

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

----- :
JOHN C. DEPP, II, :

Petitioner, :

v. :

AMERICAN CIVIL LIBERTIES UNION
FOUNDATION, BENJAMIN WIZNER, and
ANTHONY ROMERO, :

Respondents. :
----- :

Index No. 154545/2021
Part 37
Hon. Arthur F. Engoron
Motion Sequence No. 004

**NOTICE OF MOTION FOR
PRODUCTION EXPENSES
PURSUANT TO CPLR 3111 AND
3122(D)**

PLEASE TAKE NOTICE that, upon the Memorandum of Law in Support of Respondents’ Motion for Production Expenses, the Affirmation of Stephanie Teplin and exhibits attached thereto, and all other pleadings and proceedings in this case, Respondents American Civil Liberties Union Foundation, Benjamin Wizner, and Anthony Romero, by and through their counsel, Patterson Belknap Webb & Tyler LLP, will move this Court, located at the Motion Submission Part Courtroom, Room 130, 60 Centre Street, New York, New York 10007, on May 4, 2022 at 9:30 AM, or as soon thereafter as counsel can be heard, for reimbursement of production expenses totaling \$86,253.26, which Respondents incurred in complying with three non-party subpoenas *duces tecum* served by Petitioner John C. Depp, II.

PLEASE TAKE FURTHER NOTICE that pursuant to CPLR 2214(b), any answering affidavits, affirmations, and/or notices of cross motion with supporting papers in response to the motion shall be served and filed at least seven days before the return date of this motion (i.e., on or before April 27, 2022), and Respondents may serve any reply papers thereto on or before May 3, 2022.

Dated: New York, New York
April 18, 2022

/s/ Stephanie Teplin_____

Stephanie Teplin
Michael D. Schwartz
PATTERSON BELKNAP WEBB & TYLER LLP
1133 Avenue of the Americas
New York, New York 10036
(212) 336-2000
steplin@pbwt.com
mschwartz@pbwt.com

*Counsel for Respondents American Civil Liberties Union
Foundation, Benjamin Wizner, and Anthony Romero*