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MARY ELLEN DUNLAP  
CLERK OF SUPERIOR COURT  
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SV

1 D. CHRISTOPHER RUSSELL  
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3 THE RUSSELL'S LAW FIRM, PLC  
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7 CHARLES J. HARDER (California State Bar No. 184593)  
8 (*Pro Hac Vice* application to be filed)  
9 Charder@HMAfirm.com  
10 HARDER MIRELL & ABRAMS LLP  
11 132 S. Rodeo Drive, Suite 301  
12 Beverly Hills, California 90067  
13 Telephone:(424) 203-1600  
14 Facsimile:(424) 203-1601

15 Attorneys for Plaintiff  
16 AMBER HEARD

17 **SUPERIOR COURT OF THE STATE OF ARIZONA**  
18 **COUNTY OF COCHISE**

19 AMBER HEARD, an individual, ) Case Number: CV2016-00280  
20 )  
21 Plaintiff, )  
22 ) **SUBPOENA DUCES TECUM**  
23 vs. )  
24 )  
25 DOUG STANHOPE, an individual; )  
26 and DOES 1-20, inclusive, )  
27 ) Hon. John F. Kelliher, Jr.  
28 Defendants. )

29 **THE STATE OF ARIZONA SENDS GREETINGS TO:** Robin Baum

30 YOU ARE HEREBY COMMANDED:

31 **XX** To produce any of the following that is in your possession to **HARDER MIRELL &**  
32 **ABRAMS LLP** at the location of 132 S. Rodeo Drive, Fourth Floor, Beverly Hills, California  
33 90212, (424) 203-1600, ON OR BEFORE **August 5, 2016.**

1           **I. DEFINITIONS**

2           A.       The term "DOCUMENT" shall mean and refer to written, recorded or graphic  
3 material of any kind, including without limitation handwriting, typewriting, printing,  
4 photostating, photographing, photocopying, transmitting by electronic mail or facsimile, and  
5 every other means of recording upon any tangible thing, any form of communication or  
6 representation, including letters, words, pictures, sounds, or symbols, or combinations thereof,  
7 and any record thereby created, regardless of the manner in which the record has been stored,  
8 whether prepared by you or any other person, and shall include the original and all copies which  
9 differ from the original, including notes, underlines, marks or information not on the original.  
10 The term "DOCUMENT" also includes electronically or magnetically stored data which must be  
11 produced in reasonable and useable form. The term "DOCUMENT" includes photographs,  
12 images, video recordings, audio recordings, emails, draft emails, text messages, draft text  
13 messages, websites, webpages, web postings, social media accounts and postings, letters,  
14 facsimiles, letters, memoranda, charts, notes, calendars, calendar entries, telephone logs,  
15 telephone entries, and all other forms of written, recorded or graphic material.

16           B.       The term "COMMUNICATIONS" means any exchange of information by a  
17 method of transmission, including, without limitation, any meetings, conferences, face-to- face  
18 conversations, mails, electronic transmissions, electronic mail, text messages, iMessages,  
19 telephone, facsimile, telegram, telex or by any other medium, including written, taped or  
20 recorded (audio or video) communications of any kind.

21           C.       The terms "OR" and "AND" shall be read in the conjunctive and disjunctive  
22 wherever they appear and neither of these words shall be interpreted to limit the document  
23 demand.

24           D.       The terms "ANY", "EACH" and "ALL" shall be read to be all inclusive and to  
25 require the production of each and every document (as hereinafter defined) responsive to the  
26 particular demand for production in which such term appears.

27           E.       The term "PERSON" or "PERSONS" shall include a natural person,  
28 proprietorship, firm, association, organization, partnership, business, trust, corporation, public  
entity, or any other entity.

          F.       The term "YOU" or "YOUR" shall mean **Robin Baum** and all of her present and  
former agents, representatives, employees, affiliates, attorneys, accountants, investigators,  
consultant and all other PERSONS acting on her behalf or under her direction.

          G.       The term "JOHNNY DEPP" shall mean **Johnny Depp** and all of his present and  
former agents, assistants, representatives, employees, affiliates, attorneys, accountants,  
investigators, consultants and all other PERSONS acting on his behalf or under his direction.  
Whenever reference is made herein to Johnny Depp without all letters of his name being  
capitalized, it shall mean Johnny Depp individually, and no other PERSON.

1 H. The term "BENECIO DEL TORO" shall mean **Benecio Del Toro** and all of his  
2 present and former agents, assistants, representatives, employees, affiliates, attorneys,  
3 accountants, investigators, consultant and all other PERSONS acting on his behalf or under his  
4 direction.

4 I. The term "SLATE PR" shall mean **Slate PR** and all of its present and former  
5 agents, assistants, representatives, employees, affiliates, attorneys, accountants, investigators,  
6 consultants and all other PERSONS acting on its behalf or under its direction.

6 **II. DOCUMENTS TO BE PRODUCED**

7  
8 1. ALL DOCUMENTS in YOUR possession, custody or control that refer or relate  
9 to Amber Heard.

10 2. ALL DOCUMENTS in YOUR possession, custody or control that refer or relate  
11 to Stephen Deuters.

12 3. ALL DOCUMENTS in YOUR possession, custody or control that refer or relate  
13 to Doug Stanhope.

14 4. ALL DOCUMENTS in YOUR possession, custody or control that refer or relate  
15 to Doug Stanhope's May 29, 2015 guest column on TheWrap.com entitled "Johnny Depp Is  
16 Being Blackmailed by Amber Heard – Here's How I Know (Guest Column)."

17 5. ALL DOCUMENTS in YOUR possession, custody or control which constitute,  
18 refer or relate to any COMMUNICATIONS, from any PERSON to any PERSON, relating to  
19 Amber Heard.

20 6. ALL DOCUMENTS in YOUR possession, custody or control which constitute,  
21 refer or relate to any COMMUNICATIONS from any PERSON to any PERSON, relating to  
22 Doug Stanhope.

23 7. ALL DOCUMENTS in YOUR possession, custody or control which constitute,  
24 refer or relate to any COMMUNICATIONS from any PERSON to any PERSON, relating to  
25 Stephen Deuters.

26 8. ALL DOCUMENTS in YOUR possession, custody or control which constitute,  
27 refer or relate to any COMMUNICATIONS between YOU and BENECIO DEL TORO from  
28 April 21, 2016 to August 5, 2016.

29 9. ALL DOCUMENTS in YOUR possession, custody or control which constitute,  
30 refer or relate to any COMMUNICATIONS between SLATE PR and BENECIO DEL TORO  
31 from April 21, 2016 to August 5, 2016.

1 10. ALL DOCUMENTS in YOUR possession, custody or control which constitute,  
2 refer or relate to any COMMUNICATIONS between YOU and JOHNNY DEPP from April 21,  
3 2016 to August 5, 2016.

4 11. ALL DOCUMENTS in YOUR possession, custody or control which constitute,  
5 refer or relate to any COMMUNICATIONS between SLATE PR and JOHNNY DEPP from  
6 April 21, 2016 to August 5, 2016.

7 12. ALL DOCUMENTS in YOUR possession, custody or control that constitute,  
8 refer to or relate to video and/or audio recordings, photographs and/or images of Amber Heard.

9 13. ALL DOCUMENTS in YOUR possession, custody or control that refer or relate  
10 to any consumption or possible consumption of alcohol or drugs by Johnny Depp.

11 14. ALL DOCUMENTS in YOUR possession, custody or control that refer or relate  
12 to any instances or possible instances of anger, shouting, yelling, scolding or speaking in a harsh  
13 tone, by Johnny Depp toward any PERSON, including without limitation, Amber Heard, Vanessa  
14 Paradis, other girlfriends or spouses of Johnny Depp, any acquaintances, friends, dates,  
15 employees, or contractors of Johnny Depp or his companies, photographers, videographers, news  
16 reporters, and/or strangers.

17 15. ALL DOCUMENTS in YOUR possession, custody or control that refer or relate  
18 to any instances or possible instances of unwelcome touching by Johnny Depp toward any  
19 PERSON, including without limitation hitting, slapping, kicking, grabbing, pulling, thrashing,  
20 choking, smothering, grappling, or groping, by Johnny Depp toward any PERSON, including  
21 without limitation Amber Heard, Vanessa Paradis, other girlfriends or spouses of Johnny Depp,  
22 any acquaintances, friends, dates, employees, or contractors of Johnny Depp or his companies,  
23 photographers, videographers, news reporters, and/or strangers.

24 16. ALL DOCUMENTS in YOUR possession, custody or control that refer or relate  
25 to any complaints and/or criticisms against or about Johnny Depp by any PERSON regarding any  
26 matter, from January 1, 2009 until the present.

27 17. ALL DOCUMENTS in YOUR possession, custody or control that refer or relate  
28 to any legal demands, claims or allegations made against, about or involving Johnny Depp  
regarding any matters by any PERSON from January 1, 2009 until the present.

**YOUR DUTIES IN RESPONDING TO THIS SUBPOENA:**

You have the duty to produce the documents requested as they are kept by you in the usual course of business, or you may organize the documents and label them to correspond with the categories set forth in this subpoena. See Rule 45(d)(1) of the Arizona Rules of Civil Procedure.

If this subpoena asks you to produce and permit inspection and copying of designated books, papers, documents, tangible things, or the inspection of premises, you need not appear to

1 produce the items unless the subpoena states that you must appear for a deposition, hearing or  
2 trial. See Rule 45(c)(2))A) of the Arizona Rules of Civil Procedure.

3  
4 **YOUR RIGHT TO OBJECT:**

5 The party or attorney serving the subpoena has a duty to take reasonable steps to avoid  
6 imposing an undue burden or expense on you. The Superior Court enforces this duty and may  
7 impose sanctions upon the party or attorney serving the subpoena if this duty is breached. See  
8 Rule 45(c)(1) of the Arizona Rules of Civil Procedure.

9 You may object to this subpoena if you feel that you should not be required to respond to  
10 the request(s) made. Any objection to this subpoena must be made within 14 days after it is  
11 served upon you, or before the time specified for compliance, by providing a written objection to  
12 the party or attorney serving the subpoena. See Rule 45(c)(2)(B) of the Arizona Rules of Civil  
13 Procedure.

14 If you object because you claim the information requested is privileged or subject to  
15 protection as trial preparation material, you must express the objection clearly, and support each  
16 objection with a description of the nature of the document, communication or item not produced  
17 so that the demanding party can contest the claim. See Rule 45(d)(2) of the Arizona Rules of  
18 Civil Procedure.

19 If you object to the subpoena in writing you do not need to comply with the subpoena  
20 until a court orders you to do so. It will be up to the party or attorney serving the subpoena to  
21 seek an order from the court to compel you to provide the documents or inspection requested,  
22 after providing notice to you. See Rule 45(c)(2)(B) of the Arizona Rules of Civil Procedure.

23 If you are not a party to the litigation, or an officer of a party, the court will issue an order  
24 to protect you from any significant expense resulting from the inspection and copying  
25 commanded. See Rule 45(c)(2)(B) of the Arizona Rules of Civil Procedure.

26 You also may file a motion in the superior court of the county in which the case is  
27 pending to quash or modify the subpoena if the subpoena:

28 (i) does not provide a reasonable time for compliance;

(ii) requires a non-party or officer of a party to travel to a county different from the county  
where the person resides or does business in person; or to travel to a county different from where  
the subpoena was served; or to travel to a place farther than 40 miles from the place of service; or  
to travel to a place different from any other convenient place fixed by an order of a court, except  
that a subpoena for you to appear and testify at trial can command you to travel from any place  
within the state;

(iii) requires the disclosure of privileged or protected information and no waiver or  
exception applies; or

(iv) subjects you to an undue burden. See Rule 45(c)(3)(A) of the Arizona Rules of Civil  
Procedure.

If this subpoena:

(i) requires disclosure of a trade secret or other confidential research, development, or  
commercial trade information; or

(ii) requires disclosure of an untrained expert's opinion or information not describing  
specific events or occurrences in dispute and resulting from the expert's study made not at the  
request of any party; or

1 (iii) requires a person who is not a party or an officer of a party to incur substantial travel  
2 expense;

3 The court may either quash or modify the subpoena, or the court may order you to appear  
4 or produce documents only upon specified conditions, if the party who served the subpoena  
5 shows a substantial need for the testimony or material that cannot be otherwise met without  
6 undue hardship and assures that you will be reasonably compensated. See Rule 45(c)(3)(B) of the  
7 Arizona Rules of Civil Procedure.

8 A command to produce evidence or to permit inspection may be joined with a command  
9 to appear at trial or hearing or at deposition, or may be issued separately.

10 **IF YOU FAIL TO APPEAR AS ORDERED, A WARRANT MAY BE ISSUED  
11 FOR YOUR ARREST.**

12 If you have any questions concerning your appearance, please call the attorney whose  
13 name appears below.

14 **REQUESTS FOR REASONABLE ACCOMMODATION FOR PERSONS WITH  
15 DISABILITIES MUST BE MADE TO THE COURT BY PARTIES AT LEAST THREE  
16 (3) WORKING DAYS IN ADVANCE OF A SCHEDULED COURT PROCEEDING.**

17 WITNESS My Hand and the Seal of the Superior Court.

18 DATED:

19 MARY ELLEN DUNLAP  
20 CLERK OF THE SUPERIOR COURT

21   
22 \_\_\_\_\_  
23 Attorneys for Plaintiff  
24 Party requesting Subpoena

25 By   
26 \_\_\_\_\_  
27 Deputy Clerk

28 **ATTORNEY'S NAME, ADDRESS, PHONE:**

D. Christopher Russell, Esq.  
The Russell's Law Firm, PLC  
741 East Fry Boulevard, Suite 200  
Sierra Vista, Arizona 85635  
(855) 707-7246

-and-

CHARLES J. HARDER  
HARDER MIRELL & ABRAMS LLP  
132 S Rodeo Drive, Suite 301  
Beverly Hills, California 90067  
(a pro hac vice application pursuant to Rule 39(c),  
ARIZ. R. S. CT. shall be filed forthwith)

Attorneys for Plaintiff AMBER HEARD