

VIRGINIA:

IN THE CIRCUIT COURT OF FAIRFAX COUNTY

JOHN C. DEPP, II

Plaintiff,

v.

AMBER LAURA HEARD

Defendant.

Civil Action No.: CL-2019-00029

FILED
COURT SERVICES
2019 AUG 23 3:02

JOHN T. FREY
CLERK, CIRCUIT COURT
FAIRFAX, VA

CERTIFICATE OF COUNSEL

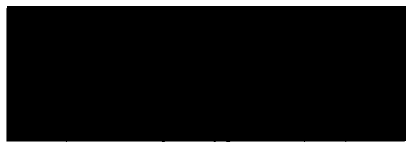
I, Richard A. Schwartz, counsel for Defendant, Amber Laura Heard, hereby certify that a copy of the following documents:

**Amended Subpoena for Production of Business Records
in Action Pending Outside California; and
Amended Subpoena Duces Tecum (Civil) – Attorney Issued – FilmLA;**

**Amended Subpoena for Production of Business Records
in Action Pending Outside California; and Amended Subpoena
Duces Tecum (Civil) – Attorney Issued – Jerry Bruckheimer Films; and**

**Amended Subpoena for Production of Business Records
in Action Pending Outside California; and Amended Subpoena
Duces Tecum (Civil) – Attorney Issued – Walt Disney Pictures**

were emailed to counsel of record for Plaintiff (See Service List below), on the 21st day of August, 2019.



Richard A. Schwartz

SERVICE LIST

John C. Depp, II v Amber Laura Heard
Circuit Court of Fairfax County, Case No. CL-2019-0002911

Robert Gilmore (pro hac vice pending)
Kevin Attridge (pro hac vice pending)
STEIN MITCHELL BEATO
& MISSNER LLP
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Washington, DC 20005
Tel. (202) 601-1602, or 1589
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rgilmore@steinmitchell.com;
kattridge@steinmitchell.com

Counsel for Plaintiff John C. Depp, II

Adam R. Waldman, Esq. (pro hac vice
pending)
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1775 Pennsylvania Avenue, NW, Suite 350
Washington, DC 20006

Benjamin G. Chew, Esq. (VSB 29113)
Elliot J. Weingarten (pro hac vice)
Andrew C. Crawford (VSB No. 89093)
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cvasquez@brownrudnick.com

Timothy J. McEvoy, Esq.
Sean Patrick Roche, Esq.
CAMERON/McEVOY, PLLC
4100 Monument Corner Drive, Suite 420
Fairfax, VA 22030
Tel. (703) 460-9343
Fax. (703) 273-8897
tmcevoy@cameronmcevoy.com
sroche@cameronmcevoy.com

Counsel for Defendant Amber Laura Heard

| | |
|---|--|
| ATTORNEY OR PARTY WITHOUT ATTORNEY (Name, State-Bar number, and address): Richard A. Schwartz (SBN 267469)/ Milin Chun (SBN 262674) Browne George Ross LLP 2121 Avenue of the Stars Los Angeles, CA 90067 TELEPHONE NO.: 310.274.7100 FAX NO.: 310.275.5697 E-MAIL ADDRESS: rschwartz@bgrfirm.com ATTORNEY FOR (Name): Defendant AMBER LAURA HEARD | FOR COURT USE ONLY FILED COURT SERVICES 2019 AUG 23 3:02 JOHN T. FREY CLERK, CIRCUIT COURT FAIRFAX, VA |
| Court for county in which discovery is to be conducted: SUPERIOR COURT OF CALIFORNIA, COUNTY OF STREET ADDRESS: MAILING ADDRESS: CITY, STATE, AND ZIP CODE: BRANCH NAME: | |
| Court in which action is pending: Name of Court: In The Circuit Court of Fairfax County, Virginia STREET ADDRESS: 4110 Chain Bridge Road MAILING ADDRESS: CITY, STATE, AND ZIP CODE: Fairfax, VA 22030-4009 COUNTRY: U.S.A. | |
| PLAINTIFF/PETITIONER: JOHN C. DEPP, II DEFENDANT/RESPONDENT: AMBER LAURA HEARD | CALIFORNIA CASE NUMBER (if any assigned by court): |
| SUBPOENA FOR PRODUCTION OF BUSINESS RECORDS IN ACTION PENDING OUTSIDE CALIFORNIA | CASE NUMBER (of action pending outside California): CL-2019-0002911 |

THE PEOPLE OF THE STATE OF CALIFORNIA, TO (name, address, and telephone number of deponent, if known):
 Film LA, 6255 W. Sunset Boulevard, 12th Floor, Hollywood, California 90028; Tel: 213-977-8600

1. YOU ARE ORDERED TO PRODUCE THE BUSINESS RECORDS described in item 3, as follows:

To (name of deposition officer): First Legal Records Retrieval
 On (date): September 13, 2019 At (time): 10:00 a.m.
 Location (address): 1511 West Beverly Boulevard, Los Angeles, California 90026

Do not release the requested records to the deposition officer prior to the date and time stated above.

- a. by delivering a true, legible, and durable copy of the business records described in item 3, enclosed in a sealed inner wrapper with the title and number of the action, name of witness, and date of subpoena clearly written on it. The inner wrapper shall then be enclosed in an outer envelope or wrapper, sealed, and mailed to the deposition officer at the address in item 1.
- b. by delivering a true, legible, and durable copy of the business records described in item 3 to the deposition officer at the witness's address, on receipt of payment in cash or by check of the reasonable costs of preparing the copy, as determined under Evidence Code section 1563(b).
- c. by making the original business records described in item 3 available for inspection at your business address by the attorney's representative and permitting copying at your business address under reasonable conditions during normal business hours.
2. The records are to be produced by the date and time shown in item 1 (but not sooner than 20 days after the issuance of the deposition subpoena, or 15 days after service, whichever date is later). Reasonable costs of locating records, making them available or copying them, and postage, if any, are recoverable as set forth in Evidence Code section 1563(b). The records must be accompanied by an affidavit of the custodian or other qualified witness pursuant to Evidence Code section 1561.
3. The records to be produced are described as follows (if electronically stored information is demanded, the form or forms in which each type of information is to be produced may be specified): See Attachment 3
- Continued on Attachment 3 (use form MC-025).
4. Attorneys of record in this action or parties without attorneys are (name, address, telephone number, and name of party represented): See Attachment 4
- Continued on Attachment 4 (use form MC-025).

PLAINTIFF/PETITIONER: JOHN C. DEPP, II
DEFENDANT/RESPONDENT: AMBER LAURA HEARD

CASE NUMBER (of action pending outside California):
CL-2019-0002911

5. If you have been served with this subpoena as a custodian of consumer or employee records under Code of Civil Procedure section 1985.6 and a motion to quash or an objection has been served on you, a court order or agreement of the parties, witnesses, and consumer or employee affected must be obtained before you are required to produce consumer or employee records.

6. Other terms or provisions from out-of-state subpoena, if any (specify):

Continued on Attachment 6 (use form MC-025).

DISOBEDIENCE OF THIS SUBPOENA MAY BE PUNISHED AS CONTEMPT BY THIS COURT. YOU WILL ALSO BE LIABLE FOR THE SUM OF \$500 AND ALL DAMAGES RESULTING FROM YOUR FAILURE TO OBEY.

Date Issued: August 21, 2019

Richard A. Schwartz
(TYPE OR PRINT NAME)

[Redacted Signature]

(SIGNATURE OF PERSON ISSUING SUBPOENA)

Attorneys for Defendant AMBER LAURA HEARD
(TITLE)

PROOF OF SERVICE OF SUBPOENA FOR PRODUCTION OF BUSINESS RECORDS

1. I served this Subpoena for Production of Business Records In Action Pending Outside California by personally delivering a copy to the person served as follows:

- a. Person served (name):
- b. Address where served:

c. Date of delivery:

d. Time of delivery:

e. Witness fees and mileage both ways (check one):

- (1) were paid. Amount:..... \$ _____
- (2) were not paid.
- (3) were tendered to the witness's public entity employer as required by Government Code section 68097.2. The amount tendered was (specify): \$ _____

f. Fee for service:..... \$ _____

2. I received this subpoena for service on (date):

3. I also served a completed Proof of Service of Notice to Consumer or Employee and Objection (form SUBP-025) by personally delivering a copy to the person served as described in 1 above.

4. Person serving:

- a. Not a registered California process server
- b. California sheriff or marshal
- c. Registered California process server
- d. Employee or independent contractor of a registered California process server
- e. Exempt from registration under Business and Professions Code section 22350(b)
- f. Registered professional photocopier
- g. Exempt from registration under Business and Professions Code section 22451
- h. Name, address, telephone number, and, if applicable, county of registration and number:

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

Date:

(For California sheriff or marshal use only)
I certify that the foregoing is true and correct.

Date:

(SIGNATURE)

(SIGNATURE)

Attachment 3

**John C. Depp, II v. Amber Laura Heard
Fairfax County Circuit Court: CL 2019-0002911**

DOCUMENTS TO BE PRODUCED UNDER THIS SUBPOENA

In response to this subpoena, YOU are required to produce the original or an exact copy of the following:

1. Any and all Daily Production Reports from the set of City of Lies from April 13, 2017 to April 17, 2017.
2. Any and all metadata, including but not limited to, Custodian, eDoc_Author, eDoc_Create_DATE, eDoc_Create_TIME, eDoc_Mod-DATE, and eDoc_Mod_TIME, for the Daily Production Reports from the set of City of Lies from April 13, 2017 to April 17, 2017.

| | |
|---|---------------------------------|
| SHORT TITLE: JOHN C. DEPP, II v. AMBER LAURA HEARD | CASE NUMBER: CL-2019-0002911 |
|---|---------------------------------|

ATTACHMENT (Number): 4

(This Attachment may be used with any Judicial Council form.)

Robert Gilmore (pro hac vice pending) Counsel for John C. Depp, II
 STEIN MITCHELL BEATO & MISSNER LLP
 901 Fifteenth Street, NW, Suite 700
 Washington, DC 20005
 Tel. (202) 601-1602, or 1589
 Fax (202) 296-8312
 rgilmore@steinmitchell.com

Adam R. Waldman, Esq. (pro hac vice pending) Counsel for John C. Depp, II
 THE ENDEAVOR LAW FIRM, P.C.
 1775 Pennsylvania Avenue, NW, Suite 350
 Washington, DC 20006

Benjamin G. Chew, Esq. (VSB 29113) Counsel for John C. Depp, II
 Elliot J. Weingarten (pro hac vice pending)
 Andrew C. Crawford (VSB No. 89093)
 BROWN RUDNICK LLP
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 (202) 536-1700
 (202) 536-1701 – FAX
 bchew@brownrudnick.com

Camille M. Vasquez (pro hac vice pending) Counsel for John C. Depp, II
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Timothy J. McEvoy, Esq. (VSB No. 33277) Counsel for Amber Laura Heard
 Sean Patrick Roche, Esq. (VSB No. 71412)
 CAMERON/McEVOY, PLLC
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 Fairfax, Virginia 22030
 703.460.9343 (Direct)
 703.273.8898 (Office)
 703.273.8897 (Fax)
 tmcevoy@cameronmcevoy.com
 sroche@cameronmcevoy.com

Eric M. George, Esq. (SBN 166403) Counsel for Amber Laura Heard
 Richard A. Schwartz (SBN 267469)
 BROWNE GEORGE ROSS LLP
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 Tel. (310) 274-7100
 Fax. (310) 275-5697
 egeorge@bgrfirm.com
 rschwartz@bgrfirm.com

(If the item that this Attachment concerns is made under penalty of perjury, all statements in this Attachment are made under penalty of perjury.)

Page _____ of _____

(Add pages as required)

| | |
|---|---------------------------------|
| SHORT TITLE: JOHN C. DEPP, II v. AMBER LAURA HEARD | CASE NUMBER: CL-2019-0002911 |
|---|---------------------------------|

ATTACHMENT (Number): 6

(This Attachment may be used with any Judicial Council form.)

See attached Fairfax County Circuit Court Subpoena

(If the item that this Attachment concerns is made under penalty of perjury, all statements in this Attachment are made under penalty of perjury.)

Page _____ of _____

(Add pages as required)

SUBPOENA DUCES TECUM (CIVIL) –
ATTORNEY ISSUED VA. CODE §§ 8.01-413, 16.1-39, 16.1-265;
Commonwealth of Virginia Supreme Court Rules 1:4, 4:9

Case No.: CL2019-0002911
9/13/2019 at 10:00 a.m.
HEARING DATE AND TIME

Fairfax County Circuit Court
4110 Chain Bridge Road, Fairfax, Virginia 22030
COURT ADDRESS

John C. Depp, II v./In re: Amber Laura Heard

TO THE PERSON AUTHORIZED BY LAW TO SERVE THIS PROCESS:

You are commanded to summon

FilmL.A., Inc., SERVE: Paul Audley, RA
NAME
6255 W. Sunset Blvd., 12th Floor
STREET ADDRESS
Hollywood California 90028
CITY STATE ZIP

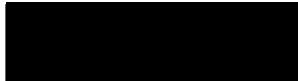
TO the person summoned: You are commanded to make available the documents and tangible things designated and described below:

See Schedule A attached hereto.

First Legal Records Retrieval
at 1511 West Beverly Boulevard, Los Angeles, CA 90026 at 9/13/2019 at 10:00 a.m.
LOCATION DATE AND TIME

to permit such party or someone acting in his or her behalf to inspect and copy, test or sample such tangible things in your possession, custody or control.

This Subpoena Duces Tecum is issued by the attorney for and on behalf of

Defendant Amber Laura Heard
PARTY NAME
Sean Patrick Roche/ Cameron McEvoy, PLLC
NAME OF ATTORNEY 71412
VIRGINIA STATE BAR NUMBER
4100 Monument Corner Drive, Suite 420
OFFICE ADDRESS 703-273-8898
TELEPHONE NUMBER OF ATTORNEY
Fairfax, Virginia 22030
OFFICE ADDRESS 703-273-8897
FACSIMILE NUMBER OF ATTORNEY
August 21, 2019
DATE ISSUED 
SIGNATURE OF ATTORNEY

Notice to Recipient: See page two for further information.

RETURN OF SERVICE (see page two of this form)

TO the person summoned:

If you are served with this subpoena less than 14 days prior to the date that compliance with this subpoena is required, you may object by notifying the party who issued the subpoena of your objection in writing and describing the basis of your objection in that writing.

This SUBPOENA DUCES TECUM is being served by a private process server who must provide proof of service in accordance with Va. Code § 8.01-325.

TO the person authorized to serve this process: Upon execution, the return of this process shall be made to the clerk of court.

| | |
|---|-------------------------|
| NAME: | |
| ADDRESS: | |
| <input type="checkbox"/> PERSONAL SERVICE | Tel. No. |
| Being unable to make personal service, a copy was delivered in the following manner: | |
| <input type="checkbox"/> Delivered to family member (not temporary sojourner or guest) age 16 or older at usual place of abode of party named above after giving information of its purport. List name, age of recipient, and relation of recipient to party named above: | |
| | |
| <input type="checkbox"/> Posted on front door or such other door as appear to be the main entrance of usual place of abode, address listed above. (Other authorized recipient not found.) | |
| <input type="checkbox"/> NOT FOUND |, Sheriff |
| DATE | by Deputy Sheriff |

CERTIFICATE OF COUNSEL

I, Sean Patrick Roche, counsel for Defendant, hereby certify that a copy of the foregoing subpoena duces tecum was emailed to all counsel, counsel of record for Plaintiff, on the 21st day of August, 2019.

[Redacted Signature]

SIGNATURE OF ATTORNEY

NOTICE: Upon receipt of the subpoenaed documents, the requesting party must, if requested, provide true and full copies of those documents to any other party or to the attorney for any other party, provided the other party or attorney for the other party pays the reasonable cost of copying or reproducing those documents. This does not apply when the subpoenaed documents are returnable to and maintained by the clerk of the court in which the action is pending. Va. Code § 8.01-417

SCHEDULE A

**John C. Depp, II v. Amber Laura Heard
Fairfax County Circuit Court: CL 2019-0002911**

DOCUMENTS TO BE PRODUCED UNDER THIS SUBPOENA

In response to this subpoena, YOU are required to produce the original or an exact copy of the following:

1. Any and all Daily Production Reports from the set of City of Lies from April 13, 2017 to April 17, 2017.
2. Any and all metadata, including but not limited to, Custodian, eDoc_Author, eDoc_Create_DATE, eDoc_Create_TIME, eDoc_Mod-DATE, and eDoc_Mod_TIME, for the Daily Production Reports from the set of City of Lies from April 13, 2017 to April 17, 2017.

| | |
|---|--|
| ATTORNEY OR PARTY WITHOUT ATTORNEY (Name, State Bar number, and address): Richard A. Schwartz (SBN 267469)/ Milin Chun (SBN 262674) Browne George Ross LLP 2121 Avenue of the Stars Los Angeles, CA 90067 TELEPHONE NO.: 310.274.7100 FAX NO.: 310.275.5697 E-MAIL ADDRESS: rschwartz@bgrfirm.com ATTORNEY FOR (Name): Defendant AMBER LAURA HEARD | FOR COURT USE ONLY FILED COURT SERVICES 2019 AUG 23 10 3: 02 JOHN T. FREY CLERK, CIRCUIT COURT FAIRFAX, VA |
| Court for county in which discovery is to be conducted: SUPERIOR COURT OF CALIFORNIA, COUNTY OF STREET ADDRESS: MAILING ADDRESS: CITY, STATE, AND ZIP CODE: BRANCH NAME: | |
| Court in which action is pending: Name of Court: In The Circuit Court of Fairfax County, Virginia STREET ADDRESS: 4110 Chain Bridge Road MAILING ADDRESS: CITY, STATE, AND ZIP CODE: Fairfax, VA 22030-4009 COUNTRY: U.S.A. | |
| PLAINTIFF/PETITIONER: JOHN C. DEPP, II DEFENDANT/RESPONDENT: AMBER LAURA HEARD | CALIFORNIA CASE NUMBER (if any assigned by court): |
| SUBPOENA FOR PRODUCTION OF BUSINESS RECORDS IN ACTION PENDING OUTSIDE CALIFORNIA | CASE NUMBER (of action pending outside California): CL-2019-0002911 |

THE PEOPLE OF THE STATE OF CALIFORNIA, TO (name, address, and telephone number of deponent, if known):
 Jerry Bruckheimer Films, 1631 10th Street, Santa Monica, California 90404-3705; Tel: 310.664.6260

1. YOU ARE ORDERED TO PRODUCE THE BUSINESS RECORDS described in Item 3, as follows:

To (name of deposition officer): First Legal Records Retrieval
 On (date): September 13, 2019 At (time): 10:00 a.m.
 Location (address): 1511 West Beverly Boulevard, Los Angeles, California 90026

Do not release the requested records to the deposition officer prior to the date and time stated above.

- a. by delivering a true, legible, and durable copy of the business records described in item 3, enclosed in a sealed inner wrapper with the title and number of the action, name of witness, and date of subpoena clearly written on it. The inner wrapper shall then be enclosed in an outer envelope or wrapper, sealed, and mailed to the deposition officer at the address in item 1.
- b. by delivering a true, legible, and durable copy of the business records described in item 3 to the deposition officer at the witness's address, on receipt of payment in cash or by check of the reasonable costs of preparing the copy, as determined under Evidence Code section 1563(b).
- c. by making the original business records described in item 3 available for inspection at your business address by the attorney's representative and permitting copying at your business address under reasonable conditions during normal business hours.
2. The records are to be produced by the date and time shown in item 1 (but not sooner than 20 days after the issuance of the deposition subpoena, or 15 days after service, whichever date is later). Reasonable costs of locating records, making them available or copying them, and postage, if any, are recoverable as set forth in Evidence Code section 1563(b). The records must be accompanied by an affidavit of the custodian or other qualified witness pursuant to Evidence Code section 1561.
3. The records to be produced are described as follows (if electronically stored information is demanded, the form or forms in which each type of information is to be produced may be specified): See Attachment 3
- Continued on Attachment 3 (use form MC-025).
4. Attorneys of record in this action or parties without attorneys are (name, address, telephone number, and name of party represented): See Attachment 4
- Continued on Attachment 4 (use form MC-025).

| | |
|---|--|
| PLAINTIFF/PETITIONER: JOHN C. DEPP, II | CASE NUMBER (of action pending outside California): CL-2019-0002911 |
| DEFENDANT/RESPONDENT: AMBER LAURA HEARD | |

5. If you have been served with this subpoena as a custodian of consumer or employee records under Code of Civil Procedure section 1985.6 and a motion to quash or an objection has been served on you, a court order or agreement of the parties, witnesses, and consumer or employee affected must be obtained before you are required to produce consumer or employee records.

6. Other terms or provisions from out-of-state subpoena, if any (specify):

Continued on Attachment 6 (use form MC-025).

DISOBEDIENCE OF THIS SUBPOENA MAY BE PUNISHED AS CONTEMPT BY THIS COURT. YOU WILL ALSO BE LIABLE FOR THE SUM OF \$500 AND ALL DAMAGES RESULTING FROM YOUR FAILURE TO OBEY.

Date issued: August 21, 2019

Richard Schwartz
(TYPE OR PRINT NAME)



(SIGNATURE OF PERSON ISSUING SUBPOENA)

Attorneys for Defendant AMBER LAURA HEARD
(TITLE)

PROOF OF SERVICE OF SUBPOENA FOR PRODUCTION OF BUSINESS RECORDS

1. I served this Subpoena for Production of Business Records In Action Pending Outside California by personally delivering a copy to the person served as follows:

a. Person served (name):

b. Address where served:

c. Date of delivery:

d. Time of delivery:

e. Witness fees and mileage both ways (check one):

(1) were paid. Amount: \$ _____

(2) were not paid.

(3) were tendered to the witness's public entity employer as required by Government Code section 68097.2. The amount tendered was (specify): \$ _____

f. Fee for service: \$ _____

2. I received this subpoena for service on (date):

3. I also served a completed Proof of Service of Notice to Consumer or Employee and Objection (form SUBP-025) by personally delivering a copy to the person served as described in 1 above.

4. Person serving:

a. Not a registered California process server

b. California sheriff or marshal

c. Registered California process server

d. Employee or independent contractor of a registered California process server

e. Exempt from registration under Business and Professions Code section 22350(b)

f. Registered professional photocopier

g. Exempt from registration under Business and Professions Code section 22451

h. Name, address, telephone number, and, if applicable, county of registration and number:

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

Date:

(For California sheriff or marshal use only)
I certify that the foregoing is true and correct.

Date:

(SIGNATURE)

(SIGNATURE)

Attachment 3

John C. Depp, II v. Amber Laura Heard
Fairfax County Circuit Court: CL 2019-0002911

DOCUMENTS TO BE PRODUCED UNDER THIS SUBPOENA

In response to this subpoena, YOU are required to produce the original or an exact copy of the following:

1. Any and all Daily Production Reports from the set of Pirates of the Caribbean: Dead Man Tell No Tales from February 17, 2015 through July 21, 2015.
2. Any and all metadata, including but not limited to, Custodian, eDoc_Author, eDoc_Create_DATE, eDoc_Create_TIME, eDoc_Mod_DATE, and eDoc_Mod_TIME, for Daily Production Reports from the set of Pirates of the Caribbean: Dead Man Tell No Tales from February 17, 2015 through July 21, 2015.
3. Any and all Daily Production Reports from the set of Pirates of the Caribbean: Dead Man Tell No Tales from March 24, 2016 through April 13, 2016.
4. Any and all metadata, including but not limited to, Custodian, eDoc_Author, eDoc_Create_DATE, eDoc_Create_TIME, eDoc_Mod_DATE, and eDoc_Mod_TIME, for Daily Production Reports from the set of Pirates of the Caribbean: Dead Man Tell No Tales from March 24, 2016 through April 13, 2016.

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|---|---------------------------------|
| SHORT TITLE: JOHN C. DEPP, II v. AMBER LAURA HEARD | CASE NUMBER: CL-2019-0002911 |
|---|---------------------------------|

ATTACHMENT (Number): 4*(This Attachment may be used with any Judicial Council form.)*

Robert Gilmore (pro hac vice pending) Counsel for John C. Depp, II
 STEIN MITCHELL BEATO & MISSNER LLP
 901 Fifteenth Street, NW, Suite 700
 Washington, DC 20005
 Tel. (202) 601-1602, or 1589
 Fax (202) 296-8312
 rgilmore@steinmitchell.com

Adam R. Waldman, Esq. (pro hac vice pending) Counsel for John C. Depp, II
 THE ENDEAVOR LAW FIRM, P.C.
 1775 Pennsylvania Avenue, NW, Suite 350
 Washington, DC 20006

Benjamin G. Chew, Esq. (VSB 29113) Counsel for John C. Depp, II
 Elliot J. Weingarten (pro hac vice pending)
 Andrew C. Crawford (VSB No. 89093)
 BROWN RUDNICK LLP
 601 Thirteenth Street, NW
 Washington, DC 20005
 (202) 536-1700
 (202) 536-1701 – FAX
 bchew@brownrudnick.com

Camille M. Vasquez (pro hac vice pending) Counsel for John C. Depp, II
 BROWN RUDNICK LLP
 2211 Michelson Drive
 Irvine, CA 92612
 Tel. (949) 752-7100
 Fax (949) 252-1514
 cvasquez@brownrudnick.com

Timothy J. McEvoy, Esq. (VSB No. 33277) Counsel for Amber Laura Heard
 Sean Patrick Roche, Esq. (VSB No. 71412)
 CAMERON/McEVOY, PLLC
 4100 Monument Corner Drive, Suite 420
 Fairfax, Virginia 22030
 703.460.9343 (Direct)
 703.273.8898 (Office)
 703.273.8897 (Fax)
 tmcevoy@cameronmcevoy.com
 sroche@cameronmcevoy.com

Eric M. George, Esq. (SBN 166403) Counsel for Amber Laura Heard
 Richard A. Schwartz (SBN 267469)
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 egeorge@bgrfirm.com
 rschwartz@bgrfirm.com

(If the item that this Attachment concerns is made under penalty of perjury, all statements in this Attachment are made under penalty of perjury.)

Page _____ of _____

(Add pages as required)

| | |
|--|--|
| SHORT TITLE: JOHN C. DEPP, II v. AMBER LAURA HEARD | CASE NUMBER: CL-2019-0002911 |
|--|--|

ATTACHMENT (Number): 6

(This Attachment may be used with any Judicial Council form.)

See attached Fairfax County Circuit Court Subpoena

(If the item that this Attachment concerns is made under penalty of perjury, all statements in this Attachment are made under penalty of perjury.)

Page _____ of _____
(Add pages as required)

SUBPOENA DUCES TECUM (CIVIL) –
ATTORNEY ISSUED VA. CODE §§ 8.01-413, 16.1-89, 16.1-265;
Commonwealth of Virginia Supreme Court Rules 1:4, 4:9

Case No.: CL2019-0002911

9/13/2019 at 10:00 a.m.
HEARING DATE AND TIME

Fairfax County Circuit Court
4110 Chain Bridge Road, Fairfax, Virginia 22030
COURT ADDRESS

John C. Depp, II v./In re: Amber Laura Heard

TO THE PERSON AUTHORIZED BY LAW TO SERVE THIS PROCESS:

You are commanded to summon

Jerry Bruckheimer Films, SERVE: Jerry Bruckheimer
NAME
1631 10th Street
STREET ADDRESS
Santa Monica California 90404-3705
CITY STATE ZIP

TO the person summoned: You are commanded to make available the documents and tangible things designated and described below:

See Schedule A attached hereto.

First Legal Records Retrieval
at 1511 West Beverly Boulevard, Los Angeles, CA 90026 at 9/13/2019 at 10:00 a.m.
LOCATION DATE AND TIME

to permit such party or someone acting in his or her behalf to inspect and copy, test or sample such tangible things in your possession, custody or control.

This Subpoena Duces Tecum is issued by the attorney for and on behalf of

Defendant Amber Laura Heard
PARTY NAME

Sean Patrick Roche/ Cameron McEvoy, PLLC
NAME OF ATTORNEY

4100 Monument Corner Drive, Suite 420
OFFICE ADDRESS

Fairfax, Virginia 22030
OFFICE ADDRESS

August 21, 2019
DATE ISSUED

71412
VIRGINIA STATE BAR NUMBER

703-273-8898
TELEPHONE NUMBER OF ATTORNEY

703-273-8897
FACSIMILE NUMBER OF ATTORNEY


SIGNATURE OF ATTORNEY

Notice to Recipient: See page two for further information.

RETURN OF SERVICE (see page two of this form)

TO the person summoned:

If you are served with this subpoena less than 14 days prior to the date that compliance with this subpoena is required, you may object by notifying the party who issued the subpoena of your objection in writing and describing the basis of your objection in that writing.

This SUBPOENA DUCES TECUM is being served by a private process server who must provide proof of service in accordance with Va. Code § 8.01-325.

TO the person authorized to serve this process: Upon execution, the return of this process shall be made to the clerk of court.

NAME:

ADDRESS:

PERSONAL SERVICE Tel. No.

Being unable to make personal service, a copy was delivered in the following manner:

Delivered to family member (not temporary sojourner or guest) age 16 or older at usual place of abode of party named above after giving information of its purport. List name, age of recipient, and relation of recipient to party named above:

Posted on front door or such other door as appear to be the main entrance of usual place of abode, address listed above. (Other authorized recipient not found.)

NOT FOUND , Sheriff

..... by Deputy Sheriff
DATE

CERTIFICATE OF COUNSEL

I, Sean Patrick Roche, counsel for Defendant, hereby certify

that a copy of the foregoing subpoena duces tecum was emailed
DELIVERY METHOD

to all counsel, counsel of record for Plaintiff,

on the 21st day of August, 2019


SIGNATURE OF ATTORNEY

NOTICE: Upon receipt of the subpoenaed documents, the requesting party must, if requested, provide true and full copies of those documents to any other party or to the attorney for any other party, provided the other party or attorney for the other party pays the reasonable cost of copying or reproducing those documents. This does not apply when the subpoenaed documents are returnable to and maintained by the clerk of the court in which the action is pending. Va. Code § 8.01-417

SCHEDULE A

**John C. Depp, II v. Amber Laura Heard
Fairfax County Circuit Court: CL 2019-0002911**

DOCUMENTS TO BE PRODUCED UNDER THIS SUBPOENA

In response to this subpoena, YOU are required to produce the original or an exact copy of the following:

1. Any and all Daily Production Reports from the set of Pirates of the Caribbean: Dead Man Tell No Tales from February 17, 2015 through July 21, 2015.
2. Any and all metadata, including but not limited to, Custodian, eDoc_Author, eDoc_Create_DATE, eDoc_Create_TIME, eDoc_Mod_DATE, and eDoc_Mod_TIME, for Daily Production Reports from the set of Pirates of the Caribbean: Dead Man Tell No Tales from February 17, 2015 through July 21, 2015.
3. Any and all Daily Production Reports from the set of Pirates of the Caribbean: Dead Man Tell No Tales from March 24, 2016 through April 13, 2016.
4. Any and all metadata, including but not limited to, Custodian, eDoc_Author, eDoc_Create_DATE, eDoc_Create_TIME, eDoc_Mod_DATE, and eDoc_Mod_TIME, for Daily Production Reports from the set of Pirates of the Caribbean: Dead Man Tell No Tales from March 24, 2016 through April 13, 2016.

| | |
|---|--|
| ATTORNEY OR PARTY WITHOUT ATTORNEY (Name, State Bar number, and address): Richard A. Schwartz (SBN 267469)/ Milin Chun (SBN 262674) Browne George Ross LLP 2121 Avenue of the Stars Los Angeles, CA 90067 TELEPHONE NO.: 310.274.7100 FAX NO.: 310.275.5697 E-MAIL ADDRESS: rschwartz@bgrfirm.com ATTORNEY FOR (Name): Defendant AMBER LAURA HEARD | FOR COURT USE ONLY FILED COURT SERVICES 2019 AUG 23 @ 3:02 JOHN T. FREY CLERK, CIRCUIT COURT FAIRFAX, VA |
| Court for county in which discovery is to be conducted: SUPERIOR COURT OF CALIFORNIA, COUNTY OF STREET ADDRESS: MAILING ADDRESS: CITY, STATE, AND ZIP CODE: BRANCH NAME: | |
| Court in which action is pending: Name of Court: In The Circuit Court of Fairfax County, Virginia STREET ADDRESS: 4110 Chain Bridge Road MAILING ADDRESS: CITY, STATE, AND ZIP CODE: Fairfax, VA 22030-4009 COUNTRY: U.S.A. | |
| PLAINTIFF/PETITIONER: JOHN C. DEPP, II DEFENDANT/RESPONDENT: AMBER LAURA HEARD | CALIFORNIA CASE NUMBER (if any assigned by court): |
| SUBPOENA FOR PRODUCTION OF BUSINESS RECORDS IN ACTION PENDING OUTSIDE CALIFORNIA | CASE NUMBER (of action pending outside California): CL-2019-0002911 |

THE PEOPLE OF THE STATE OF CALIFORNIA, TO (name, address, and telephone number of deponent, if known):
 Walt Disney Pictures, 500 S. Buena Vista Street, Burbank, California 91521-9722; Tel: 818-560-1000

1. YOU ARE ORDERED TO PRODUCE THE BUSINESS RECORDS described in Item 3, as follows:

| | |
|---|-----------------------|
| To (name of deposition officer): First Legal Records Retrieval | At (time): 10:00 a.m. |
| On (date): September 13, 2019 | |
| Location (address): 1511 West Beverly Boulevard, Los Angeles, California 90026 | |
| Do not release the requested records to the deposition officer prior to the date and time stated above. | |

- a. by delivering a true, legible, and durable copy of the business records described in Item 3, enclosed in a sealed inner wrapper with the title and number of the action, name of witness, and date of subpoena clearly written on it. The inner wrapper shall then be enclosed in an outer envelope or wrapper, sealed, and mailed to the deposition officer at the address in Item 1.
- b. by delivering a true, legible, and durable copy of the business records described in Item 3 to the deposition officer at the witness's address, on receipt of payment in cash or by check of the reasonable costs of preparing the copy, as determined under Evidence Code section 1563(b).
- c. by making the original business records described in item 3 available for inspection at your business address by the attorney's representative and permitting copying at your business address under reasonable conditions during normal business hours.
2. The records are to be produced by the date and time shown in item 1 (but not sooner than 20 days after the issuance of the deposition subpoena, or 15 days after service, whichever date is later). Reasonable costs of locating records, making them available or copying them, and postage, if any, are recoverable as set forth in Evidence Code section 1563(b). The records must be accompanied by an affidavit of the custodian or other qualified witness pursuant to Evidence Code section 1561.
3. The records to be produced are described as follows (if electronically stored information is demanded, the form or forms in which each type of information is to be produced may be specified): See Attachment 3
- Continued on Attachment 3 (use form MC-025).
4. Attorneys of record in this action or parties without attorneys are (name, address, telephone number, and name of party represented): See Attachment 4
- Continued on Attachment 4 (use form MC-025).

| | |
|---|--|
| PLAINTIFF/PETITIONER: JOHN C. DEPP, II | CASE NUMBER (of action pending outside California): CL-2019-0002911 |
| DEFENDANT/RESPONDENT: AMBER LAURA HEARD | |

5. If you have been served with this subpoena as a custodian of consumer or employee records under Code of Civil Procedure section 1985.6 and a motion to quash or an objection has been served on you, a court order or agreement of the parties, witnesses, and consumer or employee affected must be obtained before you are required to produce consumer or employee records.

6. Other terms or provisions from out-of-state subpoena, if any (specify):

Continued on Attachment 6 (use form MC-025).

DISOBEDIENCE OF THIS SUBPOENA MAY BE PUNISHED AS CONTEMPT BY THIS COURT. YOU WILL ALSO BE LIABLE FOR THE SUM OF \$500 AND ALL DAMAGES RESULTING FROM YOUR FAILURE TO OBEY.

Date issued: August 21, 2019

Richard A. Schwartz
(TYPE OR PRINT NAME)

[Redacted Signature]
(SIGNATURE OF PERSON ISSUING SUBPOENA)

Attorneys for Defendant AMBER LAURA HEARD
(TITLE)

PROOF OF SERVICE OF SUBPOENA FOR PRODUCTION OF BUSINESS RECORDS

1. I served this Subpoena for Production of Business Records in Action Pending Outside California by personally delivering a copy to the person served as follows:

- a. Person served (name):
- b. Address where served:

c. Date of delivery:

d. Time of delivery:

e. Witness fees and mileage both ways (check one):

- (1) were paid. Amount:..... \$ _____
- (2) were not paid.
- (3) were tendered to the witness's public entity employer as required by Government Code section 68097.2. The amount tendered was (specify): \$ _____

f. Fee for service:..... \$ _____

2. I received this subpoena for service on (date):

3. I also served a completed Proof of Service of Notice to Consumer or Employee and Objection (form SUBP-025) by personally delivering a copy to the person served as described in 1 above.

4. Person serving:

- a. Not a registered California process server
- b. California sheriff or marshal
- c. Registered California process server
- d. Employee or independent contractor of a registered California process server
- e. Exempt from registration under Business and Professions Code section 22350(b)
- f. Registered professional copier
- g. Exempt from registration under Business and Professions Code section 22451
- h. Name, address, telephone number, and, if applicable, county of registration and number:

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

Date:

(For California sheriff or marshal use only)
I certify that the foregoing is true and correct.

Date:

(SIGNATURE)

(SIGNATURE)

Attachment 3

**John C. Depp, II v. Amber Laura Heard
Fairfax County Circuit Court: CL 2019-0002911**

DOCUMENTS TO BE PRODUCED UNDER THIS SUBPOENA

In response to this subpoena, YOU are required to produce the original or an exact copy of the following:

1. Any and all Daily Production Reports from the set of Pirates of the Caribbean: Dead Man Tell No Tales from February 17, 2015 through July 21, 2015.
2. Any and all metadata, including but not limited to, Custodian, eDoc_Author, eDoc_Create_DATE, eDoc_Create_TIME, eDoc_Mod_DATE, and eDoc_Mod_TIME, for Daily Production Reports from the set of Pirates of the Caribbean: Dead Man Tell No Tales from February 17, 2015 through July 21, 2015.
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4. Any and all metadata, including but not limited to, Custodian, eDoc_Author, eDoc_Create_DATE, eDoc_Create_TIME, eDoc_Mod_DATE, and eDoc_Mod_TIME, for Daily Production Reports from the set of Pirates of the Caribbean: Dead Man Tell No Tales from March 24, 2016 through April 13, 2016.

| | |
|---|---------------------------------|
| SHORT TITLE: JOHN C. DEPP, II v. AMBER LAURA HEARD | CASE NUMBER: CL-2019-0002911 |
|---|---------------------------------|

ATTACHMENT (Number): 4

(This Attachment may be used with any Judicial Council form.)

Robert Gilmore (pro hac vice pending)
STEIN MITCHELL BEATO & MISSNER LLP
901 Fifteenth Street, NW, Suite 700
Washington, DC 20005
Tel. (202) 601-1602, or 1589
Fax (202) 296-8312
rgilmore@steinmitchell.com

Counsel for John C. Depp, II

Adam R. Waldman, Esq. (pro hac vice pending)
THE ENDEAVOR LAW FIRM, P.C.
1775 Pennsylvania Avenue, NW, Suite 350
Washington, DC 20006

Counsel for John C. Depp, II

Benjamin G. Chew, Esq. (VSB 29113)
Elliot J. Weingarten (pro hac vice pending)
Andrew C. Crawford (VSB No. 89093)
BROWN RUDNICK LLP
601 Thirteenth Street, NW
Washington, DC 20005
(202) 536-1700
(202) 536-1701 – FAX
bchew@brownrudnick.com

Counsel for John C. Depp, II

Camille M. Vasquez (pro hac vice pending)
BROWN RUDNICK LLP
2211 Michelson Drive
Irvine, CA 92612
Tel. (949) 752-7100
Fax (949) 252-1514
cvasquez@brownrudnick.com

Counsel for John C. Depp, II

Timothy J. McEvoy, Esq. (VSB No. 33277)
Sean Patrick Roche, Esq. (VSB No. 71412)
CAMERON/McEVOY, PLLC
4100 Monument Corner Drive, Suite 420
Fairfax, Virginia 22030
703.460.9343 (Direct)
703.273.8898 (Office)
703.273.8897 (Fax)
tmcevoy@cameronmcevoy.com
sroche@cameronmcevoy.com

Counsel for Amber Laura Heard

Eric M. George, Esq. (SBN 166403)
Richard A. Schwartz (SBN 267469)
BROWNE GEORGE ROSS LLP
2121 Avenue of the Stars, Suite 2800
Los Angeles, CA 90067
Tel. (310) 274-7100
Fax. (310) 275-5697
egeorge@bgrfirm.com
rschwartz@bgrfirm.com

Counsel for Amber Laura Heard

(If the item that this Attachment concerns is made under penalty of perjury, all statements in this Attachment are made under penalty of perjury.)

Page _____ of _____

(Add pages as required)

| | |
|---|---------------------------------|
| SHORT TITLE: JOHN C. DEPP, II v. AMBER LAURA HEARD | CASE NUMBER: CL-2019-0002911 |
|---|---------------------------------|

ATTACHMENT (Number): 6

(This Attachment may be used with any Judicial Council form.)

See attached Fairfax County Circuit Court Subpoena

(If the item that this Attachment concerns is made under penalty of perjury, all statements in this Attachment are made under penalty of perjury.)

Page _____ of _____
(Add pages as required)

SUBPOENA DUCES TECUM (CIVIL) –
ATTORNEY ISSUED VA. CODE §§ 8.01-413, 16.1-89, 16.1-265;
Commonwealth of Virginia Supreme Court Rules 1-4, 4-9

Case No.: CL2019-0002911
9/13/2019 at 10:00 a.m.
HEARING DATE AND TIME

Fairfax County Circuit Court
4110 Chain Bridge Road, Fairfax, Virginia 22030
COURT ADDRESS

John C. Depp, II v./In re: Amber Laura Heard

TO THE PERSON AUTHORIZED BY LAW TO SERVE THIS PROCESS:


You are commanded to summon

Walt Disney Pictures, SERVE: Marsha L. Reed
NAME
500 S. Buena Vista Street
STREET ADDRESS
Burbank California 91521
CITY STATE ZIP

TO the person summoned: You are commanded to make available the documents and tangible things designated and described below:
See Schedule A attached hereto.

First Legal Records Retrieval
at 1511 West Beverly Boulevard, Los Angeles, CA 90026 at 9/13/2019 at 10:00 a.m.
LOCATION DATE AND TIME
to permit such party or someone acting in his or her behalf to inspect and copy, test or sample such tangible things in your possession, custody or control.

This Subpoena Duces Tecum is issued by the attorney for and on behalf of

Defendant Amber Laura Heard
PARTY NAME
Sean Patrick Roche/ Cameron McEvoy, PLLC
NAME OF ATTORNEY 71412
VIRGINIA STATE BAR NUMBER
4100 Monument Corner Drive, Suite 420
OFFICE ADDRESS 703-273-8898
TELEPHONE NUMBER OF ATTORNEY
Fairfax, Virginia 22030
OFFICE ADDRESS 703-273-8897
FACSIMILE NUMBER OF ATTORNEY
August 21, 2019
DATE ISSUED 
SIGNATURE OF ATTORNEY

Notice to Recipient: See page two for further information.

RETURN OF SERVICE (see page two of this form)

TO the person summoned:

If you are served with this subpoena less than 14 days prior to the date that compliance with this subpoena is required, you may object by notifying the party who issued the subpoena of your objection in writing and describing the basis of your objection in that writing.

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TO the person authorized to serve this process: Upon execution, the return of this process shall be made to the clerk of court.

NAME:

ADDRESS:

PERSONAL SERVICE Tel. No.

Being unable to make personal service, a copy was delivered in the following manner:

Delivered to family member (not temporary sojourner or guest) age 16 or older at usual place of abode of party named above after giving information of its purport. List name, age of recipient, and relation of recipient to party named above:

.....

Posted on front door or such other door as appear to be the main entrance of usual place of abode, address listed above. (Other authorized recipient not found.)

NOT FOUND , Sheriff

..... by Deputy Sheriff

DATE

CERTIFICATE OF COUNSEL

I, Sean Patrick Roche, counsel for Defendant, hereby certify

that a copy of the foregoing subpoena duces tecum was emailed
DELIVERY METHOD

to all counsel, counsel of record for Plaintiff,

on the 21st day of August, 2019



SIGNATURE OF ATTORNEY

NOTICE: Upon receipt of the subpoenaed documents, the requesting party must, if requested, provide true and full copies of those documents to any other party or to the attorney for any other party, provided the other party or attorney for the other party pays the reasonable cost of copying or reproducing those documents. This does not apply when the subpoenaed documents are returnable to and maintained by the clerk of the court in which the action is pending. Va. Code § 8.01-417

SCHEDULE A

**John C. Depp, II v. Amber Laura Heard
Fairfax County Circuit Court: CL 2019-0002911**

DOCUMENTS TO BE PRODUCED UNDER THIS SUBPOENA

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FILED
COURT SERVICES

2019 AUG 23 3:02

August 23, 2019
JOHN T. FREY
CLERK, CIRCUIT COURT
FAIRFAX, VA

VIA HAND DELIVERY

Clerk of Court
Fairfax County Circuit Court
4110 Chain Bridge Road
Fairfax, VA 22030

Re: **John C. Depp, II v. Amber Laura Heard**
Fairfax County Circuit Court
Case No. CL2019-0002911

Dear Clerk:

I have enclosed for filing two copies of Defendant's Certificate of Counsel and corresponding subpoenas issued under the Uniform Interstate Depositions and Discovery Acts of Virginia (Va. Code § 8.01-412.8, *et seq.*) and California (Cal. Civ. Proc. Code § 2029.100, *et seq.*) (collectively "Acts"). The subpoenas have been issued in accordance with both Acts and the reciprocal privileges included therein for the issuance and service of the following subpoenas:

1. Amended Subpoena for Production of Business Records in Action Pending Outside California; and Amended Subpoena Duces Tecum (Civil) – Attorney Issued – FilmLA;
2. Amended Subpoena for Production of Business Records in Action Pending Outside California; and Amended Subpoena Duces Tecum (Civil) – Attorney Issued – Jerry Bruckheimer Films; and
3. Amended Subpoena for Production of Business Records in Action Pending Outside California; and Amended Subpoena Duces Tecum (Civil) – Attorney Issued – Walt Disney Pictures.

The enclosed documents will be served by private process server and affidavits of service filed as necessary. Please place the enclosed documents under this case file and return the file-stamped copy of the Certificate to me via the waiting courier.

Thank you in advance for your assistance and please do not hesitate to contact me with any questions or if I can be of any help.

August 23, 2019
Page 2

Very truly yours,

A large black rectangular redaction box covering the signature area.

Sean Patrick Roche

Enclosures (as stated):