

EXHIBIT 5

Facebook Messenger, WhatsApp, WeChat, Slack, Twitter, Skype, Instagram, Kik, Signal, Telegram, Viber, Threema, Dust, and Wickr.

3. The term “Communication” shall mean every written or oral manner of transmitting or receiving facts, ideas, information and opinions, including, without limitation: correspondence; telexes; telecopies; electronic mail; all attachments and enclosures thereto; text messages; computer tapes; discs; telephone tape recordings; recordings of any other type in any medium of written or oral communications; phone logs; message logs; and notes and memoranda of, referring to, or relating to, written or oral communications.

4. The term “Divorce Action” shall mean and refer to the dissolution proceeding entitled *In re the Marriage of Amber Laura Depp and John Christopher Depp II*, Los Angeles Superior Court Case No. BD641052.

5. “Document” and “Documents” are used in their broadest possible sense within the meaning under law and shall include by way of example, but not limitation, any written, printed, typed, spoken, computerized, or other graphic, phonic, or recorded matter of any kind or nature, however produced or reproduced, whether sent or received or neither, including drafts and copies bearing notations or marks not found on the original, including the following:

- a. all contracts, agreements, representations, warranties, certificates, and opinions;
- b. all letters or other forms of correspondence or communication, including electronic mail, facsimiles, envelopes, notes, memoranda, telegrams, cables, text messages, voice-mail messages, messages sent or received via social media platform, and messages (including reports, notes, notations, diary entries, and memoranda or other records of or relating to telephone conversations or conferences);

c. all memoranda, reports, financial statements, valuations, reports, notes, transcripts, tabulations, studies, analyses, evaluations, projections, work papers, notebooks, corporate or other records or copies thereof, lists, comparisons, questionnaires, surveys, charts, curves, graphs, summaries, extracts, statistical records, and compilations;

d. all desk and pocket calendars, appointment books, diaries, and logs;

e. all books, scrapbooks, articles, speeches, press releases, magazines, newspapers, booklets, circulars, bulletins, notices, instructions, brochures, and manuals;

f. all transcripts or records of meetings, discussions, or conferences, including tape recordings and minutes;

g. all photographs, microfilm, microfiche, phonographs, tapes or other records, punch cards, magnetic tapes, disks, data cells, drums, printouts, and other electronic, computerized, or other data compilations from which information can or may be obtained; and

h. all presentation materials, including computer generated or other electronic presentation pages, slides, overhead projections overlays, handouts, pamphlets, charts, posters, films, and videos.

6. The term “Mr. Depp” shall mean and refer to Plaintiff John C. Depp, II and all persons acting on his behalf, including but not limited to his agents, representatives, employees, and assigns.

7. The terms “Ms. Heard” and/or “You” or “Your” shall mean and refer to Defendant Amber Laura Heard and all Persons or entities acting on her behalf or under her control, including but not limited to her agents, representatives, employees, and assigns.

8. The term “Op-ed” shall mean the writing submitted by Ms. Heard in December 2018 for publication in the Washington Post, which is the subject, at least in part, of the Action.

9. The term “Person” shall mean any natural person or any business, legal, or government entity, or association.

10. The term “UK Action” shall mean and refer to the litigation between Mr. Depp and News Group Newspapers Limited, before the High Court of Justice, Queen’s Bench Division, the subject matter of which included, at least in part, the relationship between You and Mr. Depp.

11. The term “NGN” shall mean News Group Newspapers Limited.

12. The terms “concerning,” “relating to,” “referring to,” “pertaining to,” “reflecting,” “evidencing,” and “constituting” are used, for purposes of these requests, as equivalent terms, each including the others.

13. In order to bring matters within the scope of these requests which might otherwise be construed to be outside their scope:

- a. “each” includes the word “every,” and “every” includes the word “each”;
- b. “any” includes the word “all,” and “all” includes the work “any”;
- c. “and,” “or” or “and/or” shall be construed conjunctively or disjunctively as necessary to make the request inclusive rather than exclusive;
- d. “all” shall also include “each of” and vice-versa; and
- e. the singular includes the plural and vice-versa.

14. All words, terms and phrases not specifically defined in these requests are to be given their normal and customary meaning in the context in which they are used herein.

Instructions

1. You are requested to produce all responsive documents in your possession, custody or control, wherever located, including, without limitation, those in the custody of your

attorneys, agents, representatives and affiliates.

2. You shall provide a written response to each request herein.

3. The request shall be deemed to be continuing and you are required to promptly produce in the form of a supplemental document production any document requested herein that is unavailable to you at the time of the production called for, but which becomes available to you or your attorneys, agents or representatives up to the conclusion of the proceedings herein. The date such additional documents came into your possession shall be specified, as well as the identity of the individuals who furnished such additional documents to the person preparing the response.

4. If any part of the following requests cannot be responded to in full, please respond to the extent possible, specifying the reason(s) for your inability to respond to the remainder and stating whatever information or knowledge you have concerning the portion to which you do not respond.

5. If an objection is made to any request contained herein, for each item or category objected to:

- a) State the specific ground for each objection;
- b) Identify each such document by giving its date, the name of each author (and each address or, if different), the name of each addressee (and each recipient, if different), and by giving any other information necessary to identify such document or part thereof; and
- c) Provide a description of the subject matter of each document or item.

Any ground not stated in an objection within the time frame provided by the relevant rule, or any extensions thereof, shall be waived.

6. If there are no documents in existence that are requested in a particular paragraph of this request, the Response must include a statement to that effect in writing.

7. Where any copy of any document whose production is sought herein, whether a draft or final version, is not identical to any copy thereof, by reason of alterations, notes, comments, initials, underscoring, indication of routing, or other material contained thereon or attached thereto, all such non-identical copies are to be produced separately.

8. If any document requested herein was formerly in your possession, custody or control (or that of your representative) and has been lost or destroyed or otherwise disposed of, you are requested to submit in lieu of any such document a written statement (a) describing in detail the nature of the document and its contents, including the document's date, subject matter, number of pages, and attachments and appendices, (b) identifying the person(s) who prepared or authored the document and, if applicable, the person(s) to whom the document was sent, distributed, shown, or explained, (c) specifying the date on which the document was prepared or transmitted, (d) specifying the date on which the document was lost or destroyed and, if destroyed, the conditions of and reasons for such destruction and the person(s) requesting and performing the destruction, and (e) where the document was maintained prior to its destruction.

9. Hard copies of all documents should be produced, in addition, copies of all documents available electronically should be delivered on a DVD or CD-ROM.

10. A request for any document shall be deemed to include a request for any and all transmittal sheets, cover letters, exhibits, enclosures, or attachments to such document, in addition to the document in its full and unexpurgated form.

11. Documents should be segregated according to the number of the request to which you are responding or produced in the manner they are kept in the ordinary course of business. Documents attached to each other should not be separated.

12. With the exception of any spreadsheets or database documents (e.g. documents

created on software such as Microsoft Excel or Microsoft Access), which shall be produced in their native format, all electronically-stored information ("ESI") images shall be produced in one of the following formats: CCITT Group 4, Single-Paged TIFF files or Single-Paged JPG files with an Opticon image load file. A Concordance DAT metadata load file of all such ESI shall also be provided with a link to the text files and shall contain extractable metadata, including at least the following: Beginning Bates, Ending Bates, Beginning Bates Attachment, Ending Bates Attachment, Custodian, File Name, From, Recipient, CC, BCC, Subject, Date Sent, Time Sent, Last Modified Date, Author, Title, Date Created, Time Created, Document Extension, Page Count, MD5Hash, Text Path and Native File Path. The text file format shall be Multi-Paged Document level text files. In addition, if documents are produced with slip-sheets, please include the native file, as well as links to the natives in the DAT file. Hard copy documents or any documents or things that do not qualify as ESI shall be scanned and produced in single page TIFF format with separate OCR files for each document, and shall be included in the load file for ESI.

13. If any privilege is claimed as to any communication requested or sought to be identified herein:

- a) State the nature of the privilege of the claim (i.e., attorney/client, work product, etc.),
- b) State the name of the party claiming privilege and the name of the attorney, if any, with respect to whom the privilege is claimed,
- c) State the basis for claiming the privilege as to the specific communication,
- d) Identify all persons present at any communication to which privilege is claimed and all persons to whom the subject matter of the communication was discussed or disclosed, and
- e) State the date of each such communication.

14. If any privilege is claimed as to any document requested or sought to be identified

herein:

- a) State the nature of the privilege claimed (i.e., attorney/client, work product, etc.),
- b) State the basis for claiming the privilege as to the specific information or documents, and
- c) State the date of such document, identify the type of document (i.e., letter, memo, etc.), set forth the subject matter thereof, identify each person who prepared it and each person (if any) who signed it, identify each person to whom it was directed, circulated or shown, and identify each person now in possession of the document.

15. For purposes of each document request, each such request for documents to be produced by you expressly includes documents in the possession of your attorneys, and any consultants or experts retained by you or your attorneys in connection with this action.

16. Produce all responsive documents as they are kept in the usual course of business or organize and label them to correspond with the categories in this request.

17. Plaintiff hereby reserves the right to expand or supplement all requests for information and documents set forth herein.

REQUESTS FOR PRODUCTION

1. All photographs, pictures, and any other Documents that evidence, reflect, or depict any physical or other injuries You contend that You have sustained as a result of any action by Mr. Depp, including all associated metadata.

RESPONSE:

2. All Documents and/or Communications that refer, reflect, or relate to any purported act of violence or attempted violence involving Mr. Depp.

RESPONSE:

3. All Documents and/or Communications that refer, reflect, or relate to any physical or mental injuries You contend You have ever sustained as a result of any act of violence involving Mr. Depp.

RESPONSE:

4. All Documents and/or Communications that refer, reflect, or relate to any treatment You have ever received for any physical or mental injuries You sustained as a result of any act of violence involving Mr. Depp.

RESPONSE:

5. All Communications between You and any other Person regarding this Action and/or the subject matter thereof.

RESPONSE:

6. All Communications between You and any other Person regarding the Divorce Action and/or the subject matter thereof.

RESPONSE:

7. All Documents and/or Communications between You and any other Person pertaining to any act of violence, or attempted acts of violence by You or Mr. Depp in the past 10 years.

RESPONSE:

8. All Communications between You and Raquel Pennington that refer or relate to Your relationship with Mr. Depp, including without limitation any Communications that refer or relate to the Action, the Divorce Action, the U.K. Action, any claims of abuse or violence involving Mr. Depp, and any injuries You contend You suffered as a result of any conduct by Mr. Depp.

RESPONSE:

9. All Communications between You and iO Tillett Wright that refer or relate to Your relationship with Mr. Depp, including without limitation any Communications that refer or relate to the Action, the Divorce Action, the U.K. Action, any claims of abuse or violence involving Mr. Depp, and any injuries You contend You suffered as a result of any conduct by Mr. Depp.

RESPONSE:

10. All Communications between You and Elizabeth Marz that refer or relate to Your relationship with Mr. Depp, including without limitation any Communications that refer or relate to the Action, the Divorce Action, the U.K. Action, any claims of abuse or violence involving Mr. Depp, and any injuries You contend You suffered as a result of any conduct by Mr. Depp.

RESPONSE:

11. All Communications between You and Whitney Henriquez that refer or relate to Your relationship with Mr. Depp, including without limitation any Communications that refer or relate to the Action, the Divorce Action, the U.K. Action, any claims of abuse or violence involving Mr. Depp, and any injuries You contend You suffered as a result of any conduct by Mr. Depp.

RESPONSE:

12. All Communications between You and Josh Drew that refer or relate to Your relationship with Mr. Depp, including without limitation any Communications that refer or relate to the Action, the Divorce Action, the U.K. Action, any claims of abuse or violence involving Mr. Depp, and any injuries You contend You suffered as a result of any conduct by Mr. Depp.

RESPONSE:

13. All Communications between You and Jodi Gottlieb that refer or relate to Your relationship with Mr. Depp, including without limitation any Communications that refer or relate to the Action, the Divorce Action, the U.K. Action, any claims of abuse or violence involving Mr. Depp, and any injuries You contend You suffered as a result of any conduct by Mr. Depp.

RESPONSE:

14. All Communications between You and Amanda de Cadenet that refer or relate to Your relationship with Mr. Depp, including without limitation any Communications that refer or relate to the Action, the Divorce Action, the U.K. Action, any claims of abuse or violence involving Mr. Depp, and any injuries You contend You suffered as a result of any conduct by Mr. Depp.

RESPONSE:

15. All Communications between You and Brandon McCulloch that refer or relate to Your relationship with Mr. Depp, including without limitation any Communications that refer or relate to the Action, the Divorce Action, the U.K. Action, any claims of abuse or violence involving Mr. Depp, and any injuries You contend You suffered as a result of any conduct by Mr. Depp.

RESPONSE:

16. All Communications between You and Connell Cowan that refer or relate to Your relationship with Mr. Depp, including without limitation any Communications that refer or relate to the Action, the Divorce Action, the U.K. Action, any claims of abuse or violence involving Mr. Depp, and any injuries You contend You suffered as a result of any conduct by Mr. Depp.

RESPONSE:

17. All Documents that evidence or reflect any treatment You have received from Connell Cowan in connection with Your relationship with Mr. Depp.

RESPONSE:

18. All Communications between You and Connell Cowan that refer or relate to Your relationship with Mr. Depp, including without limitation any Communications that refer or relate to the Action, the Divorce Action, the U.K. Action, any claims of abuse or violence involving Mr. Depp, and any injuries You contend You suffered as a result of any conduct by Mr. Depp.

RESPONSE:

19. All Communications between You and David Heard that refer or relate to Your relationship with Mr. Depp, including without limitation any Communications that refer or relate to the Action, the Divorce Action, the U.K. Action, any claims of abuse or violence involving Mr. Depp, and any injuries You contend You suffered as a result of any conduct by Mr. Depp.

RESPONSE:

20. All Communications between You and Paige Heard that refer or relate to Your relationship with Mr. Depp, including without limitation any Communications that refer or relate to the Action, the Divorce Action, the U.K. Action, any claims of abuse or violence involving Mr. Depp, and any injuries You contend You suffered as a result of any conduct by Mr. Depp.

RESPONSE:

21. All Communications between You and Debbie Lloyd that refer or relate to Your relationship with Mr. Depp, including without limitation any Communications that refer or relate to the Action, the Divorce Action, the U.K. Action, any claims of abuse or violence involving Mr. Depp, and any injuries You contend You suffered as a result of any conduct by Mr. Depp.

RESPONSE:

22. All Communications between You and Tasya van Reé that refer or relate to Your relationship with Mr. Depp, including without limitation any Communications that refer or relate to the Action, the Divorce Action, the U.K. Action, any claims of abuse or violence involving Mr. Depp, and any injuries You contend You suffered as a result of any conduct by Mr. Depp.

RESPONSE:

23. All Communications between You and Erin Boerum that refer or relate to Your relationship with Mr. Depp, including without limitation any Communications that refer or relate to the Action, the Divorce Action, the U.K. Action, any claims of abuse or violence involving Mr. Depp, and any injuries You contend You suffered as a result of any conduct by Mr. Depp.

RESPONSE:

24. All Communications between You and Jessica Weitz that refer or relate to Your relationship with Mr. Depp, including without limitation any Communications that refer or relate to the Action, the Divorce Action, the U.K. Action, any claims of abuse or violence involving Mr. Depp, and any injuries You contend You suffered as a result of any conduct by Mr. Depp.

RESPONSE:

25. All Communications between You and Kevin Murphy that refer or relate to Your relationship with Mr. Depp, including without limitation any Communications that refer or relate to the Action, the Divorce Action, the U.K. Action, any claims of abuse or violence involving Mr. Depp, and any injuries You contend You suffered as a result of any conduct by Mr. Depp.

RESPONSE:

26. All Communications between You and Laura Divenere that refer or relate to Your relationship with Mr. Depp, including without limitation any Communications that refer or relate

to the Action, the Divorce Action, the U.K. Action, any claims of abuse or violence involving Mr. Depp, and any injuries You contend You suffered as a result of any conduct by Mr. Depp.

RESPONSE:

27. All Communications between You and Kristina Sexton that refer or relate to Your relationship with Mr. Depp, including without limitation any Communications that refer or relate to the Action, the Divorce Action, the U.K. Action, any claims of abuse or violence involving Mr. Depp, and any injuries You contend You suffered as a result of any conduct by Mr. Depp.

RESPONSE:

28. All Communications between You and Bonnie Jacobs that refer or relate to Your relationship with Mr. Depp, including without limitation any Communications that refer or relate to the Action, the Divorce Action, the U.K. Action, any claims of abuse or violence involving Mr. Depp, and any injuries You contend You suffered as a result of any conduct by Mr. Depp.

RESPONSE:

29. All Documents that evidence or reflect any treatment You have received from Bonnie Jacobs in connection with Your relationship with Mr. Depp.

RESPONSE:

30. All Communications between You and Laurel Anderson that refer or relate to Your relationship with Mr. Depp, including without limitation any Communications that refer or relate to the Action, the Divorce Action, the U.K. Action, any claims of abuse or violence involving Mr. Depp, and any injuries You contend You suffered as a result of any conduct by Mr. Depp.

RESPONSE:

31. All Documents that evidence or reflect any treatment You have received from Laurel Anderson in connection with Your relationship with Mr. Depp.

RESPONSE:

32. All Communications between You and Amy Banks that refer or relate to Your relationship with Mr. Depp, including without limitation any Communications that refer or relate to the Action, the Divorce Action, the U.K. Action, any claims of abuse or violence involving Mr. Depp, and any injuries You contend You suffered as a result of any conduct by Mr. Depp.

RESPONSE:

33. All Documents that evidence or reflect any treatment You have received from Amy Banks in connection with Your relationship with Mr. Depp.

RESPONSE:

34. All Communications between You and Joseph Sugerman that refer or relate to Your relationship with Mr. Depp, including without limitation any Communications that refer or relate to the Action, the Divorce Action, the U.K. Action, any claims of abuse or violence involving Mr. Depp, and any injuries You contend You suffered as a result of any conduct by Mr. Depp.

RESPONSE:

35. All Documents that evidence or reflect any treatment You have received from Joseph Sugerman in connection with Your relationship with Mr. Depp.

RESPONSE:

36. All Communications between You and David Kipper that refer or relate to Your relationship with Mr. Depp, including without limitation any Communications that refer or relate

to the Action, the Divorce Action, the U.K. Action, any claims of abuse or violence involving Mr. Depp, and any injuries You contend You suffered as a result of any conduct by Mr. Depp.

RESPONSE:

37. All Documents that evidence or reflect any treatment You have received from David Kipper in connection with Your relationship with Mr. Depp.

RESPONSE:

38. All Communications between You and Lisa Beane that refer or relate to Your relationship with Mr. Depp, including without limitation any Communications that refer or relate to the Action, the Divorce Action, the U.K. Action, any claims of abuse or violence involving Mr. Depp, and any injuries You contend You suffered as a result of any conduct by Mr. Depp.

RESPONSE:

39. All Communications between You and Leonard Damian that refer or relate to Your relationship with Mr. Depp, including without limitation any Communications that refer or relate to the Action, the Divorce Action, the U.K. Action, any claims of abuse or violence involving Mr. Depp, and any injuries You contend You suffered as a result of any conduct by Mr. Depp.

RESPONSE:

40. All Communications between You and Melanie Inglessis that refer or relate to Your relationship with Mr. Depp, including without limitation any Communications that refer or relate to the Action, the Divorce Action, the U.K. Action, any claims of abuse or violence involving Mr. Depp, and any injuries You contend You suffered as a result of any conduct by Mr. Depp.

RESPONSE:

41. All Communications between You and Rami Sarabi that refer or relate to Your relationship with Mr. Depp, including without limitation any Communications that refer or relate to the Action, the Divorce Action, the U.K. Action, any claims of abuse or violence involving Mr. Depp, and any injuries You contend You suffered as a result of any conduct by Mr. Depp.

RESPONSE:

42. All Communications between You and Bianca Butti that refer or relate to Your relationship with Mr. Depp, including without limitation any Communications that refer or relate to the Action, the Divorce Action, the U.K. Action, any claims of abuse or violence involving Mr. Depp, and any injuries You contend You suffered as a result of any conduct by Mr. Depp.

RESPONSE:

43. All Communications between You and any other Person that refer or relate to Your relationship with Mr. Depp, including without limitation any Communications that refer or relate to the Action, the Divorce Action, the U.K. Action, any claims of abuse or violence involving Mr. Depp, and any injuries You contend You suffered as a result of any conduct by Mr. Depp.

RESPONSE:

44. All Documents that evidence or reflect any donations made by You of any settlement payments made to You by Mr. Depp in connection with the Divorce Action.

RESPONSE:

45. Documents sufficient to identify any and all entities to which You made any donations from any settlement payments made to You by Mr. Depp in connection with the Divorce Action, and the amount(s) of any such donation(s).

RESPONSE:

46. All Documents that evidence or reflect what You did with all funds You received in connection with any settlement payments made to You by Mr. Depp in connection with the Divorce Action.

RESPONSE:

47. All Documents that contain, constitute, refer, reflect, or relate to any and all Communications between You and any other Person regarding any donations made by You from any settlement payments made to You by Mr. Depp.

RESPONSE:

48. All Documents that contain, constitute, refer, reflect, or relate to any and all Communications between You and any other Person regarding the Divorce Action or the settlement thereof.

RESPONSE:

49. All Documents that contain, constitute, refer, reflect, or relate to any and all Communications between You, or anyone acting on Your behalf, on the one hand, and any other Person, on the other hand, regarding the UK Action.

RESPONSE:

50. All Documents that contain, constitute, refer, reflect, or relate to any and all Communications between You, or anyone acting on Your behalf, on the one hand, and NGN, or any person acting on NGN's behalf, on the other hand, regarding the UK Action, Mr. Depp, the relationship between You and Mr. Depp, the Divorce Action, and/or the subject matter of this action.

RESPONSE:

51. All Documents, including all Communications, that refer, reflect, or relate to the UK Action.

RESPONSE:

52. All Documents, including all Communications, that refer, reflect, or relate to Your relationship with Mr. Depp.

RESPONSE:

53. All Communications between You or anyone acting on Your behalf, on the one hand, and any member of the news media, on the other hand, that refer, reflect, or relate to Your relationship with Mr. Depp, this Action, Divorce Action, the U.K. Action, or the subject matter of any of the same.

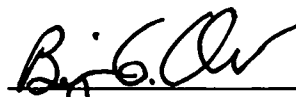
RESPONSE:

54. All Documents, including all drafts, that refer, reflect, or relate to any Communications between You or anyone acting on Your behalf, on the one hand, and any member of the news media, on the other hand, regarding Your relationship with Mr. Depp, this Action, Divorce Action, the U.K. Action, or the subject matter of any of the same.

RESPONSE:

Dated: August ¹⁴, 2020

Respectfully submitted,



Benjamin G. Chew (VSB #29113)
Camille M. Vasquez (*pro hac vice*)
Andrew C. Crawford (VSB #89093)
BROWN RUDNICK, LLP
601 Thirteenth Street NW, Suite 600
Washington, DC 20005

Phone: (202) 536-1785
Fax: (617) 289-0717
bchew@brownrudnick.com

- and -

Adam R. Waldman (*pro hac vice*)
THE ENDEAVOR GROUP LAW FIRM, P.C.
1775 Pennsylvania Avenue NW, Suite 350
Washington, DC 20006

Counsel for Plaintiff John C. Depp, II

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this 14th day of August 2020, I caused copies of the foregoing to be served via email (per written agreement between the Parties) on the following:

J. Benjamin Rottenborn (VSB No. 84796)
Joshua R. Treece (VSB No. 79149)
WOODS ROGERS PLC
10 S. Jefferson Street, Suite 1400
P.O. Box 14125
Roanoke, Virginia 24011
Telephone: (540) 983-7540
brottenborn@woodsrogers.com
jtreece@woodsrogers.com

Elaine Charlson Bredehoft (VSB No. 23766)
Carla D. Brown (VSB No. 44803)
Adam S. Nadelhaft (VSB No. 91717)
David E. Murphy (VSB No. 90938)
CHARLSON BREDEHOFT COHEN & BROWN, P.C.
11260 Roger Bacon Dr., Suite 201
Reston, VA 20190
Phone: 703-318-6800
Fax: 703-318-6808
ebredehoft@cbcblaw.com
cbrown@cbcblaw.com
anahelhaft@cbcblaw.com
dmurphy@cbcblaw.com

Counsel for Defendant Amber Laura Heard



Benjamin G. Chew