

# Attachment 1

**VIRGINIA:**

**IN THE CIRCUIT COURT OF FAIRFAX COUNTY**

JOHN C. DEPP, II,

Plaintiff and Counterclaim Defendant,

v.

AMBER LAURA HEARD,

Defendant and Counterclaim Plaintiff.

Civil Action No.: CL-2019-0002911

**PROTECTIVE ORDER RESPECTING DEPOSITION OF AMBER HEARD**

THIS MATTER CAME ON TO BE HEARD upon the emergency motion of Defendant and Counterclaim Plaintiff Amber Laura Heard (“Ms. Heard”), for a Protective Order to require Plaintiff and Counterclaim Defendant John C. Depp II (“Mr. Depp”) to ensure appropriate safety precautions and protocols are in place in preparation for and during Ms. Heard’s deposition commensurate with the precautions and protocols exercised for Mr. Depp’s deposition as updated by ██████████ law and CDC guidelines, communicating such protocols and precautions to Ms. Heard and her counsel, and providing for a default of a Zoom deposition in the event any of the conditions set forth in this Order are not fully complied with, it is hereby:

**ORDERED** that it shall be the responsibility of both Mr. Depp’s and Ms. Heard’s counsel to ensure the following safety precautions and protocols are completed and met for the duration of Ms. Heard’s deposition:

- 1) The persons physically present at the deposition, including Ms. Heard, counsel/support staff on behalf of Ms. Heard and Mr. Depp, the court reporter, and videographer shall attest to being fully vaccinated and having received a booster shot (collectively, the “Authorized Individuals”). Anyone not attesting to being fully

vaccinated and having received the booster shot may not be present in the conference room where the deposition is being held at any time, and may not come within 20 feet of Ms. Heard and her counsel/support staff; and

- 2) All Authorized Individuals physically present in the deposition room or in any of the areas where Ms. Heard and her counsel/support staff may be located, such as reception areas, restrooms, separate conference room (“Contact Areas”), shall wear N95 or KN95 masks the entire time they are in the Contact Areas where Authorized Individuals are present, and may only briefly remove their masks for purposes of drinking a beverage while others are present; and it is further

**ORDERED** that it shall be the responsibility of Mr. Depp and Mr. Depp’s counsel to ensure the following safety precautions and protocols are completed in advance of and maintained for the duration of Ms. Heard’s deposition:

- 3) Securing a room and table for the deposition sufficient to ensure six feet of separation between Ms. Heard and her counsel/support staff and any of Mr. Depp’s counsel/support staff, the court reporter, and the videographer at all times;
- 4) Notifying the local police department of the deposition, including location, date and time and the potential for members of the public (including press and fans of either Mr. Depp or Ms. Heard) to appear, and the history of death threats to Ms. Heard during the UK trial, so appropriate arrangements can be made for either side to contact the police department in the event of encountering any situation warranting police involvement and to remove any non-authorized members of the public from interfering with or disrupting the parties orderly access to and from the building and while in the building and handling any potential threats;

- 5) Making arrangements with management of the building where the deposition is taking place to deep clean and sanitize all Contact Areas the night before the deposition, and each night for the duration of the deposition;
- 6) Making arrangements with management of the building where the deposition is taking place to clean and sanitize each restroom used by any Authorized Individual each evening for the duration of the deposition;
- 7) Making arrangements with management of the building where the deposition is taking place for sufficient security procedures to ensure no individual will have access to the floor on which the deposition or access into the Contact Areas except for the Authorized Individuals and the employees/other individuals associated with the law firm where the deposition is taking place;
- 8) Making arrangements with management of the building where the deposition is taking place for Ms. Heard and her counsel to enter and exit through a private garage and entrance/exit each day of the deposition, and ensuring no members of the public are in those areas;
- 9) Making necessary arrangements for a separate room for breaks/lunch and for delivery of lunch for Ms. Heard and her counsel each day, to further ensure no unnecessary or further risks from contact with others to Ms. Heard and her counsel/support staff for the duration of the deposition;
- 10) Making necessary arrangements with the court reporter/videographer service to provide plexiglass dividers for each Authorized Individual in the deposition room; and it is further

**ORDERED** that Mr. Depp's counsel shall provide to Ms. Heard's counsel, no later than 5:30 p.m. Eastern Time on Friday, January 7, 2022, the following:

- 11) Confirming Mr. Depp's counsel have taken the steps set forth in ¶¶ 3-10 above and will follow through with and adhere to them; and
- 12) Providing the contact name and telephone number for the Officer from the local police department to be called in the event Ms. Heard and/or her counsel encounter any issues;
- 13) Providing the specific information and directions for how and where to enter and exit the building through a private entrance each day, including parking arrangements, and any contact person and their information for a smooth entrance and exit to provide protection from members of the public; and it is further

**ORDERED** that in the event Mr. Depp and his counsel do not comply with all the terms of this Order, the deposition will take place by Zoom, and Mr. Depp's counsel will arrange for the Zoom link and send to Ms. Heard's counsel. This provision also specifically applies to the confirmation provisions set forth in ¶¶ 10-12 above, and if there are any violations at any time during the deposition. In the event of non-compliance with any of the provisions above, Ms. Heard's counsel will inform Mr. Depp's counsel of any such violation, if the violation occurs while present at the building, they will exit (or not enter) the building, and make arrangements to convene separately for the duration of the deposition by Zoom, with Mr. Depp's counsel arranging for and communicating the link to Ms. Heard's counsel; it is further

**ORDERED** that all parties and counsel shall be mindful of the serious nature of the pandemic and the risks to each person and their families from contact with anyone who has any variant of

COVID, and shall take all actions consistent with respecting and protecting each other from risk of potential exposure.

**SO ORDERED.**

January \_\_\_\_, 2022

\_\_\_\_\_  
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.*

**WE ASK FOR THIS:**

---

Elaine Charlson Bredehoft (VSB No. 23766)  
Adam S. Nadelhaft (VSB No. 91717)  
Clarissa K. Pintado (VSB No. 86882)  
David E. Murphy (VSB No. 90938)  
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J. Benjamin Rottenborn (VSB No. 84796)  
Joshua R. Treece (VSB No. 79149)  
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*Counsel to Defendant/Counterclaim Plaintiff, Amber Laura Heard*

SEEN AND \_\_\_\_\_:

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



# Attachment 4

## **Mask and Social Distancing Policy**

**The Court has found it necessary and appropriate to adopt a mask and social distancing policy for all individuals entering our Courthouses and Court facilities.**

As established by General Order 2021-11, and as modified by General Order 2021-15, **ALL individuals, regardless of vaccination status**, that appear in person in the Courthouses/facilities in this District, to include employees, litigants, attorneys, jurors, stakeholders from other agencies, contractors, vendors, and members of the public, **are required to:**

(1) **Wear an N95 or KN95 mask** that covers their nose and mouth continuously in all indoor public areas of our Courthouses/facilities unless it is medically unsafe for them to do so **and** they obtain permission from the Chief Judge or Senior Active Judge. Individuals without access to an N95 or KN95 mask will be provided a KN95 mask at the building entrance. Inside of each courtroom, the presiding judge may permit temporary removal of masks for the purposes of facilitating a hearing or otherwise promoting the functioning and effective operation of the Court, with efforts made to ensure that individuals permitted to remove their mask generally stay **at least six feet apart** from other individuals. *Minors unable to fit into an adult-sized Court-provided KN95 mask are encouraged to bring their own properly fitting KN95 or similar mask. However, minors without access to a properly fitting KN95 or similar mask will be allowed to enter our Courthouses/facilities wearing a surgical mask, or a multi-layer cloth mask, or preferably, a surgical mask covered by a cloth mask.*

(2) **Maintain six feet of distance** from all individuals from outside their household whenever possible.

(3) **Stay home if you are sick.**

Any visitor seeking entry to our Courthouses/facilities that does not comply with these requirements may be denied entry by security staff and will be asked to contact the office/chambers to be visited and determine whether alternate arrangements can be made to accomplish the business needs of the visitor without entry to the Courthouse.

# Attachment 5

VIRGINIA:

IN THE CIRCUIT COURT OF FAIRFAX COUNTY

JOHN C. DEPP, II,

Plaintiff and Counterclaim Defendant,

v.

AMBER LAURA HEARD,

Defendant and Counterclaim Plaintiff.

Civil Action No.: CL-2019-0002911

CONSENT ORDER

Defendant and Counterclaim Plaintiff Amber Laura Heard (“Ms. Heard”) and Plaintiff and Counterclaim Defendant John C. Depp, II (“Ms. Depp”), by counsel, ~~having engaged in communications respecting appropriate safety precautions and protocols for Ms. Heard’s deposition commensurate with the precautions and protocols exercised for Mr. Depp’s deposition, communicating such protocols and precautions to Ms. Heard and her counsel, and providing for a default of a Zoom deposition in the event any of the conditions set forth in this Order are not fully complied with,~~ agree to the following as evidenced by their signatures below, and it is hereby:

**ORDERED** that Ms. Heard shall appear in person for three consecutive days of deposition at [REDACTED]

[REDACTED]

Ms. Heard shall be deposed for no less than seven hours of testimony each day, excluding breaks, except as otherwise agreed among counsel. The deposition shall commence on January 12, 2022 or such other date as may be mutually agreeable among counsel but must be concluded by March 4, 2022.

Mr. Depp and Ms. Heard agree to the following safety protocol during the deposition of

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Ms. Heard:

~~it shall be the responsibility of both Mr. Depp's and Ms. Heard's counsel to ensure the following safety precautions and protocols are completed and met for the duration of Ms. Heard's deposition:~~

- 1) Mr. Depp's counsel conducting the deposition will be fully vaccinated against COVID-19 and have received a booster shot. Mr. Depp's counsel shall make reasonable good faith efforts to ensure that the court reporter and videographer are similarly fully vaccinated;
- 2) Mr. Depp's counsel agrees to contact the local police department to notify them of the date and location of the deposition;
- 3) Mr. Depp's counsel agrees to contact building management to request appropriate cleaning the of office each day;
- 4) Mr. Depp's counsel agrees to order lunch each day for Ms. Heard and her counsel and will provide a separate room for breaks and lunch for Ms. Heard and her counsel;
- 5) Mr. Depp's counsel agrees to arrange for and pay for plexiglass dividers for each person in the room, including the videographer, the court reporter, Ms. Heard, and the parties' respective counsel;
- 6) Ms. Heard shall not wear a mask while being deposed;

~~4) The persons physically present at the deposition, including Ms. Heard, counsel/support staff on behalf of Ms. Heard and Mr. Depp, the court reporter, and videographer shall attest to being fully vaccinated and having received a booster shot (collectively, the "Authorized Individuals"). Anyone not attesting to being fully~~

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~~vaccinated and having received the booster shot may not be present in the conference room where the deposition is being held at any time, and may not come within 20 feet of Ms. Heard and her counsel/support staff; and~~

2)7) ~~All Authorized Individuals~~ individuals physically present in the deposition room or in any of the areas where Ms. Heard and her counsel/support staff may be located, such as reception areas, restrooms, separate conference room ("Contact Areas"), shall wear ~~N95 or KN95~~ surgical or filtered masks the entire time they are in the Contact Areas where ~~Authorized Individuals~~ individuals are present, and may only briefly remove their masks for purposes of drinking a beverage while others are present; and it is further

**ORDERED** that it shall be the responsibility of Mr. Depp and Mr. Depp's counsel to ensure the following safety precautions and protocols are completed in advance of and maintained for the duration of Ms. Heard's deposition:

- 3)8) ~~Securing a room and table for the deposition sufficient to ensure six feet of separation between Ms. Heard and her counsel/support staff and any of Mr. Depp's counsel/support staff, the court reporter, and the videographer at all times;~~
- 4)9) ~~Notifying the local police department of the deposition, including location, date and time and the potential for members of the public (including press and fans of either Mr. Depp or Ms. Heard) to appear, and the history of death threats to Ms. Heard during the UK trial,~~ so appropriate arrangements can be made for either side to contact the police department in the event of encountering any situation warranting police involvement and to remove any non-authorized members of the public from

interfering with or disrupting the parties orderly access to and from the building and while in the building and handling any potential threats;

~~5) Making arrangements with management of the building where the deposition is taking place to deep clean and sanitize all Contact Areas the night before the deposition, and each night for the duration of the deposition;~~

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~~6) Making arrangements with management of the building where the deposition is taking place to clean and sanitize each restroom used by any Authorized Individual after each use of the restroom by such persons for the duration of the deposition;~~

~~7) Making arrangements with management of the building where the deposition is taking place for sufficient security procedures to ensure no individual will have access to the floor on which the deposition or access into the Contact Areas except for the Authorized Individuals and the employees/other individuals associated with the law firm where the deposition is taking place;~~

~~8)10) Making arrangements with management of the building where the deposition is taking place for Ms. Heard and her counsel to enter and exit through a private garage and entrance/exit each day of the deposition, and ensuring no members of the public are in those areas;~~

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~~9) Making necessary arrangements for a separate room for breaks/lunch and for delivery of lunch for Ms. Heard and her counsel each day, to further ensure no unnecessary or further risks from contact with others to Ms. Heard and her counsel/support staff for the duration of the deposition;~~

~~10) Making necessary arrangements with the court reporter/videographer service to provide plexiglass dividers for each Authorized Individual in the deposition room; and~~

~~11) Making necessary arrangements with the court reporter service to ensure that the court reporter and any videographer provided for this deposition are fully vaccinated, have received a booster shot, and agree to wear N95 or KN95 masks for the entire time they are in the deposition room, and may only briefly remove their masks for purposes of drinking a beverage while others are present; and it is further~~

**ORDERED** that Mr. Depp's counsel shall provide to Ms. Heard's counsel, no later than 3:30 p.m. Eastern Time on Friday, January 7, 2022, the following:

~~10) Confirming Mr. Depp's counsel have taken the steps set forth in ~~¶¶ 3-11~~ above and will follow through with and adhere to them; and~~

~~11) Providing the contact name and telephone number for the Officer from the local police department to be called in the event Ms. Heard and/or her counsel encounter any issues;~~

~~12) Providing the specific information and directions for how and where to enter and exit the building through a private entrance each day, including parking, and any contact person and their information for a smooth entrance and exit; and it is further~~

**ORDERED** that in the event Mr. Depp and his counsel do not comply with all the terms of this Order, or the Court Reporter or Videographer do not comply with the requirements included in this Order, the deposition will take place by Zoom, and Mr. Depp's counsel will arrange for the Zoom link and send to Ms. Heard's counsel. This provision applies to the confirmation provisions set forth in ~~¶¶ 10-12~~ above, and also if there are any violations at any time during the



~~deposition. Under those circumstances, Ms. Heard's counsel will inform Mr. Depp's counsel of any such violation, they will exit the building, and make arrangements to convene separately for the duration of the deposition by Zoom, with Mr. Depp's counsel arranging for and communicating the link to Ms. Heard's counsel; it is further~~

~~**ORDERED** that all parties and counsel shall be mindful of the serious nature of the pandemic and the risks to each person and their families from contact with anyone who has any variant of COVID, and shall take all actions consistent with respecting and protecting each other from risk of potential exposure.~~

~~**SO ORDERED.**~~

January \_\_, 2022

\_\_\_\_\_  
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.*

**WE ASK FOR THIS:**

Elaine Charlson Bredehoft (VSB No. 23766)  
Adam S. Nadelhaft (VSB No. 91717)  
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J. Benjamin Rottenborn (VSB No. 84796)  
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*Counsel to Defendant/Counterclaim Plaintiff, Amber Laura Heard*

**SEEN AND CONSENTED TO:**

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

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# Attachment 10

**VIRGINIA:**

**IN THE CIRCUIT COURT OF FAIRFAX COUNTY**

JOHN C. DEPP, II,

Plaintiff and Counterclaim Defendant,

v.

AMBER LAURA HEARD,

Defendant and Counterclaim Plaintiff.

Civil Action No.: CL-2019-0002911

**PROTECTIVE ORDER RESPECTING DEPOSITION OF AMBER HEARD**

THIS MATTER CAME ON TO BE HEARD upon the emergency motion of Defendant and Counterclaim Plaintiff Amber Laura Heard (“Ms. Heard”) for a Protective Order to Protect All Individuals Attending the Deposition of Amber Heard, and it is hereby:

**ORDERED** that the deposition of Ms. Heard will take place by Zoom January 12-14, beginning at 9:30 a.m. Pacific Time each day. Mr. Depp’s counsel will arrange for the Zoom link and send to Ms. Heard’s counsel.

**SO ORDERED.**

January \_\_, 2022

\_\_\_\_\_  
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.*

**WE ASK FOR THIS:**

---

Elaine Charlson Bredehoft (VSB No. 23766)  
Adam S. Nadelhaft (VSB No. 91717)  
Clarissa K. Pintado (VSB No. 86882)  
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*Counsel to Defendant/Counterclaim Plaintiff, Amber Laura Heard*

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