VIRGINIA:

IN THE CIRCUIT COURT OF FAIRFAX COUNTY

JOHN C. DEPP, II

    Plaintiff,

v.

                                           Civil Action No.: CL-2019-0002911

AMBER LAURA HEARD

    Defendant.

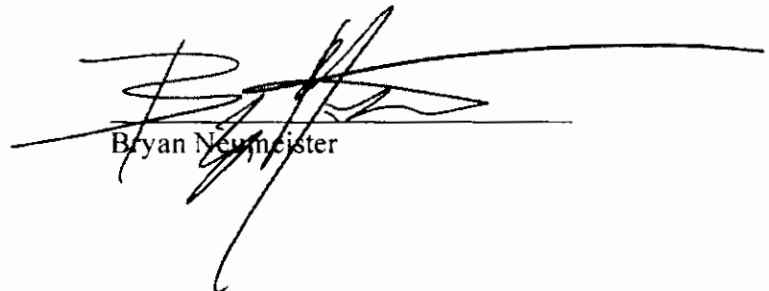## DECLARATION OF BRYAN NEUMEISTER

1.   My name is Bryan Neumeister.

2.   I am a court certified video, audio, and digital photographic forensics and technical expert and the CEO of USA Forensic LLC.

3.   I have been retained by Mr. Depp in this matter.

4.   I have extensive experience collecting, analyzing, and producing electronically stored information ("ESI") in law enforcement and legal proceedings, including approximately 600 cases in the last four years alone. I have over 41 years of audio/video professional experience, and twenty years of experience testifying and consulting for federal and state governments, agencies, prosecutors, defense attorneys, Fortune 500 companies, and individuals in a variety of aspects concerning analysis of photographs, audio and visual recordings, phone and text messages, and other digital data.

5.   This declaration is based on my personal knowledge.

6.   The Court-ordered deadline for completion of the forensic imaging was November 30, 2021.

7.   To date, some forensic imaging of Ms. Heard's devices has occurred, but no photographs have been produced to me for my review.

8.   On or about February 11, 2022, my colleague Matt Erickson received a communication from Tyler Swasy, one of Ms. Heard's experts' colleagues, in which Mr. Swasy stated that there are still 8 or 10 forensic images of backup files from Ms. Heard's iCloud that need to be parsed. Analyzing this data is a time-consuming process, and the delay has already rendered it extremely difficult to complete that analysis before trial. Further delay will further increase the difficulty of doing so.

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

Exceted on this 18th day of February, 2022

Bryan Neumeister