

VIRGINIA:

IN THE CIRCUIT COURT OF FAIRFAX COUNTY

FILED
CIVIL PROCESSING

2022 MAR 29 10 1:40

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'S OBJECTIONS
TO PLAINTIFF AND COUNTERCLAIM DEFENDANT'S WITNESS LIST**

COMES NOW the Defendant and Counterclaim Plaintiff, Amber Laura Heard, by counsel, pursuant to the Scheduling Order issued in this case on April 22, 2021, and objects to the following witnesses identified by Plaintiff and Counterclaim Defendant:

KEY TO OBJECTIONS

WNI=Witness Not Identified or Not Timely Identified in discovery, although requested and Court Ordered; **CNP**= Witness Contact Information Not Produced, Not Timely Produced, or Inadequately Produced in Discovery, although requested and Court Ordered; **ID**=Improper Double Designation of Means of Calling Witness at Trial; **ODD**=Objections to Testimony Included in Deposition Designations; **MIL**=Currently the subject of Motions *in Limine*.


WITNESSES

| Witness | Objection(s) |
|--|--------------|
| John C. Depp, II, by in-person testimony | |
| Sean Bett, by in-person testimony | |
| Gina Deuters, by in-person testimony | CNP, MIL |
| Stephen Deuters, by in-person testimony | |
| Ben King, by in-person testimony | |
| Malcolm Connelly, by in-person testimony, but reserving the right to call by video link | ID, MIL |
| Travis McGivern, by video link | MIL, CNP |
| Starling Jenkins, by video link | |
| Dr. David Kipper, reserving the right to call by video link, otherwise by deposition testimony | ID, MIL |

| | |
|--|---------------|
| Isaac Baruch , reserving the right to call by video link, otherwise by deposition testimony | ID, MIL |
| Kevin Murphy , by video link | CNP, MIL |
| Christian Carino , reserving the right to call by video link, otherwise by deposition testimony | ID, MIL |
| Christi Dembrowski , by in-person testimony | |
| Tara Roberts , by video link | |
| Edward L. White , by in-person testimony | MIL |
| Sam Sarkar , reserving the right to call in person, otherwise by video link | ID, MIL |
| Paul Bettany , by video link | |
| Keenan Wyatt , by video link | CNP, MIL |
| Jack Whigham , reserving the right to call by video link, otherwise by deposition testimony | ID, MIL |
| Leonard Damian , by video link | WNI, CNP, MIL |
| Robin Baum , by video link | |
| Andy Milner , by video link | WNI, CNP, MIL |
| Samantha McMillen , by video link | CNP, MIL |
| Adam Waldman , reserving the right to call live or by video link, otherwise by deposition testimony | ID, MIL |
| Trinity Esparza , by video link | |
| Kate James , reserving the right to call by video link, otherwise by deposition testimony | ID, MIL |
| Debbie Rassel , by video link | |
| Shannon J. Curry, PsyD , by in-person testimony | MIL |
| Richard S. Gilbert, M.D. , by in-person testimony | |
| Richard Marks , by in-person testimony | |
| Michael Spindler, CPA, CFE, CFF, ABV, CAMS , by in-person testimony | |
| Doug Bania , by in-person testimony | |
| Bryan Neumeister , by in-person testimony | MIL |
| Kimberly Ann Collins, MD , by in-person testimony | |
| Dr. Richard Shaw , by in-person testimony | MIL |
| Rachael Frost , by in-person testimony | |

March 29, 2022

Respectfully submitted,



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*Counsel to Defendant and Counterclaim
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CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing was served this 29th day of March, 2022, by email, by agreement of the parties, addressed as follows:

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