

EXHIBIT 27

Meyers, Jessica N.

From: Meyers, Jessica N.
Sent: Tuesday, March 23, 2021 4:23 PM
To: Schwartz, Michael (x2252)
Cc: Crawford, Andrew C.; Vasquez, Camille M.; Teplin, Stephanie (x2543); Chew, Benjamin G.
Subject: RE: John C. Depp, II v. Amber Laura Heard, Originating Case No. CL-2019-23911 (V.A. Cir. Ct. Fairfax Cnty.)

Hi Mike,

Thank you for accepting service of the subpoenas to Mr. Romero. We agree that Mr. Romero can have until April 2, 2021 to serve his responses and objections to the subpoenas.

We will be looking out for the ACLU Foundation's responses and objections to the subpoenas tomorrow.

Best,
Jess

From: Schwartz, Michael (x2252) <mschwartz@pbwt.com>
Sent: Friday, March 19, 2021 10:33 AM
To: Meyers, Jessica N. <JMeyers@brownrudnick.com>
Cc: Crawford, Andrew C. <ACrawford@brownrudnick.com>; Vasquez, Camille M. <CVasquez@brownrudnick.com>; Teplin, Stephanie (x2543) <steplin@pbwt.com>; Chew, Benjamin G. <BChew@brownrudnick.com>
Subject: RE: John C. Depp, II v. Amber Laura Heard, Originating Case No. CL-2019-23911 (V.A. Cir. Ct. Fairfax Cnty.)

CAUTION: External E-mail. Use caution accessing links or attachments.

Jess,

We have received authorization to accept service by email of the two subpoenas directed to Anthony Romero on the condition that we are given until April 2, 2021 to serve written responses and objections. Please let us know if you agree.

Thanks,
Mike

Michael D. Schwartz
Patterson Belknap Webb & Tyler LLP
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New York, NY 10036
(212) 336-2252
mschwartz@pbwt.com

From: Schwartz, Michael (x2252)
Sent: Thursday, March 18, 2021 5:08 PM
To: Meyers, Jessica N. <JMeyers@brownrudnick.com>

Cc: Crawford, Andrew C. <ACrawford@brownrudnick.com>; Vasquez, Camille M. <CVasquez@brownrudnick.com>; Teplin, Stephanie (x2543) <steplin@pbwt.com>; Chew, Benjamin G. <BCheW@brownrudnick.com>
Subject: RE: John C. Depp, II v. Amber Laura Heard, Originating Case No. CL-2019-23911 (V.A. Cir. Ct. Fairfax Cnty.)

Hi Jess,

We are still consulting with our client regarding service of the Romero subpoenas and the protective order. We hope to have responses on both issues soon. Regarding the ACLU Foundation and Wizner subpoenas, we will aim to make our document production by April 9. We'll let you know if we encounter any delays.

Regards,
Mike

Michael D. Schwartz

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From: Meyers, Jessica N. <JMeyers@brownrudnick.com>

Sent: Tuesday, March 16, 2021 12:33 PM

To: Schwartz, Michael (x2252) <mschwartz@pbwt.com>; Chew, Benjamin G. <BCheW@brownrudnick.com>

Cc: Crawford, Andrew C. <ACrawford@brownrudnick.com>; Vasquez, Camille M. <CVasquez@brownrudnick.com>; Teplin, Stephanie (x2543) <steplin@pbwt.com>

Subject: RE: John C. Depp, II v. Amber Laura Heard, Originating Case No. CL-2019-23911 (V.A. Cir. Ct. Fairfax Cnty.)

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Stephanie,

As a follow up to our call this afternoon, attached please find the protective order entered in the Virginia Action and the subpoenas issued by the Virginia Court that we have attempted to serve on Mr. Romero. Please advise whether you are authorized to accept service of the attached subpoenas on Mr. Romero's behalf.

We understand that you are looking into whether you will be able to make a production of documents pursuant to the subpoenas served on the ACLU Foundation and Mr. Wizner prior to April 15th and look forward to an update from you this coming Thursday.

Best,
Jess

From: Schwartz, Michael (x2252) <mschwartz@pbwt.com>

Sent: Thursday, March 11, 2021 11:03 AM

To: Meyers, Jessica N. <JMeyers@brownrudnick.com>; Chew, Benjamin G. <BCheW@brownrudnick.com>

Cc: Crawford, Andrew C. <ACrawford@brownrudnick.com>; Vasquez, Camille M. <CVasquez@brownrudnick.com>;
Teplin, Stephanie (x2543) <steplin@pbwt.com>
Subject: RE: John C. Depp, II v. Amber Laura Heard, Originating Case No. CL-2019-23911 (V.A. Cir. Ct. Fairfax Cnty.)

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Yes, that timing works for us. Please again include Stephanie Teplin and me on the invite.

Michael D. Schwartz

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From: Meyers, Jessica N. <JMeyers@brownrudnick.com>
Sent: Thursday, March 11, 2021 10:52 AM
To: Schwartz, Michael (x2252) <mschwartz@pbwt.com>; Chew, Benjamin G. <BCheW@brownrudnick.com>
Cc: Crawford, Andrew C. <ACrawford@brownrudnick.com>; Vasquez, Camille M. <CVasquez@brownrudnick.com>;
Teplin, Stephanie (x2543) <steplin@pbwt.com>
Subject: RE: John C. Depp, II v. Amber Laura Heard, Originating Case No. CL-2019-23911 (V.A. Cir. Ct. Fairfax Cnty.)

Caution: External Email!

Hi Mike,

Thank you for accepting service of the ACLU Foundation subpoenas. Does 11am ET on March 16th work for your team? If so, I can circulate a calendar invite and dial-in.

Best,
Jess

From: Schwartz, Michael (x2252) <mschwartz@pbwt.com>
Sent: Thursday, March 11, 2021 9:55 AM
To: Meyers, Jessica N. <JMeyers@brownrudnick.com>; Chew, Benjamin G. <BCheW@brownrudnick.com>
Cc: Crawford, Andrew C. <ACrawford@brownrudnick.com>; Vasquez, Camille M. <CVasquez@brownrudnick.com>;
Teplin, Stephanie (x2543) <steplin@pbwt.com>
Subject: RE: John C. Depp, II v. Amber Laura Heard, Originating Case No. CL-2019-23911 (V.A. Cir. Ct. Fairfax Cnty.)

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Jess,

On behalf of the ACLU Foundation, we confirm receipt of your subpoenas *duces tecum* and *ad testificandum*. We note that any prior attempts at service were improper as Abdi Soltani is not an ACLU Foundation employee and is not authorized to accept service for the ACLU Foundation. But as we previously indicated, we can now accept service of the subpoenas.

While we will need to review the subpoenas with our client, we anticipate serving written responses and objections. Could we move our planned call to next Tuesday, March 16? We are available any time before 3pm. By then we should be in a position to offer preliminary thoughts about these new subpoenas and to discuss a reasonable timetable for ACLU Foundation's written responses and anticipated document production.

Thanks,
Mike

Michael D. Schwartz

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From: Meyers, Jessica N. <JMeyers@brownrudnick.com>

Sent: Wednesday, March 10, 2021 3:13 PM

To: Schwartz, Michael (x2252) <mschwartz@pbwt.com>; Chew, Benjamin G. <BCheW@brownrudnick.com>

Cc: Crawford, Andrew C. <ACrawford@brownrudnick.com>; Vasquez, Camille M. <CVasquez@brownrudnick.com>;

Teplin, Stephanie (x2543) <steplin@pbwt.com>

Subject: RE: John C. Depp, II v. Amber Laura Heard, Originating Case No. CL-2019-23911 (V.A. Cir. Ct. Fairfax Cnty.)

Caution: External Email!

Michael, Stephanie,

As discussed on our call last Friday, attached please find the subpoenas *duces tecum* and *ad testificandum* to the ACLU Foundation that were previously served on Abdi Soltani on February 11, 2021. Although we believe these have already been validly served, please confirm that you will, as stated below, also accept service of the attached subpoenas. We, of course, are willing to renegotiate the compliance dates for the subpoenas, which have passed at this point.

Please let us know your availability for a call this coming Monday, March 15, 2021 to discuss the attached subpoenas and the outstanding items with respect to the subpoena to Mr. Wizner. If we can first agree to date(s) for the production of documents pursuant to the subpoenas, I believe we can hold off on scheduling any deposition until after we have had an opportunity to review the produced materials.

Best,
Jess

brownrudnick

Jessica N. Meyers

Counselor at Law

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F: 212-938-2955

jmeyers@brownrudnick.com

www.brownrudnick.com

Please consider the environment before printing this e-mail

From: Schwartz, Michael (x2252) <mschwartz@pbwt.com>

Sent: Wednesday, March 3, 2021 4:03 PM

To: Chew, Benjamin G. <BChew@brownrudnick.com>

Cc: Crawford, Andrew C. <ACrawford@brownrudnick.com>; Vasquez, Camille M. <CVasquez@brownrudnick.com>;

Meyers, Jessica N. <JMeyers@brownrudnick.com>; Teplin, Stephanie (x2543) <steplin@pbwt.com>

Subject: RE: John C. Depp, II v. Amber Laura Heard, Originating Case No. CL-2019-23911 (V.A. Cir. Ct. Fairfax Cnty.)

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Yes, I'd appreciate if you could send a calendar invite and dial-in. Please include my colleague Stephanie Teplin.

Michael D. Schwartz

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mschwartz@pbwt.com

From: Chew, Benjamin G. <BChew@brownrudnick.com>

Sent: Wednesday, March 3, 2021 3:11 PM

To: Schwartz, Michael (x2252) <mschwartz@pbwt.com>

Cc: Crawford, Andrew C. <ACrawford@brownrudnick.com>; Vasquez, Camille M. <CVasquez@brownrudnick.com>;

Meyers, Jessica N. <JMeyers@brownrudnick.com>; Teplin, Stephanie (x2543) <steplin@pbwt.com>

Subject: John C. Depp, II v. Amber Laura Heard, Originating Case No. CL-2019-23911 (V.A. Cir. Ct. Fairfax Cnty.)

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Dear Mike,

Thanks for your response.

Let's speak at 10:00 a.m. Friday. With your leave I will send a call-in number in case any of your colleagues wish to join the call. (Ms. Meyers and perhaps Ms. Vasquez will be joining me for Mr. Depp.)

I take it from your contention concerning service that the Foundation will NOT be appearing this Friday, so, unless you state otherwise, I will apprise Ms. Heard's counsel that has been postponed. Without agreeing with your client's contention concerning lack of service, we appreciate your offer and will re-serve the Foundation through you forthwith. Our desire is not to fight, but to simply get the information we need with as little cost and disruption for all concerned.

Look forward to speaking with you Friday morning.

Best regards,

Ben

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Benjamin G. Chew

Partner

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Fellow,
American College
of Trial Lawyers

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From: Schwartz, Michael (x2252) <mschwartz@pbwt.com>

Sent: Wednesday, March 3, 2021 3:05 PM

To: Chew, Benjamin G. <BChew@brownrudnick.com>

Cc: Crawford, Andrew C. <ACrawford@brownrudnick.com>; Vasquez, Camille M. <CVasquez@brownrudnick.com>;

Meyers, Jessica N. <JMeyers@brownrudnick.com>; Teplin, Stephanie (x2543) <steplin@pbwt.com>

Subject: RE: John C. Depp, II v. Amber Laura Heard, Originating Case No. CL-2019-23911 (V.A. Cir. Ct. Fairfax Cnty.)

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Ben,

Thank you for your email. We do also represent the ACLU Foundation, however the ACLU Foundation has not been served with a subpoena in this matter. We have conferred with our client and we are authorized to accept electronic service of a properly-issued New York subpoena on the ACLU Foundation.

We are available to speak regarding the Wizner subpoena on Friday from 10:00-11:30 or 1:00-3:00, or next Monday from 11:00-1:30. Please let us know if either day works for you.

Regards,

Mike

Michael D. Schwartz

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mschwartz@pbwt.com

From: Chew, Benjamin G. <BChew@brownrudnick.com>

Sent: Wednesday, March 3, 2021 1:19 PM

To: Schwartz, Michael (x2252) <mschwartz@pbwt.com>

Cc: Crawford, Andrew C. <ACrawford@brownrudnick.com>; Vasquez, Camille M. <CVasquez@brownrudnick.com>;

Meyers, Jessica N. <JMeyers@brownrudnick.com>; Teplin, Stephanie (x2543) <steplin@pbwt.com>

Subject: FW: John C. Depp, II v. Amber Laura Heard, Originating Case No. CL-2019-23911 (V.A. Cir. Ct. Fairfax Cnty.)

Caution: External Email!

Good afternoon, Michael,

We had some issues with our email yesterday, so am resending to make sure you received. Please confirm.

Best regards,

Ben

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Benjamin G. Chew

Partner

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Please consider the environment before printing this e-mail

From: Chew, Benjamin G. [<mailto:BChew@brownrudnick.com>]

Sent: Tuesday, March 02, 2021 12:48 PM

To: Schwartz, Michael (x2252); Crawford, Andrew C.; Vasquez, Camille M.; Meyers, Jessica N.

Cc: Teplin, Stephanie (x2543)

Subject: John C. Depp, II v. Amber Laura Heard, Originating Case No. CL-2019-23911 (V.A. Cir. Ct. Fairfax Cnty.)

Dear Mike,

Thanks for your message.

Three quick questions:

1. Are you also representing the ACLU Foundation, Inc., which Mr. Depp also served with a subpoena?
2. To the extent you don't, do you know who does represent that entity?
3. Might you be available to meet and confer with respect to your objections on behalf of Mr. Wizner sometime tomorrow (except between 4:15 and 5:00 p.m. EST) or Thursday? We would also like to discuss a mutually convenient date for that deposition.

Look forward to your response.

Best regards,

Ben

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Benjamin G. Chew

Partner

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Please consider the environment before printing this e-mail

From: Schwartz, Michael (x2252) [<mailto:mschwartz@pbwt.com>]

Sent: Monday, March 01, 2021 1:03 PM

To: Chew, Benjamin G.; Crawford, Andrew C.; Vasquez, Camille M.; Meyers, Jessica N.

Cc: Teplin, Stephanie (x2543); ebredehoft@cbclaw.com

Subject: John C. Depp, II v. Amber Laura Heard, Originating Case No. CL-2019-23911 (V.A. Cir. Ct. Fairfax Cnty.)

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Counsel:

We represent Non-Party Benjamin Wizner in connection with the two foreign subpoenas he received in the above-captioned matter, both dated February 1, 2021. Please see attached letter and written responses & objections. These documents are also being sent via Fedex to Jessica Meyers at her New York office address.

Regards,
Mike Schwartz

Michael D. Schwartz
Patterson Belknap Webb & Tyler LLP
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(212) 336-2252
mschwartz@pbwt.com

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