



**RESPONSE:** No objection.

o. ***Fantastic Beasts Films.*** The phrase “Fantastic Beasts Films” collectively refers to the films “Fantastic Beasts and Where to Find Them,” “Fantastic Beasts: The Crimes of Grindelwald,” and the tentatively titled “Fantastic Beasts and Where to Find Them 3,” along with any other future film in this series referred to in any contract such as Fantastic Beasts and Where to Find Them 4 and Fantastic Beasts and Where to Find Them 5.

**RESPONSE:** No objection.

p. ***Disney.*** The phrase “Disney” refers to the Walt Disney Company and any of its divisions, parents, subsidiaries, related or affiliated companies or organizations.

**RESPONSE:** No objection.

### **REQUESTS**

1. Please produce all contracts or other communications reflecting or otherwise relating to any obligations, plans, issues, complaints, concerns, termination, and compensation to/for Mr. Depp for any relationship, marketing campaign, or advertising campaign with Christian Dior (including any campaign for Sauvage) from January 1, 2010 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. 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 to the extent 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 the terms “obligations, plans, issues, complaints, concerns” are vague and ambiguous. Plaintiff further objects to this request on the grounds that it is lacking in reasonable particularity. Plaintiff further objects to this request on the grounds that it is not reasonably tailored to the claims and defenses in this case and is harassing and overbroad.

Subject to and without waiver of the foregoing objections, Plaintiff will produce and/or has already produced documents sufficient to show compensation to/for Mr. Depp for any relationship, marketing campaign, or advertising campaign with Christian Dior.

2. For each Request for Admission in Ms. Heard's First Set of Requests for Admission that you denied either in whole or in part, please provide all documents supporting, refuting, reflecting, or otherwise relating to such denial.

**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 is overly broad and unduly burdensome taking into account the needs of the case, as to both time and scope. 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 responsive documents are obtainable from other sources that are more convenient, less burdensome, and less expensive. Plaintiff further objects to this Request on the grounds that it seeks documents that are not within

Plaintiff's possession, custody or control. Plaintiff further objects to this Request to the extent 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 is vague and ambiguous. 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 the request on the grounds that it fails to reasonably particularize or describe the categories of documents sought.

Plaintiff will not produce documents in response to this request as currently posed.

3. For each Request for Admission in Ms. Heard's Second Set of Requests for Admission that you denied either in whole or in part, please provide all documents supporting, refuting, reflecting, or otherwise relating to such denial.

**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 is overly broad and unduly burdensome taking into account the needs of the case, as to both time and scope. 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 responsive documents are obtainable from other sources that are more convenient, less burdensome, and less expensive. Plaintiff further objects to this Request on the grounds that it seeks documents that are not within Plaintiff's possession, custody or control. Plaintiff further objects to this Request to the extent 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 is vague and ambiguous. 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 the request on the grounds that it fails to reasonably particularize or describe the categories of documents sought.

Plaintiff will not produce documents in response to this request as currently posed.

4. For each Request for Admission in Ms. Heard's Third Set of Requests for Admission that you denied either in whole or in part, please provide all documents supporting, refuting, reflecting, or otherwise relating to such denial.

**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 is overly broad and unduly burdensome taking into account the needs of the case, as to both time and scope. 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 responsive documents are obtainable from other sources that are more convenient, less burdensome, and less expensive. Plaintiff further objects to this Request on the grounds that it seeks documents that are not within Plaintiff's possession, custody or control. Plaintiff further objects to this Request to the extent 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 is vague and ambiguous. 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 the request on the grounds that it fails to reasonably particularize or describe the categories of documents sought.

Plaintiff will not produce documents in response to this request as currently posed.

5. For each Request for Admission in Ms. Heard's Fourth Set of Requests for Admission that you denied either in whole or in part, please provide all documents supporting, refuting, reflecting, or otherwise relating to such denial.

**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 is overly broad and unduly burdensome taking into account the needs of the case, as to both time and scope. 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 responsive documents are obtainable from other sources that are more convenient, less burdensome, and less expensive. Plaintiff further objects to this Request on the grounds that it seeks documents that are not within Plaintiff's possession, custody or control. Plaintiff further objects to this Request to the extent 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 is vague and ambiguous. 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 the request on the grounds that it fails to reasonably particularize or describe the categories of documents sought.

Plaintiff will not produce documents in response to this request as currently posed.

6. For each Request for Admission in Ms. Heard's Fifth Set of Requests for Admission that you denied either in whole or in part, please provide all documents supporting, refuting, reflecting, or otherwise relating to such denial.

**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 is overly broad and unduly burdensome taking into account the needs of the case, as to both time and scope. 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 responsive documents are obtainable from other sources that are more convenient, less burdensome, and less expensive. Plaintiff further objects to this Request on the grounds that it seeks documents that are not within Plaintiff's possession, custody or control. Plaintiff further objects to this Request to the extent 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 is vague and ambiguous. 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 the request on the grounds that it fails to reasonably particularize or describe the categories of documents sought.

Plaintiff will not produce documents in response to this request as currently posed.

7. Please produce all documents supporting, refuting, or otherwise relating to any of Your responses to Ms. Heard's First Set of Interrogatories.

**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 is overly broad and unduly burdensome taking into account the needs of the case, as to both time and scope. 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 responsive documents are obtainable from other sources that are more convenient, less burdensome, and less expensive. Plaintiff further objects to this Request on the grounds that it seeks documents that are not within Plaintiff's possession, custody or control. Plaintiff further objects to this Request to the extent 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 is vague and ambiguous. 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 the request on the grounds that it fails to reasonably particularize or describe the categories of documents sought.

Plaintiff will not produce documents in response to this request as currently posed.

8. Please produce all documents supporting, refuting, or otherwise relating to any of Your responses to Ms. Heard's Second Set of Interrogatories.

**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 is overly broad and unduly burdensome taking into account the



needs of the case, as to both time and scope. 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 responsive documents are obtainable from other sources that are more convenient, less burdensome, and less expensive. Plaintiff further objects to this Request on the grounds that it seeks documents that are not within Plaintiff's possession, custody or control. Plaintiff further objects to this Request to the extent 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 is vague and ambiguous. 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 the request on the grounds that it fails to reasonably particularize or describe the categories of documents sought.

Plaintiff will not produce documents in response to this request as currently posed.

9. Please produce all documents sufficient to identify all of Mr. Depp's donations to any charitable organizations from 2010 to the present, including any documents referring to any time given or donated by Mr. Depp to any charitable organizations even if no monetary donation was involved.

**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 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 to the extent 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 is vague and ambiguous. Plaintiff further objects to this request on the grounds that it is lacking in reasonable particularity. Plaintiff further objects to this request on the grounds that it is not reasonably tailored to the claims and defenses in this case and is harassing and overbroad.

Plaintiff will not produce any documents in response to this Request.

Dated: March 1, 2021

Respectfully submitted,



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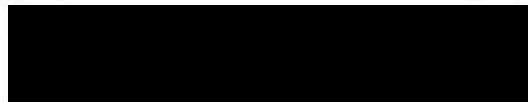
*Counsel for Plaintiff and  
Counterclaim Defendant John C. Depp, II*

**CERTIFICATE OF SERVICE**

I hereby certify that on this 1st day of March 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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