

VIRGINIA:

IN THE CIRCUIT COURT OF FAIRFAX COUNTY

JOHN C. DEPP, II

Plaintiff,

v.

AMBER LAURA HEARD

Defendant.

Civil Action No.: CL-2019-0002911

DECLARATION OF JOELLE RICH

1. My name is Joelle Rich.
2. I am a Partner based in the London office of the law firm Schillings.
3. I represented Mr. Depp in the UK action titled *Depp v. News Group Newspapers Ltd.* (the "UK Action").
4. At the request of Mr. Depp's U.S. counsel, Brown Rudnick, I have reviewed the following six audio recordings produced by Mr. Depp in the Virginia Action: DEPP9046, 9047, 8259, 8260, 8297, and 8298.
5. Based on my review, I have confirmed (a) that each of the six audio recordings were previously reviewed and produced by Schillings in the UK Action; (b) that Schillings did not alter, edit, manipulate, or otherwise change the recordings in any way prior to producing them in the UK Action; and (c) that the recordings produced in the Virginia Action i.e., DEPP9046, 9047, 8259, 8260, 8297, and 8298 are the exact same length and content as the following six recordings produced in the UK Action: Trial Bundle references L138a, L138b, F154, F155, M140, and M141, respectively. They do not therefore appear to have been altered, edited, manipulated, or otherwise differ in any way from those produced in the UK Action.

6. Each of the recordings were produced to Brown Rudnick as part of the UK Trial Bundles, which we understand were required to be produced in the Virginia Action.

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

Executed on this 19th day of January, 2022

A handwritten signature in black ink, appearing to read 'Joelle Rich', written in a cursive style.

Joelle Rich