

VIRGINIA :

IN THE CIRCUIT COURT OF FAIRFAX COUNTY

JOHN C. DEPP, II

Plaintiff,

v.

AMBER LAURA HEARD

Defendant.

Civil Action No.: CL-2019-0002911

**DEFENDANT AMBER LAURA HEARD'S RESPONSES AND OBJECTIONS TO
PLAINTIFF'S FIRST REQUESTS FOR ADMISSION**

Pursuant to Rule 4:1 and 4:11 of the Rules of the Supreme Court of Virginia ("Rules"), Defendant Amber Laura Heard, by and through her attorneys, submits these responses and objections (the "Responses") to Plaintiff John C. Depp's First Requests for Admission dated November 25, 2019 (the "Requests").

GENERAL OBJECTIONS

The following general objections and responses (the "General Objections") are incorporated into each specific objection and response (the "Specific Objections") as if fully set forth therein:

1. Defendant objects to Requests as violative of Rule 4:11(e)(1), which prohibits parties from serving more than 30 requests for admission, including all parts and subparts, that do not relate to the genuineness of documents, without leave of Court. Plaintiff's First Requests for Admission consist of 157 requests for admission, more than 5 times the number permitted, in flagrant violation of the Rules. (In contrast, Defendant served only 15 Requests for Admission on Plaintiff.)

2. Defendant objects to the Requests to the extent they purport to call for information that: (a) is subject to the attorney-client privilege; (b) constitutes attorney work product; (c) includes information protected from disclosure based on common interest or a similar privilege; or (d) is otherwise protected from disclosure under applicable privilege, law, or rule. Defendant will not provide such information in response to the Requests, and any inadvertent provision thereof shall not be deemed a waiver of any privilege with respect to such information.

3. Defendant objects to the Requests to the extent that they are vague and ambiguous and to the extent that they seek irrelevant information for which identification, collection, and review would be disproportionate to the needs of the case.

4. Defendant's responses to the Requests are made to the best of Defendant's present knowledge, information, and belief. These Responses are at all times subject to such additional or different information that discovery or further investigation may disclose and, while based on the present state of Defendant's knowledge and investigation, are subject to such additional knowledge of facts as may result from further discovery or investigation.

5. Defendant reserves all objections and rights with respect to the competency, relevance, materiality, privilege, or admissibility of Defendant's responses herein as evidence in any subsequent proceeding in, or hearing in connection with, this or any other action, for any purpose whatsoever.

SPECIFIC OBJECTIONS AND RESPONSES

1. Admit that you are paying the legal fees and expenses for Joshua Drew in connection with this Action.

ANSWER: Ms. Heard admits that, given the aggressive questioning by Mr. Depp's counsel, she paid for Joshua Drew to have his own lawyer present in order to make objections on Mr. Drew's behalf in connection with his deposition in this Action.

2. Admit that you are paying the legal fees and expenses for Elizabeth Marz in connection with this Action.

ANSWER: Ms. Heard admits that given the aggressive questioning by Mr. Depp's counsel, she paid for Elizabeth Marz to have her own lawyer present in order to make objections on Ms. Marz's behalf in connection with her deposition in this Action.

3. Admit that you are paying the legal fees and expenses for Ellen Barkin in connection with this Action.

ANSWER: Ms. Heard denies that she is paying legal fees and expenses for Ellen Barkin in connection with this Action.

4. Admit that you are paying the legal fees and expenses for iO Tillett Wright in connection with this Action.

ANSWER: Ms. Heard admits that given the aggressive questioning by Mr. Depp's counsel at depositions, she agreed to pay for iO Tillett Wright to have his own lawyer present in order to make objections on Mr. Wright's behalf in connection with his deposition in this Action.

5. Admit that you are paying the legal fees and expenses for Raquel Pennington in connection with this Action.

ANSWER: Ms. Heard admits that given the aggressive questioning by Mr. Depp's counsel at depositions, she agreed to pay for Raquel Pennington to have her own lawyer present in order to make objections on Ms. Pennington's behalf in connection with her deposition in this Action.

6. Admit that you are paying the legal fees and expenses for Tasya Van Ree in connection with this Action.

ANSWER: Ms. Heard admits that given the aggressive questioning by Mr. Depp's counsel, she paid for Tasya Van Ree to have her own lawyer present in order to make objections on Ms. Van Ree's behalf in connection with her deposition in this Action.

7. Admit that Susman Godfrey LLP represents you in this Action and also represented Ellen Barkin at her deposition in this Action of Friday, November 22, 2019.

ANSWER: Ms. Heard admits that she is represented by Davida Brook at Susman Godfrey LLP's Los Angeles office, and that Ms. Barkin is represented by her longtime attorney, Jacob Buchdahl, at Susman Godfrey LLP's New York office.

8. Admit that you called Mr. Depp a "pussy" while you were married to him.

ANSWER: Ms. Heard admits that, during arguments they had over the course of their relationship, she called Mr. Depp names and that "pussy" could have been one of the words that she used.

9. Admit that during the course of your marriage to Mr. Depp you used marijuana.

ANSWER: Ms. Heard admits that she may have used marijuana once or twice during the course of her marriage to Mr. Depp, but that is in sharp contrast to Mr. Depp, who used marijuana constantly.

10. Admit that during the course of your marriage to Mr. Depp you used illegal drugs.

ANSWER: Ms. Heard admits that she may have used illegal drugs once or twice during the course of her marriage to Mr. Depp, but that is in sharp contrast to Mr. Depp, who used illegal drugs constantly.

11. Admit that during the course of your marriage to Mr. Depp you abused alcohol.

ANSWER: Ms. Heard denies that during the course of her marriage to Mr. Depp she abused alcohol.

12. Admit that you sought treatment for prescription drug abuse during your relationship with Mr. Depp.

ANSWER: Ms. Heard denies that she sought treatment for prescription drug abuse during her relationship with Mr. Depp.

13. Admit that you sought treatment for illegal drug abuse during your relationship with Mr. Depp.

ANSWER: Ms. Heard denies that she sought treatment for illegal drug abuse during her relationship with Mr. Depp.

14. Admit that you sought treatment for alcohol abuse during your relationship with Mr. Depp.

ANSWER: Ms. Heard denies that she sought treatment for alcohol abuse during her relationship with Mr. Depp.

15. Admit that you have physically struck at least one other Romantic Partner of yours.

ANSWER: Ms. Heard denies that she has physically struck at least one other Romantic Partner of hers.

16. Admit that you have been arrested.

ANSWER: Ms. Heard admits that she was arrested 2009 in connection with an incident at the Seattle airport, but notes that the State declined to press charges.

17. Admit that you were arrested in 2009 for committing domestic violence against your then wife Tasya Van Ree.

ANSWER: Ms. Heard admits that she was arrested in 2009 in connection with an incident at the Seattle airport, but denies she was arrested for committing domestic violence and notes that the State declined to press charges.

18. Admit that you were incarcerated in 2009 for committing domestic violence against your then wife Tasya Van Ree.

ANSWER: Ms. Heard admits that she was arrested in 2009 in connection with an incident at the Seattle airport, but denies that she was arrested for committing domestic violence and notes that the State declined to press charges.

19. Admit that you publicly claimed you were actually arrested and incarcerated in 2009 for being “mouthy” with the arresting police officer.

ANSWER: Ms. Heard admits that she was arrested in connection with an incident at the Seattle airport in 2009, and that she stated on Twitter that she and Ms. Van Ree had a peaceful relationship, but that Ms. Heard “did have sh*t timing when I got mouthy with a cop.” Ms. Heard notes that the State declined to press charges.

20. Admit that during your marriage to Mr. Depp you punched Mr. Depp on at least one occasion.

ANSWER: Ms. Heard admits that, while Mr. Depp was threatening to assault her sister, she punched Mr. Depp on one occasion in order to protect her sister.

21. Admit that during your marriage to Mr. Depp you punched Mr. Depp on more than one occasion.

ANSWER: Ms. Heard denies that she punched Mr. Depp on more than one occasion.

22. Admit that during your marriage to Mr. Depp you kicked Mr. Depp on at least one occasion.

ANSWER: Ms. Heard admits that, as time went on during the course of their relationship, when Mr. Depp would violently assault her, Ms. Heard had to use her body and limbs to protect herself from acts of violence and abuse by Mr. Depp.

23. Admit that during your marriage to Mr. Depp you kicked Mr. Depp on more than one occasion.

ANSWER: Ms. Heard denies that she kicked Mr. Depp on more than one occasion.

24. Admit that during your marriage to Mr. Depp you hit Mr. Depp on at least one

occasion.

ANSWER: Ms. Heard admits that, as time went on during the course of their relationship, when Mr. Depp would violently assault her, Ms. Heard had to use her body and limbs to protect herself.

25. Admit that during your marriage to Mr. Depp you hit Mr. Depp on more than one occasion.

ANSWER: Ms. Heard admits that, as time went on during the course of their relationship, when Mr. Depp would violently assault her, Ms. Heard had to use her body and limbs to protect herself.

26. Admit that during your marriage to Mr. Depp, you once threw a can of paint thinner into the head of Mr. Depp on his island in the Bahamas.

ANSWER: Ms. Heard admits that on one occasion, when she was cornered by Mr. Depp and trying to escape an ongoing violent assault, she had to throw a can of paint thinner in Mr. Depp's direction.

27. Admit that during your marriage to Mr. Depp, you threw objects at Mr. Depp's body and head, including heavy bottles, soda cans, burning candles, television remotes, and paint thinner cans.

ANSWER: Ms. Heard admits that, as time went on during the course of their relationship, when Mr. Depp would violently assault her, she had to throw objects in Mr. Depp's direction in an effort to protect herself, but denies that those objects included burning candles.

28. Admit that during your marriage to Mr. Depp, you once kicked a door into Mr. Depp's head.

ANSWER: Ms. Heard denies that she once kicked a door into Mr. Depp's head, but admits that once when Mr. Depp was passed out on the bathroom floor, Ms. Heard forced the bathroom door open in order to prevent Mr. Depp from choking on his own vomit—something that Ms. Heard had to do on more than one occasion during the course of their marriage.

29. Admit that during your marriage to Mr. Depp, you threw a bottle at Mr. Depp that hit and severed part of his finger.

ANSWER: Ms. Heard denies that she threw a bottle at Mr. Depp that hit and severed part of his finger.

30. Admit that you confessed to a third party soon after throwing the bottle that severed part of Mr. Depp's finger that you "were so angry you just lost it" when you threw

the bottle at Mr. Depp.

ANSWER: Ms. Heard denies that she confessed to a third party soon after throwing the bottle that severed part of Mr. Depp's finger that she "were so angry you just lost it" when she threw the bottle at Mr. Depp.

31. Admit that Mr. Depp did not sever part of his own finger.

ANSWER: Defendant objects to this Request on the grounds that it violates Rule 4:11(e)(1), which prohibits Plaintiff from serving more than 30 requests for admission without leave of court.

32. Admit that you punched Mr. Depp's head and face repeatedly after he was late to your birthday party on April 21, 2016.

ANSWER: Defendant objects to this Request on the grounds that it violates Rule 4:11(e)(1), which prohibits Plaintiff from serving more than 30 requests for admission without leave of court.

33. Admit you punched Mr. Depp in the face on December 15, 2015.

ANSWER: Defendant objects to this Request on the grounds that it violates Rule 4:11(e)(1), which prohibits Plaintiff from serving more than 30 requests for admission without leave of court.

34. Admit that during your marriage to Mr. Depp, your friends Elizabeth Marz, Raquel Pennington, and Joshua Drew, and your sister Whitney Heard lived in apartments owned by Plaintiff and Plaintiff did not charge them rent.

ANSWER: Defendant objects to this Request on the grounds that it violates Rule 4:11(e)(1), which prohibits Plaintiff from serving more than 30 requests for admission without leave of court.

35. Admit that during your marriage to Mr. Depp, your friend iO Tillett Wright lived in a house owned by Plaintiff and Plaintiff did not charge him/her rent.

ANSWER: Defendant objects to this Request on the grounds that it violates Rule 4:11(e)(1), which prohibits Plaintiff from serving more than 30 requests for admission without leave of court.

36. Admit that you consulted with your divorce lawyer Samantha Spector before police arrived at Penthouse 1 of the Eastern Columbia Building on May 21, 2016.

ANSWER: Defendant objects to this Request on the grounds that it violates Rule 4:11(e)(1), which prohibits Plaintiff from serving more than 30 requests for admission without

leave of court.

37. Admit that you consulted with your publicist Jodi Gottlieb before police arrived at the Penthouse at the Eastern Columbia Building on May 21, 2016.

ANSWER: Defendant objects to this Request on the grounds that it violates Rule 4:11(e)(1), which prohibits Plaintiff from serving more than 30 requests for admission without leave of court.

38. Admit that you did not donate the entirety of your divorce settlement with Mr. Depp to charity.

ANSWER: Defendant objects to this Request on the grounds that it violates Rule 4:11(e)(1), which prohibits Plaintiff from serving more than 30 requests for admission without leave of court.

39. Admit that Raquel Pennington was hiding in Penthouse 3 of the Eastern Columbia Building when Mr. Depp arrived on May 21, 2016.

ANSWER: Defendant objects to this Request on the grounds that it violates Rule 4:11(e)(1), which prohibits Plaintiff from serving more than 30 requests for admission without leave of court.

40. Admit iO Tillett Wright slapped Raquel Pennington during your wedding weekend in the Bahamas.

ANSWER: Defendant objects to this Request on the grounds that it violates Rule 4:11(e)(1), which prohibits Plaintiff from serving more than 30 requests for admission without leave of court.

41. Admit that you asked Brandon Patterson and Trinity Esparza to communicate with a staff member of *People* magazine.

ANSWER: Defendant objects to this Request on the grounds that it violates Rule 4:11(e)(1), which prohibits Plaintiff from serving more than 30 requests for admission without leave of court.

42. Admit that you were in the presence of Isaac Baruch on one or more occasions between May 22 and May 25, 2016.

ANSWER: Defendant objects to this Request on the grounds that it violates Rule 4:11(e)(1), which prohibits Plaintiff from serving more than 30 requests for admission without leave of court.

43. Admit that you were in the presence of Laura Divenere on one or more occasions between May 22 and May 25, 2016.

ANSWER: Defendant objects to this Request on the grounds that it violates Rule 4:11(e)(1), which prohibits Plaintiff from serving more than 30 requests for admission without leave of court.

44. Admit you confessed to Kevin Murphy defecating on the bed in Penthouse 3 of the Eastern Columbia Building was a "harmless prank."

ANSWER: Defendant objects to this Request on the grounds that it violates Rule 4:11(e)(1), which prohibits Plaintiff from serving more than 30 requests for admission without leave of court.

45. Admit that you met with Cornelius Harrell in the Eastern Columbia Building on May 22, 2016.

ANSWER: Defendant objects to this Request on the grounds that it violates Rule 4:11(e)(1), which prohibits Plaintiff from serving more than 30 requests for admission without leave of court.

46. Admit that you attended Amanda de Cadenet's birthday party on May 22, 2016.

ANSWER: Defendant objects to this Request on the grounds that it violates Rule 4:11(e)(1), which prohibits Plaintiff from serving more than 30 requests for admission without leave of court.

47. Admit that you have been diagnosed with borderline personality disorder.

ANSWER: Defendant objects to this Request on the grounds that it violates Rule 4:11(e)(1), which prohibits Plaintiff from serving more than 30 requests for admission without leave of court.

48. Admit that you never saw a medical doctor or nurse regarding injuries you claimed to have suffered on May 21, 2016.

ANSWER: Defendant objects to this Request on the grounds that it violates Rule 4:11(e)(1), which prohibits Plaintiff from serving more than 30 requests for admission without leave of court.

49. Admit that you never saw a medical doctor or nurse regarding injuries you claimed to have suffered on December 15, 2015.

ANSWER: Defendant objects to this Request on the grounds that it violates Rule 4:11(e)(1), which prohibits Plaintiff from serving more than 30 requests for admission without leave of court.

50. Admit that Mr. Depp did not harmfully touch you the night before you taped the James Corden show on December 16, 2015.

ANSWER: Defendant objects to this Request on the grounds that it violates Rule 4:11(e)(1), which prohibits Plaintiff from serving more than 30 requests for admission without leave of court.

51. Admit you worked with Samantha McMillen on December 16, 2015 prior to the James Corden Show taping.

ANSWER: Defendant objects to this Request on the grounds that it violates Rule 4:11(e)(1), which prohibits Plaintiff from serving more than 30 requests for admission without leave of court.

52. Admit that you represented to the US Government in a letter that Samantha McMillen was merely your "friend" and not your assistant.

ANSWER: Defendant objects to this Request on the grounds that it violates Rule 4:11(e)(1), which prohibits Plaintiff from serving more than 30 requests for admission without leave of court.

53. Admit you violently attacked Mr. Depp in the Bahamas in 2014.

ANSWER: Defendant objects to this Request on the grounds that it violates Rule 4:11(e)(1), which prohibits Plaintiff from serving more than 30 requests for admission without leave of court.

54. Admit that in your wedding vows, you promised to be faithful to Johnny Depp.

ANSWER: Defendant objects to this Request on the grounds that it violates Rule 4:11(e)(1), which prohibits Plaintiff from serving more than 30 requests for admission without leave of court.

55. Admit that you had a sexual relationship with at least one other person while married to Mr. Depp.

ANSWER: Defendant objects to this Request on the grounds that it violates Rule 4:11(e)(1), which prohibits Plaintiff from serving more than 30 requests for admission without leave of court.

56. Admit that you had a sexual relationship with more than one other person while married to Mr. Depp.

ANSWER: Defendant objects to this Request on the grounds that it violates Rule 4:11(e)(1), which prohibits Plaintiff from serving more than 30 requests for admission without leave of court.

57. Admit that you had other Romantic Partners while married to Mr. Depp.

ANSWER: Defendant objects to this Request on the grounds that it violates Rule 4:11(e)(1), which prohibits Plaintiff from serving more than 30 requests for admission without leave of court.

58. Admit that you had sexual relations with Cara Delevingne while still married to Mr. Depp.

ANSWER: Defendant objects to this Request on the grounds that it violates Rule 4:11(e)(1), which prohibits Plaintiff from serving more than 30 requests for admission without leave of court.

59. Admit that Elon Musk came up to Mr. Depp's penthouse at the Eastern Columbia Building in March 2015.

ANSWER: Defendant objects to this Request on the grounds that it violates Rule 4:11(e)(1), which prohibits Plaintiff from serving more than 30 requests for admission without leave of court.

60. Admit that you had sexual relations with Elon Musk while still married to Mr. Depp.

ANSWER: Defendant objects to this Request on the grounds that it violates Rule 4:11(e)(1), which prohibits Plaintiff from serving more than 30 requests for admission without leave of court.

61. Admit that you never disclosed to Johnny Depp prior to your divorce from him that you had sexual relations with Elon Musk while still married to Johnny Depp.

ANSWER: Defendant objects to this Request on the grounds that it violates Rule 4:11(e)(1), which prohibits Plaintiff from serving more than 30 requests for admission without leave of court.

62. Admit that you never disclosed to Mr. Depp prior to your divorce from him that you had sex with Cara Delevingne while still married to Mr. Depp.

ANSWER: Defendant objects to this Request on the grounds that it violates Rule 4:11(e)(1), which prohibits Plaintiff from serving more than 30 requests for admission without leave of court.

63. Admit that James Franco came to Mr. Depp's penthouse at the Eastern Columbia Building on or after May 21, 2016.

ANSWER: Defendant objects to this Request on the grounds that it violates Rule 4:11(e)(1), which prohibits Plaintiff from serving more than 30 requests for admission without leave of court.

64. Admit that James Franco came to Mr. Depp's penthouse at the Eastern

Columbia Building before May 21, 2016.

ANSWER: Defendant objects to this Request on the grounds that it violates Rule 4:11(e)(1), which prohibits Plaintiff from serving more than 30 requests for admission without leave of court.

65. Admit that you had sexual relations with James Franco while still married to Mr. Depp.

ANSWER: Defendant objects to this Request on the grounds that it violates Rule 4:11(e)(1), which prohibits Plaintiff from serving more than 30 requests for admission without leave of court.

66. Admit that you never disclosed to Mr. Depp prior to your divorce from him that you had sex with James Franco while still married to Mr. Depp.

ANSWER: Defendant objects to this Request on the grounds that it violates Rule 4:11(e)(1), which prohibits Plaintiff from serving more than 30 requests for admission without leave of court.

67. Admit that you traveled to or through either Dulles International Airport or Ronald Reagan Washington National Airport prior to April 10, 2019.

ANSWER: Defendant objects to this Request on the grounds that it violates Rule 4:11(e)(1), which prohibits Plaintiff from serving more than 30 requests for admission without leave of court.

68. Admit that Mr. Depp has never physically harmed you.

ANSWER: Defendant objects to this Request on the grounds that it violates Rule 4:11(e)(1), which prohibits Plaintiff from serving more than 30 requests for admission without leave of court.

69. Admit that Mr. Depp has never intended to physically harm you.

ANSWER: Defendant objects to this Request on the grounds that it violates Rule 4:11(e)(1), which prohibits Plaintiff from serving more than 30 requests for admission without leave of court.

70. Admit that no third person has witnessed Mr. Depp in the act of physically harming you.

ANSWER: Defendant objects to this Request on the grounds that it violates Rule 4:11(e)(1), which prohibits Plaintiff from serving more than 30 requests for admission without leave of court.

71. Admit that you are unaware of any third person witnessing Mr. Depp in the

act of physically harming you.

ANSWER: Defendant objects to this Request on the grounds that it violates Rule 4:11(e)(1), which prohibits Plaintiff from serving more than 30 requests for admission without leave of court.

72. Admit that no photographs show Mr. Depp in the act of physically harming you.

ANSWER: Defendant objects to this Request on the grounds that it violates Rule 4:11(e)(1), which prohibits Plaintiff from serving more than 30 requests for admission without leave of court.

73. Admit that you are unaware of any photographs that show Mr. Depp in the act of physically harming you.

ANSWER: Defendant objects to this Request on the grounds that it violates Rule 4:11(e)(1), which prohibits Plaintiff from serving more than 30 requests for admission without leave of court.

74. Admit that no video recordings show Mr. Depp in the act of physically harming you.

ANSWER: Defendant objects to this Request on the grounds that it violates Rule 4:11(e)(1), which prohibits Plaintiff from serving more than 30 requests for admission without leave of court.

75. Admit that you are unaware of any video recordings showing Mr. Depp in the act of physically harming you.

ANSWER: Defendant objects to this Request on the grounds that it violates Rule 4:11(e)(1), which prohibits Plaintiff from serving more than 30 requests for admission without leave of court.

76. Admit that no audio recordings exist of any incident of Mr. Depp in the act of physically harming you.

ANSWER: Defendant objects to this Request on the grounds that it violates Rule 4:11(e)(1), which prohibits Plaintiff from serving more than 30 requests for admission without leave of court.

77. Admit that you are unaware of any audio recordings of Mr. Depp in the act of physically harming you.

ANSWER: Defendant objects to this Request on the grounds that it violates Rule 4:11(e)(1), which prohibits Plaintiff from serving more than 30 requests for admission without leave of court.

78. Admit that Mr. Depp has never told you that he physically harmed you.

ANSWER: Defendant objects to this Request on the grounds that it violates Rule 4:11(e)(1), which prohibits Plaintiff from serving more than 30 requests for admission without leave of court.

79. Admit that Mr. Depp has never told any third person that he physically harmed you.

ANSWER: Defendant objects to this Request on the grounds that it violates Rule 4:11(e)(1), which prohibits Plaintiff from serving more than 30 requests for admission without leave of court.

80. Admit that you are unaware of any instance where Mr. Depp told any third person that he physically harmed you.

ANSWER: Defendant objects to this Request on the grounds that it violates Rule 4:11(e)(1), which prohibits Plaintiff from serving more than 30 requests for admission without leave of court.

81. Admit that Mr. Depp has never admitted in writing that he has physically harmed you.

ANSWER: Defendant objects to this Request on the grounds that it violates Rule 4:11(e)(1), which prohibits Plaintiff from serving more than 30 requests for admission without leave of court.

82. Admit that you are unaware of any instance where Mr. Depp admitted in writing that he physically harmed you.

ANSWER: Defendant objects to this Request on the grounds that it violates Rule 4:11(e)(1), which prohibits Plaintiff from serving more than 30 requests for admission without leave of court.

83. Admit that Mr. Depp has never sexually assaulted you.

ANSWER: Defendant objects to this Request on the grounds that it violates Rule 4:11(e)(1), which prohibits Plaintiff from serving more than 30 requests for admission without leave of court.

84. Admit that you have never asserted that Mr. Depp has sexually assaulted you.

ANSWER: Defendant objects to this Request on the grounds that it violates Rule 4:11(e)(1), which prohibits Plaintiff from serving more than 30 requests for admission without leave of court.

85. Admit that no third person has witnessed Mr. Depp in the act of sexually assaulting you.

ANSWER: Defendant objects to this Request on the grounds that it violates Rule 4:11(e)(1), which prohibits Plaintiff from serving more than 30 requests for admission without leave of court.

86. Admit that you are unaware of any third person witnessing Mr. Depp in the act of sexually assaulting you.

ANSWER: Defendant objects to this Request on the grounds that it violates Rule 4:11(e)(1), which prohibits Plaintiff from serving more than 30 requests for admission without leave of court

87. Admit that no photographs show Mr. Depp in the act of sexually assaulting you.

ANSWER: Defendant objects to this Request on the grounds that it violates Rule 4:11(e)(1), which prohibits Plaintiff from serving more than 30 requests for admission without leave of court.

88. Admit that you are unaware of any photographs that show Mr. Depp in the act of sexually assaulting you.

ANSWER: Defendant objects to this Request on the grounds that it violates Rule 4:11(e)(1), which prohibits Plaintiff from serving more than 30 requests for admission without leave of court.

89. Admit that no video recordings show Mr. Depp in the act of sexually assaulting you.

ANSWER: Defendant objects to this Request on the grounds that it violates Rule 4:11(e)(1), which prohibits Plaintiff from serving more than 30 requests for admission without leave of court.

90. Admit that you are unaware of any video recordings showing Mr. Depp in the act of sexually assaulting you.

ANSWER: Defendant objects to this Request on the grounds that it violates Rule 4:11(e)(1), which prohibits Plaintiff from serving more than 30 requests for admission without leave of court.

91. Admit that no audio recordings exist of any incident of Mr. Depp in the act of sexually assaulting you.

ANSWER: Defendant objects to this Request on the grounds that it violates Rule 4:11(e)(1), which prohibits Plaintiff from serving more than 30 requests for admission without leave of court.

92. Admit that you are unaware of any audio recordings of Mr. Depp in the act of sexually assaulting you.

ANSWER: Defendant objects to this Request on the grounds that it violates Rule 4:11(e)(1), which prohibits Plaintiff from serving more than 30 requests for admission without leave of court.

93. Admit that Mr. Depp has never told you that he sexually assaulted you.

ANSWER: Defendant objects to this Request on the grounds that it violates Rule 4:11(e)(1), which prohibits Plaintiff from serving more than 30 requests for admission without leave of court.

94. Admit that Mr. Depp has never told any third person that he sexually assaulted you.

ANSWER: Defendant objects to this Request on the grounds that it violates Rule 4:11(e)(1), which prohibits Plaintiff from serving more than 30 requests for admission without leave of court.

95. Admit that you are unaware of any instance where Mr. Depp told any third person that he sexually assaulted you.

ANSWER: Defendant objects to this Request on the grounds that it violates Rule 4:11(e)(1), which prohibits Plaintiff from serving more than 30 requests for admission without leave of court.

96. Admit that Mr. Depp has never admitted in writing that he has sexually assaulted you.

ANSWER: Defendant objects to this Request on the grounds that it violates Rule 4:11(e)(1), which prohibits Plaintiff from serving more than 30 requests for admission without leave of court.

97. Admit that you are unaware of any instance where Mr. Depp admitted in writing that he sexually assaulted you.

ANSWER: Defendant objects to this Request on the grounds that it violates Rule 4:11(e)(1), which prohibits Plaintiff from serving more than 30 requests for admission without leave of court.

98. Admit that Mr. Depp has never physically harmed a third person who was a Romantic Partner of his.

ANSWER: Defendant objects to this Request on the grounds that it violates Rule 4:11(e)(1), which prohibits Plaintiff from serving more than 30 requests for admission without leave of court.

99. Admit that you are unaware of a third person Romantic Partner of Mr. Depp's who he has physically harmed.

ANSWER: Defendant objects to this Request on the grounds that it violates Rule 4:11(e)(1), which prohibits Plaintiff from serving more than 30 requests for admission without leave of court.

100. Admit that no third person who was a Romantic Partner of Mr. Depp has claimed that Mr. Depp physically harmed her.

ANSWER: Defendant objects to this Request on the grounds that it violates Rule 4:11(e)(1), which prohibits Plaintiff from serving more than 30 requests for admission without leave of court.

101. Admit that you are unaware of any third person who was a Romantic Partner of Mr. Depp claiming that Mr. Depp physically assaulted her.

ANSWER: Defendant objects to this Request on the grounds that it violates Rule 4:11(e)(1), which prohibits Plaintiff from serving more than 30 requests for admission without leave of court.

102. Admit that no third person has witnessed Mr. Depp physically harming a third person who was a Romantic Partner of his.

ANSWER: Defendant objects to this Request on the grounds that it violates Rule 4:11(e)(1), which prohibits Plaintiff from serving more than 30 requests for admission without leave of court.

103. Admit that you are unaware of any third person witnessing Mr. Depp in the act of physically harming a third person who was a Romantic Partner of his.

ANSWER: Defendant objects to this Request on the grounds that it violates Rule 4:11(e)(1), which prohibits Plaintiff from serving more than 30 requests for admission without leave of court.

104. Admit that no photographs show Mr. Depp in the act of physically harming a third person who was a Romantic Partner of his.

ANSWER: Defendant objects to this Request on the grounds that it violates Rule 4:11(e)(1), which prohibits Plaintiff from serving more than 30 requests for admission without leave of court.

105. Admit that you are unaware of any photographs that show Mr. Depp in the act of physically harming a third person who was a Romantic Partner of his.

ANSWER: Defendant objects to this Request on the grounds that it violates Rule 4:11(e)(1), which prohibits Plaintiff from serving more than 30 requests for admission without leave of court.

106. Admit that no video recordings show Mr. Depp physically harming a third person who was a Romantic Partner of his.

ANSWER: Defendant objects to this Request on the grounds that it violates Rule 4:11(e)(1), which prohibits Plaintiff from serving more than 30 requests for admission without leave of court.

107. Admit that you are unaware of any video recordings showing Mr. Depp physically harming a third person who was a Romantic Partner of his.

ANSWER: Defendant objects to this Request on the grounds that it violates Rule 4:11(e)(1), which prohibits Plaintiff from serving more than 30 requests for admission without leave of court.

108. Admit that no audio recordings exist of any incident of Mr. Depp physically harming a third person who was a Romantic Partner of his.

ANSWER: Defendant objects to this Request on the grounds that it violates Rule 4:11(e)(1), which prohibits Plaintiff from serving more than 30 requests for admission without leave of court.

109. Admit that you are unaware of any audio recordings of Mr. Depp physically harming a third person who was a Romantic Partner of his.

ANSWER: Defendant objects to this Request on the grounds that it violates Rule 4:11(e)(1), which prohibits Plaintiff from serving more than 30 requests for admission without leave of court.

110. Admit that Mr. Depp has never told you that he physically harmed a third person who was a Romantic Partner of his.

ANSWER: Defendant objects to this Request on the grounds that it violates Rule 4:11(e)(1), which prohibits Plaintiff from serving more than 30 requests for admission without leave of court.

111. Admit that Mr. Depp has never told any third person that he physically harmed a third person who was a Romantic Partner of his.

ANSWER: Defendant objects to this Request on the grounds that it violates Rule 4:11(e)(1), which prohibits Plaintiff from serving more than 30 requests for admission without leave of court.

112. Admit that you are unaware of any instance where Mr. Depp told any third person that he physically harmed a third person who was a Romantic Partner of his.

ANSWER: Defendant objects to this Request on the grounds that it violates Rule 4:11(e)(1), which prohibits Plaintiff from serving more than 30 requests for admission without leave of court.

113. Admit that Mr. Depp has never admitted in writing that he has physically harmed a third person who was a Romantic Partner of his.

ANSWER: Defendant objects to this Request on the grounds that it violates Rule 4:11(e)(1), which prohibits Plaintiff from serving more than 30 requests for admission without leave of court.

114. Admit that you are unaware of any instance where Mr. Depp admitted in writing that he physically harmed a third person who was a Romantic Partner of his.

ANSWER: Defendant objects to this Request on the grounds that it violates Rule 4:11(e)(1), which prohibits Plaintiff from serving more than 30 requests for admission without leave of court.

115. Admit that no third person who was a Romantic Partner of Mr. Depp has claimed that Mr. Depp physically harmed her.

ANSWER: Defendant objects to this Request on the grounds that it violates Rule 4:11(e)(1), which prohibits Plaintiff from serving more than 30 requests for admission without leave of court.

116. Admit that you are unaware of any third person who was a Romantic Partner of Mr. Depp claiming that Mr. Depp physically harmed her.

ANSWER: Defendant objects to this Request on the grounds that it violates Rule 4:11(e)(1), which prohibits Plaintiff from serving more than 30 requests for admission without leave of court.

117. Admit that Mr. Depp has never sexually assaulted a third person who was a Romantic Partner of his.

ANSWER: Defendant objects to this Request on the grounds that it violates Rule 4:11(e)(1), which prohibits Plaintiff from serving more than 30 requests for admission without leave of court.

118. Admit that no third person has witnessed Mr. Depp sexually assaulting a third person who was a Romantic Partner of his.

ANSWER: Defendant objects to this Request on the grounds that it violates Rule 4:11(e)(1), which prohibits Plaintiff from serving more than 30 requests for admission without leave of court.

119. Admit that you are unaware of any third person witnessing Mr. Depp sexually assaulting a third person who was a Romantic Partner of his.

ANSWER: Defendant objects to this Request on the grounds that it violates Rule 4:11(e)(1), which prohibits Plaintiff from serving more than 30 requests for admission without leave of court.

120. Admit that no photographs show Mr. Depp sexually assaulting a third person who was a Romantic Partner of his.

ANSWER: Defendant objects to this Request on the grounds that it violates Rule 4:11(e)(1), which prohibits Plaintiff from serving more than 30 requests for admission without leave of court.

121. Admit that you are unaware of any photographs that show Mr. Depp sexually assaulting a third person who was a Romantic Partner of his.

ANSWER: Defendant objects to this Request on the grounds that it violates Rule 4:11(e)(1), which prohibits Plaintiff from serving more than 30 requests for admission without leave of court.

122. Admit that no video recordings show Mr. Depp sexually assaulting a third person who was a Romantic Partner of his.

ANSWER: Defendant objects to this Request on the grounds that it violates Rule 4:11(e)(1), which prohibits Plaintiff from serving more than 30 requests for admission without leave of court.

123. Admit that you are unaware of any video recordings showing Mr. Depp sexually assaulting a third person who was a Romantic Partner of his.

ANSWER: Defendant objects to this Request on the grounds that it violates Rule 4:11(e)(1), which prohibits Plaintiff from serving more than 30 requests for admission without leave of court.

124. Admit that no audio recordings exist of any incident of Mr. Depp sexually assaulting a third person who was a Romantic Partner of his.

ANSWER: Defendant objects to this Request on the grounds that it violates Rule 4:11(e)(1), which prohibits Plaintiff from serving more than 30 requests for admission without leave of court.

125. Admit that you are unaware of any audio recordings of Mr. Depp sexually assaulting a third person who was a Romantic Partner of his.

ANSWER: Defendant objects to this Request on the grounds that it violates Rule

4:11(e)(1), which prohibits Plaintiff from serving more than 30 requests for admission without leave of court.

126. Admit that Mr. Depp has never told you that he sexually assaulted a third person who was a Romantic Partner of his.

ANSWER: Defendant objects to this Request on the grounds that it violates Rule 4:11(e)(1), which prohibits Plaintiff from serving more than 30 requests for admission without leave of court.

127. Admit that Mr. Depp has never told any third person that he sexually assaulted a third person who was a Romantic Partner of his.

ANSWER: Defendant objects to this Request on the grounds that it violates Rule 4:11(e)(1), which prohibits Plaintiff from serving more than 30 requests for admission without leave of court.

128. Admit that you are unaware of any instance where Mr. Depp told any third person that he sexually assaulted a third person who was a Romantic Partner of his.

ANSWER: Defendant objects to this Request on the grounds that it violates Rule 4:11(e)(1), which prohibits Plaintiff from serving more than 30 requests for admission without leave of court.

129. Admit that Mr. Depp has never admitted in writing that he has sexually assaulted a third person who was a Romantic Partner of his.

ANSWER: Defendant objects to this Request on the grounds that it violates Rule 4:11(e)(1), which prohibits Plaintiff from serving more than 30 requests for admission without leave of court.

130. Admit that you are unaware of any instance where Mr. Depp admitted in writing that he sexually assaulted a third person who was a Romantic Partner of his.

ANSWER: Defendant objects to this Request on the grounds that it violates Rule 4:11(e)(1), which prohibits Plaintiff from serving more than 30 requests for admission without leave of court.

131. Admit that no third person who was a Romantic Partner of Mr. Depp has claimed that Mr. Depp sexually assaulted her.

ANSWER: Defendant objects to this Request on the grounds that it violates Rule 4:11(e)(1), which prohibits Plaintiff from serving more than 30 requests for admission without leave of court.

132. Admit that you are unaware of any third person who was a Romantic Partner of Mr. Depp claiming that Mr. Depp sexually assaulted her.

ANSWER: Defendant objects to this Request on the grounds that it violates Rule 4:11(e)(1), which prohibits Plaintiff from serving more than 30 requests for admission without leave of court.

133. Admit that you have never sought medical treatment for any injuries that you claim were caused by Mr. Depp.

ANSWER: Defendant objects to this Request on the grounds that it violates Rule 4:11(e)(1), which prohibits Plaintiff from serving more than 30 requests for admission without leave of court.

134. Admit that you have never received medical treatment for any injuries that you claim were caused by Mr. Depp.

ANSWER: Defendant objects to this Request on the grounds that it violates Rule 4:11(e)(1), which prohibits Plaintiff from serving more than 30 requests for admission without leave of court.

135. Admit that you have never sought medical treatment relating to any sexual assault you claim was committed by Mr. Depp.

ANSWER: Defendant objects to this Request on the grounds that it violates Rule 4:11(e)(1), which prohibits Plaintiff from serving more than 30 requests for admission without leave of court.

136. Admit that you have never received medical treatment relating to any sexual assault you claim was committed by Mr. Depp.

ANSWER: Defendant objects to this Request on the grounds that it violates Rule 4:11(e)(1), which prohibits Plaintiff from serving more than 30 requests for admission without leave of court.

137. Admit that you have never sought psychological treatment for any physical injuries you claim were caused by Mr. Depp.

ANSWER: Defendant objects to this Request on the grounds that it violates Rule 4:11(e)(1), which prohibits Plaintiff from serving more than 30 requests for admission without leave of court.

138. Admit that you have never received psychological treatment for any physical injuries you claim were caused by Mr. Depp.

ANSWER: Defendant objects to this Request on the grounds that it violates Rule 4:11(e)(1), which prohibits Plaintiff from serving more than 30 requests for admission without leave of court.

139. Admit that after you and Mr. Depp divorced, you withdrew your allegations that Mr. Depp abused you.

ANSWER: Defendant objects to this Request on the grounds that it violates Rule 4:11(e)(1), which prohibits Plaintiff from serving more than 30 requests for admission without leave of court.

140. Admit that after you and Mr. Depp divorced, you issued a statement that your and Mr. Depp's relationship was intensely passionate and at times volatile, but always bound by love.

ANSWER: Defendant objects to this Request on the grounds that it violates Rule 4:11(e)(1), which prohibits Plaintiff from serving more than 30 requests for admission without leave of court.

141. Admit that after you and Mr. Depp divorced, you issued a statement that in your and Mr. Depp's relationship there was never any intent of physical or emotional harm.

ANSWER: Defendant objects to this Request on the grounds that it violates Rule 4:11(e)(1), which prohibits Plaintiff from serving more than 30 requests for admission without leave of court.

142. Admit that you drafted the Op-ed.

ANSWER: Defendant objects to this Request on the grounds that it violates Rule 4:11(e)(1), which prohibits Plaintiff from serving more than 30 requests for admission without leave of court.

143. Admit that you approved the final version of the Op-ed prior to publication.

ANSWER: Defendant objects to this Request on the grounds that it violates Rule 4:11(e)(1), which prohibits Plaintiff from serving more than 30 requests for admission without leave of court.

144. Admit that you approved the title of the Op-ed prior to publication.

ANSWER: Defendant objects to this Request on the grounds that it violates Rule 4:11(e)(1), which prohibits Plaintiff from serving more than 30 requests for admission without leave of court.

145. Admit that in the Op-Ed, you claimed you became a public figure representing domestic abuse.

ANSWER: Defendant objects to this Request on the grounds that it violates Rule

4:11(e)(1), which prohibits Plaintiff from serving more than 30 requests for admission without leave of court.

146. Admit that the domestic abuse you referred to in the Op-Ed was your claim that Mr. Depp abused you.

ANSWER: Defendant objects to this Request on the grounds that it violates Rule 4:11(e)(1), which prohibits Plaintiff from serving more than 30 requests for admission without leave of court.

147. Admit that readers of the Op-Ed understood that your Op-Ed was referring to Mr. Depp.

ANSWER: Defendant objects to this Request on the grounds that it violates Rule 4:11(e)(1), which prohibits Plaintiff from serving more than 30 requests for admission without leave of court.

148. Admit that readers of the Op-Ed understood that your Op-Ed was referring to your claim that Mr. Depp abused you.

ANSWER: Defendant objects to this Request on the grounds that it violates Rule 4:11(e)(1), which prohibits Plaintiff from serving more than 30 requests for admission without leave of court.

149. Admit that other media sources reported that the Op-Ed was understood to be referring to your claim that Mr. Depp abused you.

ANSWER: Defendant objects to this Request on the grounds that it violates Rule 4:11(e)(1), which prohibits Plaintiff from serving more than 30 requests for admission without leave of court.

150. Admit that you have publicly claimed that Mr. Depp committed domestic abuse against you.

ANSWER: Defendant objects to this Request on the grounds that it violates Rule 4:11(e)(1), which prohibits Plaintiff from serving more than 30 requests for admission without leave of court.

151. Admit that after the Op-Ed was published, Disney announced that Mr. Depp no longer would play the role of Captain Jack Sparrow in future *Pirates of the Caribbean* films.

ANSWER: Defendant objects to this Request on the grounds that it violates Rule 4:11(e)(1), which prohibits Plaintiff from serving more than 30 requests for admission without leave of court.

152. Admit that the Op-Ed was a substantial cause of Disney firing Mr. Depp from future

Pirates of the Caribbean films.

ANSWER: Defendant objects to this Request on the grounds that it violates Rule 4:11(e)(1), which prohibits Plaintiff from serving more than 30 requests for admission without leave of court.

153. Admit that Mr. Depp's income from films has declined since the publication of the Op- Ed.

ANSWER: Defendant objects to this Request on the grounds that it violates Rule 4:11(e)(1), which prohibits Plaintiff from serving more than 30 requests for admission without leave of court.

154. Admit that the public service announcement you made with Girlgaze in November 2016 about "this" was about abuse you claim to have suffered.

ANSWER: Defendant objects to this Request on the grounds that it violates Rule 4:11(e)(1), which prohibits Plaintiff from serving more than 30 requests for admission without leave of court.

155. Admit that when you said "when it happens behind closed doors, with someone you love" in the Girlgaze PSA, you were referring to Mr. Depp.

ANSWER: Defendant objects to this Request on the grounds that it violates Rule 4:11(e)(1), which prohibits Plaintiff from serving more than 30 requests for admission without leave of court.

156. Admit that other individuals besides you are funding your legal expenses in this lawsuit.

ANSWER: Defendant objects to this Request on the grounds that it violates Rule 4:11(e)(1), which prohibits Plaintiff from serving more than 30 requests for admission without leave of court.

157. Admit that other organizations are funding your legal expenses in this lawsuit.

ANSWER: Defendant objects to this Request on the grounds that it violates Rule 4:11(e)(1), which prohibits Plaintiff from serving more than 30 requests for admission without leave of court.

December 30, 2019

Respectfully submitted,
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CERTIFICATE OF SERVICE

I certify that on this 30th day of December 2019, a copy of the foregoing was served by email and first class mail, postage prepaid upon:

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