

VIRGINIA:

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IN THE CIRCUIT COURT OF FAIRFAX COUNTY

JOHN T. FREY
CLERK, CIRCUIT COURT
FAIRFAX, VA

JOHN C. DEPP, II,
Plaintiff and Counterclaim-Defendant,

v.

AMBER LAURA HEARD,
Defendant and Counterclaim-Plaintiff.

Civil Action No.: CL-2019-0002911

**DEFENDANT AND COUNTERCLAIM-PLAINTIFF AMBER LAURA HEARD'S
MEMORANDUM IN SUPPORT OF MOTION TO COMPEL RESPONSES
TO ELEVENTH AND TWELFTH REQUESTS FOR PRODUCTION OF DOCUMENTS
TO PLAINTIFF AND COUNTERCLAIM-DEFENDANT JOHN C. DEPP, II**

Elaine Charlson Bredehoff (VSB No. 23766)
Adam S. Nadelhaft (VSB No. 91717)
Clarissa K. Pintado (VSB 86882)
David E. Murphy (VSB No. 90938)
Charlson Bredehoff Cohen & Brown, P.C.
11260 Roger Bacon Drive, Suite 201
Reston, Virginia 20190
Telephone: (703) 318-6800

J. Benjamin Rottenborn (VSB #84796)
Joshua R. Treece (VSB #79149)
WOODS ROGERS PLC
10 S. Jefferson Street, Suite 1400
P.O. Box 14125
Roanoke, Virginia 24011
(540) 983-7540

*Counsel to Defendant and Counterclaim-
Plaintiff Amber Laura Heard*

Ms. Heard's Motion to Compel discovery from her 11th and 12th RFPs (**Atts. 1-2**) seeks basic discovery that should have been produced long ago. This includes contracts and communications respecting Mr. Depp's professional projects, because he claims Ms. Heard destroyed his career. Ms. Heard has a right to discover alternative causalities including Mr. Depp's own actions and other sources of the findings of domestic violence. Ms. Heard also seeks documents sufficient to demonstrate Mr. Depp's charitable donations. As this Court knows, Mr. Depp has sought discovery into Ms. Heard's charitable donations, and seeks to contrast his donations to Ms. Heard's. While Mr. Depp claims his donations are not relevant, he refuses to agree he will not testify at trial to his alleged charitable giving, revealing that this information is quite relevant and discoverable. Finally, Ms. Heard seeks discovery related to Mr. Depp's Affirmative Defenses, denials to the Counterclaim, and support for his Interrogatory and Request for Admission Responses – basic discovery sought in every case, and which Mr. Depp should be Ordered to produce now.

ARGUMENT

I. Documents Related to Mr. Depp's Film and Commercial Opportunities

Ms. Heard requested Mr. Depp's contracts, agreements, and compensation documents for his recent films, any potential films made by Disney, and the marketing campaign for Christian Dior/Sauvage. **Att. 1**, RFPs 1-14, **Att. 2**, RFP 1. These same narrowed Requests also seek communications reflecting any "complaints, concerns, [and] termination" of Mr. Depp for these projects. *Id.* Mr. Depp only agreed to produce documents sufficient to show compensation.¹

These Requests are directly relevant to Mr. Depp's Complaint, as well as his damages.

¹ During the meet and confers, Mr. Depp claimed he had produced all his contracts for these films, but Ms. Heard is unable to locate, for example, produced contracts for Pirates of the Caribbean 2 or 3, the Fantastic Beasts Films, Murder on the Orient Express, City of Lies, The Professor, Beetlejuice 2, or Puffins. **Att. 1**, RFPs 1, 7-10, 13, 14.

Mr. Depp's former agent, Tracey Jacobs, testified that in the years before the Op-Ed was published, she had increasing difficulty in finding and sustaining work for Mr. Depp because of his reputation for significant tardiness, no shows and unavailability, rampant drug and alcohol abuse, intoxicated while on set, and appearing in a televised event while heavily intoxicated and on drugs. **Att. 6; Att. 7.** Ms. Jacobs testified it "makes it more and more difficult to procure employment and high earnings," and that "there was no love between Johnny and Disney." **Att. 6,** 169:15-19, 198:4-5. Mr. Depp also claimed that the Sun article forming the basis of the UK Litigation was "reputation-destroying" and "career-ending," yet another alternate cause of Mr. Depp's alleged damages. **Att. 4,** at 2503:18-21. Ms. Heard has a right to fully explore alternative reasons for damage to Mr. Depp's reputation and his failure to mitigate his damages, Ms. Heard's Sixth and Seventh Defenses to the Complaint. **Att. 3,** at 29. This discovery should be ordered, as the Court did for Mr. Depp, who argued that he "is entitled to explore...whether Ms. Heard's claimed damages are attributable" to other alternate causes. **Att. 5,** at 2, 4.

II. Documents Related to Mr. Depp's Defenses to and Denials in the Counterclaim

Mr. Depp plead thirteen Defenses to Ms. Heard's Counterclaim, so Ms. Heard served specific Requests seeking documents supporting or relating to these defenses: 2nd Defense- Ms. Heard has not suffered damages (RFP 20); 3rd Defense- the defamatory statements are true and not defamatory (RFP 21); 6th Defense- unclean hands (RFP 24); 7th Defense- laches (RFP 25); 8th Defense- equitable estoppel (RFP 26); 9th Defense- failure to join a necessary or indispensable party (RFP 27); 10th Defense- Ms. Heard is a public figure and the statements were not made with malice (RFP 28); 11th Defense- the statements are opinion and protected speech (RFP 29); and 12th Defense- Ms. Heard failed to mitigate her damages (RFP 30). **Att. 1; Att. 8,** at 25-27. Mr. Depp asserted every possible boilerplate objection, and only agreed to produce documents "subject to" them, leaving Ms. Heard unaware of the scope of withheld

documents. There is nothing objectionable about seeking documents related to Mr. Depp's own pleaded defenses. *Prince William Cnty. Sch. Bd. v. Bd. of Supervisors*, 2007 Va. Cir. LEXIS 1792, at *3 (Prince William 2007) (compelling "documents supporting the defenses...set forth in the Defendants' Answer").

These Requests further include documents supporting or related to Mr. Depp's Fourth Defense that Mr. Depp did not make the defamatory statements (RFP 22), Fifth Defense that there was a lack of direction or control over Mr. Waldman, who exceeded the scope of his agency relationship with Mr. Depp (RFP 23), and his Thirteenth Defense including "reserving" the right to later assert "the matters set forth in the Fifth Affirmative Defense" (RFP 31). **Att. 1; Att. 8**, at 25-27. For these defenses, Mr. Depp only agreed to produce documents subject to his attorney-client privilege and work product objections, "and will not produce documents covered by those privileges in response to this Request." **Att. 1**, RFPs 22-23, 31. Mr. Depp's objections are prohibited because he is attempting to use the privilege as both a sword and a shield. *Walton v. Mid-Atlantic Spine Specialists, P.C.*, 280 Va. 113, 130 (2010) ("parties should not be permitted to use the privilege as both a shield, preventing the admission of evidence, and as a sword to mislead the finder of fact by allowing evidence that would be impeached by the privileged information if it had not been suppressed"). Mr. Depp cannot claim that Mr. Waldman did not have authority to make the statements at issue, then assert privilege and not produce documents, especially where Mr. Depp has argued "although Ms. Heard alleges the purportedly defamatory statements were made 'by Mr. Depp, thought (sic) his attorney,' ***this is a hotly disputed fact which would still need to be litigated.***" **Att. 9** (emphasis added).

Ms. Heard requested that Mr. Depp either withdraw these defenses, or agree to produce all supporting documents, but Mr. Depp refused. Mr. Depp cannot have it both ways - he must

produce all documents related to these defenses *now*, or must withdraw them.

Finally, Ms. Heard served very specific Requests for documents supporting Mr. Depp's denials or partial denials of the Counterclaim, but Mr. Depp served his typical extensive boilerplate objections (RFPs. 34-88), and refused to produce any responsive documents for RFPs 37, 39-68, 74-75, 77, 81, and 83-88. **Att. 1.**

III. Documents Identifying Mr. Depp's Charitable Donations

Ms. Heard requested documents sufficient to reflect Mr. Depp's charitable donations from 2010 to the present. **Att. 2**, RFP 9. Mr. Depp has demonstrated obsession with Ms. Heard's pledges of charitable donations (although we continue to assert relevance objections), including with this Court and extensive third-party discovery. Mr. Depp's counsel has repeatedly publicly accused Ms. Heard of depriving "sick children with cancer" of charitable donations. **Att. 10**, at 8:4-10. Mr. Depp has also claimed he donated \$200,000 of the \$7 million divorce settlement to the ACLU and the Children's Hospital, thus putting his donations to those entities at issue to clear up whether these are properly credited to Mr. Depp, or to Ms. Heard.

During the meet and confers, Ms. Heard suggested compromise by limiting these requests to Mr. Depp's charitable donations to the ACLU and Children's Hospital, along with Mr. Depp agreeing he would not testify at trial whether he donated anywhere else. Mr. Depp refused to agree to this compromise, including refusing to even agree Mr. Depp would not testify at trial to the very discovery he claims is irrelevant. Mr. Depp cannot have it both ways.

IV. Documents Supporting Responses to Interrogatories and Requests for Admissions

Like litigants in virtually every case, Ms. Heard requested documents supporting Mr. Depp's interrogatory responses. Ms. Heard agreed to narrow these Requests to very specific Interrogatories. **Att. 2**, RFP 7; **Atts 11-12**. For Int. Nos. 9-10, Mr. Depp represented he would identify all documents by BATES number, but never did so, and should now be compelled to do

so and produce the documents. **Att. 11.** For Int. No. 11, Mr. Depp stated in his supplemental response that he may have consumed alcohol, medications, or drugs on the dates Ms. Heard claims he abused her, and denies he was bingeing on drugs. **Att. 12.** Documents supporting this response should be produced. For Int. No. 14, Mr. Depp responded with a description of the Rocky Brooks case – where Mr. Depp is accused of punching Mr. Brooks in the face on set in 2016. He should produce those documents. **Atts. 11-12.** For Int. No. 16, Mr. Depp identified information about his alleged damages, and should produce documents supporting this response. **Att. 12.** For Int. No. 13, Mr. Depp never produced the fully executed Separation Agreement between he and Vanessa Paradis, which was previously ordered. **Att. 11.** Finally, for Int. No. 17, Mr. Depp identified two other lawsuits he referred to as a “Jane Doe” lawsuit and “Buckley LLP” lawsuit, and he should produce all documents for these lawsuits within the scope of the Court’s August 19, 2021 Order on the “Other Litigations.” *Id.*; **Att. 13.**

Ms. Heard also served a similar Request seeking documents supporting Mr. Depp’s responses to her 2nd Interrogatories. **Att. 2, RFP 8; Atts. 14-15.** For Int. Nos. 1-2, Mr. Depp represented he would identify responsive documents by BATES number, but never did so, and should now be compelled to do so and produce the documents. **Att. 15.** For Int. No. 3, Mr. Depp identified specific factual information supporting his denials of Ms. Heard’s 1st RFAs, and should be compelled to produce all supporting documents. **Att. 14; Atts. 16-17.**

Finally, Ms. Heard served RFPs seeking Mr. Depp’s responses to her 1st, 4th, and 5th RFAs, and all responsive documents should be produced. **Att. 2, RFPs 2, 5-6; Atts. 18-19.**

CONCLUSION

These are all reasonable and ordinary discovery requests necessary to prepare for trial. Ms. Heard’s Motion to Compel should be granted.

November 24, 2021

Respectfully submitted,



Elaine Charlson Bredehoft (VSB #23766)
Adam S. Nadelhaft (VSB #91717)
Clarissa K. Pintado (VSB 86882)
David E. Murphy (VSB #90938)
CHARLSON BREDEHOFT COHEN & BROWN, P.C.
11260 Roger Bacon Drive, Suite 201
Reston, VA 20190
(703) 318-6800
ebredehoft@cbcblaw.com
anadelhaft@cbcblaw.com
cpintado@cbcblaw.com
dmurphy@cbcblaw.com

J. Benjamin Rottenborn (VSB #84796)
Joshua R. Treece (VSB #79149)
WOODS ROGERS PLC
10 S. Jefferson Street, Suite 1400
P.O. Box 14125
Roanoke, Virginia 24011
(540) 983-7540
brottenborn@woodsrogers.com
jtreece@woodsrogers.com

*Counsel to Defendant and Counterclaim-Plaintiff,
Amber Laura Heard*

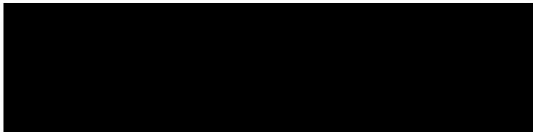
CERTIFICATE OF SERVICE

I certify that on this 24th day of November, 2021, a copy of the foregoing was served by email, by agreement of the parties, addressed as follows:

Benjamin G. Chew, Esq.
Andrew C. Crawford, Esq.
BROWN RUDNICK LLP
601 Thirteenth Street, N.W.
Washington, D.C. 20005
Telephone: (202) 536-1700
Facsimile: (202) 536-1701
bchew@brownrudnick.com
acrawford@brownrudnick.com

Camille M. Vasquez, Esq.
BROWN RUDNICK LLP
2211 Michelson Drive
Irvine, CA 92612
Telephone: (949) 752-7100
Facsimile: (949) 252-1514
cvasquez@brownrudnick.com

*Counsel for Plaintiff and Counterclaim-Defendant,
John C. Depp, II*



David E. Murphy



VIRGINIA:

IN THE CIRCUIT COURT OF FAIRFAX COUNTY, VIRGINIA

JOHN C. DEPP, II

Plaintiff,

v.

AMBER LAURA HEARD,

Defendant.

Civil Action No.: CL-2019-0002911

**PLAINTIFF JOHN C. DEPP, II'S RESPONSES AND OBJECTIONS TO DEFENDANT
AMBER LAURA HEARD'S ELEVENTH REQUEST FOR PRODUCTION**

Pursuant to Rule 4:9 of the Rules of the Supreme Court of Virginia, Plaintiff John C. Depp, II ("Plaintiff" and/or "Mr. Depp"), by and through his undersigned counsel, hereby responds and objects to Defendant Amber Laura Heard's ("Defendant" and/or "Ms. Heard") Eleventh Set of Requests for Production of Documents (each, a "Request" and collectively, the "Requests"), dated January 26, 2021 and served in the above captioned action ("Action") as follows:

GENERAL OBJECTIONS

1. These General Objections are incorporated into each specific response to the numbered Requests below as if fully repeated therein and are intended, and shall be deemed, to be in addition to any specific objection included in any response below. The assertion of the same, similar, or additional objections or partial responses to the individual Requests does not waive any of Plaintiff's General Objections. Failure to make a specific reference to any General Objection is not a waiver of any General Objection.

RESPONSE: No objection.

n. *Pirates of the Caribbean Films.* The phrase “Pirates of the Caribbean Films” collectively refers to the films “Pirates of the Caribbean: The Curse of the Black Pearl,” “Pirates of the Caribbean: Dead Man’s Chest,” “Pirates of the Caribbean: At World’s End,” “Pirates of the Caribbean: On Stranger Tides,” and “Pirates of the Caribbean: Dead Men Tell No Tales.”

RESPONSE: Plaintiff objects to this definition on the basis that it is overly broad and unduly burdensome and implicates significant privacy, privilege, and other interests of Plaintiff and third parties. Plaintiff further objects to this definition as vague and ambiguous.

o. *Fantastic Beasts Films.* The phrase “Fantastic Beasts Films” collectively refers to the films “Fantastic Beasts and Where to Find Them,” “Fantastic Beasts: The Crimes of Grindelwald,” and the tentatively titled “Fantastic Beasts and Where to Find Them 3,” along with any other future film in this series referred to in any contract such as Fantastic Beasts and Where to Find Them 4 and Fantastic Beasts and Where to Find Them 5.

RESPONSE: Plaintiff objects to this definition on the basis that it is overly broad and unduly burdensome and implicates significant privacy, privilege, and other interests of Plaintiff and third parties. Plaintiff further objects to this definition as vague and ambiguous.

p. *Disney.* The phrase “Disney” refers to the Walt Disney Company and any of its divisions, parents, subsidiaries, related or affiliated companies or organizations.

RESPONSE: Plaintiff objects to this definition as overly broad and unduly burdensome, to the extent that it is inclusive of “any” divisions, parents, subsidiaries, related or affiliated companies or organizations.”

REQUESTS

1. Please produce all contracts or other communications reflecting or otherwise relating to any obligations, plans, issues, complaints, concerns, termination, and compensation to/for Mr. Depp’s role(s) in any of the Pirates of the Caribbean Films.

RESPONSE:

Plaintiff repeats and incorporates by this reference the General Objections and Objections to Definitions and Instruction above, as though set forth in full. Plaintiff further objects to this Request on the grounds that it is overly broad and unduly burdensome, taking into account the needs of the case, including as to the Request's unreasonably open-ended demand for "communications reflecting or otherwise relating to" and "obligations, plans, issues, complaints, concerns, termination, and compensation," and as to both time and scope. Plaintiff further objects to this Request on the grounds that it seeks confidential, proprietary, and private personal and/or business information of Plaintiff and/or third parties to this litigation, which is not subject to discovery in this action. Plaintiff further objects to this Request on the grounds that responsive documents are obtainable from other sources that are more convenient, less burdensome, and less expensive. Plaintiff further objects to this Request on the grounds that it seeks documents that are not within Plaintiff's possession, custody or control. Plaintiff further objects to this Request on the grounds and to the extent that it seeks documents protected by the attorney-client privilege, work product doctrine, and/or any other applicable privilege, immunity, or protection. Plaintiff further objects to this request on the grounds that it is vague and ambiguous, including but not limited to the terms "obligations, plans, issues, complaints, concerns, termination, and compensation." Plaintiff further objects to this request on the grounds that it is duplicative of other discovery and is needlessly cumulative. Plaintiff further objects to this Request on the grounds that it seeks documents over a two-decade period that are neither relevant nor reasonably calculated to lead to the discovery of admissible evidence. Plaintiff further objects to this Request on the grounds that it fails to reasonably particularize the categories of documents sought, and is ambiguous to the point of unintelligibility.

Subject to and without waiver of the forgoing objections, Plaintiff will produce and/or has already produced documents sufficient to show his compensation from the Pirates of the Caribbean films.

2. To the extent not responsive to Request No. 1, please produce all contracts or other agreements of any nature between Mr. Depp and Disney related to role(s) or potential role(s) in any film produced, financed, or released by Disney.

RESPONSE:

Plaintiff repeats and incorporates by this reference the General Objections and Objections to Definitions and Instruction above, as though set forth in full. Plaintiff further objects to this Request on the grounds that it is overly broad and unduly burdensome taking into account the needs of the case, as to both time and scope. Plaintiff further objects to this Request on the grounds that it seeks confidential, proprietary, and private personal and/or business information of Plaintiff and/or third parties to this litigation, which is not subject to discovery in this action. Plaintiff further objects to this Request on the grounds that responsive documents are obtainable from other sources that are more convenient, less burdensome, and less expensive. Plaintiff further objects to this Request on the grounds that it seeks documents that are not within Plaintiff's possession, custody or control. Plaintiff further objects to this Request to the extent that it seeks documents protected by the attorney-client privilege, work product doctrine, and/or any other applicable privilege, immunity, or protection. Plaintiff further objects to this request on the grounds that it is vague and ambiguous. Plaintiff further objects to this request on the grounds that it is duplicative of other discovery and is needlessly cumulative. Plaintiff further objects to this Request on the grounds that it seeks documents that are neither relevant nor reasonably calculated to lead to the discovery of admissible evidence.

Plaintiff will not produce any documents in response to this Request.

3. Please produce all contracts and communications reflecting or otherwise relating to any obligations, plans, issues, complaints, concerns, termination, and compensation to/for Mr. Depp's role(s) in the film "The Lone Ranger."

RESPONSE:

Plaintiff repeats and incorporates by this reference the General Objections and Objections to Definitions and Instruction above, as though set forth in full. Plaintiff further objects to this Request on the grounds that it is overly broad and unduly burdensome as to both time and scope, taking into account the needs of the case, including because of the language "reflecting or otherwise relating to" any "obligations, plans, issues, complaints, concerns, termination, and compensation." Plaintiff further objects to this Request on the grounds that it seeks confidential, proprietary, and private personal and/or business information of Plaintiff and/or third parties to this litigation, which is not subject to discovery in this action. Plaintiff further objects to this Request on the grounds that responsive documents are obtainable from other sources that are more convenient, less burdensome, and less expensive. Plaintiff further objects to this Request on the grounds that it seeks documents that are not within Plaintiff's possession, custody or control. Plaintiff further objects to this Request to the extent that it seeks documents protected by the attorney-client privilege, work product doctrine, and/or any other applicable privilege, immunity, or protection. Plaintiff further objects to this request on the grounds that it is vague and ambiguous. Plaintiff further objects to this Request on the grounds that it seeks documents that are neither relevant nor reasonably calculated to lead to the discovery of admissible evidence. Plaintiff further objects to this Request on the grounds that it fails to reasonably particularize the categories of documents sought and is both overbroad and vague to the point of unintelligibility, including because of its use of the language "reflecting or otherwise relating to" any "obligations, plans, issues, complaints, concerns, termination, and compensation."

Subject to and without waiver of the foregoing objections, Plaintiff will produce and/or has already produced documents sufficient to show his compensation from the film in question.

4. Please produce all contracts and communications reflecting, or otherwise relating to any obligations, plans, issues, complaints, concerns, termination, and compensation to/for Mr. Depp's role(s) in the film "Mortdecai."

RESPONSE:

Plaintiff repeats and incorporates by this reference the General Objections and Objections to Definitions and Instruction above, as though set forth in full. Plaintiff further objects to this Request on the grounds that it is overly broad and unduly burdensome taking into account the needs of the case, as to both time and scope. Plaintiff further objects to this Request on the grounds that it seeks confidential, proprietary, and private personal and/or business information of Plaintiff and/or third parties to this litigation, which is not subject to discovery in this action. Plaintiff further objects to this Request on the grounds that responsive documents are obtainable from other sources that are more convenient, less burdensome, and less expensive. Plaintiff further objects to this Request on the grounds that it seeks documents that are not within Plaintiff's possession, custody or control. Plaintiff further objects to this Request to the extent that it seeks documents protected by the attorney-client privilege, work product doctrine, and/or any other applicable privilege, immunity, or protection. Plaintiff further objects to this request on the grounds that it is vague and ambiguous. Plaintiff further objects to this Request on the grounds that it seeks documents that are neither relevant nor reasonably calculated to lead to the discovery of admissible evidence. Plaintiff further objects to this Request on the grounds that it fails to reasonably particularize the categories of documents sought and is both overbroad and vague to the point of unintelligibility, including because of its use of the language "reflecting or

otherwise relating to” any “obligations, plans, issues, complaints, concerns, termination, and compensation.”

Subject to and without waiver of the foregoing objections, Plaintiff will produce and/or has already produced documents sufficient to show his compensation from the film in question.

5. Please produce all contracts and communications reflecting or otherwise relating to any obligations, plans, issues, complaints, concerns, termination, and compensation to/for Mr. Depp’s role(s) in the film “Black Mass.”

RESPONSE:

Plaintiff repeats and incorporates by this reference the General Objections and Objections to Definitions and Instruction above, as though set forth in full. Plaintiff further objects to this Request on the grounds that it is overly broad and unduly burdensome, as to both time and scope, taking into account the needs of the case. Plaintiff further objects to this Request on the grounds that it seeks confidential, proprietary, and private personal and/or business information of Plaintiff and/or third parties to this litigation, which is not subject to discovery in this action. Plaintiff further objects to this Request on the grounds that responsive documents are obtainable from other sources that are more convenient, less burdensome, and less expensive. Plaintiff further objects to this Request on the grounds that it seeks documents that are not within Plaintiff’s possession, custody or control. Plaintiff further objects to this Request to the extent that it seeks documents protected by the attorney-client privilege, work product doctrine, and/or any other applicable privilege, immunity, or protection. Plaintiff further objects to this request on the grounds that it is vague and ambiguous. Plaintiff further objects to this Request on the grounds that it seeks documents that are neither relevant nor reasonably calculated to lead to the discovery of admissible evidence. Plaintiff further objects to this Request on the grounds that it fails to reasonably particularize the categories of documents sought and is both overbroad and

vague to the point of unintelligibility, including because of its use of the language “reflecting or otherwise relating to” any “obligations, plans, issues, complaints, concerns, termination, and compensation.”

Subject to and without waiver of the foregoing objections, Plaintiff will produce and/or has already produced documents sufficient to show his compensation from the film in question.

6. Please produce all contracts and communications reflecting or otherwise relating to any obligations, plans, issues, complaints, concerns, termination, and compensation to/for Mr. Depp’s role(s) in the film “Alice Through the Looking Glass.”

RESPONSE:

Plaintiff repeats and incorporates by this reference the General Objections and Objections to Definitions and Instruction above, as though set forth in full. Plaintiff further objects to this Request on the grounds that it is overly broad and unduly burdensome, as to both time and scope, taking into account the needs of the case. Plaintiff further objects to this Request on the grounds that it seeks confidential, proprietary, and private personal and/or business information of Plaintiff and/or third parties to this litigation, which is not subject to discovery in this action. Plaintiff further objects to this Request on the grounds that responsive documents are obtainable from other sources that are more convenient, less burdensome, and less expensive. Plaintiff further objects to this Request on the grounds that it seeks documents that are not within Plaintiff’s possession, custody or control. Plaintiff further objects to this Request to the extent that it seeks documents protected by the attorney-client privilege, work product doctrine, and/or any other applicable privilege, immunity, or protection. Plaintiff further objects to this request on the grounds that it is vague and ambiguous. Plaintiff further objects to this Request on the grounds that it seeks documents that are neither relevant nor reasonably calculated to lead to the discovery of admissible evidence. Plaintiff further objects to this Request on the grounds that it

fails to reasonably particularize the categories of documents sought and is both overbroad and vague to the point of unintelligibility, including because of its use of the language “reflecting or otherwise relating to” any “obligations, plans, issues, complaints, concerns, termination, and compensation.”

Subject to and without waiver of the foregoing objections, Plaintiff will produce and/or has already produced documents sufficient to show his compensation from the film in question.

7. Please produce all contracts and communications reflecting or otherwise relating to any obligations, plans, issues, complaints, concerns, termination, and compensation to/for Mr. Depp’s role(s) in the “Fantastic Beasts Films.”

RESPONSE:

Plaintiff repeats and incorporates by this reference the General Objections and Objections to Definitions and Instruction above, as though set forth in full. Plaintiff further objects to this Request on the grounds that it is overly broad and unduly burdensome as to both time and scope, taking into account the needs of the case. Plaintiff further objects to this Request on the grounds that it seeks confidential, proprietary, and private personal and/or business information of Plaintiff and/or third parties to this litigation, which is not subject to discovery in this action. Plaintiff further objects to this Request on the grounds that responsive documents are obtainable from other sources that are more convenient, less burdensome, and less expensive. Plaintiff further objects to this Request on the grounds that it seeks documents that are not within Plaintiff’s possession, custody or control. Plaintiff further objects to this Request to the extent that it seeks documents protected by the attorney-client privilege, work product doctrine, and/or any other applicable privilege, immunity, or protection. Plaintiff further objects to this request on the grounds that it is vague and ambiguous. Plaintiff further objects to this Request on the grounds that it seeks documents that are neither relevant nor reasonably calculated to lead to the

discovery of admissible evidence. Plaintiff further objects to this Request on the grounds that it fails to reasonably particularize the categories of documents sought and is both overbroad and vague to the point of unintelligibility, including because of its use of the language “reflecting or otherwise relating to” any “obligations, plans, issues, complaints, concerns, termination, and compensation.”

Subject to and without waiver of the foregoing objections, Plaintiff will produce and/or has already produced documents sufficient to show his compensation from the film in question.

8. Please produce all contracts and communications reflecting or otherwise relating to any obligations, plans, issues, complaints, concerns, termination and compensation to/for Mr. Depp’s role(s) in the film “Murder on the Orient Express.”

RESPONSE:

Plaintiff repeats and incorporates by this reference the General Objections and Objections to Definitions and Instruction above, as though set forth in full. Plaintiff further objects to this Request on the grounds that it is overly broad and unduly burdensome taking into account the needs of the case. Plaintiff further objects to this Request on the grounds that it seeks confidential, proprietary, and private personal and/or business information of Plaintiff and/or third parties to this litigation, which is not subject to discovery in this action. Plaintiff further objects to this Request on the grounds that responsive documents are obtainable from other sources that are more convenient, less burdensome, and less expensive. Plaintiff further objects to this Request on the grounds that it seeks documents that are not within Plaintiff’s possession, custody or control. Plaintiff further objects to this Request to the extent that it seeks documents protected by the attorney-client privilege, work product doctrine, and/or any other applicable privilege, immunity, or protection. Plaintiff further objects to this request on the grounds that it is vague and ambiguous. Plaintiff further objects to this Request on the grounds that it seeks

documents that are neither relevant nor reasonably calculated to lead to the discovery of admissible evidence. Plaintiff further objects to this Request on the grounds that it fails to reasonably particularize the categories of documents sought and is both overbroad and vague to the point of unintelligibility, including because of its use of the language “reflecting or otherwise relating to” any “obligations, plans, issues, complaints, concerns, termination, and compensation.”

Subject to and without waiver of the foregoing objections, Plaintiff will produce and/or has already produced documents sufficient to show his compensation from the film in question.

9. Please produce all contracts and communications reflecting or otherwise relating to any obligations, plans, issues, complaints, concerns, termination and compensation to/for Mr. Depp’s role(s) in the film “City of Lies.”

RESPONSE:

Plaintiff repeats and incorporates by this reference the General Objections and Objections to Definitions and Instruction above, as though set forth in full. Plaintiff further objects to this Request on the grounds that it is overly broad and unduly burdensome taking into account the needs of the case. Plaintiff further objects to this Request on the grounds that it seeks confidential, proprietary, and private personal and/or business information of Plaintiff and/or third parties to this litigation, which is not subject to discovery in this action. Plaintiff further objects to this Request on the grounds that responsive documents are obtainable from other sources that are more convenient, less burdensome, and less expensive. Plaintiff further objects to this Request on the grounds that it seeks documents that are not within Plaintiff’s possession, custody or control. Plaintiff further objects to this Request to the extent that it seeks documents protected by the attorney-client privilege, work product doctrine, and/or any other applicable privilege, immunity, or protection. Plaintiff further objects to this request on the grounds that it

is vague and ambiguous. Plaintiff further objects to this Request on the grounds that it seeks documents that are neither relevant nor reasonably calculated to lead to the discovery of admissible evidence. Plaintiff further objects to this Request on the grounds that it fails to reasonably particularize the categories of documents sought and is both overbroad and vague to the point of unintelligibility, including because of its use of the language “reflecting or otherwise relating to” any “obligations, plans, issues, complaints, concerns, termination, and compensation.”

Subject to and without waiver of the foregoing objections, Plaintiff will produce and/or has already produced documents sufficient to show his compensation from the film in question.

10. Please produce all contracts and communications reflecting or otherwise relating to any obligations, plans, issues, complaints, concerns, termination and compensation to/for Mr. Depp’s role(s) in the film “The Professor.”

RESPONSE:

Plaintiff repeats and incorporates by this reference the General Objections and Objections to Definitions and Instruction above, as though set forth in full. Plaintiff further objects to this Request on the grounds that it is overly broad and unduly burdensome taking into account the needs of the case. Plaintiff further objects to this Request on the grounds that it seeks confidential, proprietary, and private personal and/or business information of Plaintiff and/or third parties to this litigation, which is not subject to discovery in this action. Plaintiff further objects to this Request on the grounds that responsive documents are obtainable from other sources that are more convenient, less burdensome, and less expensive. Plaintiff further objects to this Request on the grounds that it seeks documents that are not within Plaintiff’s possession, custody or control. Plaintiff further objects to this Request to the extent that it seeks documents protected by the attorney-client privilege, work product doctrine, and/or any other applicable

privilege, immunity, or protection. Plaintiff further objects to this request on the grounds that it is vague and ambiguous. Plaintiff further objects to this Request on the grounds that it seeks documents that are neither relevant nor reasonably calculated to lead to the discovery of admissible evidence. Plaintiff further objects to this Request on the grounds that it fails to reasonably particularize the categories of documents sought and is both overbroad and vague to the point of unintelligibility, including because of its use of the language “reflecting or otherwise relating to” any “obligations, plans, issues, complaints, concerns, termination, and compensation.”

Subject to and without waiver of the foregoing objections, Plaintiff will produce and/or has already produced documents sufficient to show his compensation from the film in question.

11. Please produce all contracts and communications reflecting or otherwise relating to any obligations, plans, issues, complaints, concerns, termination and compensation to/for Mr. Depp’s role(s) in the film “Waiting for the Barbarians.”

RESPONSE:

Plaintiff repeats and incorporates by this reference the General Objections and Objections to Definitions and Instruction above, as though set forth in full. Plaintiff further objects to this Request on the grounds that it is overly broad and unduly burdensome taking into account the needs of the case. Plaintiff further objects to this Request on the grounds that it seeks confidential, proprietary, and private personal and/or business information of Plaintiff and/or third parties to this litigation, which is not subject to discovery in this action. Plaintiff further objects to this Request on the grounds that responsive documents are obtainable from other sources that are more convenient, less burdensome, and less expensive. Plaintiff further objects to this Request on the grounds that it seeks documents that are not within Plaintiff’s possession, custody or control. Plaintiff further objects to this Request to the extent that it seeks documents

protected by the attorney-client privilege, work product doctrine, and/or any other applicable privilege, immunity, or protection. Plaintiff further objects to this request on the grounds that it is vague and ambiguous. Plaintiff further objects to this Request on the grounds that it seeks documents that are neither relevant nor reasonably calculated to lead to the discovery of admissible evidence. Plaintiff further objects to this Request on the grounds that it fails to reasonably particularize the categories of documents sought and is both overbroad and vague to the point of unintelligibility, including because of its use of the language “reflecting or otherwise relating to” any “obligations, plans, issues, complaints, concerns, termination, and compensation.”

Subject to and without waiver of the foregoing objections, Plaintiff will produce and/or has already produced documents sufficient to show his compensation from the film in question.

12. Please produce all contracts and communications reflecting or otherwise relating to any obligations, plans, issues, complaints, concerns, termination and compensation to/for Mr. Depp’s role(s) in the film “Minamata.”

RESPONSE:

Plaintiff repeats and incorporates by this reference the General Objections and Objections to Definitions and Instruction above, as though set forth in full. Plaintiff further objects to this Request on the grounds that it is overly broad and unduly burdensome taking into account the needs of the case. Plaintiff further objects to this Request on the grounds that it seeks confidential, proprietary, and private personal and/or business information of Plaintiff and/or third parties to this litigation, which is not subject to discovery in this action. Plaintiff further objects to this Request on the grounds that responsive documents are obtainable from other sources that are more convenient, less burdensome, and less expensive. Plaintiff further objects to this Request on the grounds that it seeks documents that are not within Plaintiff’s possession,

custody or control. Plaintiff further objects to this Request to the extent that it seeks documents protected by the attorney-client privilege, work product doctrine, and/or any other applicable privilege, immunity, or protection. Plaintiff further objects to this request on the grounds that it is vague and ambiguous. Plaintiff further objects to this Request on the grounds that it seeks documents that are neither relevant nor reasonably calculated to lead to the discovery of admissible evidence. Plaintiff further objects to this Request on the grounds that it fails to reasonably particularize the categories of documents sought and is both overbroad and vague to the point of unintelligibility, including because of its use of the language “reflecting or otherwise relating to” any “obligations, plans, issues, complaints, concerns, termination, and compensation.”

Subject to and without waiver of the foregoing objections, Plaintiff will produce and/or has already produced documents sufficient to show his compensation from the film in question.

13. Please produce all contracts and communications reflecting or otherwise relating to any obligations, plans, issues, complaints, concerns, termination and compensation to/for Mr. Depp’s role(s) or tentative role(s) in the film tentatively titled “Beetlejuice 2.”

RESPONSE:

Plaintiff repeats and incorporates by this reference the General Objections and Objections to Definitions and Instruction above, as though set forth in full. Plaintiff further objects to this Request on the grounds that it is overly broad and unduly burdensome taking into account the needs of the case. Plaintiff further objects to this Request on the grounds that it seeks confidential, proprietary, and private personal and/or business information of Plaintiff and/or third parties to this litigation, which is not subject to discovery in this action. Plaintiff further objects to this Request on the grounds that responsive documents are obtainable from other sources that are more convenient, less burdensome, and less expensive. Plaintiff further objects

to this Request on the grounds that it seeks documents that are not within Plaintiff's possession, custody or control. Plaintiff further objects to this Request to the extent that it seeks documents protected by the attorney-client privilege, work product doctrine, and/or any other applicable privilege, immunity, or protection. Plaintiff further objects to this request on the grounds that it is vague and ambiguous. Plaintiff further objects to this Request on the grounds that it seeks documents that are neither relevant nor reasonably calculated to lead to the discovery of admissible evidence. Plaintiff further objects to this Request on the grounds that it fails to reasonably particularize the categories of documents sought and is both overbroad and vague to the point of unintelligibility, including because of its use of the language "reflecting or otherwise relating to" any "obligations, plans, issues, complaints, concerns, termination, and compensation."

Subject to and without waiver of the foregoing objections, Plaintiff will produce and/or has already produced documents sufficient to show his compensation from the film in question, if any.

14. Please produce all contracts and communications reflecting or otherwise relating to any obligations, plans, issues, complaints, concerns, termination and compensation to/for Mr. Depp's role(s) or tentative role(s) in the television series "Puffins."

RESPONSE:

Plaintiff repeats and incorporates by this reference the General Objections and Objections to Definitions and Instruction above, as though set forth in full. Plaintiff further objects to this Request on the grounds that it is overly broad and unduly burdensome taking into account the needs of the case. Plaintiff further objects to this Request on the grounds that it seeks confidential, proprietary, and private personal and/or business information of Plaintiff and/or third parties to this litigation, which is not subject to discovery in this action. Plaintiff further

objects to this Request on the grounds that responsive documents are obtainable from other sources that are more convenient, less burdensome, and less expensive. Plaintiff further objects to this Request on the grounds that it seeks documents that are not within Plaintiff's possession, custody or control. Plaintiff further objects to this Request to the extent that it seeks documents protected by the attorney-client privilege, work product doctrine, and/or any other applicable privilege, immunity, or protection. Plaintiff further objects to this request on the grounds that it is vague and ambiguous. Plaintiff further objects to this Request on the grounds that it seeks documents that are neither relevant nor reasonably calculated to lead to the discovery of admissible evidence. Plaintiff further objects to this Request on the grounds that it fails to reasonably particularize the categories of documents sought and is both overbroad and vague to the point of unintelligibility, including because of its use of the language "reflecting or otherwise relating to" any "obligations, plans, issues, complaints, concerns, termination, and compensation."

Subject to and without waiver of the foregoing objections, Plaintiff will produce and/or has already produced documents sufficient to show his compensation from the series in question.

15. Please produce all communications between Mr. Depp and any of his agents, managers, or other talent or commercial representatives referring to, reflecting, or otherwise relating to Mr. Depp being considered for any roles in films, commercials, tv series, or other promotional or marketing opportunities (including billboards, magazines, or other print or digital advertisements or marketing means) that Mr. Depp either did not receive or chose not to accept for any reason from December 18, 2018 to the present.

RESPONSE:

Plaintiff repeats and incorporates by this reference the General Objections and Objections to Definitions and Instruction above, as though set forth in full. Plaintiff further objects to this Request on the grounds that it is overly broad and unduly burdensome taking into account the needs of the case. Plaintiff further objects to this Request on the grounds that it seeks

confidential, proprietary, and private personal and/or business information of Plaintiff and/or third parties to this litigation, which is not subject to discovery in this action. Plaintiff further objects to this Request on the grounds that responsive documents are obtainable from other sources that are more convenient, less burdensome, and less expensive. Plaintiff further objects to this Request on the grounds that it seeks documents that are not within Plaintiff's possession, custody or control. Plaintiff further objects to this Request to the extent that it seeks documents protected by the attorney-client privilege, work product doctrine, and/or any other applicable privilege, immunity, or protection. Plaintiff further objects to this request on the grounds that it is vague and ambiguous. Plaintiff further objects to this Request on the grounds that it seeks documents that are neither relevant nor reasonably calculated to lead to the discovery of admissible evidence. Plaintiff further objects to this Request on the grounds that it fails to reasonably particularize the categories of documents sought.

Subject to and without waiver of the above-stated objections, Plaintiff will produce and/or has already produced responsive, non-privileged documents within his possession, custody, or control (if any) that can be located after a reasonable search.

16. Please produce all communications between Mr. Depp (including any of his agents, managers, or other talent or commercial representatives) and any film studio, production company, marketing company, or advertising agency referring to, reflecting, or otherwise relating to Mr. Depp being considered for any roles in films, commercials, tv series, or other promotional or marketing opportunities (including billboards, magazines, or other print or digital advertisements or marketing means) that Mr. Depp either did not receive or chose not to accept for any reason from December 18, 2018 to the present.

RESPONSE:

Plaintiff repeats and incorporates by this reference the General Objections and Objections to Definitions and Instruction above, as though set forth in full. Plaintiff further objects to this Request on the grounds that it is overly broad and unduly burdensome taking into account the

needs of the case. Plaintiff further objects to this Request on the grounds that it seeks confidential, proprietary, and private personal and/or business information of Plaintiff and/or third parties to this litigation, which is not subject to discovery in this action. Plaintiff further objects to this Request on the grounds that responsive documents are obtainable from other sources that are more convenient, less burdensome, and less expensive. Plaintiff further objects to this Request on the grounds that it seeks documents that are not within Plaintiff's possession, custody or control. Plaintiff further objects to this Request to the extent that it seeks documents protected by the attorney-client privilege, work product doctrine, and/or any other applicable privilege, immunity, or protection. Plaintiff further objects to this request on the grounds that it is vague and ambiguous. Plaintiff further objects to this Request on the grounds that it seeks documents that are neither relevant nor reasonably calculated to lead to the discovery of admissible evidence. Plaintiff further objects to this Request on the grounds that it fails to reasonably particularize the categories of documents sought.

Subject to and without waiver of the above-stated objections, Plaintiff will produce and/or has already produced responsive, non-privileged documents within his possession, custody, or control (if any) that can be located after a reasonable search.

17. Please produce all documents referring to, reflecting, or otherwise relating to Mr. Depp being considered for any roles in films, commercials, tv series, or other promotional or marketing opportunities (including billboards, magazines, or other print or digital advertisements or marketing means) that Mr. Depp either did not receive or chose not to accept for any reason from December 18, 2018 to the present.

RESPONSE:

Plaintiff repeats and incorporates by this reference the General Objections and Objections to Definitions and Instruction above, as though set forth in full. Plaintiff further objects to this Request on the grounds that it is overly broad and unduly burdensome taking into account the

needs of the case. Plaintiff further objects to this Request on the grounds that it seeks confidential, proprietary, and private personal and/or business information of Plaintiff and/or third parties to this litigation, which is not subject to discovery in this action. Plaintiff further objects to this Request on the grounds that responsive documents are obtainable from other sources that are more convenient, less burdensome, and less expensive. Plaintiff further objects to this Request on the grounds that it seeks documents that are not within Plaintiff's possession, custody or control. Plaintiff further objects to this Request to the extent that it seeks documents protected by the attorney-client privilege, work product doctrine, and/or any other applicable privilege, immunity, or protection. Plaintiff further objects to this request on the grounds that it is vague and ambiguous. Plaintiff further objects to this Request on the grounds that it seeks documents that are neither relevant nor reasonably calculated to lead to the discovery of admissible evidence. Plaintiff further objects to this Request on the grounds that it fails to reasonably particularize the categories of documents sought.

Subject to and without waiver of the above-stated objections, Plaintiff will produce and/or has already produced responsive, non-privileged documents within his possession, custody, or control (if any) that can be located after a reasonable search.

18. Please produce documents sufficient to identify all of Mr. Depp's donations to any charitable organizations from January 1, 2016 to the present, including any documents referring to any time given or donated by Mr. Depp to any charitable organizations even if no monetary donation was involved.

RESPONSE:

Plaintiff repeats and incorporates by this reference the General Objections and Objections to Definitions and Instruction above, as though set forth in full. Plaintiff further objects to this Request on the grounds that it is overly broad and unduly burdensome taking into account the needs of the case. Plaintiff further objects to this Request on the grounds that it seeks documents

that are neither relevant nor reasonably calculated to lead to the discovery of admissible evidence. Plaintiff further objects to this Request on the grounds that it seeks confidential, proprietary, and private personal and/or business information of Plaintiff and/or third parties to this litigation, which is not subject to discovery in this action. Plaintiff further objects to this Request on the grounds that responsive documents are obtainable from other sources that are more convenient, less burdensome, and less expensive. Plaintiff further objects to this Request on the grounds that it seeks documents that are not within Plaintiff's possession, custody or control. Plaintiff further objects to this request on the grounds that it is vague and ambiguous. Plaintiff further objects to this Request as harassing because it seeks information unrelated to the subject matter of this case. Plaintiff further objects to this request on the grounds that it is not reasonably tailored to the claims and defenses in this case and is harassing and overbroad. Plaintiff further objects to this Request on the grounds that it seeks documents that are neither relevant nor reasonably calculated to lead to the discovery of admissible evidence and is patently overbroad, harassing, and intrusive. Although Defendant put her own charitable donations at issue by falsely representing that she had donated the entirety of her divorce settlement money and citing those supposed donations as evidence of her motives in this action, Plaintiff's charitable donations are not at issue in this case.

Plaintiff will not produce any documents in response to this Request.

19. Please produce all documents supporting, refuting, or otherwise relating to Your First Defense.

RESPONSE:

Plaintiff repeats and incorporates by this reference the General Objections and Objections to Definitions and Instruction above, as though set forth in full. Plaintiff further objects to this Request on the grounds that it seeks documents that are neither relevant nor reasonably

calculated to lead to the discovery of admissible evidence. Plaintiff further objects to this Request on the grounds that it is overly broad and unduly burdensome taking into account the needs of the case. Plaintiff further objects to this Request on the grounds that it seeks documents that are not within Plaintiff's possession, custody, or control. Plaintiff further objects to this Request on the grounds that responsive documents are obtainable from other sources that are more convenient, less burdensome, and less expensive. Plaintiff further objects to this request on the grounds that it is not reasonably tailored to the claims and defenses in this case and is harassing and overbroad, including because of its use of the language "supporting, refuting, or otherwise relating to." Plaintiff further objects to this Request on the grounds that it is vague and ambiguous. Plaintiff further objects to this Request on the grounds that it implicates the work product doctrine, including to the extent that it seeks to intrude on the impressions and analysis of counsel as to which documents specifically "support, refute, or otherwise relate" to particular allegations in the parties' pleadings. Plaintiff further objects to this Request on the grounds that it seeks documents protected by the attorney-client privilege, work-product doctrine, and/or any other applicable privilege, immunity, or protection. Plaintiff further objects to the extent that this Request seeks the production of documents to prove a negative. Plaintiff further objects that this Request fails to reasonably particularize the category of documents sought.

Subject to and without waiver of the above-stated objections, Plaintiff will produce responsive, non-privileged documents within his possession, custody, or control (if any) that can be located after a reasonable search conducted in good faith.

20. Please produce all documents supporting, refuting, or otherwise relating to Your Second Defense.

RESPONSE:

Plaintiff repeats and incorporates by this reference the General Objections and Objections to Definitions and Instruction above, as though set forth in full. Plaintiff further objects to this Request on the grounds that it seeks documents that are neither relevant nor reasonably calculated to lead to the discovery of admissible evidence. Plaintiff further objects to this Request on the grounds that it is overly broad and unduly burdensome taking into account the needs of the case. Plaintiff further objects to this Request on the grounds that it seeks documents that are not within Plaintiff's possession, custody, or control. Plaintiff further objects to this Request on the grounds that responsive documents are obtainable from other sources that are more convenient, less burdensome, and less expensive. Plaintiff further objects to this request on the grounds that it is not reasonably tailored to the claims and defenses in this case and is harassing and overbroad, including because of its use of the language "supporting, refuting, or otherwise relating to." Plaintiff further objects to this Request on the grounds that it is vague and ambiguous. Plaintiff further objects to this Request on the grounds that it implicates the work product doctrine, including to the extent that it seeks to intrude on the impressions and analysis of counsel as to which documents specifically "support, refute, or otherwise relate" to particular allegations in the parties' pleadings. Plaintiff further objects to this Request on the grounds that it seeks documents protected by the attorney-client privilege, work-product doctrine, and/or any other applicable privilege, immunity, or protection. Plaintiff further objects to the extent that this Request seeks the production of documents to prove a negative. Plaintiff further objects that this Request fails to reasonably particularize the category of documents sought.

Subject to and without waiver of the above-stated objections, Plaintiff will produce responsive, non-privileged documents within his possession, custody, or control (if any) that can be located after a reasonable search conducted in good faith.

21. Please produce all documents supporting, refuting, or otherwise relating to Your Third Defense.

RESPONSE:

Plaintiff repeats and incorporates by this reference the General Objections and Objections to Definitions and Instruction above, as though set forth in full. Plaintiff further objects to this Request on the grounds that it seeks documents that are neither relevant nor reasonably calculated to lead to the discovery of admissible evidence. Plaintiff further objects to this Request on the grounds that it is overly broad and unduly burdensome taking into account the needs of the case. Plaintiff further objects to this Request on the grounds that it seeks documents that are not within Plaintiff's possession, custody, or control. Plaintiff further objects to this Request on the grounds that responsive documents are obtainable from other sources that are more convenient, less burdensome, and less expensive. Plaintiff further objects to this request on the grounds that it is not reasonably tailored to the claims and defenses in this case and is harassing and overbroad, including because of its use of the language "supporting, refuting, or otherwise relating to." Plaintiff further objects to this Request on the grounds that it is vague and ambiguous. Plaintiff further objects to this Request on the grounds that it implicates the work product doctrine, including to the extent that it seeks to intrude on the impressions and analysis of counsel as to which documents specifically "support, refute, or otherwise relate" to particular allegations in the parties' pleadings. Plaintiff further objects to this Request on the grounds that it seeks documents protected by the attorney-client privilege, work-product doctrine, and/or any

other applicable privilege, immunity, or protection. Plaintiff further objects that this Request fails to reasonably particularize the category of documents sought.

Subject to and without waiver of the above-stated objections, Plaintiff will produce responsive, non-privileged documents within his possession, custody, or control (if any) that can be located after a reasonable search conducted in good faith.

22. Please produce all documents supporting, refuting, or otherwise relating to Your Fourth Defense.

RESPONSE:

Plaintiff repeats and incorporates by this reference the General Objections and Objections to Definitions and Instruction above, as though set forth in full. Plaintiff further objects to this Request on the grounds that it seeks documents that are neither relevant nor reasonably calculated to lead to the discovery of admissible evidence. Plaintiff further objects to this Request on the grounds that it is overly broad and unduly burdensome taking into account the needs of the case. Plaintiff further objects to this Request on the grounds that it seeks documents that are not within Plaintiff's possession, custody, or control. Plaintiff further objects to this Request on the grounds that responsive documents are obtainable from other sources that are more convenient, less burdensome, and less expensive. Plaintiff further objects to this Request to the extent that it seeks documents protected by the attorney-client privilege, work product doctrine, and/or any other applicable privilege, immunity, or protection. Plaintiff further objects to this request on the grounds that it is not reasonably tailored to the claims and defenses in this case and is harassing and overbroad, including because of its use of the language "supporting, refuting, or otherwise relating to." Plaintiff further objects to this Request on the grounds that it is vague and ambiguous. Plaintiff further objects to this Request on the grounds that it implicates the work product doctrine, including to the extent that it seeks to intrude on the

impressions and analysis of counsel as to which documents specifically “support, refute, or otherwise relate” to particular allegations in the parties’ pleadings. Plaintiff further objects to this Request on the grounds that it seeks documents protected by the attorney-client privilege, work-product doctrine, and/or any other applicable privilege, immunity, or protection. Plaintiff further objects to the extent that this Request seeks the production of documents to prove a negative. Plaintiff further objects to this Request on the grounds that it seeks information already known to Defendant and alleged in Plaintiff’s Complaint, and on the further grounds that the statements in question speak for themselves. Plaintiff further objects that this Request fails to reasonably particularize the category of documents sought.

Subject to and without waiver of the above-stated objections, Plaintiff will produce responsive, non-privileged documents within his possession, custody, or control (if any) that can be located after a reasonable search conducted in good faith. However, Plaintiff specifically asserts, and does not waive, the attorney-privilege and work-product doctrine, including with respect to communications with Adam Waldman, and will not produce documents covered by those privileges in response to this Request.

23. Please produce all documents supporting, refuting, or otherwise relating to Your Fifth Defense, including any documents supporting, refuting, or otherwise relating to Your statements of any “lack of direction as to the subject statements, lack of direction or control of a third party as to the subject statements, a third-party’s exceeding the scope of employment or agency relationship as to the subject statements, and statements made by an independent contractor.”

RESPONSE:

Plaintiff repeats and incorporates by this reference the General Objections and Objections to Definitions and Instruction above, as though set forth in full. Plaintiff further objects to this Request on the grounds that it seeks documents that are neither relevant nor reasonably calculated to lead to the discovery of admissible evidence. Plaintiff further objects to this

Request on the grounds that it is overly broad and unduly burdensome taking into account the needs of the case. Plaintiff further objects to this request on the grounds that it is vague and ambiguous. Plaintiff further objects to this request on the grounds that it is lacking in reasonable particularity. Plaintiff further objects to this Request to the extent that it seeks documents protected by the attorney-client privilege, work product doctrine, and/or any other applicable privilege, immunity, or protection. Plaintiff further objects to this request on the grounds that it is not reasonably tailored to the claims and defenses in this case and is harassing and overbroad, including because of its use of the language “supporting, refuting, or otherwise relating to.” Plaintiff further objects to this Request on the grounds that it is vague and ambiguous. Plaintiff further objects to this Request on the grounds that it implicates the work product doctrine, including to the extent that it seeks to intrude on the impressions and analysis of counsel as to which documents specifically “support, refute, or otherwise relate” to particular allegations in the parties’ pleadings. Plaintiff further objects to this Request on the grounds that it seeks documents protected by the attorney-client privilege, work-product doctrine, and/or any other applicable privilege, immunity, or protection. Plaintiff further objects to the extent that this Request seeks the production of documents to prove a negative. Plaintiff further objects that this Request fails to reasonably particularize the category of documents sought.

Without waiving the above-stated objections, Plaintiff will produce responsive, non-privileged documents within his possession, custody, or control (if any) that can be located after a reasonable search conducted in good faith. However, Plaintiff specifically asserts, and does not waive, the attorney-privilege and work-product doctrine, including with respect to communications with Adam Waldman, and will not produce documents covered by those privileges in response to this Request.

24. Please produce all documents supporting, refuting, or otherwise relating to Your Sixth Defense.

RESPONSE:

Plaintiff repeats and incorporates by this reference the General Objections and Objections to Definitions and Instruction above, as though set forth in full. Plaintiff further objects to this Request on the grounds that it seeks documents that are neither relevant nor reasonably calculated to lead to the discovery of admissible evidence. Plaintiff further objects to this Request on the grounds that it is overly broad and unduly burdensome taking into account the needs of the case. Plaintiff further objects to this Request on the grounds that it seeks documents that are not within Plaintiff's possession, custody, or control. Plaintiff further objects to this Request on the grounds that responsive documents are obtainable from other sources that are more convenient, less burdensome, and less expensive. Plaintiff further objects to this request on the grounds that it is not reasonably tailored to the claims and defenses in this case and is harassing and overbroad, including because of its use of the language "supporting, refuting, or otherwise relating to." Plaintiff further objects to this Request on the grounds that it is vague and ambiguous. Plaintiff further objects to this Request on the grounds that it implicates the work product doctrine, including to the extent that it seeks to intrude on the impressions and analysis of counsel as to which documents specifically "support, refute, or otherwise relate" to particular allegations in the parties' pleadings. Plaintiff further objects to this Request on the grounds that it seeks documents protected by the attorney-client privilege, work-product doctrine, and/or any other applicable privilege, immunity, or protection. Plaintiff further objects that this Request fails to reasonably particularize the category of documents sought.

Subject to and without waiver of the above-stated objections, Plaintiff will produce responsive, non-privileged documents within his possession, custody, or control (if any) that can be located after a reasonable search conducted in good faith.

25. Please produce all documents supporting, refuting, or otherwise relating to Your Seventh Defense.

RESPONSE:

Plaintiff repeats and incorporates by this reference the General Objections and Objections to Definitions and Instruction above, as though set forth in full. Plaintiff further objects to this Request on the grounds that it seeks documents that are neither relevant nor reasonably calculated to lead to the discovery of admissible evidence. Plaintiff further objects to this Request on the grounds that it is overly broad and unduly burdensome taking into account the needs of the case. Plaintiff further objects to this Request on the grounds that it seeks documents that are not within Plaintiff's possession, custody, or control. Plaintiff further objects to this Request on the grounds that responsive documents are obtainable from other sources that are more convenient, less burdensome, and less expensive. Plaintiff further objects to this request on the grounds that it is not reasonably tailored to the claims and defenses in this case and is harassing and overbroad, including because of its use of the language "supporting, refuting, or otherwise relating to." Plaintiff further objects to this Request on the grounds that it is vague and ambiguous. Plaintiff further objects to this Request on the grounds that it implicates the work product doctrine, including to the extent that it seeks to intrude on the impressions and analysis of counsel as to which documents specifically "support, refute, or otherwise relate" to particular allegations in the parties' pleadings. Plaintiff further objects to this Request on the grounds that it seeks documents protected by the attorney-client privilege, work-product doctrine, and/or any

other applicable privilege, immunity, or protection. Plaintiff further objects that this Request fails to reasonably particularize the category of documents sought.

Subject to and without waiver of the above-stated objections, Plaintiff will produce responsive, non-privileged documents within his possession, custody, or control (if any) that can be located after a reasonable search conducted in good faith.

26. Please produce all documents supporting, refuting, or otherwise relating to Your Eighth Defense.

RESPONSE:

Plaintiff repeats and incorporates by this reference the General Objections and Objections to Definitions and Instruction above, as though set forth in full. Plaintiff further objects to this Request on the grounds that it seeks documents that are neither relevant nor reasonably calculated to lead to the discovery of admissible evidence. Plaintiff further objects to this Request on the grounds that it is overly broad and unduly burdensome taking into account the needs of the case. Plaintiff further objects to this Request on the grounds that it seeks documents that are not within Plaintiff's possession, custody, or control. Plaintiff further objects to this Request on the grounds that responsive documents are obtainable from other sources that are more convenient, less burdensome, and less expensive. Plaintiff further objects to this request on the grounds that it is not reasonably tailored to the claims and defenses in this case and is harassing and overbroad, including because of its use of the language "supporting, refuting, or otherwise relating to." Plaintiff further objects to this Request on the grounds that it is vague and ambiguous. Plaintiff further objects to this Request on the grounds that it implicates the work product doctrine, including to the extent that it seeks to intrude on the impressions and analysis of counsel as to which documents specifically "support, refute, or otherwise relate" to particular allegations in the parties' pleadings. Plaintiff further objects to this Request on the grounds that

it seeks documents protected by the attorney-client privilege, work-product doctrine, and/or any other applicable privilege, immunity, or protection. Plaintiff further objects that this Request fails to reasonably particularize the category of documents sought.

Subject to and without waiver of the above-stated objections, Plaintiff will produce responsive, non-privileged documents within his possession, custody, or control (if any) that can be located after a reasonable search conducted in good faith.

27. Please produce all documents supporting, refuting, or otherwise relating to Your Ninth Defense.

RESPONSE:

Plaintiff repeats and incorporates by this reference the General Objections and Objections to Definitions and Instruction above, as though set forth in full. Plaintiff further objects to this Request on the grounds that it seeks documents that are neither relevant nor reasonably calculated to lead to the discovery of admissible evidence. Plaintiff further objects to this Request on the grounds that it is overly broad and unduly burdensome taking into account the needs of the case. Plaintiff further objects to this Request to the extent that it seeks documents protected by the attorney-client privilege, work product doctrine, and/or any other applicable privilege, immunity, or protection. Plaintiff further objects to this request on the grounds that it is vague and ambiguous. Plaintiff further objects to this request on the grounds that it is lacking in reasonable particularity. Plaintiff further objects to this Request to the extent that it seeks documents protected by the attorney-client privilege, work product doctrine, and/or any other applicable privilege, immunity, or protection. Plaintiff further objects to this request on the grounds that it is not reasonably tailored to the claims and defenses in this case and is harassing and overbroad, including because of its use of the language “supporting, refuting, or otherwise relating to.” Plaintiff further objects to this Request on the grounds that it is vague and

ambiguous. Plaintiff further objects to this Request on the grounds that it implicates the work product doctrine, including to the extent that it seeks to intrude on the impressions and analysis of counsel as to which documents specifically “support, refute, or otherwise relate” to particular allegations in the parties’ pleadings. Plaintiff further objects that this Request fails to reasonably particularize the category of documents sought.

Subject to and without waiver of the above-stated objections, Plaintiff will produce responsive, non-privileged documents within his possession, custody, or control (if any) that can be located after a reasonable search conducted in good faith.

28. Please produce all documents supporting, refuting, or otherwise relating to Your Tenth Defense.

RESPONSE:

Plaintiff repeats and incorporates by this reference the General Objections and Objections to Definitions and Instruction above, as though set forth in full. Plaintiff further objects to this Request on the grounds that it seeks documents that are neither relevant nor reasonably calculated to lead to the discovery of admissible evidence. Plaintiff further objects to this Request on the grounds that it is overly broad and unduly burdensome taking into account the needs of the case. Plaintiff further objects to this Request to the extent that it seeks documents protected by the attorney-client privilege, work product doctrine, and/or any other applicable privilege, immunity, or protection. Plaintiff further objects to this request on the grounds that it is vague and ambiguous. Plaintiff further objects to this request on the grounds that it is lacking in reasonable particularity. Plaintiff further objects to this request on the grounds that it is not reasonably tailored to the claims and defenses in this case and is harassing and overbroad, including because of its use of the language “supporting, refuting, or otherwise relating to.” Plaintiff further objects to this Request on the grounds that it is vague and ambiguous. Plaintiff

further objects to this Request on the grounds that it implicates the work product doctrine, including to the extent that it seeks to intrude on the impressions and analysis of counsel as to which documents specifically “support, refute, or otherwise relate” to particular allegations in the parties’ pleadings. Plaintiff further objects to this Request on the grounds that it seeks documents protected by the attorney-client privilege, work-product doctrine, and/or any other applicable privilege, immunity, or protection.

Without waiving the above-stated objections, Plaintiff will produce responsive, non-privileged documents within his possession, custody, or control (if any) that can be located after a reasonable search conducted in good faith.

29. Please produce all documents supporting, refuting, or otherwise relating to Your Eleventh Defense.

RESPONSE:

Plaintiff repeats and incorporates by this reference the General Objections and Objections to Definitions and Instruction above, as though set forth in full. Plaintiff objects to this Request on the grounds that it seeks documents that are neither relevant nor reasonably calculated to lead to the discovery of admissible evidence. Plaintiff further objects to this Request on the grounds that it is overly broad and unduly burdensome taking into account the needs of the case. Plaintiff further objects to this request on the grounds that it is vague and ambiguous. Plaintiff further objects to this request on the grounds that it is duplicative of other discovery and is needlessly cumulative. Plaintiff further objects to this request on the grounds that it calls for a legal conclusion. Plaintiff further objects to this request on the grounds that it is not reasonably tailored to the claims and defenses in this case and is harassing and overbroad, including because of its use of the language “supporting, refuting, or otherwise relating to.” Plaintiff further objects to this Request on the grounds that it is vague and ambiguous. Plaintiff further objects to this

Request on the grounds that it implicates the work product doctrine, including to the extent that it seeks to intrude on the impressions and analysis of counsel as to which documents specifically “support, refute, or otherwise relate” to particular allegations in the parties’ pleadings. Plaintiff further objects to this Request on the grounds that it seeks documents protected by the attorney-client privilege, work-product doctrine, and/or any other applicable privilege, immunity, or protection.

Subject to and without waiver of the foregoing objections, Plaintiff will produce non-privileged documents responsive to this Request, if any, following a reasonable search.

30. Please produce all documents supporting, refuting, or otherwise relating to Your Twelfth Defense.

RESPONSE:

Plaintiff repeats and incorporates by this reference the General Objections and Objections to Definitions and Instruction above, as though set forth in full. Plaintiff further objects to this Request on the grounds that it seeks documents that are neither relevant nor reasonably calculated to lead to the discovery of admissible evidence. Plaintiff further objects to this Request on the grounds that it is overly broad and unduly burdensome taking into account the needs of the case. Plaintiff further objects to this Request to the extent that it seeks documents protected by the attorney-client privilege, work product doctrine, and/or any other applicable privilege, immunity, or protection. Plaintiff further objects to this request on the grounds that it is vague and ambiguous. Plaintiff further objects to this request on the grounds that it is lacking in reasonable particularity. Plaintiff further objects to this request on the grounds that it is not reasonably tailored to the claims and defenses in this case and is harassing and overbroad, including because of its use of the language “supporting, refuting, or otherwise relating to.” Plaintiff further objects to this Request on the grounds that it is vague and ambiguous. Plaintiff

further objects to this Request on the grounds that it implicates the work product doctrine, including to the extent that it seeks to intrude on the impressions and analysis of counsel as to which documents specifically “support, refute, or otherwise relate” to particular allegations in the parties’ pleadings. Plaintiff further objects to this Request on the grounds and to the extent that it implicates any other applicable privilege or immunity. Plaintiff further objects on the grounds that this request fails to describe the documents sought with any reasonable level of particularity.

Subject to and without waiver of the foregoing objections, Plaintiff will produce responsive, non-privileged documents within his possession, custody, or control (if any) that can be located after a reasonable search conducted in good faith.

31. Please produce all documents supporting, refuting, or otherwise relating to Your Thirteenth Defense.

RESPONSE:

Plaintiff repeats and incorporates by this reference the General Objections and Objections to Definitions and Instruction above, as though set forth in full. Plaintiff further objects to this Request on the grounds that it seeks documents that are neither relevant nor reasonably calculated to lead to the discovery of admissible evidence. Plaintiff further objects to this Request on the grounds that it is overly broad and unduly burdensome taking into account the needs of the case. Plaintiff further objects to this Request to the extent that it seeks documents protected by the attorney-client privilege, work product doctrine, and/or any other applicable privilege, immunity, or protection. Plaintiff further objects to this request on the grounds that it is vague and ambiguous. Plaintiff further objects to this request on the grounds that it is lacking in reasonable particularity. Plaintiff further objects to this request on the grounds that it is not reasonably tailored to the claims and defenses in this case and is harassing and overbroad. Plaintiff further objects to this Request on the grounds and to the extent that it implicates any

other applicable privilege or immunity. Plaintiff further objects on the grounds that this request is overbroad to the point of incoherence as phrased, and fails to describe the documents sought with any reasonable level of particularity. Plaintiff further objects that this Request is overbroad and ambiguous, including because of its use of the language “supporting, refuting, or otherwise relating to.” Plaintiff further objects to this Request on the grounds that it implicates the work product doctrine, including to the extent that it seeks to intrude on the impressions and analysis of counsel as to which documents specifically “support, refute, or otherwise relate” to particular allegations in the parties’ pleadings.

Without waiving the above-stated objections, Plaintiff does not have any responsive, non-privileged documents within his possession, custody, or control, as this affirmative defense is merely a reservation of rights.

32. Please produce all documents supporting, refuting, or otherwise relating to Your Fourteenth Defense.

RESPONSE:

Plaintiff repeats and incorporates by this reference the General Objections and Objections to Definitions and Instruction above, as though set forth in full. Plaintiff further objects to this Request on the grounds that it seeks documents that are neither relevant nor reasonably calculated to lead to the discovery of admissible evidence. Plaintiff further objects to this Request on the grounds that it is overly broad and unduly burdensome taking into account the needs of the case. Plaintiff further objects to this Request to the extent that it seeks documents protected by the attorney-client privilege, work product doctrine, and/or any other applicable privilege, immunity, or protection. Plaintiff further objects to this request on the grounds that it is vague and ambiguous. Plaintiff further objects to this request on the grounds that it is lacking in reasonable particularity. Plaintiff further objects to this request on the grounds that it is not

reasonably tailored to the claims and defenses in this case and is harassing and overbroad. Plaintiff further objects to this request to the extent it misrepresents Plaintiff's pleadings and is vague and ambiguous, as there is no fourteenth affirmative defense in Plaintiff's operative Answer.

Plaintiff will not produce any documents in response to this Request, as Plaintiff has not at this time asserted a fourteenth affirmative defense.

33. Please produce all documents supporting, refuting, or otherwise relating to Your Fifteenth Defense.

RESPONSE:

Plaintiff repeats and incorporates by this reference the General Objections and Objections to Definitions and Instruction above, as though set forth in full. Plaintiff further objects to this Request on the grounds that it seeks documents that are neither relevant nor reasonably calculated to lead to the discovery of admissible evidence. Plaintiff further objects to this Request on the grounds that it is overly broad and unduly burdensome taking into account the needs of the case. Plaintiff further objects to this Request to the extent that it seeks documents protected by the attorney-client privilege, work product doctrine, and/or any other applicable privilege, immunity, or protection. Plaintiff further objects to this request on the grounds that it is vague and ambiguous. Plaintiff further objects to this request on the grounds that it is lacking in reasonable particularity. Plaintiff further objects to this request on the grounds that it is not reasonably tailored to the claims and defenses in this case and is harassing and overbroad. Plaintiff further objects to this request to the extent it misrepresents Plaintiff's pleadings. Plaintiff further objects that this Request is vague and ambiguous and misstates the content of Plaintiff's Answer, which does not at this time assert a fifteenth affirmative defense.

Plaintiff will not produce any documents in response to this Request, as Plaintiff has not at this time asserted a fifteenth affirmative defense.

34. Please produce all documents supporting, refuting, or otherwise relating to Your denial of Counterclaim Plaintiff's Prayer for Relief as contained on page 25 of Your Answer and Grounds of Defense.

RESPONSE:

Plaintiff repeats and incorporates by this reference the General Objections and Objections to Definitions and Instruction above, as though set forth in full. Plaintiff further objects to this Request on the grounds that it seeks documents that are neither relevant nor reasonably calculated to lead to the discovery of admissible evidence. Plaintiff further objects to this Request on the grounds that it is overly broad and unduly burdensome taking into account the needs of the case. Plaintiff further objects to this Request to the extent that it seeks documents protected by the attorney-client privilege, work product doctrine, and/or any other applicable privilege, immunity, or protection. Plaintiff further objects to this request on the grounds that it is vague and ambiguous. Plaintiff further objects to this request on the grounds that it is lacking in reasonable particularity. Plaintiff further objects to this request on the grounds that it is not reasonably tailored to the claims and defenses in this case and is harassing and overbroad. Plaintiff further objects that this Request is overbroad and ambiguous, including because of its use of the language "supporting, refuting, or otherwise relating to." Plaintiff further objects to this Request on the grounds that it implicates the work product doctrine, including to the extent that it seeks to intrude on the impressions and analysis of counsel as to which documents specifically "support, refute, or otherwise relate" to particular allegations in the parties' pleadings.

Subject to and without waiving the above-stated objections, Plaintiff will produce responsive, non-privileged documents within his possession, custody, or control (if any) that can be located after a reasonable search conducted in good faith.

35. Please produce all documents supporting, refuting, or otherwise relating to Your denials or partial denials of any of the paragraphs or allegations in the Counterclaim.

RESPONSE:

Plaintiff repeats and incorporates by this reference the General Objections and Objections to Definitions and Instruction above, as though set forth in full. Plaintiff further objects to this Request on the grounds that it seeks documents that are neither relevant nor reasonably calculated to lead to the discovery of admissible evidence. Plaintiff further objects to this Request on the grounds that it is overly broad and unduly burdensome taking into account the needs of the case. Plaintiff further objects to this Request to the extent that it seeks documents protected by the attorney-client privilege, work product doctrine, and/or any other applicable privilege, immunity, or protection. Plaintiff further objects to this request on the grounds that it is vague and ambiguous. Plaintiff further objects to this request on the grounds that it is lacking in reasonable particularity. Plaintiff further objects to this request on the grounds that it is not reasonably tailored to the claims and defenses in this case and is harassing and overbroad. Plaintiff further objects to this request on the grounds that it is duplicative of other discovery and is needlessly cumulative. Plaintiff further objects that this Request is overbroad and ambiguous, including because of its use of the language “supporting, refuting, or otherwise relating to.” Plaintiff further objects to this Request on the grounds that it implicates the work product doctrine, including to the extent that it seeks to intrude on the impressions and analysis of counsel as to which documents specifically “support, refute, or otherwise relate” to particular

allegations in the parties' pleadings. Plaintiff further objects to this Request on the grounds that it lacks any degree of particularity.

Plaintiff will not produce any documents in response to this Request as posed. Plaintiff is willing to respond to more particularized requests that seek documents relevant to the existing claims and defenses.

36. Please produce all documents supporting, refuting, or otherwise relating to Your partial denial of ¶ 1 of the Counterclaim.

RESPONSE:

Plaintiff repeats and incorporates by this reference the General Objections and Objections to Definitions and Instruction above, as though set forth in full. Plaintiff further objects to this Request on the grounds that it seeks documents that are neither relevant nor reasonably calculated to lead to the discovery of admissible evidence. Plaintiff further objects to this Request on the grounds that it is overly broad and unduly burdensome taking into account the needs of the case. Plaintiff further objects to this Request to the extent that it seeks documents protected by the attorney-client privilege, work product doctrine, and/or any other applicable privilege, immunity, or protection. Plaintiff further objects to this request on the grounds that it is vague and ambiguous. Plaintiff further objects to this request on the grounds that it is lacking in reasonable particularity. Plaintiff further objects to this request on the grounds that it is not reasonably tailored to the claims and defenses in this case and is harassing and overbroad. Plaintiff further objects to this request on the grounds that it is duplicative of other discovery and is needlessly cumulative. Plaintiff further objects that this Request is overbroad and ambiguous, including because of its use of the language "supporting, refuting, or otherwise relating to." Plaintiff further objects to this Request on the grounds that it implicates the work product doctrine, including to the extent that it seeks to intrude on the impressions and analysis of

counsel as to which documents specifically “support, refute, or otherwise relate” to particular allegations in the parties’ pleadings. Plaintiff further objects to this Request on the grounds that it assumes facts and/or seeks documents evidencing a negative. Plaintiff further objects to this Request to the extent that it relates to mere statements of opinion and/or legal conclusions asserted in Defendant’s Counterclaim, as opposed to concrete factual allegations. Plaintiff further objects to this Request on the grounds and to the extent that it amounts to a demand for documents relevant to Defendant’s First Counterclaim, Third Claim, and/or portions of Second Claim that are no longer at issue in this case following the Court’s granting, in part, of Plaintiff’s Demurrer and Plea in Bar. Plaintiff specifically declines to undertake any obligation to produce documents in response to open-ended requests that are not directly related to the limited portions of the Counterclaim that have survived Plaintiff’s pleading challenges.

Subject to and without waiver of the foregoing objections, Plaintiff will produce and/or has already produced non-privileged documents responsive to this Request, to the extent that such documents are relevant to the claims and defenses in this case as framed by the surviving pleadings.

37. Please produce all documents supporting, refuting, or otherwise relating to Your partial denial of ¶ 4 of the Counterclaim.

RESPONSE:

Plaintiff repeats and incorporates by this reference the General Objections and Objections to Definitions and Instruction above, as though set forth in full. Plaintiff further objects to this Request on the grounds that it seeks documents that are neither relevant nor reasonably calculated to lead to the discovery of admissible evidence. Plaintiff further objects to this Request on the grounds that it is overly broad and unduly burdensome taking into account the needs of the case. Plaintiff further objects to this Request to the extent that it seeks documents

protected by the attorney-client privilege, work product doctrine, and/or any other applicable privilege, immunity, or protection. Plaintiff further objects to this request on the grounds that it is vague and ambiguous. Plaintiff further objects to this request on the grounds that it is lacking in reasonable particularity. Plaintiff further objects to this request on the grounds that it is not reasonably tailored to the claims and defenses in this case and is harassing and overbroad. Plaintiff further objects to this request on the grounds that it is duplicative of other discovery and is needlessly cumulative. Plaintiff further objects that this Request is overbroad and ambiguous, including because of its use of the language “supporting, refuting, or otherwise relating to.” Plaintiff further objects to this Request on the grounds that it implicates the work product doctrine, including to the extent that it seeks to intrude on the impressions and analysis of counsel as to which documents specifically “support, refute, or otherwise relate” to particular allegations in the parties’ pleadings. Plaintiff further objects to this Request on the grounds that it assumes facts and/or seeks documents evidencing a negative. Plaintiff further objects to this Request to the extent that it relates to mere statements of opinion and/or legal conclusions asserted in Defendant’s Counterclaim, as opposed to concrete factual allegations. Plaintiff further objects to this Request on the grounds and to the extent that it amounts to a demand for documents relevant to Defendant’s First Counterclaim, Third Claim, and/or portions of Second Claim that are no longer at issue in this case following the Court’s granting, in part, of Plaintiff’s Demurrer and Plea in Bar. Plaintiff specifically declines to undertake any obligation to produce documents in response to open-ended requests that are not directly related to the limited portions of the Counterclaim that have survived Plaintiff’s pleading challenges.

Plaintiff will not produce any documents in response to this Request.

38. Please produce all documents supporting, refuting, or otherwise relating to Your partial denial of ¶ 5 of the Counterclaim.

RESPONSE:

Plaintiff repeats and incorporates by this reference the General Objections and Objections to Definitions and Instruction above, as though set forth in full. Plaintiff further objects to this Request on the grounds that it is overly broad and unduly burdensome taking into account the needs of the case. Plaintiff further objects to this Request on the grounds that it seeks confidential, proprietary, and private personal and/or business information of Plaintiff and/or third parties to this litigation, which is not subject to discovery in this action. Plaintiff further objects to this Request on the grounds that responsive documents are obtainable from other sources that are more convenient, less burdensome, and less expensive. Plaintiff further objects to this Request to the extent that it seeks documents protected by the attorney-client privilege, work product doctrine, and/or any other applicable privilege, immunity, or protection. Plaintiff further objects to this request on the grounds that it is vague and ambiguous. Plaintiff further objects to this request on the grounds that it is lacking in reasonable particularity. Plaintiff further objects to this request on the grounds that it is not reasonably tailored to the claims and defenses in this case and is harassing and overbroad. Plaintiff further objects to this request on the grounds that it is duplicative of other discovery and is needlessly cumulative. Plaintiff further objects to this Request on the grounds and to the extent that it seeks documents protected by the attorney-client privilege, work-product doctrine, or any other applicable privilege, immunity, or protection. Plaintiff further objects that this Request is overbroad and ambiguous, including because of its use of the language “supporting, refuting, or otherwise relating to.” Plaintiff further objects to this Request on the grounds that it implicates the work product doctrine, including to the extent that it seeks to intrude on the impressions and analysis of counsel as to which documents specifically “support, refute, or otherwise relate” to particular allegations in the

parties' pleadings. Plaintiff further objects to this Request on the grounds that it assumes facts and/or seeks documents evidencing a negative. Plaintiff further objects to this Request to the extent that it relates to mere statements of opinion and/or legal conclusions asserted in Defendant's Counterclaim, as opposed to concrete factual allegations. Plaintiff further objects to this Request on the grounds and to the extent that it amounts to a demand for documents relevant to Defendant's First Counterclaim, Third Claim, and/or portions of Second Claim that are no longer at issue in this case following the Court's granting, in part, of Plaintiff's Demurrer and Plea in Bar. Plaintiff specifically declines to undertake any obligation to produce documents in response to open-ended requests that are not directly related to the limited portions of the Counterclaim that have survived Plaintiff's pleading challenges.

Subject to and without waiver of the foregoing objections, Plaintiff will produce and/or has already produced responsive, non-privileged documents within his possession, custody, or control.

39. Please produce all documents supporting, refuting, or otherwise relating to Your denial of ¶ 6 of the Counterclaim.

RESPONSE:

Plaintiff repeats and incorporates by this reference the General Objections and Objections to Definitions and Instruction above, as though set forth in full. Plaintiff further objects to this Request on the grounds that it is overly broad and unduly burdensome taking into account the needs of the case. Plaintiff further objects to this Request on the grounds that it seeks confidential, proprietary, and private personal and/or business information of Plaintiff and/or third parties to this litigation, which is not subject to discovery in this action. Plaintiff further objects to this Request on the grounds that responsive documents are obtainable from other sources that are more convenient, less burdensome, and less expensive. Plaintiff further objects

to this Request to the extent that it seeks documents protected by the attorney-client privilege, work product doctrine, and/or any other applicable privilege, immunity, or protection. Plaintiff further objects to this request on the grounds that it is vague and ambiguous. Plaintiff further objects to this request on the grounds that it is lacking in reasonable particularity. Plaintiff further objects to this request on the grounds that it is not reasonably tailored to the claims and defenses in this case and is harassing and overbroad. Plaintiff further objects to this request on the grounds that it is duplicative of other discovery and is needlessly cumulative. Plaintiff further objects to this Request on the grounds and to the extent that it seeks documents protected by the attorney-client privilege, work-product doctrine, or any other applicable privilege, immunity, or protection. Plaintiff further objects that this Request is overbroad and ambiguous, including because of its use of the language “supporting, refuting, or otherwise relating to.” Plaintiff further objects to this Request on the grounds that it implicates the work product doctrine, including to the extent that it seeks to intrude on the impressions and analysis of counsel as to which documents specifically “support, refute, or otherwise relate” to particular allegations in the parties’ pleadings. Plaintiff further objects to this Request on the grounds that it assumes facts and/or seeks documents evidencing a negative. Plaintiff further objects to this Request to the extent that it relates to mere statements of opinion and/or legal conclusions asserted in Defendant’s Counterclaim, as opposed to concrete factual allegations. Plaintiff further objects to this Request on the grounds and to the extent that it amounts to a demand for documents relevant to Defendant’s First Counterclaim, Third Claim, and/or portions of Second Claim that are no longer at issue in this case following the Court’s granting, in part, of Plaintiff’s Demurrer and Plea in Bar. Plaintiff specifically declines to undertake any obligation to produce documents in response to open-ended requests that are not directly related to the limited portions of the

Counterclaim that have survived Plaintiff's pleading challenges. Plaintiff will not produce documents in response to this Request.

40. Please produce all documents supporting, refuting, or otherwise relating to Your partial denial of ¶ 7 of the Counterclaim.

RESPONSE:

Plaintiff repeats and incorporates by this reference the General Objections and Objections to Definitions and Instruction above, as though set forth in full. Plaintiff further objects to this Request on the grounds that it is overly broad and unduly burdensome taking into account the needs of the case. Plaintiff further objects to this Request on the grounds that it seeks confidential, proprietary, and private personal and/or business information of Plaintiff and/or third parties to this litigation, which is not subject to discovery in this action. Plaintiff further objects to this Request on the grounds that responsive documents are obtainable from other sources that are more convenient, less burdensome, and less expensive. Plaintiff further objects to this Request to the extent that it seeks documents protected by the attorney-client privilege, work product doctrine, and/or any other applicable privilege, immunity, or protection. Plaintiff further objects to this request on the grounds that it is vague and ambiguous. Plaintiff further objects to this request on the grounds that it is lacking in reasonable particularity. Plaintiff further objects to this request on the grounds that it is not reasonably tailored to the claims and defenses in this case and is harassing and overbroad. Plaintiff further objects to this request on the grounds that it is duplicative of other discovery and is needlessly cumulative. Plaintiff further objects to this Request on the grounds and to the extent that it seeks documents protected by the attorney-client privilege, work-product doctrine, or any other applicable privilege, immunity, or protection. Plaintiff further objects that this Request is overbroad and ambiguous, including because of its use of the language "supporting, refuting, or otherwise relating to." Plaintiff

further objects to this Request on the grounds that it implicates the work product doctrine, including to the extent that it seeks to intrude on the impressions and analysis of counsel as to which documents specifically “support, refute, or otherwise relate” to particular allegations in the parties’ pleadings. Plaintiff further objects to this Request on the grounds that it assumes facts and/or seeks documents evidencing a negative. Plaintiff further objects to this Request to the extent that it relates to mere statements of opinion and/or legal conclusions asserted in Defendant’s Counterclaim, as opposed to concrete factual allegations. Plaintiff further objects to this Request on the grounds and to the extent that it amounts to a demand for documents relevant to Defendant’s First Counterclaim, Third Claim, and/or portions of Second Claim that are no longer at issue in this case following the Court’s granting, in part, of Plaintiff’s Demurrer and Plea in Bar. Plaintiff specifically declines to undertake any obligation to produce documents in response to open-ended requests that are not directly related to the limited portions of the Counterclaim that have survived Plaintiff’s pleading challenges. Plaintiff will not produce documents in response to this Request.

41. Please produce all documents supporting, refuting, or otherwise relating to Your denial of ¶ 8 of the Counterclaim.

RESPONSE:

Plaintiff repeats and incorporates by this reference the General Objections and Objections to Definitions and Instruction above, as though set forth in full. Plaintiff further objects to this Request on the grounds that it is overly broad and unduly burdensome taking into account the needs of the case. Plaintiff further objects to this Request on the grounds that it seeks confidential, proprietary, and private personal and/or business information of Plaintiff and/or third parties to this litigation, which is not subject to discovery in this action. Plaintiff further objects to this Request on the grounds that responsive documents are obtainable from other

sources that are more convenient, less burdensome, and less expensive. Plaintiff further objects to this Request to the extent that it seeks documents protected by the attorney-client privilege, work product doctrine, and/or any other applicable privilege, immunity, or protection. Plaintiff further objects to this request on the grounds that it is vague and ambiguous. Plaintiff further objects to this request on the grounds that it is lacking in reasonable particularity. Plaintiff further objects to this request on the grounds that it is not reasonably tailored to the claims and defenses in this case and is harassing and overbroad. Plaintiff further objects to this request on the grounds that it is duplicative of other discovery and is needlessly cumulative. Plaintiff further objects to this request on the grounds that it seeks discovery for claims already dismissed by the court in this Action. Plaintiff further objects to this Request on the grounds and to the extent that it seeks documents protected by the attorney-client privilege, work-product doctrine, or any other applicable privilege, immunity, or protection. Plaintiff further objects that this Request is overbroad and ambiguous, including because of its use of the language “supporting, refuting, or otherwise relating to.” Plaintiff further objects to this Request on the grounds that it implicates the work product doctrine, including to the extent that it seeks to intrude on the impressions and analysis of counsel as to which documents specifically “support, refute, or otherwise relate” to particular allegations in the parties’ pleadings. Plaintiff further objects to this Request on the grounds that it assumes facts and/or seeks documents evidencing a negative. Plaintiff further objects to this Request to the extent that it relates to mere statements of opinion and/or legal conclusions asserted in Defendant’s Counterclaim, as opposed to concrete factual allegations. Plaintiff further objects to this Request on the grounds and to the extent that it amounts to a demand for documents relevant to Defendant’s First Counterclaim, Third Claim, and/or portions of Second Claim that are no longer at issue in this case following the Court’s granting, in part, of

Plaintiff's Demurrer and Plea in Bar. Plaintiff specifically declines to undertake any obligation to produce documents in response to open-ended requests that are not directly related to the limited portions of the Counterclaim that have survived Plaintiff's pleading challenges.

42. Plaintiff will not produce documents in response to this Request. Please produce all documents supporting, refuting, or otherwise relating to Your denial of ¶ 9 of the Counterclaim.

RESPONSE:

Plaintiff repeats and incorporates by this reference the General Objections and Objections to Definitions and Instruction above, as though set forth in full. Plaintiff further objects to this Request on the grounds that it is overly broad and unduly burdensome taking into account the needs of the case. Plaintiff further objects to this Request on the grounds that it seeks confidential, proprietary, and private personal and/or business information of Plaintiff and/or third parties to this litigation, which is not subject to discovery in this action. Plaintiff further objects to this Request on the grounds that responsive documents are obtainable from other sources that are more convenient, less burdensome, and less expensive. Plaintiff further objects to this Request to the extent that it seeks documents protected by the attorney-client privilege, work product doctrine, and/or any other applicable privilege, immunity, or protection. Plaintiff further objects to this request on the grounds that it is vague and ambiguous. Plaintiff further objects to this request on the grounds that it is lacking in reasonable particularity. Plaintiff further objects to this request on the grounds that it is not reasonably tailored to the claims and defenses in this case and is harassing and overbroad. Plaintiff further objects to this request on the grounds that it is duplicative of other discovery and is needlessly cumulative. Plaintiff further objects to this request on the grounds that it seeks discovery for claims already dismissed by the court in this Action. Plaintiff further objects to this Request on the grounds and to the extent that it seeks

documents protected by the attorney-client privilege, work-product doctrine, or any other applicable privilege, immunity, or protection. Plaintiff further objects that this Request is overbroad and ambiguous, including because of its use of the language “supporting, refuting, or otherwise relating to.” Plaintiff further objects to this Request on the grounds that it implicates the work product doctrine, including to the extent that it seeks to intrude on the impressions and analysis of counsel as to which documents specifically “support, refute, or otherwise relate” to particular allegations in the parties’ pleadings. Plaintiff further objects to this Request on the grounds that it assumes facts and/or seeks documents evidencing a negative. Plaintiff further objects to this Request to the extent that it relates to mere statements of opinion and/or legal conclusions asserted in Defendant’s Counterclaim, as opposed to concrete factual allegations. Plaintiff further objects to this Request on the grounds and to the extent that it amounts to a demand for documents relevant to Defendant’s First Counterclaim, Third Claim, and/or portions of Second Claim that are no longer at issue in this case following the Court’s granting, in part, of Plaintiff’s Demurrer and Plea in Bar. Plaintiff specifically declines to undertake any obligation to produce documents in response to open-ended requests that are not directly related to the limited portions of the Counterclaim that have survived Plaintiff’s pleading challenges. Plaintiff will not produce documents in response to this Request.

43. Please produce all documents supporting, refuting, or otherwise relating to Your denial of ¶ 10 of the Counterclaim.

RESPONSE:

Plaintiff repeats and incorporates by this reference the General Objections and Objections to Definitions and Instruction above, as though set forth in full. Plaintiff further objects to this Request on the grounds that it is overly broad and unduly burdensome taking into account the needs of the case. Plaintiff further objects to this Request on the grounds that it seeks

confidential, proprietary, and private personal and/or business information of Plaintiff and/or third parties to this litigation, which is not subject to discovery in this action. Plaintiff further objects to this Request on the grounds that responsive documents are obtainable from other sources that are more convenient, less burdensome, and less expensive. Plaintiff further objects to this Request to the extent that it seeks documents protected by the attorney-client privilege, work product doctrine, and/or any other applicable privilege, immunity, or protection. Plaintiff further objects to this request on the grounds that it is vague and ambiguous. Plaintiff further objects to this request on the grounds that it is lacking in reasonable particularity. Plaintiff further objects to this request on the grounds that it is not reasonably tailored to the claims and defenses in this case and is harassing and overbroad. Plaintiff further objects to this request on the grounds that it is duplicative of other discovery and is needlessly cumulative. Plaintiff further objects to this request on the grounds that it seeks discovery for claims already dismissed by the court in this Action. Plaintiff further objects to this Request on the grounds and to the extent that it seeks documents protected by the attorney-client privilege, work-product doctrine, or any other applicable privilege, immunity, or protection. Plaintiff further objects that this Request is overbroad and ambiguous, including because of its use of the language “supporting, refuting, or otherwise relating to.” Plaintiff further objects to this Request on the grounds that it implicates the work product doctrine, including to the extent that it seeks to intrude on the impressions and analysis of counsel as to which documents specifically “support, refute, or otherwise relate” to particular allegations in the parties’ pleadings. Plaintiff further objects to this Request on the grounds that it assumes facts and/or seeks documents evidencing a negative. Plaintiff further objects to this Request to the extent that it relates to mere statements of opinion and/or legal conclusions asserted in Defendant’s Counterclaim, as opposed to concrete factual allegations.

Plaintiff further objects to this Request on the grounds and to the extent that it amounts to a demand for documents relevant to Defendant's First Counterclaim, Third Claim, and/or portions of Second Claim that are no longer at issue in this case following the Court's granting, in part, of Plaintiff's Demurrer and Plea in Bar. Plaintiff specifically declines to undertake any obligation to produce documents in response to open-ended requests that are not directly related to the limited portions of the Counterclaim that have survived Plaintiff's pleading challenges.

44. Plaintiff will not produce documents in response to this Request. Please produce all documents supporting, refuting, or otherwise relating to Your denial of ¶ 11 of the Counterclaim.

RESPONSE:

Plaintiff repeats and incorporates by this reference the General Objections and Objections to Definitions and Instruction above, as though set forth in full. Plaintiff further objects to this Request on the grounds that it is overly broad and unduly burdensome taking into account the needs of the case. Plaintiff further objects to this Request on the grounds that it seeks confidential, proprietary, and private personal and/or business information of Plaintiff and/or third parties to this litigation, which is not subject to discovery in this action. Plaintiff further objects to this Request on the grounds that responsive documents are obtainable from other sources that are more convenient, less burdensome, and less expensive. Plaintiff further objects to this Request to the extent that it seeks documents protected by the attorney-client privilege, work product doctrine, and/or any other applicable privilege, immunity, or protection. Plaintiff further objects to this request on the grounds that it is vague and ambiguous. Plaintiff further objects to this request on the grounds that it is lacking in reasonable particularity. Plaintiff further objects to this request on the grounds that it is not reasonably tailored to the claims and defenses in this case and is harassing and overbroad. Plaintiff further objects to this request on the grounds

that it is duplicative of other discovery and is needlessly cumulative. Plaintiff further objects to this request on the grounds that it seeks discovery for claims already dismissed by the court in this Action. Plaintiff further objects to this Request on the grounds and to the extent that it seeks documents protected by the attorney-client privilege, work-product doctrine, or any other applicable privilege, immunity, or protection. Plaintiff further objects that this Request is overbroad and ambiguous, including because of its use of the language “supporting, refuting, or otherwise relating to.” Plaintiff further objects to this Request on the grounds that it implicates the work product doctrine, including to the extent that it seeks to intrude on the impressions and analysis of counsel as to which documents specifically “support, refute, or otherwise relate” to particular allegations in the parties’ pleadings. Plaintiff further objects to this Request on the grounds that it assumes facts and/or seeks documents evidencing a negative. Plaintiff further objects to this Request to the extent that it relates to mere statements of opinion and/or legal conclusions asserted in Defendant’s Counterclaim, as opposed to concrete factual allegations. Plaintiff further objects to this Request on the grounds and to the extent that it amounts to a demand for documents relevant to Defendant’s First Counterclaim, Third Claim, and/or portions of Second Claim that are no longer at issue in this case following the Court’s granting, in part, of Plaintiff’s Demurrer and Plea in Bar. Plaintiff specifically declines to undertake any obligation to produce documents in response to open-ended requests that are not directly related to the limited portions of the Counterclaim that have survived Plaintiff’s pleading challenges.

Plaintiff will not produce documents in response to this Request.

45. Please produce all documents supporting, refuting, or otherwise relating to Your statement in response to ¶ 11 of the Counterclaim that “Counterclaim Defendant admits that Mr. Waldman may have public associations with one or more persons of Russian origin.”

RESPONSE:

Plaintiff repeats and incorporates by this reference the General Objections and Objections to Definitions and Instruction above, as though set forth in full. Plaintiff further objects to this Request on the grounds that it seeks documents that are neither relevant nor reasonably calculated to lead to the discovery of admissible evidence. Plaintiff further objects to this Request on the grounds that it is overly broad and unduly burdensome taking into account the needs of the case. Plaintiff further objects to this request on the grounds that it is vague and ambiguous. Plaintiff further objects to this Request to the extent that it seeks documents protected by the attorney-client privilege, work product doctrine, and/or any other applicable privilege, immunity, or protection. Plaintiff further objects to this Request on the grounds that responsive documents are obtainable from other sources that are more convenient, less burdensome, and less expensive. The Request seeks all communications from any person or entity, regardless of whether such communications were even with Plaintiff. Plaintiff further objects to this Request on the grounds that it seeks documents that are not within Plaintiff's possession, custody, or control. Plaintiff further objects to this Request on the grounds and to the extent that it seeks documents protected by the attorney-client privilege, work-product doctrine, or any other applicable privilege, immunity, or protection. Plaintiff further objects that this Request is overbroad and ambiguous, including because of its use of the language "supporting, refuting, or otherwise relating to." Plaintiff further objects to this Request on the grounds that it implicates the work product doctrine, including to the extent that it seeks to intrude on the impressions and analysis of counsel as to which documents specifically "support, refute, or otherwise relate" to particular allegations in the parties' pleadings. Plaintiff further objects to this Request on the grounds that it assumes facts and/or seeks documents evidencing a negative.

Plaintiff further objects to this Request to the extent that it relates to mere statements of opinion and/or legal conclusions asserted in Defendant's Counterclaim, as opposed to concrete factual allegations. Plaintiff further objects to this Request on the grounds and to the extent that it amounts to a demand for documents relevant to Defendant's First Counterclaim, Third Claim, and/or portions of Second Claim that are no longer at issue in this case following the Court's granting, in part, of Plaintiff's Demurrer and Plea in Bar. Plaintiff specifically declines to undertake any obligation to produce documents in response to open-ended requests that are not directly related to the limited portions of the Counterclaim that have survived Plaintiff's pleading challenges.

Plaintiff will not produce any documents in response to this Request.

46. Please produce all documents supporting, refuting, or otherwise relating to Your denial of ¶ 12 of the Counterclaim.

RESPONSE:

Plaintiff repeats and incorporates by this reference the General Objections and Objections to Definitions and Instruction above, as though set forth in full. Plaintiff further objects to this Request on the grounds that it seeks documents that are neither relevant nor reasonably calculated to lead to the discovery of admissible evidence. Plaintiff further objects to this Request on the grounds that it is overly broad and unduly burdensome taking into account the needs of the case. Plaintiff further objects to this request on the grounds that it is vague and ambiguous. Plaintiff further objects to this Request to the extent that it seeks documents protected by the attorney-client privilege, work product doctrine, and/or any other applicable privilege, immunity, or protection. Plaintiff further objects to this Request on the grounds that responsive documents are obtainable from other sources that are more convenient, less burdensome, and less expensive. The Request seeks all communications from any person or

entity, regardless of whether such communications were even with Plaintiff. Plaintiff further objects to this Request on the grounds that it seeks documents that are not within Plaintiff's possession, custody, or control. Plaintiff further objects to this request on the grounds that it seeks discovery for claims already dismissed by the court in this Action. Plaintiff further objects to this Request on the grounds and to the extent that it seeks documents protected by the attorney-client privilege, work-product doctrine, or any other applicable privilege, immunity, or protection. Plaintiff further objects that this Request is overbroad and ambiguous, including because of its use of the language "supporting, refuting, or otherwise relating to." Plaintiff further objects to this Request on the grounds that it implicates the work product doctrine, including to the extent that it seeks to intrude on the impressions and analysis of counsel as to which documents specifically "support, refute, or otherwise relate" to particular allegations in the parties' pleadings. Plaintiff further objects to this Request on the grounds that it assumes facts and/or seeks documents evidencing a negative. Plaintiff further objects to this Request to the extent that it relates to mere statements of opinion and/or legal conclusions asserted in Defendant's Counterclaim, as opposed to concrete factual allegations. Plaintiff further objects to this Request on the grounds and to the extent that it amounts to a demand for documents relevant to Defendant's First Counterclaim, Third Claim, and/or portions of Second Claim that are no longer at issue in this case following the Court's granting, in part, of Plaintiff's Demurrer and Plea in Bar. Plaintiff specifically declines to undertake any obligation to produce documents in response to open-ended requests that are not directly related to the limited portions of the Counterclaim that have survived Plaintiff's pleading challenges.

Plaintiff will not produce documents in response to this Request.

47. Please produce all documents supporting, refuting, or otherwise relating to Your denial of ¶¶ 13-14 of the Counterclaim.

RESPONSE:

Plaintiff repeats and incorporates by this reference the General Objections and Objections to Definitions and Instruction above, as though set forth in full. Plaintiff further objects to this Request on the grounds that it seeks documents that are neither relevant nor reasonably calculated to lead to the discovery of admissible evidence. Plaintiff further objects to this Request on the grounds that it is overly broad and unduly burdensome taking into account the needs of the case. Plaintiff further objects to this request on the grounds that it is vague and ambiguous. Plaintiff further objects to this Request to the extent that it seeks documents protected by the attorney-client privilege, work product doctrine, and/or any other applicable privilege, immunity, or protection. Plaintiff further objects to this Request on the grounds that responsive documents are obtainable from other sources that are more convenient, less burdensome, and less expensive. The Request seeks all communications from any person or entity, regardless of whether such communications were even with Plaintiff. Plaintiff further objects to this Request on the grounds that it seeks documents that are not within Plaintiff's possession, custody, or control. Plaintiff further objects to this request on the grounds that it seeks discovery for claims already dismissed by the court in this Action. Plaintiff further objects to this Request on the grounds and to the extent that it seeks documents protected by the attorney-client privilege, work-product doctrine, or any other applicable privilege, immunity, or protection. Plaintiff further objects that this Request is overbroad and ambiguous, including because of its use of the language "supporting, refuting, or otherwise relating to." Plaintiff further objects to this Request on the grounds that it implicates the work product doctrine, including to the extent that it seeks to intrude on the impressions and analysis of counsel as to

which documents specifically “support, refute, or otherwise relate” to particular allegations in the parties’ pleadings. Plaintiff further objects to this Request on the grounds that it assumes facts and/or seeks documents evidencing a negative. Plaintiff further objects to this Request to the extent that it relates to mere statements of opinion and/or legal conclusions asserted in Defendant’s Counterclaim, as opposed to concrete factual allegations. Plaintiff further objects to this Request on the grounds and to the extent that it amounts to a demand for documents relevant to Defendant’s First Counterclaim, Third Claim, and/or portions of Second Claim that are no longer at issue in this case following the Court’s granting, in part, of Plaintiff’s Demurrer and Plea in Bar. Plaintiff specifically declines to undertake any obligation to produce documents in response to open-ended requests that are not directly related to the limited portions of the Counterclaim that have survived Plaintiff’s pleading challenges.

48. Plaintiff will not produce documents in response to this Request. Please produce all documents supporting, refuting, or otherwise relating to Your denial of ¶ 15 of the Counterclaim.

RESPONSE:

Plaintiff repeats and incorporates by this reference the General Objections and Objections to Definitions and Instruction above, as though set forth in full. Plaintiff further objects to this Request on the grounds that it seeks documents that are neither relevant nor reasonably calculated to lead to the discovery of admissible evidence. Plaintiff further objects to this Request on the grounds that it is overly broad and unduly burdensome taking into account the needs of the case. Plaintiff further objects to this request on the grounds that it is vague and ambiguous. Plaintiff further objects to this Request to the extent that it seeks documents protected by the attorney-client privilege, work product doctrine, and/or any other applicable privilege, immunity, or protection. Plaintiff further objects to this Request on the grounds that

responsive documents are obtainable from other sources that are more convenient, less burdensome, and less expensive. The Request seeks all communications from any person or entity, regardless of whether such communications were even with Plaintiff. Plaintiff further objects to this Request on the grounds that it seeks documents that are not within Plaintiff's possession, custody, or control. Plaintiff further objects to this request on the grounds that it seeks discovery for claims already dismissed by the court in this Action. Plaintiff further objects to this Request on the grounds and to the extent that it seeks documents protected by the attorney-client privilege, work-product doctrine, or any other applicable privilege, immunity, or protection. Plaintiff further objects that this Request is overbroad and ambiguous, including because of its use of the language "supporting, refuting, or otherwise relating to." Plaintiff further objects to this Request on the grounds that it implicates the work product doctrine, including to the extent that it seeks to intrude on the impressions and analysis of counsel as to which documents specifically "support, refute, or otherwise relate" to particular allegations in the parties' pleadings. Plaintiff further objects to this Request on the grounds that it assumes facts and/or seeks documents evidencing a negative. Plaintiff further objects to this Request to the extent that it relates to mere statements of opinion and/or legal conclusions asserted in Defendant's Counterclaim, as opposed to concrete factual allegations. Plaintiff further objects to this Request on the grounds and to the extent that it amounts to a demand for documents relevant to Defendant's First Counterclaim, Third Claim, and/or portions of Second Claim that are no longer at issue in this case following the Court's granting, in part, of Plaintiff's Demurrer and Plea in Bar. Plaintiff specifically declines to undertake any obligation to produce documents in response to open-ended requests that are not directly related to the limited portions of the Counterclaim that have survived Plaintiff's pleading challenges.

Plaintiff will not produce documents in response to this Request.

49. Please produce all documents supporting, refuting, or otherwise relating to Your denial of ¶ 16 of the Counterclaim.

RESPONSE:

Plaintiff repeats and incorporates by this reference the General Objections and Objections to Definitions and Instruction above, as though set forth in full. Plaintiff further objects to this Request on the grounds that it seeks documents that are neither relevant nor reasonably calculated to lead to the discovery of admissible evidence. Plaintiff further objects to this Request on the grounds that it is overly broad and unduly burdensome taking into account the needs of the case. Plaintiff further objects to this request on the grounds that it is vague and ambiguous. Plaintiff further objects to this Request to the extent that it seeks documents protected by the attorney-client privilege, work product doctrine, and/or any other applicable privilege, immunity, or protection. Plaintiff further objects to this Request on the grounds that responsive documents are obtainable from other sources that are more convenient, less burdensome, and less expensive. The Request seeks all communications from any person or entity, regardless of whether such communications were even with Plaintiff. Plaintiff further objects to this Request on the grounds that it seeks documents that are not within Plaintiff's possession, custody, or control. Plaintiff further objects to this request on the grounds that it seeks discovery for claims already dismissed by the court in this Action. Plaintiff further objects to this Request on the grounds and to the extent that it seeks documents protected by the attorney-client privilege, work-product doctrine, or any other applicable privilege, immunity, or protection. Plaintiff further objects that this Request is overbroad and ambiguous, including because of its use of the language "supporting, refuting, or otherwise relating to." Plaintiff further objects to this Request on the grounds that it implicates the work product doctrine,

including to the extent that it seeks to intrude on the impressions and analysis of counsel as to which documents specifically “support, refute, or otherwise relate” to particular allegations in the parties’ pleadings. Plaintiff further objects to this Request on the grounds that it assumes facts and/or seeks documents evidencing a negative. Plaintiff further objects to this Request to the extent that it relates to mere statements of opinion and/or legal conclusions asserted in Defendant’s Counterclaim, as opposed to concrete factual allegations. Plaintiff further objects to this Request on the grounds and to the extent that it amounts to a demand for documents relevant to Defendant’s First Counterclaim, Third Claim, and/or portions of Second Claim that are no longer at issue in this case following the Court’s granting, in part, of Plaintiff’s Demurrer and Plea in Bar. Plaintiff specifically declines to undertake any obligation to produce documents in response to open-ended requests that are not directly related to the limited portions of the Counterclaim that have survived Plaintiff’s pleading challenges.

Plaintiff will not produce documents in response to this Request.

50. Please produce all documents supporting, refuting, or otherwise relating to Your partial denial of ¶ 17 of the Counterclaim, including your statement that “specifically denied Counterclaim Plaintiff’s characterization of the same.”

RESPONSE:

Plaintiff repeats and incorporates by this reference the General Objections and Objections to Definitions and Instruction above, as though set forth in full. Plaintiff further objects to this Request on the grounds that it seeks documents that are neither relevant nor reasonably calculated to lead to the discovery of admissible evidence. Plaintiff further objects to this Request on the grounds that it is overly broad and unduly burdensome taking into account the needs of the case. Plaintiff further objects to this request on the grounds that it is vague and ambiguous. Plaintiff further objects to this Request to the extent that it seeks documents

protected by the attorney-client privilege, work product doctrine, and/or any other applicable privilege, immunity, or protection. Plaintiff further objects to this Request on the grounds that responsive documents are obtainable from other sources that are more convenient, less burdensome, and less expensive. The Request seeks all communications from any person or entity, regardless of whether such communications were even with Plaintiff. Plaintiff further objects to this Request on the grounds that it seeks documents that are not within Plaintiff's possession, custody, or control. Plaintiff further objects to this request on the grounds that it seeks discovery for claims already dismissed by the court in this Action. Plaintiff further objects to this Request on the grounds and to the extent that it seeks documents protected by the attorney-client privilege, work-product doctrine, or any other applicable privilege, immunity, or protection. Plaintiff further objects that this Request is overbroad and ambiguous, including because of its use of the language "supporting, refuting, or otherwise relating to." Plaintiff further objects to this Request on the grounds that it implicates the work product doctrine, including to the extent that it seeks to intrude on the impressions and analysis of counsel as to which documents specifically "support, refute, or otherwise relate" to particular allegations in the parties' pleadings. Plaintiff further objects to this Request on the grounds that it assumes facts and/or seeks documents evidencing a negative. Plaintiff further objects to this Request to the extent that it relates to mere statements of opinion and/or legal conclusions asserted in Defendant's Counterclaim, as opposed to concrete factual allegations. Plaintiff further objects to this Request on the grounds and to the extent that it amounts to a demand for documents relevant to Defendant's First Counterclaim, Third Claim, and/or portions of Second Claim that are no longer at issue in this case following the Court's granting, in part, of Plaintiff's Demurrer and Plea in Bar. Plaintiff specifically declines to undertake any obligation to produce documents in

response to open-ended requests that are not directly related to the limited portions of the Counterclaim that have survived Plaintiff's pleading challenges.

Plaintiff will not produce documents in response to this Request.

51. Please produce all documents supporting, refuting, or otherwise relating to Your denial of ¶ 18 of the Counterclaim.

RESPONSE:

Plaintiff repeats and incorporates by this reference the General Objections and Objections to Definitions and Instruction above, as though set forth in full. Plaintiff further objects to this Request on the grounds that it seeks documents that are neither relevant nor reasonably calculated to lead to the discovery of admissible evidence. Plaintiff further objects to this Request on the grounds that it is overly broad and unduly burdensome taking into account the needs of the case. Plaintiff further objects to this request on the grounds that it is vague and ambiguous. Plaintiff further objects to this Request to the extent that it seeks documents protected by the attorney-client privilege, work product doctrine, and/or any other applicable privilege, immunity, or protection. Plaintiff further objects to this Request on the grounds that responsive documents are obtainable from other sources that are more convenient, less burdensome, and less expensive. Plaintiff further objects to this Request on the grounds that it seeks documents that are not within Plaintiff's possession, custody, or control. Plaintiff further objects to this request on the grounds that it seeks discovery for claims already dismissed by the court in this Action. Plaintiff further objects to this request on the grounds that it is not reasonably tailored to the claims and defenses in this case and is harassing and overbroad. Plaintiff further objects to this Request on the grounds and to the extent that it seeks documents protected by the attorney-client privilege, work-product doctrine, or any other applicable privilege, immunity, or protection. Plaintiff further objects that this Request is overbroad and

ambiguous, including because of its use of the language “supporting, refuting, or otherwise relating to.” Plaintiff further objects to this Request on the grounds that it implicates the work product doctrine, including to the extent that it seeks to intrude on the impressions and analysis of counsel as to which documents specifically “support, refute, or otherwise relate” to particular allegations in the parties’ pleadings. Plaintiff further objects to this Request on the grounds that it assumes facts and/or seeks documents evidencing a negative. Plaintiff further objects to this Request to the extent that it relates to mere statements of opinion and/or legal conclusions asserted in Defendant’s Counterclaim, as opposed to concrete factual allegations. Plaintiff further objects to this Request on the grounds and to the extent that it amounts to a demand for documents relevant to Defendant’s First Counterclaim, Third Claim, and/or portions of Second Claim that are no longer at issue in this case following the Court’s granting, in part, of Plaintiff’s Demurrer and Plea in Bar. Plaintiff specifically declines to undertake any obligation to produce documents in response to open-ended requests that are not directly related to the limited portions of the Counterclaim that have survived Plaintiff’s pleading challenges.

Plaintiff will not produce documents in response to this Request.

52. Please produce all documents supporting, refuting, or otherwise relating to Your statement that “denies any mischaracterization of” the facts stated in ¶ 19 of the Counterclaim.

RESPONSE:

Plaintiff repeats and incorporates by this reference the General Objections and Objections to Definitions and Instruction above, as though set forth in full. Plaintiff further objects to this Request on the grounds that it seeks documents that are neither relevant nor reasonably calculated to lead to the discovery of admissible evidence. Plaintiff further objects to this Request on the grounds that it is overly broad and unduly burdensome taking into account the

needs of the case. Plaintiff further objects to this request on the grounds that it is vague and ambiguous. Plaintiff further objects to this Request on the grounds that responsive documents are obtainable from other sources that are more convenient, less burdensome, and less expensive. The Request seeks all communications from any person or entity, regardless of whether such communications were even with Plaintiff. Plaintiff further objects to this Request on the grounds that it seeks documents that are not within Plaintiff's possession, custody, or control. Plaintiff further objects to this Request on the grounds and to the extent that it seeks documents protected by the attorney-client privilege, work-product doctrine, or any other applicable privilege, immunity, or protection. Plaintiff further objects that this Request is overbroad and ambiguous, including because of its use of the language "supporting, refuting, or otherwise relating to." Plaintiff further objects to this Request on the grounds that it implicates the work product doctrine, including to the extent that it seeks to intrude on the impressions and analysis of counsel as to which documents specifically "support, refute, or otherwise relate" to particular allegations in the parties' pleadings. Plaintiff further objects to this Request on the grounds that it assumes facts and/or seeks documents evidencing a negative. Plaintiff further objects to this Request to the extent that it relates to mere statements of opinion and/or legal conclusions asserted in Defendant's Counterclaim, as opposed to concrete factual allegations. Plaintiff further objects to this Request on the grounds and to the extent that it amounts to a demand for documents relevant to Defendant's First Counterclaim, Third Claim, and/or portions of Second Claim that are no longer at issue in this case following the Court's granting, in part, of Plaintiff's Demurrer and Plea in Bar. Plaintiff specifically declines to undertake any obligation to produce documents in response to open-ended requests that are not directly related to the limited portions of the Counterclaim that have survived Plaintiff's pleading challenges.

Plaintiff will not produce documents in response to this Request.

53. Please produce all documents supporting, refuting, or otherwise relating to Your denial of ¶ 20 of the Counterclaim.

RESPONSE:

Plaintiff repeats and incorporates by this reference the General Objections and Objections to Definitions and Instruction above, as though set forth in full. Plaintiff further objects to this Request on the grounds that it seeks documents that are neither relevant nor reasonably calculated to lead to the discovery of admissible evidence. Plaintiff further objects to this Request on the grounds that it is overly broad and unduly burdensome taking into account the needs of the case. Plaintiff further objects to this request on the grounds that it is vague and ambiguous. Plaintiff further objects to this Request on the grounds that responsive documents are obtainable from other sources that are more convenient, less burdensome, and less expensive. Plaintiff further objects to this Request on the grounds that it seeks documents that are not within Plaintiff's possession, custody, or control. Plaintiff further objects to this request on the grounds that it is not reasonably tailored to the claims and defenses in this case and is harassing and overbroad. Plaintiff further objects to this Request on the grounds and to the extent that it seeks documents protected by the attorney-client privilege, work-product doctrine, or any other applicable privilege, immunity, or protection. Plaintiff further objects that this Request is overbroad and ambiguous, including because of its use of the language "supporting, refuting, or otherwise relating to." Plaintiff further objects to this Request on the grounds that it implicates the work product doctrine, including to the extent that it seeks to intrude on the impressions and analysis of counsel as to which documents specifically "support, refute, or otherwise relate" to particular allegations in the parties' pleadings. Plaintiff further objects to this Request on the grounds that it assumes facts and/or seeks documents evidencing a negative. Plaintiff further

objects to this Request to the extent that it relates to mere statements of opinion and/or legal conclusions asserted in Defendant's Counterclaim, as opposed to concrete factual allegations. Plaintiff further objects to this Request on the grounds and to the extent that it amounts to a demand for documents relevant to Defendant's First Counterclaim, Third Claim, and/or portions of Second Claim that are no longer at issue in this case following the Court's granting, in part, of Plaintiff's Demurrer and Plea in Bar. Plaintiff specifically declines to undertake any obligation to produce documents in response to open-ended requests that are not directly related to the limited portions of the Counterclaim that have survived Plaintiff's pleading challenges.

Plaintiff will not produce documents in response to this Request.

54. Please produce all documents supporting, refuting, or otherwise relating to Your partial denial of ¶ 21 of the Counterclaim, including your denial of "Counterclaim Plaintiff's characterization of Counterclaim Defendant's statements as a threat or threats.""]

RESPONSE:

Plaintiff repeats and incorporates by this reference the General Objections and Objections to Definitions and Instruction above, as though set forth in full. Plaintiff further objects to this Request on the grounds that it seeks documents that are neither relevant nor reasonably calculated to lead to the discovery of admissible evidence. Plaintiff further objects to this Request on the grounds that it is overly broad and unduly burdensome taking into account the needs of the case. Plaintiff further objects to this request on the grounds that it is vague and ambiguous. Plaintiff further objects to this Request on the grounds that responsive documents are obtainable from other sources that are more convenient, less burdensome, and less expensive. Plaintiff further objects to this Request on the grounds that it seeks documents that are not within Plaintiff's possession, custody, or control. Plaintiff further objects to this request on the grounds that it is not reasonably tailored to the claims and defenses in this case and is harassing and

overbroad. Plaintiff further objects to this Request on the grounds and to the extent that it seeks documents protected by the attorney-client privilege, work-product doctrine, or any other applicable privilege, immunity, or protection. Plaintiff further objects that this Request is overbroad and ambiguous, including because of its use of the language “supporting, refuting, or otherwise relating to.” Plaintiff further objects to this Request on the grounds that it implicates the work product doctrine, including to the extent that it seeks to intrude on the impressions and analysis of counsel as to which documents specifically “support, refute, or otherwise relate” to particular allegations in the parties’ pleadings. Plaintiff further objects to this Request on the grounds that it assumes facts and/or seeks documents evidencing a negative. Plaintiff further objects to this Request to the extent that it relates to mere statements of opinion and/or legal conclusions asserted in Defendant’s Counterclaim, as opposed to concrete factual allegations. Plaintiff further objects to this Request on the grounds and to the extent that it amounts to a demand for documents relevant to Defendant’s First Counterclaim, Third Claim, and/or portions of Second Claim that are no longer at issue in this case following the Court’s granting, in part, of Plaintiff’s Demurrer and Plea in Bar. Plaintiff specifically declines to undertake any obligation to produce documents in response to open-ended requests that are not directly related to the limited portions of the Counterclaim that have survived Plaintiff’s pleading challenges.

Plaintiff will not produce documents in response to this Request.

55. Please produce all documents supporting, refuting, or otherwise relating to Your partial denial of ¶ 22 of the Counterclaim, including your denial of “Counterclaim Plaintiff’s characterization of Counterclaim Defendant’s statements as a threat or threats.”

RESPONSE:

Plaintiff repeats and incorporates by this reference the General Objections and Objections to Definitions and Instruction above, as though set forth in full. Plaintiff further objects to this

Request on the grounds that it seeks documents that are neither relevant nor reasonably calculated to lead to the discovery of admissible evidence. Plaintiff further objects to this Request on the grounds that it is overly broad and unduly burdensome taking into account the needs of the case. Plaintiff further objects to this request on the grounds that it is vague and ambiguous. Plaintiff further objects to this Request on the grounds that responsive documents are obtainable from other sources that are more convenient, less burdensome, and less expensive. Plaintiff further objects to this Request on the grounds that it seeks documents that are not within Plaintiff's possession, custody, or control. Plaintiff further objects to this request on the grounds that it is not reasonably tailored to the claims and defenses in this case and is harassing and overbroad. Plaintiff further objects to this Request on the grounds and to the extent that it seeks documents protected by the attorney-client privilege, work-product doctrine, or any other applicable privilege, immunity, or protection. Plaintiff further objects that this Request is overbroad and ambiguous, including because of its use of the language "supporting, refuting, or otherwise relating to." Plaintiff further objects to this Request on the grounds that it implicates the work product doctrine, including to the extent that it seeks to intrude on the impressions and analysis of counsel as to which documents specifically "support, refute, or otherwise relate" to particular allegations in the parties' pleadings. Plaintiff further objects to this Request on the grounds that it assumes facts and/or seeks documents evidencing a negative. Plaintiff further objects to this Request to the extent that it relates to mere statements of opinion and/or legal conclusions asserted in Defendant's Counterclaim, as opposed to concrete factual allegations. Plaintiff further objects to this Request on the grounds and to the extent that it amounts to a demand for documents relevant to Defendant's First Counterclaim, Third Claim, and/or portions of Second Claim that are no longer at issue in this case following the Court's granting, in part, of

Plaintiff's Demurrer and Plea in Bar. Plaintiff specifically declines to undertake any obligation to produce documents in response to open-ended requests that are not directly related to the limited portions of the Counterclaim that have survived Plaintiff's pleading challenges.

Plaintiff will not produce documents in response to this Request.

56. Please produce all documents supporting, refuting, or otherwise relating to Your partial denial of ¶ 24 of the Counterclaim.

RESPONSE:

Plaintiff repeats and incorporates by this reference the General Objections and Objections to Definitions and Instruction above, as though set forth in full. Plaintiff further objects to this Request on the grounds that it seeks documents that are neither relevant nor reasonably calculated to lead to the discovery of admissible evidence. Plaintiff further objects to this Request on the grounds that it is overly broad and unduly burdensome taking into account the needs of the case. Plaintiff further objects to this request on the grounds that it is vague and ambiguous. Plaintiff further objects to this Request on the grounds that responsive documents are obtainable from other sources that are more convenient, less burdensome, and less expensive. The Request seeks all communications from any person or entity, regardless of whether such communications were even with Plaintiff. Plaintiff further objects to this Request on the grounds that it seeks documents that are not within Plaintiff's possession, custody, or control. Plaintiff further objects to this Request on the grounds and to the extent that it seeks documents protected by the attorney-client privilege, work-product doctrine, or any other applicable privilege, immunity, or protection. Plaintiff further objects that this Request is overbroad and ambiguous, including because of its use of the language "supporting, refuting, or otherwise relating to." Plaintiff further objects to this Request on the grounds that it implicates the work product doctrine, including to the extent that it seeks to intrude on the impressions and analysis of

counsel as to which documents specifically “support, refute, or otherwise relate” to particular allegations in the parties’ pleadings. Plaintiff further objects to this Request on the grounds that it assumes facts and/or seeks documents evidencing a negative. Plaintiff further objects to this Request to the extent that it relates to mere statements of opinion and/or legal conclusions asserted in Defendant’s Counterclaim, as opposed to concrete factual allegations. Plaintiff further objects to this Request on the grounds and to the extent that it amounts to a demand for documents relevant to Defendant’s First Counterclaim, Third Claim, and/or portions of Second Claim that are no longer at issue in this case following the Court’s granting, in part, of Plaintiff’s Demurrer and Plea in Bar. Plaintiff specifically declines to undertake any obligation to produce documents in response to open-ended requests that are not directly related to the limited portions of the Counterclaim that have survived Plaintiff’s pleading challenges.

Plaintiff will not produce documents in response to this Request.

57. Please produce all documents supporting, refuting, or otherwise relating to Your partial denial of ¶ 25 of the Counterclaim, including your denial of the statement that “public opinion has never rewarded a woman for telling her story of surviving domestic abuse or violence.”

RESPONSE:

Plaintiff repeats and incorporates by this reference the General Objections and Objections to Definitions and Instruction above, as though set forth in full. Plaintiff further objects to this Request on the grounds that it seeks documents that are neither relevant nor reasonably calculated to lead to the discovery of admissible evidence. Plaintiff further objects to this Request on the grounds that it is overly broad and unduly burdensome taking into account the needs of the case. Plaintiff further objects to this request on the grounds that it is vague and ambiguous. Plaintiff further objects to this Request on the grounds that responsive documents are obtainable from other sources that are more convenient, less burdensome, and less expensive.

Plaintiff further objects to this Request on the grounds that it seeks documents that are not within Plaintiff's possession, custody, or control. Plaintiff further objects to this request on the grounds that it is not reasonably tailored to the claims and defenses in this case and is harassing and overbroad. Plaintiff further objects to this Request on the grounds and to the extent that it seeks documents protected by the attorney-client privilege, work-product doctrine, or any other applicable privilege, immunity, or protection. Plaintiff further objects that this Request is overbroad and ambiguous, including because of its use of the language "supporting, refuting, or otherwise relating to." Plaintiff further objects to this Request on the grounds that it implicates the work product doctrine, including to the extent that it seeks to intrude on the impressions and analysis of counsel as to which documents specifically "support, refute, or otherwise relate" to particular allegations in the parties' pleadings. Plaintiff further objects to this Request on the grounds that it assumes facts and/or seeks documents evidencing a negative. Plaintiff further objects to this Request to the extent that it relates to mere statements of opinion and/or legal conclusions asserted in Defendant's Counterclaim, as opposed to concrete factual allegations. Plaintiff further objects to this Request on the grounds and to the extent that it amounts to a demand for documents relevant to Defendant's First Counterclaim, Third Claim, and/or portions of Second Claim that are no longer at issue in this case following the Court's granting, in part, of Plaintiff's Demurrer and Plea in Bar. Plaintiff specifically declines to undertake any obligation to produce documents in response to open-ended requests that are not directly related to the limited portions of the Counterclaim that have survived Plaintiff's pleading challenges.

Plaintiff will not produce documents in response to this Request.

58. Please produce all documents supporting, refuting, or otherwise relating to Your denial of ¶ 26 of the Counterclaim.

RESPONSE:

Plaintiff repeats and incorporates by this reference the General Objections and Objections to Definitions and Instruction above, as though set forth in full. Plaintiff further objects to this Request on the grounds that it seeks documents that are neither relevant nor reasonably calculated to lead to the discovery of admissible evidence. Plaintiff further objects to this Request on the grounds that it is overly broad and unduly burdensome taking into account the needs of the case. Plaintiff further objects to this request on the grounds that it is vague and ambiguous. Plaintiff further objects to this Request on the grounds that responsive documents are obtainable from other sources that are more convenient, less burdensome, and less expensive. Plaintiff further objects to this Request on the grounds that it seeks documents that are not within Plaintiff's possession, custody, or control. Plaintiff further objects to this request on the grounds that it is not reasonably tailored to the claims and defenses in this case and is harassing and overbroad. Plaintiff further objects to this Request on the grounds and to the extent that it seeks documents protected by the attorney-client privilege, work-product doctrine, or any other applicable privilege, immunity, or protection. Plaintiff further objects that this Request is overbroad and ambiguous, including because of its use of the language "supporting, refuting, or otherwise relating to." Plaintiff further objects to this Request on the grounds that it implicates the work product doctrine, including to the extent that it seeks to intrude on the impressions and analysis of counsel as to which documents specifically "support, refute, or otherwise relate" to particular allegations in the parties' pleadings. Plaintiff further objects to this Request on the grounds that it assumes facts and/or seeks documents evidencing a negative. Plaintiff further objects to this Request to the extent that it relates to mere statements of opinion and/or legal conclusions asserted in Defendant's Counterclaim, as opposed to concrete factual allegations.

Plaintiff further objects to this Request on the grounds and to the extent that it amounts to a demand for documents relevant to Defendant's First Counterclaim, Third Claim, and/or portions of Second Claim that are no longer at issue in this case following the Court's granting, in part, of Plaintiff's Demurrer and Plea in Bar. Plaintiff specifically declines to undertake any obligation to produce documents in response to open-ended requests that are not directly related to the limited portions of the Counterclaim that have survived Plaintiff's pleading challenges.

Plaintiff will not produce documents in response to this Request.

59. Please produce all documents supporting, refuting, or otherwise relating to Your denial of ¶ 27 of the Counterclaim.

RESPONSE:

Plaintiff repeats and incorporates by this reference the General Objections and Objections to Definitions and Instruction above, as though set forth in full. Plaintiff further objects to this Request on the grounds that it seeks documents that are neither relevant nor reasonably calculated to lead to the discovery of admissible evidence. Plaintiff further objects to this Request on the grounds that it is overly broad and unduly burdensome taking into account the needs of the case. Plaintiff further objects to this request on the grounds that it is vague and ambiguous. Plaintiff further objects to this Request on the grounds that responsive documents are obtainable from other sources that are more convenient, less burdensome, and less expensive. Plaintiff further objects to this Request on the grounds that it seeks documents that are not within Plaintiff's possession, custody, or control. Plaintiff further objects to this request on the grounds that it is not reasonably tailored to the claims and defenses in this case and is harassing and overbroad. Plaintiff further objects to this Request on the grounds and to the extent that it seeks documents protected by the attorney-client privilege, work-product doctrine, or any other applicable privilege, immunity, or protection. Plaintiff further objects that this Request is

overbroad and ambiguous, including because of its use of the language “supporting, refuting, or otherwise relating to.” Plaintiff further objects to this Request on the grounds that it implicates the work product doctrine, including to the extent that it seeks to intrude on the impressions and analysis of counsel as to which documents specifically “support, refute, or otherwise relate” to particular allegations in the parties’ pleadings. Plaintiff further objects to this Request on the grounds that it assumes facts and/or seeks documents evidencing a negative. Plaintiff further objects to this Request to the extent that it relates to mere statements of opinion and/or legal conclusions asserted in Defendant’s Counterclaim, as opposed to concrete factual allegations. Plaintiff further objects to this Request on the grounds and to the extent that it amounts to a demand for documents relevant to Defendant’s First Counterclaim, Third Claim, and/or portions of Second Claim that are no longer at issue in this case following the Court’s granting, in part, of Plaintiff’s Demurrer and Plea in Bar. Plaintiff specifically declines to undertake any obligation to produce documents in response to open-ended requests that are not directly related to the limited portions of the Counterclaim that have survived Plaintiff’s pleading challenges.

Plaintiff will not produce documents in response to this Request.

60. Please produce all documents supporting, refuting, or otherwise relating to Your denial of ¶ 28 of the Counterclaim.

RESPONSE:

Plaintiff repeats and incorporates by this reference the General Objections and Objections to Definitions and Instruction above, as though set forth in full. Plaintiff further objects to this Request on the grounds that it seeks documents that are neither relevant nor reasonably calculated to lead to the discovery of admissible evidence. Plaintiff further objects to this Request on the grounds that it is overly broad and unduly burdensome taking into account the needs of the case. Plaintiff further objects to this request on the grounds that it is vague and

ambiguous. Plaintiff further objects to this Request on the grounds that responsive documents are obtainable from other sources that are more convenient, less burdensome, and less expensive. Plaintiff further objects to this Request on the grounds that it seeks documents that are not within Plaintiff's possession, custody, or control. Plaintiff further objects to this request on the grounds that it is not reasonably tailored to the claims and defenses in this case and is harassing and overbroad. Plaintiff further objects to this Request on the grounds and to the extent that it seeks documents protected by the attorney-client privilege, work-product doctrine, or any other applicable privilege, immunity, or protection. Plaintiff further objects that this Request is overbroad and ambiguous, including because of its use of the language "supporting, refuting, or otherwise relating to." Plaintiff further objects to this Request on the grounds that it implicates the work product doctrine, including to the extent that it seeks to intrude on the impressions and analysis of counsel as to which documents specifically "support, refute, or otherwise relate" to particular allegations in the parties' pleadings. Plaintiff further objects to this Request on the grounds that it assumes facts and/or seeks documents evidencing a negative. Plaintiff further objects to this Request to the extent that it relates to mere statements of opinion and/or legal conclusions asserted in Defendant's Counterclaim, as opposed to concrete factual allegations. Plaintiff further objects to this Request on the grounds and to the extent that it amounts to a demand for documents relevant to Defendant's First Counterclaim, Third Claim, and/or portions of Second Claim that are no longer at issue in this case following the Court's granting, in part, of Plaintiff's Demurrer and Plea in Bar. Plaintiff specifically declines to undertake any obligation to produce documents in response to open-ended requests that are not directly related to the limited portions of the Counterclaim that have survived Plaintiff's pleading challenges.

Plaintiff will not produce documents in response to this Request.

61. Please produce all documents supporting, refuting, or otherwise relating to Your statement “Adam Waldman has had communications with witnesses” in response to ¶ 29 of the Counterclaim.

RESPONSE:

Plaintiff repeats and incorporates by this reference the General Objections and Objections to Definitions and Instruction above, as though set forth in full. Plaintiff further objects to this Request on the grounds that it seeks documents that are neither relevant nor reasonably calculated to lead to the discovery of admissible evidence. Plaintiff further objects to this Request on the grounds that it is overly broad and unduly burdensome taking into account the needs of the case. Plaintiff further objects to this request on the grounds that it is vague and ambiguous. Plaintiff further objects to this Request to the extent that it seeks documents protected by the attorney-client privilege, work product doctrine, and/or any other applicable privilege, immunity, or protection. Plaintiff further objects to this Request on the grounds that responsive documents are obtainable from other sources that are more convenient, less burdensome, and less expensive. The Request seeks all communications from any person or entity, regardless of whether such communications were even with Plaintiff. Plaintiff further objects to this Request on the grounds that it seeks documents that are not within Plaintiff’s possession, custody, or control. Plaintiff further objects to this Request on the grounds and to the extent that it seeks documents protected by the attorney-client privilege, work-product doctrine, or any other applicable privilege, immunity, or protection. Plaintiff further objects that this Request is overbroad and ambiguous, including because of its use of the language “supporting, refuting, or otherwise relating to.” Plaintiff further objects to this Request on the grounds that it implicates the work product doctrine, including to the extent that it seeks to intrude on the impressions and analysis of counsel as to which documents specifically “support, refute, or

otherwise relate” to particular allegations in the parties’ pleadings. Plaintiff further objects to this Request on the grounds that it assumes facts and/or seeks documents evidencing a negative. Plaintiff further objects to this Request to the extent that it relates to mere statements of opinion and/or legal conclusions asserted in Defendant’s Counterclaim, as opposed to concrete factual allegations. Plaintiff further objects to this Request on the grounds and to the extent that it amounts to a demand for documents relevant to Defendant’s First Counterclaim, Third Claim, and/or portions of Second Claim that are no longer at issue in this case following the Court’s granting, in part, of Plaintiff’s Demurrer and Plea in Bar. Plaintiff specifically declines to undertake any obligation to produce documents in response to open-ended requests that are not directly related to the limited portions of the Counterclaim that have survived Plaintiff’s pleading challenges.

Plaintiff will not produce any documents in response to this Request.

62. Please produce all documents supporting, refuting, or otherwise relating to Your partial denial of ¶ 29 of the Counterclaim.

RESPONSE:

Plaintiff repeats and incorporates by this reference the General Objections and Objections to Definitions and Instruction above, as though set forth in full. Plaintiff further objects to this Request on the grounds that it seeks documents that are neither relevant nor reasonably calculated to lead to the discovery of admissible evidence. Plaintiff further objects to this Request on the grounds that it is overly broad and unduly burdensome taking into account the needs of the case. Plaintiff further objects to this request on the grounds that it is vague and ambiguous. Plaintiff further objects to this Request to the extent that it seeks documents protected by the attorney-client privilege, work product doctrine, and/or any other applicable privilege, immunity, or protection. Plaintiff further objects to this Request on the grounds that

responsive documents are obtainable from other sources that are more convenient, less burdensome, and less expensive. The Request seeks all communications from any person or entity, regardless of whether such communications were even with Plaintiff. Plaintiff further objects to this Request on the grounds that it seeks documents that are not within Plaintiff's possession, custody, or control. Plaintiff further objects to this Request on the grounds and to the extent that it seeks documents protected by the attorney-client privilege, work-product doctrine, or any other applicable privilege, immunity, or protection. Plaintiff further objects that this Request is overbroad and ambiguous, including because of its use of the language "supporting, refuting, or otherwise relating to." Plaintiff further objects to this Request on the grounds that it implicates the work product doctrine, including to the extent that it seeks to intrude on the impressions and analysis of counsel as to which documents specifically "support, refute, or otherwise relate" to particular allegations in the parties' pleadings. Plaintiff further objects to this Request on the grounds that it assumes facts and/or seeks documents evidencing a negative. Plaintiff further objects to this Request to the extent that it relates to mere statements of opinion and/or legal conclusions asserted in Defendant's Counterclaim, as opposed to concrete factual allegations. Plaintiff further objects to this Request on the grounds and to the extent that it amounts to a demand for documents relevant to Defendant's First Counterclaim, Third Claim, and/or portions of Second Claim that are no longer at issue in this case following the Court's granting, in part, of Plaintiff's Demurrer and Plea in Bar. Plaintiff specifically declines to undertake any obligation to produce documents in response to open-ended requests that are not directly related to the limited portions of the Counterclaim that have survived Plaintiff's pleading challenges.

Plaintiff will not produce documents in response to this Request.

63. Please produce all documents supporting, refuting, or otherwise relating to Your statement “Mr. Waldman has released one or more declarations in the public sphere” in response to ¶ 30 of the Counterclaim.

RESPONSE:

Plaintiff repeats and incorporates by this reference the General Objections and Objections to Definitions and Instruction above, as though set forth in full. Plaintiff further objects to this Request on the grounds that it seeks documents that are neither relevant nor reasonably calculated to lead to the discovery of admissible evidence. Plaintiff further objects to this Request on the grounds that it is overly broad and unduly burdensome taking into account the needs of the case. Plaintiff further objects to this request on the grounds that it is vague and ambiguous. Plaintiff further objects to this Request to the extent that it seeks documents protected by the attorney-client privilege, work product doctrine, and/or any other applicable privilege, immunity, or protection. Plaintiff further objects to this Request on the grounds that responsive documents are obtainable from other sources that are more convenient, less burdensome, and less expensive. The Request seeks all communications from any person or entity, regardless of whether such communications were even with Plaintiff. Plaintiff further objects to this Request on the grounds that it seeks documents that are not within Plaintiff’s possession, custody, or control. Plaintiff further objects to this Request on the grounds and to the extent that it seeks documents protected by the attorney-client privilege, work-product doctrine, or any other applicable privilege, immunity, or protection. Plaintiff further objects that this Request is overbroad and ambiguous, including because of its use of the language “supporting, refuting, or otherwise relating to.” Plaintiff further objects to this Request on the grounds that it implicates the work product doctrine, including to the extent that it seeks to intrude on the impressions and analysis of counsel as to which documents specifically “support, refute, or

otherwise relate” to particular allegations in the parties’ pleadings. Plaintiff further objects to this Request on the grounds that it assumes facts and/or seeks documents evidencing a negative. Plaintiff further objects to this Request to the extent that it relates to mere statements of opinion and/or legal conclusions asserted in Defendant’s Counterclaim, as opposed to concrete factual allegations. Plaintiff further objects to this Request on the grounds and to the extent that it amounts to a demand for documents relevant to Defendant’s First Counterclaim, Third Claim, and/or portions of Second Claim that are no longer at issue in this case following the Court’s granting, in part, of Plaintiff’s Demurrer and Plea in Bar. Plaintiff specifically declines to undertake any obligation to produce documents in response to open-ended requests that are not directly related to the limited portions of the Counterclaim that have survived Plaintiff’s pleading challenges.

Plaintiff will not produce documents in response to this Request.

64. Please produce all documents supporting, refuting, or otherwise relating to Your statement “Mr. Waldman has publicly commented about this litigation” in response to ¶ 30 of the Counterclaim.

RESPONSE:

Plaintiff repeats and incorporates by this reference the General Objections and Objections to Definitions and Instruction above, as though set forth in full. Plaintiff further objects to this Request on the grounds that it seeks documents that are neither relevant nor reasonably calculated to lead to the discovery of admissible evidence. Plaintiff further objects to this Request on the grounds that it is overly broad and unduly burdensome taking into account the needs of the case. Plaintiff further objects to this request on the grounds that it is vague and ambiguous. Plaintiff further objects to this Request to the extent that it seeks documents protected by the attorney-client privilege, work product doctrine, and/or any other applicable

privilege, immunity, or protection. Plaintiff further objects to this Request on the grounds that responsive documents are obtainable from other sources that are more convenient, less burdensome, and less expensive. The Request seeks all communications from any person or entity, regardless of whether such communications were even with Plaintiff. Plaintiff further objects to this Request on the grounds that it seeks documents that are not within Plaintiff's possession, custody, or control. Plaintiff further objects to this Request on the grounds and to the extent that it seeks documents protected by the attorney-client privilege, work-product doctrine, or any other applicable privilege, immunity, or protection. Plaintiff further objects that this Request is overbroad and ambiguous, including because of its use of the language "supporting, refuting, or otherwise relating to." Plaintiff further objects to this Request on the grounds that it implicates the work product doctrine, including to the extent that it seeks to intrude on the impressions and analysis of counsel as to which documents specifically "support, refute, or otherwise relate" to particular allegations in the parties' pleadings. Plaintiff further objects to this Request on the grounds that it assumes facts and/or seeks documents evidencing a negative. Plaintiff further objects to this Request to the extent that it relates to mere statements of opinion and/or legal conclusions asserted in Defendant's Counterclaim, as opposed to concrete factual allegations. Plaintiff further objects to this Request on the grounds and to the extent that it amounts to a demand for documents relevant to Defendant's First Counterclaim, Third Claim, and/or portions of Second Claim that are no longer at issue in this case following the Court's granting, in part, of Plaintiff's Demurrer and Plea in Bar. Plaintiff specifically declines to undertake any obligation to produce documents in response to open-ended requests that are not directly related to the limited portions of the Counterclaim that have survived Plaintiff's pleading challenges.

Plaintiff will not produce any documents in response to this Request.

65. Please produce all documents supporting, refuting, or otherwise relating to Your partial denial of ¶ 30 of the Counterclaim.

RESPONSE:

Plaintiff repeats and incorporates by this reference the General Objections and Objections to Definitions and Instruction above, as though set forth in full. Plaintiff further objects to this Request on the grounds that it seeks documents that are neither relevant nor reasonably calculated to lead to the discovery of admissible evidence. Plaintiff further objects to this Request on the grounds that it is overly broad and unduly burdensome taking into account the needs of the case. Plaintiff further objects to this request on the grounds that it is vague and ambiguous. Plaintiff further objects to this Request to the extent that it seeks documents protected by the attorney-client privilege, work product doctrine, and/or any other applicable privilege, immunity, or protection. Plaintiff further objects to this Request on the grounds that responsive documents are obtainable from other sources that are more convenient, less burdensome, and less expensive. The Request seeks all communications from any person or entity, regardless of whether such communications were even with Plaintiff. Plaintiff further objects to this Request on the grounds that it seeks documents that are not within Plaintiff's possession, custody, or control. Plaintiff further objects to this Request on the grounds and to the extent that it seeks documents protected by the attorney-client privilege, work-product doctrine, or any other applicable privilege, immunity, or protection. Plaintiff further objects that this Request is overbroad and ambiguous, including because of its use of the language "supporting, refuting, or otherwise relating to." Plaintiff further objects to this Request on the grounds that it implicates the work product doctrine, including to the extent that it seeks to intrude on the impressions and analysis of counsel as to which documents specifically "support, refute, or

otherwise relate” to particular allegations in the parties’ pleadings. Plaintiff further objects to this Request on the grounds that it assumes facts and/or seeks documents evidencing a negative. Plaintiff further objects to this Request to the extent that it relates to mere statements of opinion and/or legal conclusions asserted in Defendant’s Counterclaim, as opposed to concrete factual allegations. Plaintiff further objects to this Request on the grounds and to the extent that it amounts to a demand for documents relevant to Defendant’s First Counterclaim, Third Claim, and/or portions of Second Claim that are no longer at issue in this case following the Court’s granting, in part, of Plaintiff’s Demurrer and Plea in Bar. Plaintiff specifically declines to undertake any obligation to produce documents in response to open-ended requests that are not directly related to the limited portions of the Counterclaim that have survived Plaintiff’s pleading challenges.

Plaintiff will not produce documents in response to this Request.

66. Please produce all documents supporting, refuting, or otherwise relating to Your partial denial of ¶ 31 of the Counterclaim.

RESPONSE:

Plaintiff repeats and incorporates by this reference the General Objections and Objections to Definitions and Instruction above, as though set forth in full. Plaintiff further objects to this Request on the grounds that it seeks documents that are neither relevant nor reasonably calculated to lead to the discovery of admissible evidence. Plaintiff further objects to this Request on the grounds that it is overly broad and unduly burdensome taking into account the needs of the case. Plaintiff further objects to this request on the grounds that it is vague and ambiguous. Plaintiff further objects to this Request to the extent that it seeks documents protected by the attorney-client privilege, work product doctrine, and/or any other applicable privilege, immunity, or protection. Plaintiff further objects to this Request on the grounds that

responsive documents are obtainable from other sources that are more convenient, less burdensome, and less expensive. The Request seeks all communications from any person or entity, regardless of whether such communications were even with Plaintiff. Plaintiff further objects to this Request on the grounds that it seeks documents that are not within Plaintiff's possession, custody, or control. Plaintiff further objects to this Request on the grounds and to the extent that it seeks documents protected by the attorney-client privilege, work-product doctrine, or any other applicable privilege, immunity, or protection. Plaintiff further objects that this Request is overbroad and ambiguous, including because of its use of the language "supporting, refuting, or otherwise relating to." Plaintiff further objects to this Request on the grounds that it implicates the work product doctrine, including to the extent that it seeks to intrude on the impressions and analysis of counsel as to which documents specifically "support, refute, or otherwise relate" to particular allegations in the parties' pleadings. Plaintiff further objects to this Request on the grounds that it assumes facts and/or seeks documents evidencing a negative. Plaintiff further objects to this Request to the extent that it relates to mere statements of opinion and/or legal conclusions asserted in Defendant's Counterclaim, as opposed to concrete factual allegations. Plaintiff further objects to this Request on the grounds and to the extent that it amounts to a demand for documents relevant to Defendant's First Counterclaim, Third Claim, and/or portions of Second Claim that are no longer at issue in this case following the Court's granting, in part, of Plaintiff's Demurrer and Plea in Bar. Plaintiff specifically declines to undertake any obligation to produce documents in response to open-ended requests that are not directly related to the limited portions of the Counterclaim that have survived Plaintiff's pleading challenges.

Plaintiff will not produce any documents in response to this Request.

67. Please produce all documents supporting, refuting, or otherwise relating to Your statement “Counterclaim Defendant admits that his first video message on Instagram made reference to Counterclaim Plaintiff and this lawsuit” in response to ¶ 32 of the Counterclaim.

RESPONSE:

Plaintiff repeats and incorporates by this reference the General Objections and Objections to Definitions and Instruction above, as though set forth in full. Plaintiff further objects to this Request on the grounds that it seeks documents that are neither relevant nor reasonably calculated to lead to the discovery of admissible evidence. Plaintiff further objects to this Request on the grounds that it is overly broad and unduly burdensome taking into account the needs of the case. Plaintiff further objects to this request on the grounds that it is vague and ambiguous. Plaintiff further objects to this Request to the extent that it seeks documents protected by the attorney-client privilege, work product doctrine, and/or any other applicable privilege, immunity, or protection. Plaintiff further objects to this Request on the grounds that responsive documents are obtainable from other sources that are more convenient, less burdensome, and less expensive. The Request seeks all communications from any person or entity, regardless of whether such communications were even with Plaintiff. Plaintiff further objects to this Request on the grounds that it seeks documents that are not within Plaintiff’s possession, custody, or control. Plaintiff further objects to this Request on the grounds and to the extent that it seeks documents protected by the attorney-client privilege, work-product doctrine, or any other applicable privilege, immunity, or protection. Plaintiff further objects that this Request is overbroad and ambiguous, including because of its use of the language “supporting, refuting, or otherwise relating to.” Plaintiff further objects to this Request on the grounds that it implicates the work product doctrine, including to the extent that it seeks to intrude on the impressions and analysis of counsel as to which documents specifically “support, refute, or

otherwise relate” to particular allegations in the parties’ pleadings. Plaintiff further objects to this Request on the grounds that it assumes facts and/or seeks documents evidencing a negative. Plaintiff further objects to this Request to the extent that it relates to mere statements of opinion and/or legal conclusions asserted in Defendant’s Counterclaim, as opposed to concrete factual allegations. Plaintiff further objects to this Request on the grounds and to the extent that it amounts to a demand for documents relevant to Defendant’s First Counterclaim, Third Claim, and/or portions of Second Claim that are no longer at issue in this case following the Court’s granting, in part, of Plaintiff’s Demurrer and Plea in Bar. Plaintiff specifically declines to undertake any obligation to produce documents in response to open-ended requests that are not directly related to the limited portions of the Counterclaim that have survived Plaintiff’s pleading challenges.

Plaintiff will not produce any documents in response to this Request.

68. Please produce all documents supporting, refuting, or otherwise relating to Your denial of ¶ 32 of the Counterclaim.

RESPONSE:

Plaintiff repeats and incorporates by this reference the General Objections and Objections to Definitions and Instruction above, as though set forth in full. Plaintiff further objects to this Request on the grounds that it seeks documents that are neither relevant nor reasonably calculated to lead to the discovery of admissible evidence. Plaintiff further objects to this Request on the grounds that it is overly broad and unduly burdensome taking into account the needs of the case. Plaintiff further objects to this request on the grounds that it is vague and ambiguous. Plaintiff further objects to this Request to the extent that it seeks documents protected by the attorney-client privilege, work product doctrine, and/or any other applicable privilege, immunity, or protection. Plaintiff further objects to this Request on the grounds that

responsive documents are obtainable from other sources that are more convenient, less burdensome, and less expensive. The Request seeks all communications from any person or entity, regardless of whether such communications were even with Plaintiff. Plaintiff further objects to this Request on the grounds that it seeks documents that are not within Plaintiff's possession, custody, or control. Plaintiff further objects to this request on the grounds that it is duplicative of other discovery requests and is needlessly cumulative. Plaintiff further objects to this Request on the grounds and to the extent that it seeks documents protected by the attorney-client privilege, work-product doctrine, or any other applicable privilege, immunity, or protection. Plaintiff further objects that this Request is overbroad and ambiguous, including because of its use of the language "supporting, refuting, or otherwise relating to." Plaintiff further objects to this Request on the grounds that it implicates the work product doctrine, including to the extent that it seeks to intrude on the impressions and analysis of counsel as to which documents specifically "support, refute, or otherwise relate" to particular allegations in the parties' pleadings. Plaintiff further objects to this Request on the grounds that it assumes facts and/or seeks documents evidencing a negative. Plaintiff further objects to this Request to the extent that it relates to mere statements of opinion and/or legal conclusions asserted in Defendant's Counterclaim, as opposed to concrete factual allegations. Plaintiff further objects to this Request on the grounds and to the extent that it amounts to a demand for documents relevant to Defendant's First Counterclaim, Third Claim, and/or portions of Second Claim that are no longer at issue in this case following the Court's granting, in part, of Plaintiff's Demurrer and Plea in Bar. Plaintiff specifically declines to undertake any obligation to produce documents in response to open-ended requests that are not directly related to the limited portions of the Counterclaim that have survived Plaintiff's pleading challenges.

Plaintiff will not produce any documents in response to this Request.

69. Please produce all documents supporting, refuting, or otherwise relating to Your partial denial of ¶ 37 of the Counterclaim.

RESPONSE:

Plaintiff repeats and incorporates by this reference the General Objections and Objections to Definitions and Instruction above, as though set forth in full. Plaintiff further objects to this Request on the grounds that it seeks documents that are neither relevant nor reasonably calculated to lead to the discovery of admissible evidence. Plaintiff further objects to this Request on the grounds that it is overly broad and unduly burdensome taking into account the needs of the case. Plaintiff further objects to this request on the grounds that it is vague and ambiguous. Plaintiff further objects to this Request on the grounds that responsive documents are obtainable from other sources that are more convenient, less burdensome, and less expensive. Plaintiff further objects to this Request on the grounds that it seeks documents that are not within Plaintiff's possession, custody, or control. Plaintiff further objects to this Request on the grounds and to the extent that it seeks documents protected by the attorney-client privilege, work-product doctrine, or any other applicable privilege, immunity, or protection. Plaintiff further objects that this Request is overbroad and ambiguous, including because of its use of the language "supporting, refuting, or otherwise relating to." Plaintiff further objects to this Request on the grounds that it implicates the work product doctrine, including to the extent that it seeks to intrude on the impressions and analysis of counsel as to which documents specifically "support, refute, or otherwise relate" to particular allegations in the parties' pleadings. Plaintiff further objects to this Request on the grounds that it assumes facts and/or seeks documents evidencing a negative. Plaintiff further objects to this Request to the extent that it relates to mere statements of opinion and/or legal conclusions asserted in Defendant's Counterclaim, as opposed to

concrete factual allegations. Plaintiff further objects to this Request on the grounds and to the extent that it amounts to a demand for documents relevant to Defendant's First Counterclaim, Third Claim, and/or portions of Second Claim that are no longer at issue in this case following the Court's granting, in part, of Plaintiff's Demurrer and Plea in Bar. Plaintiff specifically declines to undertake any obligation to produce documents in response to open-ended requests that are not directly related to the limited portions of the Counterclaim that have survived Plaintiff's pleading challenges.

Subject to and without waiving the above-stated objections, Plaintiff will produce and/or has already produced responsive, non-privileged documents within his possession, custody, or control, if any, regarding the op-ed at issue in the above-captioned action.

70. Please produce all documents supporting, refuting, or otherwise relating to Your denial of ¶ 38 of the Counterclaim.

RESPONSE:

Plaintiff repeats and incorporates by this reference the General Objections and Objections to Definitions and Instruction above, as though set forth in full. Plaintiff further objects to this Request on the grounds that it seeks documents that are neither relevant nor reasonably calculated to lead to the discovery of admissible evidence. Plaintiff further objects to this Request on the grounds that it is overly broad and unduly burdensome taking into account the needs of the case. Plaintiff further objects to this request on the grounds that it is vague and ambiguous. Plaintiff further objects to this Request on the grounds that responsive documents are obtainable from other sources that are more convenient, less burdensome, and less expensive. Plaintiff further objects to this Request on the grounds that it seeks documents that are not within Plaintiff's possession, custody, or control. Plaintiff further objects to this request on the grounds that it seeks discovery for claims already dismissed by the court in this Action. Plaintiff further

objects to this Request on the grounds and to the extent that it seeks documents protected by the attorney-client privilege, work-product doctrine, or any other applicable privilege, immunity, or protection. Plaintiff further objects that this Request is overbroad and ambiguous, including because of its use of the language “supporting, refuting, or otherwise relating to.” Plaintiff further objects to this Request on the grounds that it implicates the work product doctrine, including to the extent that it seeks to intrude on the impressions and analysis of counsel as to which documents specifically “support, refute, or otherwise relate” to particular allegations in the parties’ pleadings. Plaintiff further objects to this Request on the grounds that it assumes facts and/or seeks documents evidencing a negative. Plaintiff further objects to this Request to the extent that it relates to mere statements of opinion and/or legal conclusions asserted in Defendant’s Counterclaim, as opposed to concrete factual allegations. Plaintiff further objects to this Request on the grounds and to the extent that it amounts to a demand for documents relevant to Defendant’s First Counterclaim, Third Claim, and/or portions of Second Claim that are no longer at issue in this case following the Court’s granting, in part, of Plaintiff’s Demurrer and Plea in Bar. Plaintiff specifically declines to undertake any obligation to produce documents in response to open-ended requests that are not directly related to the limited portions of the Counterclaim that have survived Plaintiff’s pleading challenges.

Subject to and without waiving the foregoing objections, Plaintiff has already produced and/or will produce responsive, non-privileged documents, if any, regarding the op-ed at issue in the above-captioned action.

71. Please produce all documents supporting, refuting, or otherwise relating to Your statement “specifically denies any suggestion that the op-ed was not intended and widely understood to refer to Counterclaim Defendant” in response to ¶ 39 of the Counterclaim.

RESPONSE:

Plaintiff repeats and incorporates by this reference the General Objections and Objections to Definitions and Instruction above, as though set forth in full. Plaintiff further objects to this Request on the grounds that it seeks documents that are neither relevant nor reasonably calculated to lead to the discovery of admissible evidence. Plaintiff further objects to this Request on the grounds that it is overly broad and unduly burdensome taking into account the needs of the case. Plaintiff further objects to this request on the grounds that it is vague and ambiguous. Plaintiff further objects to this Request on the grounds that responsive documents are obtainable from other sources that are more convenient, less burdensome, and less expensive. Plaintiff further objects to this Request on the grounds that it seeks documents that are not within Plaintiff's possession, custody, or control. Plaintiff further objects to this request on the grounds that it seeks discovery for claims already dismissed by the court in this Action. Plaintiff further objects to this Request on the grounds and to the extent that it seeks documents protected by the attorney-client privilege, work-product doctrine, or any other applicable privilege, immunity, or protection. Plaintiff further objects that this Request is overbroad and ambiguous, including because of its use of the language "supporting, refuting, or otherwise relating to." Plaintiff further objects to this Request on the grounds that it implicates the work product doctrine, including to the extent that it seeks to intrude on the impressions and analysis of counsel as to which documents specifically "support, refute, or otherwise relate" to particular allegations in the parties' pleadings. Plaintiff further objects to this Request on the grounds that it assumes facts and/or seeks documents evidencing a negative. Plaintiff further objects to this Request to the extent that it relates to mere statements of opinion and/or legal conclusions asserted in Defendant's Counterclaim, as opposed to concrete factual allegations. Plaintiff further objects to

this Request on the grounds and to the extent that it amounts to a demand for documents relevant to Defendant's First Counterclaim, Third Claim, and/or portions of Second Claim that are no longer at issue in this case following the Court's granting, in part, of Plaintiff's Demurrer and Plea in Bar. Plaintiff specifically declines to undertake any obligation to produce documents in response to open-ended requests that are not directly related to the limited portions of the Counterclaim that have survived Plaintiff's pleading challenges.

Subject to and without waiving the above-stated objections, Plaintiff will produce and/or has already produced responsive, non-privileged documents within his possession, custody, or control (if any) regarding the op-ed at issue in the above-captioned action.

72. Please produce all documents supporting, refuting, or otherwise relating to Your denial of ¶ 39 of the Counterclaim.

RESPONSE:

Plaintiff repeats and incorporates by this reference the General Objections and Objections to Definitions and Instruction above, as though set forth in full. Plaintiff further objects to this Request on the grounds that it seeks documents that are neither relevant nor reasonably calculated to lead to the discovery of admissible evidence. Plaintiff further objects to this Request on the grounds that it is overly broad and unduly burdensome taking into account the needs of the case. Plaintiff further objects to this request on the grounds that it is vague and ambiguous. Plaintiff further objects to this Request on the grounds that responsive documents are obtainable from other sources that are more convenient, less burdensome, and less expensive. Plaintiff further objects to this Request on the grounds that it seeks documents that are not within Plaintiff's possession, custody, or control. Plaintiff further objects to this request on the grounds that it is duplicative of other discovery requests and is needlessly cumulative. Plaintiff further objects to this request on the grounds that it seeks discovery for claims already dismissed by the

court in this Action. Plaintiff further objects to this Request on the grounds and to the extent that it seeks documents protected by the attorney-client privilege, work-product doctrine, or any other applicable privilege, immunity, or protection. Plaintiff further objects that this Request is overbroad and ambiguous, including because of its use of the language “supporting, refuting, or otherwise relating to.” Plaintiff further objects to this Request on the grounds that it implicates the work product doctrine, including to the extent that it seeks to intrude on the impressions and analysis of counsel as to which documents specifically “support, refute, or otherwise relate” to particular allegations in the parties’ pleadings. Plaintiff further objects to this Request on the grounds that it assumes facts and/or seeks documents evidencing a negative. Plaintiff further objects to this Request to the extent that it relates to mere statements of opinion and/or legal conclusions asserted in Defendant’s Counterclaim, as opposed to concrete factual allegations. Plaintiff further objects to this Request on the grounds and to the extent that it amounts to a demand for documents relevant to Defendant’s First Counterclaim, Third Claim, and/or portions of Second Claim that are no longer at issue in this case following the Court’s granting, in part, of Plaintiff’s Demurrer and Plea in Bar. Plaintiff specifically declines to undertake any obligation to produce documents in response to open-ended requests that are not directly related to the limited portions of the Counterclaim that have survived Plaintiff’s pleading challenges.

Subject to and without waiving the foregoing objections, Plaintiff will produce and/or has already produced responsive, non-privileged documents, if any, regarding the op-ed at issue in the above-captioned action.

73. Please produce all documents supporting, refuting, or otherwise relating to Your partial denial of ¶ 40 of the Counterclaim.

RESPONSE:

Plaintiff repeats and incorporates by this reference the General Objections and Objections to Definitions and Instruction above, as though set forth in full. Plaintiff further objects to this Request on the grounds that it seeks documents that are neither relevant nor reasonably calculated to lead to the discovery of admissible evidence. Plaintiff further objects to this Request on the grounds that it is overly broad and unduly burdensome taking into account the needs of the case. Plaintiff further objects to this request on the grounds that it is vague and ambiguous. Plaintiff further objects to this Request on the grounds that responsive documents are obtainable from other sources that are more convenient, less burdensome, and less expensive. Plaintiff further objects to this Request on the grounds that it seeks documents that are not within Plaintiff's possession, custody, or control. Plaintiff further objects to this request on the grounds that it is not reasonably tailored to the claims and defenses in this case and is harassing and overbroad. Plaintiff further objects to this request on the grounds that it is duplicative of other discovery requests and is needlessly cumulative. Plaintiff further objects to this request to the extent that it calls for a legal conclusion. Plaintiff further objects to this Request on the grounds and to the extent that it seeks documents protected by the attorney-client privilege, work-product doctrine, or any other applicable privilege, immunity, or protection. Plaintiff further objects that this Request is overbroad and ambiguous, including because of its use of the language "supporting, refuting, or otherwise relating to." Plaintiff further objects to this Request on the grounds that it implicates the work product doctrine, including to the extent that it seeks to intrude on the impressions and analysis of counsel as to which documents specifically "support, refute, or otherwise relate" to particular allegations in the parties' pleadings. Plaintiff further objects to this Request on the grounds that it assumes facts and/or seeks documents evidencing a

negative. Plaintiff further objects to this Request to the extent that it relates to mere statements of opinion and/or legal conclusions asserted in Defendant's Counterclaim, as opposed to concrete factual allegations. Plaintiff further objects to this Request on the grounds and to the extent that it amounts to a demand for documents relevant to Defendant's First Counterclaim, Third Claim, and/or portions of Second Claim that are no longer at issue in this case following the Court's granting, in part, of Plaintiff's Demurrer and Plea in Bar. Plaintiff specifically declines to undertake any obligation to produce documents in response to open-ended requests that are not directly related to the limited portions of the Counterclaim that have survived Plaintiff's pleading challenges.

Subject to and without waiving the above-stated objections, Plaintiff will produce and/or has already produced responsive, non-privileged documents within his possession, custody, or control (if any) regarding the op-ed at issue in the above-captioned action.

74. Please produce all documents supporting, refuting, or otherwise relating to Your denial of ¶ 41 of the Counterclaim.

RESPONSE:

Plaintiff repeats and incorporates by this reference the General Objections and Objections to Definitions and Instruction above, as though set forth in full. Plaintiff further objects to this Request on the grounds that it seeks documents that are neither relevant nor reasonably calculated to lead to the discovery of admissible evidence. Plaintiff further objects to this Request on the grounds that it is overly broad and unduly burdensome taking into account the needs of the case. Plaintiff further objects to this request on the grounds that it is vague and ambiguous. Plaintiff further objects to this Request on the grounds that responsive documents are obtainable from other sources that are more convenient, less burdensome, and less expensive. Plaintiff further objects to this Request to the extent that it seeks documents protected by the

attorney-client privilege, work product doctrine, and/or any other applicable privilege, immunity, or protection. Plaintiff further objects to this Request on the grounds that it seeks documents that are not within Plaintiff's possession, custody, or control. Plaintiff further objects to this request on the grounds that it is not reasonably tailored to the claims and defenses in this case and is harassing and overbroad. Plaintiff further objects to this request on the grounds that it is duplicative of other discovery requests and is needlessly cumulative. Plaintiff further objects to this request to the extent that it calls for a legal conclusion. Plaintiff further objects to this Request on the grounds and to the extent that it seeks documents protected by the attorney-client privilege, work-product doctrine, or any other applicable privilege, immunity, or protection. Plaintiff further objects that this Request is overbroad and ambiguous, including because of its use of the language "supporting, refuting, or otherwise relating to." Plaintiff further objects to this Request on the grounds that it implicates the work product doctrine, including to the extent that it seeks to intrude on the impressions and analysis of counsel as to which documents specifically "support, refute, or otherwise relate" to particular allegations in the parties' pleadings. Plaintiff further objects to this Request on the grounds that it assumes facts and/or seeks documents evidencing a negative. Plaintiff further objects to this Request to the extent that it relates to mere statements of opinion and/or legal conclusions asserted in Defendant's Counterclaim, as opposed to concrete factual allegations. Plaintiff further objects to this Request on the grounds and to the extent that it amounts to a demand for documents relevant to Defendant's First Counterclaim, Third Claim, and/or portions of Second Claim that are no longer at issue in this case following the Court's granting, in part, of Plaintiff's Demurrer and Plea in Bar. Plaintiff specifically declines to undertake any obligation to produce documents in response

to open-ended requests that are not directly related to the limited portions of the Counterclaim that have survived Plaintiff's pleading challenges.

Plaintiff will not produce any documents in response to this Request.

75. Please produce all documents supporting, refuting, or otherwise relating to Your denial of ¶ 45 of the Counterclaim.

RESPONSE:

Plaintiff repeats and incorporates by this reference the General Objections and Objections to Definitions and Instruction above, as though set forth in full. Plaintiff further objects to this Request on the grounds that it seeks documents that are neither relevant nor reasonably calculated to lead to the discovery of admissible evidence. Plaintiff further objects to this Request on the grounds that it is overly broad and unduly burdensome taking into account the needs of the case. Plaintiff further objects to this request on the grounds that it is vague and ambiguous. Plaintiff further objects to this Request on the grounds that responsive documents are obtainable from other sources that are more convenient, less burdensome, and less expensive. Plaintiff further objects to this Request to the extent that it seeks documents protected by the attorney-client privilege, work product doctrine, and/or any other applicable privilege, immunity, or protection. Plaintiff further objects to this Request on the grounds that it seeks documents that are not within Plaintiff's possession, custody, or control. Plaintiff further objects to this request on the grounds that it is not reasonably tailored to the claims and defenses in this case and is harassing and overbroad. Plaintiff further objects to this request on the grounds that it is duplicative of other discovery requests and is needlessly cumulative. Plaintiff further objects to this Request on the grounds and to the extent that it seeks documents protected by the attorney-client privilege, work-product doctrine, or any other applicable privilege, immunity, or protection. Plaintiff further objects that this Request is overbroad and ambiguous, including

because of its use of the language “supporting, refuting, or otherwise relating to.” Plaintiff further objects to this Request on the grounds that it implicates the work product doctrine, including to the extent that it seeks to intrude on the impressions and analysis of counsel as to which documents specifically “support, refute, or otherwise relate” to particular allegations in the parties’ pleadings. Plaintiff further objects to this Request on the grounds that it assumes facts and/or seeks documents evidencing a negative. Plaintiff further objects to this Request to the extent that it relates to mere statements of opinion and/or legal conclusions asserted in Defendant’s Counterclaim, as opposed to concrete factual allegations. Plaintiff further objects to this Request on the grounds and to the extent that it amounts to a demand for documents relevant to Defendant’s First Counterclaim, Third Claim, and/or portions of Second Claim that are no longer at issue in this case following the Court’s granting, in part, of Plaintiff’s Demurrer and Plea in Bar. Plaintiff specifically declines to undertake any obligation to produce documents in response to open-ended requests that are not directly related to the limited portions of the Counterclaim that have survived Plaintiff’s pleading challenges.

Plaintiff will not produce any documents in response to this Request.

76. Please produce all documents supporting, refuting, or otherwise relating to Your denial of ¶ 46 of the Counterclaim.

RESPONSE:

Plaintiff repeats and incorporates by this reference the General Objections and Objections to Definitions and Instruction above, as though set forth in full. Plaintiff further objects to this Request on the grounds that it seeks documents that are neither relevant nor reasonably calculated to lead to the discovery of admissible evidence. Plaintiff further objects to this Request on the grounds that it is overly broad and unduly burdensome taking into account the needs of the case. Plaintiff further objects to this request on the grounds that it is vague and

ambiguous. Plaintiff further objects to this Request on the grounds that responsive documents are obtainable from other sources that are more convenient, less burdensome, and less expensive. Plaintiff further objects to this Request to the extent that it seeks documents protected by the attorney-client privilege, work product doctrine, and/or any other applicable privilege, immunity, or protection. Plaintiff further objects to this Request on the grounds that it seeks documents that are not within Plaintiff's possession, custody, or control. Plaintiff further objects to this request on the grounds that it is not reasonably tailored to the claims and defenses in this case and is harassing and overbroad. Plaintiff further objects to this request on the grounds that it is duplicative of other discovery requests and is needlessly cumulative. Plaintiff further objects to this Request on the grounds and to the extent that it seeks documents protected by the attorney-client privilege, work-product doctrine, or any other applicable privilege, immunity, or protection. Plaintiff further objects that this Request is overbroad and ambiguous, including because of its use of the language "supporting, refuting, or otherwise relating to." Plaintiff further objects to this Request on the grounds that it implicates the work product doctrine, including to the extent that it seeks to intrude on the impressions and analysis of counsel as to which documents specifically "support, refute, or otherwise relate" to particular allegations in the parties' pleadings. Plaintiff further objects to this Request on the grounds that it assumes facts and/or seeks documents evidencing a negative. Plaintiff further objects to this Request to the extent that it relates to mere statements of opinion and/or legal conclusions asserted in Defendant's Counterclaim, as opposed to concrete factual allegations. Plaintiff further objects to this Request on the grounds and to the extent that it amounts to a demand for documents relevant to Defendant's First Counterclaim, Third Claim, and/or portions of Second Claim that are no longer at issue in this case following the Court's granting, in part, of Plaintiff's Demurrer and

Plea in Bar. Plaintiff specifically declines to undertake any obligation to produce documents in response to open-ended requests that are not directly related to the limited portions of the Counterclaim that have survived Plaintiff's pleading challenges.

Subject to and without waiving the foregoing objections, Plaintiff will search for and produce non-privileged documents, if any, within Plaintiff's possession, custody, or control, if any, that are relevant to the parties' claims and defenses as framed by the existing pleadings. Plaintiff specifically asserts the attorney-client privilege and work product doctrine as to communications and other documents regarding Adam Waldman, and undertakes no obligation to produce such documents.

77. Please produce all documents supporting, refuting, or otherwise relating to Your denial of ¶ 47 of the Counterclaim.

RESPONSE:

Plaintiff repeats and incorporates by this reference the General Objections and Objections to Definitions and Instruction above, as though set forth in full. Plaintiff further objects to this Request on the grounds that it seeks documents that are neither relevant nor reasonably calculated to lead to the discovery of admissible evidence. Plaintiff further objects to this Request on the grounds that it is overly broad and unduly burdensome taking into account the needs of the case. Plaintiff further objects to this request on the grounds that it is vague and ambiguous. Plaintiff further objects to this Request on the grounds that responsive documents are obtainable from other sources that are more convenient, less burdensome, and less expensive. Plaintiff further objects to this Request to the extent that it seeks documents protected by the attorney-client privilege, work product doctrine, and/or any other applicable privilege, immunity, or protection. Plaintiff further objects to this Request on the grounds that it seeks documents that are not within Plaintiff's possession, custody, or control. Plaintiff further objects to this request

on the grounds that it is not reasonably tailored to the claims and defenses in this case and is harassing and overbroad. Plaintiff further objects to this request on the grounds that it is duplicative of other discovery requests and is needlessly cumulative. Plaintiff further objects to this Request on the grounds and to the extent that it seeks documents protected by the attorney-client privilege, work-product doctrine, or any other applicable privilege, immunity, or protection. Plaintiff further objects that this Request is overbroad and ambiguous, including because of its use of the language “supporting, refuting, or otherwise relating to.” Plaintiff further objects to this Request on the grounds that it implicates the work product doctrine, including to the extent that it seeks to intrude on the impressions and analysis of counsel as to which documents specifically “support, refute, or otherwise relate” to particular allegations in the parties’ pleadings. Plaintiff further objects to this Request on the grounds that it assumes facts and/or seeks documents evidencing a negative. Plaintiff further objects to this Request to the extent that it relates to mere statements of opinion and/or legal conclusions asserted in Defendant’s Counterclaim, as opposed to concrete factual allegations. Plaintiff further objects to this Request on the grounds and to the extent that it amounts to a demand for documents relevant to Defendant’s First Counterclaim, Third Claim, and/or portions of Second Claim that are no longer at issue in this case following the Court’s granting, in part, of Plaintiff’s Demurrer and Plea in Bar. Plaintiff specifically declines to undertake any obligation to produce documents in response to open-ended requests that are not directly related to the limited portions of the Counterclaim that have survived Plaintiff’s pleading challenges.

78. Subject to and without waiving the foregoing objections, Plaintiff will search for and produce non-privileged documents, if any, within Plaintiff’s possession, custody, or control, if any, that are relevant to the parties’ claims and defenses as framed by the existing pleadings. Plaintiff specifically asserts the attorney-client privilege and work product doctrine as to communications and other documents regarding Adam Waldman,

and undertakes no obligation to produce such documents. Please produce all documents supporting, refuting, or otherwise relating to Your denial of ¶ 48 of the Counterclaim.

RESPONSE:

Plaintiff repeats and incorporates by this reference the General Objections and Objections to Definitions and Instruction above, as though set forth in full. Plaintiff further objects to this Request on the grounds that it seeks documents that are neither relevant nor reasonably calculated to lead to the discovery of admissible evidence. Plaintiff further objects to this Request on the grounds that it is overly broad and unduly burdensome taking into account the needs of the case. Plaintiff further objects to this request on the grounds that it is vague and ambiguous. Plaintiff further objects to this Request on the grounds that responsive documents are obtainable from other sources that are more convenient, less burdensome, and less expensive. Plaintiff further objects to this Request to the extent that it seeks documents protected by the attorney-client privilege, work product doctrine, and/or any other applicable privilege, immunity, or protection. Plaintiff further objects to this Request on the grounds that it seeks documents that are not within Plaintiff's possession, custody, or control. Plaintiff further objects to this request on the grounds that it is not reasonably tailored to the claims and defenses in this case and is harassing and overbroad. Plaintiff further objects to this request on the grounds that it is duplicative of other discovery requests and is needlessly cumulative. Plaintiff further objects to this request on the grounds that it seeks discovery for claims already dismissed by the court in this Action. Plaintiff further objects to this Request on the grounds and to the extent that it seeks documents protected by the attorney-client privilege, work-product doctrine, or any other applicable privilege, immunity, or protection. Plaintiff further objects that this Request is overbroad and ambiguous, including because of its use of the language "supporting, refuting, or otherwise relating to." Plaintiff further objects to this Request on the grounds that it implicates

the work product doctrine, including to the extent that it seeks to intrude on the impressions and analysis of counsel as to which documents specifically “support, refute, or otherwise relate” to particular allegations in the parties’ pleadings. Plaintiff further objects to this Request on the grounds that it assumes facts and/or seeks documents evidencing a negative. Plaintiff further objects to this Request to the extent that it relates to mere statements of opinion and/or legal conclusions asserted in Defendant’s Counterclaim, as opposed to concrete factual allegations. Plaintiff further objects to this Request on the grounds and to the extent that it amounts to a demand for documents relevant to Defendant’s First Counterclaim, Third Claim, and/or portions of Second Claim that are no longer at issue in this case following the Court’s granting, in part, of Plaintiff’s Demurrer and Plea in Bar. Plaintiff specifically declines to undertake any obligation to produce documents in response to open-ended requests that are not directly related to the limited portions of the Counterclaim that have survived Plaintiff’s pleading challenges.

Subject to and without waiving the foregoing objections, Plaintiff will search for and produce non-privileged documents, if any, within Plaintiff’s possession, custody, or control, if any, that are relevant to the parties’ claims and defenses as framed by the existing pleadings. Plaintiff specifically asserts the attorney-client privilege and work product doctrine as to communications and other documents regarding Adam Waldman, and undertakes no obligation to produce such documents.

79. Please produce all documents supporting, refuting, or otherwise relating to Your denial of ¶ 49 of the Counterclaim.

RESPONSE:

Plaintiff repeats and incorporates by this reference the General Objections and Objections to Definitions and Instruction above, as though set forth in full. Plaintiff further objects to this Request on the grounds that it seeks documents that are neither relevant nor reasonably

calculated to lead to the discovery of admissible evidence. Plaintiff further objects to this Request on the grounds that it is overly broad and unduly burdensome taking into account the needs of the case. Plaintiff further objects to this request on the grounds that it is vague and ambiguous. Plaintiff further objects to this Request on the grounds that responsive documents are obtainable from other sources that are more convenient, less burdensome, and less expensive. Plaintiff further objects to this Request to the extent that it seeks documents protected by the attorney-client privilege, work product doctrine, and/or any other applicable privilege, immunity, or protection. Plaintiff further objects to this Request on the grounds that it seeks documents that are not within Plaintiff's possession, custody, or control. Plaintiff further objects to this request on the grounds that it is not reasonably tailored to the claims and defenses in this case and is harassing and overbroad. Plaintiff further objects to this request on the grounds that it is duplicative of other discovery requests and is needlessly cumulative. Plaintiff further objects to this request on the grounds that it seeks discovery for claims already dismissed by the court in this Action. Plaintiff further objects to this Request on the grounds and to the extent that it seeks documents protected by the attorney-client privilege, work-product doctrine, or any other applicable privilege, immunity, or protection. Plaintiff further objects that this Request is overbroad and ambiguous, including because of its use of the language "supporting, refuting, or otherwise relating to." Plaintiff further objects to this Request on the grounds that it implicates the work product doctrine, including to the extent that it seeks to intrude on the impressions and analysis of counsel as to which documents specifically "support, refute, or otherwise relate" to particular allegations in the parties' pleadings. Plaintiff further objects to this Request on the grounds that it assumes facts and/or seeks documents evidencing a negative. Plaintiff further objects to this Request to the extent that it relates to mere statements of opinion and/or legal

conclusions asserted in Defendant's Counterclaim, as opposed to concrete factual allegations. Plaintiff further objects to this Request on the grounds and to the extent that it amounts to a demand for documents relevant to Defendant's First Counterclaim, Third Claim, and/or portions of Second Claim that are no longer at issue in this case following the Court's granting, in part, of Plaintiff's Demurrer and Plea in Bar. Plaintiff specifically declines to undertake any obligation to produce documents in response to open-ended requests that are not directly related to the limited portions of the Counterclaim that have survived Plaintiff's pleading challenges.

Subject to and without waiving the foregoing objections, Plaintiff will search for and produce non-privileged documents, if any, within Plaintiff's possession, custody, or control, if any, that are relevant to the parties' claims and defenses as framed by the existing pleadings. Plaintiff specifically asserts the attorney-client privilege and work product doctrine as to communications and other documents regarding Adam Waldman, and undertakes no obligation to produce such documents.

80. Please produce all documents supporting, refuting, or otherwise relating to Your denial of ¶ 50 of the Counterclaim, including your denial of the allegation that "the date of the picture" was "false and defamatory."

RESPONSE:

Plaintiff repeats and incorporates by this reference the General Objections and Objections to Definitions and Instruction above, as though set forth in full. Plaintiff further objects to this Request on the grounds that it seeks documents that are neither relevant nor reasonably calculated to lead to the discovery of admissible evidence. Plaintiff further objects to this Request on the grounds that it is overly broad and unduly burdensome taking into account the needs of the case. Plaintiff further objects to this request on the grounds that it is vague and ambiguous. Plaintiff further objects to this Request on the grounds that responsive documents are

obtainable from other sources that are more convenient, less burdensome, and less expensive. Plaintiff further objects to this Request to the extent that it seeks documents protected by the attorney-client privilege, work product doctrine, and/or any other applicable privilege, immunity, or protection. Plaintiff further objects to this Request on the grounds that it seeks documents that are not within Plaintiff's possession, custody, or control. Plaintiff further objects to this request on the grounds that it is not reasonably tailored to the claims and defenses in this case and is harassing and overbroad. Plaintiff further objects to this request on the grounds that it is duplicative of other discovery requests and is needlessly cumulative. Plaintiff further objects to this request on the grounds that it seeks discovery for claims already dismissed by the court in this Action. Plaintiff further objects to this Request on the grounds and to the extent that it seeks documents protected by the attorney-client privilege, work-product doctrine, or any other applicable privilege, immunity, or protection. Plaintiff further objects that this Request is overbroad and ambiguous, including because of its use of the language "supporting, refuting, or otherwise relating to." Plaintiff further objects to this Request on the grounds that it implicates the work product doctrine, including to the extent that it seeks to intrude on the impressions and analysis of counsel as to which documents specifically "support, refute, or otherwise relate" to particular allegations in the parties' pleadings. Plaintiff further objects to this Request on the grounds that it assumes facts and/or seeks documents evidencing a negative. Plaintiff further objects to this Request to the extent that it relates to mere statements of opinion and/or legal conclusions asserted in Defendant's Counterclaim, as opposed to concrete factual allegations. Plaintiff further objects to this Request on the grounds and to the extent that it amounts to a demand for documents relevant to Defendant's First Counterclaim, Third Claim, and/or portions of Second Claim that are no longer at issue in this case following the Court's granting, in part, of

Plaintiff's Demurrer and Plea in Bar. Plaintiff specifically declines to undertake any obligation to produce documents in response to open-ended requests that are not directly related to the limited portions of the Counterclaim that have survived Plaintiff's pleading challenges.

Subject to and without waiving the foregoing objections, Plaintiff will search for and produce non-privileged documents, if any, within Plaintiff's possession, custody, or control, if any, that are relevant to the parties' claims and defenses as framed by the existing pleadings. Plaintiff specifically asserts the attorney-client privilege and work product doctrine as to communications and other documents regarding Adam Waldman, and undertakes no obligation to produce such documents.

81. Please produce all documents supporting, refuting, or otherwise relating to Your denial of ¶ 51 of the Counterclaim.

RESPONSE:

Plaintiff repeats and incorporates by this reference the General Objections and Objections to Definitions and Instruction above, as though set forth in full. Plaintiff further objects to this Request on the grounds that it seeks documents that are neither relevant nor reasonably calculated to lead to the discovery of admissible evidence. Plaintiff further objects to this Request on the grounds that it is overly broad and unduly burdensome taking into account the needs of the case. Plaintiff further objects to this request on the grounds that it is vague and ambiguous. Plaintiff further objects to this Request on the grounds that responsive documents are obtainable from other sources that are more convenient, less burdensome, and less expensive. Plaintiff further objects to this Request to the extent that it seeks documents protected by the attorney-client privilege, work product doctrine, and/or any other applicable privilege, immunity, or protection. Plaintiff further objects to this Request on the grounds that it seeks documents that are not within Plaintiff's possession, custody, or control. Plaintiff further objects to this request

on the grounds that it is not reasonably tailored to the claims and defenses in this case and is harassing and overbroad. Plaintiff further objects to this request on the grounds that it is duplicative of other discovery requests and is needlessly cumulative. Plaintiff further objects to this Request on the grounds and to the extent that it seeks documents protected by the attorney-client privilege, work-product doctrine, or any other applicable privilege, immunity, or protection. Plaintiff further objects that this Request is overbroad and ambiguous, including because of its use of the language “supporting, refuting, or otherwise relating to.” Plaintiff further objects to this Request on the grounds that it implicates the work product doctrine, including to the extent that it seeks to intrude on the impressions and analysis of counsel as to which documents specifically “support, refute, or otherwise relate” to particular allegations in the parties’ pleadings. Plaintiff further objects to this Request on the grounds that it assumes facts and/or seeks documents evidencing a negative. Plaintiff further objects to this Request to the extent that it relates to mere statements of opinion and/or legal conclusions asserted in Defendant’s Counterclaim, as opposed to concrete factual allegations. Plaintiff further objects to this Request on the grounds and to the extent that it amounts to a demand for documents relevant to Defendant’s First Counterclaim, Third Claim, and/or portions of Second Claim that are no longer at issue in this case following the Court’s granting, in part, of Plaintiff’s Demurrer and Plea in Bar. Plaintiff specifically declines to undertake any obligation to produce documents in response to open-ended requests that are not directly related to the limited portions of the Counterclaim that have survived Plaintiff’s pleading challenges.

Plaintiff will not produce any documents in response to this Request.

82. Please produce all documents supporting, refuting, or otherwise relating to Your denial of ¶ 52 of the Counterclaim.

RESPONSE:

Plaintiff repeats and incorporates by this reference the General Objections and Objections to Definitions and Instruction above, as though set forth in full. Plaintiff further objects to this Request on the grounds that it seeks documents that are neither relevant nor reasonably calculated to lead to the discovery of admissible evidence. Plaintiff further objects to this Request on the grounds that it is overly broad and unduly burdensome taking into account the needs of the case. Plaintiff further objects to this request on the grounds that it is vague and ambiguous. Plaintiff further objects to this Request on the grounds that responsive documents are obtainable from other sources that are more convenient, less burdensome, and less expensive. Plaintiff further objects to this Request to the extent that it seeks documents protected by the attorney-client privilege, work product doctrine, and/or any other applicable privilege, immunity, or protection. Plaintiff further objects to this Request on the grounds that it seeks documents that are not within Plaintiff's possession, custody, or control. Plaintiff further objects to this request on the grounds that it is not reasonably tailored to the claims and defenses in this case and is harassing and overbroad. Plaintiff further objects to this request on the grounds that it is duplicative of other discovery requests and is needlessly cumulative. Plaintiff further objects to this request to the extent that it calls for a legal conclusion. Plaintiff further objects to this Request on the grounds and to the extent that it seeks documents protected by the attorney-client privilege, work-product doctrine, or any other applicable privilege, immunity, or protection. Plaintiff further objects that this Request is overbroad and ambiguous, including because of its use of the language "supporting, refuting, or otherwise relating to." Plaintiff further objects to this Request on the grounds that it implicates the work product doctrine, including to the extent that it seeks to intrude on the impressions and analysis of counsel as to which documents

specifically “support, refute, or otherwise relate” to particular allegations in the parties’ pleadings. Plaintiff further objects to this Request on the grounds that it assumes facts and/or seeks documents evidencing a negative. Plaintiff further objects to this Request to the extent that it relates to mere statements of opinion and/or legal conclusions asserted in Defendant’s Counterclaim, as opposed to concrete factual allegations. Plaintiff further objects to this Request on the grounds and to the extent that it amounts to a demand for documents relevant to Defendant’s First Counterclaim, Third Claim, and/or portions of Second Claim that are no longer at issue in this case following the Court’s granting, in part, of Plaintiff’s Demurrer and Plea in Bar. Plaintiff specifically declines to undertake any obligation to produce documents in response to open-ended requests that are not directly related to the limited portions of the Counterclaim that have survived Plaintiff’s pleading challenges.

Subject to and without waiving the foregoing objections, Plaintiff will search for and produce non-privileged documents, if any, within Plaintiff’s possession, custody, or control, if any, that are relevant to the parties’ claims and defenses as framed by the existing pleadings. Plaintiff specifically asserts the attorney-client privilege and work product doctrine as to communications and other documents regarding Adam Waldman, and undertakes no obligation to produce such documents.

83. Please produce all documents supporting, refuting, or otherwise relating to Your denial of ¶ 66(d)-(f) of the Counterclaim.

RESPONSE:

Plaintiff repeats and incorporates by this reference the General Objections and Objections to Definitions and Instruction above, as though set forth in full. Plaintiff further objects to this Request on the grounds that it seeks documents that are neither relevant nor reasonably calculated to lead to the discovery of admissible evidence. Plaintiff further objects to this

Request on the grounds that it is overly broad and unduly burdensome taking into account the needs of the case. Plaintiff further objects to this request on the grounds that it is vague and ambiguous. Plaintiff further objects to this Request on the grounds that responsive documents are obtainable from other sources that are more convenient, less burdensome, and less expensive. Plaintiff further objects to this Request to the extent that it seeks documents protected by the attorney-client privilege, work product doctrine, and/or any other applicable privilege, immunity, or protection. Plaintiff further objects to this Request on the grounds that it seeks documents that are not within Plaintiff's possession, custody, or control. Plaintiff further objects to this request on the grounds that it is not reasonably tailored to the claims and defenses in this case and is harassing and overbroad. Plaintiff further objects to this request on the grounds that it is duplicative of other discovery requests and is needlessly cumulative. Plaintiff further objects to this Request on the grounds and to the extent that it seeks documents protected by the attorney-client privilege, work-product doctrine, or any other applicable privilege, immunity, or protection. Plaintiff further objects that this Request is overbroad and ambiguous, including because of its use of the language "supporting, refuting, or otherwise relating to." Plaintiff further objects to this Request on the grounds that it implicates the work product doctrine, including to the extent that it seeks to intrude on the impressions and analysis of counsel as to which documents specifically "support, refute, or otherwise relate" to particular allegations in the parties' pleadings. Plaintiff further objects to this Request on the grounds that it assumes facts and/or seeks documents evidencing a negative. Plaintiff further objects to this Request to the extent that it relates to mere statements of opinion and/or legal conclusions asserted in Defendant's Counterclaim, as opposed to concrete factual allegations. Plaintiff further objects to this Request on the grounds and to the extent that it amounts to a demand for documents relevant

to Defendant's First Counterclaim, Third Claim, and/or portions of Second Claim that are no longer at issue in this case following the Court's granting, in part, of Plaintiff's Demurrer and Plea in Bar. Plaintiff specifically declines to undertake any obligation to produce documents in response to open-ended requests that are not directly related to the limited portions of the Counterclaim that have survived Plaintiff's pleading challenges.

Plaintiff will not produce any documents in response to this Request.

84. Please produce all documents supporting, refuting, or otherwise relating to Your denial of ¶ 67 of the Counterclaim.

RESPONSE:

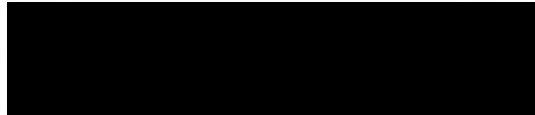
Plaintiff repeats and incorporates by this reference the General Objections and Objections to Definitions and Instruction above, as though set forth in full. Plaintiff further objects to this Request on the grounds that it seeks documents that are neither relevant nor reasonably calculated to lead to the discovery of admissible evidence. Plaintiff further objects to this Request on the grounds that it is overly broad and unduly burdensome taking into account the needs of the case. Plaintiff further objects to this request on the grounds that it is vague and ambiguous. Plaintiff further objects to this Request on the grounds that responsive documents are obtainable from other sources that are more convenient, less burdensome, and less expensive. Plaintiff further objects to this Request to the extent that it seeks documents protected by the attorney-client privilege, work product doctrine, and/or any other applicable privilege, immunity, or protection. Plaintiff further objects to this Request on the grounds that it seeks documents that are not within Plaintiff's possession, custody, or control. Plaintiff further objects to this request on the grounds that it is not reasonably tailored to the claims and defenses in this case and is harassing and overbroad. Plaintiff further objects to this request on the grounds that it is duplicative of other discovery requests and is needlessly cumulative. Plaintiff further objects to

CERTIFICATE OF SERVICE

I hereby certify that on this 16th day of February 2021, I caused copies of the foregoing to be served via email (per written agreement between the Parties) on the following:

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
brottenborn@woodsrogers.com
jtreece@woodsrogers.com

Elaine Charlson Bredehoft (VSB No. 23766)
Carla D. Brown (VSB No. 44803)
Adam S. Nadelhaft (VSB No. 91717)
David E. Murphy (VSB No. 90938)
CHARLSON BREDEHOFT COHEN &
BROWN, P.C.
11260 Roger Bacon Dr., Suite 201
Reston, VA 20190
Phone: 703-318-6800
Fax: 703-318-6808
ebredehoft@cbcblaw.com
cbrown@cbcblaw.com
anadelhaft@cbcblaw.com
dmurphy@cbcblaw.com


Benjamin G. Chew

RESPONSE: No objection.

o. ***Fantastic Beasts Films.*** The phrase “Fantastic Beasts Films” collectively refers to the films “Fantastic Beasts and Where to Find Them,” “Fantastic Beasts: The Crimes of Grindelwald,” and the tentatively titled “Fantastic Beasts and Where to Find Them 3,” along with any other future film in this series referred to in any contract such as Fantastic Beasts and Where to Find Them 4 and Fantastic Beasts and Where to Find Them 5.

RESPONSE: No objection.

p. ***Disney.*** The phrase “Disney” refers to the Walt Disney Company and any of its divisions, parents, subsidiaries, related or affiliated companies or organizations.

RESPONSE: No objection.

REQUESTS

1. Please produce all contracts or other communications reflecting or otherwise relating to any obligations, plans, issues, complaints, concerns, termination, and compensation to/for Mr. Depp for any relationship, marketing campaign, or advertising campaign with Christian Dior (including any campaign for Sauvage) from January 1, 2010 to the present.

RESPONSE:

Plaintiff repeats and incorporates by this reference the General Objections and Objections to Definitions and Instruction above, as though set forth in full. Plaintiff further objects to this Request on the grounds that it seeks documents that are neither relevant nor reasonably calculated to lead to the discovery of admissible evidence. Plaintiff further objects to this Request on the grounds that it is overly broad and unduly burdensome taking into account the needs of the case. Plaintiff further objects to this Request as harassing because it seeks information unrelated to the subject matter of this case. Plaintiff further objects to this Request on the grounds that it seeks confidential, proprietary, and private personal and/or business

information of Plaintiff and/or third parties to this litigation, which is not subject to discovery in this action. Plaintiff further objects to this Request to the extent that it seeks documents protected by the attorney-client privilege, work product doctrine, and/or any other applicable privilege, immunity, or protection. Plaintiff further objects to this request on the grounds that the terms “obligations, plans, issues, complaints, concerns” are vague and ambiguous. Plaintiff further objects to this request on the grounds that it is lacking in reasonable particularity. Plaintiff further objects to this request on the grounds that it is not reasonably tailored to the claims and defenses in this case and is harassing and overbroad.

Subject to and without waiver of the foregoing objections, Plaintiff will produce and/or has already produced documents sufficient to show compensation to/for Mr. Depp for any relationship, marketing campaign, or advertising campaign with Christian Dior.

2. For each Request for Admission in Ms. Heard's First Set of Requests for Admission that you denied either in whole or in part, please provide all documents supporting, refuting, reflecting, or otherwise relating to such denial.

RESPONSE:

Plaintiff repeats and incorporates by this reference the General Objections and Objections to Definitions and Instruction above, as though set forth in full. Plaintiff further objects to this Request on the grounds that it is overly broad and unduly burdensome taking into account the needs of the case, as to both time and scope. Plaintiff further objects to this Request on the grounds that it seeks confidential, proprietary, and private personal and/or business information of Plaintiff and/or third parties to this litigation, which is not subject to discovery in this action. Plaintiff further objects to this Request on the grounds that responsive documents are obtainable from other sources that are more convenient, less burdensome, and less expensive. Plaintiff further objects to this Request on the grounds that it seeks documents that are not within

Plaintiff's possession, custody or control. Plaintiff further objects to this Request to the extent that it seeks documents protected by the attorney-client privilege, work product doctrine, and/or any other applicable privilege, immunity, or protection. Plaintiff further objects to this request on the grounds that it is vague and ambiguous. Plaintiff further objects to this request on the grounds that it seeks documents that are neither relevant nor reasonably calculated to lead to the discovery of admissible evidence. Plaintiff further objects to the request on the grounds that it fails to reasonably particularize or describe the categories of documents sought.

Plaintiff will not produce documents in response to this request as currently posed.

3. For each Request for Admission in Ms. Heard's Second Set of Requests for Admission that you denied either in whole or in part, please provide all documents supporting, refuting, reflecting, or otherwise relating to such denial.

RESPONSE:

Plaintiff repeats and incorporates by this reference the General Objections and Objections to Definitions and Instruction above, as though set forth in full. Plaintiff further objects to this Request on the grounds that it is overly broad and unduly burdensome taking into account the needs of the case, as to both time and scope. Plaintiff further objects to this Request on the grounds that it seeks confidential, proprietary, and private personal and/or business information of Plaintiff and/or third parties to this litigation, which is not subject to discovery in this action. Plaintiff further objects to this Request on the grounds that responsive documents are obtainable from other sources that are more convenient, less burdensome, and less expensive. Plaintiff further objects to this Request on the grounds that it seeks documents that are not within Plaintiff's possession, custody or control. Plaintiff further objects to this Request to the extent that it seeks documents protected by the attorney-client privilege, work product doctrine, and/or any other applicable privilege, immunity, or protection. Plaintiff further objects to this request

on the grounds that it is vague and ambiguous. Plaintiff further objects to this request on the grounds that it seeks documents that are neither relevant nor reasonably calculated to lead to the discovery of admissible evidence. Plaintiff further objects to the request on the grounds that it fails to reasonably particularize or describe the categories of documents sought.

Plaintiff will not produce documents in response to this request as currently posed.

4. For each Request for Admission in Ms. Heard's Third Set of Requests for Admission that you denied either in whole or in part, please provide all documents supporting, refuting, reflecting, or otherwise relating to such denial.

RESPONSE:

Plaintiff repeats and incorporates by this reference the General Objections and Objections to Definitions and Instruction above, as though set forth in full. Plaintiff further objects to this Request on the grounds that it is overly broad and unduly burdensome taking into account the needs of the case, as to both time and scope. Plaintiff further objects to this Request on the grounds that it seeks confidential, proprietary, and private personal and/or business information of Plaintiff and/or third parties to this litigation, which is not subject to discovery in this action. Plaintiff further objects to this Request on the grounds that responsive documents are obtainable from other sources that are more convenient, less burdensome, and less expensive. Plaintiff further objects to this Request on the grounds that it seeks documents that are not within Plaintiff's possession, custody or control. Plaintiff further objects to this Request to the extent that it seeks documents protected by the attorney-client privilege, work product doctrine, and/or any other applicable privilege, immunity, or protection. Plaintiff further objects to this request on the grounds that it is vague and ambiguous. Plaintiff further objects to this request on the grounds that it seeks documents that are neither relevant nor reasonably calculated to lead to the

discovery of admissible evidence. Plaintiff further objects to the request on the grounds that it fails to reasonably particularize or describe the categories of documents sought.

Plaintiff will not produce documents in response to this request as currently posed.

5. For each Request for Admission in Ms. Heard's Fourth Set of Requests for Admission that you denied either in whole or in part, please provide all documents supporting, refuting, reflecting, or otherwise relating to such denial.

RESPONSE:

Plaintiff repeats and incorporates by this reference the General Objections and Objections to Definitions and Instruction above, as though set forth in full. Plaintiff further objects to this Request on the grounds that it is overly broad and unduly burdensome taking into account the needs of the case, as to both time and scope. Plaintiff further objects to this Request on the grounds that it seeks confidential, proprietary, and private personal and/or business information of Plaintiff and/or third parties to this litigation, which is not subject to discovery in this action. Plaintiff further objects to this Request on the grounds that responsive documents are obtainable from other sources that are more convenient, less burdensome, and less expensive. Plaintiff further objects to this Request on the grounds that it seeks documents that are not within Plaintiff's possession, custody or control. Plaintiff further objects to this Request to the extent that it seeks documents protected by the attorney-client privilege, work product doctrine, and/or any other applicable privilege, immunity, or protection. Plaintiff further objects to this request on the grounds that it is vague and ambiguous. Plaintiff further objects to this request on the grounds that it seeks documents that are neither relevant nor reasonably calculated to lead to the discovery of admissible evidence. Plaintiff further objects to the request on the grounds that it fails to reasonably particularize or describe the categories of documents sought.

Plaintiff will not produce documents in response to this request as currently posed.

6. For each Request for Admission in Ms. Heard's Fifth Set of Requests for Admission that you denied either in whole or in part, please provide all documents supporting, refuting, reflecting, or otherwise relating to such denial.

RESPONSE:

Plaintiff repeats and incorporates by this reference the General Objections and Objections to Definitions and Instruction above, as though set forth in full. Plaintiff further objects to this Request on the grounds that it is overly broad and unduly burdensome taking into account the needs of the case, as to both time and scope. Plaintiff further objects to this Request on the grounds that it seeks confidential, proprietary, and private personal and/or business information of Plaintiff and/or third parties to this litigation, which is not subject to discovery in this action. Plaintiff further objects to this Request on the grounds that responsive documents are obtainable from other sources that are more convenient, less burdensome, and less expensive. Plaintiff further objects to this Request on the grounds that it seeks documents that are not within Plaintiff's possession, custody or control. Plaintiff further objects to this Request to the extent that it seeks documents protected by the attorney-client privilege, work product doctrine, and/or any other applicable privilege, immunity, or protection. Plaintiff further objects to this request on the grounds that it is vague and ambiguous. Plaintiff further objects to this request on the grounds that it seeks documents that are neither relevant nor reasonably calculated to lead to the discovery of admissible evidence. Plaintiff further objects to the request on the grounds that it fails to reasonably particularize or describe the categories of documents sought.

Plaintiff will not produce documents in response to this request as currently posed.

7. Please produce all documents supporting, refuting, or otherwise relating to any of Your responses to Ms. Heard's First Set of Interrogatories.

RESPONSE:

Plaintiff repeats and incorporates by this reference the General Objections and Objections to Definitions and Instruction above, as though set forth in full. Plaintiff further objects to this Request on the grounds that it is overly broad and unduly burdensome taking into account the needs of the case, as to both time and scope. Plaintiff further objects to this Request on the grounds that it seeks confidential, proprietary, and private personal and/or business information of Plaintiff and/or third parties to this litigation, which is not subject to discovery in this action. Plaintiff further objects to this Request on the grounds that responsive documents are obtainable from other sources that are more convenient, less burdensome, and less expensive. Plaintiff further objects to this Request on the grounds that it seeks documents that are not within Plaintiff's possession, custody or control. Plaintiff further objects to this Request to the extent that it seeks documents protected by the attorney-client privilege, work product doctrine, and/or any other applicable privilege, immunity, or protection. Plaintiff further objects to this request on the grounds that it is vague and ambiguous. Plaintiff further objects to this request on the grounds that it seeks documents that are neither relevant nor reasonably calculated to lead to the discovery of admissible evidence. Plaintiff further objects to the request on the grounds that it fails to reasonably particularize or describe the categories of documents sought.

Plaintiff will not produce documents in response to this request as currently posed.

8. Please produce all documents supporting, refuting, or otherwise relating to any of Your responses to Ms. Heard's Second Set of Interrogatories.

RESPONSE:

Plaintiff repeats and incorporates by this reference the General Objections and Objections to Definitions and Instruction above, as though set forth in full. Plaintiff further objects to this Request on the grounds that it is overly broad and unduly burdensome taking into account the

needs of the case, as to both time and scope. Plaintiff further objects to this Request on the grounds that it seeks confidential, proprietary, and private personal and/or business information of Plaintiff and/or third parties to this litigation, which is not subject to discovery in this action. Plaintiff further objects to this Request on the grounds that responsive documents are obtainable from other sources that are more convenient, less burdensome, and less expensive. Plaintiff further objects to this Request on the grounds that it seeks documents that are not within Plaintiff's possession, custody or control. Plaintiff further objects to this Request to the extent that it seeks documents protected by the attorney-client privilege, work product doctrine, and/or any other applicable privilege, immunity, or protection. Plaintiff further objects to this request on the grounds that it is vague and ambiguous. Plaintiff further objects to this request on the grounds that it seeks documents that are neither relevant nor reasonably calculated to lead to the discovery of admissible evidence. Plaintiff further objects to the request on the grounds that it fails to reasonably particularize or describe the categories of documents sought.

Plaintiff will not produce documents in response to this request as currently posed.

9. Please produce all documents sufficient to identify all of Mr. Depp's donations to any charitable organizations from 2010 to the present, including any documents referring to any time given or donated by Mr. Depp to any charitable organizations even if no monetary donation was involved.

RESPONSE:

Plaintiff repeats and incorporates by this reference the General Objections and Objections to Definitions and Instruction above, as though set forth in full. Plaintiff further objects to this Request on the grounds that it seeks documents that are neither relevant nor reasonably calculated to lead to the discovery of admissible evidence. Plaintiff further objects to this Request on the grounds that it is overly broad and unduly burdensome taking into account the needs of the case. Plaintiff further objects to this Request as harassing because it seeks

information unrelated to the subject matter of this case. Plaintiff further objects to this Request on the grounds that it seeks confidential, proprietary, and private personal and/or business information of Plaintiff and/or third parties to this litigation, which is not subject to discovery in this action. Plaintiff further objects to this Request to the extent that it seeks documents protected by the attorney-client privilege, work product doctrine, and/or any other applicable privilege, immunity, or protection. Plaintiff further objects to this request on the grounds that it is vague and ambiguous. Plaintiff further objects to this request on the grounds that it is lacking in reasonable particularity. Plaintiff further objects to this request on the grounds that it is not reasonably tailored to the claims and defenses in this case and is harassing and overbroad.

Plaintiff will not produce any documents in response to this Request.

Dated: March 1, 2021

Respectfully submitted,



Benjamin G. Chew (VSB #29113)
Andrew C. Crawford (VSB #89093)
BROWN RUDNICK, LLP
601 Thirteenth Street NW, Suite 600
Washington, DC 20005
Phone: (202) 536-1785
Fax: (617) 289-0717
bchew@brownrudnick.com
acrawford@brownrudnick.com

Leo J. Presiado (*pro hac vice*)
Camille M. Vasquez (*pro hac vice*)
BROWN RUDNICK, LLP
2211 Michelson Drive, Seventh Floor
Irvine, CA 92612
Phone: (949) 752-7100
Fax: (949) 252-1514

lpresiado@brownrudnick.com
cvasquez@brownrudnick.com

Jessica N. Meyers (*pro hac vice*)
BROWN RUDNICK LLP
7 Times Square
New York, New York 10036
Phone: (212) 209-4938
Fax: (212) 209-4801
jmeyers@brownrudnick.com

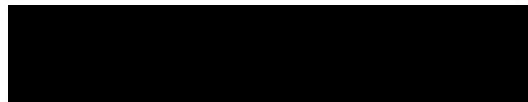
*Counsel for Plaintiff and
Counterclaim Defendant John C. Depp, II*

CERTIFICATE OF SERVICE

I hereby certify that on this 1st day of March 2021, I caused copies of the foregoing to be served via email (per written agreement between the Parties) on the following:

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
brottenborn@woodsrogers.com
jtreece@woodsrogers.com

Elaine Charlson Bredehoft (VSB No. 23766)
Carla D. Brown (VSB No. 44803)
Adam S. Nadelhaft (VSB No. 91717)
David E. Murphy (VSB No. 90938)
CHARLSON BREDEHOFT COHEN &
BROWN, P.C.
11260 Roger Bacon Dr., Suite 201
Reston, VA 20190
Phone: 703-318-6800
Fax: 703-318-6808
ebredehoft@cbcblaw.com
cbrown@cbcblaw.com
anadelhaft@cbcblaw.com
dmurphy@cbcblaw.com



Benjamin G. Chew

VIRGINIA:

IN THE CIRCUIT COURT OF FAIRFAX COUNTY

JOHN C. DEPP, II,

Plaintiff,

v.

AMBER LAURA HEARD,

Defendant.

Civil Action No.: CL-2019-0002911

FILED
MOTIONS DOCKET
2021 APR 19 PM 2:38
JOHN T. FREY
CLERK, CIRCUIT COURT
FAIRFAX, VA

AMENDED ANSWER AND GROUNDS OF DEFENSE

Defendant Amber Laura Heard, by counsel, hereby files this Amended Answer and Grounds of Defense to the Complaint filed by Plaintiff John C. Depp, II. Defendant denies all allegations in the Complaint that are not specifically and expressly admitted below.

ANSWER

NATURE OF ACTION

1. With respect to ¶ 1 of the Complaint,¹ Defendant admits that she wrote, with the assistance and advice of others, the op-ed attached to the Complaint as Exhibit B and that it was published in the Washington Post on page A21 on December 19, 2018. Answering further, Defendant states that the op-ed speaks for itself and the document reflects a complete and accurate statement of its contents. Defendant denies any mischaracterization of the op-ed and denies the remaining allegations in ¶ 1. Defendant specifically denies that she defamed Plaintiff or made false statements or implications in the op-ed relating to Plaintiff.

2. With respect to ¶ 2, Defendant admits that the Superior Court of California, County of Los Angeles issued a Temporary Restraining Order against Plaintiff to restrain

¹All references to paragraphs (“¶”) are referencing the paragraphs of the Complaint dated March 1, 2019. Going forward, the references will be to ¶ without stating Complaint.

GROUNDS OF DEFENSE
(Affirmative and Other Defenses)

1. Plaintiff's Complaint fails to state a claim upon which relief can be granted and requests relief which is not permitted as a matter of law.

2. The Op-Ed was not false and defamatory because any statements this Court has held relate to Plaintiff were true.

3. Plaintiff is a public figure, and any defamatory statements in the Op-Ed were not made with actual malice.

4. Defendant relied upon counsel in writing and publishing the Op-Ed. Therefore, there can be no malice as a matter of law, and therefore no action for Defamation.

5. The statements in the op-ed are expressions of opinion that are protected by the First Amendment to the United States Constitution and Article I, Section 12 of the Constitution of Virginia. Defendant requests an award of her reasonable attorneys' fees and costs pursuant to Virginia's Anti-SLAPP Statute, including § 8.01-223.2, and/or any amendments thereto. Pursuant to Virginia Supreme Court Rule 3:25, Defendant requests this Court establish a procedure post trial for the submission of Defendant's attorneys' fees and costs under Rule 3:25(d) of the Rules of the Virginia Supreme Court of Virginia.

6. **Any alleged injuries suffered by Plaintiff were not caused by Defendant, but instead were caused by Plaintiff's negligence, conduct, actions, or inactions, or were as a result of other alternative causes, or a combination thereof**

7. **Plaintiff's claims and alleged damages are barred by his failure to mitigate his damages.**

8. Plaintiff is barred from recovery based on the Doctrine of Unclean Hands.

Judgments and Orders are further entitled to full faith and credit in Virginia, are enforceable and should be recognized in the same manner and to the same extent as if rendered in Virginia. Va. Code § 8.01-465.13:5-6. Pursuant to Rule 3:11 of the Rules of the Supreme Court of Virginia, a written reply to this paragraph is expressly requested.

Defendant reserves the right to raise further defenses, as the evidence develops and warrants.

WHEREFORE, Defendant respectfully requests that the Complaint be dismissed with prejudice, and Defendant be awarded her reasonable attorneys' fees and costs pursuant to Virginia Code § 8.01-223.2, and otherwise.

April 13, 2021

Respectfully submitted,



Elaine Charlson Bredehoft (VSB No. 23766)
Adam S. Nadelhaft (VSB No. 91717)
Clarissa K. Pintado (VSB No. 86882)
David E. Murphy (VSB No. 90938)
Charlson Bredehoft Cohen & Brown, P.C.
11260 Roger Bacon Drive, Suite 201
Reston, Virginia 20190
Telephone: (703) 318-6800
ebredehoft@cbcblaw.com
anadelhaft@cbcblaw.com
cpintado@cbcblaw.com
dmurphy@cbcblaw.com

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
brottenborn@woodsrogers.com
jtreece@woodsrogers.com

Counsel to Defendant Amber Laura Heard

CERTIFICATE OF SERVICE

I certify that on this 13th day of April, 2021, a copy of the foregoing was served by email, as agreed upon by counsel and Court Order, upon:

Benjamin G. Chew, Esq.
Andrew C. Crawford, Esq.
BROWN RUDNICK LLP
601 Thirteenth Street, N.W.
Washington, D.C. 20005
Telephone: (202) 536-1700
Facsimile: (202) 536-1701
bchew@brownrudnick.com
acrawford@brownrudnick.com

Camille M. Vasquez, Esq.
BROWN RUDNICK LLP
2211 Michelson Drive
Irvine, CA 92612
Telephone: (949) 752-7100
Facsimile: (949) 252-1514
cvasquez@brownrudnick.com

Counsel for Plaintiff John C. Depp, II



Elaine Charlson Bredehoft (VSB No. 23766)

Claim No QB-2018-006323
 IN THE HIGH COURT OF JUSTICE
 QUEEN'S BENCH DIVISION
 MEDIA AND COMMUNICATIONS LIST
 Royal Courts of Justice,
 Strand,
 London, WC2A 2LL
 Tuesday, 28th July, 2020
 Before:
 MR. JUSTICE NICOL

BETWEEN:

JOHN CHRISTOPHER DEPP II
 Claimant

-and-

(1) NEWS GROUP NEWSPAPERS LIMITED
 (2) DAN WOOTTON
 Defendants

(Transcript of the Stenograph Notes of
 Marten Walsh Cherer Limited, 2nd Floor, Quality House,
 6-9 Quality Court, Chancery Lane, London, WC2A 1HP.
 Telephone No: 020 7067 2900. Fax No: 020 7831 6864.
 Email: info@martenwalshcherer.com. www.martenwalshcherer.com)

MR. DAVID SHERBORNE, MS. ELEANOR LAWS QC and MS. KATE WILSON
 (instructed by Schillings) appeared for the Claimant.

MS. SASHA WASS QC, MR. ADAM WOLANSKI QC and MS. CLARA HAMER
 (instructed by Simons Muirhead & Burton) appeared for
 the Defendants.

PROCEEDINGS
 (DAY 16)
 (TRANSCRIPT PREPARED WITHOUT ACCESS TO COURT BUNDLES)

1 CLOSING - SHERBORNE
 2 your Lordship will understand.
 3 There is a series of annexes. The first annex is, as we
 4 say, the defendants' case not put to the claimant.
 5 Your Lordship will recall that I foreshadowed this at one
 6 point earlier in the trial. Then you will find an annex B,
 7 what we call the evolution of incident 2, the so-called
 8 painting incident, which we say changed radically on a number
 9 of occasions during the course of the evidence. As I say,
 10 that is something which I may draw your Lordship's attention
 11 to in due course.
 12 Then there is an annex relating to the Australian
 13 criminal proceedings and what Ms. Heard has said about them,
 14 and I hope that is helpful. Again, I may briefly touch on
 15 this, but that is a more detailed note for your Lordship to
 16 consider. The next annex is a summary of the eye witness
 17 evidence for the period between 21st and 27th May. It
 18 includes, as your Lordship will see, not just the claimant's
 19 witnesses, but also the defendants' witnesses and those from
 20 whom we have not heard.
 21 Then there is the next annex, which is the issue of
 22 Ms. Heard attending the courthouse on 27th May, which we say
 23 was an obvious publicity stunt, and I will touch on that.
 24 Your Lordship will then find two further annexes, first of
 25 all, what we describe as Ms. Heard shifting the blame. There

1 CLOSING - SHERBORNE
 2 MR. JUSTICE NICOL: Yes, Mr. Sherborne.
 3 MR. SHERBORNE: My Lord, before I begin, I do not know whether
 4 your Lordship has received a bundle from us, a hard copy
 5 bundle?
 6 MR. JUSTICE NICOL: Yes.
 7 MR. SHERBORNE: You have. Can I explain to you what it is?
 8 MR. JUSTICE NICOL: Yes.
 9 MR. SHERBORNE: Ms. Wass has asked me and we will provide the
 10 defendants with a copy. As I understand it, we are providing
 11 them very, very shortly with a soft copy. Unfortunately, the
 12 photocopying department at my instructing solicitors is not
 13 working at the moment, and we are having difficulty, but we
 14 have provided in soft copy form. I hope that means that
 15 Ms. Wass and her team can follow, although, to be fair -- and
 16 I will take you through this bundle if I may in a moment -- I
 17 am not going to place much reliance on it at this stage.
 18 Rather like the defendants' bundle, it is intended as
 19 something to assist your Lordship in the task you face of
 20 considering the evidence.
 21 Just to very briefly take you through it, your Lordship
 22 should see, at the front, our closing skeleton. There is a
 23 confidential annex, just so that your Lordship and everyone
 24 else is aware. It is a very short annex, but it is important
 25 that it is recognised that it is confidential, for reasons

1 CLOSING - SHERBORNE
 2 are a number of incidents where Ms. Heard, in order to meet
 3 the evidence which she was faced with, decided that she would
 4 blame others, and in particular Mr. Depp. Finally, there is a
 5 selection of extracts.
 6 MR. JUSTICE NICOL: Annex X.
 7 MR. SHERBORNE: Annex X, a convenient letter, your Lordship may
 8 feel, which deals with the evidence incident by incident. So
 9 in addition, after I have finished my closing speech, tomorrow
 10 at some point, I will provide your Lordship with a copy of it,
 11 together with the bundle references, which I hope means I can
 12 take this relatively quickly, and I hope that is helpful as
 13 well. For now, your Lordship can put this file away.
 14 MR. JUSTICE NICOL: A couple of authorities have also appeared.
 15 MR. SHERBORNE: That is right. They support the points we have
 16 put in our closing skeleton. I think they are
 17 self-explanatory, if your Lordship works through the skeleton
 18 we have provided.
 19 MR. JUSTICE NICOL: Shall I add those just --
 20 MR. SHERBORNE: The convenient place for them, I am sure, is
 21 behind the closing skeleton. They are referred to, as
 22 your Lordship will see. For now, as I say, your Lordship can
 23 put that file away and I will begin.
 24 MR. JUSTICE NICOL: Yes.
 25 MR. SHERBORNE: Having sat and listened to almost three weeks of

[Page 2501]

1 CLOSING - SHERBORNE
 2 presented.
 3 The first issue which your Lordship will need to decide,
 4 and one we say will not take you much time to do so, is the
 5 meaning of the article. The claimant's meaning is that
 6 Mr. Depp was guilty on overwhelming evidence of serious
 7 domestic violence —
 8 MR. JUSTICE NICOL: Let me just look at the pleadings.
 9 MR. SHERBORNE: Your Lordship will find them in file 1, tab 13.
 10 Does your Lordship have tab 13?
 11 MR. JUSTICE NICOL: I do.
 12 MR. SHERBORNE: If you turn to internal page — perhaps it is
 13 easier if I tell your Lordship.
 14 MR. JUSTICE NICOL: Paragraph 10.
 15 MR. SHERBORNE: Paragraph 10. Just to make good what I said to
 16 your Lordship moments ago, there it says that "the claimant
 17 was guilty on overwhelming evidence of serious domestic
 18 violence against his then wife", and then these important
 19 words, "causing significant injury and leading to her fearing
 20 for her life, for which the claimant was constrained to pay no
 21 less than £5 million to compensate her, and which resulted in
 22 him being subjected to a continuing court restraining order,
 23 and for that reason he is not fit to work in the film
 24 industry."
 25 Just to make good what I said to your Lordship before

[Page 2502]

1 CLOSING - SHERBORNE
 2 about allegations which required some evidence to meet them,
 3 your Lordship will find them if you turn over the page to
 4 page 10. You will find a series of allegations relating to
 5 the way in which, as I say, the article was not properly
 6 researched and was presented in a wholly one-sided manner.
 7 There is no evidence at all from the defendants' journalists
 8 to meet that.
 9 As if that is not enough, your Lordship will see, and
 10 I ask you to read, paragraph 13.5 of the Particulars dealing
 11 with Ms. Kendall and the way in which she was misquoted
 12 because I will have things to say about that in due course.
 13 For the moment, that is the meaning which we ask your Lordship
 14 to find.
 15 Mr. Depp, as we say, was tried, convicted, and
 16 sentenced. That is what the article suggests. So the short
 17 answer is that we are all here because the newspaper, and
 18 Mr. Wootton, chose to publish this extremely serious
 19 allegation, an allegation which Mr. Depp says, and has always
 20 said, is completely untrue. Not only that, they have
 21 persisted in saying that it is true, and I will have more to
 22 say about that in due course. That is why Mr. Depp is
 23 bringing this claim for libel, subjecting himself to this
 24 painful public process, because he knows it is untrue, as do
 25 all the people from various walks of his life — friends, some

[Page 2503]

1 CLOSING - SHERBORNE
 2 of them, some nothing to do with him — who have come along to
 3 give their evidence and themselves be accused of lying for
 4 Mr. Depp. It was in one sweep by Ms. Wass, as she gave
 5 yesterday in her closing submissions, regardless of the fact
 6 that a number of them do not even work for Mr. Depp or do not
 7 have to rely on him for their livelihood, as they made plain
 8 in their evidence.
 9 Yes, we say, why else would Mr. Depp, this very private
 10 man as he explained, expose all the most intimate details of
 11 his personal life, even the very little privacy that he has
 12 managed to maintain despite his successful career as an actor?
 13 The point will not be lost on your Lordship any more than it
 14 is lost on those outside of this courtroom.
 15 ~~As for the defendants, they could have just ignored~~
 16 ~~Ms. Heard's claims, but they chose not to. They could have~~
 17 ~~just reported them alongside Mr. Depp's position, but they~~
 18 ~~deliberately decided not to do so. They chose instead, as I~~
 19 ~~say, to convict Mr. Depp and that is what they seek to do in~~
 20 ~~this court, to prove that this reputation-destroying~~
 21 ~~career-ending allegation is true. That is what your Lordship~~
 22 ~~is concerned about, true or not.~~
 23 So, as I say, that is the short answer as to why we are
 24 here, but there is also a longer answer, and it goes back
 25 beyond the article being published in 2018. It goes to May

[Page 2504]

1 CLOSING - SHERBORNE
 2 27th, 2016, to a scene we have watched on the screen before
 3 you, to Ms. Heard outside a courtroom in Los Angeles,
 4 surrounded by paparazzi photographers and the media, and
 5 sporting rather visible bruises. That is when her story
 6 started, as far-fetched as we say it has proved to be, when
 7 she first decided to tell the world that Mr. Depp was a
 8 wife-beater. It is hard to think of a more public way to do
 9 this, however much she protested to the contrary. She has set
 10 herself up ever since as an advocate of the #MeToo movement,
 11 and in the process, we say, she has picked up her theme and
 12 run with it. New allegations of domestic violence have
 13 tumbled out over the years, new twists to those allegations
 14 and even more in the last few days before trial and in this
 15 courtroom as she gave her evidence, particularly in
 16 re-examination. It is hard to keep up with them. Even the
 17 defendants have not pursued many of the most recent ones,
 18 quite what your Lordship is meant to do about that I cannot
 19 say. You can imagine though how Mr. Depp feels about it,
 20 given that some of them were not even put to him.
 21 So, the longer answer as to why we are here is because
 22 Ms. Heard has chosen to tell the whole world about her
 23 allegations of domestic violence. This is nothing to do with
 24 Mr. Depp's supposed PR machine or his supposed influence in
 25 Hollywood. This is because Ms. Heard has wanted to tell her

VIRGINIA:

IN THE CIRCUIT COURT OF FAIRFAX COUNTY

John C. Depp, II,)	
)	
Plaintiff,)	
)	Civil Action No.: CL-2019-0002911
v.)	
)	
Amber Laura Heard,)	
)	
Defendant.)	
)	

PLAINTIFF JOHN C. DEPP, II'S MEMORANDUM IN SUPPORT OF MOTION TO
COMPEL DEFENDANT AMBER LAURA HEARD'S FURTHER RESPONSES
WITHOUT OBJECTIONS AND PRODUCTION OF DOCUMENTS IN RESPONSE TO
FOURTH REQUESTS FOR PRODUCTION

Benjamin G. Chew (VSB #29113)
BROWN RUDNICK LLP
601 Thirteenth Street NW, Suite 600
Washington, DC 20005
Phone: (202) 536-1785
Fax: (617) 289-0717
bchew@brownrudnick.com
acrawford@brownrudnick.com

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

Counsel for Plaintiff John C. Depp, II

In short, Ms. Heard is attempting to withhold highly relevant documents. For instance, a hypothetical document discussing the truth or falsity of an earlier statement by Mr. Waldman about Ms. Heard, or its effect on Ms. Heard's reputation, might be withheld on the specious grounds that it does not specifically relate to one of the three specific statements that survived Mr. Depp's Plea in Bar. But such a document could nonetheless be highly relevant to issues such as the truth or falsity of Mr. Waldman's later statements. ~~Similarly, such a document could be critically relevant to a damages analysis, to show that any alleged damages to Ms. Heard's reputation were actually attributable to earlier statements that are now time-barred. The scope of discovery in Virginia is broad, and Ms. Heard may not withhold documents relevant to the subject of this action, based on her unilateral determination that they do not specifically relate to one of the three surviving statements in her Counterclaim.~~ Va. R. Sup. Ct. 4:1(a).

II. Improper Limiting Language In Response To RFP Nos. 2, 18, and 19

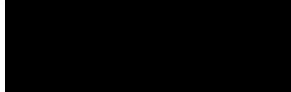
RFP No. 2 seeks documents reflecting acting projects for which Ms. Heard was rejected, from 2010 to present. This is essential to analyzing Ms. Heard's \$100 million Counterclaim, which is based on Ms. Heard's contention that a handful of tweets by Adam Waldman caused \$100 million in damages to her career. Ms. Heard only agreed to produce documents dated *after April 8, 2020*, apparently based on the date of Mr. Waldman's alleged statements. That is not a reasonable position. To assess Ms. Heard's claimed \$100 million in damages, Mr. Depp must assess Ms. Heard's plausible income and career trajectory over a period of time. The state of Ms. Heard's career prior to April 8, 2020 is relevant to evaluating the impact, if any, of any tweets by Mr. Waldman. If Ms. Heard was frequently rejected for acting jobs prior to April 8, 2020, that would undermine any claim that subsequent rejections are attributable to Mr. Waldman's tweets. Indeed, no damages analysis can be conducted without such information.

allegations against Mr. Depp on Ms. Heard's reputation and career. By asserting a \$100 million Counterclaim for defamation, Ms. Heard put her reputation directly at issue. Mr. Depp is entitled to explore the relative impact of each of these events on Ms. Heard's career and reputation. For instance, if documents suggest that Ms. Heard's career was damaged more by the parties' widely publicized litigation than by a few tweets from Mr. Waldman, that fact would be relevant to challenge her claimed damages. Mr. Depp also contends that Ms. Heard manipulated the public and the press to falsely portray herself as a heroic survivor of abuse, in part to burnish her reputation and raise her profile, and is entitled to seek discovery to support that contention.

RFP No. 15 seeks documents related to the domestic violence restraining order sought by Ms. Heard when the parties divorced, *in which Ms. Heard publicly alleged in court filings that she had been abused by Mr. Depp*. While a subset of responsive documents might be privileged, any non-privileged documents that pertain to the restraining order or its contents are directly relevant. To state the obvious, *the truth or falsity of Ms. Heard's abuse allegations are at the heart of this case*. Documents and communications regarding the restraining order are reasonably calculated to lead to admissible evidence on that issue, and cannot be withheld.

RFP No. 17, 21, 23, 25, and 27 seek documents related to any contention that Ms. Heard suffered damages as a result of statements by Mr. Depp and Mr. Waldman that have now been eliminated as part of Ms. Heard's Counterclaim by Mr. Depp's Plea in Bar. **However, the information sought by these RFPs remains relevant to a damages analysis. Mr. Depp is entitled to explore how much of Ms. Heard's \$100 million in alleged damages was claimed to be attributable to the five statements that are no longer part of Ms. Heard's Counterclaim. In other words, Mr. Depp is entitled to explore issues such as whether Ms. Heard's claimed damages are attributable, in whole or in part, to earlier statements as to which any claim is time-barred.**

Respectfully submitted,



Benjamin G. Chew (VSB #29113)
BROWN RUDNICK LLP
601 Thirteenth Street NW, Suite 600
Washington, DC 20005
Phone: (202) 536-1785
Fax: (617) 289-0717
bchew@brownrudnick.com
acrawford@brownrudnick.com

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

Counsel for Plaintiff John C. Depp, II

Dated: February 12, 2021

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this 8th day of April 2021, I caused copies of the foregoing to be served via email (per written agreement between the Parties) on the following:

Elaine Charlson Bredehoft (VSB No. 23766)
Carla D. Brown (VSB No. 44803)
Adam S. Nadelhaft (VSB No. 91717)
David E. Murphy (VSB No. 90938)
CHARLSON BREDEHOFT COHEN & BROWN,
P.C.
11260 Roger Bacon Dr., Suite 201
Reston, VA 20190
Phone: 703-318-6800
Fax: 703-318-6808
ebredehoft@cbcblaw.com
cbrown@cbcblaw.com
anadelhaft@cbcblaw.com
dmurphy@cbcblaw.com

A. 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
brottenborn@woodsrogers.com
jtreece@woodsrogers.com

Counsel for Defendant Amber Laura Heard


Benjamin G. Chew

SUPERIOR COURT OF THE STATE OF CALIFORNIA
COUNTY OF LOS ANGELES, CENTRAL DISTRICT

JOHN C. DEPP, II; and EDWARD
L. WHITE, as trustees of the
Sweetzer Trust, and as
trustee of the Mooh
Investment Trust,

Plaintiffs,

vs.

THE MANDEL COMPANY, INC.,
d/b/a THE MANAGEMENT GROUP,
a California corporation;
JOEL L. MANDEL, individually
and as former trustee of the
Sweetzer Trust; ROBERT
MANDEL; FIRST AMERICAN TITLE
INSURANCE COMPANY, a
California corporation; and
DOES 1 through 15,
inclusive,

Defendants.

THE MANDEL COMPANY, INC.
(dba THE MANAGEMENT GROUP);
JOEL L. MANDEL and ROBERT
MANDEL,

Cross-Complainants,

vs.

JOHN C. DEPP, II, an
individual; SCARAMANGA
BROS., INC., a California
corporation; L.R.D.
PRODUCTIONS, INC.; a
California corporation;
EDWARD WHITE, an individual;
EDWARD WHITE & CO., LLP, a
California limited liability
partnership; ELISA CHRISTI
DEMBROWSKI, an individual;

Case No. BC 646882

1 WILLIAM RASSEL, an)
 2 individual; NATHAN HOLMES,)
 3 an individual; JAMES RUSSO,)
 4 an individual; JONATHAN)
 5 SHAW, an individual; SAL)
 6 JENCO, an individual; BRUCE)
 7 WITKIN, an individual;)
 8 UNISON MUSIC, LLC, a)
 9 California limited liability)
 10 company; and ROES 1)
 11 through 20, inclusive,)
 12)
 13)
 14)
 15)
 16)
 17)
 18)
 19)
 20)
 21)
 22)
 23)
 24)
 25)

Cross-Defendants.

DEPOSITION OF TRACEY JACOBS

Los Angeles, California

Wednesday, May 30, 2018

Job: 27947

1 Johnny and from Christi; correct?

2 A. Yes.

3 Q. Did it become harder for you to find good paying
4 jobs for him at some point in time while you were still
5 his talent agent?

6 A. Yes.

7 Q. And when did that start?

8 A. That started -- I would say, approximately,
9 2010, '11.

10 Q. Okay. And give me an example of how you
11 experienced that.

12 A. When I'd call to talk to a studio head, or a
13 director, or a producer, I was questioned about certain
14 things.

15 Q. And what were those things that you were
16 questioned about?

17 A. Lateness, complicated, unavailable. And it
18 seemed that there was a reputation that he had.

19 Q. And you had to directly deal with that, correct?

20 A. Yes.

21 Q. Did you talk to Johnny about that?

22 A. Many times.

23 Q. And what did you -- in substance, what did you
24 say to him about this issue?

25 A. You're late, people have a hard time with that,

1 A. I don't know.

2 Q. Okay. You weren't involved in efforts to get
3 him into a detox program --

4 A. I tried to get him into rehab. I don't know if
5 he ever went into detox.

6 Q. Okay. Did his -- from your perspective, in your
7 experience with him, did the drug use affect his moods
8 and his personality?

9 MR. CHEW: Objection to the form of the
10 question; calls for speculation.

11 MR. FREEDMAN: You can answer.

12 THE WITNESS: Yes.

13 BY MR. KUMP:

14 Q. Okay. In a negative way?

15 A. Yes.

16 Q. How so?

17 A. Anger, hostility, unwillingness to communicate.

18 Q. **Did it affect -- did his drug use affect his**
19 **professional career, in terms of his performance, such**
20 **as his reliability, his showing up on time, things of**
21 **that nature?**

22 MR. CHEW: Objection to the form of the
23 question; calls for speculation.

24 MR. FREEDMAN: You can answer.

25 **THE WITNESS: Yes.**

1 BY MR. KUMP:

2 Q. Okay. And do you know that from talking to
3 people who were directly involved with trying to get him
4 to perform, and otherwise appear on time?

5 A. Yes.

6 Q. And I think you testified previously that
7 starting in or around 2010, you had more and more
8 difficulty getting jobs for him, or, you know, movies
9 for him, because word was out that he was difficult,
10 things of that nature. Did the drug use figure into
11 those concerns, as well?

12 MR. CHEW: Objection to the form of the
13 question.

14 MR. FREEDMAN: You can answer.

15 THE WITNESS: Yes.

16 BY MR. KUMP:

17 Q. And are these issues -- the drug use, the
18 inability to show up on time, all of those problems also
19 things that you discussed with Christi during that
20 period of time?

21 A. Yes, but I also discussed it with Johnny
22 directly.

23 Q. Okay. And did you -- did you ever feel like you
24 broke through in talking to him, where he really got
25 what you were trying to tell him?

1 A. No.

2 Q. And that's true during this entire period of
3 time?

4 A. On and off. I can't say it was true
5 consistently. More on than off.

6 Q. More often than not?

7 A. Yes.

8 Q. **Okay. How about alcohol abuse, was that also**
9 **part of the problem?**

10 A. **Yes.**

11 Q. Could you tell from your own experience where,
12 when the issue was alcohol abuse versus drug abuse, or
13 did they kind of run together?

14 A. They --

15 MR. FREEDMAN: Objection to the form of the
16 question. You can answer.

17 THE WITNESS: I couldn't tell.

18 BY MR. KUMP:

19 Q. You just knew that there was obviously a problem
20 because he was abusing substances?

21 A. I think it was both.

22 Q. Okay. Did you believe him when he told you that
23 he hadn't hit Amber?

24 MR. CHEW: Objection to the form of the
25 question.

1 MR. CHEW: Objection to the form of the
2 question; calls for speculation.

3 THE WITNESS: I'm not sure.

4 BY MR. KUMP:

5 Q. In the period of 2013/'14, '15 -- well,
6 2013/'14, '15, and '16, did you think that there was
7 still -- that Mr. Depp was still having problems with
8 substance abuse?

9 A. Yes.

10 Q. Okay.

11 (Exhibit 70 marked.)

12 BY MR. KUMP:

13 Q. Exhibit 70 appears to be something that was
14 e-mailed to you by The Wrap, which is an online
15 periodical. It says, "Watch Johnny Depp's Bizarre
16 Hollywood Film Awards Speech That Set Social Media
17 Abuzz." And then you forwarded this on to Christi;
18 correct?

19 A. Yes.

20 Q. And what was it that this was depicting?

21 A. He was giving an award to -- oh, my God, I can't
22 remember. He was giving an award to -- literally to
23 someone at this moment that I can't recall. And he
24 walked on the stage -- and it was televised for the
25 first time, and every studio head in town and a lot of

1 other actors were there.) And he was wavering and
2 swaying from side to side, and looked completely out of
3 it.)

4 Q. Do you think that most people who looked at it
5 would conclude that he was under the influence of
6 something?

7 MR. CHEW: Objection to the form of the
8 question. It clearly calls for speculation.

9 MR. FREEDMAN: If you know.

10 THE WITNESS: Yes.)

11 MR. KUMP: Okay.

12 BY MR. KUMP:

13 Q. And why did you send it to Christi?

14 A. It's her brother. I wanted her to see what
15 people were talking about. Everybody in town was
16 talking about it. I got a lot of calls. I was sitting
17 with another actor of ours who couldn't believe what he
18 was watching, and it was sad.

19 Q. Other people commented on this to you?

20 A. Yes.)

21 Q. And in your experience as a talent agent of many
22 years, is this type of publicity good for one's career?

23 A. No.)

24 Q. Why is that?

25 A. I think the answer is somewhat obvious.)

1 Q. Yes, okay.

2 A. It's not good to see someone high that you're
3 paying millions of dollars to that's being televised on
4 national TV, and everyone is talking about it.

5 Q. Did you ever talk to Johnny about this event
6 after it happened?

7 A. Yes.

8 Q. And what did he say?

9 A. I don't recall exactly, but I spoke to his
10 publicist as well, and she said that he had smoked some
11 pot and taken a Xanax before he walked on the stage.

12 (Exhibit 71 marked.)

13 BY MR. KUMP:

14 Q. These are a series of e-mails from February of
15 2015 -- late February. On the second page, Ms. Jacobs,
16 is the first e-mail, which is an e-mail from you on
17 February 26th. It says, "Sean Bailey did call me."

18 And who is Sean Bailey?

19 A. The president of Disney.

20 Q. Okay. He said, "There were 300 extras
21 yesterday. Disney is going to give him two days-ish to
22 correct the lateness, and then there will be problems.
23 Was he with the Foo Fighters last night?"

24 And is this referring to Mr. Depp on the set of
25 the Pirates five filming?

1 A. Yes.

2 Q. And what -- what did -- I mean, I can tell from

3 this, but Mr. Bailey was upset, I take it?

4 A. Yes.

5 Q. Concerned?

6 A. Yes.

7 Q. I guess, presumably, 300 extras sat around

8 waiting for Jonny to show up?

9 MR. CHEW: Objection to the form of the
10 question.

11 BY MR. KUMP:

12 Q. Again, the question is, what did Mr. Bailey tell

13 you?

14 A. That he was four to six hours late, that the
15 crew and 300 extras sat for hours waiting for him, and
16 he finally showed up. But this was not the first time,
17 and it wasn't going to be tolerated.

18 Q. And in a later e-mail on the first page, you

19 say, "Sam Dickerman also just called me."

20 And who is Sam Dickerman?

21 A. He's the vice president of Disney. His -- he
22 was overseeing the movie, below Sean.

23 Q. Okay. So Sean would have been his boss?

24 A. Yes.

25 Q. Okay. And Sean -- they were filming in

1 Australia at that time; is that correct?

2 A. Yes.

3 Q. **And Sean made it clear that he was not going to**
4 **out up with this?**

5 A. **Yes, but they couldn't fire him.**

6 Q. **Right, right. What could they do?**

7 A. **Well, they could have imposed financial**
8 **penalties, but they didn't.**

9 Q. And did you ever -- did you try to get ahold of
10 Johnny to talk to him about this?

11 A. Yes.

12 Q. And were you able to?

13 A. No.

14 Q. Did you talk to Christi about it?

15 A. Yes.

16 Q. And what did you tell her?

17 A. Exactly what the e-mail said, which is exactly
18 the circumstances. I didn't mince words.

19 Q. And what did she say? Did she understand the
20 seriousness of it?

21 A. I don't know.

22 Q. Okay. Do you recall what she said in response
23 to you?

24 A. No. I'm sure it was a defense.

25 (Exhibit 72 marked.)

1 BY MR. KUMP:

2 Q. So this is -- you can see, there's an e-mail at
3 the very bottom, the next day, February 27th, to you
4 from John Bailey, and said, "Eight hours late yesterday.
5 We're a day behind on our schedule. I've lit" -- left
6 word -- "for Christi."

7 Do you see that?

8 A. Yes.

9 Q. And then you wrote -- Christi says, "Yeah, I
10 will call him."

11 You say, "Bruckheimer just called me and said if
12 he's not on time Monday, we have a real problem. I
13 don't know what to do. Jerry isn't there" -- "isn't
14 there on location, so I don't know who will be speaking
15 to him."

16 Do you see that?

17 A. Yes.

18 Q. Okay. And, again, this is just more of the
19 same? I mean, more -- this studio is upset, he's being
20 late, he's not showing up, and they're trying to put
21 pressure on you to get this corrected, I take it?

22 MR. CHEW: Objection to the form of the
23 question.

24 THE WITNESS: What's the question?

25 ///

1 BY MR. KUMP:

2 Q. (The question was -- well, again, just looking,
3 Christi writes, "I will see what we can do to make sure
4 he knows and understands. I know he felt bad about the
5 other day, so he was mindful of needing to turn" -- "to
6 get turned around.")

7 (And then you wrote, "Jerry has said he's been
8 late every day at least two hours. He also referenced
9 his lateness on Alice 2 and Mortdecai, which clearly is
10 out there. Is there anything I can do?")

11 (Does this go back to the point you made earlier,
12 which was that there were -- that there was word among
13 the people in the entertainment industry that he was
14 becoming increasingly unreliable?)

15 MR. CHEW: Objection to the form of the
16 question.

17 MR. FREEDMAN: You can answer.

18 (THE WITNESS: Yes.)

19 BY MR. KUMP:

20 Q. (Okay. And that there had been issues regarding
21 his -- as you said, his lateness?)

22 A. (Yes.)

23 Q. (And now this was P3 -- P5, Pirates five?)

24 A. (P5.)

25 Q. Christi, in response to you, she said, "The

1 everyday time frame seems to grow. He told me one to
2 one and a half, but not two hours. Yes, he was two and
3 a half hours late one day, and seven hours recently."
4 She goes, "I know all of it, and what he needs to do. I
5 think he knows, also. Working on how to get him there,
6 but I don't know what to tell you to do to help. I know
7 you could call or e-mail, or go through the guys, but
8 not sure how that would go over if it's just telling him
9 what he needs to do to be better. That's not always
10 helpful with all people, to be honest."

11 Do you see that? Is that consistent with the
12 types of conversations --

13 A. Yes, it's consistent to the point that I made
14 earlier that she would always defend him, and never say,
15 you're right, we've gotta deal with this, and she was no
16 help whatsoever, because she'd be too busy defending his
17 behavior.

18 Q. **And what eventually happened on the filming of**
19 **P5? It obviously got done.**

20 A. **Well, they shut it down for over a week because**
21 **he cut his finger off.**

22 Q. And that shut down the whole production?

23 A. Yes.

24 Q. **And do you have any idea what that would cost**
25 **the studio, to shut a production of that size down for a**

1 week?

2 A. Millions and millions of dollars.

3 Q. Okay. And at the end -- and, again, did the
4 studio voice its frustrations with you about that event?

5 A. Yes.

6 Q. And what was your response?

7 A. I'm sorry. I flew to Australia twice within
8 three weeks to see him. The first time I got there, he
9 had left on his way back for Los Angeles to get his
10 finger fixed. So I had just arrived, and he was gone,
11 so he came three weeks later to address the issue in
12 person.

13 Q. And what did he say?

14 A. He was sweet, he laughed, Amber was on the set,
15 and everything was hunky-dory and fine.

16 Q. And then did the movie go on from there and get
17 made?

18 A. Yes.

19 Q. Okay. Without -- were there further incidents
20 at that point?

21 A. Yes.

22 Q. Okay. More -- more lateness and tardiness?

23 A. Yes.

24 Q. But eventually, it got done?

25 A. Yes.

1 Q. Did you continue to have conversations with him
2 as the studio would bring these problems to your
3 attention?

4 A. Yes.

5 Q. Were you able to get ahold of him?

6 A. Occasionally.

7 Q. Okay. And what would he say?

8 A. Not much.

9 Q. **In your experience -- again, for as many years**
10 **as you've been a talent agent, when you have this kind**
11 **of conduct and repeated behavior, over and over, over a**
12 **period of years, what does that do to one's career?**

13 MR. CHEW: Objection, form of the question.

14 MR. FREEDMAN: You can answer.

15 **THE WITNESS: It certainly doesn't help one's**
16 **career progress in the right direction. It makes it**
17 **more and more difficult to procure employment, to keep**
18 **his price rate up, and to give him the opportunities**
19 **that I wanted him to have.**

20 BY MR. KUMP:

21 Q. **And is that what you saw increasingly over the**
22 **years?**

23 A. **Yes.**

24 Q. Okay. And by the time that you -- by the time
25 that he terminated you, was it at a crisis point, in

1 or something -- whatever. You write back and said,
2 "Thanks. I got a call from Disney last week saying he
3 showed up five hours late for ADR work in London for
4 Pirates five. I really need to speak to him before he
5 starts work on this next project in Los Angeles, in LA."

6 And ADR work is what?

7 A. Looping -- I forget what it stands for, but it's
8 where you go in and record your lines for picture.

9 Q. Okay. But it's something that would need to
10 take place before the film could be released?

11 A. Of course, yes.

12 Q. And Ed White wrote back and said, "All you can
13 do is continue to reach out in a thoughtful and
14 professional manner. When feasible, I will attempt to
15 assist you."

16 What was your response -- what was your reaction
17 to that response?

18 A. I thought it was bullshit.

19 Q. Yeah. And then you wrote back and said, "I'm
20 always thoughtful and professional. You're the only one
21 I get information from. There are three international
22 commercial campaigns we have real potential for on
23 Johnny."

24 Again, you got no response; correct?

25 A. Correct.

1 Christi, at his company. And we went to see Alan Horn,
2 whose the chairman of Disney, and Sean Bailey, the
3 president, and essentially groveled for an additional
4 year. **There was no love between Johnny and Disney,**
5 **given the Pirates five situation.** But, for us, they
6 agreed to extend it, so he wouldn't have no deal, and no
7 way to pay his people.

8 Q. So you got an additional six months --

9 A. An additional million dollars for him to
10 continue paying his staff.

11 Q. To keep the production company alive?

12 A. Yes.

13 Q. Okay. All right. If you go to Page 187 --

14 A. Can I take a break?

15 Q. Yeah.

16 A. Sorry.

17 Q. Yes. No, no, that's fine.

18 THE VIDEOGRAPHER: The time on the monitor is
19 3:16 p.m. We are going off the record. This is the end
20 of media two in the deposition of Tracey Jacobs.

21 (Off the record.)

22 THE VIDEOGRAPHER: Good afternoon. We are back
23 on the record. The time on the video monitor is 3:31
24 p.m. This is the beginning of media three in the
25 deposition of Tracey Jacobs. Please continue.

1 State of California)
2 County of LOS ANGELES)
3

4 I, Kathy Mannlein, Certified Shorthand Reporter,
5 do hereby certify:

6 That prior to being examined, the witness in the
7 foregoing proceeding was by me duly sworn to testify to
8 the truth, the whole truth, and nothing but the truth;

9 That said proceedings were taken before me at the
10 time and place therein set forth and were taken down by
11 me in shorthand and thereafter transcribed into
12 typewriting under my direction and supervision;

13 I further certify that I am neither counsel for,
14 nor related to, any parties to said proceedings, nor in
15 anywise interested in the outcome thereof.

16 In witness whereof, I have hereunto subscribed my
17 name.

18
19 Dated: June [REDACTED]
20
21

22 Kathy Mannlein
23 CSR No. 13153
24
25

From: Tracey Jacobs [/O=UTAORG/OU=UTABH/CN=RECIPIENTS/CN=JACOBS]
Sent: Saturday, November 15, 2014 12:20:08 PM
To: 'cd@infinitem-nihil.com'
Subject: Fw: Watch Johnny Depp's Bizarre Hollywood Film Awards Speech That Set Social Media Abuzz (Video)

From: TheWrap [mailto:no-reply@thewrap.com]
Sent: Saturday, November 15, 2014 12:17 PM
To: Tracey Jacobs
Subject: Watch Johnny Depp's Bizarre Hollywood Film Awards Speech That Set Social Media Abuzz (Video)



November 15,
2014 | 12:16 PM

Fans wonder if "Pirates of the Caribbean" actor had tapped into Captain Jack's rum stash before taking the stage at CBS-televised event

Full story at **TheWrap**



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888 7th Ave 9th Floor New York, NY 10102 (DCA-2011819)

EXHIBIT 70
WITNESS Tracey Jacobs
DATE 5/3/18
KATHY MANNLEIN CSR

CONFIDENTIAL

UTA 017041

DEPP00019233 70

From: Tracey Jacobs [/O=UTAORG/OU=UTABH/CN=RECIPIENTS/CN=JACOBST]
Sent: Thursday, February 26, 2015 4:21:04 PM
To: 'cd@infinitum-nihil.com'
Subject: Re: P 5

He just called me from australia. He's on set. Sean called me from la. X

----- Original Message -----

From: cd@infinitum-nihil.com [mailto:cd@infinitum-nihil.com]
Sent: Thursday, February 26, 2015 04:18 PM
To: Tracey Jacobs
Subject: Re: P 5

Sam was just in LA

Typos could be me but blaming my phone...sorry!

> On Feb 26, 2015, at 4:08 PM, Tracey Jacobs <JacobsT@unitedtalent.com> wrote:

> Sam is in australia and reporting all this.

> ----- Original Message -----

> **From:** Tracey Jacobs
> **Sent:** Thursday, February 26, 2015 04:07 PM
> **To:** 'cd@infinitum-nihil.com' <cd@infinitum-nihil.com>
> **Subject:** Re: P 5

> Stephen or nathan or you? **Sam dickerman also just called me. He said he hoped this was a wake-up call.** They say he's great but you know the problem. Xxx

> ----- Original Message -----

> **From:** cd@infinitum-nihil.com [mailto:cd@infinitum-nihil.com]
> **Sent:** Thursday, February 26, 2015 04:03 PM
> **To:** Tracey Jacobs
> **Subject:** Re: P 5

> Anyone as in who? Jerry did last week when he was super late.
> He himself said he needs to get turned around.

> Typos could be me but blaming my phone...sorry!

>> On Feb 26, 2015, at 4:01 PM, Tracey Jacobs <JacobsT@unitedtalent.com> wrote:

>> **He will get away if the lateness doesn't change.** Has anyone spoken to him? Xxx

>> ----- Original Message -----

>> **From:** cd@infinitum-nihil.com [mailto:cd@infinitum-nihil.com]
>> **Sent:** Thursday, February 26, 2015 04:00 PM
>> **To:** Tracey Jacobs
>> **Subject:** Re: P 5

>> Not that I know of.

>> Typos could be me but blaming my phone...sorry!

EXHIBIT 71
WITNESS Tracy Jacobs
DATE 5/20/19
KATHY MANNLEIN CSR

CONFIDENTIAL

UTA 017802

DEPP00019234

>>

>>> On Feb 26, 2015, at 3:57 PM, Tracey Jacobs <jacobs@unitedtalent.com> wrote:

>>>

>>> Sean Bailey did call me. There were 300 extras yesterday. Disney is going to give him 2 days ish to correct the lateness and then there will be a problem. Was he with the foo fighters last night? Xxx

>>>

>>>

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UTA 017903

DEPP00019235

From: Tracey Jacobs /OU=UTAH/OU=RECIPIENTS/CN=JACOBTJ
Sent: Friday, February 27, 2015 12:56 PM
To: 'ed@infilm-nhl.com'
Subject: Re: Johnny / PS

Ok xoxo

~~From: ed@infilm-nhl.com [mailto:ed@infilm-nhl.com]
Sent: Friday, February 27, 2015 12:50 PM
To: Tracey Jacobs
Subject: Re: Johnny / PS~~

The everyday timeliness seems to grow. He told me 1 to 1-1/2 but not two. ~~Was he was 2 1/2 hours later on day and was really~~
I know all off and what he needs to do. I think he knows also. Working on how to get him there but I don't know what to tell you to do so help. I know you could call or email or go thru the guys but not sure how that would go over if it's just telling him what he needs to do to be better. That's not always helpful with all people to be honest.
I can't talk right now nor do I want to relax it all. Perhaps I will get thoughts together in a better way and call you later but I don't want to just talk about what we already know over and over. Sorry. I will find a way to call Sean a bit later for sure. I get it.

Xoxoxo
Types could be me but blaming my phone--sorry!
On Feb 27, 2015, at 12:50 PM, Tracey Jacobs <jacoby1@unitedtelnet.com> wrote:
Jerry said he's been late every day at least 2 hours. ~~(He says) He says he's been late every day at least 2 hours. (He says) He says he's been late every day at least 2 hours.~~ Jerry is very positive about his work, as is the studio but the lateness is undermining all of it. Jerry also referenced the weight which he said is noticeable. ~~In there anything I can do?~~ I also asked Jerry why he isn't there, but he isn't. So the next people who will be talking to him will be Disney and or the directors. Call me when you can speak. x

From: ed@infilm-nhl.com [mailto:ed@infilm-nhl.com]
Sent: Friday, February 27, 2015 12:34 PM
To: Tracey Jacobs
Subject: Re: Johnny / PS

I will see what we can do to make sure he knows and understands. I know he felt bad about the other day so he was mindful of needing to get turned around. What kind of problems could it be?
Types could be me but blaming my phone--sorry!
On Feb 27, 2015, at 12:31 PM, Tracey Jacobs <jacoby1@unitedtelnet.com> wrote:
Brudnerman just called me and said if he's not on time Monday, we have a real problem. I don't know what to do. Jerry isn't there on location so I don't know who will be speaking to him.
From: ed@infilm-nhl.com [mailto:ed@infilm-nhl.com]
Sent: Friday, February 27, 2015 11:54 AM
To: Tracey Jacobs
Subject: Re: Johnny / PS

Yeah, I will call him.
Types could be me but blaming my phone--sorry!
On Feb 27, 2015, at 11:41 AM, Tracey Jacobs <jacoby1@unitedtelnet.com> wrote:
From: ed@infilm-nhl.com [mailto:ed@infilm-nhl.com]
Sent: Friday, February 27, 2015 11:22 AM
To: Tracey Jacobs
Subject: Johnny / PS

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EXHIBIT H2
WITNESS Tracey Jacobs
DATE 2/27/15
KATHY MANNLEIN CSR

CONFIDENTIAL

UTA 017910

DEFP00019237

4. This paragraph contains legal conclusions to which no response is required. To the extent that a response is required, Counterclaim Defendant otherwise admits that this Court has previously determined it has specific personal jurisdiction over the dispute between Counterclaim Defendant and Counterclaim Plaintiff. Counterclaim Defendant denies the remaining allegations in this paragraph.

FACTS

5. Counterclaim Defendant admits that Counterclaim Plaintiff filed documents and sought a temporary restraining order against Counterclaim Defendant in California court, and that such temporary restraining order was granted *ex parte*. Counterclaim Defendant denies the remaining allegations in this paragraph.

6. Counterclaim Defendant denies the allegations in this paragraph.

7. Counterclaim Defendant admits that he wrote “I want her replaced on the WB film” and that “the WB film” referred to *Aquaman*. Counterclaim Defendant denies the remaining allegations in this paragraph, including Counterclaim Plaintiff’s characterization that this statement reflected “his intention to destroy her career,” and any other mischaracterization.

8. Counterclaim Defendant denies the allegations in this paragraph. To the extent that this paragraph contains allegations characterizing the behavior of an unspecified number of unspecified social media accounts, Counterclaim Defendant lacks knowledge and information sufficient to respond and on that basis denies the allegations in this paragraph.

9. Counterclaim Defendant denies the allegations in this paragraph. To the extent that this paragraph contains allegations characterizing the behavior of an unspecified number of unspecified social media accounts, Counterclaim Defendant lacks knowledge and information sufficient to respond and on that basis denies the allegations in this paragraph.

10. Counterclaim Defendant denies the allegations in this paragraph. To the extent that this paragraph contains allegations characterizing the behavior of an unspecified number of unspecified social media accounts, Counterclaim Defendant lacks knowledge and information sufficient to respond and on that basis denies the allegations in this paragraph.

11. Counterclaim Defendant admits that Mr. Waldman may have public associations with one or more persons of Russian origin. Counterclaim otherwise denies the allegations in this paragraph. To the extent that this paragraph contains allegations characterizing the behavior of an unspecified number of social media accounts, Counterclaim Defendant lacks knowledge and information sufficient to respond and on that basis denies the allegations in this paragraph.

12. Counterclaim Defendant denies the allegations in this paragraph. To the extent that this paragraph contains allegations characterizing the behavior of social media accounts, Counterclaim Defendant lacks knowledge and information sufficient to respond and on that basis denies the allegations in this paragraph.

13. Counterclaim Defendant denies the allegations in this paragraph. To the extent that this paragraph contains allegations characterizing the behavior of an unspecified number of social media accounts, which are not specifically identified, Counterclaim Defendant lacks knowledge and information sufficient to respond and on that basis denies the allegations in this paragraph.

14. Counterclaim Defendant denies the allegations in this paragraph. To the extent that this paragraph contains allegations characterizing the behavior of social media accounts, Counterclaim Defendant lacks knowledge and information sufficient to respond and on that basis denies the allegations in this paragraph.

15. Counterclaim Defendant denies the allegations in this paragraph. To the extent that this paragraph contains allegations characterizing the behavior of an unspecified number of social media accounts or the background and qualifications of Catherine Armeecin, Counterclaim Defendant lacks knowledge and information sufficient to respond and on that basis denies the allegations in this paragraph.

16. Counterclaim Defendant denies the allegations in this paragraph.

17. Counterclaim Defendant admits sending the two texts identified in this paragraph to Paul Bettany in 2013, which speak for themselves, and specifically denies Counterclaim Plaintiff's characterization of the same. Counterclaim Defendant denies the remaining allegations in this paragraph.

18. Counterclaim Defendant denies the allegations in this paragraph.

19. Counterclaim Defendant admits sending the referenced text message to Christian Carino, but denies any mischaracterization of its contents.

20. Counterclaim Defendant denies the allegations in this paragraph.

21. Counterclaim Defendant admits making statements containing some or all of the language recited in this paragraph, but denies the remaining allegations of this paragraph, including Counterclaim Plaintiff's characterization of Counterclaim Defendant's statements as a threat or threats.

22. Counterclaim Defendant admits making statements containing the language recited in this paragraph in early 2019, but denies the remaining allegations of this paragraph, including Counterclaim Plaintiff's characterization of Counterclaim Defendant's statements as a threat or threats.

23. Counterclaim Defendant admits the allegations in this paragraph.

24. Counterclaim Defendant admits that a California court awarded Counterclaim Plaintiff an *ex parte* Domestic Violence Restraining Order in 2016 and that the parties' divorce generated extensive press coverage. Counterclaim Defendant otherwise denies the remaining allegations in this paragraph, including Counterclaim Plaintiff's mischaracterizations of the above-captioned litigation.

25. Counterclaim Defendant admits that he contends that Counterclaim Plaintiff lied about being abused by Counterclaim Defendant, and contends that Counterclaim Plaintiff referenced Counterclaim Defendant in the 2018 op-ed in part to gain notoriety. The remainder of this paragraph contains an editorial comment that does not require a response. To the extent any response is required, Counterclaim Defendant denies the remaining allegations in this paragraph.

26. This paragraph contains mischaracterizations and statements of opinion that do not require a response. To the extent that a response is required, Counterclaim Defendant denies the allegations in this paragraph, and denies Counterclaim Plaintiff's mischaracterizations contained therein.

27. This paragraph contains mischaracterizations and statements of opinion that do not require a response. To the extent that a response is required, Counterclaim Defendant denies the allegations in this paragraph, and denies Counterclaim Plaintiff's mischaracterizations contained therein.

28. This paragraph contains mischaracterizations and statements of opinion that do not require a response. To the extent that a response is required, Counterclaim Defendant denies the allegations in this paragraph, and denies Counterclaim Plaintiff's mischaracterizations contained therein.

29. Counterclaim Defendant admits that, as is presumably also true of Counterclaim Plaintiff's attorneys, Adam Waldman has had communications with witnesses. Counterclaim Defendant denies the mischaracterizations and statements of opinion contained in this paragraph, and specifically denies any allegation that a witness has been improperly threatened to "influence their testimony." To the extent that the paragraph's allegations are intended to refer to specific communications between Adam Waldman and any witness, such witnesses and communications are not identified in sufficient detail for Counterclaim Defendant to form knowledge and belief sufficient to respond. Counterclaim Defendant otherwise denies the allegations in this paragraph.

30. Counterclaim Defendant admits that, like Counterclaim Plaintiff's own attorneys, Mr. Waldman has publicly commented about this litigation, and that Mr. Waldman has released one or more declarations in the public sphere. Counterclaim Defendant otherwise denies the allegations in this paragraph, including Counterclaim Plaintiff's mischaracterizations of Mr. Waldman's conduct, and any suggestion that there has been any attempt by Counterclaim Defendant to "mislead the public."

31. Counterclaim Defendant admits that he recently joined Instagram and quickly gained a large following. The remainder of this paragraph contains mischaracterizations and statements of opinion that do not require a response. To the extent a response is required, Counterclaim Defendant denies the remaining allegations in this paragraph, including specifically the allegation that the act of joining Instagram is somehow a "plan to harass and intimidate Ms. Heard."

32. Counterclaim Defendant admits that his first video message on Instagram made reference to Counterclaim Plaintiff and this lawsuit. The remainder of this paragraph contains

mischaracterizations and statements of opinion that do not require a response. To the extent a response is required, Counterclaim Defendant denies the remaining allegations in this paragraph.

33. With respect to the allegations in this paragraph, Counterclaim Defendant responds that the Court has granted Counterclaim Defendant's Plea in Bar as to the allegedly defamatory statements referenced in the Counterclaim as Statements A-E, including the statements referenced in this paragraph. As such, no response to the allegations in this paragraph is required. To the extent that any response is required, Counterclaim Defendant admits that a GQ journalist interviewed him prior to November 2018 and states that the journalist's name was Jonathan Heaf, as is reflected in Exhibit A to the Counterclaim. Counterclaim Defendant admits that the article included the statements by the author "the truth Johnny Depp wants you to hear" and "angry – angry about a lot of things – and he's vengeful." Counterclaim Defendant otherwise responds that Exhibit A to the Counterclaim speaks for itself, and denies the remaining allegations in this paragraph.

34. With respect to the allegations in this paragraph, Counterclaim Defendant responds that the Court has granted Counterclaim Defendant's Plea in Bar as to the allegedly defamatory statements referenced in the Counterclaim as Statements A-E, including the statements referenced in this paragraph. As such, no response to the allegations in this paragraph is required. To the extent that any response is required, Counterclaim Defendant denies the allegations in this paragraph. The quotes as written in the Counterclaim do not appear in Exhibit A, which speaks for itself. Counterclaim Defendant further denies Counterclaim Plaintiff's characterizations of the statements as false.

35. With respect to the allegations in this paragraph, Counterclaim Defendant responds that the Court has granted Counterclaim Defendant's Plea in Bar as to the allegedly

defamatory statements referenced in the Counterclaim as Statements A-E, including the statements referenced in this paragraph. As such, no response to the allegations in this paragraph is required. Counterclaim Defendant further responds that this paragraph amounts to an editorial comment, not a factual allegation. To the extent that any response is required, Counterclaim Defendant admits that the article attached to the Counterclaim as Exhibit A contains the quoted statement made by the author. Counterclaim Defendant denies the remaining allegations in this paragraph, including Counterclaim Plaintiff's characterization of the statement as an "acknowledg[ment]."

36. With respect to the allegations in this paragraph, Counterclaim Defendant responds that the Court has granted Counterclaim Defendant's Plea in Bar as to the allegedly defamatory statements referenced in the Counterclaim as Statements A-E, including the statements referenced in this paragraph. As such, no response to the allegations in this paragraph is required. To the extent that any response is required, Counterclaim Defendant admits that the author, Mr. Heaf, stated in the article "Let me be clear: this is not a piece of investigative reporting." Counterclaim Defendant denies the remaining allegations in this paragraph.

37. Counterclaim Defendant admits that Counterclaim Plaintiff published an op-ed in the Washington Post in December 2018 "calling for 'changes to laws and rules and social norms' so that 'women who come forward to talk about violence receive more support.'" Counterclaim Defendant responds that the remainder of this paragraph contains characterizations of the op-ed in question, which speaks for itself. Counterclaim Defendant denies the remaining allegations in this paragraph.

38. This paragraph contains legal conclusions to which no response is required. To the extent a response is required, Counterclaim Defendant denies the allegations in this paragraph.

39. Counterclaim Defendant admits that his name does not appear in Counterclaim Plaintiff's 2018 Washington Post op-ed, but specifically denies any suggestion that the op-ed was not intended and widely understood to refer to Counterclaim Defendant. To the extent that the remaining allegations in this paragraph merely characterize the op-ed in question, Counterclaim Defendant responds that the op-ed speaks for itself. Counterclaim Defendant denies the remaining allegations in this paragraph.

40. This paragraph primarily contains editorial comments and mischaracterizations, which do not require a response. To the extent a response is required, Counterclaim Defendant admits that he filed a defamation lawsuit on March 1, 2019 related to Counterclaim Plaintiff's Washington Post op-ed. Counterclaim Defendant otherwise denies the remaining allegations in this paragraph.

41. Counterclaim Defendant denies the allegations in this paragraph. By such denial Counterclaim Defendant does not waive and specifically asserts the attorney client privilege as to any all communications and/or scope of engagement between Counterclaim Defendant and his attorney Mr. Waldman, including without limitation to the extent that this paragraph could be construed to allege that particular conduct by Mr. Waldman was authorized by Counterclaim Defendant or done at his direction. For that reason, beyond this general denial, Counterclaim Defendant is not obligated to and will not respond further to the allegations contained in this paragraph.

42. With respect to the allegations in this paragraph, Counterclaim Defendant responds that the Court has granted Counterclaim Defendant's Plea in Bar as to the allegedly defamatory statements referenced in the Counterclaim as Statements A-E, including the statements referenced in this paragraph. As such, no response to the allegations in this paragraph is required. To the extent that any response is required, Counterclaim Defendant admits that the quoted statement appeared in an article that was published April 12, 2019 and was attributed to Adam Waldman. To the extent that the allegations in this paragraph could be construed to inquire into the communications and/or scope of engagement between Counterclaim Defendant and his attorney Mr. Waldman, including without limitation to the extent that this paragraph could be construed to allege that particular conduct by Mr. Waldman was authorized by Counterclaim Defendant or done at his direction, Counterclaim Defendant expressly asserts the attorney-client privilege, and beyond this general denial is not obligated to and will not respond further to the remaining allegations in this paragraph.

43. With respect to the allegations in this paragraph, Counterclaim Defendant responds that the Court has granted Counterclaim Defendant's Plea in Bar as to the allegedly defamatory statements referenced in the Counterclaim as Statements A-E, including the statements referenced in this paragraph. As such, no response to the allegations in this paragraph is required. To the extent that any response is required, this paragraph contains legal conclusions to which no response is required. Counterclaim Defendant admits the quoted statement appeared in Blast and was attributed to Adam Waldman. To the extent that the allegations in this paragraph could be construed to inquire into the communications and/or scope of engagement between Counterclaim Defendant and his attorney Mr. Waldman, including without limitation to the extent that this paragraph could be construed to allege that particular conduct by Mr.

Waldman was authorized by Counterclaim Defendant or done at his direction, Counterclaim Defendant expressly asserts the attorney-client privilege, and beyond this general denial is not obligated to and will not respond further to the remaining allegations in this paragraph.

44. With respect to the allegations in this paragraph, Counterclaim Defendant responds that the Court has granted Counterclaim Defendant's Plea in Bar as to the allegedly defamatory statements referenced in the Counterclaim as Statements A-E, including the statements referenced in this paragraph. As such, no response to the allegations in this paragraph is required. To the extent that any response is required, Counterclaim Defendant admits that the quote "Ms. Heard's 'battered face' was a hoax" appeared in People magazine on July 3, 2019 and is attributed to Adam Waldman. To the extent that the allegations in this paragraph could be construed to inquire into the communications and/or scope of engagement between Counterclaim Defendant and his attorney Mr. Waldman, including without limitation to the extent that this paragraph could be construed to allege that particular conduct by Mr. Waldman was authorized by Counterclaim Defendant or done at his direction, Counterclaim Defendant expressly asserts the attorney-client privilege, and beyond this general denial is not obligated to and will not respond further to the remaining allegations in this paragraph.

45. Counterclaim Defendant admits that the quoted language appeared in a Daily Mail article published on April 8, 2020 and is attributed to Adam Waldman. To the extent that the allegations in this paragraph could be construed to inquire into the communications and/or scope of engagement between Counterclaim Defendant and his attorney Mr. Waldman, including without limitation to the extent that this paragraph could be construed to allege that particular conduct by Mr. Waldman was authorized by Counterclaim Defendant or done at his direction, Counterclaim Defendant expressly asserts the attorney-client privilege, and beyond this general

denial is not obligated to and will not respond further to the remaining allegations in this paragraph.

46. Counterclaim Defendant admits that the quoted language appeared in a Daily Mail article published on April 27, 2020 and is attributed to Adam Waldman. To the extent that the allegations in this paragraph could be construed to inquire into the communications and/or scope of engagement between Counterclaim Defendant and his attorney Mr. Waldman, including without limitation to the extent that this paragraph could be construed to allege that particular conduct by Mr. Waldman was authorized by Counterclaim Defendant or done at his direction, Counterclaim Defendant expressly asserts the attorney-client privilege, and beyond this general denial is not obligated to and will not respond further to the remaining allegations in this paragraph.

47. Counterclaim Defendant admits that the phrase “abuse hoax” appeared in a Daily Mail article published on June 24, 2020 and that such quote is attributed to Adam Waldman. To the extent that the allegations in this paragraph could be construed to inquire into the communications and/or scope of engagement between Counterclaim Defendant and his attorney Mr. Waldman, including without limitation to the extent that this paragraph could be construed to allege that particular conduct by Mr. Waldman was authorized by Counterclaim Defendant or done at his direction, Counterclaim Defendant expressly asserts the attorney-client privilege, and beyond this general denial is not obligated to and will not respond further to the remaining allegations in this paragraph.

48. Counterclaim Defendant admits that the quoted language and a picture appeared on Adam Waldman’s twitter account on July 22, 2020. To the extent that the allegations in this paragraph could be construed to inquire into the communications and/or scope of engagement

between Counterclaim Defendant and his attorney Mr. Waldman, including without limitation to the extent that this paragraph could be construed to allege that particular conduct by Mr. Waldman was authorized by Counterclaim Defendant or done at his direction, Counterclaim Defendant expressly asserts the attorney-client privilege, and beyond this general denial is not obligated to and will not respond further to the remaining allegations in this paragraph.

49. Counterclaim Defendant admits that the quoted language and picture appeared on Adam Waldman's twitter. To the extent that the allegations in this paragraph could be construed to inquire into the communications and/or scope of engagement between Counterclaim Defendant and his attorney Mr. Waldman, including without limitation to the extent that this paragraph could be construed to allege that particular conduct by Mr. Waldman was authorized by Counterclaim Defendant or done at his direction, Counterclaim Defendant expressly asserts the attorney-client privilege, and beyond this general denial is not obligated to and will not respond further to the remaining allegations in this paragraph.

50. This paragraph contains legal conclusions to which no response is required. To the extent a response is required, Counterclaim Defendant denies the allegations in this paragraph.

51. This paragraph contains legal conclusions to which no response is required. To the extent a response is required, Counterclaim Defendant denies the allegations in this paragraph.

52. This paragraph contains legal conclusions to which no response is required. To the extent a response is required, Counterclaim Defendant denies the allegations in this paragraph. To the extent that the allegations in this paragraph could be construed to inquire into the communications and/or scope of engagement between Counterclaim Defendant and his

attorney Mr. Waldman, including to the extent that this paragraph could be construed to allege that particular conduct by Mr. Waldman was authorized by Counterclaim Defendant or done at his direction, Counterclaim Defendant expressly asserts the attorney-client privilege and work-product doctrine, and is not obligated to respond, and on that basis denies the same.

53. Counterclaim Defendant admits that the Counterclaim sought the relief identified in this paragraph, although Counterclaim Defendant notes that the wrong Virginia Code provision is cited.

54. Counterclaim Defendant admits that the Counterclaim seeks compensatory and punitive damages. Counterclaim Defendant denies the remaining allegations in this paragraph.

**COUNT ONE –
DECLARATORY JUDGMENT UNDER VA CODE §§ 8.01-184, et seq.**

55. Counterclaim Defendant responds that the Court has sustained a Demurrer and dismissed Count One in its entirety. As such, no response to the allegations in this paragraph is required. To the extent a response is required, Counterclaim Defendant repeats and incorporates each of his responses to the allegations contained in the foregoing paragraphs as if set forth fully herein.

56. Counterclaim Defendant responds that the Court has sustained a Demurrer and dismissed Count One in its entirety. As such, no response to the allegations in this paragraph is required. This paragraph contains legal conclusions to which no response is required and is moot following the dismissal of Count One, and on that basis, Counterclaim Defendant denies the allegations in this paragraph.

57. Counterclaim Defendant responds that the Court has sustained a Demurrer and dismissed Count One in its entirety. As such, no response to the allegations in this paragraph is required. This paragraph contains legal conclusions to which no response is required and is moot

following the dismissal of Count One, and on that basis, Counterclaim Defendant denies the allegations in this paragraph.

58. Counterclaim Defendant responds that the Court has sustained a Demurrer and dismissed Count One in its entirety. As such, no response to the allegations in this paragraph is required. This paragraph contains legal conclusions to which no response is required and is moot following the dismissal of Count One, and on that basis, Counterclaim Defendant denies the allegations in this paragraph. To the extent any other response is required, Counterclaim Defendant denies that Counterclaim Plaintiff's claim for declaratory relief was appropriate.

59. Counterclaim Defendant responds that the Court has sustained a Demurrer and dismissed Count One in its entirety. As such, no response to the allegations in this paragraph is required. This paragraph contains legal conclusions to which no response is required and is moot following the dismissal of Count One, and on that basis, Counterclaim Defendant denies the allegations in this paragraph. To the extent any other response is required, Counterclaim Defendant denies allegations in this paragraph.

60. Counterclaim Defendant responds that the Court has sustained a Demurrer and dismissed Count One in its entirety. As such, no response to the allegations in this paragraph is required. This paragraph contains legal conclusions to which no response is required and is moot following the dismissal of Count One, and on that basis, Counterclaim Defendant denies the allegations in this paragraph. To the extent that any other response is required, Counterclaim Defendant denies that Counterclaim Plaintiff is entitled to attorneys' fees or costs.

61. Counterclaim Defendant responds that the Court has sustained a Demurrer and dismissed Count One in its entirety. As such, no response to the allegations in this paragraph is required. This paragraph contains legal conclusions to which no response is required and is moot

following the dismissal of Count One, and on that basis, Counterclaim Defendant denies the allegations in this paragraph.

**COUNT TWO –
DEFAMATION AND DEFAMATION *PER SE***

62. Counterclaim Defendant repeats and incorporates each of his responses to the allegations contained in the foregoing paragraphs as if set forth fully herein.

63. This paragraph contains legal conclusions to which no response is required. Counterclaim Defendant otherwise denies the allegations in this paragraph and further states as follows:

(a) With respect to the allegations in this subparagraph, Counterclaim Defendant responds that the Court has granted Counterclaim Defendant's Plea in Bar as to the allegedly defamatory statements referenced in the Counterclaim as Statements A-E, including the statements referenced in this subparagraph. As such, no response to the allegations in this subparagraph is required. To the extent that any response is required, Counterclaim Defendant admits that the GQ article attached to the Counterclaim as Exhibit A contains the quote "there's no truth to it whatsoever" and that the "it" refers to Counterclaim Plaintiff's abuse allegations. Counterclaim Defendant denies the remaining allegations in this subparagraph.

(b) With respect to the allegations in this subparagraph, Counterclaim Defendant responds that the Court has granted Counterclaim Defendant's Plea in Bar as to the allegedly defamatory statements referenced in the Counterclaim as Statements A-E, including the statements referenced in this subparagraph. As such, no response to the allegations in this subparagraph is required. To the extent that any response is required, Counterclaim Defendant admits that the GQ article attached to the Counterclaim as Exhibit A contains the quoted language. Counterclaim Defendant denies the remaining allegations in this subparagraph.

(c) With respect to the allegations in this subparagraph, Counterclaim Defendant responds that the Court has granted Counterclaim Defendant's Plea in Bar as to the allegedly defamatory statements referenced in the Counterclaim as Statements A-E, including the statements referenced in this subparagraph. As such, no response to the allegations in this subparagraph is required. To the extent that any response is required, Counterclaim Defendant admits that the GQ article attached to the Counterclaim as Exhibit A contains the quoted language. Counterclaim Defendant denies the remaining allegations in this subparagraph.

64. With respect to the allegations in this paragraph, Counterclaim Defendant responds that the Court has granted Counterclaim Defendant's Plea in Bar as to the allegedly defamatory statements referenced in the Counterclaim as Statements A-E, including the statements referenced in this paragraph. As such, no response to the allegations in this paragraph is required. To the extent that any response would otherwise be required, this paragraph contains legal conclusions to which no response is required. Counterclaim Defendant otherwise denies the allegations in this paragraph.

65. With respect to the allegations in this paragraph, Counterclaim Defendant responds that the Court has granted Counterclaim Defendant's Plea in Bar as to the allegedly defamatory statements referenced in the Counterclaim as Statements A-E, including the statements referenced in this paragraph. As such, no response to the allegations in this paragraph is required. To the extent that any response would otherwise be required, this paragraph merely quotes an editorial comment, to which no response is necessary. Counterclaim Defendant admits that the GQ article attached to the Counterclaim as Exhibit A contains the quoted language. Counterclaim Defendant denies the remaining allegations in this paragraph.

66. With respect to the allegations in this paragraph, Counterclaim Defendant responds that the Court has granted Counterclaim Defendant's Plea in Bar as to the allegedly defamatory statements referenced in the Counterclaim as Statements A-E, including the statements referenced in this paragraph. As such, no response to the allegations in this paragraph is required. To the extent that any response would otherwise be required, this paragraph contains legal conclusions to which no response is required. To the extent that the allegations in this paragraph could be construed to inquire into the communications and/or scope of engagement between Counterclaim Defendant and his attorney Mr. Waldman, including to the extent that this paragraph could be construed to allege that particular conduct by Mr. Waldman was performed as an agent or was authorized by Counterclaim Defendant or done at his direction, Counterclaim Defendant expressly asserts the attorney-client privilege and work-product doctrine, and is not obligated to respond, and on that basis denies the same. Counterclaim Defendant otherwise denies the allegations in this paragraph and further states as follows:

(a) With respect to the allegations in this subparagraph, Counterclaim Defendant responds that the Court has granted Counterclaim Defendant's Plea in Bar as to the allegedly defamatory statements referenced in the Counterclaim as Statements A-E, including the statements referenced in this subparagraph. As such, no response to the allegations in this subparagraph is required. To the extent that any response would otherwise be required, Counterclaim Defendant admits that the quoted statement appeared in an article that was published April 12, 2019 and is attributed to Adam Waldman. To the extent that the allegations in this paragraph could be construed to inquire into the communications and/or scope of engagement between Counterclaim Defendant and his attorney Mr. Waldman, including to the extent that this paragraph could be construed to allege that particular conduct by Mr. Waldman

was performed as an agent or was authorized by Counterclaim Defendant or done at his direction, Counterclaim Defendant expressly asserts the attorney-client privilege and work-product doctrine, and is not obligated to respond, and on that basis denies the same. Counterclaim Defendant denies the remaining allegations in this subparagraph.

(b) With respect to the allegations in this subparagraph, Counterclaim Defendant responds that the Court has granted Counterclaim Defendant's Plea in Bar as to the allegedly defamatory statements referenced in the Counterclaim as Statements A-E, including the statements referenced in this subparagraph. As such, no response to the allegations in this subparagraph is required. To the extent that any response would otherwise be required, Counterclaim Defendant admits the quoted statement appeared in Blast and is attributed to Adam Waldman. To the extent that the allegations in this paragraph could be construed to inquire into the communications and/or scope of engagement between Counterclaim Defendant and his attorney Mr. Waldman, including to the extent that this paragraph could be construed to allege that particular conduct by Mr. Waldman was performed as an agent or was authorized by Counterclaim Defendant or done at his direction, Counterclaim Defendant expressly asserts the attorney-client privilege and work-product doctrine, and is not obligated to respond, and on that basis denies the same. Counterclaim Defendant denies the remaining allegations in this paragraph.

(c) With respect to the allegations in this subparagraph, Counterclaim Defendant responds that the Court has granted Counterclaim Defendant's Plea in Bar as to the allegedly defamatory statements referenced in the Counterclaim as Statements A-E, including the statements referenced in this subparagraph. As such, no response to the allegations in this subparagraph is required. To the extent that any response would otherwise be required,

Counterclaim Defendant admits that the quote “Ms. Heard’s ‘battered face’ was a hoax” appeared in People magazine on July 3, 2019 and is attributed to Adam Waldman. To the extent that the allegations in this paragraph could be construed to inquire into the communications and/or scope of engagement between Counterclaim Defendant and his attorney Mr. Waldman, including to the extent that this paragraph could be construed to allege that particular conduct by Mr. Waldman was performed as an agent or was authorized by Counterclaim Defendant or done at his direction, Counterclaim Defendant expressly asserts the attorney-client privilege and work-product doctrine, and is not obligated to respond, and on that basis denies the same. Counterclaim Defendant denies the remaining allegations in this paragraph.

(d) Counterclaim Defendant admits that the quoted language appeared in a Daily Mail article published on April 8, 2020 and is attributed to Adam Waldman. To the extent that the allegations in this paragraph could be construed to inquire into the communications and/or scope of engagement between Counterclaim Defendant and his attorney Mr. Waldman, including to the extent that this paragraph could be construed to allege that particular conduct by Mr. Waldman was performed as an agent or was authorized by Counterclaim Defendant or done at his direction, Counterclaim Defendant expressly asserts the attorney-client privilege and work-product doctrine, and is not obligated to respond, and on that basis denies the same. Counterclaim Defendant denies the remaining allegations in this paragraph.

(e) Counterclaim Defendant admits that the quoted language appeared in a Daily Mail article published on April 27, 2020 and is attributed to Adam Waldman. To the extent that the allegations in this paragraph could be construed to inquire into the communications and/or scope of engagement between Counterclaim Defendant and his attorney Mr. Waldman, including to the extent that this paragraph could be construed to allege that particular conduct by Mr.

Waldman was performed as an agent or was authorized by Counterclaim Defendant or done at his direction, Counterclaim Defendant expressly asserts the attorney-client privilege and work-product doctrine, and is not obligated to respond, and on that basis denies the same. Counterclaim Defendant denies the remaining allegations in this paragraph.

(f) Counterclaim Defendant admits that the phrase “abuse hoax” appeared in a Daily Mail article published on June 24, 2020 and that such quote is attributed to Adam Waldman. To the extent that the allegations in this paragraph could be construed to inquire into the communications and/or scope of engagement between Counterclaim Defendant and his attorney Mr. Waldman, including to the extent that this paragraph could be construed to allege that particular conduct by Mr. Waldman was performed as an agent or was authorized by Counterclaim Defendant or done at his direction, Counterclaim Defendant expressly asserts the attorney-client privilege and work-product doctrine, and is not obligated to respond, and on that basis denies the same. Counterclaim Defendant denies the remaining allegations in this paragraph.

67. This paragraph contains legal conclusions to which no response is required. To the extent that the allegations in this paragraph could be construed to inquire into the communications and/or scope of engagement between Counterclaim Defendant and his attorney Mr. Waldman, including to the extent that this paragraph could be construed to allege that particular conduct by Mr. Waldman was performed as an agent or was authorized by Counterclaim Defendant or done at his direction, Counterclaim Defendant expressly asserts the attorney-client privilege and work-product doctrine, and is not obligated to respond, and on that basis denies the same. Counterclaim Defendant otherwise denies the allegations in this paragraph.

68. This paragraph contains legal conclusions to which no response is required. To the extent that the allegations in this paragraph could be construed to inquire into the communications and/or scope of engagement between Counterclaim Defendant and his attorney Mr. Waldman, including to the extent that this paragraph could be construed to allege that particular conduct by Mr. Waldman was performed as an agent or was authorized by Counterclaim Defendant or done at his direction, Counterclaim Defendant expressly asserts the attorney-client privilege and work-product doctrine, and is not obligated to respond, and on that basis denies the same. Counterclaim Defendant otherwise denies the allegations in this paragraph.

69. This paragraph contains legal conclusions to which no response is required. To the extent that the allegations in this paragraph could be construed to inquire into the communications and/or scope of engagement between Counterclaim Defendant and his attorney Mr. Waldman, including to the extent that this paragraph could be construed to allege that particular conduct by Mr. Waldman was performed as an agent or was authorized by Counterclaim Defendant or done at his direction, Counterclaim Defendant expressly asserts the attorney-client privilege and work-product doctrine, and is not obligated to respond, and on that basis denies the same. Counterclaim Defendant otherwise denies the allegations in this paragraph.

70. To the extent that the allegations in this paragraph could be construed to inquire into the communications and/or scope of engagement between Counterclaim Defendant and his attorney Mr. Waldman, including to the extent that this paragraph could be construed to allege that particular conduct by Mr. Waldman was performed as an agent or was authorized by Counterclaim Defendant or done at his direction, Counterclaim Defendant expressly asserts the

attorney-client privilege and work-product doctrine, and is not obligated to respond, and on that basis denies the same. Counterclaim Defendant otherwise denies the allegations in this paragraph.

71. This paragraph contains legal conclusions to which no response is required. Counterclaim Defendant otherwise denies the allegations in this paragraph.

72. This paragraph contains legal conclusions to which no response is required. Counterclaim Defendant otherwise denies the allegations in this paragraph.

**COUNT THREE –
VIOLATION OF THE VIRGINIA COMPUTER CRIMES ACT**

73. Counterclaim Defendant responds that the Court sustained a demurrer and dismissed Count Three of the Counterclaim in its entirety. As such, the allegations in this paragraph are moot and no response is required. To the extent that any response is required, Counterclaim Defendant repeats and incorporates each of his responses to the allegations contained in the foregoing paragraphs as if set forth fully herein.

74. Counterclaim Defendant responds that the Court sustained a demurrer and dismissed Count Three of the Counterclaim in its entirety. As such, the allegations in this paragraph are moot and no response is required. To the extent that any response is required, this paragraph contains abstract assertions of legal to which no response is required.

75. Counterclaim Defendant responds that the Court sustained a demurrer and dismissed Count Three of the Counterclaim in its entirety. As such, the allegations in this paragraph are moot and no response is required. To the extent that any response is required, this paragraph contains abstract assertions of legal to which no response is required.

76. Counterclaim Defendant responds that the Court sustained a demurrer and dismissed Count Three of the Counterclaim in its entirety. As such, the allegations in this

paragraph are moot and no response is required. To the extent that any response is required, Counterclaim Defendant denies the allegations in this paragraph. To the extent that the allegations in this paragraph could be construed to inquire into the communications and/or scope of engagement between Counterclaim Defendant and his attorney Mr. Waldman, including to the extent that this paragraph could be construed to allege that particular conduct by Mr. Waldman was performed as an agent or was authorized by Counterclaim Defendant or done at his direction, Counterclaim Defendant expressly asserts the attorney-client privilege and work-product doctrine, and is not obligated to respond, and on that basis denies the same.

77. Counterclaim Defendant responds that the Court sustained a demurrer and dismissed Count Three of the Counterclaim in its entirety. As such, the allegations in this paragraph are moot and no response is required. To the extent that any response is required, this paragraph contains legal conclusions to which no response is required. Counterclaim Defendant otherwise denies the allegations in this paragraph.

78. Counterclaim Defendant responds that the Court sustained a demurrer and dismissed Count Three of the Counterclaim in its entirety. As such, the allegations in this paragraph are moot and no response is required. To the extent that any response is required, this paragraph contains legal conclusions to which no response is required. Counterclaim Defendant otherwise denies the allegations in this paragraph.

79. Counterclaim Defendant responds that the Court sustained a demurrer and dismissed Count Three of the Counterclaim in its entirety. As such, the allegations in this paragraph are moot and no response is required. To the extent that any response is required, this paragraph contains legal conclusions to which no response is required. Counterclaim Defendant otherwise denies the allegations in this paragraph.

With respect to the allegations contained in Counterclaim Plaintiff's requests for relief following paragraph 79, Counterclaim Defendant denies any legal assertions therein, and denies that Counterclaim Plaintiff is entitled to any relief from Counterclaim Defendant in this action, and demands strict proof thereof. Counterclaim Defendant further denies that Counterclaim Plaintiff would be entitled to expenses and costs, including attorneys' fees, under any legal theory.

Counterclaim Defendant sets forth below his affirmative defenses. By asserting the defenses below, Counterclaim Defendant does not assume the burden of proving any fact or issue of law where such burden properly belongs to Counterclaim Plaintiff.

GROUND OF DEFENSE
(Affirmative and Other Defenses)

FIRST DEFENSE

The Counterclaim fails to state a claim upon which relief can be granted and requests relief which is not permitted as a matter of law.

SECOND DEFENSE

Counterclaim Plaintiff has not suffered any monetary or financial loss for which she can be compensated.

THIRD DEFENSE

The statements forming the basis of the Counterclaim are not false and defamatory because they were truthful.

FOURTH DEFENSE

The statements forming the basis of the Counterclaim were not made by the Counterclaim Defendant.

FIFTH DEFENSE

Counterclaim Defendant does not waive and specifically asserts the attorney client privilege as to all communications between Counterclaim Defendant and his attorney, Mr. Waldman. If and when the Court enters a final order in this case that communications between Counterclaim Defendant and his attorney, Mr. Waldman as to whether or not there was authorization from Counterclaim Defendant to, or a conspiracy with, Mr. Waldman to make the statements forming the basis of the Counterclaim, are not subject to attorney client privilege, or may be disclosed for the limited purpose of asserting certain affirmative defenses and without a general waiver of the attorney client privilege, or required disclosure of any communications (or lack of communications) beyond those necessary to support such affirmative defenses, Counterclaim Defendant reserves the right to assert any and all affirmative defenses based on Counterclaim Defendant's lack of direction as to the subject statements, lack of direction or control of a third party as to the subject statements, a third party's exceeding of the scope of employment or agency relationship as to the subject statements, and statements made by an independent contractor.

SIXTH DEFENSE

The doctrine of unclean hands equitably bars the Counterclaim.

SEVENTH DEFENSE

The doctrine of laches equitably bars the Counterclaim.

EIGHTH DEFENSE

The doctrine of equitable estoppel bars the Counterclaim.

NINTH DEFENSE

Failure to join a necessary or indispensable party.

TENTH DEFENSE

Counterclaim Plaintiff is a public figure and any allegedly defamatory statements made or allegedly attributable to Counterclaim Defendant were not made with malice.

ELEVENTH DEFENSE

The alleged statements that form the basis of the Counterclaim are statements of opinion and are protected speech, and Counterclaim Defendant seeks an award of his reasonable attorneys' fees and costs pursuant to Virginia's antic-SLAPP Statute.

TWELFTH DEFENSE

Counterclaim Plaintiff has failed to take reasonable steps to mitigate her alleged damages, if any.

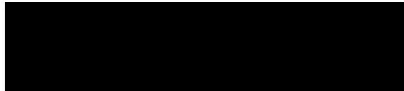
THIRTEENTH DEFENSE

Counterclaim Defendant reserves the right to interpose such additional affirmative defenses as may be appropriate including, without limitation the matters set forth in the Fifth Affirmative Defense, above.

WHEREFORE, Counterclaim Defendant respectfully requests that the Counterclaim be dismissed with prejudice.

JURY TRIAL DEMAND

Counterclaim Defendant hereby demands a jury trial on all issues so triable.



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
Email: bchew@brownrudnick.com

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

Counsel for Plaintiff John C. Depp, II

Dated: January 22, 2021



VIRGINIA:

IN THE CIRCUIT COURT OF FAIRFAX COUNTY

John C. Depp, II,)
)
 Plaintiff,)
)
 v.)
)
 Amber Laura Heard,)
)
 Defendant.)
)
 _____)

Civil Action No.: CL-2019-0002911

**PLAINTIFF'S OPPOSITION TO DEFENDANT'S MOTION
TO CERTIFY AUGUST 17, 2021 ORDER FOR INTERLOCUTORY APPEAL**

against Mr. Depp, which would not be resolved if the UK Judgment were afforded preclusive effect.

As Ms. Heard recognizes in her Motion, she could not use the UK Judgment *offensively* to bar Mr. Depp from defending against her counterclaim because the mutuality requirement should be strictly applied when offensive collateral estoppel is invoked. *See* Mot. at 4 (“For obvious reasons, it is far more important that mutuality apply to offensive collateral estoppel to prevent defendants who never had a day in court in one case from being adjudged liable in a latter case.”); *see also Norfolk & W. Ry. Co. v. Baily Lumber Co.*, 221 Va. 638, 641-42 (1980). In any event, even if the UK Judgment precluded Mr. Depp from relitigating whether Ms. Heard’s claims of abuse are false (which it decidedly does not), it would not resolve Ms. Heard’s surviving counterclaim against Mr. Depp. Ms. Heard’s surviving counterclaim is a claim for defamation, based on statements made by Mr. Depp’s attorney, which are of a different nature than the statements which are the subject of Mr. Depp’s defamation claims. The UK Judgment, accordingly, would not preclude the parties from litigating whether the statements which are the subject of Ms. Heard’s defamation counterclaims are true or false. **Moreover, although Ms. Heard alleges the purportedly defamatory statements were made by “Mr. Depp, through his attorney,” this is a hotly disputed fact which would still need to be litigated.** In sum, even if Ms. Heard successfully appealed the Order, a material aspect of this action would remain pending before this Court.

3. *There is No Substantial Ground for Difference of Opinion on Whether the UK Judgment Precludes Mr. Depp’s Defamation Claims and There is Clear, Controlling Precedent on this Point*

Finally, Ms. Heard’s Motion to certify the Order interlocutory appeal should be denied because Virginia law is clear that this Court need not recognize the preclusive effect of the UK Judgment. The Court’s Letter Opinion, which thoroughly addressed controlling Virginia

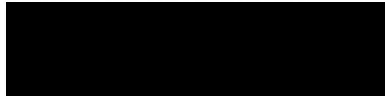
(“Because this appeal is interlocutory and frivolous, we grant the motion for sanctions in the form of single costs and attorney’s fees in favor of the appellees.”).

Virginia law does not countenance a party submitting a pleading or motion that is unfounded in fact or law and interposed to “harass or to cause unnecessary delay or needless increase in the cost of litigation.” *See* Va. Code § 8.01-271.1. Yet, this is precisely what Ms. Heard has done with her Motion. Ms. Heard’s Supplemental Plea was “misguided” and “thinly supported” in the first place and the Court’s Letter Opinion clearly and thoroughly set out the controlling Virginia precedent demonstrating why this was the case. *See generally* Letter Opinion (“This is not a matter of first impression; it is a matter of stare decisis.”). In the face of the Court’s Letter Opinion, Ms. Heard cannot in good faith contend, as she does in her Motion, that there is no controlling Virginia precedent, or substantial grounds for differing opinions, that precluded the relief she sought in her Supplemental Plea. Thus, Ms. Heard’s sole purpose in bringing this Motion to appeal the Court’s Order denying her Supplemental Plea must be solely to unnecessarily delay and needlessly increase the costs of this litigation for Mr. Depp, as she has done time and time again throughout this case. Ms. Heard can and should be sanctioned for this conduct.

CONCLUSION

For the foregoing reasons, Mr. Depp respectfully requests that the Court deny Ms. Heard’s Motion and impose sanctions on her for filing this frivolous Motion in the first place.

Respectfully submitted,


Benjamin G. Chew (VSB #29113)
Andrew C. Crawford (VSB # 89093)

BROWN RUDNICK LLP
601 Thirteenth Street NW, Suite 600
Washington, DC 20005
Tel.: (202) 536-1785
Fax: (617) 289-0717
bchew@brownrudnick.com
acrawford@brownrudnick.com

Leo J. Presiado (admitted *pro hac vice*)
Camille M. Vasquez (admitted *pro hac vice*)
Samuel A. Moniz (admitted *pro hac vice*)
BROWN RUDNICK LLP
2211 Michelson Drive
Irvine, CA 92612
Tel.: (949) 752-7100
Fax: (949) 252-1514
lpresiado@brownrudnick.com
cvasquez@brownrudnick.com
smoniz@brownrudnick.com

Jessica N. Meyers (admitted *pro hac vice*)
BROWN RUDNICK LLP
7 Times Square
New York, New York 10036
Tel.: (212) 209-4800
Fax: (212) 209-4801
jmeyers@brownrudnick.com

*Counsel for Plaintiff and
Counterclaim Defendant John C. Depp, II*

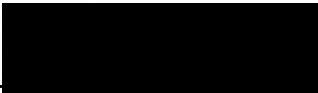
Dated: September 29, 2021

CERTIFICATE OF SERVICE

I hereby certify that on this 29th day of September 2021, I caused copies of the foregoing to be served via email (per written agreement between the Parties) on the following:

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
brottenborn@woodsrogers.com
jtreece@woodsrogers.com

Elaine Charlson Bredehoft (VSB No. 23766)
Adam S. Nadelhaft (VSB No. 91717)
Clarissa K. Pintado (VSB No. 86882)
David E. Murphy (VSB No. 90938)
CHARLSON BREDEHOFT COHEN &
BROWN, P.C.
11260 Roger Bacon Dr., Suite 201
Reston, VA 20190
Phone: 703-318-6800
Fax: 703-318-6808
ebredehoft@cbcblaw.com
anadelhaft@cbcblaw.com
cpintado@cbcblaw.com
dmurphy@cbcblaw.com



Benjamin G. Chew



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Transcript of Hearing

Date: October 29, 2021

Case: Depp, II -v- Heard

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Phone: 888.433.3767

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VIRGINIA:

IN THE CIRCUIT COURT OF FAIRFAX COUNTY

-----x

JOHN C. DEPP, II, :

Plaintiff, :

v. : Case No.

AMBER LAURA HEARD, : CL-2019-0002911

Defendant. :

-----x

HEARING

Before the Honorable PENNEY AZCARATE

Fairfax, Virginia

Friday, October 29, 2021

11:35 a.m.

Job No.: 409115

Pages: 1 - 71

Reported by: Carol A. Lowe, RPR

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A P P E A R A N C E S

ON BEHALF OF THE PLAINTIFF:

BENJAMIN G. CHEW, ESQUIRE

BROWN RUDNICK

601 Thirteenth Street, Northwest

Suite 600

Washington, D.C. 20005

(202) 536-1700

1 A P P E A R A N C E S C O N T I N U E D

2 O N B E H A L F O F T H E D E F E N D A N T :

3 J. BENJAMIN ROTTENBORN, ESQUIRE

4 WOODS ROGERS

5 10 South Jefferson Street

6 Suite 1400

7 Roanoke, Virginia 24038

8 (540) 983-7707

9

10 DAVID E. MURPHY, ESQUIRE

11 CHARLSON, BREDEHOFT, COHEN & BROWN

12 11260 Roger Bacon Drive

13 Suite 201

14 Reston, Virginia 20190

15 (703) 318-6800

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1 abuse.

2 Officers Saenz and Hadden came to the
3 scene. They found no injury upon Ms. Heard and no
4 disruption to the penthouses. **Ms. Heard and her**
5 **friends then fabricated photos that she used to**
6 **obtain an ex parte TRO and a seven million dollar**
7 **divorce settlement which Ms. Heard falsely**
8 **testified in London she gave to the ACLU and, more**
9 **scandalously, to the Children's Hospital of Los**
10 **Angeles; sick children with cancer.**

11 Ms. Heard's counsel has repeatedly used
12 these phony photographs at deposition. For
13 example, at the depositions of Officers Saenz and
14 Hadden who disavowed the photographs, said they
15 did not depict what they saw Ms. Bredehoft has
16 used them to -- in a -- in a brazen attempt to --
17 to show that their disinterested, credible
18 testimony was not true.

19 Another example of Ms. Heard's using
20 these photos and bogus screenshots was Exhibit 2
21 to her motion to transfer venue which was her very
22 first appearance in this court where she attached

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CERTIFICATE OF SHORTHAND REPORTER

I, CAROL A. LOWE, the court reporter before whom the foregoing hearing was taken, do hereby certify that the foregoing transcript is a true and correct record of the proceedings; that said proceedings were taken by me stenographically and thereafter reduced to typewriting under my supervision; and that I am neither counsel for, related to, nor employed by any of the parties to this case and have no interest, financial or otherwise, in its outcome.



Carol A. Lowe, RPR

VIRGINIA:

IN THE CIRCUIT COURT OF FAIRFAX COUNTY, VIRGINIA

JOHN C. DEPP, II

Plaintiff,

v.

AMBER LAURA HEARD,

Defendant.

Civil Action No.: CL-2019-0002911

**PLAINTIFF JOHN C. DEPP, II'S RESPONSES AND OBJECTIONS TO DEFENDANT
AMBER LAURA HEARD'S FIRST SET OF INTERROGATORIES**

Pursuant to Rule 4:8 of the Rules of the Supreme Court of Virginia, Plaintiff John C. Depp, II, by and through his undersigned counsel, hereby responds and objects to Defendant Amber Laura Heard's First Set of Interrogatories (each, an "Interrogatory" and collectively, the "Interrogatory"), dated October 7, 2019 and served in the above captioned action ("Action") as follows:

GENERAL OBJECTIONS

1. Plaintiff incorporates by reference as if fully set forth herein the General Objections contained in the Responses and Objections to Defendant's First Set of Requests for Production of Documents and Things to Plaintiff, dated September 3, 2019.

OBJECTIONS TO INSTRUCTIONS AND DEFINITIONS

Instructions

1. In accordance with the Rules of this Court, You shall answer the following Interrogatories separately and fully, in writing, under oath.

objects to this Interrogatory as calling for information that is neither relevant nor proportional to this case. Not every entity in which Mr. Depp holds an interest is relevant to this case.

Subject to and without waiving the foregoing objections, Plaintiff identifies the following: A Contrario, Brave Pictures, Inc., Contre Courant, The Depp Irrevocable Trust, HST Archives, LLC, Scaramanga Bros., Inc., L.R.D. Productions, Inc., Infinitum Nihil, Inc., Infinitum Nihil Publishing, LLC, Infinitum Nihil Records, LLC, Infinitum Nihil Media, LLC, Infinitum Nihil Music, LLC, JDM Ventures, LLC, John C. Depp II Insurance Trust, John C. Depp II Living Trust, L.R.D. Productions, Inc., Le Hameau du Bebe, LLC, Stratton Films, Inc., The Mooh Investment Trust, P Music Group, LLC, Versailles Road Trust, Sweetzer Trust, LLC, SCI La Pierre, Stratton Films, Inc., and Vajoliroja, LLC.

8. Identify and describe any and all electronic systems You and/or any entities listed in Your answer to Interrogatory No. 7 use to effect, track, monitor, or create records of incoming and outgoing payments, including without limitation any system maintained with or having any relation to City National Bank. Further identify and describe any and all outgoing and incoming payments, from 2010 to the present, to or from the individuals listed in Defendant's Request for Production No. 16 made using each such system, including the amount and purpose of each such payment.

ANSWER:

In addition to the foregoing General Objections and Objections to Definitions and Instructions, Plaintiff objects to this Interrogatory as overly broad and unduly burdensome, and to the extent that it seeks the information protected by the attorney-client privilege, the work product doctrine, or any other applicable privilege, immunity, or protection. Plaintiff further objects to this Interrogatory as calling for information that is neither relevant nor proportional to this case.

In light of the foregoing objections, Plaintiff will not be responding to this Interrogatory.

9. Identify each mental and/or physical health care provider (including drug and/or alcohol addiction/dependency care or treatment providers, counselors or therapists) that You saw or consulted or who examined You or provided treatment or services to You from

January 1, 2010 to the present and state the reason and duration You saw or consulted or received treatment or services from each identified provider. The answer to this Interrogatory should include visits to emergency rooms; any addiction, drug or alcohol treatment or therapy session(s); and visits with or physical or mental health treatment from any doctor, surgeon, psychiatrist, nurse, psychologist, therapist, counselor, medical advisor, specialist, or other provider.

ANSWER:

In addition to the foregoing General Objections and Objections to Definitions and Instructions, Plaintiff objects to this Interrogatory as overly broad and unduly burdensome, and to the extent that it seeks the information protected by the attorney-client privilege, the work product doctrine, or any other applicable privilege, immunity, or protection. Plaintiff further objects to this Interrogatory as calling for information that is neither relevant nor proportional to this case. Not all of Mr. Depp's medical treatment is relevant to this Action. Plaintiff further objects to this Interrogatory to the extent it calls for confidential, personal business, financial, medical, or other proprietary information protected by law, including information that may be protected by the physician-patient privilege and/or the Privacy Rule of the Health Insurance Portability and Accountability Act of 1996 ("HIPAA"). Plaintiff further objects on the grounds that this Interrogatory calls for a medical and/or legal conclusion. Plaintiff further objects to this Interrogatory to the extent it is intended to harass Plaintiff, and constitutes an invasion of privacy. Plaintiff further objects to this Interrogatory because it seeks information more readily obtained by other means, including by way to deposition testimony and/or document discovery.

Subject to and without waiving the foregoing objections, Plaintiff will identify non-privileged documents responsive to this Interrogatory, if any, by Bates number following document production, in accordance with Rule 4.8(f).

10. For each prescription drug You have been prescribed to take since 2010 or that you currently take: (a) identify the physician and/or health care provider who wrote the prescription; (b) state the name of the drug and the dosage to be taken; and (c) identify

each pharmacist who filled the prescription and such pharmacist's pharmacy and/or place of employment.

ANSWER:

In addition to the foregoing General Objections and Objections to Definitions and Instructions, Plaintiff objects to this Interrogatory as overly broad and unduly burdensome, and to the extent that it seeks the information protected by the attorney-client privilege, the work product doctrine, or any other applicable privilege, immunity, or protection. Plaintiff further objects to this Interrogatory as calling for information that is neither relevant nor proportional to this case. Not all of Mr. Depp's medical treatment is relevant to this Action. Plaintiff further objects to this Interrogatory to the extent it calls for confidential, personal business, financial, medical, or other proprietary information protected by law, including information that may be protected by the physician-patient privilege and/or the Privacy Rule of the Health Insurance Portability and Accountability Act of 1996 ("HIPAA"). Plaintiff further objects on the grounds that this Interrogatory calls for a medical and/or legal conclusion. Plaintiff further objects to this Interrogatory to the extent it is intended to harass Plaintiff, and constitutes an invasion of privacy. Plaintiff further objects to this Interrogatory because it seeks information more readily obtained by other means, including by way to deposition testimony and/or document discovery.

Subject to and without waiving the foregoing objections, Plaintiff will identify non-privileged documents responsive to this Interrogatory, if any, by Bates number following document production, in accordance with Rule 4.8(f).

11. For each instance of physical violence or abuse alleged in Ms. Heard's Declaration, state whether You were under the influence of or had consumed any alcohol, medication, or drugs on the days of each such incident, and, if so, state as to each substance consumed (including alcohol) the identity of the substance consumed, the amount of the substance consumed, the date and time each such substance was consumed, the name and address of the place(s) where the substance was consumed, the location and person from which the substance was acquired or obtained, any witnesses present at the time of consumption, and the effect of the substance on You.

ANSWER:

In addition to the foregoing General Objections and Objections to Definitions and Instructions, Plaintiff objects to this Interrogatory as overly broad and unduly burdensome, and to the extent that it seeks the information protected by the attorney-client privilege, the work product doctrine, or any other applicable privilege, immunity, or protection. Plaintiff further objects to this Interrogatory as calling for information that is neither relevant nor proportional to this case. Plaintiff further objects to this Interrogatory because it assumes facts not in evidence, and assumes the truth of Ms. Heard's Declaration. Mr. Depp disputes the allegations of Ms. Heard's allegations. Plaintiff further objects to this Interrogatory because it seeks information more readily obtained by other means, including by way to deposition testimony and/or document discovery. Plaintiff further objects to this Interrogatory to the extent it is intended to harass Plaintiff, and constitutes an invasion of privacy. Plaintiff further objects to this Interrogatory because it calls for a legal conclusion. Plaintiff further objects to this Interrogatory because it is compound.

In light of the foregoing objections, Plaintiff will not respond Interrogatory because he denies all allegations of physical violence and abuse in Ms. Heard's declaration.

12. Identify each Romantic Partner, other than Ms. Heard, that You have had in the past 10 years.

ANSWER:

In addition to the foregoing General Objections and Objections to Definitions and Instructions, Plaintiff objects to this Interrogatory as overly broad and unduly burdensome, and to the extent that it seeks the information protected by the attorney-client privilege, the work product doctrine, or any other applicable privilege, immunity, or protection. Plaintiff further objects to this Interrogatory as calling for information that is neither relevant nor proportional to

this case. Plaintiff further objects to this Interrogatory because it seeks information more readily obtained by other means, including by way to deposition testimony and/or document discovery. Plaintiff further objects to this Interrogatory to the extent it is intended to harass Plaintiff, and constitutes an invasion of privacy. Plaintiff further objects to this Interrogatory as calling for information that is neither relevant nor proportional to this case.

Subject to and without waiving the foregoing objections, none of Mr. Depp's prior Romantic Partners have ever alleged any acts of physical violence or abuse by Mr. Depp other than Ms. Heard. Notwithstanding the foregoing, Mr. Depp has had romantic relationships in the past ten years with Vanessa Paradis and Polina Glen.

13. Describe in detail any separation agreements, settlements, releases, tolling agreements, confidentiality and/or non-disclosure agreements, forbearance agreements, Mary Carter agreements, or any other agreements of any kind which You have negotiated with any Romantic Partner. Your answer should include any such agreements that have been negotiated in order to gain the assistance or compliance of another person and/or entity with regard to this or any other matter.

ANSWER:

In addition to the foregoing General Objections and Objections to Definitions and Instructions, Plaintiff objects to this Interrogatory as overly broad and unduly burdensome, and to the extent that it seeks the information protected by the attorney-client privilege, the work product doctrine, or any other applicable privilege, immunity, or protection. Plaintiff further objects to this Interrogatory as calling for information that is neither relevant nor proportional to this case. Plaintiff further objects to this Interrogatory because it seeks information more readily obtained by other means, including by way to deposition testimony and/or document discovery. Plaintiff further objects to this Interrogatory to the extent it is intended to harass Plaintiff, and constitutes an invasion of privacy. Plaintiff further objects to this Interrogatory as calling for information that is neither relevant nor proportional to this case.

Subject to and without waiving the foregoing objections, Plaintiff identifies the divorce settlement with Ms. Heard. As Ms. Heard is a party to that agreement, Mr. Depp will not further describe that agreement. Plaintiff also identifies the Settlement Agreement with Ms. Vanessa Paradis with respect to the parentage, custody and support of their two minor children, Lily-Rose Depp and Jack Depp. No agreements with any Romantic Partners have ever been negotiated in order to gain the assistance or compliance of another person and/or entity with regard to this matter.

14. Identify and describe facts relating to each instance where any person, other than Ms. Heard, alleged (publicly or privately) that You engaged in any act of physical violence, abuse, or destruction of property at any point in the past 15 years, including (i) the identity of the person(s) that accused You of such conduct; (ii) the person and/or property toward which Your alleged conduct was directed; (iii) whether You were, or were alleged to have been, under the influence of alcohol, medication or illegal drugs at the time of Your alleged conduct; (iv) the date, time and location(s) of each such instance; and (v) the identity of all persons present at the time of the alleged incident.

ANSWER:

In addition to the foregoing General Objections and Objections to Definitions and Instructions, Plaintiff objects to this Interrogatory as overly broad and unduly burdensome, and to the extent that it seeks the information protected by the attorney-client privilege, the work product doctrine, or any other applicable privilege, immunity, or protection. Plaintiff further objects to this Interrogatory as calling for information that is neither relevant nor proportional to this case. Plaintiff further objects to this Interrogatory because it assumes facts not in evidence, and characterizes Plaintiff as engaging in acts of violence. Plaintiff denies any allegation that he engaged in an act of violence. Plaintiff further objects to this Interrogatory because it seeks information more readily obtained by other means, including by way to deposition testimony and/or document discovery. Plaintiff further objects to this Interrogatory to the extent it is intended to harass Plaintiff, and constitutes an invasion of privacy.

Subject to and without waiving the foregoing objections, Plaintiff vehemently denies all of Ms. Heard's allegations of physical violence, abuse, and destruction of property. Plaintiff also denies Gregg "Rocky" Brooks' allegations of physical violence. Specifically, on the evening of April 12, 2017, Mr. Brooks was working as a location manager on the set of a film that has not yet been released, entitled "City of Lies." Mr. Brooks was involved in a series of altercations with persons on set, including a security guard for a nearby property whom Mr. Brooks flipped off; and a woman who was present on set, with whom Mr. Brooks became verbally abusive. Mr. Depp, who was also present on set, eventually intervened and verbally reprimanded Mr. Brooks for his misbehavior. Mr. Brooks claims that during this exchange, Mr. Depp punched him twice. That is categorically false. Mr. Depp, along with multiple eyewitnesses, including Ms. Emma Danoff, Mr. Sean Bett and Mr. Brad Furman who were standing close by and had an unimpeded view of the exchange, have either testified in deposition and/or will testify at trial that Mr. Depp never even touched (and certainly did not punch) Mr. Brooks. Plaintiff reserves his right to supplement his answer to this Interrogatory by identifying non-privileged documents responsive to this Interrogatory, if any, by Bates number following document production, in accordance with Rule 4.8(f).

15. Provide the name, address, profession, and qualifications of each expert witness who You intend to call to testify at the trial of this case, including any rebuttal experts and/or experts to address any alleged new matters raised in Defendant's designation of experts. For each such expert, state the subject matter in which the expert is expected to testify; the substance of the facts as to which the expert is expected to testify; the substance of the opinions which the expert is expected to give; a summary of the grounds for each such opinion; the terms of the expert's compensation, and attach to Your answers any available list of publications written by the expert and any written report made by the expert concerning the expert's findings and opinions in this matter.

ANSWER:

In addition to the foregoing General Objections and Objections to Definitions and Instructions, Plaintiff objects to this Interrogatory as premature given the early stage of discovery.

In light of the foregoing objections, Plaintiff will respond to this Interrogatory in accordance with his obligations under a Stipulation and Order Governing Expert Discovery in this Action and according to a schedule to be agreed upon by the parties or entered by the Court.

16. State in detail all facts which support and/or otherwise relate to any claim for monetary relief as part of this matter. Include in Your answer: (i) an itemization of all damages, loss or injury for which You are claiming or seeking to recover in this action—including each and every employment opportunity which You claim You have lost as a result of the actions complained of; (ii) an explanation of how the damages were computed; (iii) all assumptions made in computing the damages, and the basis for such assumptions; (iv) an explanation of how the damages are attributable to Defendant; and (v) all efforts to mitigate the damages.

ANSWER:

In addition to the foregoing General Objections and Objections to Definitions and Instructions, Plaintiff objects to this Interrogatory as overly broad and unduly burdensome, and to the extent that it seeks the information protected by the attorney-client privilege, the work product doctrine, or any other applicable privilege, immunity, or protection. Plaintiff further objects to this Interrogatory because it seeks information more readily obtained by other means, including by way to deposition testimony and/or document discovery. Plaintiff further objects to this Interrogatory because it would be more appropriately addressed by other means including expert discovery.

In light of the foregoing objections, Plaintiff will not be responding to this Interrogatory at this time, and reserves his right to supplement this response to the extent necessary following the completion of fact and expert discovery.

17. Identify each judicial or administrative proceeding (including all details needed to locate the docket) in which You have had any involvement (including as a party, witness, or

nonparty) from January 1, 2010 to the present, and include a description of (i) the nature of each proceeding; (ii) the court in which the proceeding was/is maintained; (iii) Your involvement in the proceeding, (iv) the status of the proceeding; and (v) the result, if the proceeding has concluded.

ANSWER:

In addition to the foregoing General Objections and Objections to Definitions and Instructions, Plaintiff objects to this Interrogatory as overly broad and unduly burdensome, and to the extent that it seeks the information protected by the attorney-client privilege, the work product doctrine, or any other applicable privilege, immunity, or protection. Plaintiff further objects to this Interrogatory as calling for information that is neither relevant nor proportional to this case. Plaintiff's other legal proceedings not involving Ms. Heard are not relevant to this Action. Plaintiff further objects to this Interrogatory because it seeks information more readily obtained by other means, including by way to deposition testimony and/or document discovery. Plaintiff further objects to this Interrogatory to the extent it is intended to harass Plaintiff, and constitutes an invasion of privacy.

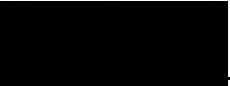
Subject to and without waiving the foregoing objections, Plaintiff identifies the divorce proceedings with Ms. Heard. Because Ms. Heard was a party to those proceedings, Mr. Depp will not describe them further. Plaintiff further identifies:

Judicial/Administrative Proceeding	Nature of Proceeding	The Court in Which the Proceeding Was/Is Maintained	Plaintiff's Involvement	Status/Result
John C. Depp, II, et al. v. The Mandel Company, Inc. dba The Management Group, et al. (Case No. BC682487)	Civil	LASC	Plaintiff and Cross-Defendant	Resolved
John C. Depp, II, et al. v. Bloom Hergott Diemer Rosenthal Laviolette	Civil	LASC	Plaintiff and Cross-Defendant	Ongoing

Feldman Schenkman & Goodman, LLP, et al. (BC680066)				
Gregg "Rocky" Brooks v. John C. Depp, et al. (Case No. BC713123)	Civil	LASC	Defendant	Trial set for May 11, 2020
Jane Doe v. John Christopher Depp, et al. (Case No. BC482823)	Civil	LASC	Defendant	Court-Ordered Dismissal
Eugene Arreola, et al. v. John C. Depp, II, et al. (BC704539)	Civil	LASC	Defendant	Resolved
John Christopher Depp II and News Group Newspapers LTD and Dan Wootton (Claim No. Hq18m01923)	Libel	In The High Court Of Justice Queen's Bench Division Media And Communications List	Claimant	Ongoing
Buckley LLP v. John C. Depp, II, et al. (Case No. 19STCV17470)	Civil	LASC	Defendant	Ongoing
Amber Heard v. John Christopher Depp II (Case No. 9DLP7)	Purported Arbitration Demand	Signature Resolution	Purported Respondent	Denied
In re the Marriage of Amber Laura Depp and John Christopher Depp II (BD641052)	Family	LASC	Respondent	Resolved

Dated: October 28, 2019

Respectfully submitted,


Benjamin G. Chew (VSB #29113)
Elliot J. Weingarten (*pro hac vice*)
Camille M. Vasquez (*pro hac vice*)
Andrew C. Crawford (VSB #89093)
BROWN RUDNICK, LLP
601 Thirteenth Street NW, Suite 600
Washington, DC 20005
Phone: (202) 536-1785
Fax: (617) 289-0717
bchew@brownrudnick.com

- and -

Robert B. Gilmore (*pro hac vice*)
Kevin L. Attridge (*pro hac vice*)
STEIN MITCHELL BEATO & MISSNER LLP
901 15th Street NW, Suite 700
Washington, DC 20005
Phone: (202) 601-1589
Fax: (202) 296-8312
rgilmore@steinmitchell.com

Adam R. Waldman
THE ENDEAVOR GROUP LAW FIRM, P.C.
1775 Pennsylvania Avenue NW, Suite 350
Washington, DC 20006

Counsel for Plaintiff John C. Depp, II

CERTIFICATE OF SERVICE

I hereby certify that on this 28th day of October 2019, I caused copies of the foregoing to be served via email (per written agreement between the Parties) on the following:

Roberta A. Kaplan (*pro hac vice*)
Julie E. Fink (*pro hac vice*)
John C. Quinn (*pro hac vice*)
Joshua Matz (*pro hac vice*)
KAPLAN HECKER & FINK, LLP
350 Fifth Avenue, Suite 7110
New York, New York 10118
Telephone: (212) 763-0883
rkaplan@kaplanhecker.com
jfink@kaplanhecker.com
jquinn@kaplanhecker.com
jmatz@kaplanhecker.com

Eric M. George (*pro hac vice*)
Richard A. Schwartz (*pro hac vice*)
BROWNE GEORGE ROSS LLP
2121 Avenue of the Stars, Suite 2800
Los Angeles, California 90067
Telephone: (310) 274-7100
Facsimile: (310) 275-5697
egeorge@bgrfirm.com
rschwartz@bgrfirm.com

A. 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
brottenborn@woodsrogers.com
jtreece@woodsrogers.com

Counsel for Defendant Amber Laura Heard


Benjamin G. Chew

CERTIFICATION

I hereby certify under penalty of perjury that the contents of the foregoing are true and accurate to the best of my knowledge, information and belief.

Dated: 28 Oct., 2019

Location: _____



t ***You and/or Your.*** The terms “You” and/or “Your” refer to the recipient(s) of these discovery requests, as well as all persons and entities over which said recipient has “control” as understood by the Rules of this Court.

RESPONSE: No objection.

INTERROGATORIES

11. For each instance of physical violence or abuse alleged in Ms. Heard’s Declaration, state whether You were under the influence of or had consumed any alcohol, medication, or drugs on the days of each such incident, and, if so, state as to each substance consumed (including alcohol) the identity of the substance consumed, the amount of the substance consumed, the date and time each such substance was consumed, the name and address of the place(s) where the substance was consumed, the location and person from which the substance was acquired or obtained, any witnesses present at the time of consumption, and the effect of the substance on You.

ANSWER:

In addition to the foregoing General Objections and Objections to Definitions and Instructions, Plaintiff objects to this Interrogatory as overly broad and unduly burdensome, and to the extent that it seeks the information protected by the attorney-client privilege, the work product doctrine, or any other applicable privilege, immunity, or protection. Plaintiff further objects to this Interrogatory as calling for information that is neither relevant nor proportional to this case. Plaintiff further objects to this Interrogatory because it assumes facts not in evidence, and assumes the truth of Ms. Heard’s Declaration. Mr. Depp disputes the allegations of Ms. Heard’s allegations. Plaintiff further objects to this Interrogatory because it seeks information more readily obtained by other means, including by way to deposition testimony and/or document discovery. Plaintiff further objects to this Interrogatory to the extent it is intended to harass Plaintiff, and constitutes an invasion of privacy. Plaintiff further objects to this Interrogatory because it calls for a legal conclusion. Plaintiff further objects to this Interrogatory because it is compound.

In light of the foregoing objections, Plaintiff will not respond Interrogatory because he denies all allegations of physical violence and abuse in Ms. Heard's declaration.

SUPPLEMENTAL ANSWER:

Plaintiff reiterates the objections stated above in its original Answer. Subject to and without waiving any of the foregoing objections, Plaintiff responds that he may have consumed some amount of alcohol, medications or drugs on one or more of the days of alleged incidents. To the extent Plaintiff consumed some amount of alcohol, medications or drugs, Plaintiff does not specifically recall the exact times or types of substances consumed as the incidents alleged by Ms. Heard happened many years ago. Plaintiff also disputes Ms. Heard's allegations, and therefore has no reason to recall the details of the days of the alleged incidents. Whether or not some moderate amount of substance was consumed, Plaintiff denies the binge alleged by Ms. Heard. Plaintiff also responds that he did not and would not have engaged in the conduct alleged by Ms. Heard whether or not such substances were consumed.

14. Identify and describe facts relating to each instance where any person, other than Ms. Heard, alleged (publicly or privately) that You engaged in any act of physical violence, abuse, or destruction of property at any point in the past 15 years, including (i) the identity of the person(s) that accused You of such conduct; (ii) the person and/or property toward which Your alleged conduct was directed; (iii) whether You were, or were alleged to have been, under the influence of alcohol, medication or illegal drugs at the time of Your alleged conduct; (iv) the date, time and location(s) of each such instance; and (v) the identity of all persons present at the time of the alleged incident.

ANSWER:

In addition to the foregoing General Objections and Objections to Definitions and Instructions, Plaintiff objects to this Interrogatory as overly broad and unduly burdensome, and to the extent that it seeks the information protected by the attorney-client privilege, the work product doctrine, or any other applicable privilege, immunity, or protection. Plaintiff further objects to this Interrogatory as calling for information that is neither relevant nor proportional to

this case. Plaintiff further objects to this Interrogatory because it assumes facts not in evidence, and characterizes Plaintiff as engaging in acts of violence. Plaintiff denies any allegation that he engaged in an act of violence. Plaintiff further objects to this Interrogatory because it seeks information more readily obtained by other means, including by way to deposition testimony and/or document discovery. Plaintiff further objects to this Interrogatory to the extent it is intended to harass Plaintiff, and constitutes an invasion of privacy.

Subject to and without waiving the foregoing objections, Plaintiff vehemently denies all of Ms. Heard's allegations of physical violence, abuse, and destruction of property. Plaintiff also denies Gregg "Rocky" Brooks' allegations of physical violence. Specifically, on the evening of April 12, 2017, Mr. Brooks was working as a location manager on the set of a film that has not yet been released, entitled "City of Lies." Mr. Brooks was involved in a series of altercations with persons on set, including a security guard for a nearby property whom Mr. Brooks flipped off; and a woman who was present on set, with whom Mr. Brooks became verbally abusive. Mr. Depp, who was also present on set, eventually intervened and verbally reprimanded Mr. Brooks for his misbehavior. Mr. Brooks claims that during this exchange, Mr. Depp punched him twice. That is categorically false. Mr. Depp, along with multiple eyewitnesses, including Ms. Emma Danoff, Mr. Sean Bett and Mr. Brad Furman who were standing close by and had an unimpeded view of the exchange, have either testified in deposition and/or will testify at trial that Mr. Depp never even touched (and certainly did not punch) Mr. Brooks. Plaintiff reserves his right to supplement his answer to this Interrogatory by identifying non-privileged documents responsive to this Interrogatory, if any, by Bates number following document production, in accordance with Rule 4.8(f).

SUPPLEMENTAL ANSWER:

Plaintiff reiterates the objections stated above in its original Answer. Subject to and without waiving any of the foregoing objections, Plaintiff responds that no other person besides Mr. Brooks has accused Plaintiff (publicly or privately) that Plaintiff engaged in any act of physical violence, abuse, or destruction of property at any point in the past 15 years. The allegations by Mr. Brooks are contained in his Complaint filed in the Los Angeles Superior Court, and equally available to Ms. Heard.

16. State in detail all facts which support and/or otherwise relate to any claim for monetary relief as part of this matter. Include in Your answer: (i) an itemization of all damages, loss or injury for which You are claiming or seeking to recover in this action—including each and every employment opportunity which You claim You have lost as a result of the actions complained of; (ii) an explanation of how the damages were computed; (iii) all assumptions made in computing the damages, and the basis for such assumptions; (iv) an explanation of how the damages are attributable to Defendant; and (v) all efforts to mitigate the damages.

ANSWER:

In addition to the foregoing General Objections and Objections to Definitions and Instructions, Plaintiff objects to this Interrogatory as overly broad and unduly burdensome, and to the extent that it seeks the information protected by the attorney-client privilege, the work product doctrine, or any other applicable privilege, immunity, or protection. Plaintiff further objects to this Interrogatory because it seeks information more readily obtained by other means, including by way to deposition testimony and/or document discovery. Plaintiff further objects to this Interrogatory because it would be more appropriately addressed by other means including expert discovery.

In light of the foregoing objections, Plaintiff will not be responding to this Interrogatory at this time, and reserves his right to supplement this response to the extent necessary following the completion of fact and expert discovery.

SUPPLEMENTAL ANSWER:

Plaintiff reiterates the objections stated above in its original Answer, including that this Interrogatory is more appropriately addressed following the completion of fact and expert discovery. Subject to and without waiving any of the foregoing objections, Plaintiff notes that because Ms. Heard's defamatory statements constitute defamation per se, damages are presumed, and need not be specifically proven. In any event, Plaintiff responds that his claim for monetary damages is supported by, *inter alia*, the fact that Plaintiff's reputation and career has been severely damaged. Although it is obvious and inevitable that these types of allegations would have a negative impact on Plaintiff's reputation and professional standing, particularly because Plaintiff is an individual in the public eye, the economic impact of these defamatory statements will be the subject of expert analysis and disclosure according to Virginia law.

Further, just four days after Ms. Heard's op-ed was first published on December 18, 2018, Disney announced on December 22, 2018 that it was dropping Mr. Depp from his leading role as Captain Jack Sparrow in the forthcoming sixth installment of the *Pirates of the Caribbean* franchise. Based on Mr. Depp's prior earnings in connection with the *Pirates of the Caribbean* franchise, Mr. Depp expects that his role in the sixth installment would have been worth at least \$50,000,000.

Dated: August 14, 2020

Respectfully submitted,

A solid black rectangular box redacting the signature of the attorney.

Benjamin G. Chew (VSB #29113)
Camille M. Vasquez (*pro hac vice*)
Andrew C. Crawford (VSB #89093)
BROWN RUDNICK, LLP

601 Thirteenth Street NW, Suite 600
Washington, DC 20005
Phone: (202) 536-1785
Fax: (617) 289-0717
bchew@brownrudnick.com

- and -

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

Counsel for Plaintiff John C. Depp, II

CERTIFICATE OF SERVICE

I hereby certify that on this 14th day of August 2020, I caused copies of the foregoing to be served via email (per written agreement between the Parties) on the following:

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
brottenborn@woodsrogers.com
jtreece@woodsrogers.com

Elaine Charlson Bredehoft (VSB No. 23766)
Carla D. Brown (VSB No. 44803)
Adam S. Nadelhaft (VSB No. 91717)
David E. Murphy (VSB No. 90938)
CHARLSON BREDEHOFT COHEN & BROWN, P.C.
11260 Roger Bacon Dr., Suite 201
Reston, VA 20190
Phone: 703-318-6800
Fax: 703-318-6808
ebredehoft@cbcblaw.com
cbrown@cbcblaw.com
anahelhaft@cbcblaw.com
dmurphy@cbcblaw.com

Counsel for Defendant Amber Laura Heard



Andrew C. Crawford

VIRGINIA:

IN THE CIRCUIT COURT OF FAIRFAX COUNTY

JOHN C. DEPP, II,

Plaintiff,

v.

AMBER LAURA HEARD,

Defendant.

Civil Action No.: CL-2019-0002911

ORDER

THIS MATTER CAME TO BE HEARD upon Defendant and Counterclaim Plaintiff Amber Laura Heard's ("Ms. Heard") Motion to Compel Responses to Tenth Requests for Production of Documents to Plaintiff and Counterclaim Defendant John C. Depp II, pursuant to Rule 4:12 of the Rules of the Virginia Supreme Court; and upon consideration of the briefs, exhibits, and argument of counsel on August 6, 2021, it is hereby:

ORDERED that Ms. Heard's Motion is **GRANTED** in part and **DENIED** in part; and it is further

ORDERED that Plaintiff John C. Depp, II shall produce all responsive documents to the following revised Request No. 5 of Ms. Heard's Tenth Requests for Production of Documents:

Portions of non-privileged deposition transcripts, written discovery responses (including responses to interrogatories, requests for production, and requests for admission), pleadings, exhibits to pleadings, and deposition exhibits referenced in responsive portions of deposition testimony provided in any of the "Other Litigation" [as defined in the 10th Requests for Production] relating to:

- a. Ms. Heard's relationship with Mr. Depp;
- b. To the extent not covered by the preceding category, Mr. Depp's and Ms. Heard's respective allegations of physical or emotional domestic abuse/violence;

no emv 8/23/21

- c. Any alleged damage to Mr. Depp's career prospects, loss of and injury to reputation, loss of roles or economic opportunities, harm to his ability to carry on his profession, embarrassment, humiliation, emotional distress, loss of income, career interruption or lost career opportunity, as a result of alleged tardiness or behavior on set;
- d. Any allegations of reputational harm, alleged damage to Mr. Depp's career prospects, loss of and injury to reputation, loss of roles or economic opportunities, harm to his ability to carry on his profession, embarrassment, humiliation, emotional distress, loss of income, career interruption or lost career opportunity, caused by the defendants in the Other Litigation;
- e. Any allegations by the defendants in the Other Litigation of damage to Mr. Depp's career prospects, damage to his career prospects, loss of and injury to reputation, loss of roles or economic opportunities, harm to his ability to carry on his profession, embarrassment, humiliation, emotional distress, loss of income, career interruption or lost career opportunity;
- f. Any allegations by anyone of drug and alcohol use or abuse by Mr. Depp or Ms. Heard;
- g. Anything related to Mr. Depp committing property damage, including descriptions of the damage, pictures or other evidence of the damage, cost of repairs, and any other financial remuneration as a result of the property damage committed;
- h. Anything related to Ms. Heard committing property damage, including descriptions of the damage, pictures or other evidence of the damage, cost of repairs, and any other financial enumeration as a result of the property damage committed;
- i. Anything related to Mr. Depp's injury to his finger in March 2015; and
- j. Anything related to Mr. Depp's efforts to obtain a pre-nuptial or post-nuptial agreement from Ms. Heard and any communications in connection therewith.

and it is further

ORDERED that Plaintiff John C. Depp, II shall produce all responsive documents to the following revised Request No. 6 of Ms. Heard's Tenth Requests for Production of Documents:

All financial documents relied upon by Mr. White, or anyone else who may have been involved or participated (collectively, "Mr. White"), in preparing the documents bates numbered EWC 1-52. For purposes of clarity, this request is only seeking all underlying financial documents relied upon or referred to by Mr. White to prepare the numbers and calculations included in EWC 1-52.

and it is further

ORDERED that Plaintiff John C. Depp, II shall produce all responsive documents to the following revised Request No. 20 of Ms. Heard's Tenth Requests for Production of Documents:

Please provide documents sufficient to reflect all loans, benefits, perks, expenses, or payments for any other reason in excess of \$5,000 in either cash or value made by You from May 21, 2016 through the present, to the following (for each person the request includes if paid to an entity or someone on their behalf): Debbie Lloyd, Christi Dembrowski, Trinity Esparza, Brandon Patterson, Cornelius Harrell, Alejandro Romero, Robin Baum, Laura Divenere, Christian Carino, Jack Whigham, Tracy Jacob, Melanie Inglessis, Stephen Deuters, Sean Bett, Malcolm Connolly, Nathan Holmes, Raquel Pennington, Kate James, Jennifer Howell, Michele Mulrooney, Edward White, Melissa Saenz, Tyler Hadden, Isaac Baruch, Lisa Beane, Erin Boerum, Connell Cowan, Bobby de Leon, Gina Deuters, Josh Drew, Ben King, David Kipper, Joel Mandel, Samantha McMillen, Kevin Murphy, Todd Norman, C.J. Roberts, Tara Roberts, Anthony Romero, Trudy Salven, Sam Sarkar, Robin Schulman, Doug Stanhope, Jessica Weitz, Bruce Witkin, Keenan Wyatt, and Blair Berk.

The foregoing shall not require the production of documents reflecting payments to Mr. Depp's attorneys. Mr. Depp shall also identify, in the affirmative and without stating any amounts, whether any of the above identified individuals received any salary, commissions, bonuses, or advances ("Salary") from him.


and it is further

ORDERED that Mr. Depp shall produce all documents responsive to the above Requests no later than September 17, 2021; and it is further

ORDERED that Ms. Heard's Motion to Compel Requests 10, 24 and 25 of the Tenth Requests for Production of Documents is DENIED as overbroad.

SO ORDERED.

August 19, 2021


The Honorable Penney S. Azcarate
Chief Judge, Fairfax County Circuit Court

Compliance with Rule 1:13 requiring the endorsement of counsel of record is modified by the Court, in its discretion, to permit the submission of the following electronic signatures of counsel in lieu of an original endorsement or dispensing with endorsement.

**SEEN AND PARTIALLY OBJECTED TO FOR THE
REASONS STATED IN BRIEFING AND AT ORAL ARGUMENT:**



(by permission)

Elaine Charlson Bredehoff (VSB No. 23766)
Adam S. Nadelhaft (VSB No. 91717)
Clarissa K. Pintado (VSB No. 86882)
David E. Murphy (VSB No. 90938)
Charlson Bredehoff Cohen & Brown, P.C.
11260 Roger Bacon Drive, Suite 201
Reston, Virginia 20190
Telephone: (703) 318-6800
ebredehoff@cbcblaw.com
anadelhaft@cbcblaw.com
cpintado@cbcblaw.com
dmurphy@cbcblaw.com

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
brottenborn@woodsrogers.com
jtreece@woodsrogers.com

Counsel to Defendant/Counterclaim Plaintiff, Amber Laura Heard

**SEEN AND PARTIALLY OBJECTED TO FOR THE
REASONS STATED IN BRIEFING AND AT ORAL ARGUMENT:**



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
bchew@brownrudnick.com
acrawford@brownrudnick.com

Camille M. Vasquez (admitted *pro hac vice*)
BROWN RUDNICK LLP
2211 Michelson Drive
Irvine, CA 92612
Telephone: (949) 752-7100
Facsimile: (949) 252-1514
cvasquez@brownrudnick.com

Counsel for Plaintiff/Counterclaim Defendant, John C. Depp, II

scope, and vague and ambiguous in its use of the terms “direct contact” and “sexual manner.” Plaintiff further objects to this term to the extent that it is inflammatory and harassing, assumes facts not in evidence, lacks foundation, calls for a medical and/or legal conclusion and seeks information unrelated to this case and that is unlikely to lead to the discovery of admissible evidence. Plaintiff will agree to meet and confer with Defendant regarding this term.

s ***You and/or Your.*** The terms “You” and/or “Your” refer to the recipient(s) of these discovery requests, as well as all persons and entities over which said recipient has “control” as understood by the Rules of this Court.

RESPONSE: No objection.

INTERROGATORIES

1. Identify any payments, gifts, or transfers of value of any kind, whether in monetary form or otherwise, made by You (and/or any entity or person affiliated or associated with You or acting on Your behalf) or concerning or for the benefit of You (and/or any entity or person affiliated or associated with You or acting on Your behalf), from 2012 to present to Winona Ryder, Jennifer Grey, Lori Allison, Sherilynn Fenn, Holly Robinson, Traci Lords, Juliette Lewis, Tatjana Patitz, Ellen Barkin, Kate Moss, Naomi Campbell, Vanessa Paradis, Christina Ricci, Keira Knightly, Marion Cotillard, Angelina Jolie, Eva Green, Ashley Oslen, Ruth Wilson, Robin Baum, Polina Glen, or any other Romantic Partners.

ANSWER:

In addition to the foregoing General Objections and Objections to Definitions and Instructions, Plaintiff objects to this Interrogatory as overly broad and unduly burdensome to the extent it asks Plaintiff to identify any “transfer” of any kind to any of 21 identified individuals plus an indefinite number of “romantic partners.” Plaintiff further objects to this Interrogatory to the extent it seeks documents and communications regarding “any” “romantic partners.” Plaintiff further objects to this Interrogatory as unlikely to lead to the discovery of admissible evidence and that it seeks documents and communications that are irrelevant, immaterial, or unnecessary to the issues in this Action. Plaintiff further objects to this Interrogatory to the extent it is intended to harass Plaintiff, and constitutes an invasion of privacy. Plaintiff further objects to this Interrogatory as unreasonably cumulative and duplicative of Defendant’s document requests,

specifically Request No. 2 in Defendant's Third Request for Production of Documents, and for which Plaintiff has agreed to produce responsive documents.

In light of the foregoing objections, Plaintiff will not respond to this Interrogatory.

2. State Your fees from every Performance from 2010 to the present.

ANSWER:

In addition to the foregoing General Objections and Objections to Definitions and Instructions, Plaintiff objects to this Interrogatory as overly broad and unduly burdensome, and to the extent that it seeks the information protected by the attorney-client privilege, the work product doctrine, or any other applicable privilege, immunity, or protection. Plaintiff further objects to this Interrogatory as unlikely to lead to the discovery of admissible evidence and that it seeks documents and communications that are irrelevant, immaterial, or unnecessary to the issues in this Action. Plaintiff further objects to this Interrogatory as unreasonably cumulative and duplicative of Defendant's document requests, specifically Request No. 3 in Defendant's Third Request for Production of Documents, and for which Plaintiff has agreed to produce responsive documents.

In light of the foregoing objections, Plaintiff will not respond to this Interrogatory.

3. If you denied or objected to any of Defendant's First Set of Requests for Admission, state the basis of bases or reasons for your denials or objections.

ANSWER:

In addition to the foregoing General Objections and Objections to Definitions and Instructions, Plaintiff objects to this Interrogatory as overly broad and unduly burdensome, and to the extent that it seeks the production of documents or communications protected by the attorney-client privilege, the work product doctrine, or any other applicable privilege, immunity, or protection. Plaintiff further objects to this Interrogatory as unlikely to lead to the discovery of

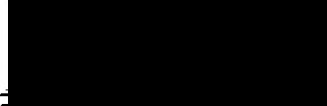
admissible evidence and that it seeks documents and communications that are irrelevant, immaterial, or unnecessary to the issues in this Action. Plaintiff further objects to this Interrogatory to the extent it is intended to harass Plaintiff, and constitutes an invasion of privacy

Subject to and without waiving the foregoing objections, Plaintiff responds as follows:

Request for Admission	Basis for Denial
#1-4, 6	Plaintiff denies engaging in the conduct described in these Requests for Admission
#5	Due to the undefined and vague term "headbutted," Plaintiff is unable to respond to this Request as written. To the extent Plaintiff is asked to formulate his own definition of "headbutted," Plaintiff denies engaging in the conduct.
#7-10	Due to the undefined and vague terms, Plaintiff is unable to respond to these Requests. To the extent Plaintiff is asked to formulate his own definitions of these terms, Plaintiff denies engaging in the conduct.
#11-15	Plaintiff objects to these Requests as irrelevant and immaterial to this Action and unlikely to lead to the discovery of admissible evidence.

Dated: December 20, 2019

Respectfully submitted,



Benjamin G. Chew (VSB #29113)
Elliot J. Weingarten (*pro hac vice*)
Camille M. Vasquez (*pro hac vice*)
Andrew C. Crawford (VSB #89093)
BROWN RUDNICK, LLP

601 Thirteenth Street NW, Suite 600
Washington, DC 20005
Phone: (202) 536-1785
Fax: (617) 289-0717
bchew@brownrudnick.com

- and -

Robert B. Gilmore (*pro hac vice*)
Kevin L. Attridge (*pro hac vice*)
STEIN MITCHELL BEATO & MISSNER LLP
901 15th Street NW, Suite 700
Washington, DC 20005
Phone: (202) 601-1589
Fax: (202) 296-8312
rgilmore@steinmitchell.com

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

Counsel for Plaintiff John C. Depp, II

CERTIFICATE OF SERVICE

I hereby certify that on this 20th day of December 2019, I caused copies of the foregoing to be served via email (per written agreement between the Parties) on the following:


Róberta A. Kaplan (*pro hac vice*)
Julie E. Fink (*pro hac vice*)
John C. Quinn (*pro hac vice*)
KAPLAN HECKER & FINK, LLP
350 Fifth Avenue; Suite 7110
New York, New York 10118
Telephone: (212) 763-0883
rkaplan@kaplanhecker.com
jfink@kaplanhecker.com
jqinn@kaplanhecker.com

Davida Brook (*pro hac vice*)
SUSMAN GODFREY LLP
1900 Avenue of the Stars
Suite 1400
Los Angeles, California
Telephone: (310) 789-3105
dbrooke@susmangodfrey.com

A. 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
brottenborn@woodsrogers.com
jtreece@woodsrogers.com

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
Telephone: (703) 273-8898
Facsimile: (703) 273-8897
tmcevoy@cameronmcevoy.com
sroche@cameronmcevoy.com

Counsel for Defendant Amber Laura Heard

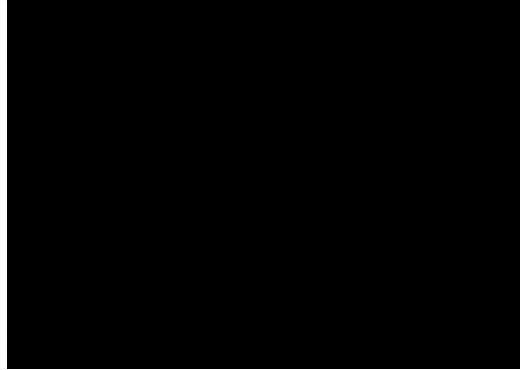

Benjamin G. Chew

CERTIFICATION

I hereby certify under penalty of perjury that the contents of the foregoing are true and accurate to the best of my knowledge, information and belief.

Dated: December 20, 2019

Location: Los Angeles, CA



scope, and vague and ambiguous in its use of the terms “direct contact” and “sexual manner.” Plaintiff further objects to this term to the extent that it is inflammatory and harassing, assumes facts not in evidence, lacks foundation, calls for a medical and/or legal conclusion and seeks information unrelated to this case and that is unlikely to lead to the discovery of admissible evidence. Plaintiff will agree to meet and confer with Defendant regarding this term.

s *You and/or Your.* The terms “You” and/or “Your” refer to the recipient(s) of these discovery requests, as well as all persons and entities over which said recipient has “control” as understood by the Rules of this Court.

RESPONSE: No objection.

INTERROGATORIES

1. Identify any payments, gifts, or transfers of value of any kind, whether in monetary form or otherwise, made by You (and/or any entity or person affiliated or associated with You or acting on Your behalf) or concerning or for the benefit of You (and/or any entity or person affiliated or associated with You or acting on Your behalf), from 2012 to present to Winona Ryder, Jennifer Grey, Lori Allison, Sherilynn Fenn, Holly Robinson, Traci Lords, Juliette Lewis, Tatjana Patitz, Ellen Barkin, Kate Moss, Naomi Campbell, Vanessa Paradis, Christina Ricci, Keira Knightly, Marion Cotillard, Angelina Jolie, Eva Green, Ashley Oslen, Ruth Wilson, Robin Baum, Polina Glen, or any other Romantic Partners.

ANSWER:

In addition to the foregoing General Objections and Objections to Definitions and Instructions, Plaintiff objects to this Interrogatory as overly broad and unduly burdensome to the extent it asks Plaintiff to identify any “transfer” of any kind to any of 21 identified individuals plus an indefinite number of “romantic partners.” Plaintiff further objects to this Interrogatory to the extent it seeks documents and communications regarding “any” “romantic partners.” Plaintiff further objects to this Interrogatory as unlikely to lead to the discovery of admissible evidence and that it seeks documents and communications that are irrelevant, immaterial, or unnecessary to the issues in this Action. Plaintiff further objects to this Interrogatory to the extent it is intended to harass Plaintiff, and constitutes an invasion of privacy. Plaintiff further objects to this Interrogatory as unreasonably cumulative and duplicative of Defendant’s document requests,

specifically Request No. 2 in Defendant's Third Request for Production of Documents, and for which Plaintiff has agreed to produce responsive documents.

In light of the foregoing objections, Plaintiff will not respond to this Interrogatory.

SUPPLEMENTAL ANSWER:

Plaintiff reiterates the objections stated above in its original Answer. Subject to and without waiving any of the foregoing objections, Plaintiff responds as follows: Plaintiff has no independent recollection or records of any payments, gifts, or transfers of value of any kind, whether in monetary form or otherwise, made to: Winona Ryder, Jennifer Grey, Lori Allison, Sherilynn Fenn, Holly Robinson, Traci Lords, Juliette Lewis, Tatjana Patitz, Ellen Barkin, Kate Moss, Naomi Campbell, Christina Ricci, Keira Knightly, Marion Cotillard, Angelina Jolie, Eva Green, Ashley Oslen or Ruth Wilson. Plaintiff will identify non-privileged documents responsive to this Interrogatory relating to any payments, gifts, or transfers of value of any kind made to Vanessa Paradis, Polina Glen and Robin Baum, if any, by Bates number following document production, in accordance with Rule 4.8(f).

2. State Your fees from every Performance from 2010 to the present.

ANSWER:

In addition to the foregoing General Objections and Objections to Definitions and Instructions, Plaintiff objects to this Interrogatory as overly broad and unduly burdensome, and to the extent that it seeks the information protected by the attorney-client privilege, the work product doctrine, or any other applicable privilege, immunity, or protection. Plaintiff further objects to this Interrogatory as unlikely to lead to the discovery of admissible evidence and that it seeks documents and communications that are irrelevant, immaterial, or unnecessary to the issues in this Action. Plaintiff further objects to this Interrogatory as unreasonably cumulative and duplicative of Defendant's document requests, specifically Request No. 3 in Defendant's

Third Request for Production of Documents, and for which Plaintiff has agreed to produce responsive documents.


In light of the foregoing objections, Plaintiff will not respond to this Interrogatory.

SUPPLEMENTAL ANSWER:

Plaintiff reiterates the objections stated above in its original Answer. Subject to and without waiving any of the foregoing objections, Plaintiff responds as follows: Plaintiff will identify non-privileged documents responsive to this Interrogatory relating to his fees from every Performance for 2010 to the present, by Bates number following document production, in accordance with Rule 4.8(f).

Dated: August 21, 2020

Respectfully submitted,


Benjamin G. Chew (VSB #29113)
Camille M. Vasquez (*pro hac vice*)
Andrew C. Crawford (VSB #89093)
BROWN RUDNICK, LLP
601 Thirteenth Street NW, Suite 600
Washington, DC 20005
Phone: (202) 536-1785
Fax: (617) 289-0717
bchew@brownrudnick.com

- and -

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

Counsel for Plaintiff John C. Depp, II

CERTIFICATE OF SERVICE

I hereby certify that on this 21st day of August 2020, I caused copies of the foregoing to be served via email (per written agreement between the Parties) on the following:

A. 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
brottenborn@woodsrogers.com
jtreece@woodsrogers.com

Elaine Charlson Bredehoft (VSB No. 23766)
Carla D. Brown (VSB No. 44803)
Adam S. Nadelhaft (VSB No. 91717)
David E. Murphy (VSB No. 90938)
CHARLSON BREDEHOFT COHEN &
BROWN, P.C.
11260 Roger Bacon Dr., Suite 201
Reston, VA 20190
Phone: 703-318-6800
Fax: 703-318-6808
ebredehoft@cbcblaw.com
cbrown@cbcblaw.com
anahelhaft@cbcblaw.com
dmurphy@cbcblaw.com

Counsel for Defendant Amber Laura Heard

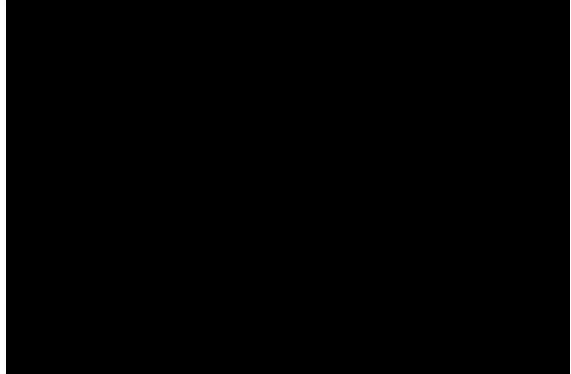


Andrew C. Crawford

CERTIFICATION

I hereby certify under penalty of perjury that the contents of the foregoing are true and accurate to the best of my knowledge, information and belief.

Dated: August 21, 2020



q ***Plaintiff and/or Mr. Depp.*** The terms “Plaintiff” and/or “Mr. Depp” refer to Plaintiff John C. Depp, II, including his agents, representatives, employees, assigns, and all persons acting on his behalf.

RESPONSE: Plaintiff objects to this definition as overly broad and unduly burdensome, to the extent that it is inclusive of “agents, representatives, employees, assigns, and all persons acting on his behalf.” Plaintiff will interpret this term to exclude all privileged communications and documents.

r ***Romantic Partners.*** The term “Romantic Partners” shall mean any persons you have touched in a sexual manner in the past ten (10) years, meaning: (a) direct contact between any part of your body and another person’s genitalia, anus, groin, breast, inner thigh, or buttocks; or (b) direct contact between any part of a third party’s body and your genitalia, anus, groin, breast, inner thigh, or buttocks.

RESPONSE: Plaintiff objects to this definition as overly broad and unduly burdensome, vague and ambiguous to the extent it seeks to impose burdens beyond those required by the Rules. This term is overly broad in its ten year scope, and vague and ambiguous in its use of the terms “direct contact” and “sexual manner.” Plaintiff further objects to this term to the extent that it is inflammatory and harassing, assumes facts not in evidence, lacks foundation, calls for a medical and/or legal conclusion and seeks information unrelated to this case and that is unlikely to lead to the discovery of admissible evidence. Plaintiff will agree to meet and confer with Defendant regarding this term.

s ***You and/or Your.*** The terms “You” and/or “Your” refer to the recipient(s) of these discovery requests, as well as all persons and entities over which said recipient has “control” as understood by the Rules of this Court.

RESPONSE: No objection.

REQUESTS FOR ADMISSION

1. Admit that You slapped Amber Heard.

ANSWER:

Plaintiff denies this Request.

2. Admit that You punched Amber Heard.

ANSWER:

Plaintiff denies this Request.

3. Admit that You slapped or punched Amber Heard while wearing rings on your hand.

ANSWER:

Plaintiff denies this Request.

4. Admit that You choked Amber Heard.

ANSWER:

Plaintiff denies this Request.

5. Admit that You headbutted Amber Heard.

ANSWER:

In addition to the foregoing General Objections and Objections to Definitions and Instructions, Plaintiff objects to this Request as vague and ambiguous because “headbutted” is not a defined term. Plaintiff will interpret these terms in accordance with its ordinary English language usage.

Subject to and without waiving the foregoing objection, Plaintiff denies this Request.

6. Admit that You kicked Amber Heard.

ANSWER:

Plaintiff denies this Request.

7. Admit that You pushed or shoved Amber Heard.

ANSWER:

In addition to the foregoing General Objections and Objections to Definitions and Instructions, Plaintiff objects to this Request as vague and ambiguous because “pushed” and

“shoved” are not defined terms. Plaintiff will interpret these terms in accordance with its ordinary English language usage.

Subject to and without waiving the foregoing objections, Plaintiff denies this Request.

8. Admit that You threw a glass bottle or bottles at Amber Heard.

ANSWER:

In addition to the foregoing General Objections and Objections to Definitions and Instructions, Plaintiff objects to this Request to the extent it is intended to harass Plaintiff, and constitutes an invasion of privacy. Plaintiff objects to this Request as vague and ambiguous because “threw” is not a defined term. Plaintiff will interpret this term in accordance with its ordinary English language usage.

Subject to and without waiving the foregoing objections, Plaintiff denies this Request.

9. Admit that You threw a cell phone or cell phones at Amber Heard.

ANSWER:

In addition to the foregoing General Objections and Objections to Definitions and Instructions, Plaintiff objects to this Request to the extent it is intended to harass Plaintiff, and constitutes an invasion of privacy. Plaintiff objects to this Request as vague and ambiguous because “threw” is not a defined term. Plaintiff will interpret this term in accordance with its ordinary English language usage.

Subject to and without waiving the foregoing objections, Plaintiff denies this Request.

10. Admit that You threw any other object or objects at Amber Heard.

ANSWER:

In addition to the foregoing General Objections and Objections to Definitions and Instructions, Plaintiff objects to this Request to the extent it is intended to harass Plaintiff, and constitutes an invasion of privacy. Plaintiff objects to this Request as vague and ambiguous

because “threw” is not a defined term. Plaintiff will interpret this term in accordance with its ordinary English language usage.

Subject to and without waiving the foregoing objections, Plaintiff denies this Request.

11. Admit that You destroyed or damaged property in the presence of Amber Heard.

ANSWER:

In addition to the foregoing General Objections and Objections to Definitions and Instructions, Plaintiff objects to this Request to the extent it is intended to harass Plaintiff, and constitutes an invasion of privacy. Plaintiff further objects to this Request as unlikely to lead to the discovery of admissible evidence and that it seeks information that is irrelevant, immaterial, or unnecessary to the issues in this Action.

In light of the foregoing objections, Plaintiff will not respond to this Request.

12. Admit that You called Amber Heard a “slut.”

ANSWER:

In addition to the foregoing General Objections and Objections to Definitions and Instructions, Plaintiff objects to this Request to the extent it is intended to harass Plaintiff, and constitutes an invasion of privacy. Plaintiff further objects to this Request as unlikely to lead to the discovery of admissible evidence and that it seeks information that is irrelevant, immaterial, or unnecessary to the issues in this Action.

In light of the foregoing objections, Plaintiff will not respond to this Request.

13. Admit that You called Amber Heard a “whore.”

ANSWER:

In addition to the foregoing General Objections and Objections to Definitions and Instructions, Plaintiff objects to this Request to the extent it is intended to harass Plaintiff, and constitutes an invasion of privacy. Plaintiff further objects to this Request as unlikely to lead to

the discovery of admissible evidence and that it seeks information that is irrelevant, immaterial, or unnecessary to the issues in this Action.

In light of the foregoing objections, Plaintiff will not respond to this Request.

14. Admit that You communicated to Amber Heard that she would not have any work as an actress when she got old and her “tits sag.”

ANSWER:

In addition to the foregoing General Objections and Objections to Definitions and Instructions, Plaintiff objects to this Request to the extent it is intended to harass Plaintiff, and constitutes an invasion of privacy. Plaintiff further objects to this Request as unlikely to lead to the discovery of admissible evidence and that it seeks information that is irrelevant, immaterial, or unnecessary to the issues in this Action.

In light of the foregoing objections, Plaintiff will not respond to this Request.

15. Admit that You told Amber Heard that she would, should, or wanted to “get raped.”

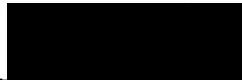
ANSWER:

In addition to the foregoing General Objections and Objections to Definitions and Instructions, Plaintiff objects to this Request to the extent it is intended to harass Plaintiff, and constitutes an invasion of privacy. Plaintiff further objects to this Request as unlikely to lead to the discovery of admissible evidence and that it seeks information that is irrelevant, immaterial, or unnecessary to the issues in this Action.

In light of the foregoing objections, Plaintiff will not respond to this Request.

Dated: December 20, 2019

Respectfully submitted,



Benjamin G. Chew (VSB #29113)
Elliot J. Weingarten (*pro hac vice*)
Camille M. Vasquez (*pro hac vice*)
Andrew C. Crawford (VSB #89093)
BROWN RUDNICK, LLP
601 Thirteenth Street NW, Suite 600
Washington, DC 20005
Phone: (202) 536-1785
Fax: (617) 289-0717
bchew@brownrudnick.com

- and -

Robert B. Gilmore (*pro hac vice*)
Kevin L. Attridge (*pro hac vice*)
STEIN MITCHELL BEATO & MISSNER LLP
901 15th Street NW, Suite 700
Washington, DC 20005
Phone: (202) 601-1589
Fax: (202) 296-8312
rgilmore@steinmitchell.com

Adam R. Waldman
THE ENDEAVOR GROUP LAW FIRM, P.C.
1775 Pennsylvania Avenue NW, Suite 350
Washington, DC 20006

Counsel for Plaintiff John C. Depp, II

CERTIFICATE OF SERVICE

I hereby certify that on this 20th day of December 2019, I caused copies of the foregoing to be served via email (per written agreement between the Parties) on the following:

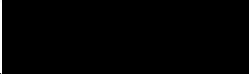
Roberta A. Kaplan (*pro hac vice*)
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KAPLAN HECKER & FINK, LLP
350 Fifth Avenue, Suite 7110
New York, New York 10118
Telephone: (212) 763-0883
rkaplan@kaplanhecker.com
jfink@kaplanhecker.com
jquinn@kaplanhecker.com

Davida Brook (*pro hac vice*)
SUSMAN GODFREY LLP
1900 Avenue of the Stars
Suite 1400
Los Angeles, California
Telephone: (310) 789-3105
dbrooke@susmangodfrey.com

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WOODS ROGERS PLC
10 S. Jefferson Street, Suite 1400
P.O. Box 14125
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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
Telephone: (703) 273-8898
Facsimile: (703) 273-8897
tmcevoy@cameronmcevoy.com
sroche@cameronmcevoy.com

Counsel for Defendant Amber Laura Heard


Benjamin G. Chew

VIRGINIA :

IN THE CIRCUIT COURT OF FAIRFAX COUNTY, VIRGINIA

JOHN C. DEPP, II

Plaintiff,

v.

AMBER LAURA HEARD,

Defendant.

Civil Action No.: CL-2019-0002911

PLAINTIFF JOHN C. DEPP, II'S SUPPLEMENTAL RESPONSES AND OBJECTIONS TO DEFENDANT AMBER LAURA HEARD'S FIRST REQUESTS FOR ADMISSION

Pursuant to Rule 4:11 of the Rules of the Supreme Court of Virginia and the Court's Order of August 10, 2020, Plaintiff John C. Depp, II, by and through his undersigned counsel, hereby responds and objects to Defendant Amber Laura Heard's First Set of Request For Admission (each, a "Request" and collectively, the "Requests"), dated November 15, 2019 and served in the above captioned action ("Action") as follows:

GENERAL OBJECTIONS

1. Plaintiff incorporates by reference as if fully set forth herein the General Objections contained in the Responses and Objections to Defendant's First Set of Requests for Production of Documents and Things to Plaintiff, dated September 3, 2019.

OBJECTIONS TO INSTRUCTIONS AND DEFINITIONS

Instructions

1. In accordance with the Rules of this Court, You shall answer the following Requests separately and fully, in writing.

q ***Plaintiff and/or Mr. Depp.*** The terms “Plaintiff” and/or “Mr. Depp” refer to Plaintiff John C. Depp, II, including his agents, representatives, employees, assigns, and all persons acting on his behalf.

RESPONSE: Plaintiff objects to this definition as overly broad and unduly burdensome, to the extent that it is inclusive of “agents, representatives, employees, assigns, and all persons acting on his behalf.” Plaintiff will interpret this term to exclude all privileged communications and documents.

r ***Romantic Partners.*** The term “Romantic Partners” shall mean any persons you have touched in a sexual manner in the past ten (10) years, meaning: (a) direct contact between any part of your body and another person’s genitalia, anus, groin, breast, inner thigh, or buttocks; or (b) direct contact between any part of a third party’s body and your genitalia, anus, groin, breast, inner thigh, or buttocks.

RESPONSE: Plaintiff objects to this definition as overly broad and unduly burdensome, vague and ambiguous to the extent it seeks to impose burdens beyond those required by the Rules. This term is overly broad in its ten year scope, and vague and ambiguous in its use of the terms “direct contact” and “sexual manner.” Plaintiff further objects to this term to the extent that it is inflammatory and harassing, assumes facts not in evidence, lacks foundation, calls for a medical and/or legal conclusion and seeks information unrelated to this case and that is unlikely to lead to the discovery of admissible evidence. Plaintiff will agree to meet and confer with Defendant regarding this term.

s ***You and/or Your.*** The terms “You” and/or “Your” refer to the recipient(s) of these discovery requests, as well as all persons and entities over which said recipient has “control” as understood by the Rules of this Court.

RESPONSE: No objection.

REQUESTS FOR ADMISSION

11. Admit that You destroyed or damaged property in the presence of Amber Heard.

ANSWER:

In addition to the foregoing General Objections and Objections to Definitions and Instructions, Plaintiff objects to this Request to the extent it is intended to harass Plaintiff, and constitutes an invasion of privacy. Plaintiff further objects to this Request as unlikely to lead to the discovery of admissible evidence and that it seeks information that is irrelevant, immaterial, or unnecessary to the issues in this Action.

In light of the foregoing objections, Plaintiff will not respond to this Request.

SUPPLEMENTAL ANSWER:

Plaintiff reiterates the objections stated above in its original Answer. Plaintiff further objects to this Request on the grounds it is vague and ambiguous as to the phrase “destroyed or damaged property.” The Request does not specify the type of property, the value of the property, the type of damage, nor the amount of damage. Subject to and without waiving any of the foregoing objections, Plaintiff responds as follows: Admit Plaintiff may have destroyed or damaged some type of property in the presence of Ms. Heard at some point, but without a more specific question that specifically identifies the property in question and describes the nature of the damage alleged, Mr. Depp is unable to further respond to this Request.

12: Admit that You called Amber Heard a “slut.”

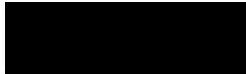
ANSWER:

In addition to the foregoing General Objections and Objections to Definitions and Instructions, Plaintiff objects to this Request to the extent it is intended to harass Plaintiff, and constitutes an invasion of privacy. Plaintiff further objects to this Request as unlikely to lead to the discovery of admissible evidence and that it seeks information that is irrelevant, immaterial, or unnecessary to the issues in this Action.

In light of the foregoing objections, Plaintiff will not respond to this Request.

Dated: August 21, 2020

Respectfully submitted,


Benjamin G. Chew (VSB #29113)
Camille M. Vasquez (*pro hac vice*)
Andrew C. Crawford (VSB #89093)
BROWN RUDNICK, LLP
601 Thirteenth Street NW, Suite 600
Washington, DC 20005
Phone: (202) 536-1785
Fax: (617) 289-0717
bchew@brownrudnick.com

- and -

Adam R. Waldman
THE ENDEAVOR GROUP LAW FIRM, P.C.
1775 Pennsylvania Avenue NW, Suite 350
Washington, DC 20006

Counsel for Plaintiff John C. Depp, II

CERTIFICATE OF SERVICE

I hereby certify that on this 21st day of August 2020, I caused copies of the foregoing to be served via email (per written agreement between the Parties) on the following:

A. 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
brottenborn@woodsrogers.com
jtreece@woodsrogers.com

Elaine Charlson Bredehoft (VSB No. 23766)
Carla D. Brown (VSB No. 44803)
Adam S. Nadelhaft (VSB No. 91717)
David E. Murphy (VSB No. 90938)
CHARLSON BREDEHOFT COHEN &
BROWN, P.C.
11260 Roger Bacon Dr., Suite 201
Reston, VA 20190
Phone: 703-318-6800
Fax: 703-318-6808
ebredehoft@cbcblaw.com
cbrown@cbcblaw.com
anahelhaft@cbcblaw.com
dmurphy@cbcblaw.com

Counsel for Defendant Amber Laura Heard



Andrew C. Crawford

contact between any part of Your body and another person's genitalia, anus, groin, breast, inner thigh, or buttocks; or (b) direct contact between any part of a third party's body and Your genitalia, anus, groin, breast, inner thigh, or buttocks.

RESPONSE: Plaintiff objects to this definition as overly broad and unduly burdensome, vague and ambiguous to the extent it seeks to impose burdens beyond those required by the Rules. This term is overly broad in its ten year scope, and vague and ambiguous in its use of the terms "direct contact" and "sexual manner." Plaintiff further objects to this term to the extent that it is inflammatory and harassing, assumes facts not in evidence, lacks foundation, calls for a medical and/or legal conclusion and seeks information unrelated to this case and that is unlikely to lead to the discovery of admissible evidence. Plaintiff will agree to meet and confer with Defendant regarding this term.

t. *You and/or Your.* The terms "You" and/or "Your" refer to the recipient(s) of these discovery requests, as well as all persons and entities over which said recipient has "control" as understood by the Rules of this Court.

RESPONSE: No objection.

REQUESTS FOR ADMISSION

1. Please admit that the document produced as DEPP19191 and attached as **Exh. 1** is a true, genuine, and authentic copy of a December 14, 2012 email exchange between Tracey Jacobs and Christi Dembrowski.

ANSWER:

Plaintiff objects to this request to the extent it seeks information that is in the possession, custody or control of Defendant or third parties. Plaintiff further objects to this request on the grounds that it is neither relevant nor reasonably calculated to lead to the discovery of admissible evidence. Plaintiff further objects to this request on the grounds and to the extent that it implicates private and/or confidential information that is not at issue. Plaintiff further objects to this request to the extent it seeks information that is available to and equally accessible to Defendant. Plaintiff further objects on the grounds Plaintiff is not included in this communication. Plaintiff objects to this request to the extent it seeks privileged information

protected from disclosure, including information protected by the attorney-client privilege or work product doctrine and any other applicable privilege, immunity or protection. Plaintiff further objects to this request as the request is compound. Plaintiff objects to this request because the request does not have the specific document appended to the request. Subject to the foregoing specific and general objections, and specifically reserving all objections to admissibility, including without limitation hearsay and relevance, Plaintiff admits that DEPP19191 appears to be a copy of an email between Tracey Jacobs and Christi Dembrowski. Because Plaintiff was not included on the communication, Plaintiff otherwise lacks sufficient knowledge to admit or deny whether the email is “a true, genuine, and authentic copy”.

2. Please admit that the document produced as DEPP19194-19196 and attached as **Exh. 2** is a true, genuine, and authentic copy of May 23, 2013 emails between Tracey Jacobs and Christi Dembrowski.

ANSWER:

Plaintiff objects to this request to the extent it seeks information that is in the possession, custody or control of Defendant or third parties. Plaintiff further objects to this request to the extent it seeks information that is available to and equally accessible to Defendant. Plaintiff further objects to this request on the grounds that it is neither relevant nor reasonably calculated to lead to the discovery of admissible evidence. Plaintiff further objects to this request on the grounds and to the extent that it implicates private and/or confidential information that is not at issue. Plaintiff further objects on the grounds Plaintiff is not included in this communication. Plaintiff objects to this request to the extent it seeks privileged information protected from disclosure, including information protected by the attorney-client privilege or work product doctrine and any other applicable privilege, immunity or protection. Plaintiff further objects to this request as the request is compound. Plaintiff objects to this request because the request does not have the specific document appended to the request. Subject to the foregoing specific and

general objections, and specifically reserving all objections to admissibility, including without limitation hearsay and relevance, Plaintiff admits that DEPP19194-19196 appears to be a copy of an email between Tracey Jacobs and Christi Dembrowski. Because Plaintiff was not included on the communication, Plaintiff otherwise lacks sufficient knowledge to admit or deny whether the email is “a true, genuine, and authentic copy”.

3. Please admit that the document produced as DEPP19207-19208 and attached as **Exh. 3** is a true, genuine, and authentic copy of December 29, 2013 emails between Tracey Jacobs and Christi Dembrowski.

ANSWER:

Plaintiff objects to this request to the extent it seeks information that is in the possession, custody or control of Defendant or third parties. Plaintiff further objects to this request on the grounds that it is neither relevant nor reasonably calculated to lead to the discovery of admissible evidence. Plaintiff further objects to this request on the grounds and to the extent that it implicates private and/or confidential information that is not at issue. Plaintiff further objects to this request to the extent it seeks information that is available to and equally accessible to Defendant. Plaintiff further objects on the grounds Plaintiff is not included in this communication. Plaintiff objects to this request to the extent it seeks privileged information protected from disclosure, including information protected by the attorney-client privilege or work product doctrine and any other applicable privilege, immunity or protection. Plaintiff further objects to this request as the request is compound. Plaintiff objects to this request because the request does not have the specific document appended to the request. Subject to the foregoing specific and general objections, and specifically reserving all objections to admissibility, including without limitation hearsay and relevance, Plaintiff admits that DEPP19207-19208 appears to be a copy of an email between Tracey Jacobs and Christi Dembrowski. Because

Plaintiff was not included on the communication, Plaintiff otherwise lacks sufficient knowledge to admit or deny whether the email is “a true, genuine, and authentic copy”.

4. Please admit that the document produced as DEPP19209 and attached as **Exh. 4** is a true, genuine, and authentic copy of a September 2, 2015 email between Tracey Jacobs, Christi Dembrowski, and Joel Mandel.

ANSWER:

Plaintiff objects to this request to the extent it seeks information that is in the possession, custody or control of Defendant or third parties. Plaintiff further objects to this request on the grounds that it is neither relevant nor reasonably calculated to lead to the discovery of admissible evidence. Plaintiff further objects to this request on the grounds and to the extent that it implicates private and/or confidential information that is not at issue. Plaintiff further objects to this request to the extent it seeks information that is available to and equally accessible to Defendant. Plaintiff further objects on the grounds Plaintiff is not included in this communication. Plaintiff objects to this request to the extent it seeks privileged information protected from disclosure, including information protected by the attorney-client privilege or work product doctrine and any other applicable privilege, immunity or protection. Plaintiff further objects to this request as the request is compound. Plaintiff objects to this request because the request does not have the specific document appended to the request. Subject to the foregoing specific and general objections, and specifically reserving all objections to admissibility, including without limitation hearsay and relevance, Plaintiff admits that DEPP19209 appears to be a copy of an email between Tracey Jacobs, Christi Dembrowski, and Joel Mandel. Because Plaintiff was not included on the communication, Plaintiff otherwise lacks sufficient knowledge to admit or deny whether the email is “a true, genuine, and authentic copy”.

5. Please admit that the document produced as DEPP19210 and attached as **Exh. 5** is a true, genuine, and authentic copy of an October 23, 2015 email between Tracey Jacobs and Joel Mandel.

ANSWER:

Plaintiff objects to this request to the extent it seeks information that is in the possession, custody or control of Defendant or third parties. Plaintiff further objects to this request on the grounds that it is neither relevant nor reasonably calculated to lead to the discovery of admissible evidence. Plaintiff further objects to this request on the grounds and to the extent that it implicates private and/or confidential information that is not at issue. Plaintiff further objects to this request to the extent it seeks information that is available to and equally accessible to Defendant. Plaintiff further objects on the grounds Plaintiff is not included in this communication. Plaintiff objects to this request to the extent it seeks privileged information protected from disclosure, including information protected by the attorney-client privilege or work product doctrine and any other applicable privilege, immunity or protection. Plaintiff further objects to this request as the request is compound. Plaintiff objects to this request because the request does not have the specific document appended to the request. Subject to the foregoing specific and general objections, and specifically reserving all objections to admissibility, including without limitation hearsay and relevance, Plaintiff admits that DEPP19210 appears to be a copy of an email between Tracey Jacobs and Joel Mandel. Because Plaintiff was not included on the communication, Plaintiff otherwise lacks sufficient knowledge to admit or deny whether the email is “a true, genuine, and authentic copy”.

6. Please admit that the document produced as DEPP19211 and attached as **Exh. 6** is a true, genuine, and authentic copy of November 14, 2015 emails between Andrew Thau, Raul Anaya, Tracey Jacobs, Joel Mandel, and the email address danny@bhdrl.com.

ANSWER:

Plaintiff objects to this request to the extent it seeks information that is in the possession, custody or control of Defendant or third parties. Plaintiff further objects to this request on the grounds that it is neither relevant nor reasonably calculated to lead to the discovery of admissible

evidence. Plaintiff further objects to this request on the grounds and to the extent that it implicates private and/or confidential information that is not at issue. Plaintiff further objects to this request to the extent it seeks information that is available to and equally accessible to Defendant. Plaintiff further objects on the grounds Plaintiff is not included in this communication. Plaintiff objects to this request to the extent it seeks privileged information protected from disclosure, including information protected by the attorney-client privilege or work product doctrine and any other applicable privilege, immunity or protection. Plaintiff further objects to this request as the request is compound. Plaintiff objects to this request because the request does not have the specific document appended to the request. Subject to the foregoing specific and general objections, and specifically reserving all objections to admissibility, including without limitation hearsay and relevance, Plaintiff admits that DEPP19211 appears to be a copy of an email between Andrew Thau, Raul Anaya, Tracey Jacobs, Joel Mandel, and the email address danny@bhdrl.com. Because Plaintiff was not included on the communication, Plaintiff otherwise lacks sufficient knowledge to admit or deny whether the email is “a true, genuine, and authentic copy”.

7. Please admit that the document produced as DEPP19213 and attached as **Exh. 7** is a true, genuine, and authentic copy of January 19-20, 2016 emails between Tracey Jacobs, Andrew Thau, Joel Mandel, and Jeremy Zimmer.

ANSWER:

Plaintiff objects to this request to the extent it seeks information that is in the possession, custody or control of Defendant or third parties. Plaintiff further objects to this request on the grounds that it is neither relevant nor reasonably calculated to lead to the discovery of admissible evidence. Plaintiff further objects to this request on the grounds and to the extent that it implicates private and/or confidential information that is not at issue. Plaintiff further objects to this request to the extent it seeks information that is available to and equally accessible to

Defendant. Plaintiff further objects on the grounds Plaintiff is not included in this communication. Plaintiff objects to this request to the extent it seeks privileged information protected from disclosure, including information protected by the attorney-client privilege or work product doctrine and any other applicable privilege, immunity or protection. Plaintiff further objects to this request as the request is compound. Plaintiff objects to this request because the request does not have the specific document appended to the request. Subject to the foregoing specific and general objections, and specifically reserving all objections to admissibility, including without limitation hearsay and relevance, Plaintiff admits that DEPP19213 appears to be a copy of an email between Tracey Jacobs, Andrew Thau, Joel Mandel, and Jeremy Zimmer. Because Plaintiff was not included on the communication, Plaintiff otherwise lacks sufficient knowledge to admit or deny whether the email is “a true, genuine, and authentic copy”.

8. Please admit that the document produced as DEPP19215 and attached as **Exh. 8** is a true, genuine, and authentic copy of a January 26, 2016 email between Tracey Jacobs, Jim Berkus, Jeremy Zimmer, Joel Mandel, and the email address jab@bhdrl.com.

ANSWER:

Plaintiff objects to this request to the extent it seeks information that is in the possession, custody or control of Defendant or third parties. Plaintiff further objects to this request on the grounds that it is neither relevant nor reasonably calculated to lead to the discovery of admissible evidence. Plaintiff further objects to this request on the grounds and to the extent that it implicates private and/or confidential information that is not at issue. Plaintiff further objects to this request to the extent it seeks information that is available to and equally accessible to Defendant. Plaintiff further objects on the grounds Plaintiff is not included in this communication. Plaintiff objects to this request to the extent it seeks privileged information protected from disclosure, including information protected by the attorney-client privilege or work product doctrine and any other applicable privilege, immunity or protection. Plaintiff

further objects to this request as the request is compound. Plaintiff objects to this request because the request does not have the specific document appended to the request. Subject to the foregoing specific and general objections, and specifically reserving all objections to admissibility, including without limitation hearsay and relevance, Plaintiff admits that DEPP19215 appears to be a copy of an email between Tracey Jacobs, Jim Berkus, Jeremy Zimmer, Joel Mandel, and the email address jab@bhdrl.com. Because Plaintiff was not included on the communication, Plaintiff otherwise lacks sufficient knowledge to admit or deny whether the email is “a true, genuine, and authentic copy”.

9. Please admit that the document produced as DEPP19216 and attached as **Exh. 9** is a true, genuine, and authentic copy of February 12, 2016 emails between Tracey Jacobs, Joel Mandel, Christi Dembrowski, and the email addresses danny@bhdrl.com, mls@bhdrl.com, and jab@bhdrl.com.

ANSWER:

Plaintiff objects to this request to the extent it seeks information that is in the possession, custody or control of Defendant or third parties. Plaintiff further objects to this request on the grounds that it is neither relevant nor reasonably calculated to lead to the discovery of admissible evidence. Plaintiff further objects to this request on the grounds and to the extent that it implicates private and/or confidential information that is not at issue. Plaintiff further objects to this request to the extent it seeks information that is available to and equally accessible to Defendant. Plaintiff further objects on the grounds Plaintiff is not included in this communication. Plaintiff objects to this request to the extent it seeks privileged information protected from disclosure, including information protected by the attorney-client privilege or work product doctrine and any other applicable privilege, immunity or protection. Plaintiff further objects to this request as the request is compound. Plaintiff objects to this request because the request does not have the specific document appended to the request. Subject to the foregoing

specific and general objections, and specifically reserving all objections to admissibility, including without limitation hearsay and relevance, Plaintiff admits that DEPP19216 appears to be a copy of an email between Tracey Jacobs, Joel Mandel, Christi Dembrowski, and the email addresses danny@bhdrl.com, mls@bhdrl.com, and jab@bhdrl.com. Because Plaintiff was not included on the communication, Plaintiff otherwise lacks sufficient knowledge to admit or deny whether the email is “a true, genuine, and authentic copy”.

10. Please admit that the document produced as DEPP19217 and attached as **Exh. 10** is a true, genuine, and authentic copy of a March 7, 2016 email between Tracey Jacobs and Joel Mandel.

ANSWER:

Plaintiff objects to this request to the extent it seeks information that is in the possession, custody or control of Defendant or third parties. Plaintiff further objects to this request on the grounds that it is neither relevant nor reasonably calculated to lead to the discovery of admissible evidence. Plaintiff further objects to this request on the grounds and to the extent that it implicates private and/or confidential information that is not at issue. Plaintiff further objects to this request to the extent it seeks information that is available to and equally accessible to Defendant. Plaintiff further objects on the grounds Plaintiff is not included in this communication. Plaintiff objects to this request to the extent it seeks privileged information protected from disclosure, including information protected by the attorney-client privilege or work product doctrine and any other applicable privilege, immunity or protection. Plaintiff further objects to this request as the request is compound. Plaintiff objects to this request because the request does not have the specific document appended to the request. Subject to the foregoing specific and general objections, and specifically reserving all objections to admissibility, including without limitation hearsay and relevance, Plaintiff admits that DEPP19217 appears to be a copy of an email between Tracey Jacobs and Joel Mandel. Because Plaintiff was not

included on the communication, Plaintiff otherwise lacks sufficient knowledge to admit or deny whether the email is “a true, genuine, and authentic copy”.

11. Please admit that the document produced as DEPP19218 and attached as **Exh. 11** is a true, genuine, and authentic copy of a March 9, 2016 email between Tracey Jacobs, Gueran Ducoty, Christi Dembrowski, Joel Mandel, Jenna Gates (Jacobs), and the email addresses danny@bhdrl.com and mls@bhdrl.com.

ANSWER:

Plaintiff objects to this request to the extent it seeks information that is in the possession, custody or control of Defendant or third parties. Plaintiff further objects to this request on the grounds that it is neither relevant nor reasonably calculated to lead to the discovery of admissible evidence. Plaintiff further objects to this request on the grounds and to the extent that it implicates private and/or confidential information that is not at issue. Plaintiff further objects to this request to the extent it seeks information that is available to and equally accessible to Defendant. Plaintiff further objects on the grounds Plaintiff is not included in this communication. Plaintiff objects to this request to the extent it seeks privileged information protected from disclosure, including information protected by the attorney-client privilege or work product doctrine and any other applicable privilege, immunity or protection. Plaintiff further objects to this request as the request is compound. Plaintiff objects to this request because the request does not have the specific document appended to the request. Subject to the foregoing specific and general objections, and specifically reserving all objections to admissibility, including without limitation hearsay and relevance, Plaintiff admits that DEPP19218 appears to be a copy of an email between Tracey Jacobs, Gueran Ducoty, Christi Dembrowski, Joel Mandel, Jenna Gates (Jacobs), and the email addresses danny@bhdrl.com and mls@bhdrl.com. Because Plaintiff was not included on the communication, Plaintiff otherwise lacks sufficient knowledge to admit or deny whether the email is “a true, genuine, and authentic copy”.

12. Please admit that the document produced as DEPP19219-19224 and attached as **Exh. 12** are true, genuine, and authentic copy of February 2-5, 2016 emails between Emily Speak, David Kitchen, Linda Curtis, Joel Mandel, Andrew Thau, Nicholas R. Dumas, Kevin Wells, and Alyssa Gallo.

ANSWER:

Plaintiff objects to this request to the extent it seeks information that is in the possession, custody or control of Defendant or third parties. Plaintiff further objects to this request on the grounds that it is neither relevant nor reasonably calculated to lead to the discovery of admissible evidence. Plaintiff further objects to this request on the grounds and to the extent that it implicates private and/or confidential information that is not at issue. Plaintiff further objects to this request to the extent it seeks information that is available to and equally accessible to Defendant. Plaintiff further objects on the grounds Plaintiff is not included in this communication. Plaintiff objects to this request to the extent it seeks privileged information protected from disclosure, including information protected by the attorney-client privilege or work product doctrine and any other applicable privilege, immunity or protection. Plaintiff further objects to this request as the request is compound. Plaintiff objects to this request because the request does not have the specific document appended to the request. Subject to the foregoing specific and general objections, and specifically reserving all objections to admissibility, including without limitation hearsay and relevance, Plaintiff admits that DEPP19219-19224 appears to be a copy of an email between Emily Speak, David Kitchen, Linda Curtis, Joel Mandel, Andrew Thau, Nicholas R. Dumas, Kevin Wells, and Alyssa Gallo. Because Plaintiff was not included on the communication, Plaintiff otherwise lacks sufficient knowledge to admit or deny whether the email is "a true, genuine, and authentic copy".

13. Please admit that the document produced as DEPP19225-19230 and attached as **Exh. 13** is a true, genuine, and authentic copy of the document titled "Agreement in Consideration of Guaranty" that was attached to the emails produced by Mr. Depp as DEPP19219-19224.

ANSWER:

Plaintiff objects to this request to the extent it seeks privileged information protected from disclosure, including information protected by the attorney-client privilege or work product doctrine and any other applicable privilege, immunity or protection. Plaintiff further objects to this request on the grounds that it is neither relevant nor reasonably calculated to lead to the discovery of admissible evidence. Plaintiff further objects to this request on the grounds and to the extent that it implicates private and/or confidential information that is not at issue. Plaintiff further objects to this request as the request is compound. Plaintiff objects to this request because the request does not have the specific document appended to the request. Subject to the foregoing specific and general objections, Plaintiff admits that DEPP19225-19230 appears to be "a true, genuine, and authentic copy" of a document titled "Agreement in Consideration of Guaranty".

14. Please admit that the document produced as DEPP19233 and attached as **Exh. 14** is a true, genuine, and authentic copy of November 15, 2014 emails between Tracey Jacobs and Christi Dembrowski.

ANSWER:

Plaintiff objects to this request to the extent it seeks information that is in the possession, custody or control of Defendant or third parties. Plaintiff further objects to this request to the extent it seeks information that is available to and equally accessible to Defendant. Plaintiff further objects to this request on the grounds that it is neither relevant nor reasonably calculated to lead to the discovery of admissible evidence. Plaintiff further objects to this request on the grounds and to the extent that it implicates private and/or confidential information that is not at issue. Plaintiff further objects on the grounds Plaintiff is not included in this communication. Plaintiff objects to this request to the extent it seeks privileged information protected from disclosure, including information protected by the attorney-client privilege or work product doctrine and any other applicable privilege, immunity or protection. Plaintiff further objects to

this request as the request is compound. Plaintiff objects to this request because the request does not have the specific document appended to the request. Subject to the foregoing specific and general objections, and specifically reserving all objections to admissibility, including without limitation hearsay and relevance, Plaintiff admits that DEPP19233 appears to be a copy of an email between Tracey Jacobs and Christi Dembrowski. Because Plaintiff was not included on the communication, Plaintiff otherwise lacks sufficient knowledge to admit or deny whether the email is “a true, genuine, and authentic copy”.

15. Please admit that the document produced as DEPP19234-19236 and attached as **Exh. 15** is a true, genuine, and authentic copy of February 26, 2015 emails between Tracey Jacobs and Christi Dembrowski.

ANSWER:

Plaintiff further objects to this request on the grounds that it is neither relevant nor reasonably calculated to lead to the discovery of admissible evidence. Plaintiff further objects to this request on the grounds and to the extent that it implicates private and/or confidential information that is not at issue. Plaintiff objects to this request to the extent it seeks information that is in the possession, custody or control of Defendant or third parties. Plaintiff further objects to this request to the extent it seeks information that is available to and equally accessible to Defendant. Plaintiff further objects on the grounds Plaintiff is not included in this communication. Plaintiff objects to this request to the extent it seeks privileged information protected from disclosure, including information protected by the attorney-client privilege or work product doctrine and any other applicable privilege, immunity or protection. Plaintiff further objects to this request as the request is compound. Plaintiff objects to this request because the request does not have the specific document appended to the request. Subject to the foregoing specific and general objections, and specifically reserving all objections to admissibility, including without limitation hearsay and relevance, Plaintiff admits that DEPP19234-19236

appears to be a copy of an email between Tracey Jacobs and Christi Dembrowski. Because Plaintiff was not included on the communication, Plaintiff otherwise lacks sufficient knowledge to admit or deny whether the email is “a true, genuine, and authentic copy”.

16. Please admit that the document produced as DEPP19237-19238 and attached as **Exh. 16** is a true, genuine, and authentic copy of February 27, 2015 emails between Tracey Jacobs, Sean Bailey, and Christi Dembrowski.

ANSWER:

Plaintiff objects to this request to the extent it seeks information that is in the possession, custody or control of Defendant or third parties. Plaintiff further objects to this request on the grounds that it is neither relevant nor reasonably calculated to lead to the discovery of admissible evidence. Plaintiff further objects to this request on the grounds and to the extent that it implicates private and/or confidential information that is not at issue. Plaintiff further objects to this request to the extent it seeks information that is available to and equally accessible to Defendant. Plaintiff further objects on the grounds Plaintiff is not included in this communication. Plaintiff objects to this request to the extent it seeks privileged information protected from disclosure, including information protected by the attorney-client privilege or work product doctrine and any other applicable privilege, immunity or protection. Plaintiff further objects to this request as the request is compound. Plaintiff objects to this request because the request does not have the specific document appended to the request. Subject to the foregoing specific and general objections, and specifically reserving all objections to admissibility, including without limitation hearsay and relevance, Plaintiff admits that DEPP19237-19238 appears to be a copy of an email between Tracey Jacobs, Sean Bailey, and Christi Dembrowski. Because Plaintiff was not included on the communication, Plaintiff otherwise lacks sufficient knowledge to admit or deny whether the email is “a true, genuine, and authentic copy”.

17. Please admit that the document produced as DEPP19239 and attached as **Exh. 17** is a true, genuine, and authentic copy of April 14-15, 2015 emails between Tracey Jacobs, Scott Cooper, John Leshner, and Christi Dembrowski.

ANSWER:

Plaintiff objects to this request to the extent it seeks information that is in the possession, custody or control of Defendant or third parties. Plaintiff further objects to this request to the extent it seeks information that is available to and equally accessible to Defendant. Plaintiff further objects to this request on the grounds that it is neither relevant nor reasonably calculated to lead to the discovery of admissible evidence. Plaintiff further objects to this request on the grounds and to the extent that it implicates private and/or confidential information that is not at issue. Plaintiff further objects on the grounds Plaintiff is not included in this communication. Plaintiff objects to this request to the extent it seeks privileged information protected from disclosure, including information protected by the attorney-client privilege or work product doctrine and any other applicable privilege, immunity or protection. Plaintiff further objects to this request as the request is compound. Plaintiff objects to this request because the request does not have the specific document appended to the request. Subject to the foregoing specific and general objections, and specifically reserving all objections to admissibility, including without limitation hearsay and relevance, Plaintiff admits that DEPP19239 appears to be a copy of an email between Tracey Jacobs, Scott Cooper, John Leshner, and Christi Dembrowski. Because Plaintiff was not included on the communication, Plaintiff otherwise lacks sufficient knowledge to admit or deny whether the email is “a true, genuine, and authentic copy”.

- 18: Please admit that the document produced as DEPP19240-19253 and attached as **Exh. 18** is a true, genuine, and authentic copy of text messages between Tracey Jacobs and Edward White.

ANSWER:

Plaintiff objects to this request to the extent it seeks information that is in the possession, custody or control of Defendant or third parties. Plaintiff further objects to this request to the extent it seeks information that is available to and equally accessible to Defendant. Plaintiff further objects to this request on the grounds that it is neither relevant nor reasonably calculated to lead to the discovery of admissible evidence. Plaintiff further objects to this request on the grounds and to the extent that it implicates private and/or confidential information that is not at issue. Plaintiff further objects on the grounds Plaintiff is not included in this communication. Plaintiff objects to this request to the extent it seeks privileged information protected from disclosure, including information protected by the attorney-client privilege or work product doctrine and any other applicable privilege, immunity or protection. Plaintiff further objects to this request as the request is compound. Plaintiff objects to this request because the request does not have the specific document appended to the request. Subject to the foregoing specific and general objections, and specifically reserving all objections to admissibility, including without limitation hearsay and relevance, Plaintiff admits that DEPP19240-19253 appears to be a copy of text messages between Tracey Jacobs and Edward White. Because Plaintiff was not included on the communication, Plaintiff otherwise lacks sufficient knowledge to admit or deny whether the email is “a true, genuine, and authentic copy”.

19. Please admit that the document produced as DEPP19254-19300 and attached as **Exh. 19** is a true, genuine, and authentic copy of July 18-October 26, 2016 text messages between Tracey Jacobs and Mr. Depp.

ANSWER:

Plaintiff objects to this request to the extent it seeks privileged information protected from disclosure, including information protected by the attorney-client privilege or work product doctrine and any other applicable privilege, immunity or protection. Plaintiff further objects to

this request on the grounds that it is neither relevant nor reasonably calculated to lead to the discovery of admissible evidence. Plaintiff further objects to this request on the grounds and to the extent that it implicates private and/or confidential information that is not at issue. Plaintiff further objects to this request as the request is compound. Plaintiff objects to this request because the request does not have the specific document appended to the request. Subject to the foregoing specific and general objections, and specifically reserving all objections to admissibility, including without limitation hearsay and relevance, Plaintiff admits DEPP19254-19300 appears to be a copy of text messages between Tracey Jacobs and Mr. Depp.

20. Please admit that the document produced as DEPP19790 and attached as **Exh. 20** is a true, genuine, and authentic copy of an April 14, 2015 email between Magdolna Nyeso, Edward Allanby, Joel Mandel, Joe Kaczorowski, Robert Corzo, Neil Shah, Jacob Bloom, Sandra Spierenburg, and Maarten Melchor.

ANSWER:

Plaintiff objects to this request to the extent it seeks information that is in the possession, custody or control of Defendant or third parties. Plaintiff further objects to this request on the grounds that it is neither relevant nor reasonably calculated to lead to the discovery of admissible evidence. Plaintiff further objects to this request on the grounds and to the extent that it implicates private and/or confidential information that is not at issue. Plaintiff further objects to this request to the extent it seeks information that is available to and equally accessible to Defendant. Plaintiff further objects on the grounds Plaintiff is not included in this communication. Plaintiff objects to this request to the extent it seeks privileged information protected from disclosure, including information protected by the attorney-client privilege or work product doctrine and any other applicable privilege, immunity or protection. Plaintiff further objects to this request as the request is compound. Plaintiff objects to this request because the request does not have the specific document appended to the request. Subject to the foregoing

specific and general objections, and specifically reserving all objections to admissibility, including without limitation hearsay and relevance, Plaintiff admits that DEPP19790 appears to be a copy of an email between Magdolna Nyeso, Edward Allanby, Joel Mandel, Joe Kaczorowski, Robert Corzo, Neil Shah, Jacob Bloom, Sandra Spierenburg, and Maarten Melchor. Because Plaintiff was not included on the communication, Plaintiff otherwise lacks sufficient knowledge to admit or deny whether the email is “a true, genuine, and authentic copy”.

21. Please admit that the document produced as DEPP19791-19795 and attached as **Exh. 21** is a true, genuine, and authentic copy of the attachment to the email produced by Mr. Depp as DEPP19790.

ANSWER:

Plaintiff objects to this request to the extent it seeks privileged information protected from disclosure, including information protected by the attorney-client privilege or work product doctrine and any other applicable privilege, immunity or protection. Plaintiff further objects to this request on the grounds that it is neither relevant nor reasonably calculated to lead to the discovery of admissible evidence. Plaintiff further objects to this request on the grounds and to the extent that it implicates private and/or confidential information that is not at issue. Plaintiff further objects to this request as the request is compound. Plaintiff objects to this request because the request does not have the specific document appended to the request. Subject to the foregoing specific and general objections, Plaintiff admits that DEPP19791-19795 appears to be a copy of the attachment.

22. Please admit that the document produced as DEPP19797-19798 and attached as **Exh. 22** is a true, genuine, and authentic copy of April 14 and April 21, 2016 emails and an attachment between Robert Corzo, Neil Shah, Donald Starr, Danny Watts, and Stanley Buchtal.

ANSWER:

Plaintiff objects to this request to the extent it seeks information that is in the possession, custody or control of Defendant or third parties. Plaintiff further objects to this request on the grounds that it is neither relevant nor reasonably calculated to lead to the discovery of admissible evidence. Plaintiff further objects to this request on the grounds and to the extent that it implicates private and/or confidential information that is not at issue. Plaintiff further objects to this request to the extent it seeks information that is available to and equally accessible to Defendant. Plaintiff further objects on the grounds Plaintiff is not included in this communication. Plaintiff objects to this request to the extent it seeks privileged information protected from disclosure, including information protected by the attorney-client privilege or work product doctrine and any other applicable privilege, immunity or protection. Plaintiff further objects to this request as the request is compound. Plaintiff objects to this request because the request does not have the specific document appended to the request. Subject to the foregoing specific and general objections, and specifically reserving all objections to admissibility, including without limitation hearsay and relevance, Plaintiff admits that DEPP19797-19798 appears to be a copy of emails between Robert Corzo, Neil Shah, Donald Starr, Danny Watts, and Stanley Buchtal. Because Plaintiff was not included on the communication, Plaintiff otherwise lacks sufficient knowledge to admit or deny whether the email is “a true, genuine, and authentic copy”.

23. Please admit that the document produced as DEPP19801-19839 and attached as **Exh. 23** is a true, genuine, and authentic copy of a document dated August 7, 2002, titled "Memorandum of Agreement," and with the Subject "PIRATES OF THE CARIBBEAN/ JOHNNY DEPP/ACTOR."

ANSWER:

Plaintiff objects to this request to the extent it seeks privileged information protected from disclosure, including information protected by the attorney-client privilege or work product doctrine and any other applicable privilege, immunity or protection. Plaintiff further objects to this request on the grounds that it is neither relevant nor reasonably calculated to lead to the discovery of admissible evidence. Plaintiff further objects to this request on the grounds and to the extent that it implicates private and/or confidential information that is not at issue. Plaintiff further objects to this request as the request is compound. Plaintiff objects to this request because the request does not have the specific document appended to the request. Subject to the foregoing specific and general objections, Plaintiff admits that DEPP19801-19839 appears to be a copy of a document titled "Memorandum of Agreement," and with the Subject "PIRATES OF THE CARIBBEAN'/ JOHNNY DEPP/ACTOR."

24. Please admit that the document produced as DEPP19840-19843 and attached as **Exh. 24** is a true, genuine, and authentic copy of a document dated August 7, 2002 titled "GUARANTY."

ANSWER:

Plaintiff objects to this request to the extent it seeks privileged information protected from disclosure, including information protected by the attorney-client privilege or work product doctrine and any other applicable privilege, immunity or protection. Plaintiff further objects to this request on the grounds that it is neither relevant nor reasonably calculated to lead to the discovery of admissible evidence. Plaintiff further objects to this request on the grounds and to the extent that it implicates private and/or confidential information that is not at issue. Plaintiff further objects to this request as the request is compound. Plaintiff objects to this request because the request does not have the specific document appended to the request. Subject to the foregoing

specific and general objections, Plaintiff admits that DEPP19840-19843 appears to be a copy of a document titled "GUARANTY."

25. Please admit that the document produced as DEPP19844-19849 and attached as **Exh. 25** is a true, genuine, and authentic copy of a document dated August 7, 2002 titled "FIRST MATE PRODUCTIONS, INC. ACTOR/LOAN-OUT STANDARD TERMS AND CONDITIONS."

ANSWER:

Plaintiff objects to this request to the extent it seeks privileged information protected from disclosure, including information protected by the attorney-client privilege or work product doctrine and any other applicable privilege, immunity or protection. Plaintiff further objects to this request on the grounds that it is neither relevant nor reasonably calculated to lead to the discovery of admissible evidence. Plaintiff further objects to this request on the grounds and to the extent that it implicates private and/or confidential information that is not at issue. Plaintiff further objects to this request as the request is compound. Plaintiff objects to this request because the request does not have the specific document appended to the request. Subject to the foregoing specific and general objections, Plaintiff admits that DEPP19844-19849 appears to be a copy of a document titled "FIRST MATE PRODUCTIONS, INC. ACTOR/LOAN-OUT STANDARD TERMS AND CONDITIONS."

26. Please admit that the document produced as DEPP19850-19852 and attached as **Exh. 26** is a true, genuine, and authentic copy of a document dated August 7, 2002 titled "RIDER TO THE STANDARD TERMS AND CONDITIONS FOR AN ACTOR (LOAN OUT)."

ANSWER:

Plaintiff objects to this request to the extent it seeks privileged information protected from disclosure, including information protected by the attorney-client privilege or work product doctrine and any other applicable privilege, immunity or protection. Plaintiff further objects to this request on the grounds that it is neither relevant nor reasonably calculated to lead to the

discovery of admissible evidence. Plaintiff further objects to this request on the grounds and to the extent that it implicates private and/or confidential information that is not at issue. Plaintiff further objects to this request as the request is compound. Plaintiff objects to this request because the request does not have the specific document appended to the request. Subject to the foregoing specific and general objections, Plaintiff admits that DEPP19850-19852 appears to be a copy of a document titled "RIDER TO THE STANDARD TERMS AND CONDITIONS FOR AN ACTOR (LOAN OUT)."

27. Please admit that the document produced as DEPP19853-19865 and attached as **Exh. 27** is a true, genuine, and authentic copy of an August 7, 2002 document titled "Exhibit 'CB'".

ANSWER:

Plaintiff objects to this request to the extent it seeks privileged information protected from disclosure, including information protected by the attorney-client privilege or work product doctrine and any other applicable privilege, immunity or protection. Plaintiff further objects to this request on the grounds that it is neither relevant nor reasonably calculated to lead to the discovery of admissible evidence. Plaintiff further objects to this request on the grounds and to the extent that it implicates private and/or confidential information that is not at issue. Plaintiff further objects to this request as the request is compound. Plaintiff objects to this request because the request does not have the specific document appended to the request. Subject to the foregoing specific and general objections, Plaintiff admits that DEPP19853-19865 appears to be a copy of a document titled "EXHIBIT 'CB'".

28. Please admit that the document produced as DEPP19866-19876 and attached as **Exh. 28** is a true, genuine, and authentic copy of a document dated August 7, 2002 titled "RIDER TO EXHIBIT 'CB'".

ANSWER:

Plaintiff objects to this request to the extent it seeks privileged information protected from disclosure, including information protected by the attorney-client privilege or work product doctrine and any other applicable privilege, immunity or protection. Plaintiff further objects to this request on the grounds that it is neither relevant nor reasonably calculated to lead to the discovery of admissible evidence. Plaintiff further objects to this request on the grounds and to the extent that it implicates private and/or confidential information that is not at issue. Plaintiff further objects to this request as the request is compound. Plaintiff objects to this request because the request does not have the specific document appended to the request. Subject to the foregoing specific and general objections, Plaintiff admits that DEPP19866-19876 appears to be a true, copy of a document titled "RIDER TO EXHIBIT 'CB'."

29. Please admit that the document produced as DEPP19877-19887 and attached as **Exh. 29** is a true, genuine, and authentic copy of a document dated August 7, 2002 titled "Exhibit DRCB."

ANSWER:

Plaintiff objects to this request to the extent it seeks privileged information protected from disclosure, including information protected by the attorney-client privilege or work product doctrine and any other applicable privilege, immunity or protection. Plaintiff further objects to this request on the grounds that it is neither relevant nor reasonably calculated to lead to the discovery of admissible evidence. Plaintiff further objects to this request on the grounds and to the extent that it implicates private and/or confidential information that is not at issue. Plaintiff further objects to this request as the request is compound. Plaintiff objects to this request because the request does not have the specific document appended to the request. Subject to the foregoing specific and general objections, Plaintiff admits that DEPP19877-19887 appears to be a of a document titled "EXHIBIT DRCB."

30. Please admit that the document produced as DEPP19888-19897 and attached as **Exh. 30** is a true, genuine, and authentic copy of a document dated August 7, 2002 titled "RIDER TO EXHIBIT 'DRCB'."

ANSWER:

Plaintiff objects to this request to the extent it seeks privileged information protected from disclosure, including information protected by the attorney-client privilege or work product doctrine and any other applicable privilege, immunity or protection. Plaintiff further objects to this request on the grounds that it is neither relevant nor reasonably calculated to lead to the discovery of admissible evidence. Plaintiff further objects to this request on the grounds and to the extent that it implicates private and/or confidential information that is not at issue. Plaintiff further objects to this request as the request is compound. Plaintiff objects to this request because the request does not have the specific document appended to the request. Subject to the foregoing specific and general objections, Plaintiff admits that DEPP19888-19897 appears to be a copy of a document titled "RIDER TO EXHIBIT DRCB."

31. Please admit that the document produced as DEPP19906-19954 and attached as **Exh. 31** is a true, genuine, and authentic copy of a document dated August 28, 2008, titled "Memorandum of Agreement," and with the Subject "'ALICE IN WONDERLAND'/JOHNNY DEPP/ACTOR."

ANSWER:

Plaintiff objects to this request to the extent it seeks privileged information protected from disclosure, including information protected by the attorney-client privilege or work product doctrine and any other applicable privilege, immunity or protection. Plaintiff further objects to this request on the grounds that it is neither relevant nor reasonably calculated to lead to the discovery of admissible evidence. Plaintiff further objects to this request on the grounds and to the extent that it implicates private and/or confidential information that is not at issue. Plaintiff further objects to this request as the request is compound. Plaintiff objects to this request because

the request does not have the specific document appended to the request. Subject to the foregoing specific and general objections, Plaintiff admits that DEPP19906-19954 appears to be “a true, genuine, and authentic copy” of a document titled “ALICE IN WONDERLAND'/JOHNNY DEPP/ACTOR.”

32. Please admit that the document produced as DEPP20019-20063 and attached as **Exh. 32** is a true, genuine, and authentic copy of an October 8, 2014 document titled "Tyron Management Services Limited."

ANSWER:

Plaintiff objects to this request to the extent it seeks privileged information protected from disclosure, including information protected by the attorney-client privilege or work product doctrine and any other applicable privilege, immunity or protection. Plaintiff further objects to this request on the grounds that it is neither relevant nor reasonably calculated to lead to the discovery of admissible evidence. Plaintiff further objects to this request on the grounds and to the extent that it implicates private and/or confidential information that is not at issue. Plaintiff further objects to this request as the request is compound. Plaintiff objects to this request because the request does not have the specific document appended to the request. Subject to the foregoing specific and general objections, Plaintiff admits that DEPP20019-20063 appears to be a copy of a document titled “Tyron Management Services Limited.”

33. Please admit that the document produced as DEPP20078 and attached as **Exh. 33** is a true, genuine, and authentic copy of a November 1, 2016 email from Michael Sinclair to Jacob Bloom, Edward White, Andrew Thau, Bryan Freedman, and the email address ssroloff@caa.com.

ANSWER:

Plaintiff objects to this request to the extent it seeks information that is in the possession, custody or control of Defendant or third parties. Plaintiff further objects to this request on the grounds that it is neither relevant nor reasonably calculated to lead to the discovery of admissible

evidence. Plaintiff further objects to this request on the grounds and to the extent that it implicates private and/or confidential information that is not at issue. Plaintiff further objects to this request to the extent it seeks information that is available to and equally accessible to Defendant. Plaintiff further objects on the grounds Plaintiff is not included in this communication. Plaintiff objects to this request to the extent it seeks privileged information protected from disclosure, including information protected by the attorney-client privilege or work product doctrine and any other applicable privilege, immunity or protection. Plaintiff further objects to this request as the request is compound. Plaintiff objects to this request because the request does not have the specific document appended to the request. Subject to the foregoing specific and general objections, and specifically reserving all objections to admissibility, including without limitation hearsay and relevance, Plaintiff admits that DEPP20078 appears to be a copy of an email from Michael Sinclair to Jacob Bloom, Edward White, Andrew Thau, Bryan Freedman, and the email address ssroloff@caa.com. Because Plaintiff was not included on the communication, Plaintiff otherwise lacks sufficient knowledge to admit or deny whether the email is a copy.

34. Please admit that the document produced as DEPP20079-20084 and attached as **Exh. 34** is a true, genuine, and authentic copy of the attachment to the email produced by Mr. Depp as DEPP20078.

ANSWER:

Plaintiff objects to this request to the extent it seeks privileged information protected from disclosure, including information protected by the attorney-client privilege or work product doctrine and any other applicable privilege, immunity or protection. Plaintiff further objects to this request on the grounds that it is neither relevant nor reasonably calculated to lead to the discovery of admissible evidence. Plaintiff further objects to this request on the grounds and to the extent that it implicates private and/or confidential information that is not at issue. Plaintiff

further objects to this request as the request is compound. Plaintiff objects to this request because the request does not have the specific document appended to the request. Subject to the foregoing specific and general objections, and specifically reserving all objections to admissibility, including without limitation hearsay and relevance, Plaintiff admits that DEPP20079-20084 appears to be a copy of a letter addressed to Mr. Depp.

35. Please admit that the document produced as DEPP20086-20087 and attached as **Exh. 35** is a true, genuine, and authentic copy of September 30, 2015 emails between Tracey Jacobs and Christi Dembrowski.

ANSWER:

Plaintiff objects to this request to the extent it seeks information that is in the possession, custody or control of Defendant or third parties. Plaintiff further objects to this request on the grounds that it is neither relevant nor reasonably calculated to lead to the discovery of admissible evidence. Plaintiff further objects to this request on the grounds and to the extent that it implicates private and/or confidential information that is not at issue. Plaintiff further objects to this request to the extent it seeks information that is available to and equally accessible to Defendant. Plaintiff further objects on the grounds Plaintiff is not included in this communication. Plaintiff objects to this request to the extent it seeks privileged information protected from disclosure, including information protected by the attorney-client privilege or work product doctrine and any other applicable privilege, immunity or protection. Plaintiff further objects to this request as the request is compound. Plaintiff objects to this request because the request does not have the specific document appended to the request. Subject to the foregoing specific and general objections, and specifically reserving all objections to admissibility, including without limitation hearsay and relevance, Plaintiff admits that DEPP20086-20087 appears to be a copy of emails between Tracey Jacobs and Christi Dembrowski. Because

Plaintiff was not included on the communication, Plaintiff otherwise lacks sufficient knowledge to admit or deny whether the email is “a true, genuine, and authentic copy”.

36. Please admit that the document produced as DEPP20088 and attached as **Exh. 36** is a true, genuine, and authentic copy of a September 2, 2015 email between Tracey Jacobs, Joel Mandel, and Christi Dembrowski.

ANSWER:

Plaintiff objects to this request to the extent it seeks information that is in the possession, custody or control of Defendant or third parties. Plaintiff further objects to this request on the grounds that it is neither relevant nor reasonably calculated to lead to the discovery of admissible evidence. Plaintiff further objects to this request on the grounds and to the extent that it implicates private and/or confidential information that is not at issue. Plaintiff further objects to this request to the extent it seeks information that is available to and equally accessible to Defendant. Plaintiff further objects on the grounds Plaintiff is not included in this communication. Plaintiff objects to this request to the extent it seeks privileged information protected from disclosure, including information protected by the attorney-client privilege or work product doctrine and any other applicable privilege, immunity or protection. Plaintiff further objects to this request as the request is compound. Plaintiff objects to this request because the request does not have the specific document appended to the request. Subject to the foregoing specific and general objections, and specifically reserving all objections to admissibility, including without limitation hearsay and relevance, Plaintiff admits that DEPP20088 appears to be a copy of an email between Tracey Jacobs, Joel Mandel, and Christi Dembrowski. Because Plaintiff was not included on the communication, Plaintiff otherwise lacks sufficient knowledge to admit or deny whether the email is “a true, genuine, and authentic copy”.

37. Please admit that the document produced as DEPP20089 and attached as **Exh. 37** is a true, genuine, and authentic copy of September 10, 2015 emails between Andrew Thau, Tracey Jacobs, Christi Dembrowski, and the email address danny@bhdrl.com.

ANSWER:

Plaintiff objects to this request to the extent it seeks information that is in the possession, custody or control of Defendant or third parties. Plaintiff further objects to this request on the grounds that it is neither relevant nor reasonably calculated to lead to the discovery of admissible evidence. Plaintiff further objects to this request on the grounds and to the extent that it implicates private and/or confidential information that is not at issue. Plaintiff further objects to this request to the extent it seeks information that is available to and equally accessible to Defendant. Plaintiff further objects on the grounds Plaintiff is not included in this communication. Plaintiff objects to this request to the extent it seeks privileged information protected from disclosure, including information protected by the attorney-client privilege or work product doctrine and any other applicable privilege, immunity or protection. Plaintiff further objects to this request as the request is compound. Plaintiff objects to this request because the request does not have the specific document appended to the request. Subject to the foregoing specific and general objections, and specifically reserving all objections to admissibility, including without limitation hearsay and relevance, Plaintiff admits that DEPP20089 appears to be a copy of emails between Andrew Thau, Tracey Jacobs, Christi Dembrowski, and the email address danny@bhdrl.com. Because Plaintiff was not included on the communication, Plaintiff otherwise lacks sufficient knowledge to admit or deny whether the email is “a true, genuine, and authentic copy”.

38. Please admit that the document produced as DEPP20090 and attached as **Exh. 38** is a true, genuine, and authentic copy of March 24, 2016 emails between Bec Smith, Tracey Jacobs, Rena Ronson, Jim Meenaghan, Jeremy Landau, and Christi Dembrowski.

ANSWER:

Plaintiff objects to this request to the extent it seeks information that is in the possession, custody or control of Defendant or third parties. Plaintiff further objects to this request on the

grounds that it is neither relevant nor reasonably calculated to lead to the discovery of admissible evidence. Plaintiff further objects to this request on the grounds and to the extent that it implicates private and/or confidential information that is not at issue. Plaintiff further objects to this request to the extent it seeks information that is available to and equally accessible to Defendant. Plaintiff further objects on the grounds Plaintiff is not included in this communication. Plaintiff objects to this request to the extent it seeks privileged information protected from disclosure, including information protected by the attorney-client privilege or work product doctrine and any other applicable privilege, immunity or protection. Plaintiff further objects to this request as the request is compound. Plaintiff objects to this request because the request does not have the specific document appended to the request. Subject to the foregoing specific and general objections, and specifically reserving all objections to admissibility, including without limitation hearsay and relevance, Plaintiff admits that DEPP20090 appears to be a copy of emails between Bec Smith, Tracey Jacobs, Rena Ronson, Jim Meenaghan, Jeremy Landau, and Christi Dembrowski. Because Plaintiff was not included on the communication, Plaintiff otherwise lacks sufficient knowledge to admit or deny whether the email is “a true, genuine, and authentic copy”.

39. Please admit that the document produced as DEPP19205 and attached as **Exh. 39** is a true, genuine, and authentic copy of November 22, 2013 emails between Tracey Jacobs, Christi Dembrowski, Joel Mandel, Rachel Arlook (Jacobs), and the email addresses jab@bhdrl.com, danny@bhdrl.com, and mls@nhdrl.com.

ANSWER:

Plaintiff objects to this request to the extent it seeks information that is in the possession, custody or control of Defendant or third parties. Plaintiff further objects to this request on the grounds that it is neither relevant nor reasonably calculated to lead to the discovery of admissible evidence. Plaintiff further objects to this request on the grounds and to the extent that it

implicates private and/or confidential information that is not at issue. Plaintiff further objects to this request to the extent it seeks information that is available to and equally accessible to Defendant. Plaintiff further objects on the grounds Plaintiff is not included in this communication. Plaintiff objects to this request to the extent it seeks privileged information protected from disclosure, including information protected by the attorney-client privilege or work product doctrine and any other applicable privilege, immunity or protection. Plaintiff further objects to this request as the request is compound. Plaintiff objects to this request because the request does not have the specific document appended to the request. Subject to the foregoing specific and general objections, and specifically reserving all objections to admissibility, including relevance and hearsay, Plaintiff admits that the document appears to be a copy of an email among Tracey Jacobs and Christi Dembrowski. Plaintiff was not copied and is otherwise unable to admit or deny the authenticity.

40. Please admit that the document produced as DEPP19206 and attached as **Exh. 40** is a true, genuine, and authentic copy of December 6, 2013 emails between Tracey Jacobs and Joel Mandel.

ANSWER:

Plaintiff objects to this request to the extent it seeks information that is in the possession, custody or control of Defendant or third parties. Plaintiff further objects to this request on the grounds that it is neither relevant nor reasonably calculated to lead to the discovery of admissible evidence. Plaintiff further objects to this request on the grounds and to the extent that it implicates private and/or confidential information that is not at issue. Plaintiff further objects to this request to the extent it seeks information that is available to and equally accessible to Defendant. Plaintiff further objects on the grounds Plaintiff is not included in this communication. Plaintiff objects to this request to the extent it seeks privileged information protected from disclosure, including information protected by the attorney-client privilege or

work product doctrine and any other applicable privilege, immunity or protection. Plaintiff further objects to this request as the request is compound. Plaintiff objects to this request because the request does not have the specific document appended to the request. Subject to the foregoing specific and general objections, and specifically reserving all objections to admissibility, including without limitation hearsay and relevance, Plaintiff admits that DEPP19206 appears to be a copy of emails between Tracey Jacobs and Joel Mandel. Because Plaintiff was not included on the communication, Plaintiff otherwise lacks sufficient knowledge to admit or deny whether the email is “a true, genuine, and authentic copy”.

41. Please admit that the document produced as DEPP19212 and attached as **Exh. 41** is a true, genuine, and authentic copy of a November 16, 2015 email between Tracey Jacobs and Joel Mandel.

ANSWER:

Plaintiff objects to this request to the extent it seeks information that is in the possession, custody or control of Defendant or third parties. Plaintiff further objects to this request on the grounds that it is neither relevant nor reasonably calculated to lead to the discovery of admissible evidence. Plaintiff further objects to this request on the grounds and to the extent that it implicates private and/or confidential information that is not at issue. Plaintiff further objects to this request to the extent it seeks information that is available to and equally accessible to Defendant. Plaintiff further objects on the grounds Plaintiff is not included in this communication. Plaintiff objects to this request to the extent it seeks privileged information protected from disclosure, including information protected by the attorney-client privilege or work product doctrine and any other applicable privilege, immunity or protection. Plaintiff further objects to this request as the request is compound. Plaintiff objects to this request because the request does not have the specific document appended to the request. Subject to the foregoing specific and general objections, and specifically reserving all objections to admissibility,

including without limitation hearsay and relevance, Plaintiff admits that DEPP19212 appears to be a copy of an email between Tracey Jacobs and Joel Mandel. Because Plaintiff was not included on the communication, Plaintiff otherwise lacks sufficient knowledge to admit or deny whether the email is “a true, genuine, and authentic copy”.

42. Please admit that the document produced as DEPP19796 and attached as **Exh. 42** is a true, genuine, and authentic copy of April 18, 2016 emails between Jacob Bloom and Donald Starr.

ANSWER:

Plaintiff objects to this request to the extent it seeks information that is in the possession, custody or control of Defendant or third parties. Plaintiff further objects to this request on the grounds that it is neither relevant nor reasonably calculated to lead to the discovery of admissible evidence. Plaintiff further objects to this request on the grounds and to the extent that it implicates private and/or confidential information that is not at issue. Plaintiff further objects to this request to the extent it seeks information that is available to and equally accessible to Defendant. Plaintiff further objects on the grounds Plaintiff is not included in this communication. Plaintiff objects to this request to the extent it seeks privileged information protected from disclosure, including information protected by the attorney-client privilege or work product doctrine and any other applicable privilege, immunity or protection. Plaintiff further objects to this request as the request is compound. Plaintiff objects to this request because the request does not have the specific document appended to the request. Subject to the foregoing specific and general objections, and specifically reserving all objections to admissibility, including relevance and hearsay, Plaintiff admits that the document appears to be a copy of an email among Jacob Bloom and Donald Starr. Plaintiff was not copied and is otherwise unable to admit or deny the authenticity.


43. Please admit that the document produced as DEPP20064 and attached as **Exh. 43** is a true, genuine, and authentic copy of January 6-7, 2015 emails between Joe Kaczorowski, Danny Watts, and Donald Starr.

ANSWER:

Plaintiff objects to this request to the extent it seeks information that is in the possession, custody or control of Defendant or third parties. Plaintiff further objects to this request on the grounds that it is neither relevant nor reasonably calculated to lead to the discovery of admissible evidence. Plaintiff further objects to this request on the grounds and to the extent that it implicates private and/or confidential information that is not at issue. Plaintiff further objects to this request to the extent it seeks information that is available to and equally accessible to Defendant. Plaintiff further objects on the grounds Plaintiff is not included in this communication. Plaintiff objects to this request to the extent it seeks privileged information protected from disclosure, including information protected by the attorney-client privilege or work product doctrine and any other applicable privilege, immunity or protection. Plaintiff further objects to this request as the request is compound. Plaintiff objects to this request because the request does not have the specific document appended to the request. Subject to the foregoing specific and general objections, and specifically reserving all objections to admissibility, including relevance and hearsay, Plaintiff admits that the document appears to be a copy of an email among Joe Kaczorowski, Danny Watts, and Donald Starr. Plaintiff was not copied and is otherwise unable to admit or deny the authenticity.

Dated: February 25, 2021

Respectfully submitted,



Benjamin G. Chew (VSB #29113)
Andrew C. Crawford (VSB #89093)
BROWN RUDNICK, LLP
601 Thirteenth Street NW, Suite 600
Washington, DC 20005
Phone: (202) 536-1785
Fax: (617) 289-0717
bchew@brownrudnick.com
acrawford@brownrudnick.com

Leo J. Presiado (*pro hac vice*)
Camille M. Vasquez (*pro hac vice*)
BROWN RUDNICK, LLP
2211 Michelson Drive, Seventh Floor
Irvine, CA 92612
Phone: (949) 752-7100
Fax: (949) 252-1514
lpresiado@brownrudnick.com
cvasquez@brownrudnick.com

Jessica N. Meyers (*pro hac vice*)
BROWN RUDNICK LLP
7 Times Square
New York, New York 10036
Phone: (212) 209-4938
Fax: (212) 209-4801
jmeyers@brownrudnick.com

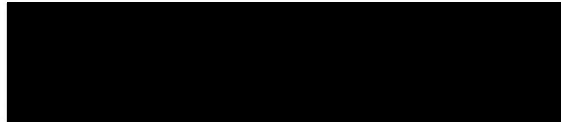
*Counsel for Plaintiff and
Counterclaim Defendant John C. Depp, II*

CERTIFICATE OF SERVICE

I hereby certify that on this 25th day of February 2021, I caused copies of the foregoing to be served via email (per written agreement between the Parties) on the following:

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
brottenborn@woodsrogers.com
jtreece@woodsrogers.com

Elaine Charlson Bredehoft (VSB No. 23766)
Carla D. Brown (VSB No. 44803)
Adam S. Nadelhaft (VSB No. 91717)
David E. Murphy (VSB No. 90938)
CHARLSON BREDEHOFT COHEN &
BROWN, P.C.
11260 Roger Bacon Dr., Suite 201
Reston, VA 20190
Telephone: 703-318-6800
Facsimile: 703-318-6808
ebredehoft@cbcblaw.com
cbrown@cbcblaw.com
anadelhaft@cbcblaw.com
dmurphy@cbcblaw.com


Benjamin G. Chew

performance in which third parties, whether known or unknown to Mr. Depp, contemplated featuring him.

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

RESPONSE: No objection.

u. ***Romantic Partners.*** The terms “Romantic Partners” shall mean any persons You have touched in a sexual manner in the past ten (10) years, meaning: (a) direct contact between any part of Your body and another person’s genitalia, anus, groin, breast, inner thigh, or buttocks; or (b) direct contact between any part of a third party’s body and Your genitalia, anus, groin, breast, inner thigh, or buttocks.

RESPONSE: Plaintiff objects to this definition as overly broad and unduly burdensome, vague and ambiguous to the extent it seeks to impose burdens beyond those required by the Rules. This term is overly broad in its ten-year scope, and vague and ambiguous in its use of the terms “direct contact” and “sexual manner.” Plaintiff further objects to this term to the extent that it is inflammatory and harassing, assumes facts not in evidence, lacks foundation, calls for a medical and/or legal conclusion and seeks information unrelated to this case and that is unlikely to lead to the discovery of admissible evidence. Plaintiff will agree to meet and confer with Defendant regarding this term.

v. ***You and/or Your.*** The terms “You” and/or “Your” refer to the recipient(s) of these discovery requests, as well as all persons and entities over which said recipient has “control” as understood by the Rules of this Court.

RESPONSE: No objection.

REQUESTS FOR ADMISSION

1. Please admit the document produced by Ms. Heard as bates number ALH3473-3493 and attached as **Ex. 1** is a true, genuine, and authentic copy of an article entitled “The Trouble With Johnny Depp” published by Rolling Stone on June 21, 2018.

ANSWER:

Plaintiff objects to this request to the extent it seeks information that is in the possession, custody or control of Defendant or third parties. Plaintiff further objects to this request on the grounds that it is neither relevant nor reasonably calculated to lead to the discovery of admissible evidence. Plaintiff further objects to this request to the extent it seeks information that is available to and equally accessible to Defendant. Plaintiff further objects on the basis that Plaintiff had no involvement in the preparation/publication of this document. Subject to the foregoing specific and general objections, and specifically reserving all objections to admissibility, including without limitation hearsay and relevance, Plaintiff admits that ALH3473-3493 appears to be a copy of an article entitled “The Trouble With Johnny Depp” published by Rolling Stone. Plaintiff otherwise lacks sufficient knowledge to admit or deny whether the document is “a true, genuine, and authentic copy.”

2. Please admit the document attached as Ex. 2 is a true, genuine, and authentic copy of the “Approved Judgment” dated November 2, 2020, issued in the High Court of Justice, Queen's Bench Division, Before Mr. Justice Nicol, Case No.: QB-2018-006323.

ANSWER:

Plaintiff objects to this request to the extent it seeks information that is available to and equally accessible to Defendant. Plaintiff further objects to this request on the grounds that it is neither relevant nor reasonably calculated to lead to the discovery of admissible evidence. Subject to the foregoing specific and general objections, and specifically reserving all objections to admissibility, including without limitation hearsay and relevance, Plaintiff admits that Ex. 2 appears to be a true, genuine, and authentic copy of the “Approved Judgment” dated November 2, 2020, issued in the High Court of Justice, Queen’s Bench Division, Before Mr. Justice Nicol, Case No.: QB-2018-006323.

3. Please admit the document produced by Ms. Heard as bates number ALH2871- 2875 and attached as **Ex. 3** is a true, genuine, and authentic copy of an article entitled “Apparently Drunk Johnny Depp Cut Off at a Hollywood Film Awards Ceremony” published by The Guardian on November 15, 2014.

ANSWER:

Plaintiff objects to this request to the extent it seeks information that is in the possession, custody or control of Defendant or third parties. Plaintiff further objects to this request on the grounds that it is neither relevant nor reasonably calculated to lead to the discovery of admissible evidence. Plaintiff further objects to this request to the extent it seeks information that is available to and equally accessible to Defendant. Plaintiff further objects on the basis that Plaintiff had no involvement in the preparation/publication of this document. Subject to the foregoing specific and general objections, and specifically reserving all objections to admissibility, including without limitation hearsay and relevance, Plaintiff admits that ALH2871- 2875 appears to be a copy of an article entitled “Apparently Drunk Johnny Depp Cut Off at a Hollywood Film Awards Ceremony” published by The Guardian. Plaintiff otherwise lacks sufficient knowledge to admit or deny whether the document is “a true, genuine, and authentic copy.”

4. Please admit the document produced by Ms. Heard as bates number ALH2913- 2915 and attached as **Ex. 4** is a true, genuine, and authentic copy of an article entitled “Johnny Depp Is On His Way To Becoming The Most Overpaid Actor in Hollywood” published on January 23, 2015.

ANSWER:

Plaintiff objects to this request to the extent it seeks information that is in the possession, custody or control of Defendant or third parties. Plaintiff further objects to this request on the grounds that it is neither relevant nor reasonably calculated to lead to the discovery of admissible evidence. Plaintiff further objects to this request to the extent it seeks information that is available to and equally accessible to Defendant. Plaintiff further objects on the basis that

Plaintiff had no involvement in the preparation/publication of this document. Subject to the foregoing specific and general objections, and specifically reserving all objections to admissibility, including without limitation hearsay and relevance, Plaintiff admits that ALH2913- 2915 appears to be a copy of an article entitled “Johnny Depp Is On His Way To Becoming The Most Overpaid Actor in Hollywood” published on January 23, 2015. Plaintiff otherwise lacks sufficient knowledge to admit or deny whether the document is “a true, genuine, and authentic copy.”

5. Please admit the document produced by Ms. Heard as bates number ALH2928- 2929 and attached as Ex. 5 is a true, genuine, and authentic copy of an article entitled “Has Johnny Depp Become Hollywood's Biggest Joke?” published by on January 24, 2015.

ANSWER:

Plaintiff objects to this request to the extent it seeks information that is in the possession, custody or control of Defendant or third parties. Plaintiff further objects to this request on the grounds that it is neither relevant nor reasonably calculated to lead to the discovery of admissible evidence. Plaintiff further objects to this request to the extent it seeks information that is available to and equally accessible to Defendant. Plaintiff further objects on the basis that Plaintiff had no involvement in the preparation/publication of this document. Subject to the foregoing specific and general objections, and specifically reserving all objections to admissibility, including without limitation hearsay and relevance, Plaintiff admits that ALH2928- 2929 appears to be a copy of an article entitled “Has Johnny Depp Become Hollywood's Biggest Joke?” published by on January 24, 2015. Plaintiff otherwise lacks sufficient knowledge to admit or deny whether the document is “a true, genuine, and authentic copy.”

6. Please admit the document produced by Ms. Heard as bates number ALH2938- 2939 and attached as **Ex. 6** is a true, genuine, and authentic copy of an article entitled “Mortdecai Review: Johnny Depp Reaches an Irreversible Tipping Point of Awfulness” published on January 26, 2015.

ANSWER:

Plaintiff objects to this request to the extent it seeks information that is in the possession, custody or control of Defendant or third parties. Plaintiff further objects to this request on the grounds that it is neither relevant nor reasonably calculated to lead to the discovery of admissible evidence. Plaintiff further objects to this request to the extent it seeks information that is available to and equally accessible to Defendant. Plaintiff further objects on the basis that Plaintiff had no involvement in the preparation/publication of this document. Subject to the foregoing specific and general objections, and specifically reserving all objections to admissibility, including without limitation hearsay and relevance, Plaintiff admits that ALH2938- 2939 appears to be a copy of an article entitled “Mortdecai Review: Johnny Depp Reaches an Irreversible Tipping Point of Awfulness” published on January 26, 2015. Plaintiff otherwise lacks sufficient knowledge to admit or deny whether the document is “a true, genuine, and authentic copy.”

7. Please admit the document produced by Ms. Heard as bates number ALH3002- 3003 and attached as **Ex. 7** is a true, genuine, and authentic copy of an article entitled “What Happened to Johnny Depp” published on September 11, 2015.

ANSWER:

Plaintiff objects to this request to the extent it seeks information that is in the possession, custody or control of Defendant or third parties. Plaintiff further objects to this request on the grounds that it is neither relevant nor reasonably calculated to lead to the discovery of admissible evidence. Plaintiff further objects to this request to the extent it seeks information that is available to and equally accessible to Defendant. Plaintiff further objects on the basis that

Plaintiff had no involvement in the preparation/publication of this document. Subject to the foregoing specific and general objections, and specifically reserving all objections to admissibility, including without limitation hearsay and relevance, Plaintiff admits that ALH3002- 3003 appears to be a copy of an article entitled “What Happened to Johnny Depp” published on September 11, 2015. Plaintiff otherwise lacks sufficient knowledge to admit or deny whether the document is “a true, genuine, and authentic copy.”

8. Please admit the document produced by Ms. Heard as bates number ALH3113- 3117 and attached as **Ex. 8** is a true, genuine, and authentic copy of an article entitled “Johnny Depp: Friends And Family Seriously Concerned About Him, Here's Why” published by Inquisitr on May 7, 2016.

ANSWER:

Plaintiff objects to this request to the extent it seeks information that is in the possession, custody or control of Defendant or third parties. Plaintiff further objects to this request on the grounds that it is neither relevant nor reasonably calculated to lead to the discovery of admissible evidence. Plaintiff further objects to this request to the extent it seeks information that is available to and equally accessible to Defendant. Plaintiff further objects on the basis that Plaintiff had no involvement in the preparation/publication of this document. Subject to the foregoing specific and general objections, and specifically reserving all objections to admissibility, including without limitation hearsay and relevance, Plaintiff admits that ALH3113- 3117 appears to be a copy of an article entitled “Johnny Depp: Friends And Family Seriously Concerned About Him, Here's Why” published by Inquisitr. Plaintiff otherwise lacks sufficient knowledge to admit or deny whether the document is “a true, genuine, and authentic copy.”

9. Please admit the document produced by Ms. Heard as bates number ALH3203-3205 and attached as **Ex. 9** is a true, genuine, and authentic copy of an article entitled “CAA Signs Johnny Depp, Ending Long Run at UTA” published by Deadline on October 27, 2016.

ANSWER:

Plaintiff objects to this request to the extent it seeks information that is in the possession, custody or control of Defendant or third parties. Plaintiff further objects to this request on the grounds that it is neither relevant nor reasonably calculated to lead to the discovery of admissible evidence. Plaintiff further objects to this request to the extent it seeks information that is available to and equally accessible to Defendant. Plaintiff further objects on the basis that Plaintiff had no involvement in the preparation/publication of this document. Subject to the foregoing specific and general objections, and specifically reserving all objections to admissibility, including without limitation hearsay and relevance, Plaintiff admits that ALH3203-3205 appears to be a copy of an article entitled “CAA Signs Johnny Depp, Ending Long Run at UTA” published by Deadline. Plaintiff otherwise lacks sufficient knowledge to admit or deny whether the document is “a true, genuine, and authentic copy.”

10. Please admit the document produced by Ms. Heard as bates number ALH3262- 3264 and attached as **Ex. 10** is a true, genuine, and authentic copy of an article entitled “Johnny Depp Spent \$3m Blasting Hunter S Thompson’s Ashes from Cannon, Ex-Managers Claim” published by The Guardian on February 1, 2017.

ANSWER:

Plaintiff objects to this request to the extent it seeks information that is in the possession, custody or control of Defendant or third parties. Plaintiff further objects to this request on the grounds that it is neither relevant nor reasonably calculated to lead to the discovery of admissible evidence. Plaintiff further objects to this request to the extent it seeks information that is available to and equally accessible to Defendant. Plaintiff further objects on the basis that Plaintiff had no involvement in the preparation/publication of this document. Subject to the

foregoing specific and general objections, and specifically reserving all objections to admissibility, including without limitation hearsay and relevance, Plaintiff admits that ALH3262- 3264 appears to be a copy of an article entitled “Johnny Depp Spent \$3m Blasting Hunter S Thompson’s Ashes from Cannon, Ex-Managers Claim” published by The Guardian. Plaintiff otherwise lacks sufficient knowledge to admit or deny whether the document is “a true, genuine, and authentic copy.”

11. Please admit the document produced by Ms. Heard as bates number ALH3270- 3288 and attached as **Ex. 11** is a true, genuine, and authentic copy of an article entitled “Johnny Depp: A Star in Crisis and the Insane Story of His ‘Missing’ Millions” published by The Hollywood Reporter on May 10, 2017.

ANSWER:

Plaintiff objects to this request to the extent it seeks information that is in the possession, custody or control of Defendant or third parties. Plaintiff further objects to this request on the grounds that it is neither relevant nor reasonably calculated to lead to the discovery of admissible evidence. Plaintiff further objects to this request to the extent it seeks information that is available to and equally accessible to Defendant. Plaintiff further objects on the basis that Plaintiff had no involvement in the preparation/publication of this document. Subject to the foregoing specific and general objections, and specifically reserving all objections to admissibility, including without limitation hearsay and relevance, Plaintiff admits that ALH3270- 3288 appears to be a copy of an article entitled “Johnny Depp: A Star in Crisis and the Insane Story of His ‘Missing’ Millions” published by The Hollywood Reporter. Plaintiff otherwise lacks sufficient knowledge to admit or deny whether the document is “a true, genuine, and authentic copy.”

12. Please admit the document produced by Ms. Heard as bates number ALH3289- 3297 and attached as **Ex. 12** is a true, genuine, and authentic copy of an article entitled “Johnny Depp's Financial Woes Might Sink the Next *Pirates of the Caribbean*” published by Vanity Fair- HWD on May 10, 2017.

ANSWER:

Plaintiff objects to this request to the extent it seeks information that is in the possession, custody or control of Defendant or third parties. Plaintiff further objects to this request on the grounds that it is neither relevant nor reasonably calculated to lead to the discovery of admissible evidence. Plaintiff further objects to this request to the extent it seeks information that is available to and equally accessible to Defendant. Plaintiff further objects on the basis that Plaintiff had no involvement in the preparation/publication of this document. Subject to the foregoing specific and general objections, and specifically reserving all objections to admissibility, including without limitation hearsay and relevance, Plaintiff admits that ALH3289- 3297 appears to be a copy of an article entitled “Johnny Depp's Financial Woes Might Sink the Next *Pirates of the Caribbean*” published by Vanity Fair- HWD. Plaintiff otherwise lacks sufficient knowledge to admit or deny whether the document is “a true, genuine, and authentic copy.”

13. Please admit the document produced by Ms. Heard as bates number ALH3344 and attached as **Ex. 13** is a true, genuine, and authentic copy of a June 23, 2017, 9:04 PM tweet by Donald Trump Jr. stating “I’d think it would be hard for @Disney to keep him, let’s see: #FireDepp Goes VIRAL after ‘Trump Assassination’ Joke.”

ANSWER:

Plaintiff objects to this request to the extent it seeks information that is in the possession, custody or control of Defendant or third parties. Plaintiff further objects to this request to the extent it seeks information that is available to and equally accessible to Defendant. Plaintiff further objects to this request on the grounds that it is neither relevant nor reasonably calculated to lead to the discovery of admissible evidence. Plaintiff further objects on the basis that Plaintiff had no involvement in the preparation/publication of this document. Subject to the foregoing specific and general objections, and specifically reserving all objections to

admissibility, including without limitation hearsay and relevance, Plaintiff admits that ALH3344 appears to be a copy of a June 23, 2017, 9:04 PM tweet by Donald Trump Jr. Plaintiff otherwise lacks sufficient knowledge to admit or deny whether the document is “a true, genuine, and authentic copy.”

14. Please admit the document produced by Ms. Heard as bates number ALH3347-3349 and attached as **Ex. 14** is a true, genuine, and authentic copy of an article entitled “White House Condemns Johnny Depp’s Presidential Assassination Remark: ‘Sad’” published by Deadline on June 23, 2017.

ANSWER:

Plaintiff objects to this request to the extent it seeks information that is in the possession, custody or control of Defendant or third parties. Plaintiff further objects to this request on the grounds that it is neither relevant nor reasonably calculated to lead to the discovery of admissible evidence. Plaintiff further objects to this request to the extent it seeks information that is available to and equally accessible to Defendant. Plaintiff further objects on the basis that Plaintiff had no involvement in the preparation/publication of this document. Subject to the foregoing specific and general objections, and specifically reserving all objections to admissibility, including without limitation hearsay and relevance, Plaintiff admits that ALH3347-3349 appears to be a copy of an article entitled “White House Condemns Johnny Depp’s Presidential Assassination Remark: ‘Sad’” published by Deadline. Plaintiff otherwise lacks sufficient knowledge to admit or deny whether the document is “a true, genuine, and authentic copy.”

15. Please admit the quote attributed to Mr. Depp in the document produced by Ms. Heard as bates number ALH3348, “I’m not an actor. I lie for a living,” is a true, genuine, and authentic quote by Mr. Depp.

ANSWER:

Plaintiff objects to this request on the grounds that it is neither relevant nor reasonably calculated to lead to the discovery of admissible evidence. Plaintiff further objects to this request to the extent it is intended to harass Plaintiff and is immaterial or unnecessary to the issues in this Action. Plaintiff further objects to this request because the request does not have the specific document appended to the request.

16. Please admit the document produced by Ms. Heard as bates number ALH3361- 3365 and attached as **Ex. 15** is a true, genuine, and authentic copy of an article entitled “#FireDepp Trends on Twitter as Outrage Mounts for Disney to Fire an Apologetic Johnny Depp” published by Inquisitr on June 24, 2017.

ANSWER:

Plaintiff objects to this request to the extent it seeks information that is in the possession, custody or control of Defendant or third parties. Plaintiff further objects to this request on the grounds that it is neither relevant nor reasonably calculated to lead to the discovery of admissible evidence. Plaintiff further objects to this request to the extent it seeks information that is available to and equally accessible to Defendant. Plaintiff further objects on the basis that Plaintiff had no involvement in the preparation/publication of this document. Subject to the foregoing specific and general objections, and specifically reserving all objections to admissibility, including without limitation hearsay and relevance, Plaintiff admits that ALH3361- 3365 appears to be a copy of an article entitled “#FireDepp Trends on Twitter as Outrage Mounts for Disney to Fire an Apologetic Johnny Depp” published by Inquisitr. Plaintiff otherwise lacks sufficient knowledge to admit or deny whether the document is “a true, genuine, and authentic copy.”

17. Please admit the document produced by Ms. Heard as bates number ALH3368- 3370 and attached as **Ex. 16** is a true, genuine, and authentic copy of an article entitled “Trump’s Family Hits Back at Johnny Depp’s Assassination Joke” published by The Sydney Morning Herald on June 25, 2017.

ANSWER:

Plaintiff objects to this request to the extent it seeks information that is in the possession, custody or control of Defendant or third parties. Plaintiff further objects to this request on the grounds that it is neither relevant nor reasonably calculated to lead to the discovery of admissible evidence. Plaintiff further objects to this request to the extent it seeks information that is available to and equally accessible to Defendant. Plaintiff further objects on the basis that Plaintiff had no involvement in the preparation/publication of this document. Subject to the foregoing specific and general objections, and specifically reserving all objections to admissibility, including without limitation hearsay and relevance, Plaintiff admits that ALH3368- 3370 appears to be a copy of an article entitled “Trump’s Family Hits Back at Johnny Depp’s Assassination Joke” published by The Sydney Morning Herald. Plaintiff otherwise lacks sufficient knowledge to admit or deny whether the document is “a true, genuine, and authentic copy.”

18. Please admit the document produced by Ms. Heard as bates number ALH3406- 3410 and attached as Ex. 17 is a true, genuine, and authentic copy of an article entitled “Johnny Depp Allegedly Showed Up Drunk to Movie Premiere, Reports Say” published by Celebrity News on November 4, 2017.

ANSWER:

Plaintiff objects to this request to the extent it seeks information that is in the possession, custody or control of Defendant or third parties. Plaintiff further objects to this request on the grounds that it is neither relevant nor reasonably calculated to lead to the discovery of admissible evidence. Plaintiff further objects to this request to the extent it seeks information that is available to and equally accessible to Defendant. Plaintiff further objects on the basis that Plaintiff had no involvement in the preparation/publication of this document.” Subject to the foregoing specific and general objections, and specifically reserving all objections to

admissibility, including without limitation hearsay and relevance, Plaintiff admits that ALH3406- 3410 appears to be a copy of an article entitled “Johnny Depp Allegedly Showed Up Drunk to Movie Premiere, Reports Say” published by Celebrity News. Plaintiff otherwise lacks sufficient knowledge to admit or deny whether the document is “a true, genuine, and authentic copy.”

19. Please admit the document produced by Ms. Heard as bates number ALH3511- 3520 and attached as **Ex. 18** is a true, genuine, and authentic copy of an article entitled “Vodka for Breakfast, 72-hour Drug Binges and Spending Sprees that Beggar Belief: ALISON BOSHOFF Reveals Why Hollywood’s Reeling Over What’s Being Called Johnny Depp’s Career Suicide Note” published by Dailymail.com on June 22, 2018.

ANSWER:

Plaintiff objects to this request to the extent it seeks information that is in the possession, custody or control of Defendant or third parties. Plaintiff further objects to this request on the grounds that it is neither relevant nor reasonably calculated to lead to the discovery of admissible evidence. Plaintiff further objects to this request to the extent it seeks information that is available to and equally accessible to Defendant. Plaintiff further objects on the basis that Plaintiff had no involvement in the preparation/publication of this document. Subject to the foregoing specific and general objections, and specifically reserving all objections to admissibility, including without limitation hearsay and relevance, Plaintiff admits that ALH3511- 3520 appears to be a copy of an article entitled “Vodka for Breakfast, 72-hour Drug Binges and Spending Sprees that Beggar Belief: ALISON BOSHOFF Reveals Why Hollywood’s Reeling Over What’s Being Called Johnny Depp’s Career Suicide Note” published by Dailymail.com. Plaintiff otherwise lacks sufficient knowledge to admit or deny whether the document is “a true, genuine, and authentic copy.”

20. Please admit the document produced by Ms. Heard as bates number ALH3553- 3557 and attached as **Ex. 19** is a true, genuine, and authentic copy of an article entitled “Johnny Depp Sued for Allegedly Punching Crew Member on Film Set” published by Independent on July 10, 2018.

ANSWER:

Plaintiff objects to this request to the extent it seeks information that is in the possession, custody or control of Defendant or third parties. Plaintiff further objects to this request on the grounds that it is neither relevant nor reasonably calculated to lead to the discovery of admissible evidence. Plaintiff further objects to this request to the extent it seeks information that is available to and equally accessible to Defendant. Plaintiff further objects on the basis that Plaintiff had no involvement in the preparation/publication of this document. Subject to the foregoing specific and general objections, and specifically reserving all objections to admissibility, including without limitation hearsay and relevance, Plaintiff admits that ALH3553- 3557 appears to be a copy of an article entitled “Johnny Depp Sued for Allegedly Punching Crew Member on Film Set” published by Independent. Plaintiff otherwise lacks sufficient knowledge to admit or deny whether the document is “a true, genuine, and authentic copy.”

21. Please admit the document produced by Ms. Heard as bates number ALH3565- 3570 and attached as **Ex. 20** is a true, genuine, and authentic copy of an article entitled “*Pirates of the Caribbean* is Getting a Reboot (Yes, Reboot) from the *Deadpool* Writers” published by Vanity Fair-HWD on October 24, 2018.

ANSWER:

Plaintiff objects to this request to the extent it seeks information that is in the possession, custody or control of Defendant or third parties. Plaintiff further objects to this request on the grounds that it is neither relevant nor reasonably calculated to lead to the discovery of admissible evidence. Plaintiff further objects to this request to the extent it seeks information that is available to and equally accessible to Defendant. Plaintiff further objects on the basis that

Plaintiff had no involvement in the preparation/publication of this document. Subject to the foregoing specific and general objections, and specifically reserving all objections to admissibility, including without limitation hearsay and relevance, Plaintiff admits that ALH3565- 3570 appears to be a copy of an article entitled “*Pirates of the Caribbean* is Getting a Reboot (Yes, Reboot) from the *Deadpool* Writers” published by Vanity Fair-HWD. Plaintiff otherwise lacks sufficient knowledge to admit or deny whether the document is “a true, genuine, and authentic copy.”

22. Please admit the document produced by Ms. Heard as bates number ALH3585- 3591 and attached as **Ex. 21** is a true, genuine, and authentic copy of an article entitled “EXCLUSIVE: Hide the Rum! Johnny Depp is OUT as Jack Sparrow in Disney’s *Pirates of the Caribbean* Film Franchise as Actor Battles Financial Issues and Personal Dramas” published by DailyMail.com on October 25, 2018.

ANSWER:

Plaintiff objects to this request to the extent it seeks information that is in the possession, custody or control of Defendant or third parties. Plaintiff further objects to this request on the grounds that it is neither relevant nor reasonably calculated to lead to the discovery of admissible evidence. Plaintiff further objects to this request to the extent it seeks information that is available to and equally accessible to Defendant. Plaintiff further objects on the basis that Plaintiff had no involvement in the preparation/publication of this document. Subject to the foregoing specific and general objections, and specifically reserving all objections to admissibility, including without limitation hearsay and relevance, Plaintiff admits that ALH3585- 3591 appears to be a copy of an article entitled “EXCLUSIVE: Hide the Rum! Johnny Depp is OUT as Jack Sparrow in Disney’s *Pirates of the Caribbean* Film Franchise as Actor Battles Financial Issues and Personal Dramas” published by DailyMail.com. Plaintiff otherwise lacks sufficient knowledge to admit or deny whether the document is “a true, genuine, and authentic copy.”

23. Please admit the document produced by Ms. Heard as bates number ALH3671- 3676 and attached as Ex. 22 is a true, genuine, and authentic copy of an article entitled “Johnny Depp ‘Dropped from Pirates of The Caribbean’” published by skynews on October 27, 2018.

ANSWER:

Plaintiff objects to this request to the extent it seeks information that is in the possession, custody or control of Defendant or third parties. Plaintiff further objects to this request on the grounds that it is neither relevant nor reasonably calculated to lead to the discovery of admissible evidence. Plaintiff further objects to this request to the extent it seeks information that is available to and equally accessible to Defendant. Plaintiff further objects on the basis that Plaintiff had no involvement in the preparation/publication of this document. Subject to the foregoing specific and general objections, and specifically reserving all objections to admissibility, including without limitation hearsay and relevance, Plaintiff admits that ALH3671- 3676 appears to be a copy of an article entitled “Johnny Depp ‘Dropped from Pirates of The Caribbean’” published by skynews. Plaintiff otherwise lacks sufficient knowledge to admit or deny whether the document is “a true, genuine, and authentic copy.”

24. Please admit the document produced by Ms. Heard as bates number ALH3694- 3696 and attached as Ex. 23 is a true, genuine, and authentic copy of an article entitled “Is Johnny Depp’s Career Reaching It’s End?” published by Entertainment on November 20, 2018.

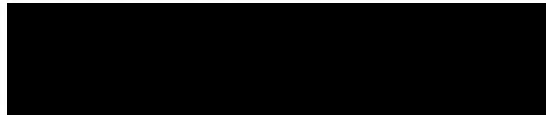
ANSWER:

Plaintiff objects to this request to the extent it seeks information that is in the possession, custody or control of Defendant or third parties. Plaintiff further objects to this request on the grounds that it is neither relevant nor reasonably calculated to lead to the discovery of admissible evidence. Plaintiff further objects to this request to the extent it seeks information that is available to and equally accessible to Defendant. Plaintiff further objects on the basis that Plaintiff had no involvement in the preparation/publication of this document. Subject to the

foregoing specific and general objections, and specifically reserving all objections to admissibility, including without limitation hearsay and relevance, Plaintiff admits that ALH3694- 3696 appears to be a copy of an article entitled “Is Johnny Depp’s Career Reaching It’s End?” published by Entertainment. Plaintiff otherwise lacks sufficient knowledge to admit or deny whether the document is “a true, genuine, and authentic copy.”

Dated: March 3, 2021

Respectfully submitted,



Benjamin G. Chew (VSB #29113)
Andrew C. Crawford (VSB #89093)
BROWN RUDNICK, LLP
601 Thirteenth Street NW, Suite 600
Washington, DC 20005
Phone: (202) 536-1785
Fax: (617) 289-0717
bchew@brownrudnick.com
acrawford@brownrudnick.com

Leo J. Presiado (*pro hac vice*)
Camille M. Vasquez (*pro hac vice*)
BROWN RUDNICK, LLP
2211 Michelson Drive, Seventh Floor
Irvine, CA 92612
Phone: (949) 752-7100
Fax: (949) 252-1514
lpresiado@brownrudnick.com
cvasquez@brownrudnick.com

Jessica N. Meyers (*pro hac vice*)
BROWN RUDNICK LLP
7 Times Square
New York, New York 10036
Phone: (212) 209-4938
Fax: (212) 209-4801
jmeyers@brownrudnick.com

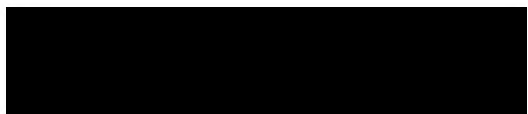
*Counsel for Plaintiff and
Counterclaim Defendant John C. Depp, II*

CERTIFICATE OF SERVICE

I hereby certify that on this 3rd day of March 2021, I caused copies of the foregoing to be served via email (per written agreement between the Parties) on the following:

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
brottenborn@woodsrogers.com
jtreece@woodsrogers.com

Elaine Charlson Bredehoft (VSB No. 23766)
Carla D. Brown (VSB No. 44803)
Adam S. Nadelhaft (VSB No. 91717)
David E. Murphy (VSB No. 90938)
CHARLSON BREDEHOFT COHEN &
BROWN, P.C.
11260 Roger Bacon Dr., Suite 201
Reston, VA 20190
Telephone: 703-318-6800
Facsimile: 703-318-6808
ebredehoft@cbcblaw.com
cbrown@cbcblaw.com
anadelhaft@cbcblaw.com
dmurphy@cbcblaw.com



Benjamin G. Chew