

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 FIFTEENTH 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") Fifteenth Set of Requests for Production of Documents (each, a "Request" and collectively, the "Requests"), dated November 12, 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.

t. ***Mr. Depp’s Devices.*** The phrase “Mr. Depp’s Devices” refers to the devices that Mr. Depp identified in response to Interrogatory No. 3 of Ms. Heard’s 1st Set of Interrogatories under penalty of perjury were in his possession, custody, and control and on which ESI that relates to the claims or defenses in this case, or is reasonably likely to lead to the

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 photographs and deleted photographs of Ms. Heard on Mr. Depp's Devices during the time period of the Depp Abuse of Heard Dates, 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 and explicit limitation of permissible discovery to "photographs reflecting injuries." 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, 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.

Subject to and without waiving the foregoing objections, Plaintiff responds as follows: Plaintiff will produce and/or has already produced all photographs of Ms. Heard in his possession, custody, or control during the time periods outlined in paragraph 6 of the Court’s November 8, 2021 Order in native form with all metadata. Further, Plaintiff is not aware of any deleted photographs of Ms. Heard in his possession, custody, or control during the aforementioned time periods and the Court has denied Ms. Heard’s request to forensically image Mr. Depp’s devices.

2. Please produce all video recordings and deleted video recordings of Ms. Heard on Mr. Depp’s Devices during the time period of the Depp Abuse of Heard Dates, 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, 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.

Subject to and without waiving the foregoing objections, Plaintiff responds as follows: Plaintiff will produce and/or has already produced all video recordings of Ms. Heard in his possession, custody, or control during the time periods outlined in paragraph 6 of the Court's November 8, 2021 Order in native form with all metadata. Further, Plaintiff is not aware of any deleted video recordings of Ms. Heard in his possession, custody, or control during the aforementioned time periods and the Court has denied Ms. Heard's request to forensically image Mr. Depp's devices.

3. Please produce all audio recordings and deleted audio recordings of Ms. Heard on Mr. Depp's Devices during the time period of the Depp Abuse of Heard Dates, 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, 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.

Subject to and without waiving the foregoing objections, Plaintiff responds as follows: Plaintiff will produce and/or has already produced all audio recordings of Ms. Heard in his possession, custody, or control during the time periods outlined in paragraph 6 of the Court's November 8, 2021 Order in native form with all metadata. Further, Plaintiff is not aware of any deleted audio recordings of Ms. Heard in his possession, custody, or control during the

aforementioned time periods and the Court has denied Ms. Heard's request to forensically image Mr. Depp's devices.

4. Please produce Mr. Depp's Devices for purposes of forensic imaging by Mr. Depp's Forensic Experts (under the supervision of Ms. Heard's Ms. Heard's [sic] forensic discovery consultant Mr. Ackert, either in person or by Zoom) for purposes of extraction of all photographs, video recordings, or audio recordings (or deleted photographs, video recordings, or audio recordings) of Ms. Heard during the time period of the Depp Abuse of Heard Dates.

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 appears to have been served for purposes of harassment. 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 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 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).

5. Please produce all photographs and deleted photographs of Mr. Depp on Mr. Depp’s Devices during the time period of the Depp Abuse of Heard Dates, 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 and explicit limitation of permissible discovery to “photographs reflecting injuries.” 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, 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.

6. Please produce all video recordings and deleted video recordings of Mr. Depp on Mr. Depp’s Devices during the time period of the Depp Abuse of Heard Dates, 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, 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.

7. Please produce all audio recordings and deleted audio recordings of Mr. Depp on Mr. Depp’s Devices during the time period of the Depp Abuse of Heard Dates, 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 and explicit limitation of permissible discovery to “photographs reflecting injuries.” 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, 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.

8. Please produce Mr. Depp’s Devices for purposes of forensic imaging by Mr. Depp’s Forensic Experts (under the supervision of Ms. Heard’s Ms. Heard’s [sic] forensic discovery consultant Mr. Ackert, either in person or by Zoom) for purposes of extraction of all photographs, video recordings, or audio recordings (or deleted photographs, video recordings, or audio recordings) of Mr. Depp during the time period of the Depp Abuse of Heard Dates.

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 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).

9. Please produce all photographs and deleted photographs reflecting any damage to property on Mr. Depp’s Devices during the time period of the Depp Abuse of Heard Dates, 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 that this

Request is overbroad, 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 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 and explicit limitation of permissible discovery to "photographs reflecting injuries." 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, 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.

Subject to and without waiving the foregoing objections, Plaintiff responds as follows: Plaintiff will produce and/or has already produced all photographs reflecting damage to property in his possession, custody, or control during the time periods outlined in paragraph 6 of the

Court's November 8, 2021 Order in native form with all metadata. Further, Plaintiff is not aware of any deleted photographs reflecting damage to property in his possession, custody, or control during the aforementioned time periods and the Court has denied Ms. Heard's request to forensically image Mr. Depp's devices.

10. Please produce all video recordings and deleted video recordings reflecting any damage to property on Mr. Depp's Devices during the time period of the Depp Abuse of Heard Dates, 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 that this Request is overbroad, 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 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, 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.

Subject to and without waiving the foregoing objections, Plaintiff responds as follows: Plaintiff will produce and/or has already produced all video recordings reflecting any damage to property in his possession, custody, or control during the time periods outlined in paragraph 6 of the Court’s November 8, 2021 Order in native form with all metadata. Further, Plaintiff is not aware of any deleted video recordings reflecting any damage to property in his possession, custody, or control during the aforementioned time periods and the Court has denied Ms. Heard’s request to forensically image Mr. Depp’s devices.

11. Please produce all audio recordings and deleted audio recordings reflecting any damage to property on Mr. Depp’s Devices during the time period of the Depp Abuse of Heard Dates, 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 on the grounds that the very nature of this

Request is vague, ambiguous, unintelligible, and overbroad, including because it seeks “audio recordings reflecting any damage to property.” 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, 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.

12. Please produce Mr. Depp’s Devices for purposes of forensic imaging by Mr. Depp’s Forensic Experts (under the supervision of Ms. Heard’s Ms. Heard’s [sic] forensic discovery consultant Mr. Ackert, either in person or by Zoom) for purposes of extraction of all photographs, video recordings, or audio recordings (or deleted photographs, video recordings, or audio recordings) of any damage to property during the time period of the Depp Abuse of Heard Dates.

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 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 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).

13. Please produce all communications sent or received by Mr. Depp that refer or relate to Ms. Heard during the time period of the Depp Abuse of Heard Dates, 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, 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.

Subject to and without waiving the foregoing objections, Plaintiff responds as follows: Plaintiff will produce and/or has already produced non-privileged communications sent or

received by Mr. Depp that regarding Ms. Heard during the time period outlined in paragraph 6 of the Court's November 8, 2021 Order in native form with all metadata.

14. Please produce all photographs and deleted photographs of Mr. Depp on Mr. Depp's Devices that Mr. Depp contends show any injuries or otherwise evidence any alleged abuse of Mr. Depp by Ms. Heard, 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 and explicit limitation of permissible discovery to "photographs reflecting injuries." 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 as duplicative of Request 5. 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, 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.

Subject to and without waiving the foregoing objections, Plaintiff responds as follows: Plaintiff will produce and/or has already produced all photographs of Mr. Depp reflecting his injuries in his possession, custody, or control during the time periods outlined in paragraph 6 of the Court's November 8, 2021 Order in native form with all metadata. Further, Plaintiff is not aware of any deleted photographs of Mr. Depp reflecting his injuries in his possession, custody, or control during the aforementioned time periods and the Court has denied Ms. Heard's request to forensically image Mr. Depp's devices.

15. Please produce all video recordings and deleted video recordings of Mr. Depp on Mr. Depp's Devices that Mr. Depp contends show any injuries or otherwise evidence any alleged abuse of Mr. Depp by Ms. Heard, 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 as duplicative of Request 6. 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, 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.

Subject to and without waiving the foregoing objections, Plaintiff responds as follows: Plaintiff will produce and/or has already produced all video recordings of Mr. Depp, if any, that show any injuries or otherwise evidence any alleged abuse of Mr. Depp by Ms. Heard, in his possession, custody, or control during the time periods outlined in paragraph 6 of the Court’s November 8, 2021 Order in native form with all metadata. Further, Plaintiff is not aware of any deleted video recordings of Mr. Depp in his possession, custody, or control during the aforementioned time periods and the Court has denied Ms. Heard’s request to forensically image Mr. Depp’s devices.

16. Please produce all audio recordings and deleted audio recordings of Mr. Depp on Mr. Depp’s Devices that Mr. Depp contends relate to any injuries or otherwise evidence any alleged abuse of Mr. Depp by Ms. Heard, 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 as duplicative of Request 7. 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, 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.

Subject to and without waiving the foregoing objections, Plaintiff responds as follows: Plaintiff will produce and/or has already produced all audio recordings of Mr. Depp relating to any injuries or alleged abuse of Mr. Depp by Ms. Heard, if any, in his possession, custody, or control during the time periods outlined in paragraph 6 of the Court's November 8, 2021 Order in native form with all metadata. Further, Plaintiff is not aware of any deleted video recordings

of Mr. Depp in his possession, custody, or control during the aforementioned time periods and the Court has denied Ms. Heard's request to forensically image Mr. Depp's devices.

17. Please produce all photographs and deleted photographs of Mr. Depp on Mr. Depp's Devices during the time period of the Depp Alleged Abuse by Heard Dates, 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 and explicit limitation of permissible discovery to "photographs reflecting injuries." 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 as duplicative of Requests 5 and 14. 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, 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.

Subject to and without waiving the foregoing objections, Plaintiff responds as follows: Plaintiff will produce and/or has already produced all photographs of Mr. Depp reflecting his injuries in his possession, custody, or control during the time periods outlined in Defendant's definition of "Depp Alleged Abuse by Heard" in native form with all metadata. Further, Plaintiff is not aware of any deleted photographs of Mr. Depp reflecting his injuries in his possession, custody, or control during the aforementioned time periods and the Court has denied Ms. Heard's request to forensically image Mr. Depp's devices.

18. Please produce all video recordings and deleted video recordings of Mr. Depp on Mr. Depp's Devices during the time period of the Depp Alleged Abuse by Heard Dates, 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 as duplicative of Requests 6 and 15. 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, 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.

Subject to and without waiving the foregoing objections, Plaintiff responds as follows: Plaintiff will produce and/or has already produced all video recordings of Mr. Depp that show any injuries or otherwise evidence any alleged abuse of Mr. Depp by Ms. Heard, if any, in his possession, custody, or control during the time periods outlined in Defendant’s definition of “Depp Alleged Abuse by Heard” in native form with all metadata. Further, Plaintiff is not aware of any deleted video recordings of Mr. Depp in his possession, custody, or control during the aforementioned time periods and the Court has denied Ms. Heard’s request to forensically image Mr. Depp’s devices.

19. Please produce all audio recordings and deleted audio recordings of Mr. Depp on Mr. Depp’s Devices during the time period of the Depp Alleged Abuse by Heard Dates, 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 as duplicative of Requests 7 and 16. 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, 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.

20. Please produce Mr. Depp's Devices for purposes of forensic imaging by Mr. Depp's Forensic Experts (under the supervision of Ms. Heard's Ms. Heard's [sic] forensic discovery consultant Mr. Ackert, either in person or by Zoom) for purposes of extraction of all photographs, video recordings, or audio recordings (or deleted photographs, video recordings, or audio recordings) of Mr. Depp during the time period of the Depp Alleged Abuse by Heard Dates.

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 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 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).

21. Please produce all photographs and deleted photographs of Ms. Heard on Mr. Depp's Devices during the time period of the Depp Alleged Abuse by Heard Dates, 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 and explicit limitation of permissible discovery to "photographs reflecting injuries." 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 is duplicative of Request 1. 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, 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.

22. Please produce all video recordings and deleted video recordings of Ms. Heard on Mr. Depp’s Devices during the time period of the Depp Alleged Abuse by Heard Dates, 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 on the grounds that it is duplicative of Request 2. 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, 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.

Subject to and without waiving the foregoing objections, Plaintiff responds as follows: Plaintiff will produce and/or has already produced all video recordings of Ms. Heard, if any, in his possession, custody, or control during the time periods outlined in Defendant’s definition of “Depp Alleged Abuse by Heard” in native form with all metadata. Further, Plaintiff is not aware of any deleted video recordings of Ms. Heard in his possession, custody, or control during the aforementioned time periods and the Court has denied Ms. Heard’s request to forensically image Mr. Depp’s devices.

23. Please produce all audio recordings and deleted audio recordings of Ms. Heard on Mr. Depp’s Devices during the time period of the Depp Alleged Abuse by Heard Dates, 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 on the grounds that it is duplicative of

Request 3. 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, 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.

Subject to and without waiving the foregoing objections, Plaintiff responds as follows: Plaintiff will produce and/or has already produced all audio recordings of Ms. Heard in his possession, custody, or control during the time periods outlined in Defendant’s definition of “Depp Alleged Abuse by Heard” in native form with all metadata. Further, Plaintiff is not aware of any deleted audio recordings of Ms. Heard in his possession, custody, or control during the aforementioned time periods and the Court has denied Ms. Heard’s request to forensically image Mr. Depp’s devices.

24. Please produce Mr. Depp’s Devices for purposes of forensic imaging by Mr. Depp’s Forensic Experts (under the supervision of Ms. Heard’s Ms. Heard’s [sic] forensic discovery consultant Mr. Ackert, either in person or by Zoom) for purposes of extraction of all photographs, video recordings, or audio recordings (or deleted photographs, video recordings, or audio recordings) of Ms. Heard during the time period of the Depp Alleged Abuse by Heard Dates.

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 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 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).

25. Please produce all photographs and deleted photographs of any damage to property on Mr. Depp's Devices during the time period of the Depp Alleged Abuse by Heard Dates, 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 and explicit limitation of permissible discovery to "photographs reflecting injuries." 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 is duplicative of Request 9. 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, 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.

Subject to and without waiving the foregoing objections, Plaintiff responds as follows: Plaintiff will produce and/or has already produced all photographs reflecting damage to property, if any, in his possession, custody, or control during the time periods outlined in Defendant’s definition of “Depp Alleged Abuse by Heard” in native form with all metadata. Further, Plaintiff is not aware of any deleted photographs reflecting damage to property in his possession, custody, or control during the aforementioned time periods and the Court has denied Ms. Heard’s request to forensically image Mr. Depp’s devices.

26. Please produce all video recordings and deleted video recordings of any damage to property on Mr. Depp’s Devices during the time period of the Depp Alleged Abuse by Heard Dates, 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 on the grounds that it is duplicative of

Request 10. 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, 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.

Subject to and without waiving the foregoing objections, Plaintiff responds as follows: Plaintiff will produce and/or has already produced all video recordings reflecting any damage to property in his possession, custody, or control during the time periods outlined in Defendant’s definition of “Depp Alleged Abuse by Heard” in native form with all metadata. Further, Plaintiff is not aware of any deleted video recordings reflecting any damage to property in his possession, custody, or control during the aforementioned time periods and the Court has denied Ms. Heard’s request to forensically image Mr. Depp’s devices.

27. Please produce all audio recordings and deleted audio recordings of any damage to property on Mr. Depp’s Devices during the time period of the Depp Alleged Abuse by Heard Dates, 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 on the grounds that the very nature of this Request is vague, ambiguous, unintelligible, and overbroad, including because it seeks "audio recordings of any damage to property." Plaintiff further objects to this Request on the grounds that it is duplicative of Request 11. 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, 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.

28. Please produce Mr. Depp's Devices for purposes of forensic imaging by Mr. Depp's Forensic Experts (under the supervision of Ms. Heard's Ms. Heard's [sic] forensic discovery consultant Mr. Ackert, either in person or by Zoom) for purposes of extraction of all photographs, video recordings, or audio recordings (or deleted photographs, video

recordings, or audio recordings) of any damage to property during the time period of the Depp Alleged Abuse by Heard Dates.

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 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 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).

29. Please produce all photographs and video recordings (or deleted photographs and video recordings) of the inside, outside, or any portion of Ms. Heard's Los Angeles home, (as described in ¶ 6 of Ms. Heard's April 10, 2019 Declaration) on Mr. Depp's Devices between February 26-March 18, 2013, 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 and explicit limitation of permissible discovery to "photographs reflecting injuries." 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 is vague, ambiguous, and overbroad, including because "Ms. Heard's Los Angeles home" is undefined. 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, 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.

30. Please produce Mr. Depp’s Devices for purposes of forensic imaging by Mr. Depp’s Forensic Experts (under the supervision of Ms. Heard’s Ms. Heard’s [sic] forensic discovery consultant Mr. Ackert, either in person or by Zoom) for purposes of extraction of all photographs and video recordings (or deleted photographs or video recordings) of the inside, outside, or any portion of Ms. Heard’s Los Angeles home (as described in ¶ 6 of Ms. Heard’s April 10, 2019 Declaration) between February 26-March 18, 2013.

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 is vague, ambiguous, and overbroad, including because “Ms. Heard’s Los Angeles home” is undefined. 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 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).

31. Please produce all photographs and video recordings (or deleted photographs and video recordings) of the inside, outside, or any portion of the Boston Plane (as described in ¶¶ 7-8 of Ms. Heard’s April 10, 2019 Declaration) on Mr. Depp’s Devices between May 22-May 26, 2014, 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 and explicit limitation of permissible discovery to "photographs reflecting injuries." 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 is vague, ambiguous, and overbroad, including because "Boston Plane" is undefined. 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, 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.

32. Please produce Mr. Depp's Devices for purposes of forensic imaging by Mr. Depp's Forensic Experts (under the supervision of Ms. Heard's Ms. Heard's [sic] forensic discovery consultant Mr. Ackert, either in person or by Zoom) for purposes of extraction of all photographs and video recordings (or deleted photographs or video recordings) of the inside, outside, or any portion of the Boston Plane (as described in ¶¶ 7-8 of Ms. Heard's April 10, 2019 Declaration) between May 22- May 26, 2014.

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 is vague, ambiguous, and overbroad, including because "Boston Plane" is undefined. 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 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).

33. Please produce all photographs and video recordings (or deleted photographs and video recordings) of the inside, outside, or any portion of the house in the Bahamas (as described in ¶¶ 9-11 of Ms. Heard's April 10, 2019 Declaration) on Mr. Depp's Devices between August 1-31, 2014, 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 and explicit limitation of permissible discovery to "photographs reflecting injuries." 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 is vague, ambiguous, and overbroad, including because "the house in the Bahamas" is undefined. 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, 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.

34. Please produce Mr. Depp’s Devices for purposes of forensic imaging by Mr. Depp’s Forensic Experts (under the supervision of Ms. Heard’s Ms. Heard’s [sic] forensic discovery consultant Mr. Ackert, either in person or by Zoom) for purposes of extraction of all photographs and video recordings (or deleted photographs or video recordings) of the inside, outside, or any portion of the house in the Bahamas (as described in ¶¶ 9-11 of Ms. Heard’s April 10, 2019 Declaration) between August 1-31, 2014.

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 is vague, ambiguous, and overbroad, including because “the house in the Bahamas” is undefined. 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 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).

35. Please produce all photographs and video recordings (or deleted photographs and video recordings) of the inside, outside, or any portion of the house in Australia (as described in ¶¶ 14-18 of Ms. Heard’s April 10, 2019 Declaration) on Mr. Depp’s Devices between March 1-31, 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 and explicit limitation of permissible discovery to "photographs reflecting injuries." 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 is vague, ambiguous, and overbroad, including because "the house in Australia" is undefined. 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, 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.

36. Please produce Mr. Depp's Devices for purposes of forensic imaging by Mr. Depp's Forensic Experts (under the supervision of Ms. Heard's Ms. Heard's [sic] forensic discovery consultant Mr. Ackert, either in person or by Zoom) for purposes of extraction of all photographs and video recordings (or deleted photographs or video recordings) of the inside, outside, or any portion of the house in Australia (as described in ¶¶ 14-18 of Ms. Heard's April 10, 2019 Declaration) between March 1-31, 2015.

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 is vague, ambiguous, and overbroad, including because "the house in Australia" is undefined. 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 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).

37. Please produce all photographs and video recordings (or deleted photographs and video recordings) of the inside, outside, or any portion of the Eastern Columbia Building and/or any Penthouses owned by Mr. Depp in the Eastern Columbia Building (as described in ¶¶ 19-20 of Ms. Heard's April 10, 2019 Declaration) on Mr. Depp's Devices between March 1-31, 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 November 8, 2021 Order explicitly denying Ms. Heard's motion to compel Mr. Depp's devices for forensic imaging. 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 vague, ambiguous, and overbroad, including because "the inside, outside, or any portion of the Eastern Columbia Building and/or any Penthouses owned by Mr. Depp in the Eastern Columbia Building" is undefined. 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, 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.

38. Please produce Mr. Depp’s Devices for purposes of forensic imaging by Mr. Depp’s Forensic Experts (under the supervision of Ms. Heard’s Ms. Heard’s [sic] forensic discovery consultant Mr. Ackert, either in person or by Zoom) for purposes of extraction of all photographs and video recordings (or deleted photographs or video recordings) of the inside, outside, or any portion of the Eastern Columbia Building and/or any Penthouses owned by Mr. Depp in the Eastern Columbia Building (as described in ¶¶ 19-20 of Ms. Heard’s April 10, 2019 Declaration) between March 1-31, 2015.

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 is vague, ambiguous, and overbroad, including because “the inside, outside, or any portion of the Eastern Columbia Building and/or any Penthouses owned by Mr. Depp in the Eastern Columbia Building” is undefined. 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 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).

39. Please produce all photographs and video recordings (or deleted photographs and video recordings) of the inside, outside, or any portion of the Eastern Columbia Building and/or any Penthouses owned by Mr. Depp in the Eastern Columbia Building (as described in ¶¶ 23-33 of Ms. Heard’s April 10, 2019 Declaration) on Mr. Depp’s Devices between December 10-21, 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 and explicit limitation of permissible discovery to "photographs reflecting injuries." 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 is vague, ambiguous, and overbroad, including because "the inside, outside, or any portion of the Eastern Columbia Building and/or any Penthouses owned by Mr. Depp in the Eastern Columbia Building" is undefined. 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, 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.

40. Please produce Mr. Depp's Devices for purposes of forensic imaging by Mr. Depp's Forensic Experts (under the supervision of Ms. Heard's Ms. Heard's [sic] forensic discovery consultant Mr. Ackert, either in person or by Zoom) for purposes of extraction of all photographs and video recordings (or deleted photographs or video recordings) of the inside, outside, or any portion of the Eastern Columbia Building and/or any

Penthouses owned by Mr. Depp in the Eastern Columbia (as described in ¶¶ 23-33 of Ms. Heard's April 10, 2019 Declaration) between December 10-21, 2015.

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 and explicit limitation of permissible discovery to "photographs reflecting injuries." 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 is vague, ambiguous, and overbroad, including because "the inside, outside, or any portion of the Eastern Columbia Building and/or any Penthouses owned by Mr. Depp in the Eastern Columbia Building" is undefined. 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, 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 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).

41. Please produce all photographs and video recordings (or deleted photographs and video recordings) of the inside, outside, or any portion of the Eastern Columbia Building and/or any Penthouses owned by Mr. Depp in the Eastern Columbia Building (as described in ¶¶ 34-35 of Ms. Heard’s April 10, 2019 Declaration) on Mr. Depp’s Devices between April 15-27, 2016, 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 and explicit limitation of permissible discovery to “photographs reflecting injuries.” 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 is vague, ambiguous,

and overbroad, including because “the inside, outside, or any portion of the Eastern Columbia Building and/or any Penthouses owned by Mr. Depp in the Eastern Columbia Building” is undefined. 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, 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.

42. Please produce Mr. Depp’s Devices for purposes of forensic imaging by Mr. Depp’s Forensic Experts (under the supervision of Ms. Heard’s Ms. Heard’s [sic] forensic discovery consultant Mr. Ackert, either in person or by Zoom) for purposes of extraction of all photographs and video recordings (or deleted photographs or video recordings) of the inside, outside, or any portion of the Eastern Columbia Building and/or any Penthouses owned by Mr. Depp in the Eastern Columbia (as described in ¶¶ 34-35 of Ms. Heard’s April 10, 2019 Declaration) between April 15-27, 2016.

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 and explicit limitation of permissible discovery to "photographs reflecting injuries." 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 is vague, ambiguous, and overbroad, including because "the inside, outside, or any portion of the Eastern Columbia Building and/or any Penthouses owned by Mr. Depp in the Eastern Columbia Building" is undefined. 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 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).

43. Please produce all photographs and video recordings (or deleted photographs and video recordings) of the inside, outside, or any portion of the Eastern Columbia Building and/or any Penthouses owned by Mr. Depp in the Eastern Columbia Building (as described in ¶¶ 36-42 of Ms. Heard's April 10, 2019 Declaration) on Mr. Depp's Devices between May 15-27, 2016, 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 and explicit limitation of permissible discovery to "photographs reflecting injuries." 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 is vague, ambiguous, and overbroad, including because "the inside, outside, or any portion of the Eastern Columbia Building and/or any Penthouses owned by Mr. Depp in the Eastern Columbia Building" is undefined. 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, 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.

44. Please produce Mr. Depp’s Devices for purposes of forensic imaging by Mr. Depp’s Forensic Experts (under the supervision of Ms. Heard’s Ms. Heard’s [sic] forensic discovery consultant Mr. Ackert, either in person or by Zoom) for purposes of extraction of all photographs and video recordings (or deleted photographs or video recordings) of the inside, outside, or any portion of the Eastern Columbia Building and/or any Penthouses owned by Mr. Depp in the Eastern Columbia (as described in ¶¶ 36-42 of Ms. Heard’s April 10, 2019 Declaration) between May 15-27, 2016.

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 and explicit limitation of permissible discovery to “photographs reflecting injuries.” 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 is vague, ambiguous, and overbroad, including because “the inside, outside, or any portion of the Eastern Columbia Building and/or any Penthouses owned by Mr. Depp in the Eastern Columbia Building” is undefined. 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 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).

45. Please produce all photographs and video recordings (or deleted photographs and video recordings) of the property Mr. Depp and Ms. Heard stayed at in Hicksville, including but not limited to the inside, outside, or any portion of all trailers, cabins, and campfires (as described in ¶ 21 of Ms. Heard’s February 26, 2020 Third Witness Statement in the UK Litigation) on Mr. Depp’s Devices between June 1-July 5, 2013, 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 and explicit limitation of permissible discovery to "photographs reflecting injuries." 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 is vague, ambiguous, and overbroad, including because it seeks "*all* photographs and video recordings (or deleted photographs and video recordings) of the property Mr. Depp and Ms. Heard stayed at in Hicksville, *including but not limited to the inside, outside, or any portion of all trailers, cabins, and campfires.*" 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, 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.

46. Please produce Mr. Depp's Devices for purposes of forensic imaging by Mr. Depp's Forensic Experts (under the supervision of Ms. Heard's Ms. Heard's [sic] forensic discovery consultant Mr. Ackert, either in person or by Zoom) for purposes of extraction of all photographs and video recordings (or deleted photographs or video recordings) of the property Mr. Depp and Ms. Heard stayed at in Hicksville, including but not limited to the inside, outside, or any portion of all trailers, cabins, and campfires (as described in ¶

21 of Ms. Heard's February 26, 2020 Third Witness Statement in the UK Litigation) between June 1-July 5, 2013.

RESPONSE:

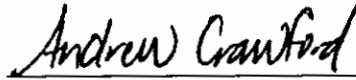
Plaintiff repeats and incorporates by this reference the General Objections and Objections to Definitions and Instruction above, as though set forth in full. Plaintiff further objects to this Request on the grounds that it seeks documents that are neither relevant nor reasonably calculated to lead to 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 and explicit limitation of permissible discovery to "photographs reflecting injuries." 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 is vague, ambiguous, and overbroad, including because it seeks "*all* photographs and video recordings (or deleted photographs and video recordings) of the property Mr. Depp and Ms. Heard stayed at in Hicksville, *including but not limited to the inside, outside, or any portion of all trailers, cabins, and campfires.*" 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, 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 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).

Dated: December 3, 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 3rd 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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