

SUPREME COURT OF THE STATE OF NEW YORK
COUNTY OF NEW YORK

----- :
JOHN C. DEPP, II, :

Petitioner, :

v. :

AMERICAN CIVIL LIBERTIES UNION
FOUNDATION, BENJAMIN WIZNER, and
ANTHONY ROMERO,

Respondents.
----- :

Index No. 154545/2021

Part 37

Hon. Arthur F. Engoron

Motion Sequence No. 004

AFFIRMATION OF STEPHANIE TEPLIN

Stephanie Teplin, an attorney duly admitted to practice law in the State of New York,
hereby affirms as follows:

1. I am a partner at Patterson Belknap Webb & Tyler LLP (“Patterson Belknap”) and am counsel for the American Civil Liberties Union Foundation (“ACLU”), Benjamin Wizner, and Anthony Romero (together, the “ACLU Non-Parties”) in the above-captioned action. I am fully familiar with the facts and circumstances herein.

2. I submit this affirmation in further support of the ACLU Non-Parties’ Motion for Production Expenses Pursuant to CPLR 3111 and 3122(d).

3. On November 11, 2021, my colleague responded by email to the November 8, 2021 email from Mr. Depp’s counsel challenging the assertion of the common interest privilege. (*See Meyers Aff.* ¶ 5.) The ACLU Non-Parties’ responsive email provided the basis and legal citations supporting the privilege assertions. Mr. Depp’s counsel did not respond.

Dated: New York, New York
June 14, 2022

/s/ Stephanie Teplin

Stephanie Teplin

CERTIFICATE OF COMPLIANCE

I hereby certify that this affirmation is 147 words exclusive of the caption and signature block, and that this document complies with the word limit for an affirmation.

Dated: June 14, 2022

/s/ Stephanie Teplin

Stephanie Teplin