

# **Exhibit E**

**Schwartz, Michael (x2252)**

---

**From:** Schwartz, Michael (x2252)  
**Sent:** Thursday, March 18, 2021 5:08 PM  
**To:** Meyers, Jessica N.  
**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 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**

Patterson Belknap Webb & Tyler LLP  
1133 Avenue of the Americas  
New York, NY 10036  
(212) 336-2252  
[mschwartz@pbwt.com](mailto:mschwartz@pbwt.com)

---

**From:** Meyers, Jessica N. <[JMeyers@brownrudnick.com](mailto:JMeyers@brownrudnick.com)>  
**Sent:** Tuesday, March 16, 2021 12:33 PM  
**To:** Schwartz, Michael (x2252) <[mschwartz@pbwt.com](mailto:mschwartz@pbwt.com)>; Chew, Benjamin G. <[BCheW@brownrudnick.com](mailto:BCheW@brownrudnick.com)>  
**Cc:** Crawford, Andrew C. <[ACrawford@brownrudnick.com](mailto:ACrawford@brownrudnick.com)>; Vasquez, Camille M. <[CVasquez@brownrudnick.com](mailto:CVasquez@brownrudnick.com)>; Teplin, Stephanie (x2543) <[steplin@pbwt.com](mailto: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!**

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 15<sup>th</sup> and look forward to an update from you this coming Thursday.

Best,  
Jess

---

**From:** Schwartz, Michael (x2252) <[mschwartz@pbwt.com](mailto:mschwartz@pbwt.com)>  
**Sent:** Thursday, March 11, 2021 11:03 AM  
**To:** Meyers, Jessica N. <[JMeyers@brownrudnick.com](mailto:JMeyers@brownrudnick.com)>; Chew, Benjamin G. <[BCheW@brownrudnick.com](mailto:BCheW@brownrudnick.com)>  
**Cc:** Crawford, Andrew C. <[ACrawford@brownrudnick.com](mailto:ACrawford@brownrudnick.com)>; Vasquez, Camille M. <[CVasquez@brownrudnick.com](mailto:CVasquez@brownrudnick.com)>;  
Teplin, Stephanie (x2543) <[steplin@pbwt.com](mailto: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 E-mail. Use caution accessing links or attachments.**

---

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

---

**Michael D. Schwartz**  
Patterson Belknap Webb & Tyler LLP  
1133 Avenue of the Americas  
New York, NY 10036  
(212) 336-2252  
[mschwartz@pbwt.com](mailto:mschwartz@pbwt.com)

---

**From:** Meyers, Jessica N. <[JMeyers@brownrudnick.com](mailto:JMeyers@brownrudnick.com)>  
**Sent:** Thursday, March 11, 2021 10:52 AM  
**To:** Schwartz, Michael (x2252) <[mschwartz@pbwt.com](mailto:mschwartz@pbwt.com)>; Chew, Benjamin G. <[BCheW@brownrudnick.com](mailto:BCheW@brownrudnick.com)>  
**Cc:** Crawford, Andrew C. <[ACrawford@brownrudnick.com](mailto:ACrawford@brownrudnick.com)>; Vasquez, Camille M. <[CVasquez@brownrudnick.com](mailto:CVasquez@brownrudnick.com)>;  
Teplin, Stephanie (x2543) <[steplin@pbwt.com](mailto: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 16<sup>th</sup> work for your team? If so, I can circulate a calendar invite and dial-in.

Best,  
Jess

---

**From:** Schwartz, Michael (x2252) <[mschwartz@pbwt.com](mailto:mschwartz@pbwt.com)>  
**Sent:** Thursday, March 11, 2021 9:55 AM  
**To:** Meyers, Jessica N. <[JMeyers@brownrudnick.com](mailto:JMeyers@brownrudnick.com)>; Chew, Benjamin G. <[BCheW@brownrudnick.com](mailto:BCheW@brownrudnick.com)>  
**Cc:** Crawford, Andrew C. <[ACrawford@brownrudnick.com](mailto:ACrawford@brownrudnick.com)>; Vasquez, Camille M. <[CVasquez@brownrudnick.com](mailto:CVasquez@brownrudnick.com)>

Teplin, Stephanie (x2543) <[steplin@pbwt.com](mailto: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 E-mail. Use caution accessing links or attachments.**

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**

Patterson Belknap Webb & Tyler LLP  
1133 Avenue of the Americas  
New York, NY 10036  
(212) 336-2252  
[mschwartz@pbwt.com](mailto:mschwartz@pbwt.com)

**From:** Meyers, Jessica N. <[JMeyers@brownrudnick.com](mailto:JMeyers@brownrudnick.com)>

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

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

**Cc:** Crawford, Andrew C. <[ACrawford@brownrudnick.com](mailto:ACrawford@brownrudnick.com)>; Vasquez, Camille M. <[CVasquez@brownrudnick.com](mailto:CVasquez@brownrudnick.com)>;

Teplin, Stephanie (x2543) <[steplin@pbwt.com](mailto: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

Brown Rudnick LLP  
Seven Times Square  
New York, NY 10036  
T: 212-209-4938  
F: 212-938-2955  
jmeyers@brownrudnick.com  
[www.brownrudnick.com](http://www.brownrudnick.com)

Please consider the environment before printing this e-mail

---

**From:** Schwartz, Michael (x2252) <[mschwartz@pbwt.com](mailto:mschwartz@pbwt.com)>  
**Sent:** Wednesday, March 3, 2021 4:03 PM  
**To:** Chew, Benjamin G. <[BChew@brownrudnick.com](mailto:BChew@brownrudnick.com)>  
**Cc:** Crawford, Andrew C. <[ACrawford@brownrudnick.com](mailto:ACrawford@brownrudnick.com)>; Vasquez, Camille M. <[CVasquez@brownrudnick.com](mailto:CVasquez@brownrudnick.com)>; Meyers, Jessica N. <[JMeyers@brownrudnick.com](mailto:JMeyers@brownrudnick.com)>; Teplin, Stephanie (x2543) <[steplin@pbwt.com](mailto: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 E-mail. Use caution accessing links or attachments.**

---

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

---

**Michael D. Schwartz**

Patterson Belknap Webb & Tyler LLP  
1133 Avenue of the Americas  
New York, NY 10036  
(212) 336-2252  
[mschwartz@pbwt.com](mailto:mschwartz@pbwt.com)

---

**From:** Chew, Benjamin G. <[BChew@brownrudnick.com](mailto:BChew@brownrudnick.com)>  
**Sent:** Wednesday, March 3, 2021 3:11 PM  
**To:** Schwartz, Michael (x2252) <[mschwartz@pbwt.com](mailto:mschwartz@pbwt.com)>  
**Cc:** Crawford, Andrew C. <[ACrawford@brownrudnick.com](mailto:ACrawford@brownrudnick.com)>; Vasquez, Camille M. <[CVasquez@brownrudnick.com](mailto:CVasquez@brownrudnick.com)>; Meyers, Jessica N. <[JMeyers@brownrudnick.com](mailto:JMeyers@brownrudnick.com)>; Teplin, Stephanie (x2543) <[steplin@pbwt.com](mailto:steplin@pbwt.com)>  
**Subject:** John C. Depp, II v. Amber Laura Heard, Originating Case No. CL-2019-23911 (V.A. Cir. Ct. Fairfax Cnty.)

**Caution: External Email!**

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

**brownrudnick**

**Benjamin G. Chew**

Partner

Brown Rudnick LLP  
601 Thirteenth Street NW Suite 600  
Washington, DC 20005  
T: 202-536-1785  
F: 617-289-0717  
bchew@brownrudnick.com  
[www.brownrudnick.com](http://www.brownrudnick.com)



Fellow,  
American College  
of Trial Lawyers

Please consider the environment before printing this e-mail

---

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

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

**To:** Chew, Benjamin G. <[BChew@brownrudnick.com](mailto:BChew@brownrudnick.com)>

**Cc:** Crawford, Andrew C. <[ACrawford@brownrudnick.com](mailto:ACrawford@brownrudnick.com)>; Vasquez, Camille M. <[CVasquez@brownrudnick.com](mailto:CVasquez@brownrudnick.com)>; Meyers, Jessica N. <[JMeyers@brownrudnick.com](mailto:JMeyers@brownrudnick.com)>; Teplin, Stephanie (x2543) <[steplin@pbwt.com](mailto: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 E-mail. Use caution accessing links or attachments.**

---

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**

Patterson Belknap Webb & Tyler LLP  
1133 Avenue of the Americas  
New York, NY 10036  
(212) 336-2252  
[mschwartz@pbwt.com](mailto:mschwartz@pbwt.com)

---

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

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

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

**Cc:** Crawford, Andrew C. <[ACrawford@brownrudnick.com](mailto:ACrawford@brownrudnick.com)>; Vasquez, Camille M. <[CVasquez@brownrudnick.com](mailto:CVasquez@brownrudnick.com)>; Meyers, Jessica N. <[JMeyers@brownrudnick.com](mailto:JMeyers@brownrudnick.com)>; Teplin, Stephanie (x2543) <[steplin@pbwt.com](mailto: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

**brownrudnick**

**Benjamin G. Chew**

Partner

Brown Rudnick LLP  
601 Thirteenth Street NW Suite 600  
Washington, DC 20005  
T: 202-536-1785  
F: 617-289-0717  
[bchew@brownrudnick.com](mailto:bchew@brownrudnick.com)  
[www.brownrudnick.com](http://www.brownrudnick.com)



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

**brownrudnick**

**Benjamin G. Chew**

Partner

Brown Rudnick LLP  
601 Thirteenth Street NW Suite 600  
Washington, DC 20005  
T: 202-536-1785  
F: 617-289-0717  
[bchew@brownrudnick.com](mailto:bchew@brownrudnick.com)  
[www.brownrudnick.com](http://www.brownrudnick.com)

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](mailto:ebredehoft@cbclaw.com)  
**Subject:** 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.**

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  
1133 Avenue of the Americas  
New York, NY 10036  
(212) 336-2252  
[mschwartz@pbwt.com](mailto:mschwartz@pbwt.com)

Privileged/Confidential Information may be contained in this message. If you are not the addressee indicated in this message (or responsible for delivery of the message to such person), you may not copy or deliver this message to anyone. In such case, you should destroy this message and kindly notify the sender by reply email. Please advise immediately if you or your employer do not consent to receiving email messages of this kind.

\*\*\*\*\*

The information contained in this electronic message may be legally privileged and confidential under applicable law, and is intended only for the use of the individual or entity named above. If the recipient of this message is not the above-named intended recipient, you are hereby notified that any dissemination, copy or disclosure of this communication is strictly prohibited. If you have received this communication in error, please notify Brown Rudnick LLP, (617) 856-8200 (if dialing from outside the US, 001-(617)-856-8200) and purge the communication immediately without making any copy or distribution.

To the extent Brown Rudnick is a "controller" of the "personal data" (as each term is defined in the European General Data Protection Regulation (EU/2016/679) or in the UK's Data Protection Act 2018) you have provided to us in this and other communications between us, please see our privacy statement and summary [here](#) which sets out details of the controller, the personal data we have collected, the purposes for which we use it (including any legitimate interests on which we rely), the persons to whom we may transfer the data and when and how we intend to transfer it outside the European Economic Area.

\*\*\*\*\*

Privileged/Confidential Information may be contained in this message. If you are not the addressee indicated in this message (or responsible for delivery of the message to such person), you may not copy or deliver this message to anyone. In such case, you should destroy this message and kindly notify the sender by reply email. Please advise

immediately if you or your employer do not consent to receiving email messages of this kind.

\*\*\*\*\*

The information contained in this electronic message may be legally privileged and confidential under applicable law, and is intended only for the use of the individual or entity named above. If the recipient of this message is not the above-named intended recipient, you are hereby notified that any dissemination, copy or disclosure of this communication is strictly prohibited. If you have received this communication in error, please notify Brown Rudnick LLP, (617) 856-8200 (if dialing from outside the US, 001-(617)-856-8200) and purge the communication immediately without making any copy or distribution.

To the extent Brown Rudnick is a "controller" of the "personal data" (as each term is defined in the European General Data Protection Regulation (EU/2016/679) or in the UK's Data Protection Act 2018) you have provided to us in this and other communications between us, please see our privacy statement and summary [here](#) which sets out details of the controller, the personal data we have collected, the purposes for which we use it (including any legitimate interests on which we rely), the persons to whom we may transfer the data and when and how we intend to transfer it outside the European Economic Area.

\*\*\*\*\*

Privileged/Confidential Information may be contained in this message. If you are not the addressee indicated in this message (or responsible for delivery of the message to such person), you may not copy or deliver this message to anyone. In such case, you should destroy this message and kindly notify the sender by reply email. Please advise immediately if you or your employer do not consent to receiving email messages of this kind.

\*\*\*\*\*

The information contained in this electronic message may be legally privileged and confidential under applicable law, and is intended only for the use of the individual or entity named above. If the recipient of this message is not the above-named intended recipient, you are hereby notified that any dissemination, copy or disclosure of this communication is strictly prohibited. If you have received this communication in error, please notify Brown Rudnick LLP, (617) 856-8200 (if dialing from outside the US, 001-(617)-856-8200) and purge the communication immediately without making any copy or distribution.

To the extent Brown Rudnick is a "controller" of the "personal data" (as each term is defined in the European General Data Protection Regulation (EU/2016/679) or in the UK's Data Protection Act 2018) you have provided to us in this and other communications between us, please see our privacy statement and summary [here](#) which sets out details of the controller, the personal data we have collected, the purposes for which we use it (including any legitimate interests on which we rely), the persons to whom we may transfer the data and when and how we intend to transfer it outside the European Economic Area.

\*\*\*\*\*

Privileged/Confidential Information may be contained in this message. If you are not the addressee indicated in this message (or responsible for delivery of the message to such person), you may not copy or deliver this message to anyone. In such case, you should destroy this message and kindly notify the sender by reply email. Please advise immediately if you or your employer do not consent to receiving email messages of this kind.

\*\*\*\*\*

The information contained in this electronic message may be legally privileged and confidential under applicable law, and is intended only for the use of the individual or entity named above. If the recipient of this message is not the above-named intended recipient, you are hereby notified that any dissemination, copy or disclosure of this communication is strictly prohibited. If you have received this communication in error, please notify Brown Rudnick LLP, (617) 856-8200 (if dialing from outside the US, 001-(617)-856-8200) and purge the communication immediately without making any copy or distribution.

To the extent Brown Rudnick is a "controller" of the "personal data" (as each term is defined in the European General Data Protection Regulation (EU/2016/679) or in the UK's Data Protection Act 2018) you have provided to us in this and other communications between us, please see our privacy statement and summary [here](#) which sets out details of the controller, the personal data we have collected, the purposes for which we use it (including any legitimate interests on which we rely), the persons to whom we may transfer the data and when and how we intend to transfer it outside the European Economic Area.

\*\*\*\*\*

---

Privileged/Confidential Information may be contained in this message. If you are not the addressee indicated in this message (or responsible for delivery of the message to such person), you may not copy or deliver this message to anyone. In such case, you should destroy this message and kindly notify the sender by reply email. Please advise immediately if you or your employer do not consent to receiving email messages of this kind.

---

\*\*\*\*\*

The information contained in this electronic message may be legally privileged and confidential under applicable law, and is intended only for the use of the individual or entity named above. If the recipient of this message is not the above-named intended recipient, you are hereby notified that any dissemination, copy or disclosure of this communication is strictly prohibited. If you have received this communication in error, please notify Brown Rudnick LLP, (617) 856-8200 (if dialing from outside the US, 001-(617)-856-8200) and purge the communication immediately without making any copy or distribution.

To the extent Brown Rudnick is a "controller" of the "personal data" (as each term is defined in the European General Data Protection Regulation (EU/2016/679) or in the UK's Data Protection Act 2018) you have provided to us in this and other communications between us, please see our privacy statement and summary [here](#) which sets out details of the controller, the personal data we have collected, the purposes for which we use it (including any legitimate interests on which we rely), the persons to whom we may transfer the data and when and how we intend to transfer it outside the European Economic Area.

\*\*\*\*\*