

**VIRGINIA:**

**IN THE CIRCUIT COURT OF FAIRFAX COUNTY, VIRGINIA**

JOHN C. DEPP, II :  
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 *Plaintiff and Counterclaim* :  
 *Defendant,* :  
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 v. :  
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 :  
 AMBER LAURA HEARD, : Civil Action No.: CL-2019-0002911  
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 :  
 *Defendant and* :  
 *Counterclaim Plaintiff.* :  
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**PLAINTIFF AND COUNTERCLAIM DEFENDANT JOHN C. DEPP, II’S RESPONSES AND OBJECTIONS TO DEFENDANT AND COUNTERCLAIM PLAINTIFF AMBER LAURA HEARD’S SIXTEENTH REQUEST FOR PRODUCTION**

Pursuant to Rule 4:9 of the Rules of the Supreme Court of Virginia, Plaintiff and Counterclaim Defendant John C. Depp, II (“Plaintiff” and/or “Mr. Depp”), by and through his undersigned counsel, hereby responds and objects to Defendant and Counterclaim Plaintiff Amber Laura Heard’s (“Defendant” and/or “Ms. Heard”) Sixteenth Set of Requests for Production of Documents (each, a “Request” and collectively, the “Requests”), dated November 19, 2021 and served in the above captioned action (“Action”) as follows:

**GENERAL OBJECTIONS**

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

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

#### **RESPONSE:**

Plaintiff repeats and incorporates by this reference the General Objections and Objections to Definitions and Instruction above, as though set forth in full. Plaintiff further objects to this Request on the grounds that it seeks documents that are neither relevant nor reasonably calculated to lead to the discovery of admissible evidence. Plaintiff further objects to this Request on the grounds that it is overly broad and unduly burdensome taking into account the needs of the case, including because it seeks "all" documents and communications. Plaintiff further objects to this Request as harassing because it seeks information unrelated to the subject matter of this case. Plaintiff further objects to this Request on the grounds that it is lacking in reasonable particularity. Plaintiff further objects to this Request on the grounds that it seeks documents that are protected by the attorney-client privilege, work-product doctrine, or any other applicable privilege, immunity, or protection. Plaintiff further objects to this Request on the grounds that it seeks private or confidential documents. Plaintiff further objects to this Request on the grounds that it is duplicative of other discovery. Plaintiff further objects to this Request

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

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

**RESPONSE:**

Plaintiff repeats and incorporates by this reference the General Objections and Objections to Definitions and Instruction above, as though set forth in full. Plaintiff further objects to this Request on the grounds that it seeks documents that are neither relevant nor reasonably calculated to lead to the discovery of admissible evidence. Plaintiff further objects to this Request on the grounds that it is overly broad and unduly burdensome taking into account the needs of the case, including because it seeks "all" documents and communications. Plaintiff further objects to this Request as harassing because it seeks information unrelated to the subject matter of this case. Plaintiff further objects to this Request on the grounds that it is lacking in reasonable particularity. Plaintiff further objects to this Request on the grounds that it seeks documents that are protected by the attorney-client privilege, work-product doctrine, or any other applicable privilege, immunity, or protection. Plaintiff further objects to this Request on the grounds that it seeks private or confidential documents. Plaintiff further objects to this Request on the grounds that it is duplicative of other discovery. Plaintiff further objects that the Request is unreasonably broad and vague and calls for a legal conclusion in that it seeks all documents "supporting, refuting, or otherwise related to" a statement. Plaintiff objects that Defendant has failed to describe reasonably identifiable categories of documents for production and instead has improperly attempted to shift the burden to Plaintiff to analyze what documents might be deemed to "support, refute, or otherwise relate" to a particular statement, which implicates the work

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

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

**RESPONSE:**

Plaintiff repeats and incorporates by this reference the General Objections and Objections to Definitions and Instruction above, as though set forth in full. Plaintiff further objects to this Request on the grounds that it seeks documents that are neither relevant nor reasonably calculated to lead to the discovery of admissible evidence. Plaintiff further objects to this Request on the grounds that it is overly broad and unduly burdensome taking into account the needs of the case, including because it seeks "all" documents and communications. Plaintiff further objects to this Request as harassing because it seeks information unrelated to the subject matter of this case. Plaintiff further objects to this Request on the grounds that it is lacking in reasonable particularity. Plaintiff further objects to this Request on the grounds that it seeks documents that are protected by the attorney-client privilege, work-product doctrine, or any other applicable privilege, immunity, or protection. Plaintiff further objects to this Request on the grounds that it seeks private or confidential documents. Plaintiff further objects to this Request on the grounds that it is duplicative of other discovery. Plaintiff further objects to this Request to the extent it calls for a legal conclusion. Plaintiff further objects that the Request is unreasonably broad and vague and calls for a legal conclusion in that it seeks all documents "supporting, refuting, or otherwise related to" a statement. Plaintiff objects that Defendant has failed to describe reasonably identifiable categories of documents for production and instead has improperly attempted to shift the burden to Plaintiff to analyze what documents might be deemed

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

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

**RESPONSE:**

Plaintiff repeats and incorporates by this reference the General Objections and Objections to Definitions and Instruction above, as though set forth in full. Plaintiff further objects to this Request on the grounds that it seeks documents that are neither relevant nor reasonably calculated to lead to the discovery of admissible evidence. Plaintiff further objects to this Request on the grounds that it is overly broad and unduly burdensome taking into account the needs of the case, including because it seeks “all” documents and communications. Plaintiff further objects to this Request as harassing because it seeks information unrelated to the subject matter of this case. Plaintiff further objects to this Request on the grounds that it is lacking in reasonable particularity. Plaintiff further objects to this Request on the grounds that it seeks documents that are protected by the attorney-client privilege, work-product doctrine, or any other applicable privilege, immunity, or protection. Plaintiff further objects to this Request on the grounds that it seeks private or confidential documents. Plaintiff further objects to this Request on the grounds that it is duplicative of other discovery. Plaintiff further objects that the Request is unreasonably broad and vague and calls for a legal conclusion in that it seeks all documents “supporting, refuting, or otherwise related to” a statement. Plaintiff objects that Defendant has

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

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

**RESPONSE:**

Plaintiff repeats and incorporates by this reference the General Objections and Objections to Definitions and Instruction above, as though set forth in full. Plaintiff further objects to this Request on the grounds that it seeks documents that are neither relevant nor reasonably calculated to lead to the discovery of admissible evidence. Plaintiff further objects to this Request on the grounds that it is overly broad and unduly burdensome taking into account the needs of the case, including because it seeks “all” documents and communications. Plaintiff further objects to this Request as harassing because it seeks information unrelated to the subject matter of this case. Plaintiff further objects to this Request on the grounds that it is lacking in reasonable particularity. Plaintiff further objects to this Request on the grounds that it seeks documents that are protected by the attorney-client privilege, work-product doctrine, or any other applicable privilege, immunity, or protection. Plaintiff further objects to this Request on the grounds that it seeks private or confidential documents. Plaintiff further objects to this Request



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

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

**RESPONSE:**

Plaintiff repeats and incorporates by this reference the General Objections and Objections to Definitions and Instruction above, as though set forth in full. Plaintiff further objects to this Request on the grounds that it seeks documents that are neither relevant nor reasonably calculated to lead to the discovery of admissible evidence. Plaintiff further objects to this Request on the grounds that it is overly broad and unduly burdensome taking into account the needs of the case, including because it seeks “all” documents and communications. Plaintiff further objects to this Request as harassing because it seeks information unrelated to the subject matter of this case. Plaintiff further objects to this Request on the grounds that it is lacking in reasonable particularity. Plaintiff further objects to this Request on the grounds that it seeks

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

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

**RESPONSE:**

Plaintiff repeats and incorporates by this reference the General Objections and Objections to Definitions and Instruction above, as though set forth in full. Plaintiff further objects to this Request on the grounds that it seeks documents that are neither relevant nor reasonably calculated to lead to the discovery of admissible evidence. Plaintiff further objects to this Request on the grounds that it is overly broad and unduly burdensome taking into account the needs of the case, including because it seeks “all” documents and communications. Plaintiff further objects to this Request as harassing because it seeks information unrelated to the subject

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

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

**RESPONSE:**

Plaintiff repeats and incorporates by this reference the General Objections and Objections to Definitions and Instruction above, as though set forth in full. Plaintiff further objects to this Request on the grounds that it seeks documents that are neither relevant nor reasonably calculated to lead to the discovery of admissible evidence. Plaintiff further objects to this

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

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

**RESPONSE:**

Plaintiff repeats and incorporates by this reference the General Objections and Objections to Definitions and Instruction above, as though set forth in full. Plaintiff further objects to this Request on the grounds that it seeks documents that are neither relevant nor reasonably calculated to lead to the discovery of admissible evidence. Plaintiff further objects to this Request on the grounds that it is overly broad and unduly burdensome taking into account the needs of the case, including because it seeks “all” documents and communications. Plaintiff further objects to this Request as harassing because it seeks information unrelated to the subject matter of this case. Plaintiff further objects to this Request on the grounds that it is lacking in reasonable particularity. Plaintiff further objects to this Request on the grounds that it seeks documents that are protected by the attorney-client privilege, work-product doctrine, or any other applicable privilege, immunity, or protection. Plaintiff further objects to this Request on the grounds that it seeks private or confidential documents. Plaintiff further objects to this Request on the grounds that it is duplicative of other discovery. Plaintiff further objects that the Request is unreasonably broad and vague in that it seeks all documents “supporting, refuting, or otherwise related to” a statement. Plaintiff objects that Defendant has failed to describe reasonably identifiable categories of documents for production and instead has improperly attempted to shift the burden to Plaintiff to analyze what documents might be deemed to “support, refute, or otherwise relate” to a particular statement, which implicates the work product of counsel. Plaintiff further objects to the Request as being unduly cumulative and harassing. Plaintiff further objects to this Request on the grounds that it openly seeks documents related to Mr. Waldman that are protected by the attorney-client privilege and work-product doctrine, and are not subject to discovery in this action. Defendant has articulated no valid basis to seek

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

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

**RESPONSE:**

Plaintiff repeats and incorporates by this reference the General Objections and Objections to Definitions and Instruction above, as though set forth in full. Plaintiff further objects to this Request on the grounds that it seeks documents that are neither relevant nor reasonably calculated to lead to the discovery of admissible evidence. Plaintiff further objects to this Request on the grounds that it is overly broad and unduly burdensome taking into account the needs of the case, including because it seeks “all” documents and communications. Plaintiff further objects to this Request as harassing because it seeks information unrelated to the subject matter of this case. Plaintiff further objects to this Request on the grounds that it is lacking in reasonable particularity. Plaintiff further objects to this Request on the grounds that it seeks documents that are protected by the attorney-client privilege, work-product doctrine, or any other applicable privilege, immunity, or protection. Plaintiff further objects to this Request on the grounds that it seeks private or confidential documents. Plaintiff further objects to this Request on the grounds that it is duplicative of other discovery. Plaintiff further objects that the Request is unreasonably broad and vague in that it seeks all documents “supporting, refuting, or otherwise related to” a statement. Plaintiff objects that Defendant has failed to describe reasonably identifiable categories of documents for production and instead has improperly attempted to shift the burden to Plaintiff to analyze what documents might be deemed to “support, refute, or otherwise relate” to a particular statement, which implicates the work product

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

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

**RESPONSE:**

Plaintiff repeats and incorporates by this reference the General Objections and Objections to Definitions and Instruction above, as though set forth in full. Plaintiff further objects to this Request on the grounds that it seeks documents that are neither relevant nor reasonably calculated to lead to the discovery of admissible evidence. Plaintiff further objects to this Request on the grounds that it is overly broad and unduly burdensome taking into account the needs of the case, including because it seeks “all” documents and communications. Plaintiff further objects to this Request as harassing because it seeks information unrelated to the subject matter of this case. Plaintiff further objects to this Request on the grounds that it is lacking in reasonable particularity. Plaintiff further objects to this Request on the grounds that it seeks documents that are protected by the attorney-client privilege, work-product doctrine, or any other applicable privilege, immunity, or protection. Plaintiff further objects to this Request on the grounds that it seeks private or confidential documents. Plaintiff further objects to this Request on the grounds that it is duplicative of other discovery. Plaintiff further objects that the Request is unreasonably broad and vague in that it seeks all documents “supporting, refuting, or

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

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

**RESPONSE:**

Plaintiff repeats and incorporates by this reference the General Objections and Objections to Definitions and Instruction above, as though set forth in full. Plaintiff further objects to this Request on the grounds that it seeks documents that are neither relevant nor reasonably calculated to lead to the discovery of admissible evidence. Plaintiff further objects to this Request on the grounds that it is overly broad and unduly burdensome taking into account the needs of the case, including because it seeks “all” documents and communications. Plaintiff further objects to this Request as harassing because it seeks information unrelated to the subject matter of this case. Plaintiff further objects to this Request on the grounds that it is lacking in reasonable particularity. Plaintiff further objects to this Request on the grounds that it seeks documents that are protected by the attorney-client privilege, work-product doctrine, or any other



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

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

**RESPONSE:**

Plaintiff repeats and incorporates by this reference the General Objections and Objections to Definitions and Instruction above, as though set forth in full. Plaintiff further objects to this Request on the grounds that it seeks documents that are neither relevant nor reasonably calculated to lead to the discovery of admissible evidence. Plaintiff further objects to this Request on the grounds that it is overly broad and unduly burdensome taking into account the needs of the case, including because it seeks “all” documents and communications. Plaintiff

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

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

**RESPONSE:**

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

Request on the grounds that it seeks documents that are neither relevant nor reasonably calculated to lead to the discovery of admissible evidence. Plaintiff further objects to this Request on the grounds that it is overly broad and unduly burdensome taking into account the needs of the case, including because it seeks “all” documents and communications. Plaintiff further objects to this Request as harassing because it seeks information unrelated to the subject matter of this case. Plaintiff further objects to this Request on the grounds that it is lacking in reasonable particularity. Plaintiff further objects to this Request on the grounds that it seeks documents that are protected by the attorney-client privilege, work-product doctrine, or any other applicable privilege, immunity, or protection. Plaintiff further objects to this Request on the grounds that it seeks private or confidential documents. Plaintiff further objects to this Request on the grounds that it is duplicative of other discovery. Plaintiff further objects that the Request is unreasonably broad and vague in that it seeks all documents “supporting, refuting, or otherwise related to” a statement. Plaintiff objects that Defendant has failed to describe reasonably identifiable categories of documents for production and instead has improperly attempted to shift the burden to Plaintiff to analyze what documents might be deemed to “support, refute, or otherwise relate” to a particular statement, which implicates the work product of counsel. Plaintiff further objects to the Request as being unduly cumulative and harassing. Plaintiff further objects to this Request on the grounds that it openly seeks documents related to Mr. Waldman that are protected by the attorney-client privilege and work-product doctrine, and are not subject to discovery in this action. Defendant has articulated no valid basis to seek privileged materials. Plaintiff further objects that the Request is vague, ambiguous, and unintelligible.

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

**RESPONSE:**

Plaintiff repeats and incorporates by this reference the General Objections and Objections to Definitions and Instruction above, as though set forth in full. Plaintiff further objects to this Request on the grounds that it seeks documents that are neither relevant nor reasonably calculated to lead to the discovery of admissible evidence. Plaintiff further objects to this Request on the grounds that it is overly broad and unduly burdensome taking into account the needs of the case, including because it seeks “all” documents and communications. Plaintiff further objects to this Request as harassing because it seeks information unrelated to the subject matter of this case. Plaintiff further objects to this Request on the grounds that it is lacking in reasonable particularity. Plaintiff further objects to this Request on the grounds that it seeks documents that are protected by the attorney-client privilege, work-product doctrine, or any other applicable privilege, immunity, or protection. Plaintiff further objects to this Request on the grounds that it seeks private or confidential documents. Plaintiff further objects to this Request on the grounds that it is duplicative of other discovery. Plaintiff further objects that the Request is unreasonably broad and vague in that it seeks all documents “supporting, refuting, or otherwise related to” a statement. Plaintiff objects that Defendant has failed to describe reasonably identifiable categories of documents for production and instead has improperly attempted to shift the burden to Plaintiff to analyze what documents might be deemed to “support, refute, or otherwise relate” to a particular statement, which implicates the work product of counsel. Plaintiff further objects to the Request as being unduly cumulative and harassing. Plaintiff further objects to this Request on the grounds that it openly seeks documents related to

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

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

**RESPONSE:**

Plaintiff repeats and incorporates by this reference the General Objections and Objections to Definitions and Instruction above, as though set forth in full. Plaintiff further objects to this Request on the grounds that it seeks documents that are neither relevant nor reasonably calculated to lead to the discovery of admissible evidence. Plaintiff further objects to this Request on the grounds that it is overly broad and unduly burdensome taking into account the needs of the case, including because it seeks “all” documents and communications. Plaintiff further objects to this Request as harassing because it seeks information unrelated to the subject matter of this case. Plaintiff further objects to this Request on the grounds that it is lacking in reasonable particularity. Plaintiff further objects to this Request on the grounds that it seeks documents that are protected by the attorney-client privilege, work-product doctrine, or any other applicable privilege, immunity, or protection. Plaintiff further objects to this Request on the grounds that it seeks private or confidential documents. Plaintiff further objects to this Request on the grounds that it is duplicative of other discovery. Plaintiff further objects that the Request is unreasonably broad and vague in that it seeks all documents “supporting, refuting, or otherwise related to” a statement. Plaintiff objects that Defendant has failed to describe reasonably identifiable categories of documents for production and instead has improperly

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

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

**RESPONSE:**

Plaintiff repeats and incorporates by this reference the General Objections and Objections to Definitions and Instruction above, as though set forth in full. Plaintiff further objects to this Request on the grounds that it seeks documents that are neither relevant nor reasonably calculated to lead to the discovery of admissible evidence. Plaintiff further objects to this Request on the grounds that it is overly broad and unduly burdensome taking into account the needs of the case, including because it seeks “all” documents and communications. Plaintiff further objects to this Request as harassing because it seeks information unrelated to the subject matter of this case. Plaintiff further objects to this Request on the grounds that it is lacking in reasonable particularity. Plaintiff further objects to this Request on the grounds that it seeks documents that are protected by the attorney-client privilege, work-product doctrine, or any other applicable privilege, immunity, or protection. Plaintiff further objects to this Request on the grounds that it seeks private or confidential documents. Plaintiff further objects to this Request

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

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

**RESPONSE:**

Plaintiff repeats and incorporates by this reference the General Objections and Objections to Definitions and Instruction above, as though set forth in full. Plaintiff further objects to this Request on the grounds that it seeks documents that are neither relevant nor reasonably calculated to lead to the discovery of admissible evidence. Plaintiff further objects to this Request on the grounds that it is overly broad and unduly burdensome taking into account the needs of the case, including because it seeks “all” documents and communications. Plaintiff further objects to this Request as harassing because it seeks information unrelated to the subject matter of this case. Plaintiff further objects to this Request on the grounds that it is lacking in

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

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

**RESPONSE:**

Plaintiff repeats and incorporates by this reference the General Objections and Objections to Definitions and Instruction above, as though set forth in full. Plaintiff further objects to this Request on the grounds that it seeks documents that are neither relevant nor reasonably calculated to lead to the discovery of admissible evidence. Plaintiff further objects to this



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

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

**RESPONSE:**

Plaintiff repeats and incorporates by this reference the General Objections and Objections to Definitions and Instruction above, as though set forth in full. Plaintiff further objects to this Request on the grounds that it seeks documents that are neither relevant nor reasonably calculated to lead to the discovery of admissible evidence. Plaintiff further objects to this Request on the grounds that it is overly broad and unduly burdensome taking into account the needs of the case, including because it seeks “all” documents and communications. Plaintiff further objects to this Request as harassing because it seeks information unrelated to the subject matter of this case. Plaintiff further objects to this Request on the grounds that it is lacking in reasonable particularity. Plaintiff further objects to this Request on the grounds that it seeks documents that are protected by the attorney-client privilege, work-product doctrine, or any other applicable privilege, immunity, or protection. Plaintiff further objects to this Request on the grounds that it seeks private or confidential documents. Plaintiff further objects to this Request on the grounds that it is duplicative of other discovery. Plaintiff further objects to this Request to the extent it calls for a legal conclusion. Plaintiff further objects that the Request is unreasonably broad and vague in that it seeks all documents “supporting, refuting, or otherwise related to” a statement. Plaintiff objects that Defendant has failed to describe reasonably identifiable categories of documents for production and instead has improperly attempted to shift the burden to Plaintiff to analyze what documents might be deemed to “support, refute, or otherwise relate” to a particular statement, which implicates the work product of counsel. Plaintiff further objects to the Request as being unduly cumulative and harassing. Plaintiff further objects to this Request on the grounds that it openly seeks documents related to Mr. Waldman that are protected by the attorney-client privilege and work-product doctrine, and are not subject to discovery in this

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

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

**RESPONSE:**

Plaintiff repeats and incorporates by this reference the General Objections and Objections to Definitions and Instruction above, as though set forth in full. Plaintiff further objects to this Request on the grounds that it seeks documents that are neither relevant nor reasonably calculated to lead to the discovery of admissible evidence. Plaintiff further objects to this Request on the grounds that it is overly broad and unduly burdensome taking into account the needs of the case, including because it seeks “all” documents and communications. Plaintiff further objects to this Request as harassing because it seeks information unrelated to the subject matter of this case. Plaintiff further objects to this Request on the grounds that it is lacking in reasonable particularity. Plaintiff further objects to this Request on the grounds that it seeks documents that are protected by the attorney-client privilege, work-product doctrine, or any other applicable privilege, immunity, or protection. Plaintiff further objects to this Request on the grounds that it seeks private or confidential documents. Plaintiff further objects to this Request on the grounds that it is duplicative of other discovery. Plaintiff further objects to this Request to the extent it calls for a legal conclusion. Plaintiff further objects that the Request is unreasonably broad and vague in that it seeks all documents “supporting, refuting, or otherwise related to” a statement. Plaintiff objects that Defendant has failed to describe reasonably identifiable categories of documents for production and instead has improperly attempted to shift the burden to Plaintiff to analyze what documents might be deemed to “support, refute, or otherwise relate”

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

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

**RESPONSE:**

Plaintiff repeats and incorporates by this reference the General Objections and Objections to Definitions and Instruction above, as though set forth in full. Plaintiff further objects to this Request on the grounds that it seeks documents that are neither relevant nor reasonably calculated to lead to the discovery of admissible evidence. Plaintiff further objects to this Request on the grounds that it is overly broad and unduly burdensome taking into account the needs of the case, including because it seeks “all” documents and communications. Plaintiff further objects to this Request as harassing because it seeks information unrelated to the subject matter of this case. Plaintiff further objects to this Request on the grounds that it is lacking in reasonable particularity. Plaintiff further objects to this Request on the grounds that it seeks documents that are protected by the attorney-client privilege, work-product doctrine, or any other applicable privilege, immunity, or protection. Plaintiff further objects to this Request on the grounds that it seeks private or confidential documents. Plaintiff further objects to this Request on the grounds that it is duplicative of other discovery. Plaintiff further objects to this Request to the extent it calls for a legal conclusion. Plaintiff further objects that the Request is unreasonably

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

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

**RESPONSE:**

Plaintiff repeats and incorporates by this reference the General Objections and Objections to Definitions and Instruction above, as though set forth in full. Plaintiff further objects to this Request on the grounds that it seeks documents that are neither relevant nor reasonably calculated to lead to the discovery of admissible evidence. Plaintiff further objects to this Request on the grounds that it is overly broad and unduly burdensome taking into account the needs of the case, including because it seeks “all” documents and communications. Plaintiff further objects to this Request as harassing because it seeks information unrelated to the subject matter of this case. Plaintiff further objects to this Request on the grounds that it is lacking in reasonable particularity. Plaintiff further objects to this Request on the grounds that it seeks documents that are protected by the attorney-client privilege, work-product doctrine, or any other

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

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

**RESPONSE:**

Plaintiff repeats and incorporates by this reference the General Objections and Objections to Definitions and Instruction above, as though set forth in full. Plaintiff further objects to this Request on the grounds that it seeks documents that are neither relevant nor reasonably calculated to lead to the discovery of admissible evidence. Plaintiff further objects to this Request on the grounds that it is overly broad and unduly burdensome taking into account the needs of the case, including because it seeks “all” documents and communications. Plaintiff

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

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

**RESPONSE:**

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

Request on the grounds that it seeks documents that are neither relevant nor reasonably calculated to lead to the discovery of admissible evidence. Plaintiff further objects to this Request on the grounds that it is overly broad and unduly burdensome taking into account the needs of the case, including because it seeks “all” documents and communications. Plaintiff further objects to this Request as harassing because it seeks information unrelated to the subject matter of this case. Plaintiff further objects to this Request on the grounds that it is lacking in reasonable particularity. Plaintiff further objects to this Request on the grounds that it seeks documents that are protected by the attorney-client privilege, work-product doctrine, or any other applicable privilege, immunity, or protection. Plaintiff further objects to this Request on the grounds that it seeks private or confidential documents. Plaintiff further objects to this Request on the grounds that it is duplicative of other discovery. Plaintiff further objects to this Request to the extent it calls for a legal conclusion. Plaintiff further objects that the Request is unreasonably broad and vague in that it seeks all documents “supporting, refuting, or otherwise related to” a statement. Plaintiff objects that Defendant has failed to describe reasonably identifiable categories of documents for production and instead has improperly attempted to shift the burden to Plaintiff to analyze what documents might be deemed to “support, refute, or otherwise relate” a particular statement, which implicates the work product of counsel. Plaintiff further objects to the Request as being unduly cumulative and harassing. Plaintiff further objects to this Request on the grounds that it openly seeks documents related to Mr. Waldman that are protected by the attorney-client privilege and work-product doctrine, and are not subject to discovery in this action. Defendant has articulated no valid basis to seek privileged materials. Plaintiff further objects that the Request is vague, ambiguous, and unintelligible.



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

**RESPONSE:**

Plaintiff repeats and incorporates by this reference the General Objections and Objections to Definitions and Instruction above, as though set forth in full. Plaintiff further objects to this Request on the grounds that it seeks documents that are neither relevant nor reasonably calculated to lead to the discovery of admissible evidence. Plaintiff further objects to this Request on the grounds that it is overly broad and unduly burdensome taking into account the needs of the case, including because it seeks “all” documents and communications. Plaintiff further objects to this Request as harassing because it seeks information unrelated to the subject matter of this case. Plaintiff further objects to this Request on the grounds that it is lacking in reasonable particularity. Plaintiff further objects to this Request on the grounds that it seeks documents that are protected by the attorney-client privilege, work-product doctrine, or any other applicable privilege, immunity, or protection. Plaintiff further objects to this Request on the grounds that it seeks private or confidential documents. Plaintiff further objects to this Request on the grounds that it is duplicative of other discovery. Plaintiff further objects to this Request to the extent it calls for a legal conclusion. Plaintiff further objects that the Request is unreasonably broad and vague in that it seeks all documents “supporting, refuting, or otherwise related to” a statement. Plaintiff objects that Defendant has failed to describe reasonably identifiable categories of documents for production and instead has improperly attempted to shift the burden to Plaintiff to analyze what documents might be deemed to “support, refute, or otherwise relate” to a particular statement, which implicates the work product of counsel. Plaintiff further objects to the Request as being unduly cumulative and harassing. Plaintiff further objects to this Request

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

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

**RESPONSE:**

Plaintiff repeats and incorporates by this reference the General Objections and Objections to Definitions and Instruction above, as though set forth in full. Plaintiff further objects to this Request on the grounds that it seeks documents that are neither relevant nor reasonably calculated to lead to the discovery of admissible evidence. Plaintiff further objects to this Request on the grounds that it is overly broad and unduly burdensome taking into account the needs of the case, including because it seeks “all” documents and communications. Plaintiff further objects to this Request as harassing because it seeks information unrelated to the subject matter of this case. Plaintiff further objects to this Request on the grounds that it is lacking in reasonable particularity. Plaintiff further objects to this Request on the grounds that it seeks documents that are protected by the attorney-client privilege, work-product doctrine, or any other applicable privilege, immunity, or protection. Plaintiff further objects to this Request on the grounds that it seeks private or confidential documents. Plaintiff further objects to this Request on the grounds that it is duplicative of other discovery. Plaintiff further objects to this Request to the extent it calls for a legal conclusion. Plaintiff further objects that the Request is unreasonably broad and vague in that it seeks all documents “supporting, refuting, or otherwise related to” a statement. Plaintiff objects that Defendant has failed to describe reasonably identifiable

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

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

**RESPONSE:**

Plaintiff repeats and incorporates by this reference the General Objections and Objections to Definitions and Instruction above, as though set forth in full. Plaintiff further objects to this Request on the grounds that it seeks documents that are neither relevant nor reasonably calculated to lead to the discovery of admissible evidence. Plaintiff further objects to this Request on the grounds that it is overly broad and unduly burdensome taking into account the needs of the case. Plaintiff further objects to this Request as harassing because it seeks information unrelated to the subject matter of this case, especially in light of the Court’s denial of Ms. Heard’s motion to compel Mr. Depp’s devices for forensic imaging. November 8, 2021 Order, ¶ 1. Plaintiff further objects to this Request on the grounds that it is lacking in reasonable particularity. Plaintiff further objects to this Request to the extent that it could be construed to seek documents that are protected by the attorney-client privilege, work-product doctrine, or any other applicable privilege, immunity, or protection. Plaintiff further objects to this Request to the extent that it could be construed to demand an imaging of any device in his possession,

custody, or control, which has already been denied by the Court and is not appropriate or warranted under the circumstances of this case. Plaintiff further objects to this Request on the grounds that it seeks private or confidential documents. Plaintiff further objects to this Request on the grounds that it is duplicative of other discovery. Plaintiff further objects that the term “Mr. Depp’s Devices” is inappropriate and overbroad, because, among other reasons, it has been defined to include devices belonging to third parties to this litigation. Plaintiff further objects to the Request on the grounds that it implicates rights of medical privacy, the patient-physician privilege, and HIPAA. Plaintiff further objects that the Request is unreasonably cumulative and duplicative of other discovery. Plaintiff further objects that the Request is unreasonably overbroad, including because of its open-ended demand for any photograph of Mr. Depp’s “hands” or fingers,” apart from pictures reflecting an injury.

Subject to and without waiving the foregoing objections, Plaintiff responds as follows: Plaintiff will produce (and is believed to have already produced) all photographs of Mr. Depp’s finger injury or severed finger during the time period of March 1-19, 2015. Further, Plaintiff is not aware of any deleted photographs of Mr. Depp’s fingers, finger injury, or severed finger on Mr. Depp’s Devices during the time period of March 1-19, 2015 and the Court has denied Ms. Heard’s request to forensically image Mr. Depp’s devices.

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

**RESPONSE:**

Plaintiff repeats and incorporates by this reference the General Objections and Objections to Definitions and Instruction above, as though set forth in full. Plaintiff further objects to this Request on the grounds that it seeks documents that are neither relevant nor reasonably calculated to lead to the discovery of admissible evidence. Plaintiff further objects to this

Request on the grounds that it is overly broad and unduly burdensome taking into account the needs of the case. Plaintiff further objects to this Request as harassing because it seeks information unrelated to the subject matter of this case, especially in light of the Court's denial of Ms. Heard's motion to compel Mr. Depp's devices for forensic imaging. November 8, 2021 Order, ¶ 1. Plaintiff further objects to this Request on the grounds that it is lacking in reasonable particularity. Plaintiff further objects to this Request to the extent that it could be construed to seek documents that are protected by the attorney-client privilege, work-product doctrine, or any other applicable privilege, immunity, or protection. Plaintiff further objects to this Request to the extent that it could be construed to demand an imaging of any device in his possession, custody, or control, which has already been denied by the Court and is not appropriate or warranted under the circumstances of this case. Plaintiff further objects to this Request on the grounds that it seeks private or confidential documents. Plaintiff further objects to this Request on the grounds that it is duplicative of other discovery. Plaintiff further objects that the term "Mr. Depp's Devices" is inappropriate and overbroad, because, among other reasons, it has been defined to include devices belonging to third parties to this litigation. Plaintiff further objects to the Request on the grounds that it implicates rights of medical privacy, the patient-physician privilege, and HIPAA. Plaintiff further objects that the Request is unreasonably cumulative and duplicative of other discovery. Plaintiff further objects that the request is unreasonably overbroad, including because of its open-ended demand for any recording of Mr. Depp's "hands" or "fingers," apart from recordings reflecting an injury.

Subject to and without waiving the foregoing objections, Plaintiff responds as follows: Plaintiff will produce (and is believed to have already produced) all video recordings of Mr. Depp's finger injury during the time period of March 1-19, 2015. Further, Plaintiff is not aware

of any deleted video recordings of Mr. Depp's fingers, finger injury, or severed finger on Mr. Depp's Devices during the time period of March 1-19, 2015 and the Court has denied Ms. Heard's request to forensically image Mr. Depp's devices.

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

**RESPONSE:**

Plaintiff repeats and incorporates by this reference the General Objections and Objections to Definitions and Instruction above, as though set forth in full. Plaintiff further objects to this Request on the grounds that it seeks documents that are neither relevant nor reasonably calculated to lead to the discovery of admissible evidence. Plaintiff further objects to this Request on the grounds that it is overly broad and unduly burdensome taking into account the needs of the case. Plaintiff further objects to this Request as harassing because it seeks information unrelated to the subject matter of this case, especially in light of the Court's denial of Ms. Heard's motion to compel Mr. Depp's devices for forensic imaging. November 8, 2021 Order, ¶ 1. Plaintiff further objects to this Request on the grounds that it is lacking in reasonable particularity. Plaintiff further objects to this Request to the extent that it could be construed to seek documents that are protected by the attorney-client privilege, work-product doctrine, or any other applicable privilege, immunity, or protection. Plaintiff further objects to this Request to the extent that it could be construed to demand an imaging of any device in his possession, custody, or control, which has already been denied by the Court and is not appropriate or warranted under the circumstances of this case. Plaintiff further objects to this Request on the grounds that it seeks private or confidential documents. Plaintiff further objects to this Request on the grounds that it is duplicative of other discovery. Plaintiff further objects that the term "Mr. Depp's Devices" is inappropriate and overbroad, because, among other reasons, it has been

defined to include devices belonging to third parties to this litigation. Plaintiff further objects to this Request on the grounds that the very nature of this Request is vague, ambiguous, unintelligible, and overbroad, including because it seeks “audio recordings of Mr. Depp’s fingers, finger injury, severed finger, or hands.”

31. Please produce Mr. Depp’s Devices for purposes of forensic imaging by Mr. Depp’s Forensic Experts (under the supervision of Ms. Heard’s 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’s fingers, finger injury, severed finger, or hands between March 1-19, 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 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). Plaintiff further objects that this Request is duplicative of numerous other discovery requests, and appears calculated to harass.

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

**RESPONSE:**

Plaintiff repeats and incorporates by this reference the General Objections and Objections to Definitions and Instruction above, as though set forth in full. Plaintiff further objects to this Request on the grounds that it seeks documents that are neither relevant nor reasonably calculated to lead to the discovery of admissible evidence. Plaintiff further objects to this Request on the grounds that it is overly broad and unduly burdensome taking into account the needs of the case. Plaintiff further objects to this Request as harassing because it seeks information unrelated to the subject matter of this case, especially in light of the Court’s denial of Ms. Heard’s motion to compel Mr. Depp’s devices for forensic imaging. November 8, 2021 Order, ¶ 1. Plaintiff further objects to this Request on the grounds that it is lacking in reasonable



particularity. Plaintiff further objects to this Request on the grounds that it seeks documents that are protected by the attorney-client privilege, work-product doctrine, or any other applicable privilege, immunity, or protection. Plaintiff further objects to this Request to the extent that it could be construed to demand an imaging of any device in his possession, custody, or control, which has already been denied by the Court and is not appropriate or warranted under the circumstances of this case. Plaintiff further objects to this Request on the grounds that it seeks private or confidential documents. Plaintiff further objects to this Request on the grounds that it is duplicative of other discovery. Plaintiff further objects that the term “Mr. Depp’s Devices” is inappropriate and overbroad, because, among other reasons, it has been defined to include devices belonging to third parties to this litigation. Plaintiff further objects to this Request on the grounds that it is unreasonably overbroad and harassing.

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

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

**RESPONSE:**

Plaintiff repeats and incorporates by this reference the General Objections and Objections to Definitions and Instruction above, as though set forth in full. Plaintiff further objects to this Request on the grounds that it seeks documents that are neither relevant nor reasonably calculated to lead to the discovery of admissible evidence. Plaintiff further objects to this Request on the grounds that it is overly broad and unduly burdensome taking into account the needs of the case. Plaintiff further objects to this Request as harassing because it seeks information unrelated to the subject matter of this case, especially in light of the Court’s denial

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 the Request is overbroad, duplicative, and appears calculated to harass.

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

**RESPONSE:**

Plaintiff repeats and incorporates by this reference the General Objections and Objections to Definitions and Instruction above, as though set forth in full. Plaintiff further objects to this Request on the grounds that it seeks documents that are neither relevant nor reasonably calculated to lead to the discovery of admissible evidence. Plaintiff further objects to this Request on the grounds that it is overly broad and unduly burdensome taking into account the needs of the case. Plaintiff further objects to this Request as harassing because it seeks information unrelated to the subject matter of this case, especially in light of the Court's denial 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 the Request is overbroad, duplicative, and appears calculated to harass.

35. Please produce all audio recordings and deleted audio recordings of Mr. Depp on Mr. Depp’s Devices between February 17-March 19, 2015, in native form with all metadata.

**RESPONSE:**

Plaintiff repeats and incorporates by this reference the General Objections and Objections to Definitions and Instruction above, as though set forth in full. Plaintiff further objects to this Request on the grounds that it seeks documents that are neither relevant nor reasonably calculated to lead to the discovery of admissible evidence. Plaintiff further objects to this Request on the grounds that it is overly broad and unduly burdensome taking into account the needs of the case. Plaintiff further objects to this Request as harassing because it seeks information unrelated to the subject matter of this case, especially in light of the Court’s denial 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 the Request is overbroad, duplicative, and appears calculated to harass.

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 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 between February 17-March 19, 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 to the extent that it could be construed to seek documents that are protected by the attorney-client privilege, work-product doctrine, or any other applicable privilege, immunity, or protection. Plaintiff further objects to this Request on the grounds that it demands an imaging of any device in his possession, custody, or control, which has already been denied by the Court and is not appropriate or warranted under the circumstances of this case. Plaintiff further objects to this Request on the grounds that it seeks private or confidential documents. Plaintiff further objects to this Request on the grounds that it is duplicative of other discovery. Plaintiff further objects that the term “Mr. Depp’s Devices” is inappropriate and overbroad, because, among other reasons, it has been defined to include devices belonging to third parties to this litigation. Plaintiff further objects that this Request is duplicative of discovery that has already been denied by the Court. Plaintiff further objects that this Request seeks to impose burdens beyond those imposed under applicable law, and no legitimate basis has been shown to seek a forensic imaging of Mr. Depp’s devices. Plaintiff further objects that this Request is duplicative of discovery that has already been denied by the Court. Plaintiff will not produce his original devices for forensic imaging. This request was squarely before the Court and the Court denied Ms. Heard’s request, stating: “as far as mutuality goes, because it’s ordered in one case for one side, I’m -- I’m going to deny that request at this time. There still has to be a *nexus* shown when -- when you’re asking for those types of items in discovery.” November 8, 2021 Order at 68:13-18 (emphasis added). Plaintiff further objects that the Request is overbroad, duplicative, and appears calculated to harass.

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

**RESPONSE:**

Plaintiff repeats and incorporates by this reference the General Objections and Objections to Definitions and Instruction above, as though set forth in full. Plaintiff further objects to this Request on the grounds that it seeks documents that are neither relevant nor reasonably calculated to lead to the discovery of admissible evidence. Plaintiff further objects to this Request on the grounds that it is overly broad and unduly burdensome taking into account the needs of the case. Plaintiff further objects to this Request as harassing because it seeks information unrelated to the subject matter of this case. Plaintiff further objects to this Request on the grounds that it is lacking in reasonable particularity. Plaintiff further objects to this Request on the grounds that it seeks documents that are protected by the attorney-client privilege, work-product doctrine, or any other applicable privilege, immunity, or protection. Plaintiff further objects to this Request on the grounds that it seeks private or confidential documents. Plaintiff further objects to this Request on the grounds that it is duplicative of other discovery. Plaintiff further objects to this Request on the grounds that it seeks documents that are subject to Protective Order; subject to confidentiality agreement(s); subject to the mediation privilege; subject to the settlement communication privilege; or are otherwise protected from disclosure. Plaintiff further objects to this Request on the grounds that it is patently overbroad and appears calculated to harass.

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

**RESPONSE:**

Plaintiff repeats and incorporates by this reference the General Objections and Objections to Definitions and Instruction above, as though set forth in full. Plaintiff further objects to this Request on the grounds that it seeks documents that are neither relevant nor reasonably

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

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

**RESPONSE:**

Plaintiff repeats and incorporates by this reference the General Objections and Objections to Definitions and Instruction above, as though set forth in full. Plaintiff further objects to this Request on the grounds that it seeks documents that are neither relevant nor reasonably calculated to lead to the discovery of admissible evidence. Plaintiff further objects to this Request on the grounds that it is overly broad and unduly burdensome taking into account the

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

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

**RESPONSE:**

Plaintiff repeats and incorporates by this reference the General Objections and Objections to Definitions and Instruction above, as though set forth in full. Plaintiff further objects to this Request on the grounds that it seeks documents that are neither relevant nor reasonably calculated to lead to the discovery of admissible evidence. Plaintiff further objects to this Request on the grounds that it is overly broad and unduly burdensome taking into account the



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

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

**RESPONSE:**

Plaintiff repeats and incorporates by this reference the General Objections and Objections to Definitions and Instruction above, as though set forth in full. Plaintiff further objects to this Request on the grounds that it seeks documents that are neither relevant nor reasonably calculated to lead to the discovery of admissible evidence. Plaintiff further objects to this Request on the grounds that it is overly broad and unduly burdensome taking into account the

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

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

**RESPONSE:**

Plaintiff repeats and incorporates by this reference the General Objections and Objections to Definitions and Instruction above, as though set forth in full. Plaintiff further objects to this Request on the grounds that it seeks documents that are neither relevant nor reasonably calculated to lead to the discovery of admissible evidence. Plaintiff further objects to this Request on the grounds that it is overly broad and unduly burdensome taking into account the needs of the case. Plaintiff further objects to this Request as harassing because it seeks information unrelated to the subject matter of this case. Plaintiff further objects to this Request on the grounds that it is lacking in reasonable particularity. Plaintiff further objects to this

Request on the grounds that it seeks documents that are protected by the attorney-client privilege, work-product doctrine, or any other applicable privilege, immunity, or protection. Plaintiff further objects to this Request on the grounds that it seeks private or confidential documents. Plaintiff further objects to this Request on the grounds that it is duplicative of other discovery. Plaintiff further objects to this Request to the extent it seeks documents not within his possession, custody, or control. Plaintiff further objects to this Request on the grounds that the very nature of this Request is vague, ambiguous, unintelligible, and overbroad, including because it seeks documents relating to “*possible* instances of physical violence by Mr. Depp toward any person or property.” Plaintiff further objects on the grounds that the Request completely fails to set forth any category of documents with reasonable particularity. Plaintiff further objects on the grounds that the Request seeks documents with no legitimate nexus to this action and appears calculated to harass. Plaintiff further objects to the Request on the grounds that it assumes facts not in evidence and lacks foundation for the same.

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

**RESPONSE:**

Plaintiff repeats and incorporates by this reference the General Objections and Objections to Definitions and Instruction above, as though set forth in full. Plaintiff further objects to this Request on the grounds that it seeks documents that are neither relevant nor reasonably calculated to lead to the discovery of admissible evidence. Plaintiff further objects to this Request on the grounds that it is overly broad and unduly burdensome taking into account the needs of the case. Plaintiff further objects to this Request as harassing because it seeks information unrelated to the subject matter of this case. Plaintiff further objects to this Request on the grounds that it is lacking in reasonable particularity. Plaintiff further objects to this

Request on the grounds that it seeks documents that are protected by the attorney-client privilege, work-product doctrine, or any other applicable privilege, immunity, or protection. Plaintiff further objects to this Request on the grounds that it seeks private or confidential documents. Plaintiff further objects to this Request on the grounds that it is duplicative of other discovery. Plaintiff further objects to this Request to the extent it seeks documents not within his possession, custody, or control. Plaintiff further objects to this Request as vague, ambiguous, and overbroad, including because it seeks “all” documents relating to “complaints and/or criticisms against or about Mr. Depp *by any person of any nature* from January 1, 2009 until the present,” a twelve-year time period. Plaintiff further objects on the grounds that the Request completely fails to set forth any category of documents with reasonable particularity. Plaintiff further objects on the grounds that the Request seeks documents with no legitimate nexus to this action and appears calculated to harass. Plaintiff further objects to the Request on the grounds that it assumes facts not in evidence and lacks foundation for the same.

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

**RESPONSE:**

Plaintiff repeats and incorporates by this reference the General Objections and Objections to Definitions and Instruction above, as though set forth in full. Plaintiff further objects to this Request on the grounds that it seeks documents that are neither relevant nor reasonably calculated to lead to the discovery of admissible evidence. Plaintiff further objects to this Request on the grounds that it is overly broad and unduly burdensome taking into account the needs of the case. Plaintiff further objects to this Request as harassing because it seeks information unrelated to the subject matter of this case. Plaintiff further objects to this Request on the grounds that it is lacking in reasonable particularity. Plaintiff further objects to this

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

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

**RESPONSE:**

Plaintiff repeats and incorporates by this reference the General Objections and Objections to Definitions and Instruction above, as though set forth in full. Plaintiff further objects to this Request on the grounds that it seeks documents that are neither relevant nor reasonably calculated to lead to the discovery of admissible evidence. Plaintiff further objects to this Request on the grounds that it is overly broad and unduly burdensome taking into account the

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

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

**RESPONSE:**

Plaintiff repeats and incorporates by this reference the General Objections and Objections to Definitions and Instruction above, as though set forth in full. Plaintiff further objects to this Request on the grounds that it seeks documents that are neither relevant nor reasonably

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

Dated: December 10, 2021

Respectfully submitted,



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

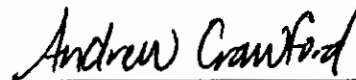


**CERTIFICATE OF SERVICE**

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

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Andrew C. Crawford (VSB #89093)