

VIRGINIA :

IN THE CIRCUIT COURT OF FAIRFAX COUNTY, VIRGINIA

JOHN C. DEPP, II

*Plaintiff and Counterclaim  
Defendant,*

v.

AMBER LAURA HEARD,

*Defendant and  
Counterclaim Plaintiff.*

Civil Action No.: CL-2019-0002911

**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

o. ***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.

p. ***Pirates of the Caribbean Films.*** The phrase “Pirates of the Caribbean Films” collectively refers to the films “Pirates of the Caribbean: The Curse of the Black Pearl,” “Pirates of the Caribbean: Dead Man’s Chest,” “Pirates of the Caribbean: At World’s End,” “Pirates of the Caribbean: On Stranger Tides,” and “Pirates of the Caribbean: Dead Men Tell No Tales.”

**RESPONSE:** No objection.

q. ***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.

r. ***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.

s. ***Inventory.***

- (i) The term “Inventory” in relation to a computer refers to a forensic image of any computers (including Laptops and Desktops), operating systems, or drives sufficient to identify: a) the computer by manufacturer, make, model, and serial number; b) the type of forensic image taken/created (e.g. logical, advanced logical, write-blocked Raw (DD) non-segmented forensic image, etc.); c) the

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/checkra!n 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.”

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,

ambiguous, and overbroad. Plaintiff further objects to this Request on the grounds that it seeks documents and/or information that is 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 and unreasonably intrusive 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 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.

5. Please produce an Inventory of the iPad 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, ambiguous, and overbroad. Plaintiff further objects to this Request on the grounds that it seeks documents and/or information that is 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 and unreasonably intrusive 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 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.

6. Please produce an Inventory of the MacBook Pro 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, ambiguous, and overbroad. Plaintiff further objects to this Request on the grounds that it seeks documents and/or information that is 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 and unreasonably intrusive 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 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.

7. Please produce an Inventory of the iCloud account 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, ambiguous, and overbroad. Plaintiff further objects to this Request on the grounds that it seeks documents and/or information that is 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 and unreasonably intrusive 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 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.

8. Please produce an Inventory of the iPhone belonging to Stephen Deuters collected in May 2017 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 this Request openly and improperly relates to a device belonging to a third party. 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, ambiguous, and overbroad. Plaintiff further objects to this Request on the grounds that it seeks documents and/or information that is 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 and unreasonably intrusive 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 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.

9. Please produce an Inventory of the iPad belonging to Stephen Deuters collected in May 2017 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 this Request openly and improperly relates to a device belonging to a third party and exceeds the permissible scope of discovery as to that third party. 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, ambiguous,

and overbroad. Plaintiff further objects to this Request on the grounds that it seeks documents and/or information that is 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 and unreasonably intrusive 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 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.

10. Please produce an Inventory of any additional “devices and data” belonging to Stephen Deuters that Mr. Depp confirmed under penalty of perjury are in his possession, custody, and control and contain ESI that relate to the claims or defenses in this case (or are 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 this Request openly and improperly relates to a device belonging to a third party and exceeds the

permissible scope of discovery as to that third party. 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, ambiguous, and overbroad. Plaintiff further objects to this Request on the grounds that it seeks documents and/or information that is 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 and unreasonably intrusive 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 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.

11. Please produce an Inventory of the iPhone belonging to Nathan Holmes collected in March 2018 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 this Request openly and improperly relates to a device belonging to a third party and exceeds the permissible scope of discovery as to that third party. 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, ambiguous, and overbroad. Plaintiff further objects to this Request on the grounds that it seeks documents and/or information that is 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 and unreasonably intrusive 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 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.

12. Please produce an Inventory of any additional “devices and data” belonging to Nathan Holmes collected in March 2018 that Mr. Depp confirmed under penalty of perjury are in his possession, custody, and control and contain ESI that relate to the claims or defenses in this case (or are 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 this Request openly and improperly relates to a device belonging to a third party and exceeds the permissible scope of discovery as to that third party. 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, ambiguous, and overbroad. Plaintiff further objects to this Request on the grounds that it seeks documents and/or information that is 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 and unreasonably intrusive 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 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,



Benjamin G. Chew (VSB #29113)  
Andrew C. Crawford (VSB #89093)  
BROWN RUDNICK, LLP  
601 Thirteenth Street NW, Suite 600  
Washington, DC 20005  
Phone: (202) 536-1785  
Fax: (617) 289-0717  
bchew@brownrudnick.com  
acrawford@brownrudnick.com

Leo J. Presiado (*pro hac vice*)  
Camille M. Vasquez (*pro hac vice*)  
Samuel A. Moniz (*pro hac vice*)  
BROWN RUDNICK, LLP  
2211 Michelson Drive, Seventh Floor  
Irvine, CA 92612  
Phone: (949) 752-7100  
Fax: (949) 252-1514  
lpresiado@brownrudnick.com  
cvasquez@brownrudnick.com  
smoniz@brownrudnick.com

Jessica N. Meyers (*pro hac vice*)  
BROWN RUDNICK LLP  
7 Times Square  
New York, New York 10036  
Phone: (212) 209-4938  
Fax: (212) 209-4801  
jmeyers@brownrudnick.com

*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:

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

Elaine Charlson Bredehoft  
Adam S. Nadelhaft  
Clarissa K. Pintado  
David E. Murphy  
Charlson Bredehoft Cohen & Brown, P.C.  
11260 Roger Bacon Drive, Suite 201  
Reston, Virginia 20190  
Telephone: (703) 318-6800  
ebredehoft@cbcblaw.com  
anadelhaft@cbcblaw.com  
cpintado@cbcblaw.com  
dmurphy@cbcblaw.com



Andrew C. Crawford (VSB #89093)