

EXHIBIT 25

VIRGINIA :

IN THE CIRCUIT COURT OF FAIRFAX COUNTY

JOHN C. DEPP, II,

Plaintiff and Counterclaim Defendant,

v.

AMBER LAURA HEARD,

Defendant and Counterclaim Plaintiff.

Civil Action No.: CL-2019-0002911

**DEFENDANT AND COUNTERCLAIM PLAINTIFF AMBER LAURA HEARD'S
OBJECTIONS TO PLAINTIFF AND COUNTERCLAIM DEFENDANT'S
DEPOSITION SUBPOENA ISSUED TO BENJAMIN WIZNER**

NOTICE IS HEREBY GIVEN that Defendant and Counterclaim Plaintiff AMBER LAURA HEARD hereby objects to Plaintiff and Counterclaim Defendant JOHN C. DEPP, II's ("Mr. Depp") Subpoena to Person Under Foreign Subpoena, commanding non-party Benjamin Wizner ("Mr. Wizner") to attend and give testimony at a deposition ("Subpoena") on March 8, 2021 beginning at 9:30 A.M.

OBJECTIONS TO DEPOSITION SUBPOENA

1. Defendant and Counterclaim Plaintiff objects to the Subpoena to the extent that Mr. Depp failed to comply with the service requirements of the state of New York, including but not limited to CPLR 2103(a), CPLR 311, and/or CPLR 308.

2. Defendant and Counterclaim Plaintiff objects to the Subpoena on the grounds that the deposition of Mr. Wizner was unilaterally set for March 8, 2021, without first consulting counsel for Ms. Heard and was further set on a date another deposition in this case is already scheduled to be taken. Dates for depositions need to be coordinated, and proposed dates for the depositions need to be discussed among parties and their counsel so that dates mutually

convenient for the deponent and counsel may be selected. Defendant and Counterclaim Plaintiff therefore requests that, to the extent a deposition is deemed appropriate, the date of Mr. Wizner's deposition be changed to a mutually agreeable time and date.

3. Defendant and Counterclaim Plaintiff objects to the Subpoena on the grounds that there is no legitimate reason for deposing Mr. Wizner. He has not been listed in either party's Interrogatories as a person possessing knowledge, and the sole knowledge Mr. Wizner would have relates to the Declaration he provided during the briefing of an issue under the Anti-SLAPP provision. The Declaration was Attachment 7 to Defendant and Counterclaim Plaintiff's Opposition to the Plea in Bar, and the Motion was argued to the Court on January 29, 2021, with a decision pending. The issue has already been fully submitted to the Court, and Counsel for Mr. Depp did not address the Declaration in his Reply brief or at the oral hearing. It therefore appears that the deposition has been noticed solely for the purpose of harassing both Mr. Wizner and Defendant and Counterclaim Plaintiff, and to punish Mr. Wizner for providing a Declaration in support of Ms. Heard in this case.

4. Defendant and Counterclaim Plaintiff objects to the Subpoena to the extent it seeks testimony or information that may be obtained from a party to this action through the use of permissible discovery practices, is already in Plaintiff and Counterclaim Defendant's possession, custody, or control, is publicly available, or is otherwise independently available to Plaintiff and Counterclaim Defendant.

5. Defendant and Counterclaim Plaintiff objects to the Subpoena to the extent Plaintiff and Counterclaim Defendant seeks testimony that is not within Mr. Wizner's personal knowledge, custody, or control.

6. Defendant and Counterclaim Plaintiff objects to the Subpoena because it constitutes an improper fishing expedition so overbroad in scope and time as to be burdensome and harassing, and is not sufficiently and narrowly-tailored nor reasonably calculated to lead to the discovery of admissible evidence, and to the extent the Subpoena seeks information that the Fairfax County Circuit Court has already ruled is overbroad, unduly burdensome, and beyond the scope of discovery in the case.

7. Defendant and Counterclaim Plaintiff objects to the Subpoena to the extent it may call for testimony of a confidential nature, or for constitutionally-protected, private information.

8. Defendant and Counterclaim Plaintiff objects to the Subpoena to the extent it imposes obligations or requirements on Mr. Wizner in excess of or different from those imposed by Va. Sup. Ct. Rs. 4:1(b), 4:5, and 4:9A, and all other applicable laws or Rules.

9. Defendant and Counterclaim Plaintiff does not waive, and expressly reserves, her right to move to quash, modify, or limit the Subpoena, or in the alternative, to move for an order of protection.

10. Defendant and Counterclaim Plaintiff reserves the right to raise further objections to the Subpoena.

11. Defendant and Counterclaim Plaintiff expressly reserves all objections to the confidentiality, admissibility, authenticity, or relevancy of any testimony provided, and reserves all applicable claims of privilege.

12. Defendant and Counterclaim Plaintiff expressly reserves all rights and privileges under the Rules of Evidence, Rules regarding discovery, and any other applicable laws or Rules. The failure to assert such rights and privileges shall not constitute a waiver thereof, either with respect to these objections or with respect to any future objections.

March 1, 2021

Respectfully submitted,



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I hereby certify that a true and correct copy of the foregoing was served this 1st day of March, 2021, by email, by agreement of the parties, addressed as follows:

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**DEFENDANT AND COUNTERCLAIM PLAINTIFF AMBER LAURA HEARD'S
OBJECTIONS TO PLAINTIFF AND COUNTERCLAIM DEFENDANT'S
SUBPOENA DUCES TECUM ISSUED TO BENJAMIN WIZNER**

NOTICE IS HEREBY GIVEN that Defendant and Counterclaim Plaintiff AMBER LAURA HEARD (“Ms. Heard”) hereby objects to Plaintiff and Counterclaim Defendant JOHN C. DEPP, II’s (“Mr. Depp”) Subpoena Duces Tecum to Person Under Foreign Subpoena, commanding non-party Benjamin Wizner (“Mr. Wizner”) to produce documents and electronically stored information on March 1, 2021 at 10:00 a.m. (“Subpoena Duces Tecum”).

GENERAL OBJECTIONS

The following general objections (the “General Objections”) are incorporated into each specific objection (the “Specific Objections”) as if fully set forth therein:

1. Defendant and Counterclaim Plaintiff objects to the Requests to the extent they are duplicative, cumulative, or seek documents that have already been provided through other means of discovery between the parties in this case.

2. Defendant and Counterclaim Plaintiff objects to the Subpoena Duces Tecum to the extent that Mr. Depp failed to comply with the service requirements of the state of New York, including but not limited to CPLR 2103(a), CPLR 311, and/or CPLR 308.

3. Defendant and Counterclaim Plaintiff objects to the Requests to the extent they are vague, ambiguous, overly broad, unduly burdensome, seek documents not relevant to the claims or defenses of any party, or are not proportional to the needs of the case.

4. Defendant and Counterclaim Plaintiff objects because Plaintiff and Counterclaim Defendant did not list Mr. Wizner as a witness with relevant knowledge in response to any witness knowledge Interrogatories served in this case.

5. The production of any documents by Mr. Wizner shall not be construed as any agreement or concurrence by Defendant and Counterclaim Plaintiff that any documents and information produced are admissible with respect to the claims and defenses of Plaintiff and Counterclaim Defendant and/or Defendant and Counterclaim Plaintiff.

6. Defendant and Counterclaim Plaintiff objects to each Request to the extent that it calls for documents and information that: (a) may be derived or ascertained from documents that have been or will be produced in this action between the parties; (b) are already in Plaintiff and Counterclaim Defendant's possession, custody, or control; (c) are publicly available; or (d) are otherwise independently available to Plaintiff and Counterclaim Defendant and/or his counsel.

7. Defendant and Counterclaim Plaintiff objects to the Requests to the extent they require unreasonable measures to locate and produce responsive documents.

8. Defendant and Counterclaim Plaintiff objects to the Requests to the extent they seek documents and information that are not within Mr. Wizner's possession, custody, or control.

9. Defendant and Counterclaim Plaintiff objects to the Definitions and Instructions to the extent they seek to impose obligations on Mr. Wizner greater than those imposed by the Rules or any other applicable law, rule, ruling of this court, or agreement of the parties.

10. Defendant and Counterclaim Plaintiff objects to the Requests to the extent they are based on a false premise and contain express or implied assumptions of fact or law with respect to matters at issue in this case. Defendant and Counterclaim Plaintiff's Objections to the Requests are not intended to be and shall not be construed as an agreement or concurrence with Plaintiff and Counterclaim Defendant's characterization of any facts, circumstances, or legal obligations. Defendant and Counterclaim Plaintiff reserves the right to contest any such characterization as inaccurate.

11. Defendant and Counterclaim Plaintiff further objects to these Requests to the extent they seek information protected by the attorney-client privilege, and on the grounds that this Request invades protected litigation work product and would require disclosure of core opinion work product and mental impression of counsel, which is prohibited by 4:1(b)(3) of the Rules of the Virginia Supreme Court. Plaintiff and Counterclaim Defendant has not made the requisite showing under the Rules.

12. Defendant and Counterclaim Plaintiff expressly reserves all rights and privileges under the Rules and any other applicable law or rule. The failure to assert such rights and privileges or the inadvertent disclosure of any information or documents protected by such rights or privileges shall not constitute a waiver thereof, either with respect to these objections or with respect to any future discovery objections.

OBJECTIONS TO DEFINITIONS

1. Defendant and Counterclaim Plaintiff objects to Definition No. 3 ("COMMUNICATION" and/or "COMMUNICATIONS") on the grounds that it is overly broad, unduly burdensome, and seeks documents not reasonably calculated to lead to the discovery of admissible evidence regarding the claims and defenses in this case, taking into account the needs

of the case, the amount in controversy, limitations on the parties' resources, and the importance of the discovery in resolving the issues at stake in the litigation to the extent it seeks documents beyond the scope defined in Va. Sup. Ct. R. 4:9(a).

2. Defendant and Counterclaim Plaintiff objects to Definition No. 4 ("DECLARATION") on the grounds that the request for any documents concerning the Declaration is overly broad, unduly burdensome, and harassing, and at this time now seeks information and documents that are moot and not reasonably calculated to lead to the discovery of admissible evidence regarding the claims and defenses in this case, taking into account that the Plea in Bar has been fully argued and is pending before the Court, the needs of the case, the amount in controversy, limitations on the parties' resources, and the importance of the discovery in resolving the issues at stake in the litigation. The Declaration was Attachment 7 to Defendant and Counterclaim Plaintiff's Opposition to the Plea in Bar, and the Motion was argued to the Court on January 29, 2021, with the decision pending. Plaintiff and Counterclaim Defendant completely ignored and did not address the Declaration in his Reply brief supporting the Plea in Bar, and at oral argument only mentioned the Declaration by threatening sanctions in another jurisdiction because Plaintiff and Counterclaim Defendant has been unable to serve other subpoenas. Plaintiff and Counterclaim Defendant never argued or even mentioned the merits or substance of the Declaration in either the Reply brief or at oral argument, so the evidentiary record for the Plea in Bar on the "of public concern" issue pending before the Court is complete, and not subject to re-opening. Plaintiff and Counterclaim Defendant also did not seek any additional time to conduct discovery regarding the Declaration in either the Reply brief or at oral argument, further conceding that this Request is moot, overbroad, unduly burdensome, and seeks information not reasonably calculated to lead to the discovery of admissible evidence regarding

the claims and defenses in this case. Defendant and Counterclaim Plaintiff further objects because Plaintiff and Counterclaim Defendant now only seeks to harass, punish, and unnecessarily burden Mr. Wizner, a third-party, because he previously provided the Declaration for the Plea in Bar.

3. Defendant and Counterclaim Plaintiff objects to Definition No. 5 (“DIVORCE ACTION”) on the grounds that it is overly broad, unduly burdensome, and seeks documents not reasonably calculated to lead to the discovery of admissible evidence regarding the claims and defenses in this case, taking into account the needs of the case, the amount in controversy, limitations on the parties’ resources, and the importance of the discovery in resolving the issues at stake in the litigation to the extent it seeks documents beyond Va. Sup. Ct. R. 4:9(a).

4. Defendant and Counterclaim Plaintiff objects to Definition No. 6 (“DOCUMENT” and/or “DOCUMENTS”) on the grounds that it is overly broad, unduly burdensome, and seeks documents not reasonably calculated to lead to the discovery of admissible evidence regarding the claims and defenses in this case, taking into account the needs of the case, the amount in controversy, limitations on the parties’ resources, and the importance of the discovery in resolving the issues at stake in the litigation to the extent it seeks documents beyond the scope defined in Va. Sup. Ct. R. 4:9(a).

5. Defendant and Counterclaim Plaintiff objects to Definition No. 7 (“ELECTRONICALLY STORED INFORMATION”) on the grounds that it is overly broad, unduly burdensome, and seeks documents not reasonably calculated to lead to the discovery of admissible evidence regarding the claims and defenses in this case, taking into account the needs of the case, the amount in controversy, limitations on the parties’ resources, and the importance

of the discovery in resolving the issues at stake in the litigation to the extent it seeks documents beyond the scope defined in Va. Sup. Ct. R. 4:9(a).

OBJECTIONS TO INSTRUCTIONS

1. Defendant and Counterclaim Plaintiff objects to Instruction No. 1 as vague, ambiguous, and failing to define with particularity the documents and information that it seeks, as it defines words in a circular, confusing, and non-specific manner, and is therefore unduly burdensome. Defendant and Counterclaim Plaintiff further objects to Instruction No. 1 as overly broad, unduly burdensome, and seeks documents not reasonably calculated to lead to the discovery of admissible evidence regarding the claims and defenses in this case, taking into account the needs of the case, the amount in controversy, limitations on the parties' resources, and the importance of the discovery in resolving the issues at stake in the litigation to the extent it seeks documents beyond Va. Sup. Ct. R. 4:9(a).

2. Defendant and Counterclaim Plaintiff objects to Instruction No. 2 as vague, ambiguous, and failing to define with particularity the documents and information that it seeks.

3. Defendant and Counterclaim Plaintiff objects to Instruction Nos. 3-5 on the grounds that they exceed the requirements of Va. Sup. Ct. R. 4:9, and are therefore overly broad, unduly burdensome, and seek documents and information not reasonably calculated to lead to the discovery of admissible evidence regarding the claims and defenses in this case.

4. Defendant and Counterclaim Plaintiff objects to Instruction No. 7 to the extent it exceeds the requirements of Va. Sup. Ct. R. 4:9(a), which only requires the production of documents "which are in the possession, custody, or control of the party upon whom the request is served," and is therefore overly broad, unduly burdensome, and seeks documents not

reasonably calculated to lead to the discovery of admissible evidence regarding the claims and defenses in this case.

5. Defendant and Counterclaim Plaintiff objects to Instruction No. 8 because it exceeds the requirements of Va. Sup. Ct. R 4:9, and is therefore overly broad, unduly burdensome, and seeks information not reasonably calculated to lead to the discovery of admissible evidence regarding the claims and defenses in this case.

6. Defendant and Counterclaim Plaintiff objects to Instruction No. 9 on the grounds that it exceeds the requirements of Va. Sup. Ct. R 4:9, and is therefore overly broad, unduly burdensome, and seeks information and documents not reasonably calculated to lead to the discovery of admissible evidence regarding the claims and defenses in this case.

7. Defendant and Counterclaim Plaintiff objects to Instruction No. 10 seeking “transmittal sheets and cover letters” on the grounds that the request for such documents is overly broad, unduly burdensome, and seeks documents not reasonably calculated to lead to the discovery of admissible evidence regarding the claims and defenses in this case.

8. Defendant and Counterclaim Plaintiff objects to Instruction No. 11 on the grounds that it exceeds the requirements of Va. Sup. Ct. R 4:9, and is therefore overly broad, unduly burdensome, and seeks information not reasonably calculated to lead to the discovery of admissible evidence regarding the claims and defenses in this case. Defendant and Counterclaim Plaintiff further objects to Instruction No. 11 on the grounds that it exceeds the requirements of Va. Sup. Ct. R 4:9 and 4:1(b)(6), and is therefore overly broad, unduly burdensome, and seeks information not reasonably calculated to lead to the discovery of admissible evidence regarding the claims and defenses in this case.

9. Defendant and Counterclaim Plaintiff objects to Instruction No. 13 on the grounds it exceeds the requirements of Va. Sup. Ct. R 4:9, and is therefore overly broad, unduly burdensome, and seeks information not reasonably calculated to lead to the discovery of admissible evidence regarding the claims and defenses in this case. This Instruction is particularly inappropriate, harassing, and sanctionable by threatening a third-party that “It shall be insufficient to object to a particular Request on the grounds that it is vague, ambiguous, or otherwise unclear, and without DOCUMENTS on that basis without seeking clarification,” as such an instruction is grossly beyond the requirements of Va. Sup. Ct. Rs. 4:1 and 4:9, and improperly attempts to shift the burden of resolving or clarifying vague, ambiguous, or otherwise unclear Requests issued by Plaintiff and Counterclaim Defendant onto a third-party.

OBJECTIONS TO DOCUMENT REQUESTS

1. All DOCUMENTS and COMMUNICATIONS concerning the approval, preparation, drafting, and submission YOUR DECLARATION.

OBJECTION: Defendant and Counterclaim Plaintiff objects to this Request on the grounds that the request for any documents relating to the Declaration is moot and not reasonably calculated to lead to the discovery of admissible evidence relating to the claims and defenses in this case, taking into account that the Plea in Bar has been fully argued and is pending before the Court, the needs of the case, the amount in controversy, limitations on the parties’ resources, and the importance of the discovery in resolving the issues at stake in the litigation. The Declaration was Attachment 7 to Ms. Heard’s Opposition to the Plea in Bar, and the Motion was argued before the Court on January 29, 2021, with the decision currently pending. Mr. Depp’s counsel did not address the Declaration in his Reply brief supporting the Plea in Bar, and at oral argument only mentioned the Declaration by threatening sanctions in another jurisdiction because Mr. Depp has been unable to serve other subpoenas. Mr. Depp

never argued or even mentioned the merits or substance of the Declaration in either the Reply brief or at oral argument, so the evidentiary record for the Plea in Bar on the issue of whether Ms. Heard's Op Ed was "of public concern that would be protected under the First Amendment" is complete, and the decision is pending before the Court. Mr. Depp also did not seek any additional time to conduct discovery respecting the Declaration in either the Reply brief or at oral argument, further conceding that this Request is moot, and seeks information not reasonably calculated to lead to the discovery of admissible evidence respecting the claims and defenses in this case. It is apparent that the purpose of the subpoena duces tecum is to harass, punish, and unnecessarily burden Mr. Wizner, a third-party, because he previously provided the Declaration supporting Ms. Heard's Opposition to the Plea in Bar.

2. All DOCUMENTS YOU relied upon and/or considered in connection with the preparation of YOUR DECLARATION.

OBJECTION: Please see the objections to No. 1, which are fully incorporated herein.

3. All DOCUMENTS and COMMUNICATIONS concerning MS. HEARD's role as an "ambassador" for the ACLU referenced in Paragraph 4 of YOUR DECLARATION.

OBJECTION: Please see the objections to No. 1, which are fully incorporated herein.

In addition, Defendant and Counterclaim Plaintiff objects to this Request for any documents and communications concerning Ms. Heard's role as an "ambassador" for the ACLU on Women's Rights, because it is overly broad, unduly burdensome, and seeking documents not reasonably calculated to lead to the discovery of admissible evidence regarding the claims and defenses in this case, taking into account the needs of the case, the amount in controversy, limitations on the parties' resources, and the importance of the discovery in resolving the issues at stake in the litigation.

4. All DOCUMENTS and COMMUNICATIONS concerning the preparation, drafting, and publication of the OP-ED.

OBJECTION: Defendant and Counterclaim Plaintiff objects to this Request on the grounds that it places an unnecessary and improper burden on a third-party, and is unreasonably cumulative and duplicative of Plaintiff and Counterclaim Defendant's Requests for Production previously served on Defendant and Counterclaim Plaintiff in this case (including but not limited to Request Nos. 3 of Plaintiff and Counterclaim Defendant's 6th Set of Requests for Production of Documents), in response to which Defendant and Counterclaim Plaintiff has already produced at least 685 pages of responsive documents.

5. All DOCUMENTS and communications exchanged between YOU and MS. HEARD or other PERSONS acting on her behalf concerning: (i) the DIVORCE ACTION; (ii) the OP-ED; (iii) the VIRGINIA ACTION; (iv) YOUR DECLARATION; and/or (v) the relationship between MR. DEPP and MS. HEARD.

OBJECTION: Defendant and Counterclaim Plaintiff objects to this Request on the grounds that the phrase "other PERSONS acting on her behalf" is vague, ambiguous, and fails to define with particularity the information that it seeks, and to the extent it seeks a legal conclusion.

Please see the objections to No. 1, which are fully incorporated herein. Defendant and Counterclaim Plaintiff further objects to this Request on the grounds that the request for any documents concerning the Declaration is overly broad, unduly burdensome, and harassing

Defendant and Counterclaim Plaintiff further objects to this Request seeking documents and communications concerning "the VIRGINIA ACTION" as failing to define with particularity the documents that they seek, overly broad, unduly burdensome, and seeking documents not reasonably calculated to lead to the discovery of admissible evidence regarding the claims and defenses in this case, taking into account the needs of the case, the amount in

controversy, limitations on the parties' resources, and the importance of the discovery in resolving the issues at stake in the litigation. Additionally, in Mr. Depp's objections and responses to Ms. Heard's 10th Requests for Production of Documents, Mr. Depp extensively objected to Request Nos. 24-25 seeking the same categories of documents and stood on those objections, therefore taking the position that this Request is objectionable for the same reasons.

Defendant and Counterclaim Plaintiff further objects to this Request seeking documents and communications concerning "the DIVORCE ACTION" as overly broad, unduly burdensome, harassing, and seeks information not reasonably calculated to lead to the discovery of admissible evidence regarding the claims and defenses in this case, taking into account the needs of the case, the amount in controversy, limitations on the parties' resources, and the importance of the discovery in resolving the issues at stake in the litigation, and critically the Court's prior rulings defining the scope of relevant discovery in this case quoted in detail below. On September 18, 2020 the Court ruled that discovery seeking documents during the parties' marriage and related to the divorce case was overbroad and beyond the scope of relevant discovery in this case because "its denied under the doctrine of enough is enough. You all have been through the divorce already. We're not going to retry that divorce in this case."

Defendant and Counterclaim Plaintiff further objects to this Request seeking documents concerning "the relationship between MR. DEPP and MS. HEARD" on the grounds that it is vague, ambiguous, and fails to define with particularity the information that it seeks, and is overly broad, unduly burdensome, harassing, and seeks information not reasonably calculated to lead to the discovery of admissible evidence regarding the claims and defenses in this case, taking into account the needs of the case, the amount in controversy, limitations on the parties' resources, and the importance of the discovery in resolving the issues at stake in the litigation,

and critically the Court's prior rulings defining the scope of relevant discovery in this case quoted in detail below. On December 18, 2020, the Court ruled that Request 51 of Mr. Depp's 3rd Requests for Documents seeking all communications between Ms. Heard and anyone relating to her relationship with Mr. Depp was overbroad, and therefore beyond the scope of discovery in this case. The Court also ruled that Request 52 of Mr. Depp's 3rd Requests for Documents seeking all documents and communications relating to Ms. Heard's "relationship with Mr. Depp" was also overbroad, and therefore beyond the scope of discovery in this case.

Defendant and Counterclaim Plaintiff further objects to this Request seeking documents and communications concerning the Op-Ed on the grounds that it places an unnecessary and improper burden on a third-party, and is unreasonably cumulative and duplicative of Plaintiff and Counterclaim Defendant's Requests for Production previously served on Defendant and Counterclaim Plaintiff in this case (including but not limited to Request Nos. 3 of Plaintiff and Counterclaim Defendant's 6th Set of Requests for Production of Documents), in response to which Defendant and Counterclaim Plaintiff has already produced at least 685 pages of responsive documents.

March 1, 2021

Respectfully submitted,



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CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing was served this 1st day of March, 2021, by email, by agreement of the parties, addressed as follows:

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