

[ ] This SUBPOENA/SUBPOENA DUCES TECUM TO PERSON UNDER FOREIGN SUBPOENA 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: Corporate Designee of Walt Disney Motion Pictures	
ADDRESS: 2710 Gateway Oaks Drive, Suite 150N Group, Inc. Sacramento, CA 95833	
<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 appears to be the main entrance of usual place of abode, address listed above. (Other authorized recipient not found.)	
<input type="checkbox"/> not found	....., Sheriff
.....	by ....., Deputy Sheriff
DATE	

JOHN T. FREY, CLERK  
FAIRFAX COUNTY CIRCUIT COURT  
4110 CHAIN BRIDGE ROAD  
FAIRFAX, VIRGINIA 22030

**SUBPOENA/SUBPOENA DUCES TECUM  
TO PERSON UNDER FOREIGN SUBPOENA**

File No. 2019-002911

Commonwealth of Virginia VA CODE §§ 8.01-412.8—8.01-412.15; Rule 4:9

FAIRFAX COUNTY ..... Circuit Court

4110 Chain Bridge Road, 3rd Floor, Fairfax, VA 22030  
ADDRESS OF COURT

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

Corporate Designee of Walt Disney Motion Pictures Group, Inc.

NAME

2710 Gateway Oaks Drive, Suite 150 N

STREET ADDRESS

Sacramento CA 95833  
CITY STATE ZIP

**TO THE PERSON SUMMONED:** You are commanded to

attend and give testimony at a deposition

produce the books, documents, records, electronically stored information, and tangible things designated and described below

PLEASE SEE ATTACHMENT

FILED  
CIVIL INTAKE  
2021 JAN - 8 AM 11:50  
JOHN C. FREY  
CLERK, CIRCUIT COURT  
FAIRFAX, VA

at Remote Via Zoom Per Judicial Council of California Emergency Rule 11 at February 18, 2021 at 9:00am PST ;  
LOCATION DATE AND TIME

and to permit inspection and copying by the requesting party or someone acting in his or her behalf of the designated items in your possession, custody or control

permit inspection of the premises

at the following location

.....  
LOCATION

on .....  
DATE AND TIME

This subpoena is issued upon the request of the party named below

Defendant Amber Laura Heard  
NAME OF REQUESTING PARTY

c/o Charlson Bredehoft Cohen & Brown, P.C., 11260 Roger Bacon Drive, Suite 201  
STREET ADDRESS

Reston VA 20190 703 318 6800  
CITY STATE ZIP TELEPHONE NUMBER

The requesting party has submitted to this Clerk's Office the foreign subpoena, copy attached, the terms of which are incorporated herein, and the written statement required by Virginia Code § 8.01-412.10.

The names, addresses and telephone numbers of all counsel of record in the proceeding to which the subpoena relates and of parties not represented by counsel are provided [ ] below [ ] on attached list.

January 11<sup>th</sup>, 2021  
DATE ISSUED

JOHN T. FREY, CLERK

by [REDACTED] DEPUTY CLERK

Elaine Charlson Bredehoff for Defendant  
NAME OF ATTORNEY FOR REQUESTING PARTY

23766 VA  
BAR NUMBER LICENSING STATE

11260 Roger Bacon Drive, Suite 201  
OFFICE ADDRESS

703 318 6800  
TELEPHONE NUMBER OF ATTORNEY

Reston, VA 20190  
OFFICE ADDRESS

703 318 6808  
FACSIMILE NUMBER OF ATTORNEY

NAME

BAR NUMBER LICENSING STATE

STREET ADDRESS

TELEPHONE NUMBER

STREET ADDRESS

FACSIMILE NUMBER

NAME

BAR NUMBER LICENSING STATE

STREET ADDRESS

TELEPHONE NUMBER

STREET ADDRESS

FACSIMILE NUMBER

NAME

BAR NUMBER LICENSING STATE

STREET ADDRESS

TELEPHONE NUMBER

STREET ADDRESS

FACSIMILE NUMBER

RETURN OF SERVICE (see page three of this form)

## ATTACHMENT

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

## DEFINITIONS

- a. **Action.** The term "Action" means the above-captioned action.
- b. **And/or.** The use of "and/or" shall be interpreted in every instance both conjunctively and disjunctively in order to bring within the scope of these discovery requests any information which might otherwise be construed to be outside their scope.
- c. **Communication.** The term "communication" means any oral or written exchange of words, thoughts, or ideas to another person, whether person-to-person, in a group, by phone, text (SMS), letter, fax, e-mail, internet post or correspondence, social networking post or correspondence or by any other process, electric, electronic, photographs, video or audio tape recordings, or otherwise. All such Communications are included without regard to the storage or transmission medium (electronically stored information and hard copies are included within this definition).
- d. **Complaint.** The term "Complaint" means the Complaint, dated March 1, 2019, filed in the Action.
- e. **Concerning.** The term "concerning" includes relating to, referring to, describing, evidencing, or constituting.
- f. **Correspondence.** The term "correspondence" means any document(s) and/or communication(s) sent to or received from another entity and/or person.
- g. **Defendant and/or Ms. Heard.** The terms "Defendant" and/or "Ms. Heard" refer to Defendant Amber Laura Heard, including her agents, representatives, employees, assigns, and all persons acting on her behalf.
- h. **Document.** The term "document" is defined in its broadest terms currently recognized. The term shall include, without limitations: any written or other compilation of information (whether printed, handwritten, recorded, or encoded, produced, reproduced, or reproducible by any other process), drafts (revisions or finals), original or preliminary notes, and summaries of other documents, communications of any type (e-mail, text messages, blog posts, social media posts or other similar communications or correspondence), computer tape, computer files, and including all of their contents and attached files. The term "document" shall also include but not be limited to: correspondence, memoranda, contractual documents, specifications, drawings, photographs, audio or video recordings, images, aperture cards, notices of revisions, test reports, inspection reports, evaluations, technical reports, schedules, agreements, reports, studies, analyses, projections, forecasts, summaries, records of conversations or interviews, minutes or records of conferences or meetings, manuals, handbooks, brochures, pamphlets, advertisements, circulars, press releases, financial statements, calendars, diaries, trip reports, etc. A draft of a non-identical copy is a separate document within the meaning of this term.

1. **Engaged.** The term "Engaged," in relation to a person (as defined herein), means contracted, directed, hired, retained, formed an agreement with (whether formal or informal, binding or nonbinding, written or oral), and/or procured the services of, whether or not in exchange for remuneration or other valuable consideration.

j. **Including.** The term "including" means including but not limited to.

k. **Person.** The term "person" is defined as any natural person, business, company, partnership, legal entity, governmental entity, and/or association.

l. **Performance.** The term "Performance," in relation to Mr. Depp, means any creative work in which Mr. Depp or his likeness is, was, will be, may be, or is contemplated to appear, whether or not in exchange for payment or other benefit to Mr. Depp, and includes (without limitation) any appearance (or potential appearance) by Mr. Depp in any film, TV series, product endorsement, advertisement, musical performance, or in-person appearance. To avoid doubt, a Performance includes any creative work in which it was contemplated that Mr. Depp or his likeness would be featured, even if the work was ultimately created without Mr. Depp or his likeness appearing.

m. **Plaintiff and/or Mr. Depp.** The terms "Plaintiff" and/or "Mr. Depp" refer to Plaintiff John C. Depp, II, including his agents, attorneys, security detail, representatives, employees, assigns, and all persons acting on his behalf both individually or as entities.

n. **Requests.** The term "Requests" shall mean the requests for documents to be produced under this Subpoena as set forth in this Attachment.

o. **You and/or Your.** The terms "You" and/or "Your" refer to the recipient of this Subpoena, as well as all persons and entities over which said recipient has "control" as understood by the Rules of this Court.

## INSTRUCTIONS

1. Where information in Your possession is requested, such request includes non-privileged information in the possession of Your agent(s), employee(s), assign(s), representative(s), and all others acting on Your behalf.
2. Whenever appropriate, the singular form of a word shall be interpreted as its plural to whatever extent is necessary to bring within the scope of these Topics any information which might otherwise be construed to be outside their scope.
3. Unless otherwise indicated, these Topics refer to the time, place, and circumstances of the occurrences mentioned or complained of in the pleadings in this case.
4. All references to an entity include the entity and its agents, officers, employees, representatives, subsidiaries, divisions, successors, predecessors, assigns, parents, affiliates, and unless privileged, its attorneys and accountants.
5. If You perceive any ambiguities in a question, instruction, definition, or other aspect of these Topics, set forth the matter deemed ambiguous and the construction used in answering.
6. If You assert a claim of privilege as to any of Your responses to the Topics, state the basis for the asserted privilege, specify the privilege claimed, and include in Your answer sufficient information to permit an informed ruling on the claim of privilege. If the claim relates to a privileged document, state the date, person or persons who prepared or participated in preparing the document, the name and address of any person to whom the document was shown or sent, the general subject matter of the document, the present or last known location and custodian of the original of the document, and the basis for the claim of privilege with respect to the document. If the claim of privilege relates to a communication, state the date(s), place(s) and person(s) involved in the communication, the subject matter of the communication, and the basis for the claim of privilege with respect to that communication.
7. If You perceive any Topic to be overly broad, unduly burdensome, or objectionable for any other reason, respond to the fullest extent possible and clearly note any objection so as to permit an informed ruling on the objection.
8. These Topics are continuing in character so as to require You to promptly amend or supplement Your deposition within a reasonable time if You obtain or become aware of any further or contradictory information.

## **TOPICS FOR CORPORATE DESIGNEE UNDER THIS SUBPOENA**

In response to this subpoena, you are required to produce a designee or designees to testify to the following:

1. All information relating to documents and communications of any nature generated by, relating to, or between The Walt Disney Company (“Disney”) and Mr. Depp (as defined above), respecting any concerns or issues with Mr. Depp during the filming, including shooting and re-shooting, of Pirates of the Caribbean: Dead Men Tell No Tales (“Pirates 5”).
2. All information relating to documents and communications of any nature generated by, relating to, or between Disney and Mr. Depp, respecting any incidents of drug or alcohol use (including suspected drug or alcohol use) by Mr. Depp during the filming, including shooting and re-shooting, of Pirates 5.
3. All information relating to documents and communications of any nature generated by, relating to, or between Disney and Mr. Depp, respecting any delays or tardiness caused by Mr. Depp during the filming, including shooting and re-shooting, of Pirates 5. This includes Mr. Depp arriving late (or not at all) for any scheduled shoots, and the resulting consequences to Disney.
4. All information relating to documents and communications of any nature generated by, relating to, or between Disney and Mr. Depp, respecting any incidents of violence or abuse by Mr. Depp during the filming, including shooting and re-shooting, of Pirates 5.
5. All information relating to documents and communications of any nature generated by, relating to or between Disney and/or Mr. Depp, respecting Mr. Depp’s disagreements with the writers, directors or producers with the filming, editing and/or release of Pirates 5.
6. All information relating to documents and communications of any nature generated by, relating to, or between Disney and Mr. Depp respecting consideration of hiring, casting, including not hiring or casting, Mr. Depp for any further participation or involvement with the Pirates of the Caribbean films or franchise.
7. All information relating to all documents and communications of any nature between Disney and Mr. Depp from January 1, 2018 through the present.

**VIRGINIA:**

**IN THE CIRCUIT COURT OF FAIRFAX COUNTY**

JOHN C. DEPP, II,

Plaintiff,

v.

AMBER LAURA HEARD,

Defendant.

Civil Action No.: CL-2019-0002911

**COUNSEL OF RECORD FOR ALL PARTIES**

<p>Benjamin G. Chew (VSB 29113) Andrew C. Crawford (VSB 89093) BROWN RUDNICK LLP 601 Thirteenth Street, N.W. Washington, D.C. 20005 Telephone: (202) 536-1700 Facsimile: (202) 536-1701 <a href="mailto:bchew@brownrudnick.com">bchew@brownrudnick.com</a> <a href="mailto:acrawford@brownrudnick.com">acrawford@brownrudnick.com</a> <i>Counsel for Plaintiff John C. Depp, II</i></p>	<p>Camille M. Vasquez (admitted <i>pro hac vice</i>) BROWN RUDNICK LLP 2211 Michelson Drive Irvine, CA 92612 Telephone: (949) 752-7100 Facsimile: (949) 252-1514 <a href="mailto:cvasquez@brownrudnick.com">cvasquez@brownrudnick.com</a> <i>Counsel for Plaintiff John C. Depp, II</i></p>
<p>Elaine Charlson Bredehoft (VSB No. 23766) Adam S. Nadelhaft (VSB No. 91717) David E. Murphy (VSB No. 90938) Charlson Bredehoft Cohen &amp; Brown, P.C. 11260 Roger Bacon Drive, Suite 201 Reston, Virginia 20190 Telephone: (703) 318-6800 <a href="mailto:ebredehoft@cbcblaw.com">ebredehoft@cbcblaw.com</a> <a href="mailto:anadelhaft@cbcblaw.com">anadelhaft@cbcblaw.com</a> <a href="mailto:dmurphy@cbcblaw.com">dmurphy@cbcblaw.com</a> <i>Counsel for Defendant Amber Laura Heard</i></p>	<p>J. Benjamin Rottenborn (VSB No. 84796) Joshua R. Treece (VSB No. 79149) WOODS ROGERS PLC 10 S. Jefferson Street, Suite 1400 P.O. Box 14125 Roanoke, Virginia 24011 Telephone: (540) 983-7540 <a href="mailto:brottenborn@woodsrogers.com">brottenborn@woodsrogers.com</a> <a href="mailto:jtreece@woodsrogers.com">jtreece@woodsrogers.com</a> <i>Counsel for Defendant Amber Laura Heard</i></p>



ATTORNEY OR PARTY WITHOUT ATTORNEY (Name, State Bar number, and address): Craig J. Mariam (SBN: 225280); John P. Cogger (SBN: 172808)  Gordon Rees Scully Mansukhani, LLP 633 West Fifth Street, 52 <sup>nd</sup> Floor Los Angeles, CA 90071 TELEPHONE NO.: 213-576-5000 FAX NO. (Optional): 877-306-0043 E-MAIL ADDRESS (Optional): cmariam@grsm.com; jcogger@grsm.com ATTORNEY FOR (Name): Amber Laura Heard	FOR COURT USE ONLY
Court for county in which discovery is to be conducted: <b>SUPERIOR COURT OF CALIFORNIA, COUNTY OF Los Angeles</b> STREET ADDRESS: 111 N. Hill Street MAILING ADDRESS: 111 N. Hill Street CITY AND ZIP CODE: Los Angeles, 90012 BRANCH NAME: Stanley Mosk Courthouse	
Court in which action is pending: <b>Name of Court:</b> Circuit Court of Fairfax County STREET ADDRESS: 4110 Chain Bridge Road MAILING ADDRESS: 4110 Chain Bridge Road CITY, STATE, AND ZIP CODE: Fairfax, VA 22030 COUNTRY: United States	
PLAINTIFF/PETITIONER: John C. Depp, II DEFENDANT/RESPONDENT: Amber Laura Heard	CALIFORNIA CASE NUMBER (if any assigned by court): 19STCP04763
<b>DEPOSITION SUBPOENA FOR PERSONAL APPEARANCE          IN ACTION PENDING OUTSIDE CALIFORNIA</b>	CASE NUMBER (of action pending outside California): CL-2019-002911

THE PEOPLE OF THE STATE OF CALIFORNIA, TO (name, address, and telephone number of deponent, if known):  
 Person Most Knowledgeable of Walt Disney Motion Pictures Group, Inc., 2710 Gateway Oaks Drive, Ste. 150N,  
 Sacramento, CA 95833

1. YOU ARE ORDERED TO APPEAR IN PERSON TO TESTIFY AS A WITNESS in the action specified above at the following date, time, and place:

Date: February 18, 2021	Time: 9:00 a.m. (PDT)	Address: Remote Via Zoom per Judicial Council CA Emergency Rule 11
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- a.  As a deponent who is not a natural person, you are ordered to designate one or more persons to testify on your behalf as to the matters described in item 2. (Code Civ. Proc., § 2025.230.)
- b. This deposition will be recorded stenographically  through the instant visual display of testimony and by  audiotape  videotape.
2.  If the witness is a representative of a business or other entity, the matters upon which the witness is to be examined are as follows:  
 See Attachment 2

Continued on Attachment 2 (use form MC-025).

3. Attorneys of record in this action or parties without attorneys are (name, address, telephone number, and name of party represented):  
 See Attachment 3

Continued on Attachment 3 (use form MC-025).

PLAINTIFF/PETITIONER: John C. Depp, II	CASE NUMBER (of action pending outside California): CL-2019-002911
DEFENDANT/RESPONDENT: Amber Laura Heard	

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

Continued on Attachment 4 (use form MC-025).

5. At the deposition, you will be asked questions under oath. Questions and answers are recorded stenographically at the deposition; later they are transcribed for possible use at trial. You may read the written record and change any incorrect answers before you sign the deposition. You are entitled to receive witness fees and mileage actually traveled both ways. The money must be paid, at the option of the party giving notice of the deposition, either with service of this subpoena or at the time of the deposition. Unless the court orders or you agree otherwise, if you are being deposed as an individual, the deposition must take place within 75 miles of your residence. The location of the deposition for all deponents is governed by Code of Civil Procedure section 2025.250.

**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: January 8, 2021

Craig J. Mariam

(TYPE OR PRINT NAME)



(SIGNATURE OF PERSON ISSUING SUBPOENA)

Attorney for Amber Laura Heard

(TITLE)

**PROOF OF SERVICE OF DEPOSITION SUBPOENA FOR PERSONAL APPEARANCE**

1. I served this *Deposition Subpoena for Personal Appearance in Action Pending Outside California* by personally delivering a copy to the person served as follows:

- a. Person served
- 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. 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. 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.

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

Date:

Date:





(SIGNATURE)

(SIGNATURE)

SHORT TITLE: John C. Depp, II v. Amber Laura Heard	CASE NUMBER: CL-2019-0002911 .
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ATTACHMENT (Number): 2

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

DEFINITIONS, INSTRUCTIONS, AND TOPICS

*(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)*

## ATTACHMENT

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

### DEFINITIONS

- a. **Action.** The term "Action" means the above-captioned action.
- b. **And/or.** The use of "and/or" shall be interpreted in every instance both conjunctively and disjunctively in order to bring within the scope of these discovery requests any information which might otherwise be construed to be outside their scope.
- c. **Communication.** The term "communication" means any oral or written exchange of words, thoughts, or ideas to another person, whether person-to-person, in a group, by phone, text (SMS), letter, fax, e-mail, internet post or correspondence, social networking post or correspondence or by any other process, electric, electronic, photographs, video or audio tape recordings, or otherwise. All such Communications are included without regard to the storage or transmission medium (electronically stored information and hard copies are included within this definition).
- d. **Complaint.** The term "Complaint" means the Complaint, dated March 1, 2019, filed in the Action.
- e. **Concerning.** The term "concerning" includes relating to, referring to, describing, evidencing, or constituting.
- f. **Correspondence.** The term "correspondence" means any document(s) and/or communication(s) sent to or received from another entity and/or person.
- g. **Defendant and/or Ms. Heard.** The terms "Defendant" and/or "Ms. Heard" refer to Defendant Amber Laura Heard, including her agents, representatives, employees, assigns, and all persons acting on her behalf.
- h. **Document.** The term "document" is defined in its broadest terms currently recognized. The term shall include, without limitations: any written or other compilation of information (whether printed, handwritten, recorded, or encoded, produced, reproduced, or reproducible by any other process), drafts (revisions or finals), original or preliminary notes, and summaries of other documents, communications of any type (e-mail, text messages, blog posts, social media posts or other similar communications or correspondence), computer tape, computer files, and including all of their contents and attached files. The term "document" shall also include but not be limited to: correspondence, memoranda, contractual documents, specifications, drawings, photographs, audio or video recordings, images, aperture cards, notices of revisions, test reports, inspection reports, evaluations, technical reports, schedules, agreements, reports, studies, analyses, projections, forecasts, summaries, records of conversations or interviews, minutes or records of conferences or meetings, manuals, handbooks, brochures, pamphlets, advertisements, circulars, press releases, financial statements, calendars, diaries, trip reports, etc. A draft of a non-identical copy is a separate document within the meaning of this term.

1. **Engaged.** The term "Engaged," in relation to a person (as defined herein), means contracted, directed, hired, retained, formed an agreement with (whether formal or informal, binding or nonbinding, written or oral), and/or procured the services of, whether or not in exchange for remuneration or other valuable consideration.

j. **Including.** The term "including" means including but not limited to.

k. **Person.** The term "person" is defined as any natural person, business, company, partnership, legal entity, governmental entity, and/or association.

l. **Performance.** The term "Performance," in relation to Mr. Depp, means any creative work in which Mr. Depp or his likeness is, was, will be, may be, or is contemplated to appear, whether or not in exchange for payment or other benefit to Mr. Depp, and includes (without limitation) any appearance (or potential appearance) by Mr. Depp in any film, TV series, product endorsement, advertisement, musical performance, or in-person appearance. To avoid doubt, a Performance includes any creative work in which it was contemplated that Mr. Depp or his likeness would be featured, even if the work was ultimately created without Mr. Depp or his likeness appearing.

m. **Plaintiff and/or Mr. Depp.** The terms "Plaintiff" and/or "Mr. Depp" refer to Plaintiff John C. Depp, II, including his agents, attorneys, security detail, representatives, employees, assigns, and all persons acting on his behalf both individually or as entities.

n. **Requests.** The term "Requests" shall mean the requests for documents to be produced under this Subpoena as set forth in this Attachment.

o. **You and/or Your.** The terms "You" and/or "Your" refer to the recipient of this Subpoena, as well as all persons and entities over which said recipient has "control" as understood by the Rules of this Court.

## INSTRUCTIONS

1. Where information in Your possession is requested, such request includes non- privileged information in the possession of Your agent(s), employee(s), assign(s), representative(s), and all others acting on Your behalf.
2. Whenever appropriate, the singular form of a word shall be interpreted as its plural to whatever extent is necessary to bring within the scope of these Topics any information which might otherwise be construed to be outside their scope.
3. Unless otherwise indicated, these Topics refer to the time, place, and circumstances of the occurrences mentioned or complained of in the pleadings in this case.
4. All references to an entity include the entity and its agents, officers, employees, representatives, subsidiaries, divisions, successors, predecessors, assigns, parents, affiliates, and unless privileged, its attorneys and accountants.
5. If You perceive any ambiguities in a question, instruction, definition, or other aspect of these Topics, set forth the matter deemed ambiguous and the construction used in answering.
6. If You assert a claim of privilege as to any of Your responses to the Topics, state the basis for the asserted privilege, specify the privilege claimed, and include in Your answer sufficient information to permit an informed ruling on the claim of privilege. If the claim relates to a privileged document, state the date, person or persons who prepared or participated in preparing the document, the name and address of any person to whom the document was shown or sent, the general subject matter of the document, the present or last known location and custodian of the original of the document, and the basis for the claim of privilege with respect to the document. If the claim of privilege relates to a communication, state the date(s), place(s) and person(s) involved in the communication, the subject matter of the communication, and the basis for the claim of privilege with respect to that communication.
7. If You perceive any Topic to be overly broad, unduly burdensome, or objectionable for any other reason, respond to the fullest extent possible and clearly note any objection so as to permit an informed ruling on the objection.
8. These Topics are continuing in character so as to require You to promptly amend or supplement Your deposition within a reasonable time if You obtain or become aware of any further or contradictory information.

## **TOPICS FOR CORPORATE DESIGNEE UNDER THIS SUBPOENA**

In response to this subpoena, you are required to produce a designee or designees to testify to the following:

1. All information relating to documents and communications of any nature generated by, relating to, or between The Walt Disney Company (“Disney”) and Mr. Depp (as defined above), respecting any concerns or issues with Mr. Depp during the filming, including shooting and re-shooting, of Pirates of the Caribbean: Dead Men Tell No Tales (“Pirates 5”).
2. All information relating to documents and communications of any nature generated by, relating to, or between Disney and Mr. Depp, respecting any incidents of drug or alcohol use (including suspected drug or alcohol use) by Mr. Depp during the filming, including shooting and re-shooting, of Pirates 5.
3. All information relating to documents and communications of any nature generated by, relating to, or between Disney and Mr. Depp, respecting any delays or tardiness caused by Mr. Depp during the filming, including shooting and re-shooting, of Pirates 5. This includes Mr. Depp arriving late (or not at all) for any scheduled shoots, and the resulting consequences to Disney.
4. All information relating to documents and communications of any nature generated by, relating to, or between Disney and Mr. Depp, respecting any incidents of violence or abuse by Mr. Depp during the filming, including shooting and re-shooting, of Pirates 5.
5. All information relating to documents and communications of any nature generated by, relating to or between Disney and/or Mr. Depp, respecting Mr. Depp’s disagreements with the writers, directors or producers with the filming, editing and/or release of Pirates 5.
6. All information relating to documents and communications of any nature generated by, relating to, or between Disney and Mr. Depp respecting consideration of hiring, casting, including not hiring or casting, Mr. Depp for any further participation or involvement with the Pirates of the Caribbean films or franchise.
7. All information relating to all documents and communications of any nature between Disney and Mr. Depp from January 1, 2018 through the present.

SHORT TITLE: Depp v. Heard	CASE NUMBER: CL-2019-0002911 .
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ATTACHMENT (Number): 3

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

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

(Add pages as required)

1070666/24080402



**SERVICE LIST**

*John C. Depp II v. Amber Heard*  
Case No.: CL-2019-0002911 .

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SHORT TITLE: Depp v. Heard	CASE NUMBER: CL-2019-0002911 .
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ATTACHMENT (Number): 4

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

Due to the ongoing COVID-19 pandemic, the deposition will be taken by audio-video conference, via a link to be provided, pursuant to Code of Civil Procedure §§ 2025.220 and 2025.330. If requested, the deponent need not be physically present with the deposition officer at the time of the deposition. (Judicial Council of California Emergency Rule 11 [April 6, 2020].) Counsel for all parties and their clients will be able to participate from various separate locations. This deposition will be taken before a certified shorthand reporter who is authorized to administer an oath in accordance with the provisions of California Code of Civil Procedure § 2025.010, et seq.

The deposition may also be videotaped and audiotaped for use as evidence in this action, at trial, or for such other purposes as are permitted, as authorized by Code of Civil Procedure § 2025.340 and any applicable Virginia law.

The deposition testimony may also be recorded through Summation, an instant visual display of the testimony, of which a rough draft of the testimony will be requested, as authorized by Code of Civil Procedure § 2025.340. If the deposition is not completed on the date set forth above, the taking of the deposition will be continued from day to day thereafter, except for Saturdays, Sundays and holidays, until completed.

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

Page 2 of 3

Attachment are made under penalty of perjury.)

*(Add pages as required)*

**VIRGINIA:**

**IN THE CIRCUIT COURT OF FAIRFAX COUNTY**

JOHN C. DEPP, II,

Plaintiff and Counter-defendant,

v.

AMBER LAURA HEARD,

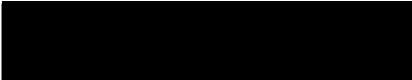
Defendant and Counter-plaintiff.

Civil Action No.: CL-2019-0002911

**CERTIFICATE OF COUNSEL**

This is to certify that I caused a true and accurate copy of the enclosed Deposition Subpoena for Personal Appearance in Action Pending Outside California to be sent by email this 8<sup>th</sup> day of January, 2021.

January 8, 2021

  
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*Counsel to Defendant/Counterclaim  
Plaintiff Amber Laura Heard*

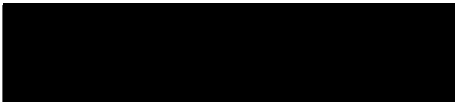
**CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of the foregoing was served this 8<sup>th</sup> Day of January, by email, by agreement of the parties, addressed as follows:

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ALSO ADMITTED IN D.C.  
◻ ALSO ADMITTED IN MARYLAND  
◊ ALSO ADMITTED IN MASSACHUSETTS  
% ALSO ADMITTED IN NEW YORK  
◻ ALSO ADMITTED IN WISCONSIN  
• ONLY ADMITTED IN MARYLAND

January 8, 2021

**BY MESSENGER**

John T. Frey, Clerk  
Fairfax County Circuit Court  
4110 Chain Bridge Road, 3rd Floor  
Fairfax, VA 22030

FILED  
CIVIL INTAKE  
2021 JAN - 8 AM 11:47  
JOHN T. FREY  
CLERK, CIRCUIT COURT  
FAIRFAX, VA

Re: *Case No. CL-2019-0002911 – John C. Depp, II v. Amber Laura Heard*

Dear Mr. Frey:

Enclosed for filing in the above referenced matter, please find four copies of Defendant's Certificate of Counsel and corresponding subpoena issued pursuant to Virginia Code Section 8.01-412.10, and California Civil Procedure Code Section 2029.100 (collectively, "Acts"). The enclosed Subpoenas Duces Tecum to Person Under Foreign Subpoena have been issued in accordance with both Acts and the reciprocal privileges included therein.

The enclosed document will be served by private process server, and affidavit of service will be filed as necessary. Please return a file stamped copy of the same via the awaiting messenger.

Please also find a check in the amount of \$28, made payable to the Clerk, Fairfax Circuit Court, for the filing fee.

Thank you very much for your assistance.

Very truly yours

  
Elaine Charlson Bredehoff

Enclosures