

# **EXHIBIT 32**

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

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JOHN C. DEPP, II,

Plaintiff and  
Counterclaim  
Defendant,

(Subpoena issued pursuant to  
Uniform Interstate Deposition and  
Discovery Act)

Originating Court:  
Circuit Court of Fairfax County,  
Virginia

vs.

AMBER LAURA HEARD,

Defendant and  
Counterclaim Plaintiff.

Originating Case Number:  
No. CL-2019-02911

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**DEFENDANT AND COUNTERCLAIM PLAINTIFF AMBER LAURA HEARD'S  
RESPONSES AND OBJECTIONS TO PLAINTIFF AND COUNTERCLAIM  
DEFENDANT'S SUBPOENA DUCES TECUM ISSUED TO NON-PARTY ANTHONY  
ROMERO**

**PLEASE TAKE NOTICE** that Defendant and Counterclaim Plaintiff AMBER LAURA HEARD (“Ms. Heard”) hereby responds and objects to the Subpoena Duces Tecum to Person Under Foreign Subpoena issued by Plaintiff and Counterclaim Defendant JOHN C. DEPP, II (“Mr. Depp”) to Non-Party ANTHONY ROMERO (“Non-Party”) dated February 4, 2021 (the “Subpoena”) to produce documents and electronically stored information on March 1, 2021.

**GENERAL OBJECTIONS**

1. These General Objections are hereby incorporated by reference in response to each of the separate document requests as if fully set forth therein. The inclusion of any specific objection to a document request in any answer below is neither intended as, nor shall in any way be deemed, a waiver of any General Objection or of any other specific objection made herein or that may be asserted at a later date. In addition, the failure to include at this time any general or specific objection to a document request is neither intended as, nor shall in any way be deemed, a

waiver of Ms. Heard's rights to assert that or any other objection at a later date.

2. As a preliminary matter, Ms. Heard objects to the Subpoena on the grounds that it fails to comply with the requirements set forth in CPLR 3101(a)(4). There exists a threshold requirement for discovery in New York civil actions, that the disclosure sought is "material and necessary in the prosecution or defense of an action." *Matter of Aerco Intl., Inc. v. Precision Machining & Stamping, Inc.*, 40 Misc. 3d 571, 575 (Sup. Ct., NY County 2013) (citing CPLR 3101(a)(4)). This also requires that a non-party be given "notice stating the circumstances or reasons the disclosure is sought to afford a nonparty who has no idea of the parties' dispute or a party affected by such request an opportunity to decide how to respond." *Id.* at 576. The Subpoena served on Non-Party fails to satisfy the notice requirement set forth in *Aerco*. There is no attempt by Mr. Depp to advise Non-Party of the relevancy of the testimony and/or documents requested, nor explain why the documents and/or testimony requested are needed to aid in either the prosecution or defense of the underlying suit. This issue is further exacerbated by the overbreadth of each of the requests, discussed in Ms. Heard's specific objections, below.

3. Ms. Heard objects to the request to the extent it is duplicative, cumulative, or seeks documents that have already been provided through other means of discovery in this case.

4. Ms. Heard 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.

5. Ms. Heard objects to the request to the extent it is vague, ambiguous, overly broad, unduly burdensome, seeks documents not relevant to the claims or defenses of any party, or is not proportional to the needs of the case.

6. Ms. Heard objects to the Subpoena to the extent Mr. Depp did not list Non-Party as a witness with relevant knowledge to any witness knowledge interrogatories served in this case.

7. The production of any documents by Non-Party shall not be construed as any agreement or concurrence by Ms. Heard that any documents and information produced are

admissible with respect to the claims and defenses of Mr. Depp and Ms. Heard.

8. Ms. Heard objects to the 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 Mr. Depp's possession, custody, or control; (c) are publicly available; or (d) are otherwise independently available to Mr. Depp.

9. Ms. Heard objects to the request to the extent it requires unreasonable measures to locate and produce responsive documents and/or fails to avoid imposing an undue burden or expense on Non-Party.

10. Ms. Heard objects to the request to the extent it seeks documents and information that are not within Non-Party's possession, custody, or control.

11. Ms. Heard objects to the request to the extent it purports to impose obligations inconsistent with and/or beyond the scope imposed by CPLR § 3101(a)(4), the Uniform Interstate Deposition and Discovery Act, or any other applicable law, rule, ruling of this court, or agreement of the parties.

12. Ms. Heard objects to the request to the extent it is based on a false premise and contains express or implied assumptions of fact or law with respect to matters at issue in this case. Ms. Heard's objections to the requests are not intended to be and shall not be construed as an agreement or concurrence with Mr. Depp's characterization of any facts, circumstances, or legal obligations. Ms. Heard reserves the right to contest any such characterization as inaccurate.

13. Ms. Heard objects to the request to the extent it seeks information protected from disclosure by the attorney-client privilege, the work product doctrine, or any other applicable statutory or common-law privilege, prohibition, or immunity from disclosure. Nothing contained in the responses is intended as, or shall in any way be deemed, a waiver of any attorney-client privilege, attorney work product doctrine or any other applicable privilege, immunity, prohibition or limitation. Any inadvertent production thereof shall not be deemed a waiver of any privilege, immunity, prohibition or limitation with respect to such information or of any work-product

protection that may be attached thereto.

14. Ms. Heard objects to the request to the extent it seeks the production of “all” documents or “all” communications of a particular category. Such requests are unreasonably burdensome, particularly in light of Non-Party’s status as a non-party to the underlying suit. *See, e.g., In re Estate of Souza*, 80 A.D.3d 446 (N.Y. App. Div. 2011) (affirming order quashing such requests as overbroad and burdensome); *Brand New School, LLC v Mill Group, Inc.*, 15CV7904ALCKNF, 2017 WL 462269, at \*1 (S.D.N.Y. Jan. 17, 2017) (such requests are “vague, overly broad and unduly burdensome”).

15. Ms. Heard objects to the request to the extent it seeks the production of records, documents, or information outside the purview of a request pursuant to the New York Civil Practice Law and Rules.

16. Ms. Heard objects to the request to the extent that it seek documents which contain proprietary information, trade secrets, or other confidential information, including the financial or other confidential or personal information of Ms. Heard, Non-Party, and/or any third parties.

17. Ms. Heard objects to the Subpoena to the extent it does not allow Non-Party a reasonable time for compliance.

18. Ms. Heard objects to the request to the extent it is vague and ambiguous and requires Non-Party to speculate as to the nature and scope of the documents sought.

19. Ms. Heard objects to the request on the grounds that it is for the purpose of harassing Non-Party or Ms. Heard.

20. Ms. Heard objects to the request as being compound and containing subparts which are confusing and subject to various interpretations.

21. Ms. Heard does not waive, but expressly reserves, any and all objections to the authenticity, competency, materiality, or admissibility at trial of any information or documents produced, set forth, identified, or referred to by Non-Party in response to the Subpoena.

22. Ms. Heard reserves the right to amend her responses and objections to the Subpoena at the completion of discovery in the underlying suit, or at any time prior to trial.

23. Ms. Heard expressly reserves all rights and privileges under any applicable law or rule. The failure to assert such right and privileges shall not constitute a waiver thereof, either with respect to these objections or with respect to any future objections.

**OBJECTIONS TO DEFINITIONS**

1. Ms. Heard 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. Ms. Heard objects to Definition No. 4 (“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).

3. Ms. Heard objects to Definition No. 5 (“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).

4. Ms. Heard objects to Definition No. 6 (“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. Ms. Heard 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. Ms. Heard 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. Ms. Heard objects to Instruction No. 2 as vague, ambiguous, and failing to define with particularity the documents and information that it seeks.

3. Ms. Heard objects to Instruction Nos. 3-6 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. Ms. Heard 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. Ms. Heard objects to Instruction No. 8 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.

6. Ms. Heard 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. Ms. Heard 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. Ms. Heard 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.

9. Ms. Heard objects to Instruction No. 12 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

10. Ms. Heard 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 Mr. Depp onto a third-party.

### **OBJECTIONS TO SPECIFIC REQUESTS**

#### **Request No. 1**

All DOCUMENTS that refer, reflect, or relate to any donations made to the ACLU by MS. HEARD or any PERSON on MS. HEARD’s behalf, from January 1, 2016 through and including the present.

#### **Response to Request No. 1**

Ms. Heard incorporates by this reference the above-stated General Objections as though set forth in full. Ms. Heard further objects to this request on the basis that it is grossly overbroad and unduly burdensome to the point of harassment, particularly to the extent that it seeks information that is not calculated to lead to the discovery of information relevant to the subject matter of this action, including information related to matters beyond the scope of the asserted claims and defenses in this suit; is not reasonably calculated to lead to the discovery of admissible evidence; and calls for the production of “all” documents. Objection is also made on the basis the request seeks information from outside a reasonable time period. Objection is also made on the basis the request is vague and ambiguous, and fails to specify the documents sought with reasonable particularity. Objection is also made on the basis the request seeks documents protected from disclosure by Ms. Heard’s constitutional rights, including her right to privacy and freedom of association. Objection is also made on the basis the request seeks documents protected by the constitutional rights and other privacy rights of Non-Party and/or third parties. Objection is also made on the basis the request seeks information that is otherwise available to Mr. Depp through less intrusive means by discovery directed to Ms. Heard. Objection is also made on the basis the request seeks confidential and proprietary business information and/or trade secrets of Non-Party.

**Request No. 2:**

All COMMUNICATIONS between YOU and MS. HEARD or any PERSON acting on MS. HEARD's behalf regarding any donations made to the ACLU by MS. HEARD or any PERSON on MS. HEARD's behalf, from January 1, 2016 through and including the present.

**Response to Request No. 2**

Ms. Heard incorporates by this reference the above-stated General Objections as though set forth in full. Ms. Heard further objects to this request on the basis that it is grossly overbroad and unduly burdensome to the point of harassment, particularly to the extent that it seeks information that is not calculated to lead to the discovery of information relevant to the subject matter of this action, including information related to matters beyond the scope of the asserted claims and defenses in this suit; is not reasonably calculated to lead to the discovery of admissible evidence; and calls for the production of "all" documents. Objection is also made on the basis the request seeks information from outside a reasonable time period. Objection is also made on the basis the request is vague and ambiguous, and fails to specify the documents sought with reasonable particularity. Objection is also made on the basis the request seeks documents protected from disclosure by Ms. Heard's constitutional rights, including her right to privacy and freedom of association. Objection is also made on the basis the request seeks documents protected by the constitutional rights and other privacy rights of Non-Party and/or third parties. Objection is also made on the basis the request seeks information that is otherwise available to Mr. Depp through less intrusive means by discovery directed to Ms. Heard. Objection is also made on the basis the request seeks confidential and proprietary business information and/or trade secrets of Non-Party.

**Request No. 3**

All DOCUMENTS and COMMUNICATIONS, that refer, reflect, or relate to any press releases, public statements, or other publicity related to any donations made by MS. HEARD or other PERSONS on MS. HEARD's behalf to the ACLU, from January 1, 2016 through and including the present.

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**Response to Request No. 3**

Ms. Heard incorporates by this reference the above-stated General Objections as though set forth in full. Ms. Heard further objects to this request on the basis that it is grossly overbroad and unduly burdensome to the point of harassment, particularly to the extent that it seeks information that is not calculated to lead to the discovery of information relevant to the subject matter of this action, including information related to matters beyond the scope of the asserted claims and defenses in this suit; is not reasonably calculated to lead to the discovery of admissible evidence; and calls for the production of “all” documents. Objection is also made on the basis the request seeks information from outside a reasonable time period. Objection is also made on the basis the request is vague and ambiguous, and fails to specify the documents sought with reasonable particularity. Objection is also made on the basis the request seeks documents protected from disclosure by Ms. Heard’s constitutional rights, including her right to privacy and freedom of association. Objection is also made on the basis the request seeks documents protected by the constitutional rights and other privacy rights of Non-Party and/or third parties. Objection is also made on the basis the request seeks information that is otherwise available to Mr. Depp through less intrusive means by discovery directed to Ms. Heard. Objection is also made on the basis the request seeks confidential and proprietary business information and/or trade secrets of Non-Party.

Ms. Heard further objects to this request on the grounds 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.

**Request No. 4**

All DOCUMENTS and COMMUNICATIONS concerning MS. HEARD’s role as an “ambassador” for the ACLU.

**Response to Request No. 4**

Ms. Heard incorporates by this reference the above-stated General Objections as though set forth in full. Ms. Heard further objects to this request on the basis that it is grossly overbroad and unduly burdensome to the point of harassment, particularly to the extent that it seeks

information that is not calculated to lead to the discovery of information relevant to the subject matter of this action, including information related to matters beyond the scope of the asserted claims and defenses in this suit; is not reasonably calculated to lead to the discovery of admissible evidence; and calls for the production of “all” documents. Objection is also made on the basis the request is unbound in time. Objection is also made on the basis the request is vague and ambiguous, and fails to specify the documents sought with reasonable particularity. Objection is also made on the basis the request seeks documents protected from disclosure by Ms. Heard’s constitutional rights, including her right to privacy and freedom of association. Objection is also made on the basis the request seeks documents protected by the constitutional rights and other privacy rights of Non-Party and/or third parties. Objection is also made on the basis the request seeks information that is otherwise available to Mr. Depp through less intrusive means by discovery directed to Ms. Heard. Objection is also made on the basis the request seeks confidential and proprietary business information and/or trade secrets of Non-Party.

#### **Request No. 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 relationship between MR. DEPP and MS. HEARD; (iii) the OP-ED; and/or (iv) the VIRGINIA ACTION.

#### **Response to Request No. 8**

Ms. Heard incorporates by this reference the above-stated General Objections as though set forth in full. Ms. Heard further objects to this request on the basis that it is grossly overbroad and unduly burdensome to the point of harassment, particularly to the extent that it seeks information that is not calculated to lead to the discovery of information relevant to the subject matter of this action, including information related to matters beyond the scope of the asserted claims and defenses in this suit; is not reasonably calculated to lead to the discovery of admissible evidence; and calls for the production of “all” documents. Objection is also made on the basis the request is unbound in time. Objection is also made on the basis the request is vague and ambiguous,

and fails to specify the documents sought with reasonable particularity. Objection is also made on the basis the request seeks documents protected from disclosure by Ms. Heard's constitutional rights, including her right to privacy and freedom of association. Objection is also made on the basis the request seeks documents protected by the constitutional rights and other privacy rights of Non-Party and/or third parties. Objection is also made on the basis the request seeks information that is otherwise available to Mr. Depp through less intrusive means by discovery directed to Ms. Heard. Objection is also made on the basis the request seeks confidential and proprietary business information and/or trade secrets of Non-Party.

Ms. Heard further objects to this request on the grounds 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.

Ms. Heard 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."

Ms. Heard 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.

Ms. Heard 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 Mr. Depp's Requests for Production previously served on Ms. Heard in this case (including but not limited to Request Nos. 3 of Mr. Depp's 6th Requests for Production of Documents), in response to which Ms. Heard has already produced at least 685 pages of responsive documents.

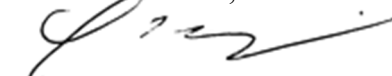
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Ms. Heard further objects to this Request seeking documents and communications concerning “the VIRGINIA ACTION” as failing to define with particularity the documents that they seek, overly broad, unduly burdensome, and seeking documents not reasonably 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 10<sup>th</sup> 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.

Dated: April 2, 2021  
New York, New York

GORDON REES SCULLY  
MANSUKHANI, LLP



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

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JOHN C. DEPP, II,

Plaintiff and  
Counterclaim  
Defendant,

(Subpoena issued pursuant to  
Uniform Interstate Deposition and  
Discovery Act)

Originating Court:  
Circuit Court of Fairfax County,  
Virginia

vs.

AMBER LAURA HEARD,

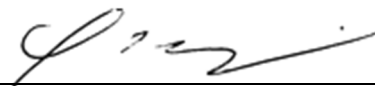
Defendant and  
Counterclaim Plaintiff.

Originating Case Number:  
No. CL-2019-02911

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**CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of the below listed documents were served  
this 2nd day of April, 2021, by email, by agreement of the parties on the attached service list.

- 1. Defendant Amber Laura Heard’s Objections to the Subpoena Duces Tecum issued by Plaintiff John C. Depp, II to Non-Party American Civil Liberties Union;**
- 2. Defendant Amber Laura Heard’s Objections to the Deposition Subpoena issued by Plaintiff John C. Depp, II to Non-Party American Civil Liberties Union;**
- 3. Defendant Amber Laura Heard’s Objections to the Subpoena Duces Tecum issued by Plaintiff John C. Depp, II to Non-Party Anthony Romero;**
- 4. Defendant Amber Laura Heard’s Objections to the Deposition Subpoena issued by Plaintiff John C. Depp, II to Non-Party Anthony Romero**

  
 \_\_\_\_\_  
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 Plaintiff Amber Laura Heard*



**SERVICE LIST***John C. Depp, II v. Amber Laura Heard*

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*Counsel for Non-Party  
American Civil Liberties Union and  
Anthony Romero*

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

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JOHN C. DEPP, II,

Plaintiff and  
Counterclaim  
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(Subpoena issued pursuant to  
Uniform Interstate Deposition and  
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Originating Court:  
Circuit Court of Fairfax County,  
Virginia

vs.

AMBER LAURA HEARD,

Defendant and  
Counterclaim Plaintiff.

Originating Case Number:  
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**DEFENDANT AND COUNTERCLAIM PLAINTIFF AMBER LAURA HEARD'S  
RESPONSES AND OBJECTIONS TO PLAINTIFF AND COUNTERCLAIM  
DEFENDANT'S DEPOSITION SUBPOENA ISSUED TO NON-PARTY ANTHONY  
ROMERO**

**PLEASE TAKE NOTICE** that Defendant and Counterclaim Plaintiff AMBER LAURA HEARD ("Ms. Heard") hereby responds and objects to the Subpoena to Person Under Foreign Subpoena issued by Plaintiff and Counterclaim Defendant JOHN C. DEPP, II ("Mr. Depp") to Non-Party ANTHONY ROMERO ("Non-Party") dated February 4, 2021 (the "Subpoena") to attend and give testimony at a deposition on March 10, 2021.

**GENERAL OBJECTIONS**

1. Ms. Heard 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. Ms. Heard objects to the Subpoena on the grounds that the deposition was unilaterally set, without first consulting counsel for Ms. Heard. 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. Ms. Heard therefore requests that, to the extent a deposition is deemed appropriate, the date of Non-Party's deposition be changed to a mutually agreeable time and date.

3. Ms. Heard objects to the Subpoena on the grounds that there is no legitimate reason for deposing Non-Party.

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

5. Ms. Heard objects to the Subpoena to the extent Mr. Depp seeks testimony that is not within the personal knowledge, custody, or control of Non-Party.

6. Ms. Heard 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 this case.

7. Ms. Heard objects to the extent the Subpoena may call for testimony of a confidential or proprietary nature, or for constitutionally-protected, private information.

8. Ms. Heard objects to the extent the Subpoena imposes obligations on Non-Party inconsistent with and/or beyond the scope imposed by CPLR § 3101(a)(4), the Uniform Interstate Deposition and Discovery Act, and all other applicable laws or rules.

9. Ms. Heard objects to the Subpoena on the grounds that it is for the purpose of harassing both Non-Party and Ms. Heard.

10. Ms. Heard objects to the to the Subpoena to the extent it seeks testimony as to information protected from disclosure by the attorney-client privilege, the work product doctrine, or any other applicable statutory or common-law privilege, prohibition, or immunity from disclosure.

11. Ms. Heard objects that Mr. Depp has provided no evidence that he seeks testimony via the Subpoena in good faith to obtain necessary and helpful information to prepare his case.

12. Ms. Heard objects to the Subpoena to the extent that it may seek to elicit premature disclosure of expert witness information or opinion.

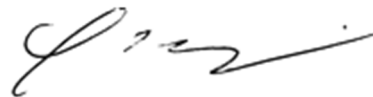
13. Ms. Heard reserves the right to raise further objections to the Subpoena.

14. Ms. Heard 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.

15. Ms. Heard expressly reserves all objections to the confidentiality, admissibility, authenticity, or relevancy of any testimony provided, and reserves all applicable claims of privilege.

Dated: April 2, 2021  
New York, New York

GORDON REES SCULLY  
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**SUPREME COURT OF THE STATE OF NEW YORK  
COUNTY OF NEW YORK**

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JOHN C. DEPP, II,

Plaintiff and  
Counterclaim  
Defendant,

(Subpoena issued pursuant to  
Uniform Interstate Deposition and  
Discovery Act)

Originating Court:  
Circuit Court of Fairfax County,  
Virginia

vs.

AMBER LAURA HEARD,

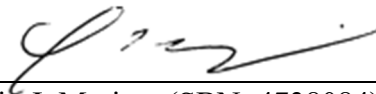
Defendant and  
Counterclaim Plaintiff.

Originating Case Number:  
No. CL-2019-02911

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**CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of the below listed documents were served this 2nd day of April, 2021, by email, by agreement of the parties on the attached service list.

- 1. Defendant Amber Laura Heard’s Objections to the Subpoena Duces Tecum issued by Plaintiff John C. Depp, II to Non-Party American Civil Liberties Union;**
- 2. Defendant Amber Laura Heard’s Objections to the Deposition Subpoena issued by Plaintiff John C. Depp, II to Non-Party American Civil Liberties Union;**
- 3. Defendant Amber Laura Heard’s Objections to the Subpoena Duces Tecum issued by Plaintiff John C. Depp, II to Non-Party Anthony Romero;**
- 4. Defendant Amber Laura Heard’s Objections to the Deposition Subpoena issued by Plaintiff John C. Depp, II to Non-Party Anthony Romero**

  
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