

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. 154545/2021

Part 37

Hon. Arthur F. Engoron

Motion Sequence No. 004

**STIPULATION AND PROPOSED ORDER EXTENDING TIME  
TO RESPOND TO MOTION FOR PRODUCTION EXPENSES**

**IT IS HEREBY STIPULATED AND AGREED** by and between the undersigned attorneys for the petitioner John C. Depp, II (the “Petitioner”) and respondents American Civil Liberties Union Foundation, Benjamin Wizner, and Anthony Romero (collectively, the “Respondents”), that the return date on Petitioner’s Motion for Production Expenses (Mot. Seq. 004) (the “Motion”) is adjourned to June 15, 2022 at 9:30 a.m. in the Motion Submission Part, Room 130, 60 Centre Street, or as soon thereafter as counsel may be heard; Petitioner’s time to respond to the Motion is extended to June 1, 2022; and Respondents’ time to file a reply in further support of their Motion is extended to June 15, 2022.

Dated: April 25, 2022


**BROWN RUDNICK LLP**

By: /s/ Jessica N. Meyers  
Jessica N. Meyers  
7 Times Square  
New York, New York 10036  
Tel: (212) 209-4800  
jmeyers@brownrudnick.com

*Counsel for Petitioner John C. Depp, II*

Dated: April 25, 2022

**PATTERSON BELKNAP WEBB &  
TYLER LLP**

By:   
Stephanie Teplin  
1133 Avenue of the Americas  
New York, New York 10036  
Tel: (212) 336-2000  
steplin@pbwt.com

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

SO ORDERED:

\_\_\_\_\_  
J.S.C.