

EXHIBIT 6

VIRGINIA:

IN THE CIRCUIT COURT OF FAIRFAX COUNTY

JOHN C. DEPP, II

Plaintiff,

v.

AMBER LAURA HEARD

Defendant.

Civil Action No.: CL-2019-0002911

**DEFENDANT AMBER LAURA HEARD'S RESPONSES AND OBJECTIONS TO
PLAINTIFF'S THIRD SET OF REQUESTS FOR PRODUCTION**

Pursuant to Rule 4:9 of the Rules of the Supreme Court of Virginia ("Rules"), Defendant Amber Laura Heard, by and through her attorneys, submits these responses and objections (the "Responses") to Plaintiff John C. Depp's Third Set of Requests for Production dated August 14, 2020 (the "Requests").

GENERAL OBJECTIONS

The following general objections and responses (the "General Objections") are incorporated into each specific objection and response (the "Specific Objections") as if fully set forth therein:

1. Defendant objects to the Requests to the extent they are duplicative, cumulative, or seek information that has been or will be provided through other means of discovery.
2. Defendant objects to the Requests to the extent they are vague, ambiguous, overly broad, unduly burdensome, seek information not relevant to the claims or defenses of any party, or are not proportional to the needs of the case.
3. Defendant objects to the Requests to the extent they impose any obligations or requirements beyond the scope of the Rules or any case law interpreting them.

4. Defendant's Responses are not intended to be and shall not be construed as an agreement or concurrence that all information provided is admissible with respect to Plaintiff's claims.

5. Defendant objects to each Request to the extent that it calls for information that: (a) may be derived or ascertained from documents that have been or will be produced in this action; (b) is already in Plaintiff's possession, custody, or control; (c) is publicly available; or (d) is otherwise independently available to Plaintiff or his counsel.

6. Defendant objects to the Requests to the extent they purport to call for documents or information that: (a) are subject to the attorney-client privilege; (b) constitute attorney work product; (c) are protected from disclosure based on common interest or a similar privilege; or (d) are otherwise protected from disclosure under applicable privilege, law, or rule. Defendant will not produce such information in response to the Requests, and any inadvertent production thereof shall not be deemed a waiver of any privilege with respect to such information.

7. Defendant objects to the Requests to the extent they require unreasonable measures to locate and produce responsive information or documents. Defendant will construe the requests to require a reasonable and diligent search of its reasonably-accessible files where it would reasonably expect to find information, documents, or things related to the requests.

8. Defendant objects to the Requests to the extent they seek information that is not within Defendant's possession, custody, or control. Subject to this General Objection, in responding to the Requests, Defendant will provide only responsive information within Defendant's possession, custody, or control.

9. Defendant objects to the Definitions and Instructions to the extent they seek to impose obligations greater than those imposed by the Rules or any other applicable law, rule, ruling of this court or agreement of the parties.

10. Defendant objects to the Requests to the extent they are based on a false premise and contain express or implied assumptions of fact or law with respect to matters at issue in this case. Defendant's Responses to the Requests are not intended to be and shall not be construed as an agreement or concurrence with Plaintiff's characterization of any facts, circumstances, or legal obligations. Defendant reserves the right to contest any such characterization as inaccurate.

11. Defendant expressly reserves all rights and privileges under the Rules and any other applicable law or rule. The failure to assert such rights and privileges or the inadvertent disclosure by Defendant of information or documents protected by such rights or privileges shall not constitute a waiver thereof, either with respect to these Responses or with respect to any future discovery objections or responses.

12. Defendant's Responses to the Requests are made to the best of her present knowledge, information, and belief. These Responses are at all times subject to such additional or different information that discovery or further investigation may disclose and, while based on the present state of Defendant's knowledge and investigation, are subject to such additional knowledge of facts as may result from Defendant's further discovery or investigation.

SPECIFIC OBJECTIONS AND RESPONSES

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:

Subject to the foregoing general objections, Defendant has produced in this action and/or in the U.K. litigation (which Plaintiff already possesses from the trial bundles) non-privileged responsive documents and will produce any additional, non-privileged documents that are identified by a reasonable search for such information that Defendant believes are responsive to this request.

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

RESPONSE:

Defendant objects to this request to the extent it is overbroad and unduly burdensome. Defendant objects to this request to the extent it seeks information that is in the possession, custody or control of Plaintiff or third parties. Defendant further objects to this request to the extent it seeks information that is available to and equally accessible to Plaintiff. Subject to the foregoing specific and general objections, Defendant has produced in this action and/or the U.K. litigation (which Plaintiff already possesses from the trial bundles) non-privileged responsive documents and will produce any additional, non-privileged documents that are identified by a reasonable search for such information that Defendant believes are responsive to this request.

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:

Defendant objects to this request to the extent it is overbroad and unduly burdensome. Defendant objects to this request to the extent it seeks information that is in the possession, custody or control of Plaintiff or third parties. Defendant further objects to this request to the extent it seeks information that is available to and equally accessible to Plaintiff. Subject to the foregoing specific and general objections, Defendant has produced in this action and/or the U.K. litigation (which Plaintiff already possesses from the trial bundles) non-privileged responsive documents and will produce any additional, non-privileged documents that are identified by a reasonable search for such information that Defendant believes are responsive to this request.

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:

Defendant objects to this request to the extent it is overbroad and unduly burdensome. Defendant objects to this request to the extent it seeks information that is in the possession, custody or control of Plaintiff or third parties. Defendant further objects to this request to the extent it seeks information that is available to and equally accessible to Plaintiff. Subject to the foregoing specific and general objections, Defendant has produced in this action and/or the U.K. litigation (which Plaintiff already possesses from the trial bundles) non-privileged responsive documents and will produce any additional, non-privileged documents that are identified by a reasonable search for such information that Defendant believes are responsive to this request.

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

RESPONSE:

Defendant objects to this request on the grounds that it is overbroad, unduly burdensome, and not relevant or likely to lead to the discovery of admissible evidence. Defendant objects to this request to the extent it seeks privileged information protected from disclosure, including information protected by the attorney-client privilege or work product doctrine and any other applicable privilege, immunity or protection. Subject to the foregoing specific and general objections, Defendant has produced in this action and/or the U.K. litigation (which Plaintiff already possesses from the trial bundles) non-privileged responsive documents and will produce any additional, non-privileged documents that are identified by a reasonable search that refer or relate to the claims or defenses in this case.

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

RESPONSE:

Defendant objects to this request on the grounds that it is overbroad, unduly burdensome and seeks information that is not relevant to the claims or defenses in this action and not relevant or reasonably calculated to lead to the discovery of admissible evidence. Defendant further objects to this request to the extent it seeks information that is already available to and equally accessible to Plaintiff. Defendant objects to this request to the extent it seeks privileged information protected from disclosure, including information protected by the attorney-client privilege or work product doctrine and any other applicable privilege, immunity or protection. Subject to the foregoing specific and general objections, Defendant has produced in this action and/or the U.K. litigation (which Plaintiff already possesses from the trial bundles) non-privileged responsive documents and will produce any additional, non-privileged documents that are identified by a reasonable search that refer or relate to the claims and defenses in this case.

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:

Defendant objects to this request on the grounds that it is overbroad and unduly burdensome and seeks information that is not relevant to the claims or defenses in this action and not reasonably calculated to lead to the discovery of admissible evidence. Defendant further objects to this request to the extent it seeks information that is already available to and equally accessible to Plaintiff. Defendant objects to this request to the extent it seeks privileged information protected from disclosure, including information protected by the attorney-client privilege or work product doctrine and any other applicable privilege, immunity or protection. Subject to the foregoing specific and general objections, Defendant has produced in this action and/or the U.K. litigation (which Plaintiff already possesses from the trial bundles) non-privileged responsive documents and will produce any additional, non-privileged documents that are identified by a reasonable search that refer or relate to the claims and defenses in this case.

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:

Defendant objects to this request on the grounds that it is overbroad and unduly burdensome and seeks information that is not relevant to the claims or defenses in this action and not reasonably calculated to lead to the discovery of admissible evidence. Defendant further objects to this request to the extent it seeks information that is already available to and equally accessible to Plaintiff. Defendant objects to this request to the extent it seeks privileged

information protected from disclosure, including information protected by the attorney-client privilege or work product doctrine and any other applicable privilege, immunity or protection. Subject to the foregoing specific and general objections, Defendant has produced in this action and/or the U.K. litigation (which Plaintiff already possesses from the trial bundles) non-privileged responsive documents and will produce any additional, non-privileged documents that are identified by a reasonable search that refer or relate to the claims and defenses in this case.

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:

Defendant objects to this request on the grounds that it is overbroad and unduly burdensome and seeks information that is not relevant to the claims or defenses in this action and not reasonably calculated to lead to the discovery of admissible evidence. Defendant further objects to this request to the extent it seeks information that is already available to and equally accessible to Plaintiff. Defendant objects to this request to the extent it seeks privileged information protected from disclosure, including information protected by the attorney-client privilege or work product doctrine and any other applicable privilege, immunity or protection. Subject to the foregoing specific and general objections, Defendant has produced in this action and/or the U.K. litigation (which Plaintiff already possesses from the trial bundles) non-privileged responsive documents and will produce any additional, non-privileged documents that are identified by a reasonable search that refer or relate to the claims and defenses in this case.

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:

Defendant objects to this request on the grounds that it is overbroad and unduly burdensome and seeks information that is not relevant to the claims or defenses in this action and not reasonably calculated to lead to the discovery of admissible evidence. Defendant further objects to this request to the extent it seeks information that is already available to and equally accessible to Plaintiff. Defendant objects to this request to the extent it seeks privileged information protected from disclosure, including information protected by the attorney-client privilege or work product doctrine and any other applicable privilege, immunity or protection. Subject to the foregoing specific and general objections, Defendant has produced in this action and/or the U.K. litigation (which Plaintiff already possesses from the trial bundles) non-privileged responsive documents and will produce any additional, non-privileged documents that are identified by a reasonable search that refer or relate to the claims and defenses in this case.

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:

Defendant objects to this request on the grounds that it is overbroad and unduly burdensome and seeks information that is not relevant to the claims or defenses in this action and not reasonably calculated to lead to the discovery of admissible evidence. Defendant further objects to this request to the extent it seeks information that is already available to and equally

accessible to Plaintiff. Defendant objects to this request to the extent it seeks privileged information protected from disclosure, including information protected by the attorney-client privilege or work product doctrine and any other applicable privilege, immunity or protection. Subject to the foregoing specific and general objections, Defendant has produced in this action and/or the U.K. litigation (which Plaintiff already possesses from the trial bundles) non-privileged responsive documents and will produce any additional, non-privileged documents that are identified by a reasonable search that refer or relate to the claims and defenses in this case.

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:

Defendant objects to this request on the grounds that it is overbroad and unduly burdensome and seeks information that is not relevant to the claims or defenses in this action and not reasonably calculated to lead to the discovery of admissible evidence. Defendant further objects to this request to the extent it seeks information that is already available to and equally accessible to Plaintiff. Defendant objects to this request to the extent it seeks privileged information protected from disclosure, including information protected by the attorney-client privilege or work product doctrine and any other applicable privilege, immunity or protection. Subject to the foregoing specific and general objections, Defendant has produced in this action and/or the U.K. litigation (which Plaintiff already possesses from the trial bundles) non-privileged responsive documents and will produce any additional, non-privileged documents that are identified by a reasonable search that refer or relate to the claims and defenses in this case.

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:

Defendant objects to this request on the grounds that it is overbroad and unduly burdensome and seeks information that is not relevant to the claims or defenses in this action and not reasonably calculated to lead to the discovery of admissible evidence. Defendant further objects to this request to the extent it seeks information that is already available to and equally accessible to Plaintiff. Defendant objects to this request to the extent it seeks privileged information protected from disclosure, including information protected by the attorney-client privilege or work product doctrine and any other applicable privilege, immunity or protection. Subject to the foregoing specific and general objections, Defendant has produced in this action and/or the U.K. litigation (which Plaintiff already possesses from the trial bundles) non-privileged responsive documents and will produce any additional, non-privileged documents that are identified by a reasonable search that refer or relate to the claims and defenses in this case.

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:

Defendant objects to this request on the grounds that it is overbroad and unduly burdensome and seeks information that is not relevant to the claims or defenses in this action and not reasonably calculated to lead to the discovery of admissible evidence. Defendant further objects to this request to the extent it seeks information that is already available to and equally

accessible to Plaintiff. Defendant objects to this request to the extent it seeks privileged information protected from disclosure, including information protected by the attorney-client privilege or work product doctrine and any other applicable privilege, immunity or protection. Subject to the foregoing specific and general objections, Defendant has produced in this action and/or the U.K. litigation (which Plaintiff already possesses from the trial bundles) non-privileged responsive documents and will produce any additional, non-privileged documents that are identified by a reasonable search that refer or relate to the claims and defenses in this case.

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:

Defendant objects to this request on the grounds that it is overbroad and unduly burdensome and seeks information that is not relevant to the claims or defenses in this action and not reasonably calculated to lead to the discovery of admissible evidence. Defendant further objects to this request to the extent it seeks information that is already available to and equally accessible to Plaintiff. Defendant objects to this request to the extent it seeks privileged information protected from disclosure, including information protected by the attorney-client privilege or work product doctrine and any other applicable privilege, immunity or protection. Subject to the foregoing specific and general objections, Defendant will produce non-privileged documents that are identified by a reasonable search that refer or relate to the claims and defenses in this case.

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:

Defendant objects to this request on the grounds that it is overbroad and unduly burdensome and seeks information that is not relevant to the claims or defenses in this action and not reasonably calculated to lead to the discovery of admissible evidence. Defendant objects to this request to the extent it seeks confidential medical records and information that are not relevant to this action and/or unreasonably invades upon Defendant's medical privacy rights. The Court has already ruled on this issue. Subject to the foregoing specific and general objections, Defendant has produced in this action and/or the U.K. litigation (which Plaintiff already possesses from the trial bundles) all responsive documents in her possession, custody or control, subject to the ruling of the Court.

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

RESPONSE:

Defendant objects to this request on the grounds that it is overbroad and unduly burdensome and seeks information that is not relevant to the claims or defenses in this action and not reasonably calculated to lead to the discovery of admissible evidence. Defendant objects to this request on the grounds that it seeks confidential medical records and information that are not relevant to this action and unreasonably invades upon Defendant's medical privacy rights. Defendant further objects to this request to the extent it is duplicative of Request 16. The Court has already ruled on this issue. Subject to the foregoing specific and general objections, Defendant

has produced in this action and/or the U.K. litigation (which Plaintiff already possesses from the trial bundles) all responsive documents in her possession, custody or control, subject to the ruling of the Court.

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:

Defendant objects to this request on the grounds that it is overbroad and unduly burdensome and seeks Information that is not relevant to the claims or defenses in this action and not reasonably calculated to lead to the discovery of admissible evidence. Defendant objects to this request to the extent it seeks confidential medical records and information that are not relevant to this action and/or unreasonably invades upon Defendant's medical privacy rights. Defendant objects to this request to the extent it is duplicative of Requests 16-17. The Court has already ruled on this issue. Subject to the foregoing specific and general objections, Defendant has produced in this action and/or the U.K. litigation (which Plaintiff already possesses from the trial bundles) all responsive documents in her possession, custody or control, subject to the ruling of the Court.

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:

Defendant objects to this request on the grounds that it is overbroad and unduly burdensome and seeks information that is not relevant to the claims or defenses in this action and not reasonably calculated to lead to the discovery of admissible evidence. Defendant further

objects to this request to the extent it seeks information that is already available to and equally accessible to Plaintiff. Defendant objects to this request to the extent it seeks privileged information protected from disclosure, including information protected by the attorney-client privilege or work product doctrine and any other applicable privilege, immunity or protection. Subject to the foregoing specific and general objections, Defendant has produced in this action and/or the U.K. litigation (which Plaintiff already possesses from the trial bundles) all non-privileged documents that are identified by a reasonable search that refer or relate to the claims and defenses in this case.

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:

Defendant objects to this request on the grounds that it is overbroad and unduly burdensome and seeks information that is not relevant to the claims or defenses in this action and not reasonably calculated to lead to the discovery of admissible evidence. Defendant further objects to this request to the extent it seeks information that is already available to and equally accessible to Plaintiff. Defendant objects to this request to the extent it seeks privileged information protected from disclosure, including information protected by the attorney-client privilege or work product doctrine and any other applicable privilege, immunity or protection. Subject to the foregoing specific and general objections, Defendant has produced in this action and/or the U.K. litigation (which Plaintiff already possesses from the trial bundles) all non-privileged documents that are identified by a reasonable search that refer or relate to the claims and defenses in this case.

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:

Defendant objects to this request on the grounds that it is overbroad and unduly burdensome and seeks information that is not relevant to the claims or defenses in this action and not reasonably calculated to lead to the discovery of admissible evidence. Defendant objects to this request to the extent it seeks confidential medical records and information that are not relevant to this action and/or unreasonably invades upon Defendant's medical privacy rights. Subject to the foregoing specific and general objections, Defendant has produced in this action and/or the U.K. litigation (which Plaintiff already possesses from the trial bundles) all non-privileged documents that are identified by a reasonable search that refer or relate to the claims and defenses in this case.

22. All Communications between You and Tasya van Ree 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:

Defendant objects to this request on the grounds that it is overbroad and unduly burdensome and seeks information that is not relevant to the claims or defenses in this action and not reasonably calculated to lead to the discovery of admissible evidence. Defendant further objects to this request to the extent it seeks information that is already available to and equally accessible to Plaintiff. Defendant objects to this request to the extent it seeks privileged information protected from disclosure, including information protected by the attorney-client

privilege or work product doctrine and any other applicable privilege, immunity or protection. Subject to the foregoing specific and general objections, Defendant has produced in this action and/or the U.K. litigation (which Plaintiff already possesses from the trial bundles) all non-privileged documents that are identified by a reasonable search that refer or relate to the claims and defenses in this case.

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:

Defendant objects to this request on the grounds that it is overbroad and unduly burdensome and seeks information that is not relevant to the claims or defenses in this action and not reasonably calculated to lead to the discovery of admissible evidence. Defendant further objects to this request to the extent it seeks information that is already available to and equally accessible to Plaintiff. Defendant objects to this request to the extent it seeks privileged information protected from disclosure, including information protected by the attorney-client privilege or work product doctrine and any other applicable privilege, immunity or protection. Subject to the foregoing specific and general objections, Defendant has produced in this action and/or the U.K. litigation (which Plaintiff already possesses from the trial bundles) all non-privileged documents that are identified by a reasonable search that refer or relate to the claims and defenses in this case.

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:

Defendant objects to this request on the grounds that it is overbroad and unduly burdensome and seeks information that is not relevant to the claims or defenses in this action and not reasonably calculated to lead to the discovery of admissible evidence. Defendant further objects to this request to the extent it seeks information that is already available to and equally accessible to Plaintiff. Defendant objects to this request to the extent it seeks privileged information protected from disclosure, including information protected by the attorney-client privilege or work product doctrine and any other applicable privilege, immunity or protection. Subject to the foregoing specific and general objections, Defendant has produced in this action and/or the U.K. litigation (which Plaintiff already possesses from the trial bundles) all non-privileged documents and will produce any further that are identified by a reasonable search that refer or relate to the claims and defenses in this case.

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:

Defendant objects to this request on the grounds that it is overbroad and unduly burdensome and seeks information that is not relevant to the claims or defenses in this action and not reasonably calculated to lead to the discovery of admissible evidence. Defendant further objects to this request to the extent it seeks information that is already available to and equally

accessible to Plaintiff. The Court has already ruled on this issue. Subject to the foregoing specific and general objections, Defendant has produced in this action and/or the U.K. litigation (which Plaintiff already possesses from the trial bundles) all non-privileged documents that are identified by a reasonable search that refer or relate to the claims and defenses in this case.

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:

Defendant objects to this request on the grounds that it is overbroad and unduly burdensome and seeks information that is not relevant to the claims or defenses in this action and not reasonably calculated to lead to the discovery of admissible evidence. Defendant further objects to this request to the extent it seeks information that is already available to and equally accessible to Plaintiff. Defendant objects to this request to the extent it seeks privileged information protected from disclosure, including information protected by the attorney-client privilege or work product doctrine and any other applicable privilege, immunity or protection. The Court has already ruled on this issue. Subject to the foregoing specific and general objections, Defendant has produced in this action and/or the U.K. litigation (which Plaintiff already possesses from the trial bundles) all non-privileged documents that are identified by a reasonable search that refer or relate to the claims and defenses in this case.

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:

Defendant objects to this request on the grounds that it is overbroad and unduly burdensome and seeks information that is not relevant to the claims or defenses in this action and not reasonably calculated to lead to the discovery of admissible evidence. Defendant further objects to this request to the extent it seeks information that is already available to and equally accessible to Plaintiff. Defendant objects to this request to the extent it seeks privileged information protected from disclosure, including information protected by the attorney-client privilege or work product doctrine and any other applicable privilege, immunity or protection. The Court has already ruled on this issue. Subject to the foregoing specific and general objections, Defendant has produced in this action and/or the U.K. litigation (which Plaintiff already possesses from the trial bundles) all non-privileged documents that are identified by a reasonable search that refer or relate to the claims and defenses in this case.

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:

Defendant objects to this request on the grounds that it is overbroad and unduly burdensome and seeks Information that is not relevant to the claims or defenses in this action and not reasonably calculated to lead to the discovery of admissible evidence. Defendant objects to this request to the extent it seeks confidential medical records and information that are not relevant to this action and/or unreasonably invades upon Defendant's medical privacy rights. The Court has already ruled on this issue. Subject to the foregoing specific and general objections, Defendant has produced in this action and/or the U.K. litigation (which Plaintiff already possesses from the

trial bundles) all responsive documents in her possession, custody or control, subject to the ruling of the Court.

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

RESPONSE:

Defendant objects to this request on the grounds that it is overbroad and unduly burdensome and seeks Information that is not relevant to the claims or defenses in this action and not reasonably calculated to lead to the discovery of admissible evidence. Defendant objects to this request to the extent it seeks confidential medical records and information that are not relevant to this action and/or unreasonably invades upon Defendant's medical privacy rights. Defendant objects to this request to the extent it is duplicative of Requests 28. The Court has already ruled on this issue. Subject to the foregoing specific and general objections, Defendant has produced in this action and/or the U.K. litigation (which Plaintiff already possesses from the trial bundles) all responsive documents in her possession, custody or control, subject to the ruling of the Court.

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:

Defendant objects to this request on the grounds that it is overbroad and unduly burdensome and seeks Information that is not relevant to the claims or defenses in this action and not reasonably calculated to lead to the discovery of admissible evidence. Defendant objects to this request to the extent it seeks confidential medical records and information that are not relevant to this action and/or unreasonably invades upon Defendant's medical privacy rights. The Court has already ruled on this issue. Subject to the foregoing specific and general objections, Defendant

has produced in this action and/or the U.K. litigation (which Plaintiff already possesses from the trial bundles) all responsive documents in her possession, custody or control, subject to the ruling of the Court.

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

RESPONSE:

Defendant objects to this request on the grounds that it is overbroad and unduly burdensome and seeks Information that is not relevant to the claims or defenses in this action and not reasonably calculated to lead to the discovery of admissible evidence. Defendant objects to this request to the extent it seeks confidential medical records and information that are not relevant to this action and/or unreasonably invades upon Defendant's medical privacy rights. Defendant objects to this request to the extent it is duplicative of Requests 30. The Court has already ruled on this issue. Subject to the foregoing specific and general objections, Defendant has produced in this action and/or the U.K. litigation (which Plaintiff already possesses from the trial bundles) all responsive documents in her possession, custody or control, subject to the ruling of the Court.

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:

Defendant objects to this request on the grounds that it is overbroad and unduly burdensome and seeks Information that is not relevant to the claims or defenses in this action and not reasonably calculated to lead to the discovery of admissible evidence. Defendant objects to this request to the extent it seeks confidential medical records and information that are not relevant to this action and/or unreasonably invades upon Defendant's medical privacy rights. The Court

has already ruled on this issue. Subject to the foregoing specific and general objections, Defendant has produced in this action and/or the U.K. litigation (which Plaintiff already possesses from the trial bundles) all responsive documents in her possession, custody or control, subject to the ruling of the Court.

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

RESPONSE:

Defendant objects to this request on the grounds that it is overbroad and unduly burdensome and seeks Information that is not relevant to the claims or defenses in this action and not reasonably calculated to lead to the discovery of admissible evidence. Defendant objects to this request to the extent it seeks confidential medical records and information that are not relevant to this action and/or unreasonably invades upon Defendant's medical privacy rights. Defendant objects to this request to the extent it is duplicative of Requests 32. The Court has already ruled on this issue. Subject to the foregoing specific and general objections, Defendant has produced in this action and/or the U.K. litigation (which Plaintiff already possesses from the trial bundles) all responsive documents in her possession, custody or control, subject to the ruling of the Court.

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:

Defendant objects to this request on the grounds that it is overbroad and unduly burdensome and seeks Information that is not relevant to the claims or defenses in this action and not reasonably calculated to lead to the discovery of admissible evidence. Defendant objects to this request to the extent it seeks confidential medical records and information that are not relevant

to this action and/or unreasonably invades upon Defendant's medical privacy rights. The Court has already ruled on this issue. Subject to the foregoing specific and general objections, Defendant has produced in this action and/or the U.K. litigation (which Plaintiff already possesses from the trial bundles) all responsive documents in her possession, custody or control, subject to the ruling of the Court.

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

RESPONSE:

Defendant objects to this request on the grounds that it is overbroad and unduly burdensome and seeks Information that is not relevant to the claims or defenses in this action and not reasonably calculated to lead to the discovery of admissible evidence. Defendant objects to this request to the extent it seeks confidential medical records and information that are not relevant to this action and/or unreasonably invades upon Defendant's medical privacy rights. Defendant objects to this request to the extent it is duplicative of Requests 34. The Court has already ruled on this issue. Subject to the foregoing specific and general objections, Defendant has produced in this action and/or the U.K. litigation (which Plaintiff already possesses from the trial bundles) all responsive documents in her possession, custody or control, subject to the ruling of the Court.

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:

Defendant objects to this request on the grounds that it is overbroad and unduly burdensome and seeks Information that is not relevant to the claims or defenses in this action and not reasonably calculated to lead to the discovery of admissible evidence. Defendant objects to

this request to the extent it seeks confidential medical records and information that are not relevant to this action and/or unreasonably invades upon Defendant's medical privacy rights. The Court has already ruled on this issue. Subject to the foregoing specific and general objections, Defendant has produced in this action and/or the U.K. litigation (which Plaintiff already possesses from the trial bundles) all responsive documents in her possession, custody or control, subject to the ruling of the Court.

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

RESPONSE:

Defendant objects to this request on the grounds that it is overbroad and unduly burdensome and seeks Information that is not relevant to the claims or defenses in this action and not reasonably calculated to lead to the discovery of admissible evidence. Defendant objects to this request to the extent it seeks confidential medical records and information that are not relevant to this action and/or unreasonably invades upon Defendant's medical privacy rights. Defendant objects to this request to the extent it is duplicative of Requests 36. The Court has already ruled on this issue. Subject to the foregoing specific and general objections, Defendant has produced in this action and/or the U.K. litigation (which Plaintiff already possesses from the trial bundles) all responsive documents in her possession, custody or control, subject to the ruling of the Court.

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:

Defendant objects to this request on the grounds that it is overbroad and unduly burdensome and seeks Information that is not relevant to the claims or defenses in this action and

not reasonably calculated to lead to the discovery of admissible evidence. Defendant objects to this request to the extent it seeks confidential medical records and information that are not relevant to this action and/or unreasonably invades upon Defendant's medical privacy rights. Subject to the foregoing specific and general objections, Defendant has produced in this action and/or the U.K. litigation (which Plaintiff already possesses from the trial bundles) non-privileged responsive documents and will produce any additional, non-privileged documents that are identified by a reasonable search that refer or relate to the claims and defenses in this case.

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:

Defendant objects to this request on the grounds that it is overbroad and unduly burdensome and seeks Information that is not relevant to the claims or defenses in this action and not reasonably calculated to lead to the discovery of admissible evidence. Defendant further objects to this request to the extent it seeks information that is already available to and equally accessible to Plaintiff. Defendant objects to this request to the extent it seeks privileged information protected from disclosure, including information protected by the attorney-client privilege or work product doctrine and any other applicable privilege, immunity or protection. Subject to the foregoing specific and general objections, Defendant has produced in this action and/or the U.K. litigation (which Plaintiff already possesses from the trial bundles) non-privileged responsive documents and will produce any additional, non-privileged documents that are identified by a reasonable search that refer or relate to the claims and defenses in this case.

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:

Defendant objects to this request on the grounds that it is overbroad and unduly burdensome and seeks Information that is not relevant to the claims or defenses in this action and not reasonably calculated to lead to the discovery of admissible evidence. Defendant further objects to this request to the extent it seeks information that is already available to and equally accessible to Plaintiff. Defendant objects to this request to the extent it seeks privileged information protected from disclosure, including information protected by the attorney-client privilege or work product doctrine and any other applicable privilege, immunity or protection. Subject to the foregoing specific and general objections, Defendant has produced in this action and/or the U.K. litigation (which Plaintiff already possesses from the trial bundles) non-privileged responsive documents and will produce any additional, non-privileged documents that are identified by a reasonable search that refer or relate to the claims and defenses in this case.

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:

Defendant objects to this request on the grounds that it is overbroad and unduly burdensome and seeks Information that is not relevant to the claims or defenses in this action and not reasonably calculated to lead to the discovery of admissible evidence. Defendant further objects to this request to the extent it seeks information that is already available to and equally accessible to Plaintiff. Defendant objects to this request to the extent it seeks privileged information protected from disclosure, including information protected by the attorney-client privilege or work product doctrine and any other applicable privilege, immunity or protection. Subject to the foregoing specific and general objections, Defendant has produced in this action and/or the U.K. litigation (which Plaintiff already possesses from the trial bundles) non-privileged responsive documents and will produce any additional, non-privileged documents that are identified by a reasonable search that refer or relate to the claims and defenses in this case.

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:

Defendant objects to this request on the grounds that it is overbroad and unduly burdensome because it seeks information that is not relevant to the claims or defenses in this action and not reasonably calculated to lead to the discovery of admissible evidence. Defendant objects to this request to the extent it seeks privileged information protected from disclosure, including

information protected by the attorney-client privilege or work product doctrine and any other applicable privilege, immunity or protection.

Notwithstanding any non-privileged, responsive documents Defendant may have produced in this action and/or the U.K. litigation (which Plaintiff already possesses from the trial bundles), Defendant stands on the objections.

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:

Defendant objects to this request on the grounds that it is overbroad and unduly burdensome because it seeks information that is not relevant to the claims or defenses in this action and not reasonably calculated to lead to the discovery of admissible evidence. Defendant further objects to this request to the extent it seeks information that is already available to and equally accessible to Plaintiff. Defendant objects to this request to the extent it seeks privileged information protected from disclosure, including information protected by the attorney-client privilege or work product doctrine and any other applicable privilege, immunity or protection.

Notwithstanding any non-privileged, responsive documents Defendant may have produced in this action and/or the U.K. litigation (which Plaintiff already possesses from the trial bundles), Defendant stands on the objections.

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:

Defendant objects to this request on the grounds that it seeks information that is irrelevant and not reasonably calculated to lead to the discovery of admissible evidence. The information sought herein simply has no bearing on the claims or defenses at issue and establishes a bad precedent for the confidentiality of donations.

Notwithstanding any non-privileged, responsive documents Defendant may have produced in this action and/or the U.K. litigation (which Plaintiff already possesses from the trial bundles), Defendant stands on the objections.

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:

Defendant objects to this request on the grounds that it seeks information that is irrelevant and not reasonably calculated to lead to the discovery of admissible evidence. The information sought herein simply has no bearing on the claims or defenses at issue.

Notwithstanding any non-privileged, responsive documents Defendant may have produced in this action and/or the U.K. litigation (which Plaintiff already possesses from the trial bundles), Defendant stands on the objections.

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:

Defendant objects to this request on the grounds that it seeks information that is irrelevant and not reasonably calculated to lead to the discovery of admissible evidence. The information sought herein simply has no bearing on the claims or defenses at issue.

Notwithstanding any non-privileged, responsive documents Defendant may have produced in this action and/or the U.K. litigation (which Plaintiff already possesses from the trial bundles), Defendant stands on the objections.

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:

Defendant objects to this request on the grounds that it seeks information that is irrelevant and not reasonably calculated to lead to the discovery of admissible evidence. The information sought herein simply has no bearing on the claims or defenses at issue.

Notwithstanding any non-privileged, responsive documents Defendant may have produced in this action and/or the U.K. litigation (which Plaintiff already possesses from the trial bundles), Defendant stands on the objections.

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:

Defendant objects to this request on the grounds that it is overbroad and unduly burdensome because it seeks information that is not relevant to the claims or defenses in this action and not reasonably calculated to lead to the discovery of admissible evidence. Defendant further objects to this request to the extent it seeks information that is already available to and equally accessible to Plaintiff. Defendant objects to this request to the extent it seeks privileged information protected from disclosure, including information protected by the attorney-client privilege or work product doctrine and any other applicable privilege, immunity or protection. Subject to the foregoing specific and general objections, Defendant has produced in this action

and/or the U.K. litigation (which Plaintiff already possesses from the trial bundles) responsive documents and will produce any additional, non-privileged documents that are identified by a reasonable search that refer or relate to the claims and defenses in this case.

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:

Defendant objects to this request on the grounds that it is overbroad and unduly burdensome because it seeks information that is not relevant to the claims or defenses in this action and not reasonably calculated to lead to the discovery of admissible evidence. Defendant further objects to this request to the extent it seeks information that is already available to and equally accessible to Plaintiff. Defendant objects to this request to the extent it seeks privileged information protected from disclosure, including information protected by the attorney-client privilege or work product doctrine and any other applicable privilege, immunity or protection. Subject to the foregoing specific and general objections, Defendant has produced in this action and/or the U.K. litigation (which Plaintiff already possesses from the trial bundles) responsive documents and will produce any additional, non-privileged documents that are identified by a reasonable search that refer or relate to the claims and defenses in this case.

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:

Defendant objects to this request on the grounds that it is overbroad and unduly burdensome, and because the information sought is neither relevant to any issue in this litigation, nor reasonably calculated to lead to the discovery of admissible evidence. Defendant also objects to this request on the grounds that it seeks information that is protected by the joint and/or common interest privilege.

Notwithstanding any non-privileged, responsive documents Defendant may have produced in this action and/or the U.K. litigation (which Plaintiff already possesses from the trial bundles), Defendant stands on the objections.

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

RESPONSE:

Defendant objects to this request on the grounds that it is overbroad and unduly burdensome, and because the information sought is neither relevant to any issue in this litigation, nor reasonably calculated to lead to the discovery of admissible evidence. Defendant further objects to this request to the extent it seeks information that is already available to and equally accessible to Plaintiff. Defendant objects to this request to the extent it seeks privileged information protected from disclosure, including information protected by the attorney-client privilege or work product doctrine and any other applicable privilege, immunity or protection.

Notwithstanding any non-privileged, responsive documents Defendant may have produced in this action and/or the U.K. litigation (which Plaintiff already possesses from the trial bundles), Defendant stands on the objections.

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

RESPONSE:

Defendant objects to this request on the grounds that it is overbroad and unduly burdensome and not reasonably calculated to lead to the discovery of admissible evidence. Defendant further objects to this request to the extent it seeks information that is already available to and equally accessible to Plaintiff. Defendant objects to this request to the extent it seeks privileged information protected from disclosure, including information protected by the attorney-client privilege or work product doctrine and any other applicable privilege, immunity or protection.

Notwithstanding any non-privileged, responsive documents Defendant may have produced in this action and/or the U.K. litigation (which Plaintiff already possesses from the trial bundles), Defendant stands on the objections.

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:

Defendant objects to this request on the grounds that it is overbroad and unduly burdensome and not reasonably calculated to lead to the discovery of admissible evidence. Defendant further objects to this request to the extent it seeks information that is already available to and equally accessible to Plaintiff. Defendant objects to this request to the extent it seeks privileged information protected from disclosure, including information protected by the attorney-client privilege or work product doctrine and any other applicable privilege, immunity or protection.

Notwithstanding any non-privileged, responsive documents Defendant may have produced in this action and/or the U.K. litigation (which Plaintiff already possesses from the trial bundles), Defendant stands on the objections.

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.

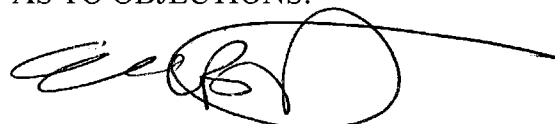
RESPONSE:

Defendant objects to this request on the grounds that it is overbroad and unduly burdensome and not reasonably calculated to lead to the discovery of admissible evidence. Defendant further objects to this request to the extent it seeks information that is already available to and equally accessible to Plaintiff. Defendant objects to this request to the extent it seeks privileged information protected from disclosure, including information protected by the attorney-client privilege or work product doctrine and any other applicable privilege, immunity or protection.

Notwithstanding any non-privileged, responsive documents Defendant may have produced in this action and/or the U.K. litigation (which Plaintiff already possesses from the trial bundles), Defendant stands on the objections.

September 4, 2020

AS TO OBJECTIONS:



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