive objections, and only agreed to produce photographs and video recordings of Mr. Depp's finger injury or severed finger during this time period, but refused to produce photographs and video recordings of Mr. Depp's finger or hands during this same time period. Mr. Depp also claims he is unaware of any "deleted" photographs or video recordings, but did not state if he has searched Mr. Depp's Devices, cloud accounts, or backups for any deleted photographs or video recordings.

   For RFP 30 seeking audio recordings, Mr. Depp stood on his objections and refused to produce any audio recordings, claiming the Request was "unintelligible." But this objection does not make sense, as audio recordings related to Mr. Depp's conduct in The Australia House have already been produced. Please explain the basis for this objection and refusal to produce.

   These RFPs and Mr. Depp's objections also raise the same issues the parties are currently meeting and conferring on regarding Ms. Heard's 14th and 15th Requests, so we will include them in those meet and confers.

8. **RFPs 33-36:** These RFPs seek all photographs, video recordings, and audio recordings (and deleted) of Mr. Depp on Mr. Depp's Devices during the time period of February 17-March 19, 2015 in native form with all metadata, along with production of Mr. Depp's Devices for purposes of extraction of these same photographs, video recordings, and audio recordings (and deleted) during the same time period. Mr. Depp asserted extensive objections, and refused to produce any responsive multimedia. These RFPs and Mr. Depp's objections raise the same issues the parties are currently meeting and conferring on regarding Ms. Heard's 14th and 15th Requests, so we will include them in those meet and confers.

9. **RFP 32:** This RFP seek communications on Mr. Depp's Devices between February 17-March 19, 2015 relating to Mr. Dep's fingers, finger injury, severed finger, or hands. Mr. Depp's finger and its causation is a hotly disputed issue in this litigation, and all communications related to this injury are indisputably relevant.

   Mr. Depp asserted extensive objections, and only agreed to produce documents and communications relating to his finger injury. But the RFP also seeks communications related to Mr. Depp's fingers, severed finger, or hands during this time period, because they would reveal relevant evidence about these specific body parts during a relevant time period, even if not directly related to Mr. Depp's finger injury. The objections should be withdrawn and all responsive documents produced immediately.

10. **RFPs 37, 44, 46:** These RFPs seek documents related to prior settlements of claims involving Mr. Depp. RFP 37 seeks payments made by Mr. Depp, Mr. Depp's entities, or his agents to anyone asserting claims against Mr. Depp. Mr. Depp asserted extensive objections and refused to produce any documents, but Ms. Heard is willing to narrow this RFP to only seeking documents "sufficient to reflect any payments" to anyone asserting claims against Mr. Depp.

    RFP 46 then seeks documents reflecting the settlement terms in any litigation involving Mr. Depp, but Mr. Depp asserted extensive objections and refused to produce any documents. Ms. Heard is similarly willing to narrow this RFP to only seek documents "sufficient to reflect the settlement terms in any litigation involving Mr. Depp," which could be accomplished by producing the settlement agreements from any of these litigations.

    RFP 44 then seeks documents related to any legal matter, demands, claims, or allegations made against or involving Mr. Depp from 2009 to the present. Ms. Heard will revise this Request to state "Documents referring to any legal matter, demands, claims, or allegations made against, about, or involving Mr. Depp respecting or by any person or entity from January 1, 2009 to the present."

    Documents responsive to these revised RFPs should be produced.

11. **RFP 38:** This RFP seek documents related to any video and audio recordings, photographs, or images of Ms. Heard, including anything recorded by Mr. Depp or any of his entities, representatives, or agents. Mr. Depp asserted extensive objections and refused to produce any documents. As a compromise, Ms. Heard is willing to revise this RFP to the following: "Any video

recordings, audio recordings, photographs, or images of Ms. Heard, including copies of anything recorded by Mr. Depp or any of his entities, representatives, or agents from January 1, 2012 to the present." The objections should now be withdrawn, and all responsive documents produced immediately.

12. **RFP 39:** This RFP seek documents relating to any consumption or possible consumption of alcohol or drug use, or abuse, by Mr. Depp. Mr. Depp's use and abuse of alcohol and drugs is clearly relevant to this case, especially during the specific time periods the parties accuse each other of abuse and property damage. But Mr. Depp asserted extensive objections and refused to produce any documents.

As a compromise, Ms. Heard is willing to revise this RFP to seeking "documents that refer to any consumption or possible consumption of alcohol or drug use, or abuse, by Mr. Depp during any of the Depp Abuse of Heard Dates, the Depp Alleged Abuse by Heard Dates, or the "Property Damage Dates" (defined as: February 26-March 18, 2013; July 1-5, 2013; May 22-26, 2014; August 1-31, 2014; March 1-31, 2015; December 10-31, 2015; April 15-27, 2016; and May 15-27, 2016). Responsive documents to this revised RFP should be produced immediately.

13. **RFP 40:** This RFP seek documents relating to Mr. Depp's issues with anger, verbal abuse or similar conduct by Mr. Depp- subject matter clearly relevant to the issues at the heart of this case. Mr. Depp asserted extensive objections and refused to produce any documents. As a compromise, Ms. Heard is willing to revise this Request to the following: "Documents referring to any instances of anger, anger management, shouting, yelling, scolding or speaking in a harsh tone, by Mr. Depp toward any person, including Ms. Heard or other females, any acquaintances, friends, dates, employees, or contractors of Mr. Depp or his companies, photographers, videographers, news reporters, and/or strangers." The objections should now be withdrawn, and all responsive documents produced immediately.

14. **RFP 41:** This RFP seek documents relating to Mr. Depp's efforts to cover up, deny, falsify, or misrepresent facts or events reflecting negatively upon him. Mr. Depp asserted extensive objections and refused to produce any documents. A myriad of testimony and evidence produced in this case has revealed Mr. Depp's and his agents significant efforts to cover up and falsify facts or events reflecting negatively upon Mr. Depp, so documents containing some of this subject matter have already been produced and/or testified to. These efforts overlap with Mr. Depp's substantial efforts to cover up and conceal his abuse of Ms. Heard, and reveal a pattern of Mr. Depp's agents protecting him from the consequences of his own actions and behavior.

As a compromise, Ms. Heard is willing to revise this Request to the following: "Documents supporting Mr. Depp's efforts to cover up, deny, falsify, or misrepresent facts or events reflecting negatively upon him." The objections should now be withdrawn, and all responsive documents produced immediately.

15. **RFP 42:** This RFP seek documents relating to instances of physical violence by Mr. Depp towards any person or property, including multimedia. Mr. Depp asserted extensive objections and refused to produce any documents. As a compromise, Ms. Heard is willing to revise this Request to the following: "Documents referring to or reflecting any instances of physical violence by Mr. Depp towards any person or property, including any photographs, videos, drawings, or descriptions of any such physical violence." The objections should now be withdrawn, and all responsive documents produced immediately.

16. **RFP 43:** This RFP seek documents relating to complaints or criticisms against Mr. Depp from 2009 to the present. Mr. Depp asserted extensive objections and refused to produce any documents. As a compromise, Ms. Heard is willing to revise this Request to the following: "Documents referring to any complaints and/or criticisms of Mr. Depp for any conduct involving violence, abuse, damage to property, alcohol or drug use or abuse, intoxication on drugs or alcohol, lateness, or tardiness." The objections should now be withdrawn, and all responsive documents produced immediately.

17. **RFP 45:** This RFP seek documents that negatively impact Mr. Depp's reputation. Mr. Depp asserted extensive objections and refused to produce any documents. But Mr. Depp successfully moved to compel RFPs 5-9 of his 4th Set of Requests for Production, all of which sought documents reflecting Ms. Heard's reputation. So this RFP only seeking documents that reflect *negatively* on Mr. Depp's reputation is narrower and more specific than the RFPs Mr. Depp moved to compel. These objections should be withdrawn, and all responsive documents produced.

Please let us know your availability to meet and confer on these RFPs within the next week, and if those efforts are unsuccessful we will then schedule a call with the Conciliator before proceeding to Motions practice, which we hope will not be necessary.

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 PARTIALLY RESOLVING PORTIONS OF MS. HEARD'S 17th REQUESTS FOR PRODUCTION OF DOCUMENTS

Defendant and Counterclaim Plaintiff Amber Laura Heard ("Ms. Heard") and Plaintiff and Counterclaim Defendant John C. Depp, II ("Ms. Depp"), by counsel, having engaged in meet and confers respecting portions of Ms. Heard's 17th Requests for Production of Documents to Mr. Depp, and having consented to an Order respecting certain of these discovery requests, as evidenced by their signatures below, it is hereby:

ORDERED that as to the following Requests of Ms. Heard's 17th Set of Requests for Production of Documents, Mr. Depp shall produce the following non-privileged documents within his possession, custody, and control:

> With respect to Requests 48-59, Mr. Depp shall produce any responsive, non-privileged documents referring to or reflecting the incidents described in the paragraphs of Mr. Depp's 2nd Witness Statement described in those Requests;
>
> With respect to Requests 65-72, Mr. Depp shall produce any responsive, non-privileged documents referring to or reflecting the incidents described in the paragraphs of Mr. Depp's 3rd Witness Statement described in those Requests;
>
> With respect to Requests 79-91, Mr. Depp shall produce any responsive, non-privileged documents referring to or reflecting the incidents described in the paragraphs of the Declaration of Ms. Heard described in those Requests;

With respect to Requests 106-119, Mr. Depp shall produce any responsive, non-privileged documents referring to or reflecting the incidents described in the paragraphs of Ms. Heard's Witness Statement described in those Requests;

; and it is further

ORDERED that 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

David Murphy

From: David Murphy
Sent: Tuesday, January 18, 2022 11:05 AM
To: Moniz, Samuel A.; Chew, Benjamin G.; Vasquez, Camille M.; Crawford, Andrew C.; [redacted]
Cc: Elaine Bredehoft; Adam Nadelhaft; Clarissa Pintado; Michelle Bredehoft; brottenborn@woodsrogers.com; jtreece@woodsrogers.com
Subject: RE: Depp v. Heard- Consent Order Partially Resolving 14th and 16th RFPs and Request for Conciliation
Attachments: Consent Order- Partially Resolving Heard's 14th and 16th RFPs.docx

Sam,

Despite multiple representations of providing dates for a meet and confer on RFPs that Ms. Heard has been seeking since December 13, we still have not received a specific response. Therefore, Ms. Heard prepared the attached proposed consent order regarding the portions of the 14th and 16th RFPs not included in Ms. Heard's pending Motion, so the parties can more efficiently attempt to resolve them. Based on Mr. Depp's repeated refusal to meet and confer since December 13, we are now requesting a conciliation call with [redacted] on these specific RFPs and Consent Order this week.

Thank you for your anticipated cooperation,

David E. Murphy
Charlson Bredehoft Cohen Brown & Nadelhaft, P.C.
11260 Roger Bacon Drive, Suite 201
Reston, Virginia 20190
PH: (703) 318-6800
FX: (703) 318-6808

From: Moniz, Samuel A. <SMoniz@brownrudnick.com>
Sent: Thursday, January 06, 2022 3:25 PM
To: David Murphy <DMurphy@cbcblaw.com>; Chew, Benjamin G. <BChew@brownrudnick.com>; Vasquez, Camille M. <CVasquez@brownrudnick.com>; Crawford, Andrew C. <ACrawford@brownrudnick.com>; [redacted]
Cc: Elaine Bredehoft <ebredehoft@charlsonbredehoft.com>; Adam Nadelhaft <anadelhaft@cbcblaw.com>; Clarissa Pintado <cpintado@cbcblaw.com>; Michelle Bredehoft <mbredehoft@charlsonbredehoft.com>; brottenborn@woodsrogers.com; jtreece@woodsrogers.com
Subject: RE: Depp v. Heard- Discovery Deficiency Email on Ms. Heard's 14th, 16th, and 17th Requests for Production of Documents

David –

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 PARTIALLY RESOLVING PORTIONS OF MS. HEARD'S 14th AND 16th REQUESTS FOR PRODUCTION OF DOCUMENTS

Defendant and Counterclaim Plaintiff Amber Laura Heard ("Ms. Heard") and Plaintiff and Counterclaim Defendant John C. Depp, II ("Ms. Depp"), by counsel, having engaged in meet and confers respecting portions of Ms. Heard's Fourteenth and Sixteenth Requests for Production of Documents[1] to Mr. Depp, and having consented to an Order respecting certain of these discovery requests, as evidenced by their signatures below, it is hereby:

ORDERED that as to the following Requests of Ms. Heard's 14th Set of Requests for Production of Documents, Mr. Depp shall produce any non-privileged documents within his possession, custody, and control responsive to the following revised Requests:

> Revised Request 1: Please produce any documents supporting Mr. Depp's statement to Christian Carino in the audio recording produced as DEPP8296 that " [I] have gotten emails from every fucking studio fucking head from every motherfucker, I didn't do a thing. 'I'm sorry you're going through this. I'm so sorry.' Clearly she's out of her fucking mind. She is viewed as out of her fucking mind across the globe."
>
> Revised Request 2: Please produce any documents supporting Mr. Depp's statement to Christian Carino in the audio recording produced as DEPP8296 that "There ain't no motherfucker in this business going to hire her."

[1] The portions of Ms. Heard's 14th and 16th Requests for Production of Documents not included in this Consent Order are part of Ms. Heard's pending Motion to Compel set for argument on January 26, 2022.

Revised Request 3: Please produce any documents supporting Mr. Depp's statement to Christian Carino in the audio recording produced as DEPP8296 that "Oh, she's ruined. For sure. She did that herself. In terms of the business, she's a wrap."

Revised Request 13: Please produce any communications between Mr. Depp (or any of Mr. Depp's agents or employees on his behalf) and any journalist, newspaper, publication (including but not limited to The Daily Mail) referring to or reflecting any audio or video recordings (or partial recordings) of Mr. Depp or Ms. Heard.

Revised Request 14: Please produce any documents and communications referring to or reflecting any purported investigation of Ms. Heard in Australia, including but not limited to any communications sent or received between Mr. Depp (or any of Mr. Depp's agents or employees on his behalf) and any journalist, newspaper, or publication.

; and it is further

ORDERED that as to the following Requests of Ms. Heard's 16th Set of Requests for Production of Documents, Mr. Depp shall produce any non-privileged documents within his possession, custody, and control responsive to the following revised Requests:

Revised Request 1: Please produce any communications "monster" from January 1, 2012 to the present.

Revised Request 2: Please produce any documents and communications supporting the following statement from Mr. Depp's 4th Defense to the Counterclaim: "The statements forming the basis of the counterclaim are not false and defamatory because they were truthful."

Revised Requests 3-7: Please produce any documents and communications supporting the following statements from Mr. Depp's 5th Defense to the Counterclaim:

(a)"whether or not there was authorization from Counterclaim Defendant to, or a conspiracy with, Mr. Waldman to make the statements forming the basis of the Counterclaim";
(b) "Counterclaim Defendant's lack of direction as to the subject statements";
(c) "Counterclaim Defendant's lack of direction or control of a third party as to the subject statements";
(d) "a third party exceed[ed] the scope of employment or agency relationship as to the subject statements"; and
(e) The "statements [were] made by an independent contractor."

Combined Revised Requests 8-16: Please produce any documents and communications supporting the following statement in ¶¶ 41, 42, 44-49, and 52 of your Answer to the Counterclaim- whether "that particular conduct by Mr. Waldman was authorized by Counterclaim Defendant or done at his direction."

Combined Revised Requests 17-27: Please produce any documents and communications supporting the following statement in ¶¶ 66, 66(a-f), and 67-70 of your Answer to the Counterclaim- whether "that particular conduct by Mr. Waldman was performed as an agent or was authorized by Counterclaim Defendant or done at his direction."

Revised Request 32: Please produce any communications on Mr. Depp's Devices between February 17-March 19, 2015 referring to or reflecting Mr. Depp's fingers, finger injury, severed finger, or hands.

Revised Request 37: Documents sufficient to reflect any payments made by Mr. Depp, any of Mr. Depp's entities, or agents, to anyone asserting claims against Mr. Depp for any claims relating to the subject matter contained in Revised RFP 5 regarding "Other Litigations" of the Court's August 19, 2021 Order.

Revised Request 44: Documents referring to any legal matter, demands, claims or allegations made against, about or involving Mr. Depp respecting or by any person or entity from January 1, 2009 until the present relating to the subject matter contained in Revised RFP 5 regarding "Other Litigations" of the Court's August 19, 2021 Order.

Revised Request 46: Documents sufficient to reflect the settlement terms in any litigation involving Mr. Depp relating to the subject matter contained in Revised RFP 5 regarding "Other Litigations" of the Court's August 19, 2021 Order.

Revised Request 38: Any video recordings, audio recordings, photographs, or images of Ms. Heard, including any copies of anything recorded by Mr. Depp or any of his entities, representatives or agents, from January 1, 2012 to the present.

Revised Request 39: Any documents that refer to or reflect any consumption or possible consumption of alcohol or drug use, or abuse, by Mr. Depp during any of the Depp Abuse of Heard Dates, the Depp Alleged Abuse by Heard Dates, or the Property Damage Dates.[2]

Revised Request 40: Any documents referring to or reflecting any instances of anger, anger management, shouting, yelling, scolding or speaking in a harsh tone, by Mr. Depp toward any person, including Ms. Heard or other females, any acquaintances, friends,

[2] For purposes of this Request, the phrases Depp Abuse of Heard Dates and the Depp Alleged Abuse by Heard Dates" are defined in the 16th Requests for Production of Documents. "Property Damage Dates" is defined as: "February 26-March 18, 2013; July 1-5, 2013; May 22-26, 2014; August 1-31, 2014; March 1-31, 2015; December 10-31, 2015; April 15-27, 2016; and May 15-27, 2016."

dates, employees, or contractors of Mr. Depp or his companies, photographers, videographers, news reporters, and/or strangers.

Revised Request 41: Documents referring to or reflecting any efforts by Mr. Depp to cover up, deny, falsify, or misrepresent facts or events reflecting negatively upon him.

Revised Request 42: Any documents referring to or reflecting any instances or possible instances of physical violence by Mr. Depp toward any person or property, including any photographs, videos, drawings, or descriptions of any such physical violence.

Revised Request 43: Any documents referring to or reflecting any complaints against and/or criticisms of Mr. Depp for any conduct involving violence, abuse, damage to property, alcohol or drug use or abuse, intoxicated on drugs or alcohol, lateness, or tardiness from January 1, 2009 to the present.

Revised Request 45: Any documents referring to or reflecting any negative impact of the Divorce Action, the U.K. Action, and/or Ms. Heard's allegations of abuse against You on your reputation and/or career.

; and it is further

ORDERED that 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

DEFENDANT AND COUNTERCLAIM-PLAINTIFF AMBER LAURA HEARD'S MEMORANDUM IN SUPPORT OF MOTION TO COMPEL RESPONSES TO 3RD RFAs AND 14TH, 16TH AND 17TH RFPs TO PLAINTIFF AND COUNTERCLAIM-DEFENDANT JOHN C. DEPP, II

ATTACHMENT 11

FILED UNDER SEAL

(Pursuant to the Stipulated Amended Protective Order entered by the Court on June 21, 2021)

VIRGINIA:

IN THE CIRCUIT COURT OF FAIRFAX COUNTY

JOHN C. DEPP, II, Plaintiff and Counter-defendant, v. AMBER LAURA HEARD Defendant and Counter-plaintiff.	Civil Action No.: CL-2019-0002911

ORDER

Upon consideration of Plaintiff's Motion to Compel Defendant's Further Reponses Without Objections and Production of Documents in Response to His Fourth Request for Production ("Plaintiff's Motion"), the parties' respective briefs, arguments of counsel on April 30, 2021, and being fully advised, it is, this 12 day of May, 2021 hereby ORDERED as follows:

1. Plaintiff's Motion is GRANTED in part, and DENIED in part.

2. Defendant shall produce to Plaintiff by no later than Friday, May 28, 2021, all non-privileged documents responsive to the following requests contained in Plaintiff's Fourth Set of Requests for Production ("RFP's"): 2-4, 5-9, 11-14, 16, 18, 20, 22, 24, 26, 28, and 29-33. All of Defendant's objections to these requests are OVERRULED, and the temporal scope of her production shall be from January 1, 2010 forward.

3. Defendant's objections to RFP Nos. 37, 38, and 42 are OVERRULED, and Defendant shall produce all non-privileged documents responsive to these requests by no later than May 28, 2021.

4. Defendant's objections to RFP Nos. 39-41 are SUSTAINED.

5. Defendant's objections to RFP Nos. 18 and 19 are OVERRULED. By asserting defense of counsel as an affirmative defense, Defendant waived her attorney-client privilege with respect to the Op-Ed at issue in the Complaint. Accordingly, her communications on that subject are not privileged, and Defendant shall produce all communications to or from anyone, including but not limited to any of her legal counsel and/or anyone associated with the ACLU, relating in any way to the Op-Ed, and shall produce by no later than Friday, May 28 all drafts of the Op-Ed and any and all other documents responsive to RFP Nos. 18 and 19.

6. With respect to the tax returns, Defendant shall produce all information showing gross income, but may otherwise redact.

7. Defendant represents she has produced all non-privileged documents responsive to RFP Nos. 5, 7, 8 and 37.

The Honorable Penney S. Azcarate
CHIEF JUDGE - ELECT

V I R G I N I A :

IN THE CIRCUIT COURT OF FAIRFAX COUNTY, VIRGINIA

JOHN C. DEPP, II	:	
	:	
Plaintiff,	:	
	:	
v.	:	
	:	
AMBER LAURA HEARD,	:	
	:	Civil Action No.: CL-2019-0002911
Defendant.	:	
	:	
	:	
	:	

PLAINTIFF JOHN C. DEPP, II'S FOURTH SET OF REQUESTS FOR PRODUCTION TO DEFENDANT AMBER LAURA HEARD

Pursuant to Rule 4:9 of the Rules of the Supreme Court of Virginia, Plaintiff John C. Depp, II, by and through his undersigned counsel, requests that Defendant Amber Laura Heard produce the documents identified below for inspection and copying at the offices of Brown Rudnick LLP, 601 Thirteenth Street NW Suite 600, Washington, DC 20005, within twenty-one (21) days of service.

DEFINITIONS AND INSTRUCTIONS

Definitions

1. The term "Action" shall mean this litigation pending in the Circuit Court for Fairfax County captioned, *John C. Depp, II v. Amber Laura Heard,* Case No. CL-2019-0002911.

2. The term "Chat Application" shall mean any electronic program or application, usable on any device or platform, that allows the user to communicate with another person by way of exchange of text messages and/or images, including, but not limited to, iMessage,

RESPONSE:

5. All Documents and Communications that evidence or reflect the impact of Your relationship with Mr. Depp on Your reputation and/or career.

RESPONSE:

6. All Documents and Communications that evidence or reflect the impact of the Divorce Action on Your reputation and/or career.

RESPONSE:

7. All Documents and Communications that evidence or reflect the impact of the U.K. Action on Your reputation and/or career.

RESPONSE:

8. All Documents and Communications that evidence or reflect the impact of Your allegations of abuse against Mr. Depp on Your reputation and/or career.

RESPONSE:

9. All Documents and Communications that evidence or reflect the impact of any and all public statements by Adam Waldman on Your reputation and/or career.

RESPONSE:

10. All Documents and Communications that evidence or reflect the impact of any and all public statements by Mr. Depp on Your reputation and/or career.

RESPONSE:

11. All Documents and Communications that refer, reflect, or relate to any contention that You have suffered damages as a result of any alleged statement by Mr. Depp or Adam Waldman.

RESPONSE:

VIRGINIA:

IN THE CIRCUIT COURT OF FAIRFAX COUNTY

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

PLAINTIFF JOHN C. DEPP, II'S MEMORANDUM IN SUPPORT OF MOTION TO COMPEL DEFENDANT AMBER LAURA HEARD'S FURTHER RESPONSES WITHOUT OBJECTIONS AND PRODUCTION OF DOCUMENTS IN RESPONSE TO FOURTH REQUESTS FOR PRODUCTION

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Counsel for Plaintiff John C. Depp, II

RFP No. 18 seeks drafts of Ms. Heard's op-ed in the *Washington Post*, which forms the basis of Mr. Depp's Complaint for defamation. Ms. Heard's response limits the scope of production to "non-privileged" drafts. But Ms. Heard asserted the defense of advice of counsel in her fourth affirmative defense in her Answer ("Defendant relied upon counsel in writing and publishing the Op-Ed..."), which waives the privilege. Having asserted a defense that she relied on counsel in drafting the Op-ed, Ms. Heard cannot withhold drafts of the Op-ed on privilege grounds. *See, e.g., 7600 Limited Partnership v. QuesTech, Inc.*, 41 Va. Cir. 60 (1996).

RFP No. 19 seeks documents and communications regarding the op-ed in *The Washington Post* that forms the basis of Mr. Depp's Complaint in this action. The request clearly seeks directly relevant, discoverable information. Incredibly, Ms. Heard only agreed to produce drafts of the op-ed, but no communications or other documents.

III. Ms. Heard's Document Production Is Long Overdue

Ms. Heard's documents were due on January 19, 2021. Va. R. Sup. Ct. 4:9. No documents have been produced. The parties are in the midst of depositions, and the discovery cutoff is a bare two months away. Immediate production should be ordered.

IV. Ms. Heard Refuses Outright To Produce Any Documents In Response To RFP Nos. 3, 4, 5-8, 10, 15, 17, 19, 21, 23, 25, 27, and 34-42

Ms. Heard's objections to the RFPs set forth below should be overruled:

RFP Nos. 3 and 4 seek documents and contracts reflecting Ms. Heard's compensation from professional projects (i.e., acting jobs). Mr. Depp cannot properly evaluate and present evidence as to whether Ms. Heard's claim to have suffered $100 million in damages is plausible without taking discovery as to her actual and projected income and career prospects.

RFP Nos. 5, 6, 7, 8, 10 seek documents reflecting the impact of the Depp/Heard relationship, the parties' divorce, the parties' subsequent litigation, and Ms. Heard's public abuse

allegations against Mr. Depp on Ms. Heard's reputation and career. By asserting a $100 million Counterclaim for defamation, Ms. Heard put her reputation directly at issue. Mr. Depp is entitled to explore the relative impact of each of these events on Ms. Heard's career and reputation. For instance, if documents suggest that Ms. Heard's career was damaged more by the parties' widely publicized litigation than by a few tweets from Mr. Waldman, that fact would be relevant to challenge her claimed damages. Mr. Depp also contends that Ms. Heard manipulated the public and the press to falsely portray herself as a heroic survivor of abuse, in part to burnish her reputation and raise her profile, and is entitled to seek discovery to support that contention.

RFP No. 15 seeks documents related to the domestic violence restraining order sought by Ms. Heard when the parties divorced, ***in which Ms. Heard publicly alleged in court filings that she had been abused by Mr. Depp.*** While a subset of responsive documents might be privileged, any non-privileged documents that pertain to the restraining order or its contents are directly relevant. To state the obvious, ***the truth or falsity of Ms. Heard's abuse allegations are at the heart of this case.*** Documents and communications regarding the restraining order are reasonably calculated to lead to admissible evidence on that issue, and cannot be withheld.

RFP No. 17, 21, 23, 25, and 27 seek documents related to any contention that Ms. Heard suffered damages as a result of statements by Mr. Depp and Mr. Waldman that have now been eliminated as part of Ms. Heard's Counterclaim by Mr. Depp's Plea in Bar. However, the information sought by these RFPs remains relevant to a damages analysis. Mr. Depp is entitled to explore how much of Ms. Heard's $100 million in alleged damages was claimed to be attributable to the five statements that are no longer part of Ms. Heard's Counterclaim. In other words, Mr. Depp is entitled to explore issues such as whether Ms. Heard's claimed damages are attributable, in whole or in part, to earlier statements as to which any claim is time-barred.

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 Defendant and Counterclaim Plaintiff Amber Laura Heard's ("Ms. Heard") Motion to Compel Responses to Tenth Requests for Production of Documents to Plaintiff and Counterclaim Defendant John C. Depp II, pursuant to Rule 4:12 of the Rules of the Virginia Supreme Court; and upon consideration of the briefs, exhibits, and argument of counsel on August 6, 2021, it is hereby:

ORDERED that Ms. Heard's Motion is **GRANTED** in part and **DENIED** in part; and it is further

ORDERED that Plaintiff John C. Depp, II shall produce all responsive documents to the following revised Request No. 5 of Ms. Heard's Tenth Requests for Production of Documents:

> Portions of non-privileged deposition transcripts, written discovery responses (including responses to interrogatories, requests for production, and requests for admission), pleadings, exhibits to pleadings, and deposition exhibits referenced in responsive portions of deposition testimony provided in any of the "Other Litigation" [as defined in the 10th Requests for Production] relating to:
>
> a. Ms. Heard's relationship with Mr. Depp;
>
> b. To the extent not covered by the preceding category, Mr. Depp's and Ms. Heard's respective allegations of physical or emotional domestic abuse/violence;

8/25/21 no emv

c. Any alleged damage to Mr. Depp's career prospects, loss of and injury to reputation, loss of roles or economic opportunities, harm to his ability to carry on his profession, embarrassment, humiliation, emotional distress, loss of income, career interruption or lost career opportunity, as a result of alleged tardiness or behavior on set;

d. Any allegations of reputational harm, alleged damage to Mr. Depp's career prospects, loss of and injury to reputation, loss of roles or economic opportunities, harm to his ability to carry on his profession, embarrassment, humiliation, emotional distress, loss of income, career interruption or lost career opportunity, caused by the defendants in the Other Litigation;

e. Any allegations by the defendants in the Other Litigation of damage to Mr. Depp's career prospects, damage to his career prospects, loss of and injury to reputation, loss of roles or economic opportunities, harm to his ability to carry on his profession, embarrassment, humiliation, emotional distress, loss of income, career interruption or lost career opportunity;

f. Any allegations by anyone of drug and alcohol use or abuse by Mr. Depp or Ms. Heard;

g. Anything related to Mr. Depp committing property damage, including descriptions of the damage, pictures or other evidence of the damage, cost of repairs, and any other financial remuneration as a result of the property damage committed;

h. Anything related to Ms. Heard committing property damage, including descriptions of the damage, pictures or other evidence of the damage, cost of repairs, and any other financial enumeration as a result of the property damage committed;

i. Anything related to Mr. Depp's injury to his finger in March 2015; and

j. Anything related to Mr. Depp's efforts to obtain a pre-nuptial or post-nuptial agreement from Ms. Heard and any communications in connection therewith.

and it is further

ORDERED that Plaintiff John C. Depp, II shall produce all responsive documents to the following revised Request No. 6 of Ms. Heard's Tenth Requests for Production of Documents:

> All financial documents relied upon by Mr. White, or anyone else who may have been involved or participated (collectively, "Mr. White"), in preparing the documents bates numbered EWC 1-52. For purposes of clarity, this request is only seeking all underlying financial documents relied upon or referred to by Mr. White to prepare the numbers and calculations included in EWC 1-52.

and it is further

ORDERED that Plaintiff John C. Depp, II shall produce all responsive documents to the following revised Request No. 20 of Ms. Heard's Tenth Requests for Production of Documents:

> Please provide documents sufficient to reflect all loans, benefits, perks, expenses, or payments for any other reason in excess of $5,000 in either cash or value made by You from May 21, 2016 through the present, to the following (for each person the request includes if paid to an entity or someone on their behalf): Debbie Lloyd, Christi Dembrowski, Trinity Esparza, Brandon Patterson, Cornelius Harrell, Alejandro Romero, Robin Baum, Laura Divenere, Christian Carino, Jack Whigham, Tracy Jacob, Melanie Inglessis, Stephen Deuters, Sean Bett, Malcolm Connolly, Nathan Holmes, Raquel Pennington, Kate James, Jennifer Howell, Michele Mulrooney, Edward White, Melissa Saenz, Tyler Hadden, Isaac Baruch, Lisa Beane, Erin Boerum, Connell Cowan, Bobby de Leon, Gina Deuters, Josh Drew, Ben King, David Kipper, Joel Mandel, Samantha McMillen, Kevin Murphy, Todd Norman, C.J. Roberts, Tara Roberts, Anthony Romero, Trudy Salven, Sam Sarkar, Robin Schulman, Doug Stanhope, Jessica Weitz, Bruce Witkin, Keenan Wyatt, and Blair Berk.
>
> The foregoing shall not require the production of documents reflecting payments to Mr. Depp's attorneys. Mr. Depp shall also identify, in the affirmative and without stating any amounts, whether any of the above identified individuals received any salary, commissions, bonuses, or advances ("Salary") from him.

and it is further

ORDERED that Mr. Depp shall produce all documents responsive to the above Requests no later than September 17, 2021; and it is further

ORDERED that Ms. Heard's Motion to Compel Requests 10, 24 and 25 of the Tenth Requests for Production of Documents is DENIED as overbroad.

SO ORDERED.

August 19, 2021

[redacted]

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 PARTIALLY OBJECTED TO FOR THE REASONS STATED IN BRIEFING AND AT ORAL ARGUMENT:

[redacted] (by permission)

Elaine Charlson Bredehoft (VSB No. 23766)
Adam S. Nadelhaft (VSB No. 91717)
Clarissa K. Pintado (VSB No. 86882)
David E. Murphy (VSB No. 90938)
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Counsel to Defendant/Counterclaim Plaintiff, Amber Laura Heard

SEEN AND PARTIALLY OBJECTED TO FOR THE REASONS STATED IN BRIEFING AND AT ORAL ARGUMENT:

[redacted]

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

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 Defendant and Counterclaim-Plaintiff Amber Laura Heard's ("Ms. Heard") Motion to Compel Responses to Third Requests for Admissions and Responses and Full Production of Non-privileged Documents Responsive to Ms. Heard's Fourteenth, Sixteenth, and Seventeenth Requests for Production of Documents to Plaintiff and Counterclaim-Defendant John C. Depp, II ("Mr. Depp") (the "Motion"); and upon consideration of the briefs and argument of counsel, it is hereby:

ORDERED Mr. Depp shall admit or deny the authenticity of the documents included in Ms. Heard's 3rd Requests for Admissions, and for those denied by Mr. Depp, shall produce all non-privileged documents, if any, supporting such denials; and it is further

ORDERED that as to the following Requests in Ms. Heard's 17th Requests for Production of Documents brought in this Motion, Mr. Depp's objections are overruled and he shall produce the following non-privileged documents within his possession, custody, and control:

> With respect to Requests 48-59, Mr. Depp shall produce any responsive documents referring to or reflecting the incidents described in the paragraphs of Mr. Depp's 2nd Witness Statement described in those Requests;

With respect to Requests 65-72, Mr. Depp shall produce any responsive documents referring to or reflecting the incidents described in the paragraphs of Mr. Depp's 3rd Witness Statement described in those Requests;

With respect to Requests 79-91, Mr. Depp shall produce any responsive documents referring to or reflecting the incidents described in the paragraphs of the Declaration of Ms. Heard described in those Requests;

With respect to Requests 106-19, Mr. Depp shall produce any responsive documents referring to or reflecting the incidents described in the paragraphs of Ms. Heard's Witness Statement described in those Requests;

and it is further

ORDERED that as to the following Requests of Ms. Heard's 14th Requests for Production of Documents, Mr. Depp's objections are overruled and he shall produce any non-privileged documents within his possession, custody, and control responsive to the following revised Requests:

Revised Request 1: Please produce any documents supporting Mr. Depp's statement to Christian Carino in the audio recording produced as DEPP8296 that " [I] have gotten emails from every fucking studio fucking head from every motherfucker, I didn't do a thing. 'I'm sorry you're going through this. I'm so sorry.' Clearly she's out of her fucking mind. She is viewed as out of her fucking mind across the globe."

Revised Request 2: Please produce any documents supporting Mr. Depp's statement to Christian Carino in the audio recording produced as DEPP8296 that "There ain't no motherfucker in this business going to hire her."

Revised Request 3: Please produce any documents supporting Mr. Depp's statement to Christian Carino in the audio recording produced as DEPP8296 that "Oh, she's ruined. For sure. She did that herself. In terms of the business, she's a wrap."

Revised Request 13: Please produce any communications between Mr. Depp (or any of Mr. Depp's agents or employees on his behalf) and any journalist, newspaper, publication (including but not limited to The Daily Mail) referring to or reflecting any audio or video recordings (or partial recordings) of Mr. Depp or Ms. Heard.

Revised Request 14: Please produce any documents and communications referring to or reflecting any purported investigation of Ms. Heard in Australia, including but not limited to any communications sent or received between Mr. Depp (or any of Mr. Depp's agents or employees on his behalf) and any journalist, newspaper, or publication;

and it is further

ORDERED that as to the following requests in Ms. Heard's 16th Requests for Production of Documents, Mr. Depp's objections are overruled and he shall produce any non-privileged documents within his possession, custody, and control responsive to the following revised Requests:

Revised Request 1: Please produce any communications containing the word "monster" from January 1, 2012 to the present.

Revised Request 2: Please produce any documents and communications supporting the following statement from Mr. Depp's 4th Defense to the Counterclaim: "The statements forming the basis of the counterclaim were not made by the Counterclaim Defendant."

Revised Requests 3-7: Please produce any documents and communications supporting the following statements from Mr. Depp's 5th Defense to the Counterclaim:

(a)"whether or not there was authorization from Counterclaim Defendant to, or a conspiracy with, Mr. Waldman to make the statements forming the basis of the Counterclaim";
(b) "Counterclaim Defendant's lack of direction as to the subject statements";
(c) "Counterclaim Defendant's lack of direction or control of a third party as to the subject statements";
(d) "a third party exceed[ed] the scope of employment or agency relationship as to the subject statements"; and
(e) The "statements [were] made by an independent contractor."

Combined Revised Requests 8-16: Please produce any documents and communications supporting the following statement in ¶¶ 41, 42, 44-49, and 52 of your Answer to the Counterclaim- whether "that particular conduct by Mr. Waldman was authorized by Counterclaim Defendant or done at his direction."

Combined Revised Requests 17-27: Please produce any documents and communications supporting the following statement in ¶¶ 66, 66(a-f), and 67-70 of your Answer to the Counterclaim- whether "that particular conduct by Mr. Waldman was performed as an agent or was authorized by Counterclaim Defendant or done at his direction."

Revised Request 32: Please produce any communications on Mr. Depp's Devices between February 17-March 19, 2015 referring to or reflecting Mr. Depp's fingers, finger injury, severed finger, or hands.

Revised Request 37: Documents sufficient to reflect any payments made by Mr. Depp, any of Mr. Depp's entities, or agents, to anyone asserting claims against Mr. Depp for

any claims relating to the subject matter contained in Revised Request 5 regarding "Other Litigations" of the Court's August 19, 2021 Order.

Revised Request 44: Documents referring to any legal matter, demands, claims or allegations made against, about or involving Mr. Depp respecting or by any person or entity from January 1, 2009 until the present relating to the subject matter contained in Revised Request 5 regarding "Other Litigations" of the Court's August 19, 2021 Order.

Revised Request 46: Documents sufficient to reflect the settlement terms in any litigation involving Mr. Depp relating to the subject matter contained in Revised Request 5 regarding "Other Litigations" of the Court's August 19, 2021 Order.

Revised Request 38: Any video recordings, audio recordings, photographs, or images of Ms. Heard, including any copies of anything recorded by Mr. Depp or any of his entities, representatives or agents, from January 1, 2012 to the present.

Revised Request 39: Any documents that refer to or reflect any consumption or possible consumption of alcohol or drug use, or abuse, by Mr. Depp during any of the Depp Abuse of Heard Dates, the Depp Alleged Abuse by Heard Dates, or the Property Damage Dates.[1]

Revised Request 40: Any documents referring to or reflecting any instances of anger, anger management, shouting, yelling, scolding or speaking in a harsh tone, by Mr. Depp toward any person, including Ms. Heard or other females, any acquaintances, friends, dates, employees, or contractors of Mr. Depp or his companies, photographers, videographers, news reporters, and/or strangers.

Revised Request 41: Documents referring to or reflecting any efforts by Mr. Depp to cover up, deny, falsify, or misrepresent facts or events reflecting negatively upon him.

Revised Request 42: Any documents referring to or reflecting any instances or possible instances of physical violence by Mr. Depp toward any person or property, including any photographs, videos, drawings, or descriptions of any such physical violence.

Revised Request 43: Any documents referring to or reflecting any complaints against and/or criticisms of Mr. Depp for any conduct involving violence, abuse, damage to property, alcohol or drug use or abuse, intoxicated on drugs or alcohol, lateness, or tardiness from January 1, 2009 to the present.

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[1] For purposes of this Request, the phrases Depp Abuse of Heard Dates and the Depp Alleged Abuse by Heard Dates" are defined in the 16th Requests for Production of Documents. "Property Damage Dates" is defined as: "February 26-March 18, 2013; July 1-5, 2013; May 22-26, 2014; August 1-31, 2014; March 1-31, 2015; December 10-31, 2015; April 15-27, 2016; and May 15-27, 2016."

Revised Request 45: Any documents referring to or reflecting any negative impact of the Divorce Action, the U.K. Action, and/or Ms. Heard's allegations of abuse against You on your reputation and/or career;

and it is further

ORDERED that Mr. Depp comply with the above Orders, including the production of any responsive documents, no later than 5 P.M. February 28, 2022, except that for Revised Requests 2-17 of Ms. Heard's 16th Set of Requests for Production of Documents Mr. Depp shall produce any responsive documents by 5 P.M. on February 14, 2022.

SO ORDERED.

February ___, 2022

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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:

_____

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