

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

In the Matter of:

JOHN C. DEPP, II,

Petitioner,

v.

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

Respondents,

For an Order to compel response to out-of-
state subpoenas served in the action entitled
John C. Depp, II v. Amber Laura Heard, No.
CL2019-0002911 in the Circuit Court of
Fairfax County in the Commonwealth of
Virginia.

Index No. _____

**NOTICE OF PETITION TO COMPEL
RESPONSE TO OUT-OF-STATE
SUBPOENAS**

Oral Argument Requested

PLEASE TAKE NOTICE that, upon the annexed Petition to Compel Response to Out-of-State Subpoenas, the Affirmation of Jessica N. Meyers, and the exhibits attached thereto, and the Memorandum of Law in Support of the Petition, all dated May 10, 2021, Petitioner John C. Depp, II (“Mr. Depp”), by his attorneys, Brown Rudnick LLP, moves before this Court in the Motion Support Courtroom - Submissions Part, Room 130, at the New York County Courthouse, located at 60 Centre Street, New York, New York, 10007, on June 9, 2021, or as soon thereafter as counsel may be heard, to grant Petitioner the following relief pursuant to CPLR § 3119: (i) an order compelling the American Civil Liberties Union Foundation, Benjamin Wizner, and Anthony Romero to comply with the out-of-state subpoenas (the “Subpoenas”); and (ii) grant Mr. Depp’s costs and attorneys’ fees and such other and further relief as the Court deems just and proper.

PLEASE TAKE FURTHER NOTICE that, pursuant to CPLR § 7804(c), demand is hereby made that service of an answer and supporting affidavits, if any, be made at least five (5) days before this petition is noticed to be heard;

PLEASE TAKE FURTHER NOTICE that Mr. Depp designates New York County as the place of venue pursuant to CPLR § 3119(e) on the ground that the Subpoenas requests discovery in New York County.

Dated: New York, New York
May 10, 2021

Respectfully submitted,
By: /s/ Jessica N. Meyers
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