

VIRGINIA:

IN THE CIRCUIT COURT OF FAIRFAX COUNTY, VIRGINIA

JOHN C. DEPP, II

*Plaintiff and Counterclaim
Defendant,*

v.

AMBER LAURA HEARD,

*Defendant and
Counterclaim Plaintiff.*

Civil Action No.: CL-2019-0002911

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

Pursuant to Rule 4:9 of the Rules of the Supreme Court of Virginia, Plaintiff and Counterclaim Defendant John C. Depp, II ("Plaintiff" and/or "Mr. Depp"), by and through his undersigned counsel, hereby responds and objects to Defendant and Counterclaim Plaintiff Amber Laura Heard's ("Defendant" and/or "Ms. Heard") Seventeenth Set of Requests for Production of Documents (each, a "Request" and collectively, the "Requests"), dated November 29, 2021 and served in the above captioned action ("Action") as follows:

GENERAL OBJECTIONS

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

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

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

RESPONSE:

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

documents that are neither relevant nor reasonably calculated to lead to the discovery of admissible evidence. Plaintiff further objects to this Request on the grounds that it is overly broad and unduly burdensome taking into account the needs of the case, including because it seeks “all” documents. Plaintiff further objects to this Request on the grounds that it is lacking in reasonable particularity. Plaintiff further objects to this Request on the grounds that it seeks documents that are protected by the attorney-client privilege, work-product doctrine, or any other applicable privilege, immunity, or protection. Plaintiff further objects to this Request on the grounds that it seeks private or confidential documents. Plaintiff further objects to this Request on the grounds that it is duplicative of other discovery. Plaintiff further objects that the Request is unreasonably broad and vague and calls for a legal conclusion in that it seeks all documents “supporting, refuting, or otherwise relating to” a statement. Plaintiff objects that Defendant has failed to describe reasonably identifiable categories of documents for production and instead has improperly attempted to shift the burden to Plaintiff to analyze what documents might be deemed to “support[], refut[e], or otherwise relat[e]” to a particular statement, which implicates the work product of counsel. Plaintiff further objects to the Request as being unduly cumulative and harassing.

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

RESPONSE:

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

discovery process. Plaintiff further objects to this Request on the grounds that it seeks documents that are neither relevant nor reasonably calculated to lead to the discovery of admissible evidence. Plaintiff further objects to this Request on the grounds that it is overly broad and unduly burdensome taking into account the needs of the case, including because it seeks “all” documents. Plaintiff further objects to this Request on the grounds that it is lacking in reasonable particularity. Plaintiff further objects to this Request on the grounds that it seeks documents that are protected by the attorney-client privilege, work-product doctrine, or any other applicable privilege, immunity, or protection. Plaintiff further objects to this Request on the grounds that it seeks private or confidential documents. Plaintiff further objects to this Request on the grounds that it is duplicative of other discovery. Plaintiff further objects that the Request is unreasonably broad and vague and calls for a legal conclusion in that it seeks all documents “supporting, refuting, or otherwise relating to” a statement. Plaintiff objects that Defendant has failed to describe reasonably identifiable categories of documents for production and instead has improperly attempted to shift the burden to Plaintiff to analyze what documents might be deemed to “support[,], refut[e], or otherwise relat[e]” to a particular statement, which implicates the work product of counsel. Plaintiff further objects to the Request as being unduly cumulative and harassing.

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

RESPONSE:

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

Requests are facially excessive, unduly burdensome, and harassing, and represent a misuse of the discovery process. Plaintiff further objects to this Request on the grounds that it seeks documents that are neither relevant nor reasonably calculated to lead to the discovery of admissible evidence. Plaintiff further objects to this Request on the grounds that it is overly broad and unduly burdensome taking into account the needs of the case, including because it seeks “all” documents. Plaintiff further objects to this Request on the grounds that it is lacking in reasonable particularity. Plaintiff further objects to this Request on the grounds that it seeks documents that are protected by the attorney-client privilege, work-product doctrine, or any other applicable privilege, immunity, or protection. Plaintiff further objects to this Request on the grounds that it seeks private or confidential documents. Plaintiff further objects to this Request on the grounds that it is duplicative of other discovery. Plaintiff further objects that the Request is unreasonably broad and vague and calls for a legal conclusion in that it seeks all documents “supporting, refuting, or otherwise relating to” a statement. Plaintiff objects that Defendant has failed to describe reasonably identifiable categories of documents for production and instead has improperly attempted to shift the burden to Plaintiff to analyze what documents might be deemed to “support[], refut[e], or otherwise relat[e]” to a particular statement, which implicates the work product of counsel. Plaintiff further objects to the Request as being unduly cumulative and harassing.

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

RESPONSE:

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

Requests in this set of Requests for Production alone, and the content and number of these Requests are facially excessive, unduly burdensome, and harassing, and represent a misuse of the discovery process. Plaintiff further objects to this Request on the grounds that it seeks documents that are neither relevant nor reasonably calculated to lead to the discovery of admissible evidence. Plaintiff further objects to this Request on the grounds that it is overly broad and unduly burdensome taking into account the needs of the case, including because it seeks “all” documents. Plaintiff further objects to this Request on the grounds that it is lacking in reasonable particularity. Plaintiff further objects to this Request on the grounds that it seeks documents that are protected by the attorney-client privilege, work-product doctrine, or any other applicable privilege, immunity, or protection. Plaintiff further objects to this Request on the grounds that it seeks private or confidential documents. Plaintiff further objects to this Request on the grounds that it is duplicative of other discovery. Plaintiff further objects that the Request is unreasonably broad and vague and calls for a legal conclusion in that it seeks all documents “supporting, refuting, or otherwise relating to” a statement. Plaintiff objects that Defendant has failed to describe reasonably identifiable categories of documents for production and instead has improperly attempted to shift the burden to Plaintiff to analyze what documents might be deemed to “support[], refut[e], or otherwise relat[e]” to a particular statement, which implicates the work product of counsel. Plaintiff further objects to the Request as being unduly cumulative and harassing.

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

RESPONSE:

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

Request – and to all other Requests herein – on the grounds that Defendant has served 217 Requests in this set of Requests for Production alone, and the content and number of these Requests are facially excessive, unduly burdensome, and harassing, and represent a misuse of the discovery process. Plaintiff further objects to this Request on the grounds that it seeks documents that are neither relevant nor reasonably calculated to lead to the discovery of admissible evidence. Plaintiff further objects to this Request on the grounds that it is overly broad and unduly burdensome taking into account the needs of the case, including because it seeks “all” documents. Plaintiff further objects to this Request on the grounds that it is lacking in reasonable particularity. Plaintiff further objects to this Request on the grounds that it seeks documents that are protected by the attorney-client privilege, work-product doctrine, or any other applicable privilege, immunity, or protection. Plaintiff further objects to this Request on the grounds that it seeks private or confidential documents. Plaintiff further objects to this Request on the grounds that it is duplicative of other discovery. Plaintiff further objects that the Request is unreasonably broad and vague and calls for a legal conclusion in that it seeks all documents “supporting, refuting, or otherwise relating to” a statement. Plaintiff objects that Defendant has failed to describe reasonably identifiable categories of documents for production and instead has improperly attempted to shift the burden to Plaintiff to analyze what documents might be deemed to “support[], refut[e], or otherwise relat[e]” to a particular statement, which implicates the work product of counsel. Plaintiff further objects to the Request as being unduly cumulative and harassing.

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

RESPONSE:

Plaintiff repeats and incorporates by this reference the General Objections and Objections to Definitions and Instruction above, as though set forth in full. Plaintiff further objects to this Request – and to all other Requests herein – on the grounds that Defendant has served 217 Requests in this set of Requests for Production alone, and the content and number of these Requests are facially excessive, unduly burdensome, and harassing, and represent a misuse of the discovery process. Plaintiff further objects to this Request on the grounds that it seeks documents that are neither relevant nor reasonably calculated to lead to the discovery of admissible evidence. Plaintiff further objects to this Request on the grounds that it is overly broad and unduly burdensome taking into account the needs of the case, including because it seeks “all” documents. Plaintiff further objects to this Request on the grounds that it is lacking in reasonable particularity. Plaintiff further objects to this Request on the grounds that it seeks documents that are protected by the attorney-client privilege, work-product doctrine, or any other applicable privilege, immunity, or protection. Plaintiff further objects to this Request on the grounds that it seeks private or confidential documents. Plaintiff further objects to this Request on the grounds that it is duplicative of other discovery. Plaintiff further objects that the Request is unreasonably broad and vague and calls for a legal conclusion in that it seeks all documents “supporting, refuting, or otherwise relating to” a statement. Plaintiff objects that Defendant has failed to describe reasonably identifiable categories of documents for production and instead has improperly attempted to shift the burden to Plaintiff to analyze what documents might be deemed to “support[], refut[e], or otherwise relat[e]” to a particular statement, which implicates the work

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

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

RESPONSE:

Plaintiff repeats and incorporates by this reference the General Objections and Objections to Definitions and Instruction above, as though set forth in full. Plaintiff further objects to this Request – and to all other Requests herein – on the grounds that Defendant has served 217 Requests in this set of Requests for Production alone, and the content and number of these Requests are facially excessive, unduly burdensome, and harassing, and represent a misuse of the discovery process. Plaintiff further objects to this Request on the grounds that it seeks documents that are neither relevant nor reasonably calculated to lead to the discovery of admissible evidence. Plaintiff further objects to this Request on the grounds that it is overly broad and unduly burdensome taking into account the needs of the case, including because it seeks “all” documents. Plaintiff further objects to this Request on the grounds that it is lacking in reasonable particularity. Plaintiff further objects to this Request on the grounds that it seeks documents that are protected by the attorney-client privilege, work-product doctrine, or any other applicable privilege, immunity, or protection. Plaintiff further objects to this Request on the grounds that it seeks private or confidential documents. Plaintiff further objects to this Request on the grounds that it is duplicative of other discovery. Plaintiff further objects that the Request is unreasonably broad and vague and calls for a legal conclusion in that it seeks all documents “supporting, refuting, or otherwise relating to” a statement. Plaintiff objects that Defendant has failed to describe reasonably identifiable categories of documents for production and instead has improperly attempted to shift the burden to Plaintiff to analyze what documents might be deemed

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

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

RESPONSE:

Plaintiff repeats and incorporates by this reference the General Objections and Objections to Definitions and Instruction above, as though set forth in full. Plaintiff further objects to this Request – and to all other Requests herein – on the grounds that Defendant has served 217 Requests in this set of Requests for Production alone, and the content and number of these Requests are facially excessive, unduly burdensome, and harassing, and represent a misuse of the discovery process. Plaintiff further objects to this Request on the grounds that it seeks documents that are neither relevant nor reasonably calculated to lead to the discovery of admissible evidence. Plaintiff further objects to this Request on the grounds that it is overly broad and unduly burdensome taking into account the needs of the case, including because it seeks “all” documents. Plaintiff further objects to this Request on the grounds that it is lacking in reasonable particularity. Plaintiff further objects to this Request on the grounds that it seeks documents that are protected by the attorney-client privilege, work-product doctrine, or any other applicable privilege, immunity, or protection. Plaintiff further objects to this Request on the grounds that it seeks private or confidential documents. Plaintiff further objects to this Request on the grounds that it is duplicative of other discovery. Plaintiff further objects that the Request is unreasonably broad and vague and calls for a legal conclusion in that it seeks all documents “supporting, refuting, or otherwise relating to” a statement. Plaintiff objects that Defendant has failed to describe reasonably identifiable categories of documents for production and instead has

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

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

RESPONSE:

Plaintiff repeats and incorporates by this reference the General Objections and Objections to Definitions and Instruction above, as though set forth in full. Plaintiff further objects to this Request – and to all other Requests herein – on the grounds that Defendant has served 217 Requests in this set of Requests for Production alone, and the content and number of these Requests are facially excessive, unduly burdensome, and harassing, and represent a misuse of the discovery process. Plaintiff further objects to this Request on the grounds that it seeks documents that are neither relevant nor reasonably calculated to lead to the discovery of admissible evidence. Plaintiff further objects to this Request on the grounds that it is overly broad and unduly burdensome taking into account the needs of the case, including because it seeks “all” documents. Plaintiff further objects to this Request on the grounds that it is lacking in reasonable particularity. Plaintiff further objects to this Request on the grounds that it seeks documents that are protected by the attorney-client privilege, work-product doctrine, or any other applicable privilege, immunity, or protection. Plaintiff further objects to this Request on the grounds that it seeks private or confidential documents. Plaintiff further objects to this Request on the grounds that it is duplicative of other discovery. Plaintiff further objects that the Request is unreasonably broad and vague and calls for a legal conclusion in that it seeks all documents “supporting, refuting, or otherwise relating to” a statement. Plaintiff objects that Defendant has

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

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

RESPONSE:

Plaintiff repeats and incorporates by this reference the General Objections and Objections to Definitions and Instruction above, as though set forth in full. Plaintiff further objects to this Request – and to all other Requests herein – on the grounds that Defendant has served 217 Requests in this set of Requests for Production alone, and the content and number of these Requests are facially excessive, unduly burdensome, and harassing, and represent a misuse of the discovery process. Plaintiff further objects to this Request on the grounds that it seeks documents that are neither relevant nor reasonably calculated to lead to the discovery of admissible evidence. Plaintiff further objects to this Request on the grounds that it is overly broad and unduly burdensome taking into account the needs of the case, including because it seeks “all” documents. Plaintiff further objects to this Request on the grounds that it is lacking in reasonable particularity. Plaintiff further objects to this Request on the grounds that it seeks documents that are protected by the attorney-client privilege, work-product doctrine, or any other applicable privilege, immunity, or protection. Plaintiff further objects to this Request on the grounds that it seeks private or confidential documents. Plaintiff further objects to this Request on the grounds that it is duplicative of other discovery. Plaintiff further objects that the Request is unreasonably broad and vague and calls for a legal conclusion in that it seeks all documents

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

RESPONSE:

Plaintiff repeats and incorporates by this reference the General Objections and Objections to Definitions and Instruction above, as though set forth in full. Plaintiff further objects to this Request – and to all other Requests herein – on the grounds that Defendant has served 217 Requests in this set of Requests for Production alone, and the content and number of these Requests are facially excessive, unduly burdensome, and harassing, and represent a misuse of the discovery process. Plaintiff further objects to this Request on the grounds that it seeks documents that are neither relevant nor reasonably calculated to lead to the discovery of admissible evidence. Plaintiff further objects to this Request on the grounds that it is overly broad and unduly burdensome taking into account the needs of the case, including because it seeks “all” documents. Plaintiff further objects to this Request on the grounds that it is lacking in reasonable particularity. Plaintiff further objects to this Request on the grounds that it seeks documents that are protected by the attorney-client privilege, work-product doctrine, or any other applicable privilege, immunity, or protection. Plaintiff further objects to this Request on the grounds that it seeks private or confidential documents. Plaintiff further objects to this Request on the grounds that it is duplicative of other discovery. Plaintiff further objects that the Request

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

RESPONSE:

Plaintiff repeats and incorporates by this reference the General Objections and Objections to Definitions and Instruction above, as though set forth in full. Plaintiff further objects to this Request – and to all other Requests herein – on the grounds that Defendant has served 217 Requests in this set of Requests for Production alone, and the content and number of these Requests are facially excessive, unduly burdensome, and harassing, and represent a misuse of the discovery process. Plaintiff further objects to this Request on the grounds that it seeks documents that are neither relevant nor reasonably calculated to lead to the discovery of admissible evidence. Plaintiff further objects to this Request on the grounds that it is overly broad and unduly burdensome taking into account the needs of the case, including because it seeks “all” documents. Plaintiff further objects to this Request on the grounds that it is lacking in reasonable particularity. Plaintiff further objects to this Request on the grounds that it seeks documents that are protected by the attorney-client privilege, work-product doctrine, or any other applicable privilege, immunity, or protection. Plaintiff further objects to this Request on the grounds that it seeks private or confidential documents. Plaintiff further objects to this Request

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

RESPONSE:

Plaintiff repeats and incorporates by this reference the General Objections and Objections to Definitions and Instruction above, as though set forth in full. Plaintiff further objects to this Request – and to all other Requests herein – on the grounds that Defendant has served 217 Requests in this set of Requests for Production alone, and the content and number of these Requests are facially excessive, unduly burdensome, and harassing, and represent a misuse of the discovery process. Plaintiff further objects to this Request on the grounds that it seeks documents that are neither relevant nor reasonably calculated to lead to the discovery of admissible evidence. Plaintiff further objects to this Request on the grounds that it is overly broad and unduly burdensome taking into account the needs of the case, including because it seeks “all” documents. Plaintiff further objects to this Request on the grounds that it is lacking in reasonable particularity. Plaintiff further objects to this Request on the grounds that it seeks documents that are protected by the attorney-client privilege, work-product doctrine, or any other applicable privilege, immunity, or protection. Plaintiff further objects to this Request on the

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

RESPONSE:

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

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

RESPONSE:

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

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

RESPONSE:

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

Requests are facially excessive, unduly burdensome, and harassing, and represent a misuse of the discovery process. Plaintiff further objects to this Request on the grounds that it seeks documents that are neither relevant nor reasonably calculated to lead to the discovery of admissible evidence. Plaintiff further objects to this Request on the grounds that it is overly broad and unduly burdensome taking into account the needs of the case, including because it seeks “all” documents. Plaintiff further objects to this Request on the grounds that it is lacking in reasonable particularity. Plaintiff further objects to this Request on the grounds that it seeks documents that are protected by the attorney-client privilege, work-product doctrine, or any other applicable privilege, immunity, or protection. Plaintiff further objects to this Request on the grounds that it seeks private or confidential documents. Plaintiff further objects to this Request on the grounds that it is duplicative of other discovery. Plaintiff further objects that the Request is unreasonably broad and vague and calls for a legal conclusion in that it seeks all documents “supporting, refuting, or otherwise relating to” a statement. Plaintiff objects that Defendant has failed to describe reasonably identifiable categories of documents for production and instead has improperly attempted to shift the burden to Plaintiff to analyze what documents might be deemed to “support[], refut[e], or otherwise relat[e]” to a particular statement, which implicates the work product of counsel. Plaintiff further objects to the Request as being unduly cumulative and harassing.

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

RESPONSE:

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

Requests in this set of Requests for Production alone, and the content and number of these Requests are facially excessive, unduly burdensome, and harassing, and represent a misuse of the discovery process. Plaintiff further objects to this Request on the grounds that it seeks documents that are neither relevant nor reasonably calculated to lead to the discovery of admissible evidence. Plaintiff further objects to this Request on the grounds that it is overly broad and unduly burdensome taking into account the needs of the case, including because it seeks “all” documents. Plaintiff further objects to this Request on the grounds that it is lacking in reasonable particularity. Plaintiff further objects to this Request on the grounds that it seeks documents that are protected by the attorney-client privilege, work-product doctrine, or any other applicable privilege, immunity, or protection. Plaintiff further objects to this Request on the grounds that it seeks private or confidential documents. Plaintiff further objects to this Request on the grounds that it is duplicative of other discovery. Plaintiff further objects that the Request is unreasonably broad and vague and calls for a legal conclusion in that it seeks all documents “supporting, refuting, or otherwise relating to” a statement. Plaintiff objects that Defendant has failed to describe reasonably identifiable categories of documents for production and instead has improperly attempted to shift the burden to Plaintiff to analyze what documents might be deemed to “support[,], refut[e], or otherwise relat[e]” to a particular statement, which implicates the work product of counsel. Plaintiff further objects to the Request as being unduly cumulative and harassing.

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

RESPONSE:

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

Request – and to all other Requests herein – on the grounds that Defendant has served 217 Requests in this set of Requests for Production alone, and the content and number of these Requests are facially excessive, unduly burdensome, and harassing, and represent a misuse of the discovery process. Plaintiff further objects to this Request on the grounds that it seeks documents that are neither relevant nor reasonably calculated to lead to the discovery of admissible evidence. Plaintiff further objects to this Request on the grounds that it is overly broad and unduly burdensome taking into account the needs of the case, including because it seeks “all” documents. Plaintiff further objects to this Request on the grounds that it is lacking in reasonable particularity. Plaintiff further objects to this Request on the grounds that it seeks documents that are protected by the attorney-client privilege, work-product doctrine, or any other applicable privilege, immunity, or protection. Plaintiff further objects to this Request on the grounds that it seeks private or confidential documents. Plaintiff further objects to this Request on the grounds that it is duplicative of other discovery. Plaintiff further objects that the Request is unreasonably broad and vague and calls for a legal conclusion in that it seeks all documents “supporting, refuting, or otherwise relating to” a statement. Plaintiff objects that Defendant has failed to describe reasonably identifiable categories of documents for production and instead has improperly attempted to shift the burden to Plaintiff to analyze what documents might be deemed to “support[], refut[e], or otherwise relat[e]” to a particular statement, which implicates the work product of counsel. Plaintiff further objects to the Request as being unduly cumulative and harassing.

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

RESPONSE:

Plaintiff repeats and incorporates by this reference the General Objections and Objections to Definitions and Instruction above, as though set forth in full. Plaintiff further objects to this Request – and to all other Requests herein – on the grounds that Defendant has served 217 Requests in this set of Requests for Production alone, and the content and number of these Requests are facially excessive, unduly burdensome, and harassing, and represent a misuse of the discovery process. Plaintiff further objects to this Request on the grounds that it seeks documents that are neither relevant nor reasonably calculated to lead to the discovery of admissible evidence. Plaintiff further objects to this Request on the grounds that it is overly broad and unduly burdensome taking into account the needs of the case, including because it seeks “all” documents. Plaintiff further objects to this Request on the grounds that it is lacking in reasonable particularity. Plaintiff further objects to this Request on the grounds that it seeks documents that are protected by the attorney-client privilege, work-product doctrine, or any other applicable privilege, immunity, or protection. Plaintiff further objects to this Request on the grounds that it seeks private or confidential documents. Plaintiff further objects to this Request on the grounds that it is duplicative of other discovery. Plaintiff further objects that the Request is unreasonably broad and vague and calls for a legal conclusion in that it seeks all documents “supporting, refuting, or otherwise relating to” a statement. Plaintiff objects that Defendant has failed to describe reasonably identifiable categories of documents for production and instead has improperly attempted to shift the burden to Plaintiff to analyze what documents might be deemed to “support[,], refut[e], or otherwise relat[e]” to a particular statement, which implicates the work

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

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

RESPONSE:

Plaintiff repeats and incorporates by this reference the General Objections and Objections to Definitions and Instruction above, as though set forth in full. Plaintiff further objects to this Request – and to all other Requests herein – on the grounds that Defendant has served 217 Requests in this set of Requests for Production alone, and the content and number of these Requests are facially excessive, unduly burdensome, and harassing, and represent a misuse of the discovery process. Plaintiff further objects to this Request on the grounds that it seeks documents that are neither relevant nor reasonably calculated to lead to the discovery of admissible evidence. Plaintiff further objects to this Request on the grounds that it is overly broad and unduly burdensome taking into account the needs of the case, including because it seeks “all” documents. Plaintiff further objects to this Request on the grounds that it is lacking in reasonable particularity. Plaintiff further objects to this Request on the grounds that it seeks documents that are protected by the attorney-client privilege, work-product doctrine, or any other applicable privilege, immunity, or protection. Plaintiff further objects to this Request on the grounds that it seeks private or confidential documents. Plaintiff further objects to this Request on the grounds that it is duplicative of other discovery. Plaintiff further objects that the Request is unreasonably broad and vague and calls for a legal conclusion in that it seeks all documents “supporting, refuting, or otherwise relating to” a statement. Plaintiff objects that Defendant has failed to describe reasonably identifiable categories of documents for production and instead has improperly attempted to shift the burden to Plaintiff to analyze what documents might be deemed

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

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

RESPONSE:

Plaintiff repeats and incorporates by this reference the General Objections and Objections to Definitions and Instruction above, as though set forth in full. Plaintiff further objects to this Request – and to all other Requests herein – on the grounds that Defendant has served 217 Requests in this set of Requests for Production alone, and the content and number of these Requests are facially excessive, unduly burdensome, and harassing, and represent a misuse of the discovery process. Plaintiff further objects to this Request on the grounds that it seeks documents that are neither relevant nor reasonably calculated to lead to the discovery of admissible evidence. Plaintiff further objects to this Request on the grounds that it is overly broad and unduly burdensome taking into account the needs of the case, including because it seeks “all” documents. Plaintiff further objects to this Request on the grounds that it is lacking in reasonable particularity. Plaintiff further objects to this Request on the grounds that it seeks documents that are protected by the attorney-client privilege, work-product doctrine, or any other applicable privilege, immunity, or protection. Plaintiff further objects to this Request on the grounds that it seeks private or confidential documents. Plaintiff further objects to this Request on the grounds that it is duplicative of other discovery. Plaintiff further objects that the Request is unreasonably broad and vague and calls for a legal conclusion in that it seeks all documents “supporting, refuting, or otherwise relating to” a statement. Plaintiff objects that Defendant has failed to describe reasonably identifiable categories of documents for production and instead has

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

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

RESPONSE:

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

discovery process. Plaintiff further objects to this Request on the grounds that it seeks documents that are neither relevant nor reasonably calculated to lead to the discovery of admissible evidence. Plaintiff further objects on the grounds that the Request purports to require Plaintiff to speculate as to what documents might relate to Defendant's own allegations. Plaintiff further objects to this Request on the grounds that it is overly broad and unduly burdensome taking into account the needs of the case, including because it seeks "all" documents. Plaintiff further objects to this Request on the grounds that it is lacking in reasonable particularity. Plaintiff further objects to this Request on the grounds that it seeks documents that are protected by the attorney-client privilege, work-product doctrine, or any other applicable privilege, immunity, or protection. Plaintiff further objects to this Request on the grounds that it seeks private or confidential documents. Plaintiff further objects to this Request on the grounds that it is duplicative of other discovery. Plaintiff further objects that the Request is unreasonably broad and vague and calls for a legal conclusion in that it seeks all documents "supporting, refuting, or otherwise related to" a statement. Plaintiff objects that Defendant has failed to describe reasonably identifiable categories of documents for production and instead has improperly attempted to shift the burden to Plaintiff to analyze what documents might be deemed to "support[], refut[e], or otherwise relat[e]" to a particular statement, which implicates the work product of counsel. Plaintiff further objects to this Request on the grounds that it seeks documents already in possession of Defendant and/or her attorneys, and/or is equally available to Defendant and/or her attorneys, and represents an improper attempt to shift the burden of producing such documents to Plaintiff, where such statements were made in Defendant's own Declaration. Plaintiff further objects to the Request as being unduly cumulative and harassing.

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

RESPONSE:

Plaintiff repeats and incorporates by this reference the General Objections and Objections to Definitions and Instruction above, as though set forth in full. Plaintiff further objects to this Request – and to all other Requests herein – on the grounds that Defendant has served 217 Requests in this set of Requests for Production alone, and the content and number of these Requests are facially excessive, unduly burdensome, and harassing, and represent a misuse of the discovery process. Plaintiff further objects to this Request on the grounds that it seeks documents that are neither relevant nor reasonably calculated to lead to the discovery of admissible evidence. Plaintiff further objects on the grounds that the Request purports to require Plaintiff to speculate as to what documents might relate to Defendant’s own allegations. Plaintiff further objects to this Request on the grounds that it is overly broad and unduly burdensome taking into account the needs of the case, including because it seeks “all” documents. Plaintiff further objects to this Request on the grounds that it is lacking in reasonable particularity. Plaintiff further objects to this Request on the grounds that it seeks documents that are protected by the attorney-client privilege, work-product doctrine, or any other applicable privilege, immunity, or protection. Plaintiff further objects to this Request on the grounds that it seeks private or confidential documents. Plaintiff further objects to this Request on the grounds that it is duplicative of other discovery. Plaintiff further objects that the Request is unreasonably broad and vague and calls for a legal conclusion in that it seeks all documents “supporting, refuting, or otherwise related to” a statement. Plaintiff objects that Defendant has failed to describe reasonably identifiable categories of documents for production and instead has improperly attempted to shift the burden to Plaintiff to analyze what documents might be deemed to

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

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

RESPONSE:

Plaintiff repeats and incorporates by this reference the General Objections and Objections to Definitions and Instruction above, as though set forth in full. Plaintiff further objects to this Request – and to all other Requests herein – on the grounds that Defendant has served 217 Requests in this set of Requests for Production alone, and the content and number of these Requests are facially excessive, unduly burdensome, and harassing, and represent a misuse of the discovery process. Plaintiff further objects to this Request on the grounds that it seeks documents that are neither relevant nor reasonably calculated to lead to the discovery of admissible evidence. Plaintiff further objects on the grounds that the Request purports to require Plaintiff to speculate as to what documents might relate to Defendant’s own allegations. Plaintiff further objects to this Request on the grounds that it is overly broad and unduly burdensome taking into account the needs of the case, including because it seeks “all” documents. Plaintiff further objects to this Request on the grounds that it is lacking in reasonable particularity. Plaintiff further objects to this Request on the grounds that it seeks documents that are protected by the attorney-client privilege, work-product doctrine, or any other applicable privilege,

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

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

RESPONSE:

Plaintiff repeats and incorporates by this reference the General Objections and Objections to Definitions and Instruction above, as though set forth in full. Plaintiff further objects to this Request – and to all other Requests herein – on the grounds that Defendant has served 217 Requests in this set of Requests for Production alone, and the content and number of these Requests are facially excessive, unduly burdensome, and harassing, and represent a misuse of the discovery process. Plaintiff further objects to this Request on the grounds that it seeks documents that are neither relevant nor reasonably calculated to lead to the discovery of admissible evidence. Plaintiff further objects on the grounds that the Request purports to require

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

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

RESPONSE:

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

Request – and to all other Requests herein – on the grounds that Defendant has served 217 Requests in this set of Requests for Production alone, and the content and number of these Requests are facially excessive, unduly burdensome, and harassing, and represent a misuse of the discovery process. Plaintiff further objects to this Request on the grounds that it seeks documents that are neither relevant nor reasonably calculated to lead to the discovery of admissible evidence. Plaintiff further objects on the grounds that the Request purports to require Plaintiff to speculate as to what documents might relate to Defendant’s own allegations. Plaintiff further objects to this Request on the grounds that it is overly broad and unduly burdensome taking into account the needs of the case, including because it seeks “all” documents. Plaintiff further objects to this Request on the grounds that it is lacking in reasonable particularity. Plaintiff further objects to this Request on the grounds that it seeks documents that are protected by the attorney-client privilege, work-product doctrine, or any other applicable privilege, immunity, or protection. Plaintiff further objects to this Request on the grounds that it seeks private or confidential documents. Plaintiff further objects to this Request on the grounds that it is duplicative of other discovery. Plaintiff further objects that the Request is unreasonably broad and vague and calls for a legal conclusion in that it seeks all documents “supporting, refuting, or otherwise related to” a statement. Plaintiff objects that Defendant has failed to describe reasonably identifiable categories of documents for production and instead has improperly attempted to shift the burden to Plaintiff to analyze what documents might be deemed to “support[], refut[e], or otherwise relat[e]” to a particular statement, which implicates the work product of counsel. Plaintiff further objects to this Request on the grounds that it seeks documents already in possession of Defendant and/or her attorneys, and/or is equally available to Defendant and/or her attorneys, and represents an improper attempt to shift the burden of

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

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

RESPONSE:

Plaintiff repeats and incorporates by this reference the General Objections and Objections to Definitions and Instruction above, as though set forth in full. Plaintiff further objects to this Request – and to all other Requests herein – on the grounds that Defendant has served 217 Requests in this set of Requests for Production alone, and the content and number of these Requests are facially excessive, unduly burdensome, and harassing, and represent a misuse of the discovery process. Plaintiff further objects to this Request on the grounds that it seeks documents that are neither relevant nor reasonably calculated to lead to the discovery of admissible evidence. Plaintiff further objects on the grounds that the Request purports to require Plaintiff to speculate as to what documents might relate to Defendant's own allegations. Plaintiff further objects to this Request on the grounds that it is overly broad and unduly burdensome taking into account the needs of the case, including because it seeks "all" documents. Plaintiff further objects to this Request on the grounds that it is lacking in reasonable particularity. Plaintiff further objects to this Request on the grounds that it seeks documents that are protected by the attorney-client privilege, work-product doctrine, or any other applicable privilege, immunity, or protection. Plaintiff further objects to this Request on the grounds that it seeks private or confidential documents. Plaintiff further objects to this Request on the grounds that it is duplicative of other discovery. Plaintiff further objects that the Request is unreasonably broad and vague and calls for a legal conclusion in that it seeks all documents "supporting, refuting, or otherwise related to" a statement. Plaintiff objects that Defendant has failed to describe

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

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

RESPONSE:

Plaintiff repeats and incorporates by this reference the General Objections and Objections to Definitions and Instruction above, as though set forth in full. Plaintiff further objects to this Request – and to all other Requests herein – on the grounds that Defendant has served 217 Requests in this set of Requests for Production alone, and the content and number of these Requests are facially excessive, unduly burdensome, and harassing, and represent a misuse of the discovery process. Plaintiff further objects to this Request on the grounds that it seeks documents that are neither relevant nor reasonably calculated to lead to the discovery of admissible evidence. Plaintiff further objects on the grounds that the Request purports to require Plaintiff to speculate as to what documents might relate to Defendant’s own allegations. Plaintiff further objects to this Request on the grounds that it is overly broad and unduly burdensome taking into account the needs of the case, including because it seeks “all” documents. Plaintiff further objects to this Request on the grounds that it is lacking in reasonable particularity. Plaintiff further objects to this Request on the grounds that it seeks documents that are protected

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

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

RESPONSE:

Plaintiff repeats and incorporates by this reference the General Objections and Objections to Definitions and Instruction above, as though set forth in full. Plaintiff further objects to this Request – and to all other Requests herein – on the grounds that Defendant has served 217 Requests in this set of Requests for Production alone, and the content and number of these Requests are facially excessive, unduly burdensome, and harassing, and represent a misuse of the discovery process. Plaintiff further objects to this Request on the grounds that it seeks documents that are neither relevant nor reasonably calculated to lead to the discovery of

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

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

RESPONSE:

Plaintiff repeats and incorporates by this reference the General Objections and Objections to Definitions and Instruction above, as though set forth in full. Plaintiff further objects to this Request – and to all other Requests herein – on the grounds that Defendant has served 217 Requests in this set of Requests for Production alone, and the content and number of these Requests are facially excessive, unduly burdensome, and harassing, and represent a misuse of the discovery process. Plaintiff further objects to this Request on the grounds that it seeks documents that are neither relevant nor reasonably calculated to lead to the discovery of admissible evidence. Plaintiff further objects on the grounds that the Request purports to require Plaintiff to speculate as to what documents might relate to Defendant’s own allegations. Plaintiff further objects to this Request on the grounds that it is overly broad and unduly burdensome taking into account the needs of the case, including because it seeks “all” documents. Plaintiff further objects to this Request on the grounds that it is lacking in reasonable particularity. Plaintiff further objects to this Request on the grounds that it seeks documents that are protected by the attorney-client privilege, work-product doctrine, or any other applicable privilege, immunity, or protection. Plaintiff further objects to this Request on the grounds that it seeks private or confidential documents. Plaintiff further objects to this Request on the grounds that it is duplicative of other discovery. Plaintiff further objects that the Request is unreasonably broad and vague and calls for a legal conclusion in that it seeks all documents “supporting, refuting, or otherwise related to” a statement. Plaintiff objects that Defendant has failed to describe reasonably identifiable categories of documents for production and instead has improperly attempted to shift the burden to Plaintiff to analyze what documents might be deemed to “support[], refut[e], or otherwise relat[e]” to a particular statement, which implicates the work product of counsel. Plaintiff further objects to this Request on the grounds that it seeks

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

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

RESPONSE:

Plaintiff repeats and incorporates by this reference the General Objections and Objections to Definitions and Instruction above, as though set forth in full. Plaintiff further objects to this Request – and to all other Requests herein – on the grounds that Defendant has served 217 Requests in this set of Requests for Production alone, and the content and number of these Requests are facially excessive, unduly burdensome, and harassing, and represent a misuse of the discovery process. Plaintiff further objects to this Request on the grounds that it seeks documents that are neither relevant nor reasonably calculated to lead to the discovery of admissible evidence. Plaintiff further objects on the grounds that the Request purports to require Plaintiff to speculate as to what documents might relate to Defendant's own allegations. Plaintiff further objects to this Request on the grounds that it is overly broad and unduly burdensome taking into account the needs of the case, including because it seeks "all" documents. Plaintiff further objects to this Request on the grounds that it is lacking in reasonable particularity. Plaintiff further objects to this Request on the grounds that it seeks documents that are protected by the attorney-client privilege, work-product doctrine, or any other applicable privilege, immunity, or protection. Plaintiff further objects to this Request on the grounds that it seeks private or confidential documents. Plaintiff further objects to this Request on the grounds that it is duplicative of other discovery. Plaintiff further objects that the Request is unreasonably broad

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

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

RESPONSE:

Plaintiff repeats and incorporates by this reference the General Objections and Objections to Definitions and Instruction above, as though set forth in full. Plaintiff further objects to this Request – and to all other Requests herein – on the grounds that Defendant has served 217 Requests in this set of Requests for Production alone, and the content and number of these Requests are facially excessive, unduly burdensome, and harassing, and represent a misuse of the discovery process. Plaintiff further objects to this Request on the grounds that it seeks documents that are neither relevant nor reasonably calculated to lead to the discovery of admissible evidence. Plaintiff further objects on the grounds that the Request purports to require Plaintiff to speculate as to what documents might relate to Defendant’s own allegations. Plaintiff further objects to this Request on the grounds that it is overly broad and unduly burdensome taking into account the needs of the case, including because it seeks “all” documents. Plaintiff

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

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

RESPONSE:

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

discovery process. Plaintiff further objects to this Request on the grounds that it seeks documents that are neither relevant nor reasonably calculated to lead to the discovery of admissible evidence. Plaintiff further objects on the grounds that the Request purports to require Plaintiff to speculate as to what documents might relate to Defendant's own allegations. Plaintiff further objects to this Request on the grounds that it is overly broad and unduly burdensome taking into account the needs of the case, including because it seeks "all" documents. Plaintiff further objects to this Request on the grounds that it is lacking in reasonable particularity. Plaintiff further objects to this Request on the grounds that it seeks documents that are protected by the attorney-client privilege, work-product doctrine, or any other applicable privilege, immunity, or protection. Plaintiff further objects to this Request on the grounds that it seeks private or confidential documents. Plaintiff further objects to this Request on the grounds that it is duplicative of other discovery. Plaintiff further objects that the Request is unreasonably broad and vague and calls for a legal conclusion in that it seeks all documents "supporting, refuting, or otherwise related to" a statement. Plaintiff objects that Defendant has failed to describe reasonably identifiable categories of documents for production and instead has improperly attempted to shift the burden to Plaintiff to analyze what documents might be deemed to "support[], refut[e], or otherwise relat[e]" to a particular statement, which implicates the work product of counsel. Plaintiff further objects to this Request on the grounds that it seeks documents already in possession of Defendant and/or her attorneys, and/or is equally available to Defendant and/or her attorneys, and represents an improper attempt to shift the burden of producing such documents to Plaintiff, where such statements were made in Defendant's own Declaration. Plaintiff further objects to the Request as being unduly cumulative and harassing.

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

RESPONSE:

Plaintiff repeats and incorporates by this reference the General Objections and Objections to Definitions and Instruction above, as though set forth in full. Plaintiff further objects to this Request – and to all other Requests herein – on the grounds that Defendant has served 217 Requests in this set of Requests for Production alone, and the content and number of these Requests are facially excessive, unduly burdensome, and harassing, and represent a misuse of the discovery process. Plaintiff further objects to this Request on the grounds that it seeks documents that are neither relevant nor reasonably calculated to lead to the discovery of admissible evidence. Plaintiff further objects on the grounds that the Request purports to require Plaintiff to speculate as to what documents might relate to Defendant’s own allegations. Plaintiff further objects to this Request on the grounds that it is overly broad and unduly burdensome taking into account the needs of the case, including because it seeks “all” documents. Plaintiff further objects to this Request on the grounds that it is lacking in reasonable particularity. Plaintiff further objects to this Request on the grounds that it seeks documents that are protected by the attorney-client privilege, work-product doctrine, or any other applicable privilege, immunity, or protection. Plaintiff further objects to this Request on the grounds that it seeks private or confidential documents. Plaintiff further objects to this Request on the grounds that it is duplicative of other discovery. Plaintiff further objects that the Request is unreasonably broad and vague and calls for a legal conclusion in that it seeks all documents “supporting, refuting, or otherwise related to” a statement. Plaintiff objects that Defendant has failed to describe reasonably identifiable categories of documents for production and instead has improperly attempted to shift the burden to Plaintiff to analyze what documents might be deemed to

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

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

RESPONSE:

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

Requests in this set of Requests for Production alone, and the content and number of these Requests are facially excessive, unduly burdensome, and harassing, and represent a misuse of the discovery process. Plaintiff further objects to this Request on the grounds that it seeks documents that are neither relevant nor reasonably calculated to lead to the discovery of admissible evidence. Plaintiff further objects on the grounds that the Request purports to require Plaintiff to speculate as to what documents might relate to Defendant's own allegations. Plaintiff further objects to this Request on the grounds that it is overly broad and unduly burdensome taking into account the needs of the case, including because it seeks "all" documents. Plaintiff further objects to this Request on the grounds that it is lacking in reasonable particularity. Plaintiff further objects to this Request on the grounds that it seeks documents that are protected by the attorney-client privilege, work-product doctrine, or any other applicable privilege, immunity, or protection. Plaintiff further objects to this Request on the grounds that it seeks private or confidential documents. Plaintiff further objects to this Request on the grounds that it is duplicative of other discovery. Plaintiff further objects that the Request is unreasonably broad and vague and calls for a legal conclusion in that it seeks all documents "supporting, refuting, or otherwise related to" a statement. Plaintiff objects that Defendant has failed to describe reasonably identifiable categories of documents for production and instead has improperly attempted to shift the burden to Plaintiff to analyze what documents might be deemed to "support[], refut[e], or otherwise relat[e]" to a particular statement, which implicates the work product of counsel. Plaintiff further objects to this Request on the grounds that it seeks documents already in possession of Defendant and/or her attorneys, and/or is equally available to Defendant and/or her attorneys, and represents an improper attempt to shift the burden of

producing such documents to Plaintiff, where such statements were made by Defendant.

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

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

RESPONSE:

Plaintiff repeats and incorporates by this reference the General Objections and Objections to Definitions and Instruction above, as though set forth in full. Plaintiff further objects to this Request – and to all other Requests herein – on the grounds that Defendant has served 217 Requests in this set of Requests for Production alone, and the content and number of these Requests are facially excessive, unduly burdensome, and harassing, and represent a misuse of the discovery process. Plaintiff further objects to this Request on the grounds that it seeks documents that are neither relevant nor reasonably calculated to lead to the discovery of admissible evidence. Plaintiff further objects on the grounds that the Request purports to require Plaintiff to speculate as to what documents might relate to Defendant’s own allegations. Plaintiff further objects to this Request on the grounds that it is overly broad and unduly burdensome taking into account the needs of the case, including because it seeks “all” documents. Plaintiff further objects to this Request on the grounds that it is lacking in reasonable particularity. Plaintiff further objects to this Request on the grounds that it seeks documents that are protected by the attorney-client privilege, work-product doctrine, or any other applicable privilege, immunity, or protection. Plaintiff further objects to this Request on the grounds that it seeks private or confidential documents. Plaintiff further objects to this Request on the grounds that it is duplicative of other discovery. Plaintiff further objects that the Request is unreasonably broad and vague and calls for a legal conclusion in that it seeks all documents “supporting, refuting, or otherwise related to” a statement. Plaintiff objects that Defendant has failed to describe

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

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

RESPONSE:

Plaintiff repeats and incorporates by this reference the General Objections and Objections to Definitions and Instruction above, as though set forth in full. Plaintiff further objects to this Request – and to all other Requests herein – on the grounds that Defendant has served 217 Requests in this set of Requests for Production alone, and the content and number of these Requests are facially excessive, unduly burdensome, and harassing, and represent a misuse of the discovery process. Plaintiff further objects to this Request on the grounds that it seeks documents that are neither relevant nor reasonably calculated to lead to the discovery of admissible evidence. Plaintiff further objects on the grounds that the Request purports to require Plaintiff to speculate as to what documents might relate to Defendant’s own allegations. Plaintiff further objects to this Request on the grounds that it is overly broad and unduly burdensome taking into account the needs of the case, including because it seeks “all” documents. Plaintiff further objects to this Request on the grounds that it is lacking in reasonable particularity. Plaintiff further objects to this Request on the grounds that it seeks documents that are protected

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

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

RESPONSE:

Plaintiff repeats and incorporates by this reference the General Objections and Objections to Definitions and Instruction above, as though set forth in full. Plaintiff further objects to this Request – and to all other Requests herein – on the grounds that Defendant has served 217 Requests in this set of Requests for Production alone, and the content and number of these Requests are facially excessive, unduly burdensome, and harassing, and represent a misuse of the discovery process. Plaintiff further objects to this Request on the grounds that it seeks documents that are neither relevant nor reasonably calculated to lead to the discovery of

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

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

RESPONSE:

Plaintiff repeats and incorporates by this reference the General Objections and Objections to Definitions and Instruction above, as though set forth in full. Plaintiff further objects to this Request – and to all other Requests herein – on the grounds that Defendant has served 217 Requests in this set of Requests for Production alone, and the content and number of these Requests are facially excessive, unduly burdensome, and harassing, and represent a misuse of the discovery process. Plaintiff further objects to this Request on the grounds that it seeks documents that are neither relevant nor reasonably calculated to lead to the discovery of admissible evidence. Plaintiff further objects on the grounds that the Request purports to require Plaintiff to speculate as to what documents might relate to Defendant’s own allegations. Plaintiff further objects to this Request on the grounds that it is overly broad and unduly burdensome taking into account the needs of the case, including because it seeks “all” documents. Plaintiff further objects to this Request on the grounds that it is lacking in reasonable particularity. Plaintiff further objects to this Request on the grounds that it seeks documents that are protected by the attorney-client privilege, work-product doctrine, or any other applicable privilege, immunity, or protection. Plaintiff further objects to this Request on the grounds that it seeks private or confidential documents. Plaintiff further objects to this Request on the grounds that it is duplicative of other discovery. Plaintiff further objects that the Request is unreasonably broad and vague and calls for a legal conclusion in that it seeks all documents “supporting, refuting, or otherwise related to” a statement. Plaintiff objects that Defendant has failed to describe reasonably identifiable categories of documents for production and instead has improperly attempted to shift the burden to Plaintiff to analyze what documents might be deemed to “support[], refut[e], or otherwise relat[e]” to a particular statement, which implicates the work product of counsel. Plaintiff further objects to this Request on the grounds that it seeks

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

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

RESPONSE:

Plaintiff repeats and incorporates by this reference the General Objections and Objections to Definitions and Instruction above, as though set forth in full. Plaintiff further objects to this Request – and to all other Requests herein – on the grounds that Defendant has served 217 Requests in this set of Requests for Production alone, and the content and number of these Requests are facially excessive, unduly burdensome, and harassing, and represent a misuse of the discovery process. Plaintiff further objects to this Request on the grounds that it seeks documents that are neither relevant nor reasonably calculated to lead to the discovery of admissible evidence. Plaintiff further objects on the grounds that the Request purports to require Plaintiff to speculate as to what documents might relate to Defendant’s own allegations. Plaintiff further objects to this Request on the grounds that it is overly broad and unduly burdensome taking into account the needs of the case, including because it seeks “all” documents. Plaintiff further objects to this Request on the grounds that it is lacking in reasonable particularity. Plaintiff further objects to this Request on the grounds that it seeks documents that are protected by the attorney-client privilege, work-product doctrine, or any other applicable privilege, immunity, or protection. Plaintiff further objects to this Request on the grounds that it seeks private or confidential documents. Plaintiff further objects to this Request on the grounds that it is duplicative of other discovery. Plaintiff further objects that the Request is unreasonably broad

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

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

RESPONSE:

Plaintiff repeats and incorporates by this reference the General Objections and Objections to Definitions and Instruction above, as though set forth in full. Plaintiff further objects to this Request – and to all other Requests herein – on the grounds that Defendant has served 217 Requests in this set of Requests for Production alone, and the content and number of these Requests are facially excessive, unduly burdensome, and harassing, and represent a misuse of the discovery process. Plaintiff further objects to this Request on the grounds that it seeks documents that are neither relevant nor reasonably calculated to lead to the discovery of admissible evidence. Plaintiff further objects on the grounds that the Request purports to require Plaintiff to speculate as to what documents might relate to Defendant’s own allegations. Plaintiff further objects to this Request on the grounds that it is overly broad and unduly burdensome taking into account the needs of the case, including because it seeks “all” documents. Plaintiff

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

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

RESPONSE:

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

discovery process. Plaintiff further objects to this Request on the grounds that it seeks documents that are neither relevant nor reasonably calculated to lead to the discovery of admissible evidence. Plaintiff further objects on the grounds that the Request purports to require Plaintiff to speculate as to what documents might relate to Defendant's own allegations. Plaintiff further objects to this Request on the grounds that it is overly broad and unduly burdensome taking into account the needs of the case, including because it seeks "all" documents. Plaintiff further objects to this Request on the grounds that it is lacking in reasonable particularity. Plaintiff further objects to this Request on the grounds that it seeks documents that are protected by the attorney-client privilege, work-product doctrine, or any other applicable privilege, immunity, or protection. Plaintiff further objects to this Request on the grounds that it seeks private or confidential documents. Plaintiff further objects to this Request on the grounds that it is duplicative of other discovery. Plaintiff further objects that the Request is unreasonably broad and vague and calls for a legal conclusion in that it seeks all documents "supporting, refuting, or otherwise related to" a statement. Plaintiff objects that Defendant has failed to describe reasonably identifiable categories of documents for production and instead has improperly attempted to shift the burden to Plaintiff to analyze what documents might be deemed to "support[], refut[e], or otherwise relat[e]" to a particular statement, which implicates the work product of counsel. Plaintiff further objects to this Request on the grounds that it seeks documents already in possession of Defendant and/or her attorneys, and/or is equally available to Defendant and/or her attorneys, and represents an improper attempt to shift the burden of producing such documents to Plaintiff, where such statements were made by Defendant. Plaintiff further objects to the Request as being unduly cumulative and harassing.

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

RESPONSE:

Plaintiff repeats and incorporates by this reference the General Objections and Objections to Definitions and Instruction above, as though set forth in full. Plaintiff further objects to this Request – and to all other Requests herein – on the grounds that Defendant has served 217 Requests in this set of Requests for Production alone, and the content and number of these Requests are facially excessive, unduly burdensome, and harassing, and represent a misuse of the discovery process. Plaintiff further objects to this Request on the grounds that it seeks documents that are neither relevant nor reasonably calculated to lead to the discovery of admissible evidence. Plaintiff further objects on the grounds that the Request purports to require Plaintiff to speculate as to what documents might relate to Defendant’s own allegations. Plaintiff further objects to this Request on the grounds that it is overly broad and unduly burdensome taking into account the needs of the case, including because it seeks “all” documents. Plaintiff further objects to this Request on the grounds that it is lacking in reasonable particularity. Plaintiff further objects to this Request on the grounds that it seeks documents that are protected by the attorney-client privilege, work-product doctrine, or any other applicable privilege, immunity, or protection. Plaintiff further objects to this Request on the grounds that it seeks private or confidential documents. Plaintiff further objects to this Request on the grounds that it is duplicative of other discovery. Plaintiff further objects that the Request is unreasonably broad and vague and calls for a legal conclusion in that it seeks all documents “supporting, refuting, or otherwise related to” a statement. Plaintiff objects that Defendant has failed to describe reasonably identifiable categories of documents for production and instead has improperly attempted to shift the burden to Plaintiff to analyze what documents might be deemed to

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

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

RESPONSE:

Plaintiff repeats and incorporates by this reference the General Objections and Objections to Definitions and Instruction above, as though set forth in full. Plaintiff further objects to this Request – and to all other Requests herein – on the grounds that Defendant has served 217 Requests in this set of Requests for Production alone, and the content and number of these Requests are facially excessive, unduly burdensome, and harassing, and represent a misuse of the discovery process. Plaintiff further objects to this Request on the grounds that it seeks documents that are neither relevant nor reasonably calculated to lead to the discovery of admissible evidence. Plaintiff further objects on the grounds that the Request purports to require Plaintiff to speculate as to what documents might relate to Defendant’s own allegations. Plaintiff further objects to this Request on the grounds that it is overly broad and unduly burdensome taking into account the needs of the case, including because it seeks “all” documents. Plaintiff further objects to this Request on the grounds that it is lacking in reasonable particularity. Plaintiff further objects to this Request on the grounds that it seeks documents that are protected by the attorney-client privilege, work-product doctrine, or any other applicable privilege, immunity, or protection. Plaintiff further objects to this Request on the grounds that it seeks

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

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

RESPONSE:

Plaintiff repeats and incorporates by this reference the General Objections and Objections to Definitions and Instruction above, as though set forth in full. Plaintiff further objects to this Request – and to all other Requests herein – on the grounds that Defendant has served 217 Requests in this set of Requests for Production alone, and the content and number of these Requests are facially excessive, unduly burdensome, and harassing, and represent a misuse of the discovery process. Plaintiff further objects to this Request on the grounds that it seeks documents that are neither relevant nor reasonably calculated to lead to the discovery of admissible evidence. Plaintiff further objects on the grounds that the Request purports to require Plaintiff to speculate as to what documents might relate to Defendant’s own allegations. Plaintiff

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

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

RESPONSE:

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

Requests in this set of Requests for Production alone, and the content and number of these Requests are facially excessive, unduly burdensome, and harassing, and represent a misuse of the discovery process. Plaintiff further objects to this Request on the grounds that it seeks documents that are neither relevant nor reasonably calculated to lead to the discovery of admissible evidence. Plaintiff further objects on the grounds that the Request purports to require Plaintiff to speculate as to what documents might relate to Defendant's own allegations. Plaintiff further objects to this Request on the grounds that it is overly broad and unduly burdensome taking into account the needs of the case, including because it seeks "all" documents. Plaintiff further objects to this Request on the grounds that it is lacking in reasonable particularity. Plaintiff further objects to this Request on the grounds that it seeks documents that are protected by the attorney-client privilege, work-product doctrine, or any other applicable privilege, immunity, or protection. Plaintiff further objects to this Request on the grounds that it seeks private or confidential documents. Plaintiff further objects to this Request on the grounds that it is duplicative of other discovery. Plaintiff further objects that the Request is unreasonably broad and vague and calls for a legal conclusion in that it seeks all documents "supporting, refuting, or otherwise related to" a statement. Plaintiff objects that Defendant has failed to describe reasonably identifiable categories of documents for production and instead has improperly attempted to shift the burden to Plaintiff to analyze what documents might be deemed to "support[], refut[e], or otherwise relat[e]" to a particular statement, which implicates the work product of counsel. Plaintiff further objects to this Request on the grounds that it seeks documents already in possession of Defendant and/or her attorneys, and/or is equally available to Defendant and/or her attorneys, and represents an improper attempt to shift the burden of

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

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

RESPONSE:

Plaintiff repeats and incorporates by this reference the General Objections and Objections to Definitions and Instruction above, as though set forth in full. Plaintiff further objects to this Request – and to all other Requests herein – on the grounds that Defendant has served 217 Requests in this set of Requests for Production alone, and the content and number of these Requests are facially excessive, unduly burdensome, and harassing, and represent a misuse of the discovery process. Plaintiff further objects to this Request on the grounds that it seeks documents that are neither relevant nor reasonably calculated to lead to the discovery of admissible evidence. Plaintiff further objects on the grounds that the Request purports to require Plaintiff to speculate as to what documents might relate to Defendant’s own allegations. Plaintiff further objects to this Request on the grounds that it is overly broad and unduly burdensome taking into account the needs of the case, including because it seeks “all” documents. Plaintiff further objects to this Request on the grounds that it is lacking in reasonable particularity. Plaintiff further objects to this Request on the grounds that it seeks documents that are protected by the attorney-client privilege, work-product doctrine, or any other applicable privilege, immunity, or protection. Plaintiff further objects to this Request on the grounds that it seeks private or confidential documents. Plaintiff further objects to this Request on the grounds that it is duplicative of other discovery. Plaintiff further objects that the Request is unreasonably broad and vague and calls for a legal conclusion in that it seeks all documents “supporting, refuting, or otherwise related to” a statement. Plaintiff objects that Defendant has failed to describe

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

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

RESPONSE:

Plaintiff repeats and incorporates by this reference the General Objections and Objections to Definitions and Instruction above, as though set forth in full. Plaintiff further objects to this Request – and to all other Requests herein – on the grounds that Defendant has served 217 Requests in this set of Requests for Production alone, and the content and number of these Requests are facially excessive, unduly burdensome, and harassing, and represent a misuse of the discovery process. Plaintiff further objects to this Request on the grounds that it seeks documents that are neither relevant nor reasonably calculated to lead to the discovery of admissible evidence. Plaintiff further objects on the grounds that the Request purports to require Plaintiff to speculate as to what documents might relate to Defendant’s own allegations. Plaintiff further objects to this Request on the grounds that it is overly broad and unduly burdensome taking into account the needs of the case, including because it seeks “all” documents. Plaintiff further objects to this Request on the grounds that it is lacking in reasonable particularity. Plaintiff further objects to this Request on the grounds that it seeks documents that are protected

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

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

RESPONSE:

Plaintiff repeats and incorporates by this reference the General Objections and Objections to Definitions and Instruction above, as though set forth in full. Plaintiff further objects to this Request – and to all other Requests herein – on the grounds that Defendant has served 217 Requests in this set of Requests for Production alone, and the content and number of these Requests are facially excessive, unduly burdensome, and harassing, and represent a misuse of the discovery process. Plaintiff further objects to this Request on the grounds that it seeks documents that are neither relevant nor reasonably calculated to lead to the discovery of

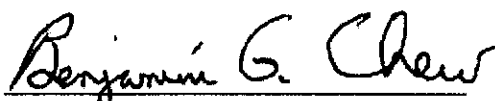
admissible evidence. Plaintiff further objects on the grounds that the Request purports to require Plaintiff to speculate as to what documents might relate to Defendant's own allegations. Plaintiff further objects to this Request on the grounds that it is overly broad and unduly burdensome taking into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

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

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

Dated: December 20, 2021

Respectfully submitted,



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

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

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

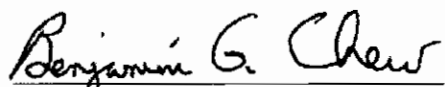
*Counsel for Plaintiff and
Counterclaim Defendant John C. Depp, II*

CERTIFICATE OF SERVICE

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

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

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


Benjamin G. Chew (VSB #29113)