

# EXHIBIT 4

**Meyers, Jessica N.**

---

**From:** Meyers, Jessica N.  
**Sent:** Tuesday, June 1, 2021 7:32 PM  
**To:** Schwartz, Michael (x2252); Chew, Benjamin G.; Crawford, Andrew C.; Vasquez, Camille M.  
**Cc:** Teplin, Stephanie (x2543)  
**Subject:** RE: Depp v. ACLU, Index No. 154545/2021 (N.Y. Sup. Ct.)

Hi Mike,

I appreciate that you have reviewed our Petition and supporting papers and reconsidered the ACLU's position. However, as should be clear from our petition and supporting papers, we already have the information you are proposing to stipulate to. What we are seeking by the Subpoenas to the ACLU Witnesses, among other things, are the communications and documentation surrounding many of the donations and pledges you identified in the proposed stipulation so that they may be understood in context. Your proposed stipulation does not provide any such context and is, therefore, not an acceptable substitute for the materials we seek by the Subpoenas to the ACLU Witnesses.

Additionally, as we explain in our Petition and our supporting papers, the ACLU's reticence to produce the materials requested by the Subpoenas appears to be part of a concerted effort with Ms. Heard and her counsel to serve and protect her interests in Virginia Litigation. The proposed stipulation appears tailored to the same end by, for example, including donations to the ACLU that were not made by Ms. Heard from her divorce settlement. The proposed stipulation is, accordingly, unacceptable in its current form.

We are willing to discuss the ACLU Witnesses stipulating to certain facts to minimize the burden on the ACLU Witnesses in connection with the requested document productions and depositions. Any such stipulation, however, could not be in lieu of the entirety of the discovery Mr. Depp seeks by the Subpoenas to the ACLU Witnesses. Indeed, without the production of documents and depositions sought by the Subpoenas, any stipulation would have no evidentiary value in the Virginia Court. If you would like to discuss the contours of a potential stipulation, we can make ourselves available as early as this week, but you should plan on filing the ACLU Witnesses' opposition to Mr. Depp's Petition this Friday, June 4<sup>th</sup>.

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)

---

**From:** Schwartz, Michael (x2252) <mschwartz@pbwt.com>  
**Sent:** Thursday, May 27, 2021 2:26 PM  
**To:** Meyers, Jessica N. <JMeyers@brownrudnick.com>; Chew, Benjamin G. <BChew@brownrudnick.com>; Crawford, Andrew C. <ACrawford@brownrudnick.com>; Vasquez, Camille M. <CVasquez@brownrudnick.com>

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

**Subject:** Depp v. ACLU, Index No. 154545/2021 (N.Y. Sup. Ct.)

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

---

Counsel,

We have reviewed your Petition and the supporting memorandum of law and exhibits. While we disagree with many of your arguments, we believe there is no serious dispute on what donations were made to the ACLU by Ms. Heard or others on her behalf, and when those donations were made. We reiterate our position that Ms. Heard's donations are irrelevant to the issues in the Virginia litigation, but are willing to stipulate to the facts of the donations to avoid unnecessary burdens on our clients and the Court.

Attached is a draft stipulation that describes the dates and amounts of donations to the ACLU by Ms. Heard or others on her behalf, based on the ACLU's review of relevant books and records. Please let us know if you are willing to stipulate to these facts. As you know, our opposition is due on June 4, so please provide your position by close of business on Tuesday, June 1. We're available to discuss if it would be helpful.

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)

---

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.

---