

CL-2019-2911

This SUBPOENA/SUBPOENA DUCES TECUM TO PERSON UNDER FOREIGN SUBPOENA is being served by a private process server who must provide proof of service in accordance with Va. Code § 8.01-325.

TO the person authorized to serve this process: Upon execution, the return of this process shall be made to the Clerk of Court.

NAME: Tyler Hadden c/o Southwest Community Police Station	
ADDRESS: 1546 Martin Luther King Blvd. Los Angeles, California 90062	
<input type="checkbox"/> PERSONAL SERVICE	Tel. No.
Being unable to make personal service, a copy was delivered in the following manner:	
<input type="checkbox"/> Delivered to family member (not temporary sojourner or guest) age 16 or older at usual place of abode of party named above after giving information of its purport. List name, age of recipient, and relation of recipient to party named above:	
<input type="checkbox"/> Posted on front door or such other door as appears to be the main entrance of usual place of abode, address listed above. (Other authorized recipient not found.)	
<input type="checkbox"/> not found, Sheriff
DATE by, Deputy Sheriff

JOHN T. FREY, CLERK
FAIRFAX COUNTY CIRCUIT COURT
4110 CHAIN BRIDGE ROAD
FAIRFAX, VIRGINIA 22030

**SUBPOENA/SUBPOENA DUCES TECUM
TO PERSON UNDER FOREIGN SUBPOENA**

File No. CL2019-0002911

Commonwealth of Virginia VA CODE §§ 8.01-412.8—8.01-412.15; Rule 4:9

Fairfax County

Circuit Court

4110 Chain Bridge Road, Fairfax, Virginia 22030

ADDRESS OF COURT

John C. Depp, II

v./In re: Amber Laura Heard

TO THE PERSON AUTHORIZED BY LAW TO SERVE THIS PROCESS:

You are commanded to summon

Tyler Hadden

NAME

c/o Southwest Community Police Station, 1546 Martin Luther King Blvd

STREET ADDRESS

Los Angeles

California

CITY

STATE

FILED
CIVIL INTAKE
2019 DEC 23 PM 2:32
JOHN T. FREY
CLERK, CIRCUIT COURT
FAIRFAX, VA
90067
ZIP

TO THE PERSON SUMMONED: You are commanded to

attend and give testimony at a deposition

produce the books, documents, records, electronically stored information, and tangible things designated and described below

1900 Avenue of the Stars, Ste. 400
at Los Angeles, CA 90067

LOCATION

February 13, 2020 at 10:00 a.m.

DATE AND TIME

and to permit inspection and copying by the requesting party or someone acting in his or her behalf of the designated items in your possession, custody or control

permit inspection of the premises

at the following location

LOCATION

on _____
DATE AND TIME

This subpoena is issued upon the request of the party named below

Amber Laura Heard

NAME OF REQUESTING PARTY

c/o Ben Rottenborn, Esq., Woods Rogers, PLC, 10 S. Jefferson Street, Ste. 1400

STREET ADDRESS

Roanoke

Virginia

24011

(540) 983-7540

CITY

STATE

ZIP

TELEPHONE NUMBER

CL-2019-2911

The requesting party has submitted to this Clerk's Office the foreign subpoena, copy attached, the terms of which are incorporated herein, and the written statement required by Virginia Code § 8.01-412.10.

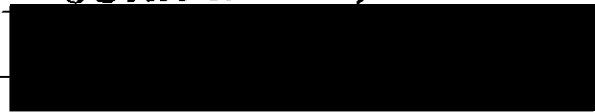
The names, addresses and telephone numbers of all counsel of record in the proceeding to which the subpoena relates and of parties not represented by counsel are provided below on attached list.

December 30th, 2019

DATE ISSUED

JOHN T. FREY, CLERK

by



J. Benjamin Rottenborn

84796

Virginia

NAME OF ATTORNEY FOR REQUESTING PARTY

BAR NUMBER

LICENSING STATE

Woods Rogers PLC, 10 S. Jefferson St.

(540) 983-7540

TELEPHONE NUMBER OF ATTORNEY

OFFICE ADDRESS

Suite 1400, Roanoke, Virginia 24011

(540) 983-7711

FACSIMILE NUMBER OF ATTORNEY

OFFICE ADDRESS

NAME

BAR NUMBER

LICENSING STATE

STREET ADDRESS

TELEPHONE NUMBER

STREET ADDRESS

FACSIMILE NUMBER

NAME

BAR NUMBER

LICENSING STATE

STREET ADDRESS

TELEPHONE NUMBER

STREET ADDRESS

FACSIMILE NUMBER

NAME

BAR NUMBER

LICENSING STATE

STREET ADDRESS

TELEPHONE NUMBER

STREET ADDRESS

FACSIMILE NUMBER

RETURN OF SERVICE (see page three of this form)

All Counsel of Record

Benjamin G. Chew, Esq. (VSB 29113)
Elliot J. Weingarten
Andrew C. Crawford (VSB No. 89093)
BROWN RUDNICK LLP
601 Thirteenth Street, NW
Washington, DC 20005
(202) 536-1700
(202) 536-1701 — FAX
bc Chew@brownrudnick.com

Counsel for John C. Depp, II

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

Counsel for John C. Depp, II

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

Counsel for John C. Depp, II

Robert Gilmore, Esq.
Kevin L. Attridge, Esq.
STEIN MITCHELL BEATO & MISSNER LLP
901 Fifteenth Street, NW, Suite 700
Washington, DC 20005
Tel. (202) 601-1602, or 1589
Fax (202) 296-8312
rgilmore@steinmitchell.com

Counsel for John C. Depp, II

Joshua R. Treece, Esq.
J. Benjamin Rottenborn, Esq.
WOODS ROGERS PLC
10 S. Jefferson Street, Suite 1400
Roanoke, VA 24011
T: 540.983.7730
F: 540.322.3885
jtreece@woodsrogers.com
brottenborn@woodsrogers.com

Counsel for Amber Laura Heard

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
703.460.9343 (Direct)
703.273.8898 (Office)
703.273.8897 (Fax)
tmcevoy@cameronmcevoy.com
sroche@cameronmcevoy.com

Counsel for Amber Laura Heard

Davida Brook, Esq. (SBN 275370)
SUSMAN GODFREY L.L.P.
1900 Avenue of the Stars, Suite 1400
Los Angeles, CA 90067
Tel. (310) 789-3105
dbrook@susmangodfrey.com

Counsel for Amber Laura Heard

Roberta A. Kaplan, Esq.
John C. Quinn, Esq.
Julie E. Fink, Esq.
KAPLAN HECKER & FINK LLP
350 Fifth Avenue, Suite 7110 New
York, New York 10118 T:
212.763.0883
rkaplan@kaplanhecker.com
jfink@kaplanhecker.com
jquinn@kaplanhecker.com

Counsel for Amber Laura Heard

ATTORNEY OR PARTY WITHOUT ATTORNEY (Name, State Bar number, and address): Davida Brook (SBN 275370) Susman Godfrey L.L.P. 1900 Avenue of the Stars, Suite 1400, Los Angeles, CA 90067 TELEPHONE NO.: 310-789-3100 FAX NO. (Optional): E-MAIL ADDRESS (Optional): dbrook@susmanandfrey.com ATTORNEY FOR (Name): Defendant Amber Laura Heard	FOR COURT USE ONLY
Court for county in which discovery is to be conducted: SUPERIOR COURT OF CALIFORNIA, COUNTY OF Los Angeles STREET ADDRESS: 111 N. Hill Street MAILING ADDRESS: 111 N. Hill Street CITY AND ZIP CODE: Los Angeles, CA 90012 BRANCH NAME: Central District	
Court in which action is pending: Name of Court: In the Circuit Court of Fairfax, Virginia STREET ADDRESS: 4110 Chain Bridge Road MAILING ADDRESS: CITY, STATE, AND ZIP CODE: Fairfax, VA 22030-4009 COUNTRY: United States	
PLAINTIFF/PETITIONER: JOHN C. DEPP, II DEFENDANT/RESPONDENT: AMBER LAURA HEARD	CALIFORNIA CASE NUMBER (if any assigned by court):
DEPOSITION SUBPOENA FOR PERSONAL APPEARANCE IN ACTION PENDING OUTSIDE CALIFORNIA	CASE NUMBER (of action pending outside California): CL-2019-0002911

THE PEOPLE OF THE STATE OF CALIFORNIA, TO (name, address, and telephone number of deponent, if known):

Tyler Hadden, Southwest Community Police Station, 1546 Martin Luther King Blvd, LA, CA 90062

1. YOU ARE ORDERED TO APPEAR IN PERSON TO TESTIFY AS A WITNESS in the action specified above at the following date, time, and place:

Date: February 13, 2020	Time: 10:00 AM	Address: 1900 Avenue of the Stars, Ste 1400, LA, CA 90067
-----------------------------------	--------------------------	---

- a. As a deponent who is not a natural person, you are ordered to designate one or more persons to testify on your behalf as to the matters described in item 2. (Code Civ. Proc., § 2025.230.)
 - b. This deposition will be recorded stenographically through the instant visual display of testimony and by audiotape videotape.
2. If the witness is a representative of a business or other entity, the matters upon which the witness is to be examined are as follows:

Continued on Attachment 2 (use form MC-025).

3. Attorneys of record in this action or parties without attorneys are (name, address, telephone number, and name of party represented):

See Attachment 3

Continued on Attachment 3 (use form MC-025).

SHORT TITLE: Depp v. Heard	CASE NUMBER: CL-2019-0002911
-------------------------------	---------------------------------

ATTACHMENT (Number): 3*(This Attachment may be used with any Judicial Council form.)*

Benjamin G. Chew, Esq. (VSB 29113)
 Elliot J. Weingarten
 Andrew C. Crawford (VSB No. 89093)
 BROWN RUDNICK LLP
 601 Thirteenth Street, NW
 Washington, DC 20005
 (202) 536-1700
 (202) 536-1701 – FAX
 bchew@brownrudnick.com

Counsel for John C. Depp, II

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

Counsel for John C. Depp, II

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

Counsel for John C. Depp, II

Robert Gilmore, Esq.
 Kevin L. Attridge, Esq.
 STEIN MITCHELL BEATO & MISSNER LLP
 901 Fifteenth Street, NW, Suite 700
 Washington, DC 20005
 Tel. (202) 601-1602, or 1589
 Fax (202) 296-8312
 rgilmore@steinmitchell.com

Counsel for John C. Depp, II

(If the item that this Attachment concerns is made under penalty of perjury, all statements in this Attachment are made under penalty of perjury.)

Page 1 of 2*(Add pages as required)*

SHORT TITLE: Depp v. Heard	CASE NUMBER: CL-2019-0002911
-------------------------------	---------------------------------

ATTACHMENT (Number): 3 Cont.*(This Attachment may be used with any Judicial Council form.)*

Joshua R. Treece, Esq.
 J. Benjamin Rottenborn, Esq.
 WOODS ROGERS PLC
 10 S. Jefferson Street, Suite 1400
 Roanoke, VA 24011
 T: 540.983.7730
 F: 540.322.3885
 jtreece@woodsrogers.com
 brottenborn@woodsrogers.com

Counsel for Amber Laura Heard

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
 703.460.9343 (Direct)
 703.273.8898 (Office)
 703.273.8897 (Fax)
 tmcevoy@cameronmcevoy.com
 sroche@cameronmcevoy.com

Counsel for Amber Laura Heard

Davida Brook, Esq. (SBN 275370)
 SUSMAN GODFREY L.L.P.
 1900 Avenue of the Stars, Suite 1400
 Los Angeles, CA 90067
 Tel. (310) 789-3105
 dbrook@susmangodfrey.com

Counsel for Amber Laura Heard

Roberta A. Kaplan, Esq.
 John C. Quinn, Esq.
 Julie E. Fink, Esq.
 KAPLAN HECKER & FINK LLP
 350 Fifth Avenue, Suite 7110
 New York, New York 10118
 T: 212.763.0883
 rkaplan@kaplanhecker.com
 jfink@kaplanhecker.com

Counsel for Amber Laura Heard

(If the item that this Attachment concerns is made under penalty of perjury, all statements in this Attachment are made under penalty of perjury.)

Page 2 of 2*(Add pages as required)*

SHORT TITLE: Depp v. Heard	CASE NUMBER: CL-2019-0002911
-------------------------------	---------------------------------

ATTACHMENT (Number): 4

(This Attachment may be used with any Judicial Council form.)

See Attached.

(If the item that this Attachment concerns is made under penalty of perjury, all statements in this Attachment are made under penalty of perjury.)

Page 1 of

(Add pages as required)

VIRGINIA :

IN THE CIRCUIT COURT OF FAIRFAX COUNTY

JOHN C. DEPP, II

Plaintiff,

v.

AMBER LAURA HEARD

Defendant.

Civil Action No.: CL-2019-0002911

CERTIFICATE OF COUNSEL

This is to certify that I caused a true and accurate copy of the enclosed Deposition Subpoena for Personal Appearance in Action Pending Outside California and Virginia Subpoena To Person Under Foreign Subpoena to be sent via email, per the parties' agreement regarding service by electronic mail, on the 20th day of December, 2019, to counsel of record.

 VSB 89602
J. Benjamin Rottenborn

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

Attorneys for Defendant Amber Laura Heard

I certify that on this 20th day of December 2019, a copy of the foregoing shall be served by first class mail, postage prepaid, and by email, upon:

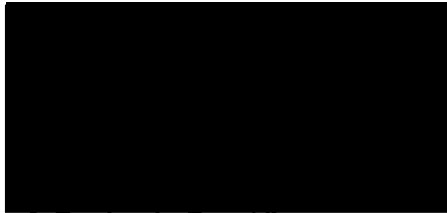
Benjamin G. Chew, Esq.
Elliot J. Weingarten, Esq.
Andrew C. Crawford, Esq.
BROWN RUDNICK LLP
601 Thirteenth Street, N.W.
Washington, D.C. 20005
Telephone: (202) 536-1700
Facsimile: (202) 536-1701
bchew@brownrudnick.com
eweingarten@brownrudnick.com
acrawford@brownrudnick.com

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

Adam R. Waldman, Esq.
THE ENDEAVOR LAW FIRM, P.C.
1775 Pennsylvania Avenue, N.W., Suite 350
Washington, DC 20006
awaldman@theendeavorgroup.com

Robert Gilmore, Esq.
Kevin Attridge, Esq.
STEIN MITCHELL BEATO & MISSNER LLP
901 Fifteenth Street, N.W.
Suite 700
Washington, D.C. 20005
Telephone: (202) 601-1589
Facsimile: (202) 296-8312
rgilmore@steinmitchell.com
kattridge@steinmitchell.com

Counsel for Plaintiff John C. Depp, II



VSB 89602
w/permission

J. Benjamin Rottenborn
Joshua Treece
WOODS ROGERS PLC
10 S. Jefferson Street
Suite 1400
Roanoke, VA 24011
Telephone: (540) 983-7540
Facsimile: (540) 983-7711
brottenborn@woodsrogers.com
jtreece@woodsrogers.com

BEN ROTTENBORN
(540) 983-7540
brottenborn@woodsrogers.com

December 20, 2019

VIA OVERNIGHT UPS DELIVERY

John T. Frey, Clerk
Fairfax County Circuit Court
4110 Chain Bridge Road
Fairfax, Virginia 22030

FILED
CIVIL INTAKE
2019 DEC 23 PM 2:27
JOHN T. FREY
CLERK, CIRCUIT COURT
FAIRFAX, VA

Re: John C. Depp, II v. Amber Laura Heard;
Fairfax County Circuit Court Case No. CL2019-0002911
Subpoena: Melissa Saenz

Dear Mr. Frey,

In the above-referenced matter, enclosed for filing please find two copies of Defendant's Certificate of Counsel and corresponding subpoenas issued pursuant to Virginia Code Section 8.01-412.10 and California Civil Procedure Code Section 2029.100 (collectively, "Acts"). The enclosed Deposition Subpoena for Personal Appearance in Action Pending Outside California and Virginia Subpoena To Person Under Foreign Subpoena have been issued in accordance with both Acts and the reciprocal privileges included therein.

The enclosed documents will be served by private process server and affidavits of service will be filed as necessary. Please file these documents with the Court's papers in this case and return a file-stamped copy of the same in the enclosed, self-addressed envelope.

Thank you for your assistance and please do not hesitate to call with any questions or concerns.

Very truly yours,

WOODS ROGERS PLC

 *Ben Rottenborn*
89602

Ben Rottenborn

JBR:jt
Enclosures